

**From:** Krista Edwards <[krista@bspninc.com](mailto:krista@bspninc.com)>  
**Sent:** Wednesday, September 4, 2024 5:10 PM  
**Subject:** Public Comment for the next Board Meeting

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Hello, my name is Dr. *Krista Edwards* and I am writing to the board to express my concern regarding the EPPP (Part 1-Knowledge) pass rates and the impending addition of the EPPP (Part 2-Skills) in January 2026. To date, there is documented evidence that strongly suggests a racial disparity in the pass rates of Black/African American and Hispanic/Latinx test takers compared to their White counterparts (Saldaña, Callahan, & Cox, 2024; Sharpless, 2019; Sharpless, 2021). ASPPB has made the claim that there is no racial bias in the EPPP but lacks adequate data to counter what has been uncovered in the literature thus far. Personal anecdotes from individuals within these communities who have been expressing their frustrations for years also indicate the need for a deeper investigation into this matter. I myself have taken the test twice and failed both times with a score between 480-495. I am excited to give back to the community and went to an APA accredited university and completed an APPIC internship, graduating with a 3.9 GPA. As a psychologist who is currently studying for this exam to retake again, I have identified many problematic aspects of the test which I will share a few below. It is infuriating to be encouraged to practice from a social justice lens while also being forced to study information that is racist, homophobic and outdated.

**Please see some of my notes below:**

*There is virtually nothing about same sex parenting in regard to child rearing or development*

*Queer/trans children are grossly overlooked.*

*Sex/gender are used interchangeably which is incorrect usage of the terms (which I am sure I do not need to explain)*

*The EPPP definition of Bilingualism referred to as someone who speaks English and another language which centers English, another perspective that is rooted in white supremacy*

*The EPPP definition of code-switching is based on a **linguistics** definition in which many of us know as culturally responsive practitioners there is a completely different definition in the **psychology** field (<https://www.psychologytoday.com/us/blog/achieving-health-equity/202012/what-is-code-switching>). However EPPP fails to acknowledge this.*

*Lastly, I was appalled at how outdated racist theories remain in the study material and for what reason? Not only does the EPPP grossly ignore any nonwestern psychological theories and ideas, it further perpetuates anti-xyz (you name it), we are forced to learn this information to prove we are competent enough to practice. One of the disgusting theories of development was Khlobergs 1966 gender identity model which perpetuates gender stereotypes and completely ignored gender queer, fluid, trans, and questioning people.*

Because of these serious concerns, I am requesting that the board investigate how the current Part 1 cutoff score is contributing to the dearth in representation of BIPOC psychologists and implement appropriate strategies to address this concern, which includes considering changing

the cutoff score to align with the data. Additionally, I am asking that you all take a firm stance against EPPP (Part 2-Skills) and follow the Texas State Board of Examiners of Psychologists' lead in submitting a request to ASPPB and support the bylaws amendment vote which takes place at the meeting on October 31 to November 2 in Dallas Texas.

As an advocate for advancing the psychology profession for all psychologists of diverse backgrounds, it's important to ensure transparency and accountability to reduce the gap in service delivery and systematic barriers experienced by ethnic minority and Black psychologists. Now is the time to take corrective action that can not only positively impact the lives of individuals pursuing a license but also ensure more access to qualified and capable clinicians for community members. Thank you for your consideration. I could go on and on but as I study for this flawed test, I am reminded by unethical gatekeeping like this needs to end now. Given these few examples of the flawed and problematic content that is used to justify autonomous practice, I am urging the board to oppose EPPP- 2 and change the pass score for EPPP-1 until a new, revised test is developed.

Krista Edwards, PhD (she/her) [what's this?](#)  
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Check out [www.bspninc.com](http://www.bspninc.com)

BSPN's mission is to co-create a powerful network of Black School Psychologists nationwide, a safe place where Black School Psychologists feel supported and encouraged. In addition, provide culturally responsive professional development and resources to enhance the work and well-being of Black School Psychologists, including graduate students.