

LICENSING AND EXAMINATION COMMITTEE SUPPLEMENTAL MEETING MATERIALS

MARCH 24, 2011

Included in this supplemental package are the following agenda item materials:

- VI. Discussion and Possible Action Regarding the National Counselor Examination and the National Clinical Mental Health Counselor Examination

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To: Licensing and Examination Committee

Date: March 17, 2011

From: Kim Madsen
Executive Officer

Telephone: (916) 574-7835

Subject: Discussion and Possible Action Regarding the National Counselor Examination and the National Clinical Mental Health Counselor Examination

Background

During the July 28, 2010 Board meeting, the Board directed staff to continue working with the National Board for Certified Counselors (NBCC) to address Board concerns with the national exam in an effort to continue moving forward toward California acceptance of the national exam for Licensed Professional Clinical Counselor (LPCC) licensure.

At the November 4, 2010 Board meeting, Dr. Tracy Montez, Applied Measurement Services, LLC (AMS), provided an update regarding the efforts to address the concerns with NBCC. Dr. Montez emphasized that NBCC is very willing to work with the Board. Further, AMS had received permission from NBCC to present information from their discussions in a public format.

Dr. Montez specified the concerns and provided the response from NBCC as noted below.

- **Job analysis work:** This is also known as the occupational analysis. The job analysis involved a limited number of SMEs, and they typically worked with a committee. In California, there are several committees and many SMEs are involved in the job (occupational) analysis. NBCC responded that they will explore using larger groups and SMEs from California in their next occupational analysis.
- **Examination Development:** This involved a limited number of SMEs, and they typically worked with a committee. In California, there are several committees involved in examination development and many SMEs are also involved. NBCC responded that they will explore using larger groups and SMEs from California in their next examination development.
- **Passing scores:** NBCC agreed that if California would become a jurisdiction, NBCC would release their detailed content outline, also known as the examination plan, which they keep confidential. Candidates should know what they are being tested on. NBCC shared their passing rates, which range from the low 60's to the high 80's with the average around 78-80% for the National Counselor Examination (NCE).

The passing rates for the other clinical exam, National Clinical Mental Health Counselor Examination (NCMHCE), ranged between the 60's to 70's. These passing rates are high; however, the Board does not have to adopt both exams.

- Test administration: NBCC contracts with a vendor that uses sites that are used for other non-testing purposes. California's vendor is not allowed to use its sites for anything other than testing. NBCC provided reports outlining security procedures. Dr. Montez stated that it appears that the integrity of the testing process is not compromised by the business conducted at those sites.
- Transparency of examination programs and test security: NBCC holds close its testing materials, as does California. When joining a national organization, there is an expectation of being able to review data and understanding the process. Dr. Montez explained to NBCC that the Board and its psychometric vendor will request frequent updates, not annual updates. Most national programs provide only annual updates. NBCC agreed to negotiate contract language allowing the Board access to that data to the extent that it does not compromise the exams.

Dr. Montez recommended the Board continue these discussions with NBCC to move forward, to continue the relationship with OPES that has been established, and to move forward in determining which of the NBCC exams would be suitable given that they show good faith on these issues. The Board concurred with Dr. Montez's recommendation.

Progress to Date

Board staff met with OPES and AMS to request a recommendation regarding the use of the national exam for LPCC licensure. OPES and AMS were provided with all available and relevant material for their assessment. OPES and AMS recommend the use of the National Clinical Mental Health Counselor Examination (NCMHCE) for LPCC licensure along with a California specific examination.

The recommendations also include actions to include in the exam contract so that the concerns previously noted by Dr. Montez are addressed. Further, the Board should conduct an Occupational Analysis two to three years after LPCCs are licensed.

Recommendation

Conduct an open discussion regarding the recommendation submitted by OPES and AMS that the Board accept the NCMHCE exam for LPCC licensure, along with a California specific examination.

If the committee determines that the recommendation of OPES and AMS is acceptable, direct staff to present the matter to the full board.

Applied Measurement Services, LLC

March 14, 2011

Kim Madsen, Executive Officer
California Department of Consumer Affairs
Board of Behavioral Sciences
1625 N. Market Blvd., Ste. S-200
Sacramento, CA 95834

Dear Ms. Madsen:

As a result of actions taken at the November 4, 2010 Board of Behavioral Sciences (BBS) meeting and discussions with the National Board for Certified Counselors (NBCC) and the Office of Professional Examination Services (OPES), Applied Measurement Services, LLC (AMS) recommends that the BBS use the NBCC National Clinical Mental Health Counseling Examination (NCMHCE) to assess entry-level competence to practice as a Licensed Professional Clinical Counselor (LPCC) in California.

This recommendation is based on AMS' assessment performed on the NBCC NCE and NCMHCE examination program, follow up discussions and reviews of additional documents.

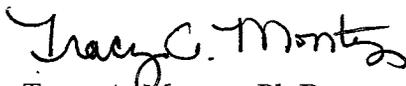
Further, this recommendation is contingent upon the following important conditions being met:

- The NBCC and BBS coordinate efforts to address the technical issues noted in the final assessment report (e.g., making public a more detailed examination plan/content outline).
- The BBS begin performing an occupational analysis 2 to 3 years after issuing LPCC licenses and use the resulting data to compare with the NCMHCE.
- The BBS utilize a supplemental examination to assess critical competencies, such as California law and ethics, not measured in the NCMHCE.
- The BBS implement regulations that authorize the use of either a national examination or a state examination for LPCC licensure.

Consistent with the methodology used in the assessment, this recommendation is based on the professional guidelines and technical standards outlined in the *Standards for Educational and Psychological Testing* and the *Federal Uniform Guidelines on Employee Selection Procedures*.

If you have comments or questions about this recommendation, you may contact me at 530.788.5346, or at Tracymontez@sbcglobal.net.

Sincerely,



Tracy A. Montez, Ph.D.
President

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MEMORANDUM

DATE	March 15, 2011
TO	Kim Madsen, Executive Officer, Board of Behavioral Sciences
FROM	Sonja Merold, Chief, Office of Professional Examination Services
SUBJECT	Licensed Professional Clinical Counselor National Assessment

Office of Professional Examination Services' Role

In a March 8, 2011 memo, you requested that the Office of Professional Examination Services (OPES) make a recommendation regarding whether to use of the National Board of Certified Counselors' (NBCC) National Counselor Examination (NCE) and/or National Clinical Mental Health Counselor Examination (NCMHCE) as part of the requirements for licensure as a Licensed Professional Clinical Counselor (LPCC).

As you are aware, due to staffing issues, OPES could not perform the National Assessment of the NCE and NCMHCE. Instead, OPES suggested that BBS hire an outside contractor to perform the study.

Dr. Tracy Montez of Applied Measurement Services, LLC, was hired and conducted a study on this topic. Her work is documented in a report entitled, "An Assessment of the National Board for Certified Clinical Counselors National Counselor and National Clinical Mental Health Counseling Examinations" dated December 2010.

OPES has reviewed a copy of this report plus several other documents including:

- The confidential detailed examination specifications for the NCE and NCMHCE from NBCC;
- Several letters from Dr. Montez to you;
- BBS Board Meeting minutes for the July 28, 2010 and November 4-5, 2010 meetings;
- A cover letter and set of confidential project notes from Dr. Montez to Bob Holmgren, OPES Supervising Personnel Selection Consultant, on Dr. Montez's national assessment of the NCE and NCMHCE;
- A letter from Dr. Montez to you dated March 14, 2011, making a recommendation regarding BBS' use of NBCC examinations as part of the LPCC licensure process; and
- A confidential copy of the NCMHCE *Self-Assessment Examination Directions and Explanations* booklet and the *Simulation Examination* booklet.

Conclusions of Dr. Montez's Study

Chapter 8: Overall Conclusions of Dr. Montez's December 2010 study lists eight areas of concern regarding the use of NBCC examinations:

1. Job Analysis:

"Limited number of SMEs involved in the process"; "task statements lacking depth and specificity"; "detailed content outlines are not considered a public document" (page 24)

2. Examination Development:

"Limited number of SMEs involved in examination development activities"; some off-site item writing" (page 24)

3. Passing Scores:

"Ability of jurisdictions to adjust passing score"; "passing scores" (page 24)

4. Test Administration:

"Test Centers used for purposes other than credentialing/licensing examinations" (page 24)

5. Examination Performance:

"Passing Rates" (page 24). [Issue 6 (see page 14) clarifies this concern.] Local jurisdictions have the option of adjusting the national cut score. Although no state has chosen this option to date, it could potentially lead to having one state license individuals who would be deemed unqualified to be licensed in another state.

6. Information Available to Candidates:

"Third-party vendor advertising for study guide and test preparation materials on NBCC website" (page 25) This is a potential security concern.

7. Test Security:

"Ability for state board jurisdictions to review complete examinations"; "ability of candidates to review items appealed" (page 25) Candidates who appeal may review their test questions. This is a potential security concern.

8. Overall:

"Recognize ongoing review of examination program expectation" (page 25)

Dr. Montez states that despite these technical issues, NBCC has "demonstrated a commitment to responding to BBS' expectations." (page 24). NBCC has demonstrated its commitment to responding positively to BBS' needs by meeting with Dr. Montez to discuss the issues and authorizing Dr. Montez to present confidential information to the Board in its public session at the November 4-5, 2010 Board Meeting.

Dr. Montez's Recommendations

Dr. Montez's recommendation is: "[T]he BBS use the NBCC National Clinical Mental Health Counseling Examination (NCMHCE) to assess entry-level competence to practice as a Licensed Professional Clinical Counselor (LPCC) in California."

This recommendation is made with the following (paraphrased) conditions:

1. The eight concerns listed above be addressed by NBCC and BBS;
2. BBS perform an occupational analysis on the newly California licensed LPCCs in two to three years;
3. BBS include in the LPCC licensure examination test battery a California supplemental examination that tests for knowledge of California-specific laws and ethics rules and any other (not yet identified) critical competencies not tested in the NCMHCE; and,
4. BBS implement regulations authorizing the use of any national examination(s) and state examination(s) for LPCC licensure deemed appropriate by BBS.

OPES Comments on Dr. Montez's Recommendations

The rationale for recommending the NCMHCE rather than the NCE or the combined NCE and NCMHCE is contained in Dr. Montez's reports. Based on Dr. Montez's reports and a review of the confidential detailed examination specifications for the NCE and the NCMHCE, it is clear that the NCE is primarily a certification examination, not a licensure examination¹. The scope of knowledge tested is quite broad and not focused on the knowledge necessary to perform specific tasks that a clinical counselor would perform on the job. The NCMHCE is more focused on the knowledge required to perform specific clinical counseling tasks.

In choosing between the NCE and the NCMHCE as the licensure examination for LPCC, the NCMHCE is the clear choice (plus a California-specific examination). In this regard, OPES concurs with Dr. Montez's recommendation.

OPES also concurs with the need to resolve the eight concerns regarding using **any** exam from NBCC. Using an NBCC exam must be conditional on NBCC's meeting Dr. Montez's concerns about exam development and administration, including:

1. Involving California LPCCs in any future occupational analysis and examination development process;
2. Providing detailed content outlines of the examination to candidates for the examination;
3. Eliminating off-site item writing;

¹ According to Kara Schmitt, in a chapter entitled, *What is Licensure?* in a book edited by James Impara, *Licensure Testing: Purposes, Procedures, and Practices* (1995), "Certification is . . . more traditionally considered a voluntary mechanism implemented by a nongovernmental entity for the purpose of recognizing more advanced or specialized skills." (page 18). "Licensure, on the other hand, is mandatory and must be obtained from a state government . . ." (page 18) The essential difference is that a licensed individual has demonstrated, at the time of *initial* licensure, the requisite minimal level of knowledge, skills, and abilities determined necessary to practice competently." (page 4).

4. Notifying BBS of any potential or actual adjustment of the national passing score by another state to permit BBS to voice its concerns and adapt as necessary;
5. Assuring that the examination cannot be compromised while being used at testing centers;
6. Allowing BBS to monitor passing rates for the examination at least quarterly;
7. Carefully monitoring the impact (security risk) of training provided by the vendor that advertises on the NBCC Web site. Making certain that no test questions have been compromised by this association with NBCC; and
8. Making certain that no test questions have been compromised by allowing individual examinees or states to review complete examinations.

In addition, OPES is in agreement that BBS should conduct an occupational analysis of California LPCCs two to three years after licensure begins in California and that a California-specific examination should be added to the licensure test battery. The California-specific examination should contain items on the California Laws and Ethics rules to be followed by LPCCs and any additional (yet to be determined) California-specific knowledges not covered by the NCMHCE.

The recommendation to implement regulations authorizing the use of the NCMHCE for LPCC licensure must be conditional on meeting the above requirements. However, since OPES is already under an Intra-Agency Contract with BBS to create a full LPCC licensure examination, failure of NBCC to meet the requirements in Dr. Montez's and OPES' recommendations would allow BBS to use the OPES-developed examination.

If you have any questions about this information, please do not hesitate to contact me at (916) 575-7265.

cc: Bob Holmgren, Supervising Personnel Selection Consultant, Office of Professional Examination Services
Tracy Rhine, Assistant Executive Officer, Board of Behavioral Sciences
Tracy Montez, Ph.D., President, Applied Measurement Services, LLC