



ASPPB

Association of State and
Provincial Psychology Boards

Supporting member jurisdictions in training their responsibility of public protection.

Dear Members of the California Board of Psychology:

Thank you for your inquiry regarding the Enhanced EPPP. We appreciate the ongoing dialogue on this important issue. We hope that our responses will provide some clarity to the concerns raised in your letter.

- *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.*

Thank you for your support of a competency-based examination. We also appreciate the clarity of your explanation regarding California's position on the Enhanced EPPP. Although the ASPPB Board of Directors (BOD) believes that adding a valid, reliable, and legally defensible assessment of skills will prove valuable to jurisdictions, the BOD determined that jurisdictional use of the Enhanced EPPP will not be required during the initial implementation period. Near the end of the early adoption period, the BOD plans to revisit the implementation process of the examination and will determine whether or not to continue delivering the EPPP 1 as a stand-alone option or only to deliver the Enhanced EPPP. Given that California has specific processes and regulatory changes that must occur, we will continue to keep you apprised of the development and status of the implementation of the Enhanced EPPP. ASPPB also recognizes that these regulatory changes may take time and we will work with California to ensure reasonable notice of any changes in requirements for the EPPP.

- *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.*

In preparation for the development of the Enhanced EPPP, ASPPB staff reviewed the regulations and legislation of the ASPPB member jurisdictions. As a result of that review, we found that most jurisdictions will need little or no statutory changes; however, we understand that is not the case for all jurisdictions. While each jurisdiction will have the specific knowledge about what changes may be needed in its own rules, ASPPB Staff have developed draft language, are available to consult on possible statutory and regulation language changes, and will provide samples of draft language and language that has been used in other jurisdictions.

President, Board of Directors – Gerald O'Brien, PhD | Chief Executive Officer – Mariann Burnett-Atwell, PsyD

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- *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.*

The ASPPB BOD heard members' concerns regarding the cost of the EPPP Part 2 and re-evaluated the cost plan. Beginning January 1, 2022, the cost of the EPPP Part 2 will be \$450 for all jurisdictions, rather than \$600 as initially proposed. In addition, jurisdictions that adopt the EPPP part 2 between January 1, 2020 and December 31, 2021 will have a reduced fee (between \$100 and \$300) during this early adoption period.

- *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.*

Beta testing data from participating jurisdictions will be provided to all member jurisdictions. This information will include data from the Standard Setting process that evaluates the pass point, pass rates, and item level psychometric data. The steps to develop these data will follow the standard procedures used to develop a licensing examination as recommended by the American Educational Research Association, The American Psychological Association, and the National Council on Measurement in Education.

With regard to external validity measures, ASPPB is not conducting these evaluations. External validity is not the standard for development of any licensure exam of any profession, and to the best of our knowledge, very few studies exist that even attempt to assess external validity of a licensing examination. As we mentioned to your Task Force on the EPPP, the primary difficulty with demonstrating external (criterion-related) validity is that establishing an appropriate reliable criterion for which to measure the test is extremely difficult (Raymond & Leucht, 2013). For example, supervisor ratings are known to be unreliable, and direct observations likely lack the psychometric rigor of the exam itself. Therefore, attempts to provide validity data by comparing to such measures are problematic. Because of this, researchers (e.g., Kane 1982, Stocker and Impara 1995, Raymond & Leucht, 2013) have reported for decades that evaluation of licensure exams as a predictive measure is not appropriate or warranted. In fact, Stoker and Impara (p. 184) evaluated the support for criterion related measures and concluded that "at present we would concur with most of our colleagues that licensure boards should not be concerned with criterion related validity." Instead the Enhanced EPPP is constructed based on a rigorous and thorough content validity methodology that follows industry standards. The empirical basis for the use of the Enhanced EPPP is the Job Task Analysis. The 2016 job task analysis surveyed approximately 2700 practicing psychologists in Canada and the United States to determine the knowledge and skills needed for entry level practice as a psychologist. Analysis of the data resulted in the final test specifications that comprise the Enhanced EPPP

(Part 1 and Part 2). Thus, the test specifications are produced through analysis of what practicing psychologists report is required for entry-level practice. Additionally, ASPPB incorporates Subject Matter Experts (licensed psychologists) at every step of the development process to ensure that the examination accurately represents the knowledge and skills required for entry-level practice.

Thank you again for the opportunity to respond to your concerns. As always, please feel free to contact us if we can provide you additional information about the Enhanced EPPP.

Sincerely,

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References

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