

MEMORANDUM

DATE	January 22, 2019
TO	Board of Psychology
FROM	 Antonette Sorrick Executive Officer
SUBJECT	Agenda Item 17: Consider Implementation of Enhanced EPPP, Including Latest Information from Association of State and Provincial Psychology Boards (ASPPB), and Possible Regulatory Amendments to Title 16, California Code of Regulations sections 1388-1389.1 (Exams)

Background:

The Board's Examination for Professional Practice in Psychology Part 2 (EPPP2) Task Force, chaired by Dr. Sheryl Casuga (Chair), was formed to consider the benefits and drawbacks of the proposed examination to the Board, prospective licensees, and consumers, eligibility criteria, the application process, and the impact on the Board's process for licensure and to assist the Board in promulgating regulations. The Task Force had two meetings, April 5, 2018 and June 29, 2018, and a full report of the Task Force's discussions, concerns, and recommendations are attached for the Board's review.

A summary of the EPPP2 Task Force's recommendations are as follows:

The Task Force does not believe the EPPP Part 2 is in the best interest of California consumers for the following reasons:

- Lack of a proven necessity for the additional examination;
- Considerable concerns related to the examination design's ability to assess skills and thus potentially providing negligible consumer protections;
- The additional examination's additional costs and burden on prospective licensees, and especially on historically underrepresented and socioeconomically disadvantaged students; and
- The additional examination's creation of new barriers to licensure and potentially detrimental impact on access to psychological services to California consumers.

At its August meeting, the Board discussed the pros and cons of continuing to use the EPPP as the required knowledge examination for licensure if the EPPP Part 2 was a mandatory component of the examination, but did not decide to require EPPP Part 2 as a requirement for licensure at that point.

On August 17, 2018, ASPPB released a message concerning the implementation of the EPPP Part 2 (Attachment A). Specifically, ASPPB:

- Rescinded the requirement that made the EPPP Part 2 examination a mandatory component of a single licensure exam and the mandatory implementation date of January 2020, and
- Expressed its intention to launch the EPPP Part 2 in 2020 and make it available to states and provinces interested in servicing as early adopters.

Although ASPPB's announcement clarified that the implementation of the EPPP Part 2 is now an optional component, it raised concerns on whether ASPPB was simply postponing the deadline for mandatory adoption. To determine if this was the case, the Board has asked ASPPB for clarification on whether there is an anticipated date for mandatory implementation.

The other critical issue that was not addressed in the August 17 ASPPB announcement was whether ASPPB's Board of Directors had plans to address the cost concerns with the EPPP Part 2 and whether ASPPB has plans to lower the cost of the exam.

The Board sent a letter to ASPPB requesting clarification on both points on October 2, 2018 (Attachment B).

On October 24, 2018, ASPPB released a Jurisdictional Update on the Enhanced EPPP (Attachment C) informing jurisdictions of the following:

- Clarifying that the EPPP Part 2 will be optional for jurisdictions to adopt starting in January 2020, and will continue to be optional for several years, at which point ASPPB will decide on the future direction of the national licensing examination;
- Clarifying that only applicants registered through jurisdictions that adopt the Enhanced EPPP (Part 1 and Part 2) and who have passed Part 1 of the examination may take the EPPP Part 2;
- Strongly recommending that jurisdictions that adopt the EPPP Part 2 also adopt early admittance options for all students to take the EPPP Part 1 before degree completion and will only early eligibility determinations to come from the jurisdictions; and
- Announcing the lowering of the cost of the EPPP Part 2 examination from \$600 to the following:
 - \$300 for applicants from early adoption jurisdictions (from examination launch through December 31, 2021);
 - \$450 for all applicants after January 1, 2022; and
 - \$100 for applicants that participate in the Beta Testing for the EPPP Part 2.

In summary, for the foreseeable future, the EPPP Part 2 option will be optional, early eligibility for the examination will be a jurisdictional decision and not related to APA accreditation, and the cost for the EPPP Part 2 will eventually be \$450 for all applicants regardless of when a jurisdiction adopts its use.

At the November Board Meeting, the Board agreed to send a letter to ASPPB based on the following:

- 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.

Action Requested:

The Board should consider the latest feedback from ASPPB and determine if there is any action necessary.

Attachment A: August 17, 2018 ASPPB Letter

Attachment B: October 2, 2018 Board Letter to ASPPB

Attachment C: October 24, 2018 Jurisdictional Update on the Enhanced EPPP

Attachment D: December 10, 2018 Board Letter to ASPPB



ASPPB

Association of State and
Provincial Psychology Boards

Supporting member jurisdictions in fulfilling their responsibility of public protection.

August 17, 2018

**A Message from the Board of Directors to Member Jurisdictions of the
Association of State and Provincial Psychology Boards**

Earlier this summer, I reached out to all of you to let you know that we were commencing a listening campaign to more fully understand the conversation relating to implementation details announced last October for the Enhanced EPPP. Thank you for taking the time to explore implementation implications within your jurisdictions and share your ideas, concerns, and thoughts with us.

We heard strong support for competency testing as part of the EPPP – and we still believe in it – but we also heard many unresolved concerns about our implementation plan. Be assured, our priority is not in enforcing the plan; our priority is in developing and working toward adoption of the best possible resource for you to evaluate the preparedness of new practitioners in our field.

Our unique position as an association is in the strong, trusting relationships we have built with you over the decades and our role as facilitator for you to learn, bond, and share across jurisdictions. We are here to support you in your responsibility of public protection, respecting your training and evaluative methods and your jurisdictional requirements. The adoption of the EPPP was a choice you each made over time and its universal use now allows for maximum mobility among practitioners. We are extremely proud of our role and these achievements and we will do everything we can to protect them while we improve our methods and find new ways to support you.

Based on your input this summer and our own priority-setting, the ASPPB Board of Directors on Sunday August 12, passed a motion to rescind our decision of August 2017 and announced to you in October that made the Enhanced EPPP (including both knowledge and skills portions) as the single licensure exam offered by the ASPPB. We will continue toward launch of the Enhanced EPPP in 2020 and make it available to states and provinces interested in serving as early adopters. We are lifting the requirement for use of the Enhanced EPPP and are lifting the deadline for implementation.

We have heard the concerns you have raised about the cost of the examination and the early admittance option to take the knowledge portion of the test at the completion of academic coursework (excluding research, practicum or internship). We are looking forward to continued discussion with you about these aspects of the implementation of the Enhanced EPPP.

We are in a culture of competency and accreditation standards have changed already. We know that your jurisdictions have processes in place to assess competency and we are confident that unqualified people are not being awarded unearned credentials. As stated earlier, our goal is to provide the best possible resource to you to evaluate your candidates. All jurisdictions will continue to receive detailed information about the nature, content, validity, and utility of the Enhanced EPPP as that information becomes available during 2020 and beyond.

We thank you for your candid and constructive responses this summer and we remain open to your ideas and concerns as we move forward to improve our testing resources. We welcome your feedback now, and we hope you will join us and continue this discussion in October when we gather in Salt Lake City at our Annual Meeting.

Sincerely,

Sharon Lightfoot, PhD
President, ASPPB Board of Directors
lightfootphd@sbcglobal.net
314-289-9981

President, Board of Directors – Sharon Lightfoot, PhD | Chief Executive Officer – Stephen T. DeMers, EdD

215 Market Road • PO Box 849 • Tyrone, Georgia • 30290 • (678) 216-1175 • www.asppb.org

October 2, 2018

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

Dear Board of Directors:

Thank you for the continued engagement concerning the implementation of the Enhanced Examination for Professional Practice in Psychology. At the Board of Psychology's (Board's) August 17, 2018 meeting, the Board requested a response from ASPPB regarding the 2020 deadline for implementation of the Enhanced EPPP and concerns about its affordability. ASPPB released a message on that same day concerning the implementation of the Enhanced EPPP. Specifically, ASPPB:

- Rescinded the requirement that made the Enhanced EPPP examination a mandatory component of a single licensure exam and the mandatory implementation date of January 2020, and
- Expressed its intention to launch the Enhanced EPPP in 2020 and make it available to states and provinces interested in serving as early adopters.

We deeply appreciate ASPPB hearing the concerns of the Board and delaying implementation of the Enhanced EPPP. The above points appear to clarify ASPPB's intentions as follows: 1) that the implementation of the Enhanced EPPP is no longer mandatory, but now an optional examination for those states interested in implementing the Enhanced EPPP, and 2) that the January 1, 2020 implementation is no longer mandatory.

First, while well-received, this announcement created confusion as to the duration of the delayed implementation. Specifically, we seek 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.

Second, the Board remains concerned about the costs of the exam to prospective licensees. Your announcement in August did not directly address this issue. This continues to be a key area of concern raised by the Board's EPPP Part 2 Task Force, a point which was reiterated at the Board's August 2018 meeting. This concern stems from the impact the 100 percent increase in examination fees would have on consumer access to psychological services, particularly in areas serving vulnerable populations, and the impact on prospective licensees who may already be feeling the pressure of substantial financial burdens for their graduate education and training. The last letter received from Dr. Matt Turner, writing on behalf of ASPPB, stated:

“ASPPB is considering options to decrease hardship associated with increased fees to candidates but no decisions have been made.”

The Board would appreciate greater clarity on this issue. Does ASPPB have plans to lower the cost of the Enhanced EPPP, or provide scholarship opportunities? The Board is interested in the anticipated cost and the available options to decrease hardship.

Our next Board meeting is scheduled for November 15 and 16, 2018 in San Diego, CA. We respectfully request a response to these two concerns prior to that date if possible in order to illuminate the Board's discussions about the possible adoption of the Enhanced EPPP and to inform the regulatory process

If you have any questions, please do not hesitate to contact Antonette Sorrick, Executive Officer, at Antonette.Sorrick@dca.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to be 'S. Phillips'.

Stephen Phillips, JD, PsyD
President, Board of Psychology

A handwritten signature in blue ink, appearing to be 'Seyron Foo'.

Seyron Foo
Public Member, Board of Psychology



Supporting member jurisdictions in fulfilling their responsibility of public protection.

Jurisdictional Update on the Enhanced EPPP

October 24, 2018

Dear Membership,

It was wonderful to see many of you in Salt Lake City at the Annual Meeting. We hope you enjoyed smooth sailing on your way back home, and we wish all of our membership a happy and healthy autumn.

As we move forward together, we would like to provide you a summary of recent Board of Directors decisions regarding the Enhanced EPPP. This information is a review of what we discussed at the Annual Meeting.

- 1) We have rescinded the August 2017 decision which made the Enhanced EPPP (including both knowledge and skills portions) the single licensure exam offered by the ASPPB. There are now two exam options.
- 2) **Option One** is for jurisdictions to continue to use the current EPPP, a standardized assessment of the knowledge needed for independent practice, with jurisdictions determining their own method of assessing the skills needed for independent practice.
- 3) **Option Two** is to use the Enhanced EPPP, which will be available in January, 2020. The Enhanced EPPP will be one exam with two parts: the current EPPP, the standardized assessment of knowledge and the Part 2 of the EPPP, the standardized assessment of skills.
- 4) An applicant must pass the knowledge portion of the exam (the current EPPP) prior to taking the skills portion of the exam (the Part 2 of the EPPP). The skills exam will not be offered as a stand-alone exam
- 5) Only applicants who are registered through a jurisdiction that has adopted the Enhanced Exam, and who have passed the knowledge portion of the exam, will be allowed to take the skills portion of the exam.
- 6) January 1, 2020 through December 31, 2021 is designated as an **early adoption period**. All jurisdictions who decide to adopt the Enhanced EPPP *at any point during this time frame* will be offered reduced fees for their applicants.
- 7) **Fees for the skills portion of the exam**, not including test center and jurisdictional fees will be:
 - a. \$300 for early adopters – from exam launch through December 31, 2021
 - b. \$450 as of January 1, 2022
- 8) **ASPPB Exam Fees for Beta Testers**, not including test center and jurisdictional fees will be:
 - a. \$100.00

- 9) Beta testing is commonly used for professional licensing exams and ASPPB has conducted Beta Testing in the past for both the EPPP and the PEP. One of the goals of beta testing is to assess how each item performs. Typically, many items are found to be psychometrically sound and are included in the applicant's score, while some items do not perform well and are discarded. Because of the need to assess items, longer examinations are given during the beta testing time frame. Items that do not perform well are not used to determine a candidate's score.
- 10) Beta testers: Approximately 150 initial test-takers will be "beta testers." Beta Testing will occur for approximately two months starting at exam launch. Beta testers **do** receive an exam score; however, they may need to wait a bit longer than is now typical to receive their score.
- 11) One of ASPPB's commitments is to strive towards best practices and consistency in regulation. Towards that end we anticipate that as jurisdictions adopt and gain experience with the Enhanced EPPP, they will come to see its value, such that at some point, as was the case with the EPPP, all jurisdictions will adopt it as the licensure exam for psychology. You can expect continued support from ASPPB in your efforts to implement the Enhanced EPPP. After several years of experience of jurisdictions using the Enhanced EPPP (2022), the ASPPB Board of Directors will evaluate that experience and decide on future directions for the national licensing exam. That decision will not be made in isolation and without the ongoing input of our member jurisdictions.
- 12) ASPPB strongly supports an early admittance option which would allow students to take the knowledge portion of the EPPP (Part 1) pre-degree -- after completion of all academic coursework excluding internship and research. The early admittance option will only be allowed for candidates who are registered through an Enhanced EPPP jurisdiction and is not limited to those coming from accredited programs, rather it is the jurisdictions that will make the determination of eligibility.
- 13) Enhanced EPPP jurisdictions will decide whether they will allow for this option. Students will need to check with jurisdictions to see if they will allow for an early option and if they will accept EPPP scores if taken early.
- 14) More information about the Enhanced EPPP can soon be found on the ASPPB web site at <https://www.asppb.net/page/EPPPPart2>.

Sincerely,

Sharon Lightfoot, PhD
President, ASPPB Board of Directors
lightfoot@sbcglobal.net

December 10, 2018

Association of State and Provincial Psychology Boards (ASPPB)
215 Market Road
PO Box 849
Tyrone, Georgia, 30290

Dear ASPPB Board of Directors:

Thank you for your response to the California Board of Psychology's inquiries on October 24, 2018. Your response was presented at the Board's quarterly meeting on November 16, 2018. Based on the resulting discussion, the Board has continuing concerns that would benefit from further clarification from ASPPB. They are 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.

Your responses will be provided at the Board meeting following receipt of your response. The 2019 Board meeting dates are February 7-8, April 24-26, August 15-16, and October 3-4.

If you have any questions, please do not hesitate to contact our Executive Officer, Antonette Sorrick at Antonette.Sorrick@dca.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'SC Phillips', with a stylized flourish at the end.

STEPHEN C. PHILLIPS, JD, PsyD
President
California Board of Psychology