

## Georgia Psychological Association of Graduate Students Position Statement on the EPPP 2

The Georgia Psychological Association has been informed that the Georgia Board of Examiners of Psychologists has proposed an amendment to the Rule regarding the Application for Licensure. The changes involve adopting the EPPP 2 or the Enhanced EPPP as a requirement for licensure. The EPPP 2 is an additional component of the EPPP that will be a skills-based assessment that includes questions about applied, real world situation that psychologists face in practice. The original EPPP will continue to focus on knowledge. More information about the EPPP 2 can be found here:

<https://www.asppb.net/page/EPPPPart2-Skills>

The Georgia Psychological Association of Graduate Students opposes the early adoption of the EPPP 2 due to concerns including the validity of the test, inequitable pass rates for marginalized applicants, mobility concerns, and cost of the exam. You can read their full statement to the Board of Examiners below.

We encourage individual GPA members to attend the public hearing on this amendment to Rule 510-2-.01 on December 20, 2019 at 12:15pm at the Office of the Secretary of State. More information can be found here: [http://sos.ga.gov/index.php/licensing/plb/44/psychology\\_proposed\\_rules2](http://sos.ga.gov/index.php/licensing/plb/44/psychology_proposed_rules2)

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To: The Georgia Board of Examiners of Psychologists  
From: The Georgia Psychological Association of Graduate Students

### Georgia Psychological Association of Graduate Students Position Statement on the EPPP 2

Recently, the Georgia Board of Examiners of Psychologists has considered becoming an early adopter of the “Enhanced Examination for the Professional Practice of Psychology” (Enhanced EPPP; EPPP Part 2). There are many concerns that have been voiced on a national level regarding the EPPP Part 2 by primary stakeholders including graduate students, early-to-late career psychologists, educators, and members of APA governance. Some of the primary concerns include barriers to licensure, inequitable pass rates for marginalized applicants, mobility concerns, reason for an additional exam, and cost of the exam.

The Georgia Psychological Association of Graduate Students (GPAGS) shares these concerns and does not believe that the EPPP Part 2 is in the best interest of Georgia consumers for the following reasons:

- **Lack of a proven necessity for the additional examination.** While ASPPB has stated some reasons for creating an additional exam, there is ongoing concern by training groups regarding the need for another exam, given the comprehensive requirements of

APA Accredited Doctoral Psychology programs and the competencies they ensure each graduate student meets. There are questions regarding the need to use yet another exam that places considerable burden and responsibility on new graduates in order to prove competencies that have already been approved by their APA Accredited institution.

- **Considerable concerns related to the examination design's ability to assess skills and thus potentially providing negligible consumer protections.** Because the EPPP Part 2 exam has yet to be subjected to a broader validation process, there is concern that a standardized examination would accurately assess the functional skills necessary for independent practice. For instance, it lacks the several types of validity evidence, including both accuracy and appropriateness indices (Callahan, Bell, Davila, et al., 2019). Without the fuller involvement of psychological experts, and peer review, the development process for the Part 2 exam is less sophisticated and comprehensive than similar undertakings in other health care professions.
- **The lack of validation may differentially affects historically underrepresented and socioeconomically disadvantaged students.** Further, there is a lack of information regarding the pass rates for test takers who have sat for the original EPPP and who hold a number of marginalized identities (Sharpless and Barber, 2013). From the information we do have, there is considerable concern regarding ethnic minority pass rates, and ongoing questions regarding this future Enhanced EPPP (Part 1 + Part 2) exam and pass rates for test takers with marginalized identities.
- **The additional examination's further costs and burden on prospective licensees,** While there has been a plan for minimal reduction in fees for states that agree to require the EPPP Part 2 exam, the total cost for both the EPPP Exams after beta testing will be \$900-\$1050 (depending on the testing date). This fee does not include preparation materials. We remain concerned about how this may impact the decision to come into the field, as well as the mounting financial burdens associated with becoming a psychologist (Doran, Kraha, Marks, Ameen, El-Ghoroury, 2016).
- **The additional examination's creation of new barriers to licensure and potentially detrimental impact on access to psychological services to Georgia consumers.** Variations in the requirements for the EPPP Part 2 across states is likely to negatively influence psychologists' professional mobility. This may deter psychologists from moving to Georgia and may particularly affect service in rural communities that already struggle to have enough qualified mental health professionals to provide sufficient care.

**GPAGS recommends the following:**

1) that the Georgia Board of Examiners of Psychologists refrain from adopting the Enhanced EPPP.

2) that the Georgia Board of Examiners of Psychologists closely monitor future developments including emerging data regarding the EPPP Part 2. Specifically, we ask the Board

to request from ASPPB data to substantiate the need for the EPPP Part 2 as well as evidence of its effectiveness in reliably and validly assessing relevant skills and competence. The ASPPB should be required to make data on the EPPP Part 2 data public to allow for independent research and validation. These data should be used in considering the costs and benefits of potentially adopting the EPPP Part 2 in the future.

3) that the cost of the examination be further examined to alleviate financial burden on students, postdocs, and ECPs with limited resources.

We are thankful for your time and consideration, and we look forward to your response.

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Callahan, Jennifer & Bell, Debora & Davila, Joanne & Johnson, Sheri & Strauman, Timothy & Yee, Cindy. (2019). The Enhanced Examination for Professional Practice in Psychology: A Viable Approach?. 10.1037/amp0000586.