

COMMENTARY

Stakeholder Concerns With the Validation of the Enhanced EPPP
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The Enhanced Examination for the Professional Practice in Psychology (Enhanced EPPP or EPPP Part 2-Skills) is a new assessment from the Association of State and Provincial Psychology Boards (ASPPB) that is in the process of being adopted as an additional exam for psychology licensure. Although concerns about the validation process for the Enhanced EPPP have been published (e.g., Callahan et al., 2020, *American Psychologist*), we believe it is important to also raise specific concerns of stakeholders regarding the adoption of this competency-based assessment. Based on publicly-available information from ASPPB, there are at least three potentially problematic issues that should be considered: (a) some of the financial burden of validation of the exam has been passed down to test-takers, (b) passing scores will be set by an unrepresentative sample, and (c) there is no clear information on how and when “Beta Candidates” scores will be calculated. It is essential that the ASPPB follow the *Standards for Educational and Psychological Testing* (2014) in its test construction and validation to ensure stakeholders are on board with implementation going forward. Recommendations for partnering with stakeholders are discussed.

Public Significance Statement

The available information regarding the validation process for the Enhanced EPPP (Part 2-Skills) from ASPPB is concerning to these authors as invested stakeholders (a recent psychology intern and internship training director). We suggest that ASPPB consider our recommendations and partner more closely with stakeholders to make the validation process more transparent.

Keywords: Examination for the Professional Practice in Psychology (EPPP), Association of State and Provincial Psychology Boards (ASPPB), licensure, validation, Standards for Educational and Psychological Testing

As readers are aware, the process for becoming a licensed psychologist is challenging and time-consuming, with doctoral programs typically taking 5–6 years to complete (Commission on Accreditation, 2017) plus postdoctoral supervision required by many states for licensure. Yet, for those individuals invested in promoting the welfare of our communities, licensure is usually worth the

challenge. There are leaks in the pipeline to becoming a licensed practicing psychologist, which may be exacerbated for individuals from diverse backgrounds. Very early in the pipeline, there have been noted differences in the PhD program application process for racial and ethnic minority students (compared to non-Hispanic White students) and LGBTQ students (compared to cisgender heterosexual

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students; Hsueh et al., in press). Program attrition is another leak (2.3% of students left their doctoral training program in 2019; Commission on Accreditation, 2019). There is evidence showing that there is greater attrition among individuals who identify as Black, African American, Hispanic/Latinx, Native Hawaiian, and other Pacific Islanders, in addition to individuals with disabilities (Callahan et al., 2018). And, some students who complete their program do not become licensed after graduation (e.g., in a survey of clinical psychology programs, programs reported a mean of 77% of their alumni becoming licensed; Council of University Directors of Clinical Psychology, 2010). One of the critical steps between program graduation and licensure is passing the Examination for the Professional Practice in Psychology (EPPP), which is a standardized assessment of knowledge that covers eight broad content areas considered to be critical for licensed psychologists to know by the Association of State and Provincial Psychology Boards (ASPPB). Note that there have been criticisms of the EPPP (e.g., Sharpless & Barber, 2009), however those are beyond the scope of this manuscript.

According to ASPPB (no date [c]), the EPPP has been the “universal standard” for assessing competence and has “served its purpose very well for over 50 years. However, adding the EPPP (Part 2-Skills) will provide a more thorough assessment of competence.” ASPPB contends that the Enhanced EPPP (Part 2-Skills, which we will refer to as the EPPP-2) will “assess applied, real world situations that psychologists face in practice” and will show what applicants “would DO in an applied setting” (emphasis retained from author; ASPPB, no date [a]). Despite these claims, ASPPB’s publicly available materials have not yet demonstrated the EPPP-2’s ability to fulfill these claims. Callahan et al. (2020) recently provided useful commentary on the validation process, and called for a “productive partnership” between test developers and stakeholders (p. 54). As invested stakeholders (a recent doctoral psychology intern and an internship training director), we would like to start the conversation with ASPPB. Like Callahan and colleagues, we are not arguing against a skills-based exam for licensure of psychologists. Rather, we would like to provide specific stakeholder concerns regarding the test validation process. Given that there are already leaks in the pipeline to licensure for professional psychologists, we would like to reduce the likelihood of an invalid assessment providing yet another barrier.

Licensure Applicants Are Paying to Assist With Test Validation

According to ASPPB, individuals in jurisdictions requiring the EPPP-2 during the validation process (“Early Adopters”) are going to be paying ASPPB to assist with test validation. Specifically, individual items are being psychometrically assessed during Beta Testing. The cost of the exam is listed as \$100 plus “test center or jurisdictional fees” for these “Beta Candidates.” As someone who will take the EPPP within the next year (AW) and an internship Director of Training preparing students for taking the EPPP (DH), we are concerned that individuals seeking licensure in Early Adopter jurisdictions are being coerced into participating in test validation. These applicants cannot obtain licensure without participation, cannot decline to take the exam, and are required to pay to participate. Critically, in a survey of early career psychologists, the average graduate school debt load was

\$99,023.40 (Doran et al., 2016) suggesting that individuals applying for licensure are already facing financial hardship.

According to ASPPB’s own implementation plan, “ASPPB will develop a robust item bank, will create exam policies and procedures, and will develop multiple exam forms. ASPPB will then conduct beta testing for the new exam, and use the results of that testing to help create the final forms” (ASPPB, 2019, p. 11). Requiring licensure candidates to pay for and pass an exam that has not yet been validated is inconsistent with ASPPB’s implementation plan and with standards of test construction and development expected of our field (see AERA et al., 2014; herein the *Standards*).

Unrepresentative Sampling for Norms

Disclosure and transparency about the Standard Setting process with regard to sampling is also necessary not only for standard-setting, but also for stakeholder buy-in. According to the *Standards*, “cut scores defining categories with distinct substantive interpretations should be informed by sound empirical data” (Standard 5.23). As Callahan et al. (2020) point out, ASPPB is exclusively relying on “convenience sampling . . . dependent upon a cohort of applicants from early adopter jurisdictions” (p. 56). The sample that ASPPB would be using to validate the exam—and that states would likely use to set their pass/fail scores—would then consist only of those who can afford to pay to take the test in early adopter locations. When comparing locations of accredited doctoral training programs and internship sites (see Callahan and Watkins (2018, p. 215) for mapped location of sites) with the early adopter locations of Arizona, Georgia, Guam, Nevada, Newfoundland/Labrador, Prince Edward Island, and Manitoba (ASPPB, 2020a, 2020b), it is clear that these sites do not geographically represent where psychologists are living as they finish training. Based on available information, it is not clear how ASPPB can ensure that the sample will be representative geographically, culturally, ethnically, etc. of everyone seeking licensure in the US and Canada. Concerns regarding the construct-irrelevant variance (i.e., influence of demographic variables) on pass rates for the EPPP have been raised (Sharpless, 2019a, 2019b), with results suggesting that being Black or Hispanic is associated with increased likelihood of failing the exam during the first attempt compared to those who are White or Asian. Thus, it is critical that our field—which emphasizes training in creating and evaluating psychometrically sound instruments (e.g., assessment psychometrics is an area of core competency for professional psychologists, Kaslow et al., 2009)—use acceptable practice for creating and validating a test relatively free from bias.

Unclear Timeline for Receiving Scores

ASPPB has not disclosed when “Beta Candidates” will receive their official scores after taking the exam. This will have a significant impact on those entering the field. After Callahan et al. (2020) was published, ASPPB updated their Frequently Asked Questions (FAQs) and reported “there will be a delay before candidates receive their scores” (ASPPB, 2020a, 2020b). According to the *Standards* (Standard 8.8), “When test scores are used to make decisions about a test taker . . . , the test taker should have timely access to a copy of any report of test scores and test interpretation.” After “Beta Candidates” pay to take the EPPP-2, the final step of the validation process will be Standard Setting (ASPPB, no date [b]), and ASPPB has yet to define specifics of this process. They provide basic

information (ASPPB, 2020a, 2020b), which includes examining how each item performs in beta testing, along with expert review.

As stakeholders, this leaves us very curious about the timeline for receiving exam scores. Will “Beta Candidates” who pay \$100 plus fees have to wait until Beta Testing closes, items are analyzed, and analyses are complete? What will this mean for the length of time to obtain one’s license? Increasing the time toward licensure can cause potentially significant financial and emotional repercussions for license applicants (Robiner et al., 2010). What if beta testing suggests that a large number of items do not “perform well?” Will “Beta Candidates” receive scores at all? Will the test have to be retaken, or will “Beta Candidates” be exempt (which then raises the question of why they had to take the test at all)?

Conclusion and Recommendations

ASPPB has publicly stated, EPPP-2 “will provide a valid, reliable and legally defensible measure for regulators to assess their candidates’ demonstration of a universal standard of skills” (no date [c]). It would be ethically irresponsible to use a test that has not met these standards for assessing licensure candidates. According to APA’s Ethical Principles of Psychologists and Code of Conduct, “psychologists who develop tests... use appropriate psychometric procedures... for test design, standardization, validation, reduction or elimination of bias, and recommendations for use” (9.05, Test Construction; American Psychological Association, 2017). It is imperative that ASPPB complete validation of the test *before* it is used for any credentialing decisions, and it is essential that public statements made to stakeholders, including test takers and jurisdictions, accurately reflect that validity and reliability standards have not yet been met.

The plan for validation of the EPPP-2 is concerning to us as invested stakeholders. Although there are other questions that we could raise (for example, how will ASPPB provide evidence for whether responses to EPPP-2 items predict real-world behaviors, which they claim the exam will assess?), we raise three critical potentially ethical concerns here: (a) some of the financial burden of validating the exam has been passed down to the test-takers themselves, (b) passing scores will be set by an unrepresentative sample, and (c) there is no clear information on how and when “Beta Candidates” scores will be calculated. Despite these concerns, there is still time for ASPPB to amend their plan and collect data on the EPPP-2 in a way that provides evidence for proper validation. We are trusting ASPPB to set the standards for what entry-level psychologists should know and apply. It is imperative that ASPPB be held to the same standards we hold ourselves to as psychologists, who are not only stakeholders, but also experts in test construction and validation. Consistent with Callahan et al. (2020), we strongly encourage ASPPB to partner closely with stakeholders and reconsider their plan. We hope that ASPPB will be receptive to our efforts to initiate this important conversation.

We recommend ASPPB conduct beta-testing before EPPP-2 is required by any licensing board to ensure that (a) there is no coercion during the test construction phase, (b) a diverse and representative sample is used for test validation, (c) the public representation of the process is transparent and accurate, and (d) the tests used for setting standards for entry into our field meet ethical standards (9.05; American Psychological Association, 2017). This approach would be consistent with the *Standards* and with the outlined original implementation plan noted by ASPPB. Additional considerations could be including beta testing at no cost to licensure applicants completing the EPPP-1

(consistent with their process for evaluating items for Part 1) or working with graduate student and internship stakeholders to obtain a voluntary sample of those entering the profession in the near future.

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