



To: APA Board of Directors

From: American Psychological Association of Graduate Students  
(Thru Christine Jehu, PhD, Chair)

*and*

Committee on Early Career Psychologists

(Thru Le Ondra Clark Harvey, PhD, and Kimberly L. Smith, PsyD, Co-Chairs)

CC: Nabil El-Ghoroury, PhD, Director, APAGS  
Eddy Ameen, PhD, Director, Office on Early Career Psychologists  
Mauren O'Brien, Deputy Executive Director, Governance Office

Re: Proposed EPPP Step 2

Date: June 17, 2016

As you may know, the Association of State and Provincial Psychology Boards (ASPPB) recently announced to the public that concrete plans are underway to develop a second licensing exam for psychologists – the EPPP Step 2 – which would be focused on assessing skills and competencies. This plan has direct consequences for most graduate students in health service provider subfields, and some early career psychologists who have not yet pursued licensure. Therefore, APAGS and CECP (which report directly to you) feel that it is prudent to document the following concerns which have been raised by our constituents and discussed amongst our committees. Our attempt to outline these concerns is not an implicit endorsement of the proposed EPPP Step 2. Please note that above all, we frame these concerns in recognition of our collective ethical and moral responsibility to train **competent** psychologists to treat a vulnerable public; indeed, we are supportive of the assessment of competency in general. We also frame these concerns in respect for the longstanding and collaborative relationship that APA and ASPPB hold, as well as the work that ASPPB has done to streamline various aspects of licensure, and its willingness to engage with students and early career psychologists about the implications of the EPPP Step 2.

We respectfully ask for your attention to these concerns and also that you consider communicating with ASPPB about them on behalf of your student and early career constituencies.

### ***Reconsideration of Current EPPP***

An additional exam, and the associated costs that come with it, without other changes in the process, are not ideal for trainees who plan to become psychologists. We believe that the

introduction of a new exam that assesses applied knowledge in different domains than those knowledge content areas assessed currently on the EPPP demonstrates a possible lack of consensus in the field about which domains are important for a competent psychologist to practice without harm to the public. We would like to see ASPPB set up a committee with external stakeholders to review the content and scope of the EPPP and to put on the table multiple possibilities, such as shortening the existing EPPP, bridging the content areas between Steps 1 and 2 in concert with accreditation requirements, and possibly merging Steps 1 and 2 into a single exam.

### ***Test Development***

We would like to know the data on the validity of exams such as the proposed EPPP Step 2. The ASPPB website currently has references for the history of the competency movement, but does not list references for the type of exam it hopes to develop.

We are concerned that the time frame for the test development is fast; and that, in an effort to reach the completion date goal, the test may not be as fully developed or as valid as it could be with more time.

We are further concerned with the history of marginalized and underrepresented groups having lower scores on high-stakes testing. Specific to the EPPP, Sharpless and Barber (2013) found associations between percentage of minority applicants in a program and the school's EPPP performance. APAGS, working with OEMA, last year collected and preliminarily analyzed first passage of the EPPP among early career members of APA; unpublished findings show statistically significant differences in pass rates and number of times taking the EPPP by race/ethnicity. Therefore, we request that test development ensure that no groups are systematically negatively impacted by the existence of the EPPP Step 2.

### ***Cost***

The cost of the current EPPP is \$687 in most jurisdictions. This is substantial to graduates who may owe a median debt of up to \$200,000 (Doran et al., 2016). Students have reported that finances are the #2 stressor they face in graduate school (El-Ghoroury et al., 2012). We are mindful that trainees are often paying for these examinations on borrowed money or on top of substantial debt, so any sizeable fees for additional examinations are likely to cause hardship and/or distress, particularly when one considers the associated costs of the examination (lost productivity due to studying and taking the exam, examination prep materials, etc.). In fairness to the next generation of psychologists, we believe the cost of the EPPP Step 2 needs to be *as low as possible*, with serious consideration given to cutting costs in other areas as well (e.g., current EPPP).

### ***Sequence of Examinations and Training***

The EPPP typically is administered after the doctoral degree has been awarded and all requirements for licensure have been completed, including postdoctoral requirements in over 35 US jurisdictions. ASPPB proposed the EPPP Step 2 be administered after the first exam without

officially requesting that the EPPP “Step 1” be moved earlier in the training sequence. Olvey, Hogg, and Count found in 2002 that “psychologists are clearly the top-of-the-line in terms of requirements for licensure” and that relative to other doctoral level disciplines we have “a protracted period of preparation coupled with incomes that are not commensurate with training.” A second exam, without moving the first earlier in the timeline of psychologists’ training, will delay licensure and psychologists earning ability.

We strongly recommend that applicants have the option to take the EPPP Step 1 (the knowledge based exam) as soon as possible after completing coursework, and ideally before internship. This would put the EPPP Step 1 in line with the United States Medical Licensing Examination (USMLE) Step 1 knowledge based exam, and would place the exam substantially closer to when coursework had been completed. Given that length of time from graduation is positively associated with a higher fail rate (Schaffer et al, 2012), moving the EPPP Step 1 before internship should substantially increase the pass rate of first-time test takers. We would then ask that the EPPP Step 2 be administered as part of the application process (occurring post doctorate).

In moving the EPPP Step 1 pre-graduation, we are mindful that this change cannot happen in isolation. APA would need to engage in conversations with the Board of Educational Affairs and the Council of Chairs of Training Councils to ask they work with training programs to ensure that (a) the test is introduced as a learning objective from early on in training; and (b) that efforts will be made for graduate institutions or departments to absorb the costs of the test, even if other fee structures like per-institution packages are needed with ASPPB to facilitate this. We would like the training community to seriously weigh the pros and cons of allowing the EPPP to substitute for a program’s existing qualifying or comprehensive examinations, and what alternate paths or mitigated negative implications may be needed for students who do not plan to seek licensure if and when the EPPP does replace a program’s comprehensive exams.

Finally, if a clinical competency exam such as the EPPP Step 2 becomes adopted, APAGS and CECF strongly encourage ASPPB and jurisdictions to adopt the APA policy on sequence of training, recommending the completion of the doctorate as entry into general practice. Functionally, this would mean that training prior to the internship could be counted towards hours required by jurisdictions for licensure, and would eliminate the need for a full year of postdoctoral supervised experience. This would allow licensure to occur sooner and would designate the postdoc as natural place to receive high access to specialty training.

ASPPB’s adoption and promotion of this sequence would also translate to substantial positive financial implications for *new* graduates, who are able to work as licensed psychologists shortly after graduation. They would also be eligible for other financial breaks, such as applying to the National Health Service Corps Loan Repayment Program a year earlier. Such changes to the licensure processes would make the addition of the EPPP Step 2 much more bearable and also put psychology’s licensure process in line with that of many comparable professions.

### ***Test Preparation***

We are concerned that the EPPP Step 2 is being developed without appropriate training for students in the pipeline. It is unfair to pose a test to students without training materials and information to the education and training community. Therefore, implementing a test would need to come after materials were distributed to the training community so that rising psychologists would be aware of the exam and have experience with components of the exam. Distributing these materials widely also provides accurate informed consent to students entering the psychology pipeline.

### ***Generous Grandparenting Periods***

The current challenges and inconsistencies of licensure mobility are problematic for both the workforce and the public. We are deeply concerned that an additional examination requirement would serve as a hurdle for already licensed psychologists. We would like APA and ASPPB to serve as leaders to jurisdictions in communicating the importance of honoring existing commitments to licensure so that psychologists already licensed in one state for a period of time do not ever need to take the EPPP Step 2 as a requirement for licensure renewal or as a requirement for licensure application in another state.

On behalf of our committees and our constituents, we thank the Board for its attention to these concerns and its general advocacy for the next generation of psychologists. We look forward to receiving your response and anticipate the conversations you may have with ASPPB.