


MEMORANDUM

DATE	June 29, 2018
TO	EPPP2 Task Force
FROM	 Lavinia Snyder Examination Coordinator
SUBJECT	Agenda Item #5: Review and Discussion of ASPPB's Response to the EPPP2 Task Force Letter Regarding Questions and Concerns Raised at the April 5, 2018, Task Force Meeting

Background:

The Board's first Examination for Professional Practice in Psychology Part 2 (EPPP2) Task Force meeting was held on April 5, 2018. The meeting was conducted by Dr. Sheryl Casuga (Chair) and Mr. Seyron Foo (Board member) to discuss issues related to the potential implementation of the EPPP2 and to assist the Board in promulgating regulations. At the meeting, the following issues were discussed:

- a) Is Implementation of a New National Licensing Examination in the Best Interests of California Consumers of Psychological Services and Prospective Licensees?
- b) Should the Board Allow ASPPB to Determine Eligibility for Taking the National Examination for California Applicants? Should There Be Different Eligibility Criteria?
- c) How Would California Licensing Requirements Be Impacted if ASPPB Allows Candidates to Directly Register for and Take the EPPP (Part 1) Prior to Graduation and Completion of 1,500 Hours of SPE?

After a lengthy discussion on these issues, Task Force members decided to send a letter to the Association for State and Provincial Psychology Boards (ASPPB) Board of Directors to address their questions and concerns. A copy of the letter is attached (Attachment A). ASPPB's response to the letter is also attached (Attachment B).

Action Requested:

Discuss ASPPB's response to the Task Force's questions. This item is for informational purposes only, no further action is required.

Attachment A: EPPP2 Task Force Letter to ASPPB Board of Directors

Attachment B: ASPPB's EPPP2 Task Force Response

Attachment A
EPPP2 Task Force Letter to ASPPB Board of Directors

April 9, 2018

Association of State and Provincial Psychology Boards (ASPPB)
Board of Directors
P.O. Box 849
Tyrone, GA 30290

Dear Board Members:

The California Board of Psychology established the Examination for Professional Practice in Psychology Part 2 (EPPP2) Task Force (Task Force) at its February 2018 Board meeting to discuss issues and concerns surrounding the implementation of the EPPP2 and to provide feedback and recommendations to the full Board. The Task Force met on April 5, 2018. At this meeting, Matt Turner, PhD, ASPPB's Director of Examination Services, and Emil Roldolfa, PhD, Chair of ASPPB's EPPP2 Implementation Task Force, made a presentation on the EPPP2 and answered questions posed by the Task Force members.

After the meeting, a list of questions/concerns were developed, and the Task Force is respectfully requesting that the ASPPB Board of Directors address the following issues at its next Board of Directors' meeting:

- What were the factors that led to the decision to create two separate examinations instead of one combined examination that assesses both knowledge and skills?

The concern was raised that having two examinations comes with additional cost to prospective licensees.

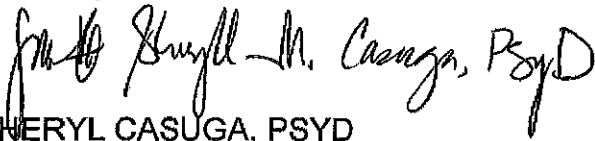
- Would ASPPB consider a mechanism to make the cost of the examination more affordable for low-income applicants or for those serving impoverished communities, underserved populations, or performing services in public agencies? For instance, would there be consideration to lower the cost of the EPPP Part 1 to off-set the cost of the whole examination?
- Would ASPPB reconsider its requirement of American Psychological Association (APA) or Canadian Psychological Association (CPA) accreditation for eligibility to take the EPPP Part 1 for pre-degree graduate students?

The concern was raised that having APA/CPA accreditation as a requirement impedes upon the regulatory function of state boards, given that many states including California do not require APA accreditation. Additionally, some doctoral programs without APA/CPA accreditation, but with regional accreditations, serve as accessible institutions from underrepresented communities, including communities of color, socioeconomically disadvantaged areas, and immigrant communities.

- Would ASPPB consider delaying the implementation of the EPPP2 to allow jurisdictions more time to develop processes, procedures, legislation and/or regulations for implementation?
- What was the formal process ASPPB used to solicit feedback from member boards and would the Task Force be able to review the feedback received?

The Task Force will be conducting another meeting on June 29, 2018 and would be grateful to receive feedback from the Board of Directors in advance for consideration by the Task Force.

Sincerely,

A handwritten signature in black ink that reads "Sheryl M. Casuga, PsyD". The signature is written in a cursive style with a large initial "S" and "C".

SHERYL CASUGA, PSYD
Chairperson, EPPP2 Task Force
California Board of Psychology

Attachment B
ASPPB's EPPP2 Task Force Response



ASPPB

Association of State and
Provincial Psychology Boards

Supporting member jurisdictions in fulfilling their responsibility of public protection.

Dear California EPPP Task Force,

Thank you for the opportunity to discuss the enhanced EPPP. We appreciate your engagement and feedback in this important endeavor. The ASPPB Board of Directors has asked us to respond to your letter. We understand you have questions regarding the development, rationale and implementation of the EPPP. We hope that this letter will be responsive to your concerns.

Specifically, you raised questions about 1) the rationale for two separate examinations; 2) the cost of the EPPP; 3) the early admission requirements; 4) the implementation date of the EPPP Part 2; and 5) the membership feedback regarding the development of the skills examination. Each issue will be addressed below.

What were the factors that led to the decision to create two separate examinations instead of one combined examination that assesses both knowledge and skills?

The concern is that having two examinations comes with additional costs to prospective licensees.

The EPPP continues to be one exam. The exam will be a more comprehensive assessment of competency that is delivered in two parts. The Job Task Analysis drove the decision to lengthen the exam instead of incorporating the knowledge and skills into a single sitting of the examination. The results of the job task analysis revealed that an enormous amount of material will need to be assessed to incorporate a comprehensive assessment of skills. After completion of the Job Task Analysis, the following Blueprint was indicated:

Scientific Orientation to Practice
Relational Competence
Assessment and Intervention
Ethical Practice
Collaboration
Consultation
Supervision
Professionalism

Within this blueprint, 71 skill statements were included. Conversely, 70 Knowledge statements were included in the EPPP part one. Collectively, this will require that 141 statements be thoroughly assessed in order to determine if a candidate meets a minimum, entry level of competence for the profession of psychology. A decision was made to include the addition of the skills assessment as a second part of the examination for several reasons. First, the EPPP as it is constructed now is a 175-item multiple choice examination. It would not be possible to adequately assess the additional skills statements within a reasonable amount of time. The length of the current EPPP is 4 hours and 15 minutes. Increasing this to a single session would lead to a very lengthy examination for the test takers. In addition, any test taker requiring an accommodated administration of extended time would have an extremely lengthy administration. This structure would be too taxing on candidates in general and specifically problematic for those with disabilities.

Second, by offering the exam in two parts, the knowledge portion of the examination could be moved earlier as an option for those that would prefer to take the exam prior to graduation from their academic program. This model is logical, in line with other professions that have competency assessment examinations and will allow candidates more flexibility in taking the exam.

President, Board of Directors – Sharon Lightfoot, PhD

Chief Executive Officer – Stephen T. DeMers, EdD

The proposed increase in examination fees is not related to whether or not the exam is administered in one or two sittings. The increase in fees is related to the significant startup and maintenance costs in the development of a new area of assessment. It is not possible to add this assessment without additional costs.

As ASPPB representatives mentioned in the meeting with the Task Force, the Early Admittance Option will have some benefits, including the following:

1. increasing the overall number of candidates that pass the knowledge portion of the examination on their first attempt as our current data indicates that candidates pass at higher rates when the exam is taken closer to completion of academic coursework. This would result in financial savings as fewer individuals would need to retake the exam.
2. decreasing dependence on and associated cost of third party test prep study programs because the knowledge portion of the examination will be taken closer to the foundational coursework and,
3. allowing exam costs to be incorporated into educational loans.

Would ASPPB consider a mechanism to make the cost of the examination more affordable to low income applicants or those serving impoverished communities, underserved populations, or performing service in public agencies? For instance, would there be consideration of a lower cost for the EPPP Part 1 to offset the cost of the whole examination.

ASPPB is considering options to decrease the hardship associated with increased fees to candidates. No decisions have been made at this time.

Would ASPPB reconsider its requirement of APA or CPA accreditation for eligibility to take the EPPP Part 1 for pre-degree graduate students?

The early entry option will be limited to students that are enrolled in APA or CPA accredited programs. This decision was based on the ASPPB Model Act which recommends that licensure applicants are trained in accredited training programs. In addition, this standard for an early entry option allowed for greatest acceptance by most jurisdictions.

For Jurisdictions that wish to allow an early admittance option for applicants from non-accredited training programs, ASPPB suggests that a rule change be made in those jurisdictions to allow those candidates to be able to take the Part 1 prior to degree. This will enable states and provinces to use criteria relevant in their particular jurisdiction. Jurisdictions would continue to register candidates as they do now but the timing would be prior to degree.

Would ASPPB consider delaying the implementation of the EPPP Part 2 to allow jurisdictions more time to implement processes, procedures, legislation, and or regulations for implementation?

The ASPPB Board of Directors continues to monitor the needs of member jurisdictions and the organization has been actively engaged in communication with jurisdictions about their concerns. In most jurisdictions, there does not appear to be a need to change regulations. At this time, the launch date is planned for January 2020. ASPPB encourages communication from jurisdictions that may be facing hurdles in implementation.

What was the formal process of soliciting feedback from member boards and would the task force be able to review the feedback.

Beginning in 2009 ASPPB has been in discussion with member jurisdictions about assessment of competencies through discussions at membership meetings, review of feedback at such meetings and various surveys of interest. As can be seen from the following data from ASPPB's most recent strategic plan, there was broad support from our member jurisdictions for developing an assessment of skills prior to becoming licensed.

70% of the respondents to the Strategic Plan rated that maintaining ASPPB's Examination Program and expanding it to measure skills was a top priority. This priority ranked as the second highest priority for ASPPB right behind pursuing more consistency in licensing standards to facilitate professional mobility. The skills exam was rated

second, but close to the knowledge exam in order of importance of priority for the next 3-5 years for the examination program.

The Board of Directors remains actively engaged in the process of member feedback and has recently sent out a letter alerting member jurisdictions that they will spend considerable time this summer reviewing all information received. The California EPPP Task Force's letter and any further communications will be included in the board's review.

Thank you for the opportunity to answer your questions. We hope our comments address your concerns. Please feel free to contact us if the Task Force has additional questions or comments.

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