



LOUISIANA STATE BOARD OF EXAMINERS OF PSYCHOLOGISTS

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Board of Directors
Association of State and Provincial Psychology Boards
P.O. Box 3079
Peachtree City, GA 30269

Re: Examination for Professional Practice in Psychology (EPPP)

Dear ASPPB Members:

I am writing on behalf of the Louisiana State Board of Examiners of Psychologists (LSBEP). The members wish to thank Dr. DeMers for attending our April meeting. We appreciate ASPPB's efforts to educate and clarify aspects the development of a second exam of the Examination for Professional Practice in Psychology (EPPP).

The following concerns remain for the LSBEP:

1. The LSBEP must ensure that any changes and additional barriers to licensure are supported by data suggesting necessity for protecting the public. LSBEP does not believe data exists demonstrating that psychologists are not already held to high standards of competence. The data that exists in terms of complaints and disciplinary actions towards psychologists also does not support the theory that competency problems abound in the field of psychology. In fact, ASPPB's own data regarding complaint patterns notes that "Incompetence" is not even among the top 10 reasons psychologists were disciplined in 2016 (the most recent year of date reported). Moreover, reported disciplinary action (for any reason) has steadily decreased since 2013. Nationwide, ASPPB reported that only 12 licenses were revoked in both 2015 and 2016. These numbers are exceedingly low and do not suggest that public safety is in question. Therefore, LSBEP is not convinced that another exam is justified by the current data. Prior to instituting additional barriers to the process of licensure by the LSBEP, clear rationale must be presented for their necessity.
2. Louisiana, and the rest of the country, is currently experiencing a strong anti-regulatory climate. LSBEP remains concerned that any additional barriers to practice would be viewed as marketplace restriction. LSBEP strongly believes Louisiana legislators would disapprove of additional hurdles restricting practice, and that sufficient data does not exist to support the necessity of additional hurdles.
3. ASPPB suggested that the addition of the EPPP-2 (or, the "Enhanced EPPP") would bring the profession of psychology in line with medical training. It is the opinion of the LSBEP that psychologists are inherently different from physicians. Moreover, from a financial standpoint, the starting salary and potential earning power of a psychologist is far less than the average physician. LSBEP has concerns that an additional test (with accompanying fees) would result in an undue burden for early career professionals, who carry the most debt and have the least earning power. Any comparison between licensing test fees and physicians needs to be qualified by

acknowledging this salary discrepancy. The LSBEP does not support changing the field's licensing path based on the model of another profession.

4. Psychology has long held itself as the profession with the most expertise surrounding test design and construction. We are uniquely qualified to create and implement assessments. We are trained that tests are not used prior to establishing validity and reliability. Changing statutes and rules preemptively before we know that the test is necessary and valid is not prudent and would prevent us from choosing another, perhaps better, exam from another vendor.

5. ASPPB is a vendor providing a product (EPPP) for states to use for their licensing exam. ASPPB is not a regulating body and has no jurisdiction in Louisiana to make decisions regarding licensing. Further, the role of advocating for the profession is that of national, state or regional professional organizations/associations. LSBEP considers ASPPB's ongoing attempts to insert themselves into the regulation and practice of psychology an overstep. We are concerned that ASPPB has lost sight of their original mission, which from this board's understanding was limited to facilitating communication between various member jurisdictions. Currently, ASPPB states that their mission includes "offering" products and "enhancing" services. However, it appears that ASPPB will market the EPPP-2 as a mandatory addition to the already existing EPPP-1. LSBEP has concerns that this will not allow individual member jurisdictions the ability to choose from a vendor which products they feel are necessary to incorporate into their licensing procedures.

6. Removing a state's jurisdictional authority to determine who can sit for the EPPP is unacceptable for Louisiana. LSBEP's current statutes read that applicants must be approved to take the EPPP by the LSBEP. LSBEP does not have the authority to circumvent its statutes. Further, LSBEP recently revised its statutes and rules in 2015 to create a provisional license and allow for early admittance (after the completion of one year of supervised practice) to the EPPP. LSBEP does not see a need to change this statute or allow people seeking initial licensure in Louisiana to obtain entry to the licensing exam without approval from the board. In fact, LSBEP agrees with statements made by internship training directors, that the time it will take for an intern to study and prepare for the EPPP would distract from their internship training.

7. LSBEP also agrees with previous concerns presented by New York state regarding the process of this test development. LSBEP does not feel the process has included direct member jurisdiction involvement. LSBEP has not been asked at any time to provide feedback on whether an addition to the licensing exam is necessary.

In closing, LSBEP appeals to ASPPB, whose mission it is to support its member boards, and not as a vendor providing a product (EPPP) for states to use for their licensing exam. As current customers of this product, we strongly urge ASPPB, to offer the EPPP-2 as an optional test that states can contract for on an as-needed basis.

Sincerely,



Jaime T. Monic
Executive Director

cc: BARC Listserv