

TEXAS STATE BOARD OF EXAMINERS OF PSYCHOLOGISTS



Ryan Bridges, Chair

Herman B. Adler, M.A.

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Sangeeta Singg, Ph.D.

Andoni Zagouris, M.A.

Cristina De Luna
Board Administrator

Texas State Board of Examiners of Psychologists Meeting Agenda Thursday, May 7, 2026 10:00 a.m.

The May 7, 2026 meeting of the Texas State Board of Examiners of Psychologist will be held by videoconference call, as authorized under Texas Government Code section 551.127. One or more Board members may appear at the scheduled meeting via videoconference call, but the presiding member will be physically present at 1801 Congress Ave., Ste. 7.102, Austin, Texas 78701. In the event of internet connectivity problems, the physical meeting location will be moved to 1801 Congress Ave., 7.301, Austin, Texas 78701. These alternate locations will be open to the public, but seating is limited to first come, first served. Due to the size of these alternate meeting rooms, public seating will be limited by their relative occupancy ratings.

Members of the public are encouraged to access and participate virtually in this meeting by entering the URL address <https://us02web.zoom.us/j/84525314865> into their web browser. Telephone access numbers and additional videoconference call access information can be found in the attached addendum. An electronic copy of the agenda and meeting materials will be made available at www.bhec.texas.gov prior to the meeting. A recording of the meeting will be made available on the Council's YouTube channel after the meeting is adjourned. To obtain a copy of the recording, please contact the Council's public information officer at Open.Records@bhec.texas.gov.

For members of the public wishing to give public comment, once the public comment item is reached on the agenda after the meeting convenes, the presiding member will allow those who are attending in person to give public comment first and then ask those joining by computer to use the "raise hand" feature to indicate who would like to make a public comment. Those individuals who raise their hand will then be unmuted to give public comment. Once all individuals with raised hands have been given an opportunity to make public comment, the individuals appearing by telephone will be unmuted and asked whether they would like to make a public comment. Please note that public comments are not intended for a discussion or a question-and-answer session with the Board. Additionally, when making a public comment, please identify yourself and whether you are speaking individually or on behalf of an organization. All public comments will be limited to 3 minutes, unless otherwise directed by the presiding officer. In lieu of providing public comment during the meeting, you may submit written public comments by <https://forms.office.com/r/Ls1v21WeTp>. Only those written public comments received by 5pm on the last business day prior to the meeting will be submitted to the council members for their consideration. No written comments received will be read aloud during the meeting.

Please note that the Board may request input during the meeting from any interested parties or members of the public in attendance during its discussion of an agenda item.

1801 Congress Ave., Suite 7.300, Austin, Texas 78701

(Phone) 512-305-7700

The Texas Behavioral Health Executive Council is an equal opportunity employer and does not discriminate on the basis of race, color, religion, national origin, age, sex, disability or sexual orientation.

If you are planning to attend this meeting and need auxiliary aids, services or materials in an alternate format, please contact the Council at least 5 working days before the meeting date. Phone: (512) 3057700, TTY/RELAY TEXAS: 711 or 1-800-RELAY TX.

The board may go into Executive Session to deliberate any item listed on this agenda if authorized under Texas Open Meetings Act, Government Code, Ch. 551. The board may discuss and take action concerning any matter on the agenda and in a different order from what appears herein.

1. Call to Order.

Includes roll call and excusal of absences if necessary.

2. Welcome and announcements.

Includes items of public interest and concern.

3. Public Comment.

Comments will be received from individuals attending in person, by virtual meeting, and by phone.

INFORMATIONAL ITEMS – NO ACTIONS WILL BE TAKEN.

4. Reports on general matters.

a. Report from the Board Chair.

May include discussion of current challenges and accomplishments; lawsuits; interaction with stakeholders, state officials, and staff; committee appointments and functions; workload of Board members; conferences; and general information regarding the routine functioning of the Board.

b. Report from the Board's Delegates to the Texas Behavioral Health Executive Council.

May include discussion regarding the activities of the Executive Council, including recently proposed or adopted rules.

c. Report from the Board Administrator and other staff.

May include discussion of operations, organization, and staffing; workload processing and statistical information; customer service accomplishments, inquiries, and challenges; media, legislative, and stakeholder contacts and concerns; special projects; and general information regarding the routine functioning of the program.

d. Reports from Committees

MATTERS FOR POTENTIAL BOARD ACTION

5. Initial Review, Discussion, and Vote on Proposed Design of the Texas Psychology Licensure Examination.

6. Licensing Matters

May include discussion of licensing regulations and operations as they pertain to application processing.

a. Board review and possible action on appeal of license applications

7. Examination matters.

May include reports from the Board's jurisprudence exam vendor and discussion of exam content and format.

- a. Staff update and possible Board action regarding changes to the jurisprudence exam.

8. Enforcement matters.

May include discussion of quarterly enforcement activities, as well as discussion of agreed orders executed or cases dismissed by the Council's Executive Director.

- a. Board review and possible action regarding contested cases from State Office of Administrative Hearings (SOAH).
- b. Board review and possible action regarding agreed orders to be executed by the Board.

9. Rulemaking.

May include discussion and referral of potential rule changes to the Rules Committee, as well as discussion of the status of rule proposals sent to the Executive Council.

- a. Proposed Amendment of Rules: *Discussion and possible action to recommend proposal of new rules, amendments, or repeal of rules in Title 22 of the Texas Administrative Code:*
 - 1) §465.10 Basis for Scientific and Professional Judgments

10. Recommendations for agenda items for the next meeting.

11. Adjournment.

Addendum: Additional Videoconference and Telephone Conference Call Information

When: May 7, 2026 10:00 AM Central Time (US and Canada)

Topic: The Texas State Board of Examiners of Psychologists Full Board Meeting

Join from PC, Mac, iPad, or Android: <https://us02web.zoom.us/j/84525314865>

Phone one-tap: +13462487799,,84525314865# US (Houston) +12532050468,,84525314865# US

Join via audio: +1 346 248 7799 US (Houston) +1 253 205 0468 US +1 253 215 8782 US (Tacoma) +1 669 444 9171 US +1 669 900 9128 US (San Jose) +1 719 359 4580 US +1 646 931 3860 US +1 689 278 1000 US +1 301 715 8592 US (Washington DC) +1 305 224 1968 US +1 309 205 3325 US +1 312 626 6799 US (Chicago) +1 360 209 5623 US +1 386 347 5053 US +1 507 473 4847 US +1 564 217 2000 US +1 646 558 8656 US (New York)

Webinar ID: 845 2531 4865

International numbers available: <https://us02web.zoom.us/j/84525314865>



Commission News

VOL. 7, Issue 1

April 2026

Message from The Chair: Patrick Hyde

Fellow Commissioners, please mark your calendars for the mid-year PSYPACT Commission meeting on July 13th at 11:00 am Eastern. This will be a virtual meeting held on Zoom. There will be several important issues for discussion at this meeting. Specifically, the Commission has received comments on the proposed changes to Rule 10.2, which pertains to the annual assessments of Compact States, and this proposed rule change will be considered at the mid-year meeting. Additionally, the annual PSYPACT Commission meeting has been scheduled for November 16th through the 17th in Nashville, Tennessee. This will be an in-person meeting with a virtual option. Please be on the lookout for future travel details from PSYPACT Commission staff for this meeting, I hope to see everyone there.

Patrick Hyde
Chair, PSYPACT Commission

Staff Contact Information:

Janet Orwig
PSYPACT Executive Director
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Ashley Lucas
PSYPACT Specialist
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Gina Polk
PSYPACT Specialist
gina.polk@psypact.gov

Executive Director Update: Janet Orwig

Welcome to Spring, the season of pollen! If you are like us here in Georgia, you are looking through a yellow fog. But with the pollen comes new growth. And at PSYPACT, we continue to implement strategic plan initiatives to keep growing.

Here are just a few highlights from the first quarter:

- The PSYPACT Spotlight Directory continues to grow. We have 97% of authorization holders having their directory visible. In the first quarter, we saw almost 5,000 searches, with the top searches focused on finding authorization holders that specialize in family therapy, couples therapy, and anxiety disorders.
- We have currently issued over 19,000 Authorization to Practice Interjurisdictional Telepsychology (APITs) and over 1,200 Temporary Authorization to Practice (TAPs).
- Interest in PSYPACT continues to grow. During the first quarter, we held four presentations, set up an information booth at the APA Practice & State Leadership Conference (PSLC), and provided testimony to the New Mexico House Judiciary Committee, the Alaska House Labor and Commerce Committee, and the Louisiana Committee on House and Governmental Affairs.
- PSY went live on March 17, 2026. PSY is a closed-system AI assistant. In the first week, we had 72 users with a total of 91 conversations.

Thank you to all who have graciously volunteered to serve on PSYPACT committees. If anyone is interested in serving on a committee, please email me at janet.orwig@psypact.gov. As always, thank you for all you do for PSYPACT.

Janet P. Orwig, MBA, CAE
PSYPACT Executive Director

Upcoming Meetings

Bylaws, Rules, and Policies Review- Workgroup	4/20/2026	Requirements Review Committee	05/22/2026
Finance Committee	04/21/2026	Commission Mid-Year Meeting	07/13/2026
Training and Public Relations	04/22/2026	Annual Commission Meeting	11/16 - 17, 2026

PSYPACT Commissioners

Lori Rall
Alabama

Lorraine Smith
Maryland

David Zehrung
Pennsylvania

Heidi Paakkonen
Arizona

Amy Gumbrecht
Michigan

Peter Oppenheimer
Rhode Island

Jon Priest
Arkansas

Daniel Hurley
Minnesota

Andrea Eaton
South Carolina

Reina Sbarbaro-Gordon
Colorado

Kaye Sly
Mississippi

Rosalie Ball
South Dakota

Christian Andresen
Connecticut

Pam Groose
Missouri

Mark Fleming
Tennessee

Shauna Slaughter
Delaware

TBD
Montana

Patrick Hyde
Texas

LaTrice Herndon
District of Columbia

Glenda S. George
NMI

Brian Pederson
Utah

Mary Denise O'Brien
Florida

Maiya Baumann
Nebraska

Emily Tredeau
Vermont

Don Meck
Georgia

Gary Lenkeit
Nevada

TBD
Virginia

Jill Breitbach
Idaho

Ashley Czechowicz
New Hampshire

Phillip Hawley
Washington

Camile Lindsay
Illinois

Anne Farrar-Anton
New Jersey

Scott Fields
West Virginia

Stephen Ross
Indiana

Kate Nooner
North Carolina

Daniel Schroeder
Wisconsin

Richard Nobles
Kansas

Sara Quam
North Dakota

JoAnn Reid
Wyoming

Jeffrey Hicks
Kentucky

Karine Hray
Ohio

Mariann Burnetti-Atwell
ASPPB

Jayne Boulos
Maine

Kathleen Ward
Oklahoma

Legislation Updates:

PSYPACT currently has 43 enacted and effective participating states and jurisdictions. At this time, Alaska, Hawaii, Iowa, Louisiana, Massachusetts, and New York have active legislation.

Committee Updates:

Bylaws, Rules and Policies Workgroup:

Richard Nobles, Karine Hray, Kate Nooner, JoAnn Reid, David Zehrung

The Bylaws, Rules and Policies Workgroup met via Zoom on January 21, 2026. During this meeting standardized language was discussed. Next steps were outlined, including establishing procedures for consistency.

Finance:

Heidi Paakkonen, Daniel Hurley, Richard Nobles

The Finance Committee convened via Zoom on February 21, 2026 and March 17, 2026. During these meetings, the committee reviewed fourth-quarter financials and year-end financial statements, bank reconciliations, and discussed future investment opportunities. The committee also met with representatives from Integrated Financial Strategies, LLC, who presented investment options for PSYPACT.

Requirements Review

Gary Lenkeit, Kathleen Ward, Peter Oppenheimer,

The Requirements Review Committee meet via Zoom on February 20, 2026. The Committee reviewed PSYPACT policy and recommended additions to Policy 2.3 in reference to requesting primary source verified documents. The Committee also reviewed six APIT/TAP applicant files and made appropriate recommendations.

Rules Committee

Patrick Hyde, Don Meck, Lorraine Smith, Pam Groose, Gary Lenkeit

The Rules Committee met via Zoom on February 27, 2026. The committee reviewed public comments on Rule 10 regarding state assessment fees. Revisions to Policy 1.1 on record retention, Policy 2.8 explaining Rules 4.3 and 5.3, and new policies on data privacy (1.28) and AI (1.29) were approved for further review.

Training and Public Relations:

Lori Rall, Heidi Paakkonen, Mariann Burnetti-Atwell

The Training and Public Relations Committee met via Zoom on February 26, 2026. The committee reviewed and submitted edits for the 2025 Annual Report and received an update on marketing efforts.

Executive Board Members

Chair - Patrick Hyde

Vice Chair - Lori Rall

Treasurer - Heidi Paakkonen

Member at Large - Pam Groose

Member-At-Large - Peter Oppenheimer

Ex Officio Member - Mariann Burnetti - Atwell



PSYPACT by the Numbers

TELEPSYCHOLOGY

16,346

Active
PSYPACT APITs

TEMPORARY PRACTICE

748

Active
PSYPACT TAPs

STATE LEVEL BREAKDOWN

State	APITs	TAPs	State	APITs	TAPs
Alabama	103	9	Nevada	135	9
Arizona	379	27	New Hampshire	151	6
Arkansas	49	11	New Jersey	1092	28
Colorado	759	33	North Carolina	694	38
Connecticut	460	30	North Dakota	46	0
Delaware	135	4	NMI	1	0
District of Columbia	339	20	Ohio	565	16
Florida	1267	50	Oklahoma	67	6
Georgia	578	36	Pennsylvania	1400	45
Idaho	47	6	Rhode Island	170	7
Illinois	1320	50	South Carolina	116	6
Indiana	189	12	South Dakota	21	0
Kansas	135	10	Tennessee	301	29
Kentucky	151	7	Texas	1137	58
Maine	113	16	Utah	240	15
Maryland	1075	30	Vermont	65	2
Michigan	345	10	Virginia	938	49
Minnesota	415	9	Washington	536	24
Mississippi	49	3	West Virginia	63	5
Missouri	322	17	Wisconsin	231	11
Montana	28	3	Wyoming	17	1
Nebraska	73	4			

Active Authorizations as of 04/01/2026

2nd QUARTER PERFORMANCE MEASURES
FISCAL YEAR 2026

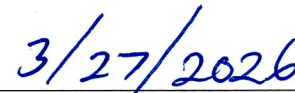
Submitted to the
Governor's Office of Budget and Planning
and the Legislative Budget Board

by

**Texas Behavioral Health Executive
Council**

March 27, 2026


Executive Director


Date

Efficiency/Output Measures with Cover Page and Update Explanation
 89th Regular Session, Performance Reporting
 Automated Budget and Evaluation System of Texas (ABEST)

3/27/2026 8:03:34AM

Agency code: 510

Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
Output Measures					
<u>1-1-1 LICENSING</u>					
1 # NEW LICENSEES ISSUED					
Quarter 1	12,000.00	3,111.00	3,111.00	25.93 %	2,400.00 - 3,600.00
Quarter 2	12,000.00	3,071.00	6,182.00	51.52 %	5,400.00 - 6,600.00
2 # LICENSE RENEWALS					
Quarter 1	34,500.00	9,636.00	9,636.00	27.93 %	6,900.00 - 10,350.00
Quarter 2	34,500.00	8,738.00	18,374.00	53.26 %	15,525.00 - 18,975.00
<u>2-1-1 ENFORCEMENT</u>					
1 COMPLAINTS RESOLVED					

* Varies by 5% or more from target.

Agency code: 510

Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
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Output Measures

1 COMPLAINTS RESOLVED

Quarter 1	500.00	158.00	158.00	31.60 % *	100.00 - 150.00
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Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY26 target for number of complaints resolved is 500, or 125 per quarter. During the first quarter of FY26, the agency exceeded its target by resolving 158 complaints. This is due to the efficiency and dedication of the investigative and legal staff.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

The agency had 818 pending complaints at the end of this quarter and received 228 new complaints during this quarter. While the investigatory time and resources needed to resolve a complaint vary according to the nature and type of complaint received, the agency believes it will continue to exceed this target assuming it is able to maintain full or near-full staffing level of investigative and legal staff. Additionally, the agency is receiving more complaints than anticipated, which should lead to more resolved complaints, given that the agency was able to hire two new staff attorneys at the beginning of FY26 to help with resolution of the substantive complaints.

* Varies by 5% or more from target.

Agency code: 510

Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
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Output Measures

1 COMPLAINTS RESOLVED

Quarter 2	500.00	140.00	298.00	59.60 % *	225.00 - 275.00
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Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY25 target for number of complaints resolved is 610, or 152 per quarter. During the second quarter of FY 25, the agency exceeded its target by resolving 193 complaints.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

The agency had 633 pending complaints at the end of this quarter and received 157 complaints during the first quarter. While the investigatory time and resources needed to resolve a complaint vary according to the nature and type of complaint received, the agency believes it can closely approach this target assuming it is able to maintain full or near-full staffing level of investigative staff. However, roughly 80% of the existing pending complaints have been investigated and referred to the legal division, which is understaffed. Therefore, the agency has requested additional staff attorneys in its 26-27 LAR to address this.

2 COMPLAINTS PENDING

Quarter 1	850.00	818.00	818.00	96.24 %	807.50 - 892.50
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* Varies by 5% or more from target.

Efficiency/Output Measures with Cover Page and Update Explanation
 89th Regular Session, Performance Reporting
 Automated Budget and Evaluation System of Texas (ABEST)

3/27/2026 8:03:34AM

Agency code: 510

Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
Output Measures					
2 COMPLAINTS PENDING					
Quarter 2	850.00	945.00	945.00	111.18 % *	807.50 - 892.50

Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY25 target for number of complaints pending is 500. During the second quarter of FY 25, the agency had 633 complaints pending. Of this amount, approximately 80% of these are substantive complaints that have been sent to the legal division after the investigation has been completed.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

The agency needs additional staff attorneys to process the substantive complaints that are referred to the legal division in a shorter timeframe. The agency believes that the average complaints pending will continue to exceed the target of 500 for the remainder of the biennium, even assuming the Council is able to maintain full or close-to-full staffing levels. The agency has requested additional staff attorneys in its 26-27 LAR to address this.

Efficiency Measures

1-1-1 LICENSING

1 AVG TIME TO PROCESS APP (DAYS)

* Varies by 5% or more from target.

Agency code: 510

Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
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Efficiency Measures

1 AVG TIME TO PROCESS APP (DAYS)

Quarter 1	35.00	25.53	25.53	72.94 % *	33.25 - 36.75
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Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY26 target for the average time for license issuance is 35 days. In the first quarter of FY26, the agency bested this measure by having an average license issuance time of only 26 days. This is due to the efficiency and dedication of the licensing staff.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

The average time for license issuance in FY25 was 30 days. This number has decreased in the first quarter of FY26 due to the dedication and efficiency of the licensing staff. As long as the Council is able to maintain full or close-to-full staffing levels in this division, the agency will continue to meet or beat this target during the 2026-2027 biennium.

Quarter 2	35.00	28.61	27.07	77.34 % *	33.25 - 36.75
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Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY25 target for the average time for license issuance is 55 days. In the second quarter of FY 25, the agency bested this measure by having an average license issuance time of only 32 days.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

The average time for license issuance for FY 24 was 30 days. This number has remained an average of 30-31 days, due to the dedication and efficiency of the licensing staff. The agency believes that this target will continue to be met or beat during the biennium assuming the Council is able to maintain full or close-to-full staffing levels. Additionally, the agency requested that this target be lowered to 35 days in its 2026-2027 LAR.

2-1-1 ENFORCEMENT

* Varies by 5% or more from target.

Efficiency/Output Measures with Cover Page and Update Explanation
 89th Regular Session, Performance Reporting
 Automated Budget and Evaluation System of Texas (ABEST)

3/27/2026 8:03:34AM

Agency code: 510 Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
Efficiency Measures					
1 AVG TIME/COMPLAINT RESOLUTION					
Quarter 1	375.00	309.30	309.30	82.48 % *	356.25 - 393.75

Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY26 target for the average time for complaint resolution is 375 days. In the first quarter of FY26, the agency bested this measure by having an average processing resolution time of 310 days. This is due to the efficiency and dedication of the investigative and legal staff.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

In FY25, even with the dedication and efficiency of the enforcement and legal staff, the agency needed additional staff attorneys to process the substantive complaints that were referred to the legal division in a shorter timeframe. The agency has been able to hire two new staff attorneys at the beginning of FY26 and believes that as long as the Council is able to maintain full or close-to-full staffing levels in this division, the agency will continue to meet or beat this target during the 2026-2027 biennium.

* Varies by 5% or more from target.

Agency code: 510

Agency name: Behavioral Health Executive Council

Type/Strategy/Measure	2026 Target	2026 Actual	2026 YTD	Percent of Annual Target	Target Range
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Efficiency Measures

1 AVG TIME/COMPLAINT RESOLUTION

Quarter 2	375.00	351.54	329.17	87.78 % *	356.25 - 393.75
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Explanation of Variance: FACTORS CAUSING THE VARIANCE:

The FY25 target for the average time for complaint resolution is 625 days. In the second quarter of FY 25, the agency bested this measure by having an average processing resolution time of 288 days.

HOW THE AGENCY PLANS TO DEAL WITH THE VARIANCE:

The average time for complaint resolution for FY 24 was 312 days. This number has now slightly decreased to an average of 294 days. Even with the dedication and efficiency of the enforcement and legal staff, the agency needs additional staff attorneys to process the substantive complaints that are referred to the legal division in a shorter timeframe. The agency believes that while this target on average will continue to be met or beat during the biennium, the quarterly average may begin to increase, even assuming the Council is able to maintain full or close-to-full staffing levels. The agency has requested additional staff attorneys in its 26-27 LAR to address this. Additionally, the agency has requested that this target be lowered to 375 days in its 2026-2027 LAR.

* Varies by 5% or more from target.

TEXAS BEHAVIORAL HEALTH EXECUTIVE COUNCIL
2nd QUARTER MEASURES
FY 2026

Number of Licenses Renewed (from ald12)

LSSP	456
LIC	697
LPA	76
LPC	3482
MFT	461
LBSW	358
LMSW	1390
LCSW	1808
AP	10

Total 8,738

Number of Licenses Issued (from ald11 and BO)

LPA	16
PLP	109
LIC	72
LSSP	14
LPCA	786
LPC	160
LPC Upgrade	649
MFTA	75
MFT	38
MFT Upgrade	54
LBSW	34
LMSW	470
LCSW	173
LMSW Upgrade	25
LCSW Upgrade	389
TEMP SW	17

Total 3,071

Number of Complaints Resolved (from BO report)

LP/LPA	19
LSSP	2
LPC	96
MFT	7
SW	16
Total	140

Percent of Complaint Resolved Within Six Months (from BO report)

1 st Qtr	83/158 =	53%
2 nd Qtr	47/140 =	34%
3 rd Qtr		
4 th Qtr		
YTD	130/298=	44%

Percent of Complaints Resolved resulting in Disciplinary Action (from BO report)

1 st Qtr	19/158 =	12%
2 nd Qtr	28/140 =	20%
3 rd Qtr		
4 th Qtr		
YTD	47/298 =	16%

Average Time for Complaint Resolution (from BO report)

1 st Qtr	48,875 days to resolve 158 complaints = 309.34 days
2 nd Qtr	49,215 days to resolve 140 complaints = 351.54 days
3 rd Qtr	
4 th Qtr	
YTD	98,090 days to resolve 298 complaints = 329.17 days

Number of Complaints Pending (from BO report)

945

Closed	4
File at SOAH	0
ISC Scheduled	17
Legal Review	538
NOV Sent	4
Open	2
Under Investigation	380

Average Time for Application Processing (from BO report) (**Bold averages only**)

1 st Qtr	76,193 days to process 2,985 applications =	25.53 days
2 nd Qtr	84,885 days to process 2,967 applications =	28.61 days
3 rd Qtr		
4 th Qtr		
YTD	161,078 days to process 5,952 applications =	27.07 days
LPA Initial	1632 days to process 32 applications =	51.00
LPA Final	2792 days to process 16 applications =	174.50
LIC Initial	4750 days to process 119 applications =	39.92
LIC Final	10036 days to process 72 applications =	139.39
LSSP	544 days to process 14 applications =	38.86
Temp LIC	89 days to process 7 applications =	12.72
LPC Initial	11689 days to process 160 applications =	73.06
LPCA Initial	23443 days to process 786 applications =	29.83
LPC Upgrade	7513 days to process 649 applications =	11.58
MFT License	4744 days to process 38 applications =	124.85
MFTA License	12063 days to process 75 applications =	160.84
MFTA Upgrade	903 days to process 54 applications =	16.73
Temp MFT	254 days to process 10 applications =	25.40
SW License	8601 days to process 434 applications =	19.82
SW OOS License	12782 days to process 243 applications =	52.60
SW Upgrade	7848 days to process 414 applications =	18.96
Temp SW License	93 days to process 7 applications =	13.29

- Those in **BOLD** are the applications we have more control over (i.e. we are not waiting for them to take and pass a national exam).

Calculations reviewed by:

David Zinn

Date:

3/25/26

FY26 Q2 Dismissal Report for Psychology Board

Complaints Dismissed	Classification	Reason for Dismissal
2025-00332	Unauthorized Activity	Corrective Action Taken
2024-00441	Unlicensed Person	Corrective Action Taken
2025-00166	Impaired Practice	Insufficient Evidence
2024-00206	Standard of Care	Insufficient Evidence
2025-00187	Standard of Care	Insufficient Evidence
2025-00450	Standard of Care	Insufficient Evidence
2025-00445	Standard of Care	Insufficient Evidence
2025-00546	Failure to Report	Insufficient Evidence
2025-00544	Standard of Care	Insufficient Evidence
2024-00324	Confidentiality	Insufficient Evidence
2025-00539	Standard of Care	Insufficient Evidence
2025-00554	Standard of Care	Insufficient Evidence
2025-00011	Unlicensed Person	Lack of Jurisdiction
2025-00495	Standard of Care	Lack of Jurisdiction
2026-00007	Unprofessional Conduct	Lack of Jurisdiction
2026-00005	Unprofessional Conduct	Lack of Jurisdiction
2025-00628	Unlicensed Person	Lack of Jurisdiction
2025-00453	Impaired Practice	Remedial Plan

DRAFT SCOPE OF WORK
Testing and Psychometric Services for Licensure Examination Development
Texas Behavioral Health Executive Council (BHEC)

1. Background

The Texas Behavioral Health Executive Council (BHEC) is seeking a qualified vendor to support the development of a new licensure examination for psychologists. The examination will assess minimum competence for safe and effective practice and will support supervised and independent practice thresholds. The Council anticipates a multi-vendor or hybrid model for program delivery.

2. Purpose

To identify a vendor to provide test development, psychometric, and advisory services to support the design, validation, and implementation of the licensure examination. BHEC anticipates development of multiple examination forms to support initial launch and ongoing administration, as well as the potential development of practice examination and preparatory examination materials. Vendors should account for these elements in their proposed approach and pricing. All work and justification for proposed solutions should be in alignment with the Standards for Educational and Psychological Testing.

In addition to the traditional psychometric and examination development services outlined in this RFP, BHEC may also seek support for program infrastructure, operational coordination, and strategic advisory services. This may include project management of initial test development, coordination of subject matter experts and development activities, support for candidate registration and eligibility workflows, vendor coordination, and advisory support related to program design, policies, and long-term sustainability. Vendors may propose these services directly or in partnership with other firms.

3. Scope of Work

3.1 Core Responsibilities

- Conduct or validate Job/Practice Analysis (JTA)
- Develop examination blueprint
- Provide item development training and support
- Conduct psychometric analysis and reporting
- Support test form development and assembly
- Conduct standard setting
- Design and support pilot (beta) testing
- Provide technical documentation and ongoing evaluation
- Provide or integrate with secure item authoring and banking systems

3.2 Job/Practice Analysis (JTA)

- Use qualified SME panels and survey-based validation methods
- Ensure appropriate representation across practice settings, experience levels, and geographic regions (including the United States and Canada, as applicable)
- Produce a defensible technical report documenting methodology and results
- Translate findings into an examination blueprint with documented weighting rationale

- Ensure the JTA and resulting blueprint are designed and reflect the practical application of psychological knowledge in common practice settings.

3.3 Exam Design Requirements

- Approximately 50% situational judgment items (SJIs)
- Consideration of alternative item types (e.g. hot spot, drag and drop etc.)
- Support up to 4.5 hours of seat time, minimizing speediness
- Support single compensatory or modular/multiple-hurdle models
- Provide recommendations on optimal structure

3.4 Standard Setting

- Use Modified Angoff or justified alternative
- Train and facilitate SME panels
- Establish two cut scores (supervised and independent practice)
- Support a single exam with dual pass points
- Provide technical documentation and rationale

3.5 Psychometric Analysis

- Conduct Classical Test Theory (CTT) analyses
- Conduct Item Response Theory (IRT) modeling, as appropriate
- Perform Differential Item Functioning (DIF) analysis
- Provide recommendations for item retention, revision, or removal
- Document analyses for technical and regulatory review

3.6 Fairness, Bias Review, and Mitigation

- Conduct item bias and sensitivity review processes
- Integrate fairness principles into item development
- Perform routine DIF analysis
- Propose and justify additional approaches (bias review teams, implicit bias training, latent regression)

3.7 Test Development Activities

- Item writing training and workshops
- Item review and approval meetings
- Copy editing and content review
- Item bank gap analysis
- Item classification and recoding

- Fixed form assembly and/or multi-form development
- Test form review meetings
- Form-based item analysis
- Equating and scaling methodologies

3.8 Pilot and Beta Testing

The State of Texas prefers to do additional pilot testing given that the exam is new.

Vendors are asked to provide separate pricing for additional piloting beyond beta testing:

- Include form and administration for independent review
- Include administration for pilot (pre-beta) testing to include:
 - candidates within and outside the profession
 - Include known groups (e.g. interns, new licensees, senior practitioners, non psychologists)
- Include administration for Beta testing
- Analyze item performance, form performance, and timing data
- Provide recommendations for operational readiness and scoring

3.9 Test Administration and Delivery

- Support access to a test center network
- Support remote proctored delivery
- Support scheduling and authorization workflows
- Support score transmission
- Provide guidance on security and test integrity

3.10 Candidate Registration and Eligibility Systems

- Provide candidate registration solution.
- Enable CSV/API data exchange
- Support eligibility uploads and score return
- Support reconciliation processes

3.11 Item Authoring and Banking Systems

- Provide secure item authoring tools with role-based access
- Support workflows across multiple SME groups
- Maintain version control and audit trails
- Provide secure item banking with classification and tracking
- Support integration with psychometric data

3.12 Technical Documentation

- Practice analysis report
- Standard setting report
- Technical manual
- Ongoing psychometric reports

3.13 Security and Compliance

- Ensure item bank and data security
- Provide fraud detection and test security measures
- Ensure compliance with data privacy requirements

3.14 Collaboration Requirement

- Work with program management partners or Council staff
- Support coordinated workflows across vendors
- Communicate with technical and non-technical stakeholders

4. Validation and Research

4.1 Core Validation (Required)

- Ensure content validity through JTA and blueprint alignment
- Provide psychometric analyses supporting score interpretation
- Implement fairness and bias review processes
- Document validation evidence

4.2 Enhanced Validation (Desired)

Consideration should be given to additional strategies as supplemental evidence of validation. Vendors should provide options based on their experience and expertise. Some suggested methodologies include:

- Known groups validation (graduate students, interns, early career, mid-year, Board Certified, non psychology majors)
- Concurrent validity (e.g., supervisor ratings)
- Discriminant validity (e.g., GRE comparison)
- Convergent validity aligned with APA frameworks
- Measurement and structural invariance analyses, where feasible based on available sample size and subgroup representation
- Longitudinal validation (e.g. comparison with disciplinary data)

4.3 Data Infrastructure

- Data collection methods
- Integration with systems
- Data governance and security
- Long-term research capability

STAKEHOLDER PERCEPTIONS OF PSYCHOLOGY LICENSURE EXAMINATION

Survey Report Results

Texas Behavioral Health Executive Council

January 2026

EXECUTIVE SUMMARY

Primary Finding

Based on survey responses from 847 stakeholders in the psychology profession, meaningful support exists for developing an alternative licensure examination pathway, though this support is neither universal nor unconditional. Among respondents expressing a definitive opinion (excluding those who were unsure), 59% support development of an alternative exam, while 41% oppose or express uncertainty. This finding, combined with documented concerns about the current Examination for Professional Practice in Psychology (EPPP), suggests that exploration of an alternative pathway is warranted, subject to specific conditions and safeguards identified by stakeholders.

Key Survey Findings

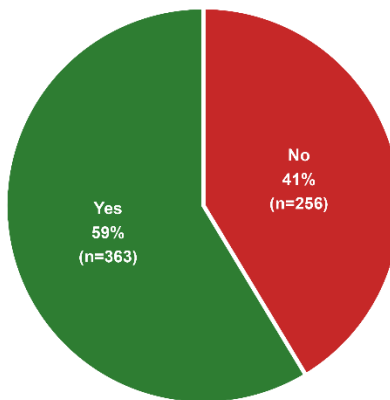
Current Examination Perceptions

Respondent satisfaction with the current EPPP is moderate and varied. Ratings are distributed relatively evenly across the scale, with 41% reporting dissatisfaction, 16% neutral, and 42% satisfied. This distribution indicates mixed experiences rather than uniform approval or rejection. When asked to rate specific components of the current examination, respondents identified professional impact and financial cost as the aspects most in need of improvement. Approximately 46% of respondents indicated that these components require much improvement, significantly higher than other aspects such as registration processes or exam length.

Support for Alternative Examination

The following figure shows how support, opposition, and uncertainty are distributed among respondents.

Support Among Those with Definitive Opinion: 59% Support
Excludes 200 'Unsure' respondents (24% of total)



Among those expressing either support or opposition (excluding the unsure responses), 59% support the alternative while 41% oppose it. Support for an alternative examination is strongly associated with current exam dissatisfaction. Respondents who support the alternative report substantially lower satisfaction with the current EPPP compared to those who oppose an alternative, representing a difference of more than two full points on the five-point scale.

Content and Design Priorities

Stakeholders expressed clear preferences for examination content and format, with the strongest support for applied clinical competencies and real-world practice scenarios, ethics and professional conduct assessment, case-based and situational judgment formats over traditional multiple-choice questions, and cultural competency and equity considerations. These preferences reflect concerns that current licensure assessment may emphasize theoretical knowledge over practical competence, creating potential misalignment between examination content and actual practice requirements.

Accessibility and Delivery Considerations

Financial burden and accessibility emerged consistently as major concerns. Cost received the lowest adequacy ratings among assessed components, with 46% of respondents indicating this area requires much improvement. Geographic accessibility and flexible delivery options were identified as important design requirements, with strong interest expressed in remote proctoring capabilities and multiple testing dates.

Legislative Context

The Texas Legislature has directed the Texas Behavioral Health Executive Council to explore the feasibility of developing a new, nationally-available licensure examination for psychology practice. This examination would function as an alternative pathway to licensure alongside the existing EPPP. The survey was designed to assess stakeholder support for an alternative examination, identify perceived benefits and risks, gather input on examination content, structure, and delivery, and understand conditions under which an alternative would be acceptable to stakeholders.

Important Study Limitations

Several methodological considerations affect interpretation of these findings. Of 665 respondents who reported their location, 381 (57%) reside in Texas. While this reflects the survey's primary distribution through Texas channels, it limits the extent to which findings can be generalized to the national psychology community. Claims about support for a nationally-available examination require validation through more geographically balanced sampling. Priorities identified in this survey may reflect Texas-specific concerns.

The survey employed voluntary participation, meaning respondents self-selected into the study. This approach likely over-represents individuals with strong opinions (either positive or negative) about licensure examinations compared to the broader population of psychologists. Response rates cannot be calculated without a defined sampling frame. Analysis of satisfaction by career stage is limited by substantial missing data. Only 182 respondents (21.5% of the sample) provided usable information about years of practice after data wrangling. This missing data creates potential for selection bias, as those providing career information may differ systematically from those who did not. Findings related to career stage should be interpreted with caution. These limitations do not invalidate the survey findings but rather establish appropriate bounds for interpretation and application to policy decisions.

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 7. Conclusion
- Appendix A: Detailed Methodology
- Appendix B: Sample Characteristics

1. LEGISLATIVE AND POLICY CONTEXT

Background and Purpose

The Texas Legislature has directed the Texas Behavioral Health Executive Council to explore the possibility of creating a new, nationally available licensure examination for the practice of psychology. If developed, this examination would serve as an alternative pathway to licensure, functioning alongside the existing Examination for Professional Practice in Psychology (EPPP) rather than as a replacement. This legislative direction responds to longstanding concerns within the psychology profession regarding examination relevance, accessibility, equity, and alignment with contemporary practice demands. Questions about licensure examination effectiveness have emerged across multiple domains: whether current examinations adequately assess competencies required for safe, effective practice; how financial costs and geographic access requirements affect workforce diversity and availability; whether examination content reflects contemporary practice across diverse settings and populations; and how licensure requirements balance public protection with workforce accessibility.

Survey Objectives

The survey was designed to provide evidence-based input for policy deliberations by accomplishing four primary objectives. First, assess stakeholder support by determining the extent and nature of support for developing an alternative licensure examination, including identification of conditions under which stakeholders would find such an alternative acceptable. Second, document current system perceptions by systematically capturing stakeholder experiences with and perceptions of the current EPPP, including identification of strengths and areas requiring improvement. Third, identify design priorities by gathering detailed input on desired characteristics of any alternative examination, including content domains, assessment formats, delivery mechanisms, and governance structures. Fourth, understand risks and benefits by eliciting stakeholder perspectives on potential benefits and risks associated with developing an alternative pathway, including equity implications, implementation challenges, and workforce impacts.

Policy Decision Framework

Survey findings are intended to inform, but not solely determine, the Council's decision regarding whether and how to proceed with alternative examination development. Key decisions requiring consideration include whether documented stakeholder support and identified needs justify investment in alternative examination development; what content domains, competencies, and assessment formats should be prioritized; how to structure governance and stakeholder involvement in development processes; what accessibility features and delivery mechanisms are essential versus desirable; how to ensure psychometric validity, legal defensibility, and interstate acceptance; and whether and how to proceed with implementation given identified risks and resource requirements.

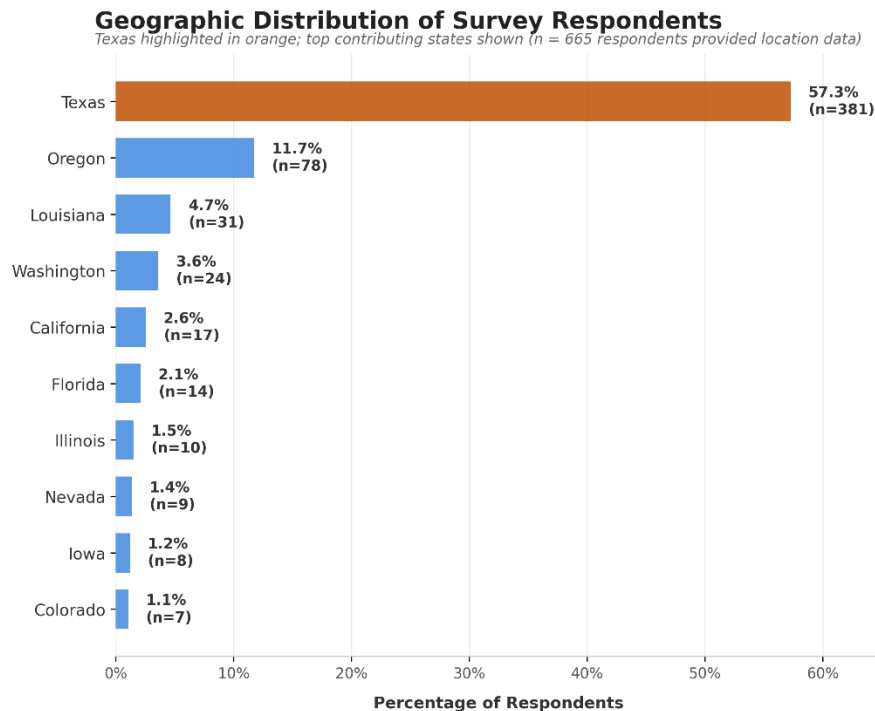
2. SURVEY METHODOLOGY AND DATA OVERVIEW

Survey Design and Administration

The survey employed an online format administered through SurveyMonkey from August 27, 2025 through December 31, 2025. The instrument included 31 questions combining quantitative items (Likert-scale ratings, ranking tasks, multiple-choice selections) and qualitative items (open-ended responses). All questions were optional to maximize participation while allowing respondents to skip items they preferred not to answer. Distribution occurred primarily through Texas professional psychology channels, though respondents were encouraged to share the survey with colleagues nationally. The voluntary participation approach prioritized accessibility and breadth of input over statistical representativeness.

Sample Characteristics

A total of 847 individuals responded to the survey. Respondents represented diverse professional roles, practice settings, and geographic locations, though with notable concentration in Texas as described below.

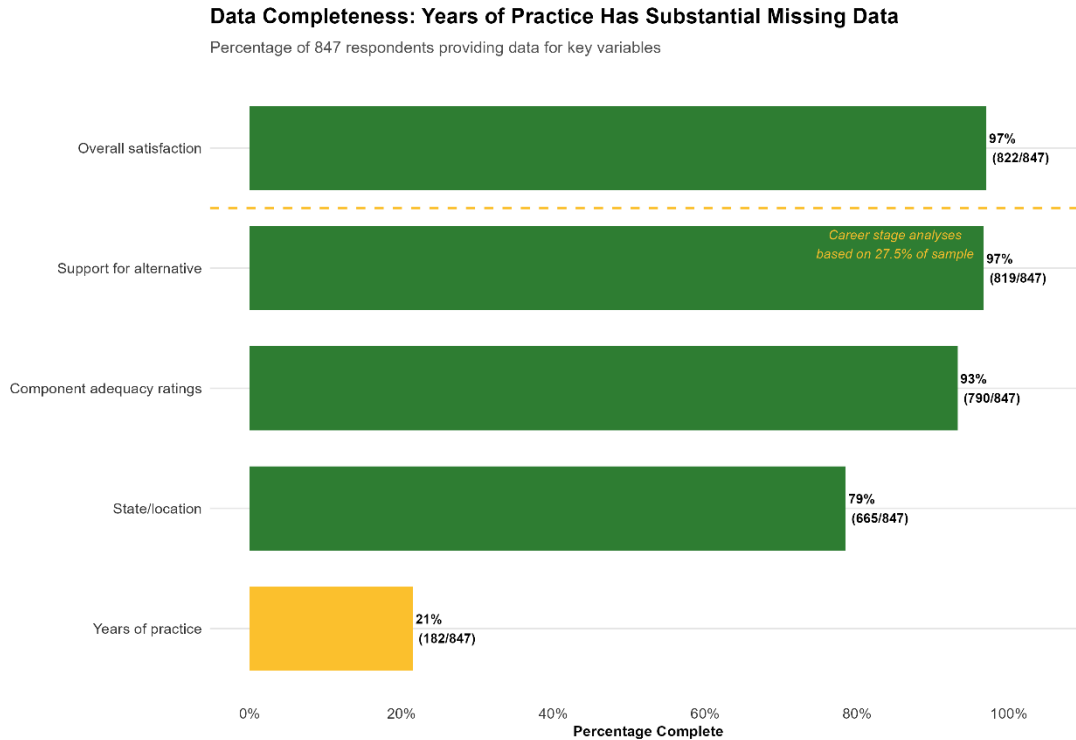


Geographic distribution is illustrated in the following figure, which shows the concentration of respondents by state. 665 respondents (78.5%) reported their state or territory of residence, 381 (57.3%) indicated Texas. Other well-represented states included Oregon (78 respondents, 13%), Louisiana (31 respondents, 5%), Washington (24 respondents, 4%), and California (17 respondents, 3%). This geographic concentration reflects the survey's primary distribution through Texas professional channels and the Texas Legislature's directive to the Council. However, it limits the extent to which findings can be confidently generalized to the national psychology community.

Professional experience data presented some limitations, with only 182 respondents (21.5%) providing usable information about years of practice after data cleaning. Among this subsample, 33% reported 0-5 years of practice,

24% reported 6-10 years, 24% reported 11-20 years, and 19% reported more than 20 years. This high rate of missing data (78.5%) means career stage analyses should be interpreted cautiously, as those providing this information may differ systematically from those who did not.

The extent of missing data for key variables is shown in the following figure.



Respondents work across multiple practice settings. Commonly reported settings included medical and healthcare environments, private practice, academic institutions, community and public sector organizations, and government or forensic contexts. Many respondents indicated working in multiple settings concurrently, reflecting the diverse and often multi-faceted nature of contemporary psychology practice.

Analytical Approach

Quantitative data were analyzed using descriptive statistics, frequency distributions, and measures of central tendency and variability. Rating scale data were analyzed as ordinal variables using appropriate non-parametric or ordinal regression methods. Associations between variables were examined using correlation analyses and group comparisons.

Qualitative data from open-ended questions were analyzed using thematic coding. Text responses were preprocessed, common themes identified through frequency analysis and conceptual grouping, and representative examples selected for illustration.

All analyses acknowledge the survey's methodological limitations, including voluntary response bias, geographic concentration, and substantial missing data for certain variables. Statistical findings are presented with appropriate caution regarding generalizability.

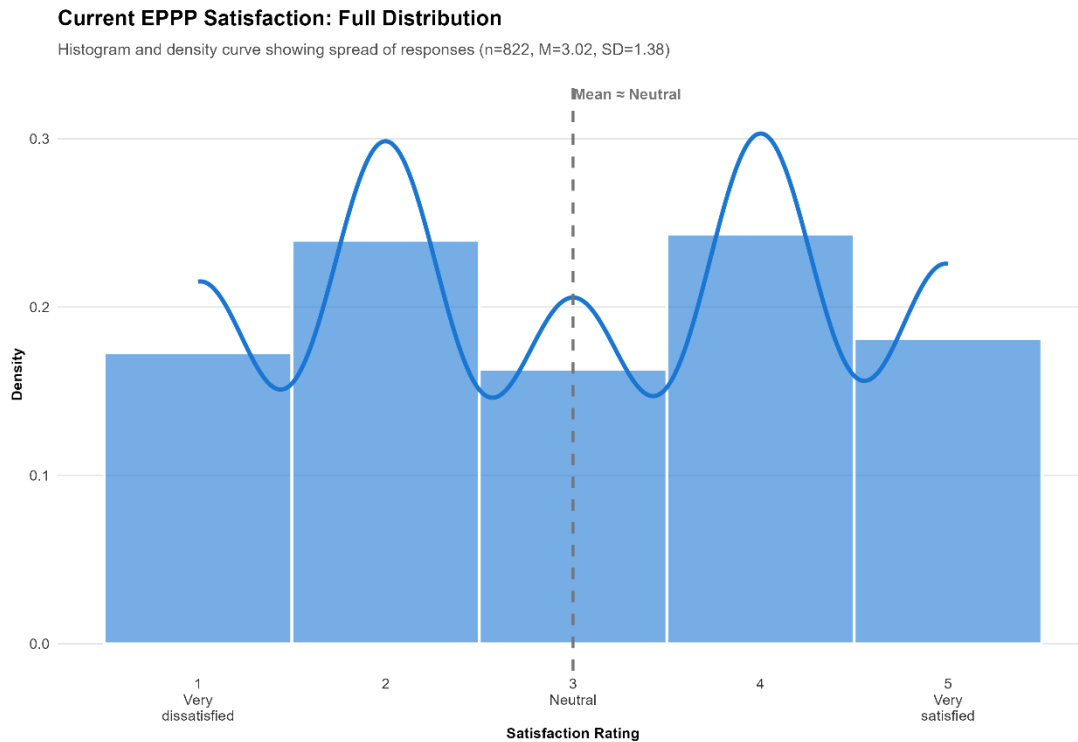
3. KEY SURVEY FINDINGS

This section presents empirical findings from the survey organized by major topic areas. Findings are reported as observed in the data, with interpretation and policy implications reserved for subsequent sections.

3.1 Current EPPP Satisfaction and Adequacy Perceptions

Overall Satisfaction

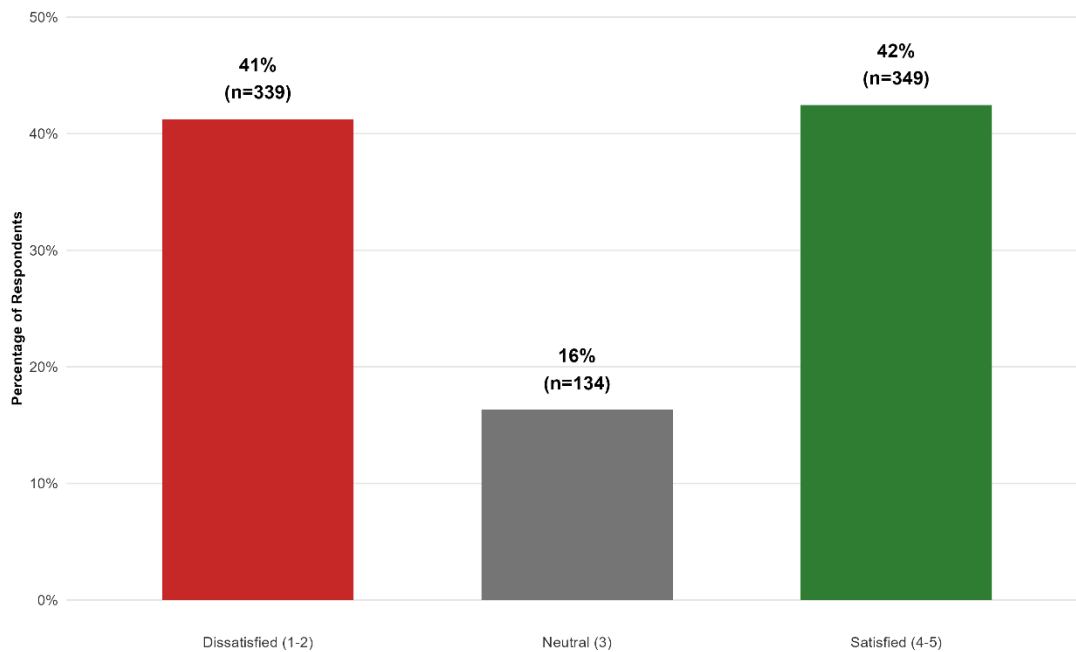
Respondents rated their overall satisfaction with the current EPPP on a 5-point scale where 1 indicates very dissatisfied and 5 indicates very satisfied. The distribution of responses is shown below.



Of 822 respondents who provided a rating, the mean satisfaction was 3.02 with a standard deviation of 1.38 and a median of 3.0. The distribution shows 17% rated 1 (very dissatisfied), 24% rated 2, 16% rated 3 (neutral), 24% rated 4, and 18% rated 5 (very satisfied). The mean of 3.02 falls essentially at the neutral midpoint of the 5-point scale, with responses distributed relatively evenly across dissatisfaction (41% rated 1-2), neutral (16%), and satisfaction (42% rated 4-5). This pattern indicates varied rather than uniformly positive or negative experiences with the current examination. An alternative view grouping ratings into broader categories reinforces this pattern.

Current EPPP Satisfaction: Roughly Equal Split

Grouped satisfaction ratings illustrate mixed rather than uniform views (n=822)

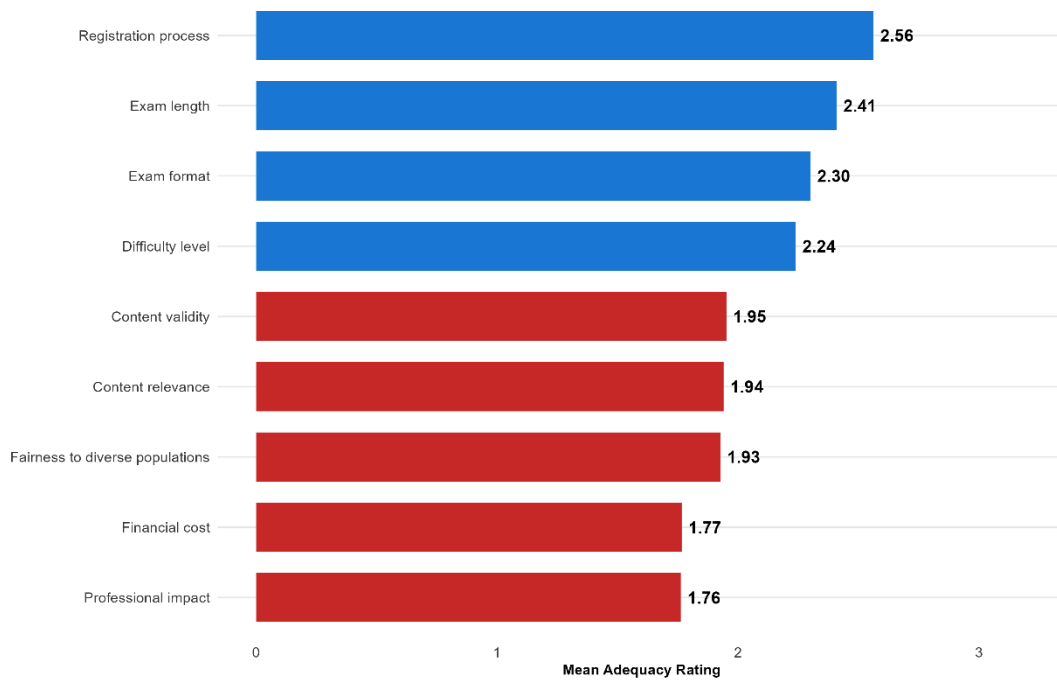


This bar chart shows that stakeholder views are split roughly evenly between those dissatisfied and those satisfied, with a smaller neutral group in between. The absence of a strong consensus in either direction is itself an important finding for policy consideration.

Component Adequacy Ratings

Respondents evaluated specific aspects of the current EPPP using a 3-point scale where 1 indicates much improvement needed, 2 indicates some improvement needed, and 3 indicates no improvement needed. The following figure shows mean adequacy ratings for each component.

Current EPPP Component Adequacy: Cost and Impact Rated Lowest



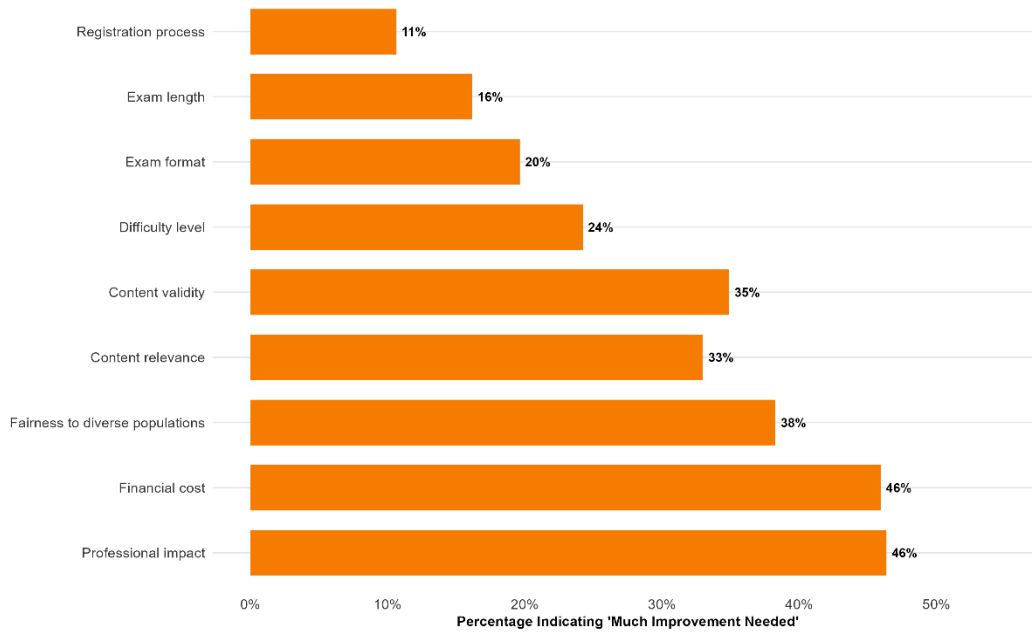
The components receiving the lowest adequacy ratings, indicating areas of greatest concern, were professional impact (mean of 1.76, with 46% indicating much improvement needed), financial cost (mean of 1.77, with 46% indicating much improvement needed), fairness to diverse populations (mean of 1.93, with 38% indicating much improvement needed), content relevance (mean of 1.94, with 33% indicating much improvement needed), and content validity (mean of 1.95, with 35% indicating much improvement needed).

In contrast, logistical aspects received higher adequacy ratings. Registration processes received a mean of 2.56 with only 11% indicating much improvement needed. Exam length received a mean of 2.41 with 16% indicating much improvement needed. Exam format received a mean of 2.30 with 20% indicating much improvement needed.

The severity of concerns can also be viewed by examining the percentage of respondents who selected the most critical rating.

Severity of Concerns: Percentage Rating 'Much Improvement Needed'

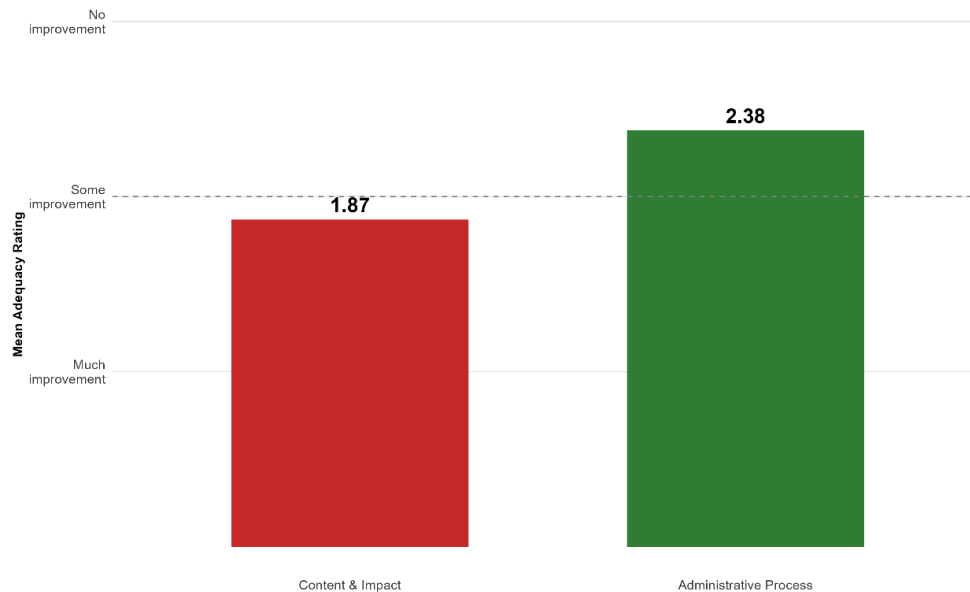
Financial cost and professional impact emerge as most problematic areas



These patterns suggest stakeholder concerns focus primarily on examination content and impact (professional relevance, cost, fairness, validity) rather than administrative procedures. The figure below groups components to illustrate this distinction.

Concerns Focus on Content, Not Administrative Process

Average adequacy ratings grouped by component type

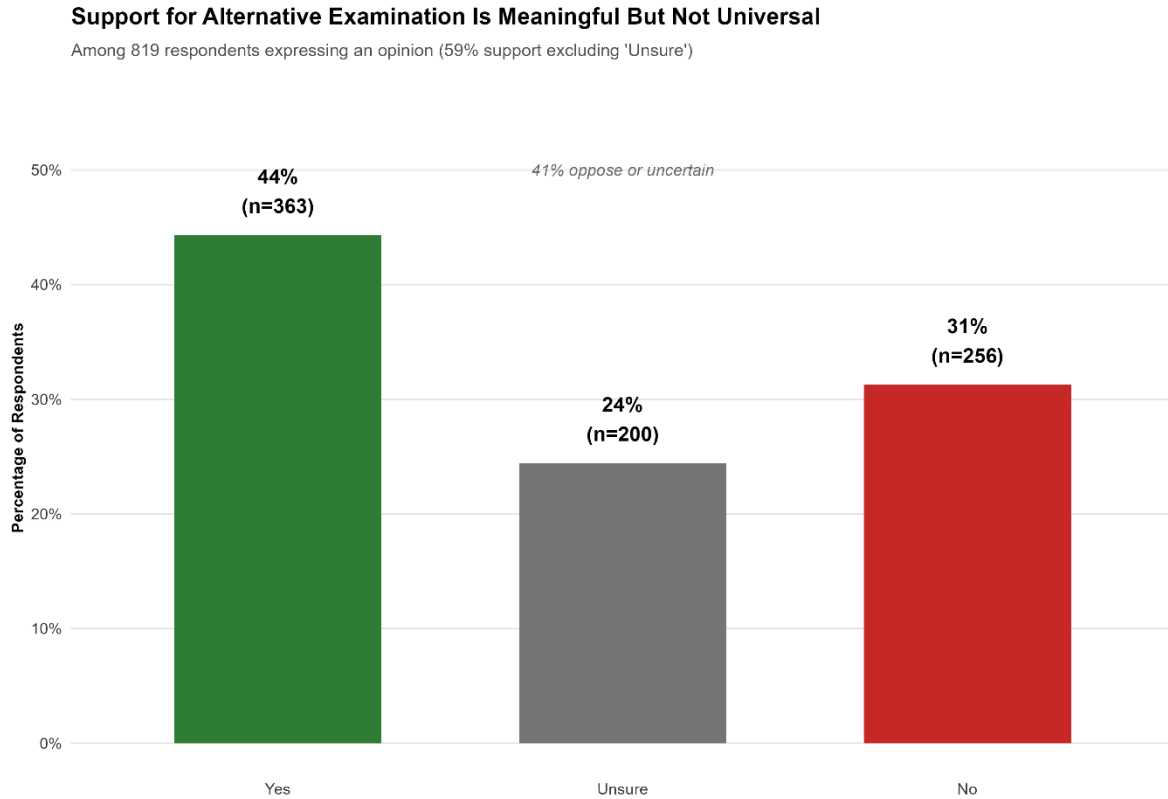


This grouping reveals that content and impact concerns consistently score lower than administrative process concerns, indicating that logistical improvements alone would be insufficient to address stakeholder concerns.

3.2 Support for Alternative Examination Development

Level of Support

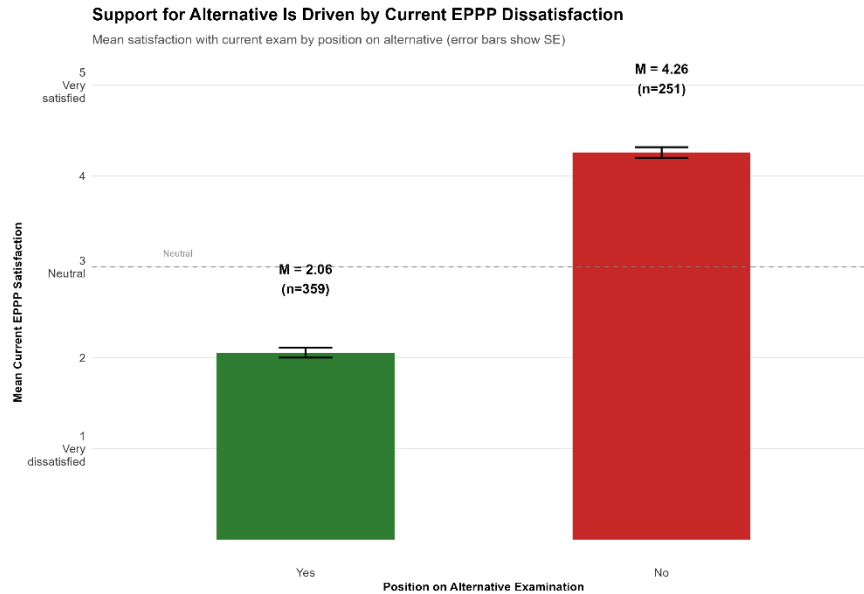
When asked whether they would support development of an alternative licensure examination, 819 respondents provided an opinion. The distribution of responses is shown in the following figure.



Support for development was indicated by 363 respondents (44.3% of all who answered). Opposition to development was indicated by 256 respondents (31.3% of all who answered). Uncertainty was indicated by 200 respondents (24.4% of all who answered).

Relationship to Current Exam Satisfaction

Support for an alternative examination is strongly associated with dissatisfaction with the current EPPP. The following figure compares mean satisfaction levels between those who support and those who oppose an alternative.



Respondents supporting an alternative reported a mean satisfaction of 2.06 (standard deviation of 1.03), while respondents opposing an alternative reported a mean satisfaction of 4.26 (standard deviation of 0.93). Respondents who were unsure reported a mean satisfaction of 3.15 (standard deviation of 1.06). The 2.20-point difference between supporters and opponents is substantial, representing more than two-fifths of the scale's range and approximately 1.6 standard deviations.

This pattern suggests that support for an alternative pathway is primarily driven by concerns about the current system rather than broad philosophical opposition to standardized licensure examinations. Support appears conditional on the alternative addressing identified deficiencies rather than representing inherent enthusiasm for change itself.

3.3 Content and Design Preferences

Priority Content Domains

When asked to identify high-priority content areas for any licensure examination, respondents emphasized applied and practice-oriented competencies. Applied clinical skills and treatment planning were identified as high priority by a substantial majority. Ethics and professional conduct showed strong consensus on importance. Assessment and diagnosis in practice contexts were rated as high priority. Cultural competency and work with diverse populations were consistently emphasized. In contrast, traditional foundational knowledge areas received lower prioritization. Research methodology and statistics, while recognized as important for scientific psychology, were less frequently identified as essential for licensure examination content compared to applied competencies.

Assessment Format Preferences

Respondents expressed strong preferences for assessment formats emphasizing practical application over rote knowledge. Scenario-based questions requiring application of knowledge to realistic practice situations received substantial support. Case analysis requiring integration of information and clinical reasoning was preferred. Situational judgment items assessing decision-making in context were emphasized. Traditional multiple-choice formats testing isolated knowledge received substantially less enthusiasm, though some respondents noted the practical advantages of multiple-choice items for standardization and scoring reliability.

3.4 Delivery and Accessibility Features

Examination Length

When asked about appropriate examination length, respondents most frequently indicated preference for examinations in the 4-8 hour range. This represents a moderate length that balances comprehensive assessment with practical constraints on examinees.

Remote Proctoring

Remote proctoring options received strong support as an accessibility feature. The majority of respondents indicated that remote proctoring capability would be important or very important, suggesting geographic access barriers are a significant concern for the profession.

Multiple Testing Dates

Availability of multiple testing dates and flexible scheduling options were also identified as important accessibility features, allowing examinees to choose timing that accommodates their training schedules and personal circumstances.

3.5 Governance and Stakeholder Involvement Preferences

Respondents provided input on which stakeholder groups should be involved in alternative examination development and governance. Priorities emerged for inclusive representation.

Early career practitioners were identified as important to include given their recent training and contemporary practice perspectives. Community-based and diverse practice settings were emphasized to ensure examination relevance across practice contexts. Academic and training programs were recognized for expertise in competency assessment and training standards. Licensing boards and regulatory bodies were considered important for ensuring legal and regulatory requirements are met. Public and consumer representatives were valued for maintaining focus on public protection.

These preferences indicate desire for multi-stakeholder governance that balances institutional authority with frontline practitioner input and public accountability.

4. INTERPRETATION AND IMPLICATIONS FOR LICENSURE POLICY

This section interprets survey findings in the context of licensure policy decisions, identifying patterns, relationships, and implications while acknowledging data limitations.

4.1 Support for Reform Is Meaningful But Conditional

Survey results demonstrate that support for developing an alternative licensure examination exists at meaningful levels. Among respondents expressing either support or opposition, 59% favor the alternative. This level of support is sufficient to warrant serious consideration of proceeding with development. However, several factors require acknowledgment.

First, support is not overwhelming or universal. With 41% opposing or uncertain, substantial portions of the stakeholder community have reservations. This opposition cannot be dismissed as merely resistant to change, as opponents express higher satisfaction with the current system than supporters do.

Second, support is strongly tied to dissatisfaction with the current EPPP rather than enthusiasm for alternatives in principle. The 2.20-point satisfaction gap between supporters and opponents suggests that support primarily reflects desire to address current system deficiencies rather than philosophical commitment to a particular alternative model. This means that support is conditional. If an alternative fails to address identified concerns (particularly cost and professional relevance), stakeholder support may not materialize in practice.

Third, the survey's geographic concentration in Texas (57% of respondents with location data) requires caution in characterizing these findings as representing national support. While responses from other states generally align with Texas patterns, the sample's composition means Texas-specific priorities may be over-weighted. Claiming broad national support for a nationally available examination would require validation through more geographically diverse sampling.

4.2 Current System Deficiencies Focus on Content, Not Process

The pattern of component adequacy ratings reveals important information about the nature of stakeholder concerns. Components receiving the lowest ratings (professional impact, cost, fairness, content validity, and relevance) all relate to examination content and consequences rather than administrative processes.

Administrative aspects such as registration procedures, exam length, and format received substantially higher adequacy ratings. This suggests that logistical improvements alone (such as making the current examination easier to schedule or shorter) would be insufficient to address stakeholder concerns. Fundamental questions about what the examination measures, how it relates to practice, who can afford it, and whether it fairly assesses diverse candidates appear to be the core issues.

This has direct implications for alternative examination design. Success requires addressing content validity, practice relevance, cost barriers, and equity concerns, not merely replicating the current examination with improved logistics.

4.3 Stakeholders Prioritize Applied Over Theoretical Assessment

The clear preference for applied clinical competencies, scenario-based assessment, and case analysis over traditional knowledge testing reflects a broader concern about examination validity. Stakeholders appear to question whether examinations testing theoretical knowledge accurately predict competent practice.

This emphasis on applied assessment aligns with contemporary competency-based approaches to professional education and licensure. However, it also presents psychometric and practical challenges. Scenario-based and case analysis formats are typically more expensive to develop, more time-consuming to administer, and more complex to score reliably than traditional multiple-choice tests. Any alternative examination prioritizing these formats must address these implementation challenges.

The stakeholder perspective may also reflect generational differences in training. Psychology education has increasingly emphasized evidence-based practice, competency-based assessment, and applied training. Recent graduates may expect licensure examinations to reflect these contemporary approaches, while finding traditional examinations misaligned with their training experiences.

4.4 Financial Barriers Have Equity Implications

Financial cost emerged as one of the two lowest-rated components (tied with professional impact), with 46% of respondents indicating this area requires much improvement. This finding should be interpreted in context of broader workforce and equity concerns.

Examination costs represent barriers at a particularly vulnerable point in professional development. Candidates face these costs after completing expensive doctoral training but before beginning full professional earning capacity. For candidates from economically disadvantaged backgrounds, examination costs may represent prohibitive barriers rather than manageable investments.

Geographic access barriers compound financial concerns. Candidates in rural areas or regions without testing centers may incur travel and lodging costs in addition to examination fees. Remote proctoring options, while presenting their own challenges, could substantially reduce these geographic access barriers.

These financial and access barriers have direct implications for workforce diversity and availability. If licensure requirements disproportionately burden candidates from disadvantaged backgrounds or rural regions, they may contribute to ongoing workforce shortages and limit diversity in the profession. Any alternative examination should carefully consider fee structures, financial assistance options, and delivery mechanisms that reduce rather than perpetuate these barriers.

4.5 Governance Legitimacy Requires Inclusive Representation

Stakeholder preferences regarding governance and involvement reveal concerns about who makes decisions about licensure requirements. The emphasis on including early-career practitioners and community-based perspectives alongside traditional institutional stakeholders suggests that legitimacy requires visible inclusion of frontline practitioner voices.

This preference may reflect broader concerns about power dynamics in professional regulation. If an alternative examination is perceived as being designed primarily by and for academic institutions or regulatory bodies without meaningful input from practicing psychologists, it may face resistance regardless of its technical quality.

However, inclusive governance presents practical challenges: balancing diverse stakeholder perspectives, managing potential conflicts of interest, ensuring technical expertise while incorporating practitioner wisdom, and making timely decisions with broad-based input. Any governance structure must address these competing demands.

5. RECOMMENDATIONS

Based on verified survey findings and acknowledging documented limitations, the following recommendations are offered to guide the Texas Behavioral Health Executive Council's deliberations. Each recommendation is explicitly grounded in survey data and proportionate to the strength of evidence.

5.1 Primary Recommendation: Conditional Proceed with Alternative Development

The Council should proceed with exploration and potential development of an alternative licensure examination, subject to specific conditions and safeguards outlined below.

Survey data provides sufficient evidence to warrant proceeding. Meaningful support exists (59% among those with definitive opinions). Documented deficiencies in the current system (cost, professional relevance, fairness) create justification for exploring alternatives. Clear stakeholder priorities for alternative design have been identified. The alternative would expand options rather than eliminate the existing pathway.

However, proceeding should be explicitly conditional on addressing stakeholder concerns and acknowledging that support is neither overwhelming nor unconditional.

5.2 Essential Conditions for Development

If the Council decides to proceed, development must address the following essential conditions identified through survey findings.

Condition 1: Prioritize Applied Clinical Competencies

Content development must emphasize assessment of practical clinical competencies over theoretical knowledge. Specifically, focus examination content on applied clinical skills, treatment planning, assessment in practice contexts, and professional decision-making. Employ scenario-based assessment formats, case analysis, and situational judgment items that require application of knowledge to realistic practice situations. Ensure content validity through systematic practice analysis demonstrating that assessed competencies are required for safe, effective practice.

Condition 2: Substantially Reduce Financial Barriers

Cost emerged as one of the most problematic aspects of current licensure examinations. Any alternative must establish examination fees substantially lower than current EPPP costs. Consider fee reduction or waiver programs for candidates demonstrating financial need. Implement remote proctoring capabilities to reduce geographic access barriers and associated travel costs. Provide transparent information about all costs (examination fees, preparation materials, retake fees) early in candidates' planning.

Condition 3: Establish Inclusive Multi-Stakeholder Governance

Governance structure must provide meaningful representation across stakeholder groups. Include early-career practitioners with recent training and contemporary practice perspectives. Ensure representation from diverse practice settings (not only academic or institutional contexts). Balance institutional authority (licensing boards, academic programs) with frontline practitioner input. Include public and consumer representatives to maintain focus on public protection. Actively recruit both satisfied and dissatisfied stakeholders to avoid development bias toward particular perspectives.

Condition 4: Ensure Bias Prevention and Fairness

Development must proactively address fairness concerns. Conduct systematic fairness and bias review with diverse panels throughout item development. Ensure examination content reflects contemporary practice with diverse populations. Analyze pilot test data for differential performance patterns by candidate demographics. Provide accommodations for candidates with disabilities consistent with professional practice requirements.

Voluntary participation in development may over-represent dissatisfied stakeholders, potentially biasing the alternative toward particular perspectives.

Mitigation: Actively recruit satisfied stakeholders and those neutral about the current system to participate in development. Ensure governance structure balances diverse viewpoints.

6. LIMITATIONS AND CONSIDERATIONS FOR FUTURE ANALYSIS

This section consolidates methodological limitations affecting interpretation of survey findings and identifies areas requiring additional investigation before final policy decisions.

6.1 Sampling and Representativeness Limitations

Geographic Concentration

The survey's geographic concentration in Texas (57.3% of respondents with location data) substantially limits confidence in characterizing findings as representing national stakeholder perspectives. While the sample includes respondents from multiple states, the distribution does not approximate the national psychology workforce.

Claims about support for a nationally available examination require validation through more geographically balanced sampling. Priorities identified in this survey may reflect Texas-specific concerns. Before proceeding with claims of national support, targeted consultation with stakeholders in additional states is recommended.

Voluntary Response Bias

Voluntary participation likely over-represents individuals with strong opinions (either positive or negative) about licensure examinations. Those satisfied with current arrangements and those extremely dissatisfied may be over-represented relative to moderate voices. Without a defined sampling frame, response rates cannot be calculated, and extent of non-response bias cannot be quantified.

Reported levels of support and opposition may be somewhat inflated relative to the broader population. The survey accurately captures concerns of those motivated to respond but may not fully represent those without strong opinions. Proceed with awareness that silent majority perspectives are unknown.

6.2 Missing Data Limitations

Career Stage Analysis

Only 182 respondents (21.5%) provided usable information about years of practice after data cleaning. This 78.5% missing rate creates substantial uncertainty about career stage findings. Those providing career information may differ systematically from those who did not. For example, early-career practitioners might be more likely to report years if they perceive it as relevant to their concerns.

Findings related to career stage differences should be considered suggestive rather than definitive. The available data indicate that among the 21.5% who provided this information, less experienced practitioners report lower satisfaction. Whether this pattern holds in the broader sample is uncertain. Recommendations emphasizing early career needs rest on a limited evidential foundation.

6.3 Measurement Limitations

Support Measurement

The survey asked about general support for developing an alternative without specifying particular examination characteristics. Respondents may have imagined different alternatives when answering. Measured support may be

contingent on assumptions about what the alternative would include, assumptions that may or may not align with what is ultimately developed.

Support is conditional on the alternative addressing identified concerns. If development produces an examination that does not differ materially from the current EPPP, support may not persist. Conversely, if the alternative is perceived as compromising public protection, opponents may mobilize more vocally.

Priority Measures

Questions about content priorities asked respondents what should be emphasized without requiring tradeoffs. Most items can be rated as important when considered individually. Actual examination development requires difficult choices about how to allocate limited testing time across competing priorities. Survey data help identify what stakeholders value but do not resolve necessary tradeoffs.

6.4 Areas Requiring Additional Investigation

Before final decisions about proceeding with alternative development, several areas require additional investigation beyond this survey's scope.

Technical Feasibility

The survey documents stakeholder preferences for scenario-based, case analysis assessment formats. Technical feasibility (including item development costs, scoring reliability, security concerns, and psychometric validation requirements) requires expert psychometric consultation. Stakeholder preferences must be balanced against technical constraints.

Financial Modeling

Stakeholders clearly desire lower costs than current examination fees. Comprehensive financial modeling is needed to determine whether a high-quality examination can be sustainably maintained at substantially reduced fees. This modeling should account for development costs, ongoing operational expenses, security requirements, and anticipated utilization volumes.

Interstate Acceptance

For a nationally-available examination, acceptance by other state licensing boards is essential. Survey of other states' willingness to recognize a Texas-developed alternative should be conducted before committing substantial resources to development.

Legal and Regulatory Review

Legal requirements for licensure examinations, including validity standards, accommodation requirements, and regulatory compliance, require thorough legal review. This survey documents stakeholder preferences but cannot determine legal sufficiency of proposed approaches.

7. CONCLUSION

This survey of 847 stakeholders in the psychology profession provides evidence-based input for the Texas Behavioral Health Executive Council's consideration of developing an alternative licensure examination. The findings demonstrate that meaningful support exists for exploring an alternative pathway (59% among those expressing support or opposition), while also revealing substantial opposition and uncertainty (41%) that cannot be dismissed.

Support for an alternative appears driven primarily by concerns about the current EPPP rather than philosophical commitment to particular alternative models. Specifically, stakeholders identify financial burden, professional relevance, fairness, and content validity as problematic aspects of current licensure requirements. These concerns focus on examination content rather than administrative procedures, indicating that meaningful change rather than incremental improvement would be required to address stakeholder concerns.

Survey results also provide clear guidance about priorities for any alternative examination. Stakeholders emphasize applied clinical competencies over theoretical knowledge, scenario-based assessment over traditional multiple-choice formats, substantially reduced costs, remote proctoring capabilities, and inclusive multi-stakeholder governance. These priorities reflect contemporary perspectives on competency-based professional assessment and workforce accessibility.

However, several important limitations constrain interpretation and application of these findings. The survey's geographic concentration in Texas (57% of respondents with location data) limits confidence in characterizing results as representing national perspectives. Voluntary participation likely over-represents strongly opinionated stakeholders relative to those satisfied with current arrangements. Substantial missing data for career-related variables (78.5% missing) creates uncertainty about findings related to professional experience. These limitations do not invalidate survey results but rather establish appropriate bounds for their application to policy decisions.

Based on survey findings and acknowledging documented limitations, proceeding with exploration and conditional development of an alternative examination appears warranted. However, this should be understood as conditional proceeding, contingent on addressing identified stakeholder concerns (particularly cost, applied content, and equity) and subject to validation of findings through broader national consultation.

Essential conditions for proceeding include prioritizing applied clinical competencies and scenario-based assessment, substantially reducing financial barriers through lower fees and remote proctoring, establishing inclusive multi-stakeholder governance, ensuring systematic attention to equity and fairness, and conducting rigorous psychometric validation. Additionally, proceeding should be accompanied by feasibility analysis addressing technical requirements, financial sustainability, interstate acceptance, and legal compliance, factors beyond this survey's scope but essential for sound policy decisions.

The alternative examination, if developed, should function as an additional pathway alongside the existing EPPP rather than as a replacement. This approach expands options for candidates while preserving existing routes, accommodating diverse stakeholder preferences documented in the survey.

In summary, survey evidence supports careful exploration of an alternative licensure pathway, with clear guidance about stakeholder priorities and conditions for acceptability. However, this support is neither overwhelming nor unconditional, and substantial work remains before determining whether an alternative can be developed that addresses identified concerns while maintaining public protection and achieving interstate acceptance. The survey

provides necessary but not sufficient evidence for final policy decisions. Additional investigation in areas beyond this survey's scope will be required to inform sound choices about whether and how to proceed.

ACKNOWLEDGMENTS

The Texas Behavioral Health Executive Council extends sincere appreciation to all stakeholders who participated in this survey. Your time, thoughtful responses, and willingness to share your experiences and perspectives have provided invaluable evidence to inform policy deliberations. The Council recognizes that licensure requirements affect your professional lives directly, and we are grateful for your investment in improving the system for current and future practitioners. Special thanks to licensed psychologists, early-career practitioners, educators, and representatives from diverse practice settings who contributed their expertise to this effort.

APPENDIX A: DETAILED METHODOLOGY

Survey Instrument

The survey included 31 questions across multiple formats: Likert-scale ratings (5-point and 3-point scales) for satisfaction, adequacy, and priority assessments; ranking tasks for stakeholder prioritization; multiple-choice and select-all-that-apply items for design preferences; open-ended questions for qualitative input on concerns, benefits, and risks; and demographic and professional background items.

All questions were optional to maximize participation and allow respondents to skip items they preferred not to answer or considered not applicable to their situation.

Statistical Methods

RStudio was used for importing, data wrangling and qualitative analysis of the survey. Quantitative analyses employed methods appropriate to data types and research questions. Descriptive statistics (means, standard deviations, medians) were calculated for continuous and ordinal variables. Frequency distributions and percentages were generated for categorical variables. Group comparisons used t-tests and analysis of variance for continuous outcomes. Ordinal logistic regression was applied to ordered categorical outcomes (adequacy ratings). Multinomial logistic regression was applied to unordered categorical outcomes (support for alternative). Correlation analyses (Spearman's rank correlation) examined associations between ordinal variables.

Qualitative Analysis

Open-ended responses underwent systematic thematic analysis. Text preprocessing included lowercase conversion and punctuation removal. Word frequency analysis identified commonly mentioned concepts. Bigram extraction identified multi-word phrases. Thematic coding used keyword searches and conceptual grouping. Theme prevalence was calculated (proportion of responses mentioning each theme). Representative quotations were selected illustrating major themes.

APPENDIX B: SAMPLE CHARACTERISTICS

Geographic Distribution

Among 665 respondents reporting location:

Texas: 381 (57.3%)

Oregon: 78 (11.7%)

Louisiana: 31 (4.7%)

Washington: 24 (3.6%)

California: 17 (2.6%)

Other states and territories: 134 (20.1%)

Professional Experience

Among 182 respondents with valid data:

0-5 years: 60 (33.0%)

6-10 years: 43 (23.6%)

11-20 years: 44 (24.2%)

More than 20 years: 35 (19.2%)

Note: 665 respondents (78.5%) did not provide usable years of practice data. Career stage analyses should be interpreted with caution given this substantial missing data.

Exam Project Workgroups – Summary of Exam Design Elements

Overall Purpose / Focus

- The exam should be designed to evaluate competency to provide entry-level, prevalent psychological services.
- Entry-level practice should be considered capable of providing some psychological services, but also knowing the limitations of a new practitioner. Candidates need to have general knowledge of all aspects of potential practice but do not need to be experts. Candidates should show they know how to identify salient issues present and start down the correct path of action.
- The exam should be designed to evaluate candidates from both APA and PC-SAS accredited programs, as well as individuals from unaccredited programs. The exam should not be designed to assess a particular curriculum or method of training, but should instead focus on ability to practice in the field.

Standard of Competency

- The exam should have entry-level focus common to all psychologists, including:
 - Assessments
 - Interventions
 - Ethics
 - Research
- Job task domains should focus on clinical practice, but should extend to other job task domains likely to be experienced by psychologists, such as:
 - Emergencies
 - Reviewing report data/records
 - Receiving a neuropsychology or other specialty report
 - Receiving a subpoena or court order
 - Being asked to consult / provide organizational advice
- The concept of protecting public safety should inform the definition of competency across domains.
- Details regarding what elements constitute psychological practice, and what competency in those practice entails, will be primarily developed through a job task analysis.
- The exam should incorporate competencies for both supervised and independent practice, with passing scores intentionally set for both levels of practice.

Job Task Analysis

- The job task analysis should focus on gathering input from psychologists in the field, with an emphasis on new(er) practitioners.

- The focus should be on actual, common practice areas. Stakeholders express a strong desire for the exam to reflect a clear connection to their practice in the field, as opposed to academic knowledge and training.
- The JTA should identify the common and core practice areas across the profession. While the core competencies may, and should, include areas all psychologists may experience, such as being involved in a legal proceeding or being asked principles of organizational human resources, the JTA should not seek to fully encompass all specialty areas of psychology, such as forensic practice or I/O.
- However, the job task analysis should also gather feedback from clinical programs to consider how practical domains align or misalign with clinical training standards.

Assessment Goals

- The exam should include an assessment of knowledge of core psychological principles.
- The exam should focus on application of knowledge in practice settings, not mere recitation.
- The exam should focus on high prevalence standards within the profession.
- The exam should focus on ability to integrate various psychological practice domains, rather than siloed content areas.
- The exam should focus on fundamentals of practice, such as
 - Critical thinking skills
 - Ability to learn/investigate new information
 - Ability to detect distractors/pseudoscience – evaluate information received.
 - Ability to describe next steps to be taken
 - Ability to come to judgments/conclusions
 - Process/method for assessment and diagnosis, instead of the correct diagnosis/answer
 - Understanding of limitations and self-care
 - Understanding of duties of care
- The exam should include assessment of softer skills (i.e. cultural awareness, personal interaction).

Assessment Methods

- All exam items must be objectively scorable.
- The assessment tools must be scalable to a national exam program.
- The exam should include multiple choice and other traditional question formats.
- The exam development team should consider incorporating more interactive and qualitative formats, while keeping objective scoring and validity in mind.

Exam Forms and Structure

- The structure of the exam (i.e. one section vs. multiple components) should be determined based on the definition of competency developed by the Job Task Analysis
- The JTA should identify the key areas of competency each candidate must show, and the exam form should ensure candidates meet competency in each area.
- The exam development team should start from the expectation that a single, comprehensive score is set for passing, but should consider whether any individual components are so important as to deserve their own passing score within the exam.
- The exam development team should consider the feasibility, once the exam structure is developed, of allowing candidates that fail a portion of the exam to retake only that portion.

Exam Delivery / Accommodations

- The exam should have guidance documents, practice tests, and other support material available to candidates.
- The exam should be available at national testing centers.
- The exam should have a remote proctoring option for a defined accommodation/disability or for especially rural candidates.
- The time limit for taking the exam should only be based on limitations necessary for secure testing administration.
- The exam should provide score reports to candidates with detailed information related to questions missed, such as underlying principles or concepts.
- While the initial rollout of the exam should be done in English, the exam program should look for opportunities in time to provide the exam in other languages.

Exam Validity / Review

- The exam must meet modern psychometric standards regarding test creation and validity.
- The exam must meet psychometric and regulatory standards for at least Texas, California, Florida, and New York, including any necessary independent review processes.
- The exam development process should incorporate a robust program for validations, including but not limited to beta testing, pilot testing, independent review, exam accreditation, and a validity assessments (i.e. content validity, concurrent validity, discriminant validity, and known group sampling).

Exam Analysis / Updates / Bias Review

- The exam program should include Differential Item Functioning (DIF) analysis to detect bias.

- The exam program should include bias sensitivity panels to review exam items prior to use.
- The exam program should incorporate substantial collection of demographic information from candidates to allow latent regression analysis to be done to identify differential performance factors.

Texas Psychology Exam Project
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+ 847 survey respondents from 45 states, territories, and provinces

Texas Psychology Exam Project

Technical Advisory Group Feedback

1. Overall Assessment of Competency

To define competency, can that be fully accomplished as part of the job task analysis?

Technical Advisory Group Discussion

Members of the Technical Advisory Group agreed that a Job Task Analysis can play a central role in defining competency, particularly for purposes of defensibility and legal review. Conducting a practice or job analysis was noted to be especially important in addressing potential challenges related to fairness or bias in the exam.

The group discussed the types of competencies that the JTA would target, noting that licensure examinations most commonly assess knowledge and the application of knowledge. Members emphasized that the examination should focus on a candidate's ability to recognize relevant issues and determine appropriate courses of action in professional situations.

The committee also discussed whether the exam could meaningfully assess skills in addition to knowledge. Examples raised included:

- Technical skills, such as the use of specific therapeutic approaches (e.g., Socratic dialogue)
- Relational or interpersonal skills, such as counseling ability or cultural responsiveness

Members noted that certain skills may be difficult to measure directly through a written examination and may instead be reflected indirectly through scenario-based questions that evaluate the application of professional judgment.

The Technical Advisory Group also discussed who should be included in the JTA sample. Members emphasized that the job analysis should primarily reflect the experiences of current practitioners, as they are best positioned to identify the knowledge and tasks that are most important for competent practice. While training expectations may overlap with practice demands, the group emphasized that practitioners should drive the identification of critical knowledge and tasks, rather than relying solely on training standards.

The group also reiterated earlier concerns that the framing of the proposed exam appeared largely oriented toward clinical or health service psychology, and that other licensed practice areas, such as industrial-organizational psychology, may have substantially different practice demands. As a result, licensing boards may ultimately need to determine which competencies are most critical for their regulatory purposes and whether different practice areas should be addressed differently in a licensure examination framework.

2. Assessment of demonstrable competency

What are the pros and cons of separating portions of the exam into a traditional knowledge assessment and a practical/skills-based assessment?

Is there merit and validity arguments to defend fully integrating an assessment of knowledge and skills through demonstration of application of knowledge?

What assessment methods are objective and scalable that could be used to assess knowledge and skills?

Technical Advisory Group Discussion

Members of the Technical Advisory Group discussed potential advantages and disadvantages of separating knowledge-based and skills-based components of the exam. Several members emphasized that the application of knowledge is particularly important in the context of licensure examinations because of the exam's role in protecting the public. The committee noted that the ability to interpret information, recognize important issues, and determine appropriate next steps in professional situations is central to competent practice.

At the same time, members also noted that certain foundational knowledge remains essential. Examples discussed included core measurement and assessment concepts such as standard error of measurement and interpretation of standard scores, which are necessary for psychologists to interpret test results appropriately and make sound professional judgments.

Several members noted that separating knowledge and applied components may allow each to be assessed using formats best suited to the construct being measured. Knowledge can be assessed efficiently using objective-response formats such as multiple-choice questions. Skills, by contrast, may benefit from more complex item formats designed to capture decision making, reasoning, and professional judgment.

Separating knowledge and applied components may also provide advantages from a measurement and operational perspective, including clearer score interpretation and greater control over psychometric procedures such as dimensionality, calibration, and score reporting. In addition, separate sections may simplify item development and test construction. However, some members noted that separating the constructs could introduce reliability considerations, as each section would require a sufficient number of items to produce stable scores. As a result, dividing the exam into separate knowledge and skills sections may require a larger total number of items to maintain adequate reliability.

That said, some members emphasized that professional competence in practice is inherently integrated, and separating knowledge from application may create an artificial distinction. Integrating knowledge and applied reasoning within case-based scenarios may better reflect how psychologists apply knowledge in professional contexts.

One member noted that an application-focused approach could involve structured, stepwise scenarios in which candidates demonstrate increasingly complex decision-making processes. For

example, tasks might progress from demonstrating skills in straightforward contexts to more complex or culturally nuanced situations.

The committee also discussed the potential use of situational judgment items or similar scenario-based formats. Members cautioned that these item types may present test security challenges, as the scenarios can be distinctive and easier for candidates to remember and share. As a result, these items may need to be replaced more frequently to maintain exam security. For examinations with lower candidate volumes, the need for frequent replacement of such items may make them less practical.

Overall, the discussion reflected that both approaches could be valid. Some members suggested that a hybrid design might provide the most balanced solution, combining a foundational knowledge component addressing core public-safety content with case-based or scenario-based items designed to measure judgment, integration of information, prioritization, and next-step decision making. Some members also noted the potential for process-based or sequential decision tasks that capture how candidates work through professional problems over multiple steps.

The committee generally emphasized that exam design decisions should balance valid measurement of applied competency with practical considerations related to development, scoring, cost, and administration.

Use of Artificial Intelligence / Open ended responses

The committee expressed cautious opinions that AI may someday be used in a licensure exam to score more open-ended, response driven assessment methods. Currently, the technology has moved beyond some of the early limitations in its ability to qualitatively score written responses, such as having to rely on length of answer as a factor in scoring. Some assessments are now using AI scoring that looks for key words and concepts, which gets closer to a qualitative assessment. However, this still falls short of the ability to fully analyze and score a written response for knowledge and application of those concepts.

The advancement of technology generally, though, may present opportunities for open-ended short responses that can be more objectively scored. For example, exam takers could be presented a scenario and then asked to identify a diagnosis. The exam can have a pre-established list of all DSM diagnoses. The exam taker can be required to type in a diagnosis fully, or begin typing and choose from available answers that are displayed. In this way, the exam taker must initiate the answer as an open-ended response, but still ultimately selects from answers that can be objectively scored.

With the growth of AI over the next few years, while the exam would be developing, it is also possible that true short answer responses about symptoms, diagnoses, or treatments could be effectively assessed for required key words/concepts using AI.

3. Exam Validation

What steps, tools, benchmarks, etc., should we make sure to require of the test development vendor?

What is the proper use of predictive validity in licensure examination?

Technical Advisory Group Discussion

Members of the Technical Advisory Group emphasized that strong psychometric validation and defensibility should be central requirements for the examination. The committee noted that any vendor selected to develop the exam should demonstrate expertise in modern test development practices, psychometric modeling, and licensure examination design.

The committee indicated that vendors should follow established professional testing standards, including widely recognized guidelines for educational and psychological testing. Vendors should demonstrate the ability to support defensible validation processes, including job or practice analyses, blueprint development, item development procedures, and statistical evaluation of test performance.

Members noted that the vendor should have demonstrated experience with objective scoring methods, particularly for examinations incorporating case-based or scenario-based items. Where more complex item formats are considered, the vendor should provide clear evidence that scoring methods are reliable, standardized, and defensible.

The committee emphasized the importance of ensuring that exam content is closely aligned with professional practice, typically through a rigorous practice or job task analysis. Vendors should be able to demonstrate how exam content is derived from and supported by such analyses.

Members also discussed the potential use of multiple item formats, including case-based questions and other formats designed to assess applied judgment. If interactive elements such as video or audio scenarios are considered, the vendor should demonstrate experience implementing such formats while ensuring accessibility and appropriate accommodations.

One suggestion raised was that the vendor should be able to develop a sample or pilot form of the examination that could be independently pilot tested or reviewed by an external body prior to full implementation.

The committee also emphasized the importance of strong security procedures, data management practices, and ongoing psychometric monitoring, including evaluation of item performance, exam reliability, and fairness across candidate groups.

Predictive Validity

From a validation perspective, there was strong agreement that content validation remains the primary foundation for defensibility, with a clear linkage from job analysis to test blueprint to item development. Members noted the lack of a universally accepted external criterion for professional competence reinforcing the importance of a content-based approach. Even among

leading organizations such as Educational Testing Service have described the difficulty with external criterion. While group differences in outcomes such as pass rates can be examined when data permit, these must be interpreted cautiously and in the context of appropriate standard setting.

The discussion acknowledged the broader measurement literature showing relationships between ability measures and outcomes such as academic performance and income while also recognizing ongoing debate about interpretation and fairness. Exams like the SAT illustrate the complexity as they measure developed knowledge and skills but remain correlated with general ability.

Multiple members discussed the challenges associated with establishing predictive validity for licensure examinations. Members noted that there is currently a lack of widely accepted criterion measures capable of meaningfully evaluating professional competency over time

One member suggested that predictive validity could be examined by comparing licensure exam performance to a more comprehensive clinical assessment. The committee noted that no such standardized assessment currently exists and that developing one would introduce significant complexity. As a result, this approach was not considered practical or relevant for licensure purposes.

Members also discussed the distinction between measuring minimal competency at the point of licensure and attempting to predict professional performance at a later point in time. Professional performance may be influenced by many factors unrelated to the licensure examination, including supervision, experience, workplace context, organizational factors, motivation, professional development opportunities, and practice setting.

Because of these limitations, members expressed significant reservations about the usefulness of predictive validity studies for licensure examinations. The committee generally viewed predictive validity as impractical and of limited relevance for licensure decisions and noted that it would be unreasonable to require predictive validity as a standard for licensure examinations.

Members also noted that professional licensure examinations historically have not been designed or validated using predictive validity evidence, and that such evidence has not been required to establish the defensibility of high-stakes licensure examinations. Further, no licensing exam meets a standard of demonstrating predictive validity.

While the concept of predictive validity continues to be of interest to some stakeholders within the broader community, the committee emphasized that validation of professional entry examinations has traditionally relied on content validity supported by systematic practice analyses and ongoing psychometric evaluation, rather than attempts to predict future professional performance.

Members also discussed that validation should be understood as an ongoing process rather than a binary determination. Rather than viewing an exam as simply “valid” or “not valid,” validation involves accumulating evidence from multiple sources, including practice analyses, content development procedures, statistical analyses of exam performance, and ongoing monitoring of exam results.

Measuring Competency vs Predicting Good Practice

Building on the earlier discussion of predictive validity, members discussed the distinction between measuring competency at the moment of testing and attempting to predict future professional performance.

The committee generally agreed that the primary goal of a licensure examination should be to measure competency at the time of testing, ensuring that candidates possess the knowledge and judgment necessary for safe entry-level practice.

Members noted that while one might reasonably expect that a candidate's current competency would relate to their later professional performance, demonstrating this relationship empirically is difficult for the reasons previously discussed.

Several members also emphasized the importance of recognizing the limits of what an examination can measure. For example, knowledge of ethical guidelines can be assessed through examination, but knowledge alone does not necessarily predict ethical behavior or professional conduct over time.

Members suggested that exam documentation should acknowledge these limits and clarify that the exam measures knowledge and decision-making relevant to entry-level competency, rather than attempting to directly predict long-term professional behavior.

The committee also noted that assessment methods should strive for ecological validity, meaning that testing tasks should approximate real-world professional situations as closely as possible. Scenario-based or case-based approaches may help support this goal by requiring candidates to apply knowledge and judgment in contexts resembling professional practice.

Predictive Validity as a Policy Consideration

In light of these considerations, members discussed whether predictive validity should be considered a reasonable goal for an examination intended to measure entry-level competency.

Several members suggested that predictive validity may represent an unreasonable or impractical goal for licensure examinations, given the methodological challenges and purpose of the examination previously discussed. Some members noted that while predictive evidence may provide supplemental evidence, establishing such evidence could require longitudinal studies conducted over many years, which would likely be outside the scope of the core exam validation process.

The committee generally indicated that content-based validation linked to job or practice requirements should serve as the primary form of validity evidence for licensure examinations. Predictive evidence, if pursued, could potentially be explored through longer-term research efforts separate from the development and validation of the exam itself.

Ultimately, the committee's consensus was that dissatisfaction with the current exam may be better addressed by strengthening both the definition and assessment of competence and more effectively determining whether candidates are prepared to deliver services rather than relying on

predictive validity evidence. The committee emphasized that licensure examinations are best designed to assess the competency required for safe entry into practice instead of attempting to predict long-term professional performance. However, it was recognized that some stakeholders strongly advocate for assessing predictive validity. As such, the committee suggested that consideration be given to including a predictive validity study in the RFP process, with the understanding that such work would be exploratory and supplemental to core validation efforts. Based on proposed costs and staff resources, the board could determine the appropriate level of emphasis to place on this work.

4. Adaptive Assessments

What are the pros and cons of using adaptive testing in this examination?

Technical Advisory Group Discussion

Members of the group discussed the potential advantages and disadvantages of using adaptive testing methods for the proposed examination.

Several members noted that adaptive testing can provide efficiency advantages, particularly when assessing knowledge-based content. Adaptive exams can adjust item difficulty based on a candidate's responses and may allow testing to terminate earlier once it has been statistically established that a candidate has passed or failed. In addition, adaptive testing can allow candidates who are near the passing threshold to answer additional items that help confirm a pass or fail decision.

Members also noted that adaptive testing can support more advanced routing and termination rules, potentially allowing the exam to focus on items that are most informative for estimating a candidate's ability.

However, several potential limitations were also discussed. Effective adaptive testing typically requires large, well-calibrated item pools, which may be difficult to establish for a new testing program. Members noted that adaptive testing significantly increases item needs (5x to 10x the item requirements), both to support calibration and to maintain secure item rotation over time. For this reason, several members suggested that adaptive testing may be more appropriate for a mature testing program with a large and well-developed item bank, rather than as an initial design approach.

Members also noted that adaptive testing may place greater demand on highly discriminating items, which can lead to those items being administered more frequently. Over time, this may increase pressure on item development efforts and create additional challenges related to maintaining item security and replenishing the item pool.

Another issue discussed was candidate perception and acceptance. Some candidates report concerns that missing early questions may negatively affect their exam outcomes, even though this perception is generally inconsistent with how adaptive scoring functions.

The committee also discussed the implications of adaptive testing for candidate score reporting. When all candidates receive the same exam form or sections, it may be easier to provide detailed feedback by content area, which can help candidates understand their performance and prepare for future attempts. Adaptive testing can make this type of feedback more complex, depending on the exam design.

Members also noted that while adaptive approaches may be feasible for knowledge-based assessments, implementing adaptive methods for skills-based or complex scenario-based items could be more difficult depending on the format used.

Overall, the committee indicated that adaptive testing offers potential efficiency advantages, but it also introduces operational, psychometric, and development challenges. Members suggested that adaptive testing may be best considered after a testing program has matured and developed a sufficiently large and stable item bank, rather than as a starting design for a new licensure examination program.

5. Identifying and Preventing Bias

Other than a traditional committee that reviews performance on individual questions to identify potential bias, item analysis, and DIF, are there other processes or tools you recommend to prevent bias?

Technical Advisory Group Discussion

The Technical Advisory Group discussed methods for identifying and mitigating bias beyond traditional approaches such as item analysis, DIF, and committee-based bias review. While bias sensitivity panels have limited empirical support, members noted they can be useful for identifying issues like stereotypes or problematic wording and may enhance stakeholder confidence when used as a supplementary process. DIF was affirmed as a core analytic tool, though it is limited by large sample requirements and reliance on simplified (sometimes arbitrary) group comparisons. As an enhancement, the group discussed latent regression and related modeling approaches, which allow for the inclusion of multiple variables simultaneously, estimation of underlying ability, and separation of true group differences from item-level bias. Latent regression can supplement DIF by modeling overall proficiency and examining whether observed racial differences persist after accounting for other measured candidate characteristics. Its usefulness depends on the quality and scope of available background data, and it cannot control for important influences that are not collected. Examples of potentially useful variables to collect upfront included training pathway, program, and experience level. These approaches are more flexible and can control for covariates, but should be used in addition to, not in place of, traditional DIF.

6. Exam Administration

Other than for practical reasons, is there any reason to limit the time allowed to take the exam?

What should we understand or consider about the process of translating an examination and validity? Discuss validation by language in development versus validation via translation? With a small volume of a specific language, what do you recommend? How much does dialect impact translation (Latin American Spanish vs Castilian Spanish)?

Technical Advisory Group Discussion

Time Limits

The discussion reflected broad agreement that there is no clear theoretical or psychometric rationale for imposing strict time limits on the examination. Participants emphasized that the primary purpose of the assessment is to evaluate competence, not speed, and that time constraints should not interfere with a candidate's ability to demonstrate their knowledge and skills. In this sense, the group generally supported an approach in which time limits, if used, are designed to be sufficiently generous so that the exam is not speeded for the vast majority of examinees.

From a measurement perspective, there was recognition that overly restrictive time limits can introduce construct-irrelevant variance, particularly if performance becomes dependent on reading speed, test-taking pace, or language proficiency rather than the intended domain of competence. Language differences were specifically noted as a factor that may necessitate additional time for some candidates. As such, providing adequate time was viewed as an important consideration for fairness and accessibility. It was also recommended that response time data be monitored to evaluate whether speediness is influencing outcomes, with any such effects raising potential validity concerns.

The group acknowledged that practical considerations may justify some limits on testing time. These include concerns related to test security, such as the potential for item exposure or cheating, as well as logistical constraints associated with exam administration.

One participant observed that extending time for live or proctored verbal responses may be more challenging due to the nature of real-time administration. This raised the possibility that different timing approaches may be needed depending on the format of the assessment.

Language / Translation

The discussion highlighted that language and dialect present significant challenges in test development, particularly for widely spoken languages such as Spanish and French, where meaningful differences exist across regions. There was clear agreement that one cannot assume a single translation will function equivalently across dialects, and that linguistic differences may affect both clarity and validity. Examples were offered to illustrate this point, including phrases such as "I think things will get better" or "feeling blue," which do not translate cleanly or meaningfully into some languages, underscoring the risk of construct distortion through direct translation.

Participants also emphasized that translation addresses linguistic differences but does not fully capture cultural context, which may further impact how items are interpreted. Some approaches, such as parallel development using multiple language panels, were noted as potential ways to improve comparability. However, these approaches introduce additional complexity and resource demands. An example was provided of a program that developed multiple Spanish versions to account for dialectical and cultural variation.

Several members of the group expressed caution about pursuing translation given these challenges. Concerns were raised about the difficulty of demonstrating equivalence across language versions, the limitations of methods such as differential item functioning analyses in cross-language contexts, and the broader challenge of ensuring both linguistic and cultural validity. As an alternative, some members suggested that providing extended time for candidates may be a more practical and defensible approach to addressing language-related barriers.

Overall, there was strong agreement that translated versions of an assessment must be approached with attention to both linguistic and cultural factors throughout the development and validation process. Equivalence across languages must be demonstrated empirically rather than assumed. It should also be recognized that translation itself may introduce more challenges than it resolves.

AI translation

The members of the group raised significant concerns about the validity of offering an AI-translated version of the exam alongside the original English as an accommodation. This approach assumes that a fully equivalent translation can be produced in real time, which participants viewed as unlikely given the complexity of language and the need to preserve meaning across contexts. From a standards and validity perspective, it was emphasized that when multiple language versions are used, there must be evidence that scores have the same meaning and support the same decisions, including equivalence in construct measurement, difficulty, and interpretation. The group expressed concern that this process probably not meet these requirements without rigorous SME review.

Practical constraints were also noted, including challenges integrating AI into secure testing environments and the risk of flawed or inconsistent translations. Overall, the group's view was that this approach would likely not be a defensible option.

7. Options for Exam Division / Modularized

What psychometric impacts do you see with options to making the exam modular / customized? Please advise on the test length required to provide a valid pass score by domain.

Technical Advisory Group Discussion

The group explored the distinction between a single, comprehensive exam and a modular approach (e.g., one 200-item exam versus four 50-item modules). Both compensatory models (where strengths in one area offset weaknesses in another) and conjunctive or multiple-hurdle models (where candidates must pass each module independently) were discussed as viable options. The choice between these approaches was seen as dependent on the profession's priorities and the results of the job analysis. For example, in safety-critical professions, such as aviation, a conjunctive model may be more appropriate because no single area of weakness can be offset by strengths elsewhere.

There was discussion about the implications for how competence is conceptualized. A modular approach requiring candidates to pass each section may better ensure minimum competence across domains but it may not capture consistency of performance across the full scope of practice. A single compensatory exam may allow candidates to demonstrate overall competence. If they have relative weaknesses in specific areas this can be offset by strengths in other areas.

Members also noted that modular testing could potentially improve eventual pass rates by breaking the exam into smaller components. This should be balanced against concerns about maintaining standards, and ensuring consistent competence. Certain domains (Ethics) were identified as potentially warranting stricter standards or higher cut scores regardless of the overall model.

Overall, both modular and comprehensive approaches were considered defensible provided they align with how competence is defined and are supported by the practice analysis. The group noted that most licensure exams are treated as measuring a single overall construct of professional competence even though performance may vary across specific content areas.

The group noted that test length by domain depends on achieving adequate reliability for high-stakes decisions. With typical inter-item correlations of a domain composed of about 20 items would yield an estimated reliability of approximately .78, which is generally considered insufficient. As a result, for a modular approach to test individual domains, roughly double the number of items per domain would likely be needed to reach acceptable reliability levels.

Masters / Supervised practice versus Ph.D. / Independent practice

The group concurred that differences in scope of practice between supervised and independent practitioners should determine design. One approach would be to maintain a single exam and establish different performance standards through the standard-setting process. In this model, separate cut scores could be set to reflect the differing expectations for supervised versus independent practice. However, this approach may include content that is less relevant for those practicing under supervision.

Alternative approaches include incorporating both directly into the job task analysis or conducting separate JTAs which would result in different blueprints and distinct exam forms. This would be likely be more relevant in content. However, supervised practice candidates that later apply for an independent license would be required to take a separate exam. Overall, the group noted that different defensible options exist.

Rule: 465.10. Basis for Scientific and Professional Judgments.

Action: Proposed Amendments

Comment: The proposed amendment clarifies that a licensee's professional judgment must be supported by appropriate information and must be based on the individual client receiving services.

§465.10. Basis for Scientific and Professional Judgments. Licensees rely on scientifically and professionally derived knowledge when making professional judgments. Professional judgments must be supported by information and techniques sufficient to provide appropriate substantiation for such findings. Licensees must base all clinical or professional judgments and services on an assessment, evaluation, or diagnosis of the individual client.