

## MEMORANDUM

<b>DATE</b>	January 23, 2026
<b>TO</b>	Licensing Committee Members
<b>FROM</b>	Jonathan Burke Executive Officer
<b>SUBJECT</b>	<b>Agenda Item 6</b> EPPP Update

### Updates

The Board drafted a letter of concern on May 20, 2025, relating to the integrated EPPP (IEPPP) and sent it to the Association of State and Provincial Psychology Boards (ASPPB) on June 2, 2025 (see Attachment A).

ASPPB hosted the second virtual town hall meeting for the Education and Training Community on June 25, 2025. The Board attended this second virtual town hall.

ASPPB hosted a third virtual town hall meeting for students and license/certification candidates on September 18, 2025. The Board attended this virtual town hall. Additionally, the Board launched an outreach campaign to its licensees and interested parties. Through social media and distribution lists the Board was able to expand awareness and encourage participation in this virtual town hall.

Additionally, ASPPB conducted a Job Task Analysis of the Practice of Psychology (JTA) to be completed by licensed psychologists which closed on September 29, 2025. The JTA process happens once every seven (7) to 10 years and directly shapes the examination specifications and content used to evaluate the knowledge and skills required for licensure. The Board sent multiple emails and alerts on its social media platforms. ASPPB reported at their Annual Meeting that 25% of all responses were from California licensees.

At the November 2025 Board meeting Board members requested a draft implementation plan be developed by staff to better prepare for implementation and prepare for potential issues. In January 2026 the Executive Officer spoke with ASPPB's Executive Director Dr. Mariann Burnetti-Atwell. At this meeting Dr. Burnetti-Atwell shared:

- A Blueprint based on the JTA will be made public on February 1, 2026. The Blueprint will show what entry level practice areas and domains should be included in the exam. This information will be shared with the training and education community and applicants preparing for licensure.
- The projected cost of the examination should be shared in the first half of 2026.
- Item writing will be conducted in 2026.

- In the first quarter of 2027 beta testing of a sample exam will begin with a committee determining the passing score.
- The IEPPP should launch in the fourth quarter of 2027.

The Board's questions regarding the eligibility to sit for the examination (once coursework has been completed or after coursework and practice hours completed) are still being discussed by ASPPB.

There have been no further conversations with Texas regarding the development of their own examination. The creation of a second national examination will have ramifications for license portability and reciprocity. This will be addressed in the Board's final implementation plan.

Dr. Hao Song, PhD, ICE-CCP, Associate Executive Officer of Examination Services at ASPPB will be present at the February 2026 Board meeting and will give a presentation on IEPPP development and answer any questions the Board and public may have.

### **Timelines of Events in 2025**

Dr. Harb Sheets, Chairperson of the of the Licensure Committee, and Ms. Susan Hansen, Examinations Coordinator, attended a virtual town hall meeting organized by ASPPB on April 3, 2025. At that meeting, the Board heard that the proposed implementation date of the new integrated Examination for Professional Practice in Psychology (EPPP) will be in 2027. A survey will be sent out to member Boards later this year and we will be invited to comment on the proposals. The Board has expressed concerns regarding the likely increased cost of the examination to applicants and a desire by ASPPB to require the examination be taken as the final step of the application process. This would contradict the changes made to California law by AB 282 (Chapter 425, Statutes of 2023) which allows applicants to take the examination after they have completed their coursework. The Board supported this change as it will likely increase the passage rate of the EPPP.

Dr. Hao Song, PhD, ICE-CCP, Associate Executive Officer of Examination Services at ASPPB, attended the May 9, 2025 Board meeting to present on the timeline and development of the integrated EPPP. At the same meeting, the Board discussed the concerns regarding the integrated EPPP and implementation timeline and voted to send a letter to ASPPB to express these concerns as discussed.

### **Attachments:**

- A. Letter to ASPPB
- B. Draft Implementation Plan

### **Action Requested:**

This is an informational item.

## **History of Board Consideration of the EPPP2**

In 2017, the Board determined that there was a need for stakeholder input regarding possible implementation of the ASPPB Examination for Professional Practice in Psychology Part 2 (EPPP2). A Task Force with representatives from various stakeholders was created to provide input to the Board regarding consideration and possible implementation of the EPPP Part 2.

The Task Force's role was to consider the pros and cons of the proposed examination to the Board's prospective licensees and consumers, eligibility criteria, the application process, and the impact on the Board's process for licensure. The Task Force met on April 5th and June 29th, 2018 at the Department of Consumer Affairs' (DCA's) Headquarters in Sacramento. This Task Force was chaired by Board Member Dr. Sheryll Casuga.

The Examination for Professional Practice in Psychology, currently known as the EPPP Part 1 (Knowledge), is a computer-based examination developed and administered by ASPPB. This exam is one of two examinations required for licensure in California. The cost of the exam to the applicant is \$600.00.

EPPP Part 2 (Skills exam), per ASPPB, will provide an independent, standardized, reliable, and valid assessment of the skills necessary for independent practice and enhance consumer protection. The cost of this exam was initially set at \$600.00. ASPPB, at the time of the initial Task Force meeting, announced the plan to make this exam mandatory for all jurisdictions.

After several discussions, the Task Force did not believe the EPPP Part 2 was in the best interests of California consumers for the following reasons:

- Lack of a proven necessity for the examination;
- Concerns related to the exam's ability to assess skills resulting in negligible consumer protections;
- Costs and burden on prospective licensees, and especially on historically underrepresented and socioeconomically disadvantaged students;
- New barriers to licensure and potentially detrimental impact on access to psychological services to California consumers; and
- Clarification on whether the optional Enhanced EPPP is an indefinite alternative or ASPPB is simply postponing the deadline for mandatory adoption. If the implementation date is merely being delayed, the Board would appreciate clarification on the anticipated date for mandatory implementation.

The Task Force also had significant concerns with the loss of license portability with other States if ASPPB decided to mandate the EPPP Part 2. Due to this concern, the Task Force recommended (should part 2 become mandatory) that the Board continue participation in the EPPP and not create its own version of a national examination.

In August 2018, ASPPB retracted its decision and made the EPPP Part 2 an optional exam for all state boards and proposed incentives for early adopters. Although ASPPB's

announcement clarified that the EPPP Part 2 was now an optional component, it raised concerns regarding whether ASPPB would eventually make the examination mandatory.

These concerns were addressed in the letter dated December 2018 which stated as follows:

*"The Board of Psychology supports a competency-based examination but feels that certainty is required as to its mandatory implementation, and that a date certain for all member jurisdictions is necessary. Uncertainty as to implementation results in a current inability to move forward with the required statutory and regulatory changes.*

*ASPPB would aid its member jurisdictions if it were to identify all statutory and regulatory changes needed to implement the new examination (drafting and supporting statutory and regulatory changes through advocacy, etc.) over a set period of time calibrated to the expected implementation date and the time necessary to effect needed changes.*

*ASPPB should continue to evaluate the total cost of both examinations and establish a uniform lower total cost as to all jurisdictions, as of the mandatory effective date of the Enhanced EPPP.*

*In addition, the Board also requests that ASPPB make available to the Board and the Department of Consumer Affairs' Office of Professional Examination Services the following information as it becomes available:*

- *Data from Beta testing from participating jurisdictions to evaluate the validity of the Enhanced EPPP.*
- *Evidence of external validity that substantiates the need for the Enhanced EPPP. This information would help further clarify the need for and validity of the Enhanced EPPP and inform the Board's discussion regarding the prospect for adoption of the Enhanced EPPP."*

ASPPB's response was noted in a letter dated January 29, 2019. Summarily, ASPPB Board of Directors (BOD) had determined that the jurisdictional use of the Enhanced EPPP would not be mandated during the initial implementation process. The BOD, however, would revisit the implementation process of the examination and determine whether or not to continue delivering the EPPP 1 as a stand-alone option or only to deliver the Enhanced EPPP. They would take into consideration the time it takes for California to develop and implement regulation changes and factor that into their decision.

ASPPB also reduced the exam fee for the EPPP2 from \$600.00 to \$450.00 and to allow the Board access to beta testing information from participating jurisdictions to enable the DCA, Office for Professional Examination Services (OPES) to conduct an audit of the EPPP.

This audit was completed in April 2021. Summary of the audit is as follows:

"Overall, the SMEs concluded that the content of the EPPP Part 1 assesses general knowledge required for entry level psychologist practice in California, with the exception of California law and ethics. This general knowledge should continue to be tested on the California Psychology Law and Ethics Examination.

The SMEs were impressed by the EPPP Part 2, both by the concept of measuring skills and by the design of the scenario-based items. Additionally, the SMEs favored the EPPP Part 2 over the EPPP Part 1 as a single-examination option. However, the SMEs concluded that while the EPPP Part 2 assesses a deeper measure of skills than those measured by the EPPP Part 1, that alone may not support adoption of the EPPP Part 2. The SMEs further concluded that the skills measured by the EPPP Part 2 may be adequately assessed during supervised clinical experience, and that the EPPP Part 2 could possibly be an unnecessary barrier to licensure. OPES recommends that the Board continue to monitor the beta testing results of the EPPP Part 2 as part of their decision-making process for adopting the EPPP Part 2 as a requirement for licensure in California in the future."

This audit was presented at the EPPP AdHoc Committee meeting held on October 21, 2021. However further discussion could not be made until the ASPPB Board of Directors decided on their plan for the EPPP2.

In October 2022, the ASPPB Board of Directors announced the implementation of the Enhanced EPPP two-part exam to become effective January 1, 2026, to all member jurisdictions. ASPPB does not believe that the EPPP2 will create a barrier to practice and promises to smooth the road to licensure amidst a national mental health crisis. ASPPB's core value is to develop a fair, equitable and accessible exam and that the two-part exam ensures a thorough assessment of competence and promote consumer protection. They will be mindful of the cost and confirmed a 25% reduction in the EPPP2 fee with no current plans to increase the fee.

After the announcement, the Board received several letters of opposition and one in favor of implementing the EPPP2.

The EPPP Ad Hoc Committee met on April 28, 2023, to discuss the EPPP part 2 and make recommendations to the Board. Implementation of the EPPP part 2 meant that statutory and regulatory changes were necessary to continue to conduct business and license portability remains. If the Board decides not to implement the EPPP part 2, this will require the creation of California's own practice base exam which would add additional cost to the Board's examination development process, and it would also eliminate license portability for California licensees.

Committee Recommendations were as follows:

- 1) To adopt the two-part EPPP exam for licensure for the State of California effective January 1, 2026, to avoid any interruption of service.

- 2) To have staff conduct an analysis of developing a California practice exam to be reported at the Board's Q3 2024 meeting.
- 3) Direct the executive officer to continue to work with ASPPB and communicate any barriers to licensure concerns from the Board.

The Committee also reviewed the proposed statutory and regulatory language that would enable Board staff to implement the two-part EPPP exam.

In May 2023, the Board accepted the committee's recommendation and agreed to adopt the two-part EPPP exam on January 1, 2026.

In August 2024 the Board provided the process, workload, and cost to develop a California practice exam in lieu of adopting the EPPP 2.

The Texas Behavioral Health Executive Council expressed opposition to the mandated EPPP two-part exam and proposed amending the ASPPB's bylaws. As a response, ASPPB made announcement to the member jurisdictions that a vote would be taken at the annual meeting October 30-November 3, 2024, regarding ASPPB's bylaws amendments. (Attachment H)

In October 2024, the California Psychological Association (CPA) wrote a letter opposing the implementation of the EPPP two-part exam. CPA has requested that the Board do the following at its November 2024 meeting:

1. Reverse its adoption of the EPPP-2 starting January 1, 2026.
2. Cease development of laws and/or regulations relating to EPPP-2.

On October 22, 2024, ASPPB issued a letter to member jurisdictions that they are pausing the 1/1/2026 EPPP 2-part exam mandate. They will explore the feasibility of a single EPPP exam that test on both knowledge and skills.

Board staff have stopped drafting the regulatory package that was going to implement the EPPP2 examination by January 1, 2026. The same package was going to implement AB 282 and staff will present modified text for Board approval at the February 2025 meeting.

AB 282 allows applicants to take the EPPP or CPLEE, or both exams as soon as they have completed all academic coursework required for a qualifying doctoral degree.

The law also states, "If a national licensing examination entity approved by the board imposes additional eligibility requirements beyond the completion of academic coursework, the board shall implement a process to verify that an applicant has satisfied those additional eligibility requirements."

Additional reference can be found on the [Informational Page](#) for EPPP Part 2 on the Board's website.

May 20, 2025

Dr. Mariann Burnetti-Atwell, PsyD  
Chief Executive Officer  
Association of State and Provincial Psychology Boards (ASPPB)  
215 Market Road  
Tyrone, GA 30290

Dear Dr. Burnetti-Atwell,

The California Board of Psychology (Board) met on May 9, 2025, to discuss updates regarding the implementation of the integrated Examination for Professional Practice in Psychology (EPPP), the anticipated 2027 launch of the skills assessment component, and concerns about the increasing use of artificial intelligence (AI) in exam development and administration. Hao Song, PhD, ICE-CCP, ASPPB's Associate Executive Officer of Examination Services, provided a presentation on the integrated EPPP and answered questions posed by the Board members.

The Board acknowledges ASPPB's efforts to improve the licensing examination and ensure it reflects the evolving competencies required for safe and effective psychological practice. As one of the largest licensing jurisdictions in the United States, California will require sufficient time and jurisdiction-specific planning to align its regulatory frameworks and operational procedures with these significant changes. Additionally, the implementation of Assembly Bill (AB) 282 (Chapter 425, Statutes of 2023), which requires regulatory amendments already underway, will intersect with ASPPB's current proposed timeline to launch the integrated EPPP in Q4 of 2027. This further underscores the need for extended preparation time and close coordination.

To ensure a smooth and equitable transition, the Board respectfully raises the following considerations:

**1. Jurisdictional Coordination and Regulatory Impact**

The transition to an integrated EPPP with a skills component represents a fundamental change that will require comprehensive planning and revisions to the Board's regulations. California's multi-stakeholder rulemaking process necessitates thorough evaluation and coordination, making sufficient preparation time essential. A well-structured and phased implementation plan with a minimum of 36 months of lead time will be critical to ensuring regulatory alignment and system updates.

**2. Implementation Timeline and Resource Planning**

Given the complexity of adopting a dual-component EPPP, the Board urges ASPPB to provide jurisdictions with a detailed rollout timeline, training resources, and technical specifications as early as possible. Additionally, a more definitive and realistic implementation timeline is essential, as the current proposal to launch the integrated EPPP in Q4 of 2027 is not feasible. Providing sufficient lead time will allow the Board to initiate the necessary regulatory changes, fiscal planning, and

stakeholder education campaigns to ensure a seamless transition for applicants and licensees.

**3. Transparency in Content Validity and Test Design**

Content validity remains a concern in the skills assessment component of the EPPP. The Board seeks clarity on how ASPPB establishes content validity in the integrated EPPP and requests ongoing updates on its development. Additionally, a sample exam question on assessment presented at the ASPPB Townhall on April 3, 2025, lacked sufficient context for a clear response. The Board encourages ASPPB to take the necessary steps to improve the quality of newly developed questions for the skills assessment component to ensure clarity, relevance, and fairness for all candidates.

**4. Eligibility and Pass Rate Concerns**

Business Professions Code (BPC) 2914 allows candidates to take the EPPP after completing all academic coursework required for a qualifying doctoral degree, excluding internship, with the goal of improving pass rates. However, the eligibility requirements in terms of supervised professional experience for the integrated EPPP remain unclear, and restrictions on early testing could inadvertently counteract this legislative intent. The Board requests that ASPPB clarify both the specific eligibility criteria and the process for determining eligibility under the new exam structure to support fair access and alignment with California's licensure framework.

**5. Transition Period for the Integrated EPPP**

The current proposal lacks details regarding a transition period for existing EPPP candidates. The Board requests that ASPPB provide clear guidance on the duration and structure of this transition to ensure exam candidates and training programs have sufficient time to prepare.

**6. Artificial Intelligence (AI) Integration**

The growing use of AI in exam development, scoring, and quality control introduces both innovation and risks. The Board requests detailed information on how AI is being integrated into the EPPP, including safeguards to prevent algorithmic bias, preserve data integrity, and ensure psychometric fairness across diverse candidate populations.

**7. Accessibility and Accommodations**

If AI-enabled testing platforms are introduced, they must comply with the Americans with Disabilities Act (ADA) and related provisions. Accessibility should remain a core design feature, ensuring equitable support for candidates with disabilities rather than a secondary consideration.

**8. Cost Considerations and Transparency**

A potential exam fee increase was announced at the Townhall on April 3, 2025, by ASPPB, yet details remain unclear. Any increase in exam costs could create

financial barriers for candidates. The Board urges ASPPB to provide transparent cost projections and a clear justification for any fee adjustments to ensure affordability and equitable access for all candidates.

**9. Stakeholder Engagement and Communication**

The Board strongly encourages ASPPB to engage in ongoing dialogue with its member jurisdictions by providing timely updates, facilitating two-way communication, and sharing implementation plans well in advance of any formal rollout. Clear guidance and transparency will be critical for state boards to adjust statutes, regulations, and infrastructure accordingly.

The Board appreciates ASPPB's commitment to upholding examination standards that reflect modern psychological practice and safeguard public welfare. We are eager to collaborate closely with ASPPB and our peer jurisdictions to ensure that the transition to the integrated EPPP is equitable, transparent, and logically sound.

We thank you for your attention to these matters and remain available to participate in any implementation workgroups, jurisdictional briefings, or public comment opportunities that may support the success of this initiative.

If you have any questions or concerns, please feel free to contact the Board's Executive Officer, Jonathan Burke, at (916) 574-8072 or [jonathan.burke@dca.ca.gov](mailto:jonathan.burke@dca.ca.gov). Thank you.

Sincerely,



Lea Tate, PsyD  
President, Board of Psychology

cc: Shacunda Rodgers, Vice President  
Members of the Board

## Potential Changes Needed for California to Implement the Integrated EPPP

### 1. Regulatory Updates

- **Review eligibility requirements:** The Board would need to review its eligibility requirements to determine when candidates can take the integrated EPPP. ASPPB has indicated that the exam is intended to be taken after internship and before postdoctoral training at one of their Townhall meetings. If the Board chooses to align with this approach, regulatory changes will be required, and regulatory changes typically take two to three years to complete.
- **Transition period:** A transition plan may be needed for applicants who remain eligible for the current EPPP. The Board will need to determine both the grace period and the final cutoff date for accepting applications under the current exam structure. The timing may depend on how long ASPPB continues offering both exams to California candidates.
- **Regulatory package requirements:** The Board will need to update current regulations. It could be a Section 100 to clarify nonsubstantive changes or a full regulatory package. If the EPPP's name is changed to the integrated EPPP, then we would need to make Section 100 changes to reflect the new name. Depending on changes to the registration and eligibility for the integrated EPPP, we may need to update our regulations for initial applications.

### 2. ASPPB Contract

- **New contract:** Implementing the integrated EPPP will require a new contract with ASPPB. The Board's current contract expires on June 30, 2027, and future contract planning may need to remain flexible until ASPPB provides clearer implementation timelines. Changes to contract would need to be submitted to the Department prior to its expiration and its review process could take up to 60 days.

### 3. BreEZe System Updates

- **Online system changes:** The BreEZe system would require updates to incorporate the new exam and eligibility requirements. This may include modifying application questions, adjusting internal processing workflows, updating system configurations, and revising interfaces, depending on the final structure of the integrated EPPP.

#### **4. Review by the Office of Professional Examination Services (OPES)**

- **Pending evaluation:** OPES must review and evaluate components of the integrated EPPP to fulfill its statutory mandate for periodic examination evaluation. According to OPES, the Occupational Analysis (OA) of psychology practice in California is currently underway. Once the OA is completed, OPES will conduct the National Review during Fiscal Year 2026–2027, comparing the OA-derived description of California psychology practice with the content of the EPPP. This analysis will determine whether the EPPP adequately reflects California practice.

The National Review requires a separate contract between OPES and the Board. OPES anticipates completing the National Review by the end of Fiscal Year 2026-2027, assuming ASPPB provides the necessary information to OPES on schedule. If timelines are met, implementation of the integrated EPPP could begin in Fiscal Year 2027-2028.

#### **5. License Verification/File Transfers Applications**

- **Increase in Workload:** There is a likelihood that we may see an increase in License Verification or File Transfer Applications. In the event this addition exam causes a barrier to licensure, Psychological Associates may seek licensure in another state that may not have adopted the new examination requirements.

#### **6. Statutory Changes:**

- **Clean Up:** A review of statutes will be needed to see if any changes are needed, an example would be amendments to language surrounding exam eligibility.

#### **7. Outreach Activity:**

- The board will need to educate potential applicants of any changes to the licensure requirements. Various ways we provide outreach include advisories, listserv notices, newsletter articles, social media posts (Facebook, X, and LinkedIn), website updates, FAQ's, etc.