

State of Arizona
Office
of the
Auditor General

PERFORMANCE AUDIT

**BOARD OF
PSYCHOLOGIST
EXAMINERS**

Report to the Arizona Legislature
By Debra K. Davenport
Acting Auditor General
August 1999
Report No. 99-13

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**STATE OF ARIZONA
OFFICE OF THE
AUDITOR GENERAL**

DEBRA K. DAVENPORT, CPA
DEPUTY AUDITOR GENERAL

August 2, 1999

Members of the Arizona Legislature

The Honorable Jane Dee Hull, Governor

Ms. Maxine McCarthy, Executive Director
Board of Psychologist Examiners

Transmitted herewith is a report of the Auditor General, A Performance Audit of the Board of Psychologist Examiners. This report is in response to a May 27, 1999, resolution of the Joint Legislative Audit Committee. The performance audit was conducted as part of the Sunset review set forth in A.R.S. §§41-2951 through 41-2957.

We found that the Board generally fulfills its responsibilities efficiently and effectively. The Board issues licenses in a timely manner, resolves complaints appropriately and timely, and provides accurate and complete information to the public. However, we found problems in the way the Board administered its oral exam—the final step to receive a license. There were a number of examiner errors and we found the Board did not consistently follow its procedures. Problems with the exams led the Board on several occasions to review, and later change to passing, the scores of a number of persons who originally failed the exams. Reacting to problems we identified, the Board discontinued the oral exam before this audit report was issued.

This report also addresses the potential benefits of increasing public member representation on the Board and the need for the Board to seek statutory authority to keep its licensure candidates' exam scores confidential.

As outlined in its response, the Board agrees with all of the report's findings and all but one of the recommendations. In particular, the Board has already addressed the issues raised in Finding I of the report (see pages 9 through 18), by discontinuing its oral exam in June 1999. However, the Board does not agree with the recommendation that the

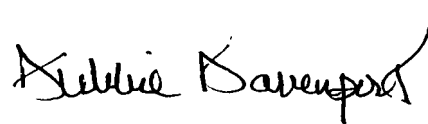
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Legislature consider changing the Board's statutory composition to increase the public membership percentage on the Board so that it is closer to 50 percent.

My staff and I will be pleased to discuss or clarify items in the report.

This report will be released to the public on August 3, 1999.

Sincerely,

A handwritten signature in black ink that reads "Debbie Davenport". The signature is written in a cursive style with a prominent flourish at the end of the last name.

Debbie Davenport
Acting Auditor General

Enclosure

SUMMARY

The Office of the Auditor General has conducted a performance audit and Sunset review of the Board of Psychologist Examiners (Board) pursuant to a May 27, 1997, resolution of the Joint Legislative Audit Committee. The audit was conducted as part of the Sunset review set forth in Arizona Revised Statutes (A.R.S.) §§41-2951 through 41-2957.

The Board's responsibilities include issuing and renewing licenses to qualified psychologists; conducting investigations and hearings concerning unprofessional conduct; disciplining violators; and providing consumer information to the public. Currently, the Board licenses approximately 1,300 psychologists. This audit found that in most respects, the Board fulfills its responsibilities efficiently and effectively. On average the Board receives approximately 50 complaints a year and resolves them appropriately and in a timely manner. The Board also issues licenses in a timely manner and provides accurate, complete, and accessible information to consumers. However, the Board has experienced problems with the oral examination it has used to assess whether candidates are qualified to practice as psychologists.

Board Has Experienced Problems with Oral Exam (See pages 9 through 18)

This audit identified numerous problems with the administration of the Board's oral exam. After audit research was completed, the Board voted at its June 1999 meeting to discontinue the use of its oral exam due to a lack of resources. This exam, which was taken after a candidate had met training and experience requirements and passed a national written exam, tested for requirements that were specific to practicing in Arizona. As the last step in the Board's licensing process, its accuracy in determining which candidates are qualified to practice was therefore extremely important. Review of the last three sets of exam

results showed that examiners repeatedly made mistakes in evaluating candidates' responses. The Board attempted to address these mistakes by listening to exam tape recordings to re-score failing exams and change the outcome from fail to pass for some candidates. However, the actions taken were inconsistent from candidate to candidate. For example, the Board reviewed the complete tape recordings of the exams for 6 candidates who failed, but did not review the complete tape recording of the exam for another candidate whose final score was 74, only 1 percent below passing.

These problems stem from the Board's not taking the necessary steps to develop and administer its exam appropriately. Although the exam's content is appropriate, the exam is deficient in other respects, such as the lack of a clear rationale for why its "pass point" score of 75 percent is the appropriate dividing line between passing and failing. Training provided to examiners is not sufficient, certain board policies regarding the exam are not being followed, and the Board's quality control process failed to identify examiner error and ensure accurate scores.

The Board has several options for addressing these problems. First, the Board could invest the additional resources and effort to ensure its oral exam is appropriate. Second, the Board could replace its own oral exam with one currently being developed by the Association of State and Provincial Psychology Boards. Third, the Board could discontinue its oral exam as it voted to do at its June 1999 meeting. Fourth, if the Board wishes to further assess a candidate's qualifications beyond the national written exam already being used, it could develop a more limited written exam to test only an applicant's knowledge regarding Arizona law, as other Arizona regulatory boards do.

Other Pertinent Information (See pages 19 through 21)

In addition to assessing the Board's performance, auditors also gathered information regarding reciprocity options that could make it easier for applicants already licensed by another state to get a license in Arizona. Most of these options would require statutory changes to current licensing requirements in Arizona. The Board is currently considering a couple of these options.

Sunset Factors **(See pages 23 through 29)**

As part of the Sunset review process, this audit recommends increasing the number of public members on the Board. The 9-member Board currently has 2 public members. Past Auditor General reports have recommended that regulatory boards have 50 percent public membership to increase the potential for public advocacy. The Legislature should consider amending A.R.S. §32-2062 to increase the public membership percentage on the Board so that it is closer to 50 percent. It is also important that these public members be selected and trained to increase the potential for them to fulfill their public advocacy role successfully.

This audit also recommends that the Board make changes to better comply with Open Meeting Laws and to better protect the confidentiality of candidates' exam scores. Although the Board complies with most requirements of the Open Meeting Laws, it has historically discussed issues regarding its oral exam in Executive Session. However, the Board's statutory authority for discussing matters in Executive Session does not extend to issues related to the oral exam. As of its April 1999 board meeting, the Board has discontinued this practice and should ensure that all future discussions on this topic are conducted during the public session of board meetings. Further, this audit recommends that the Legislature consider amending the Board's statutes to keep individual candidates' exam scores confidential in order to protect their privacy. Other regulatory boards in Arizona have this authority.

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INTRODUCTION AND BACKGROUND

The Office of the Auditor General has conducted a performance audit and Sunset review of the Board of Psychologist Examiners (Board) pursuant to a May 27, 1997, resolution of the Joint Legislative Audit Committee. The audit was conducted as part of the Sunset review set forth in Arizona Revised Statutes (A.R.S.) §§41-2951 through 41-2957.

Board Responsibilities

Laws 1965, Chapter 102, §1, established the Arizona Board of Psychologist Examiners. Initially, the Board regulated psychologists by certifying them. In 1991, the Board's statutes were amended to increase the level of regulation from certification to licensure, thereby defining the practice of psychology. The Board's mission is:

To protect the health, safety and welfare of Arizona citizens by regulating the psychology profession.

The Board accomplishes this mission by performing a variety of functions, including ensuring that persons practicing psychology possess required qualifications by issuing and renewing licenses; conducting investigations and hearings concerning unprofessional conduct; disciplining violators; and providing consumer information to the public. Currently, the Board licenses approximately 1,300 psychologists and on average, receives approximately 50 complaints a year.

Statutory Licensure Requirements

The Board's statutes and rules contain the following general education, experience, and examination requirements for psychologist licensure:

- A doctoral degree in clinical, educational, or applied psychology from an accredited psychology program, including specific coursework hour requirements in subjects such as ethics and treatment;
- Completion of a 1,500-hour internship, supervised by a licensed psychologist, that includes requirements for specific hours of client contact and supervision;
- Completion of a 1,500-hour post-doctoral supervised experience, overseen by a licensed psychologist, who has legal responsibility for the intern's actions; and
- Passage of the national written examination with a 70 percent point score.

A.R.S. §32-2072 requires a written exam and allows the Board to implement an additional examination to cover areas such as ethics and other areas the Board determines are suitable. From 1995 until its June 1999 meeting, the Board chose to implement an oral exam. Finding I of this report (see pages 9 through 18) contains information regarding problems the Board experienced with its oral exam.

Organization and Staffing

The Board consists of nine governor-appointed members, who serve five-year terms. Seven of the members must be licensed psychologists. At least two of the psychologist members must be full-time faculty members from the state universities and at least three must be in professional practice. Board statute also requires two public members. Board members also serve on committees with individual responsibilities such as oral exams, office operations, and license applications.

The Board is authorized four FTEs who provide assistance and support to the Board and its committees. An executive director monitors compliance with Board orders and oversees the staff, who are responsible for collecting application, renewal, and other fees; processing application files; investigating complaints; and providing information to the public.

Budget

The Legislature appropriates monies to the Board from the Board of Psychologist Examiners' Fund. This fund contains revenues derived principally from the Board's collection of licensure application and renewal fees. The Board deposits 90 percent of its revenues into the Board of Psychologist Examiners' Fund and remits the remaining 10 percent to the State General Fund. Table 1 (see page 4), illustrates the Board's actual and estimated revenues and expenditures for fiscal years 1997 through 1999.

Generally Board Is Efficient and Effective

The Board generally appears to fulfill its responsibilities efficiently and effectively. However, the Board has experienced problems related to its oral exam (see Finding I, pages 9 through 18).

Board issues licenses in a timely manner—Once an applicant meets all licensure requirements, the Board issues a license in a timely manner. Until June 1999, the Board's application process required applicants to submit a complete application and be deemed qualified by the Board prior to taking the two required exams that were offered twice a year. As a result, the Board issued licenses only two times a year after the oral exams. To assess the timeliness of the Board's licensure application process, auditors calculated the days between the applicant's oral exam date and the date the Board issued the applicant's license. For the past two fiscal years, on average, the Board took 54 days to issue a license. This time includes scoring the exam and waiting until action can be taken at the next bimonthly board meeting.

Complaints are resolved in a timely manner and appropriately—The Board's complaint handling is timely and resolutions appear appropriate. Analysis of the Board's complaints for the past three fiscal years found the median time frame from receipt to resolution was 135 days, well below the 180-day standard

Table 1

**Arizona State Board of Psychologist Examiners'
Statement of Revenues, Expenditures, and Changes in Fund Balance
Years Ended June 30, 1997, 1998, and 1999
(Unaudited)**

	1997	1998	1999
	(Actual)	(Actual)	(Estimated)
Revenues:			
Licenses, fees, and permits ¹	\$418,179	\$ 46,350	\$437,500
Fines and forfeits	14,400	100	1,100
Charges for goods and services	4,198	6,204	2,000
Other	<u>1,979</u>	<u>10</u>	<u> </u>
Total revenues	<u>438,756</u>	<u>52,664</u>	<u>440,600</u>
Expenditures:			
Personal services	123,669	130,205	142,700
Employee related	20,735	19,626	25,800
Professional and outside services ²	45,503	18,490	43,300
Travel, in-state	3,828	3,116	6,800
Travel, out-of-state	3,266	1,433	2,500
Other operating	27,716	32,081	51,300 ³
Capital outlay	<u>5,879</u>	<u> </u>	<u> </u>
Total expenditures	<u>230,596</u>	<u>204,951</u>	<u>272,400</u>
Excess of revenues over (under) expenditures	<u>208,160</u>	<u>(152,287)</u>	<u>168,200</u>
Other financing uses:			
Net operating transfers out	2,086	352	3,000
Remittances to the State General Fund ⁴	<u>53,956</u>	<u>5,051</u>	<u>44,060</u>
Total other financing uses	<u>56,042</u>	<u>5,403</u>	<u>47,060</u>
Excess of revenues over (under) expenditures and other financing uses	152,118	(157,690)	121,140
Fund balance, beginning of year	<u>312,416</u>	<u>464,534</u>	<u>306,844</u>
Fund balance, end of year ⁵	<u>\$464,534</u>	<u>\$306,844</u>	<u>\$427,984</u>

- ¹ Licenses and fees revenue fluctuates yearly because most psychologists renew their licenses in odd-numbered fiscal years.
- ² Expenditures for professional and outside services decreased by approximately \$26,500 in 1998, because the Board relocated and no longer incurred shared costs for accounting services, receptionists, etc. However, the Board expects to incur additional expenditures for external accounting services, law clerks, court reporting, investigations, rule writers, and computer consultants in 1999; therefore, the estimate includes the cost of these services.
- ³ The Board estimated an increase in other operating expenses between 1998 and 1999 of \$22,300 for printing and postage costs associated with providing newsletters and revised statutes and rules to its licensees, information technology, rent increase, repair and maintenance, supplies, and conferences and training.
- ⁴ As a 90/10 agency, the Board remits 10 percent of its gross revenues to the State General Fund.
- ⁵ Fund balance is unreserved and undesignated; however, the amount is subject to legislative appropriation.

Source: The Arizona Financial Information System *Revenues and Expenditures by Fund, Program, Organization, and Object* and *Trial Balance by Fund* reports for the years ended June 30, 1997 and 1998; and Board-estimated financial activity for the year ended June 30, 1999 (actual amounts not available at the time of this report).

used in previous Auditor General regulatory board reports. Further, by recently hiring a full-time investigator, the Board has reduced the number of complaints that exceed the 180-day standard. Another step that has helped in this regard is that the Board discusses the status of every open complaint at each Board meeting, in part to ensure its timely resolution.

Board properly adjudicates complaints and monitors disciplined psychologists.

Audit work indicates that the Board also adjudicates complaints appropriately. Options open to the Board include dismissing a complaint, filing a letter of concern, or imposing disciplinary penalties that range from a decree of censure to license revocation. The Board has adopted a Substantive Policy Statement that provides criteria for resolving complaints. For example, according to policy, statutory violations should receive greater sanction than a letter of concern. Observations of two board meetings and review of board minutes for the past three years indicate that the Board's decisions meet these criteria. Further, recent board actions and review of board files indicate that the Board conscientiously monitors disciplined psychologists to ensure compliance with board orders.

The Board also involves the complainant and the accused psychologist appropriately in the complaint process. For example, board policy requires that complainants and accused psychologists be interviewed during the investigation, and a review of board files confirms this policy was being followed. Further, the Board provides complainants and accused psychologists with opportunities to address the Board and sends surveys to them to obtain feedback about how the complaint was handled. Survey results showed that the majority of complainants and accused psychologists expressed satisfaction with complaint investigations and the opportunity to provide comment.

Board provides accurate and complete information to the public.

Public information accessible and appropriate— The Board also appropriately provides information to consumers regarding Arizona licensed psychologists. The Board's public information policies require that staff provide the public with information regarding the number and type of both closed and pending complaints, and resolution of closed complaints. Auditor test calls to the Board confirmed that these policies were correctly implemented. Further, board staff were timely and courteous in providing information, in one instance assisting the caller in identifying psychologists in a remote location. The Board's

policies and actions also ensure that confidential information is not inappropriately released. Finally, a review of the Board's complaint database and files indicate that the information provided to the public is also accurate and complete.

The Board makes information available to the public in other formats as well. The Board recently developed an Internet Web site that includes the Board's annual meeting schedule, newsletter, and consumer guide. The newsletter contains information about the Board's disciplinary actions for the past two years, including the name of the disciplined psychologist and the disciplinary action taken, as well as articles to assist licensees in understanding regulatory issues.

Audit Scope and Methodology

Audit work focused on how well the Board performs its responsibilities. Specifically, research focused on whether the Board has met national standards for its oral exam, and consideration of reciprocity options that could simplify the licensure process for applicants already licensed by another state. Additional audit work assessed the efficiency and effectiveness of board processes including licensing, complaint handling, and providing public information.

This performance audit and Sunset review includes one finding and recommendations in three areas:

- The need for the Board to improve its oral exam, or discontinue its use;
- The need for additional public representation on the Board; and
- The need for the Board to comply with Open Meeting Law requirements.

To evaluate the Board's oral exam, auditors identified nationally accepted standards for licensure oral exams and compared these standards with Board policies and procedures. The documents reviewed to identify national oral exam standards

are listed in the Appendix (see page a-i). Specific audit work included:

- Observation and review of all procedural aspects of the Board's February 1999 oral exam, including examiner training and 9 of the 27 exam sessions; review of all 27 candidates' examiner rating forms; review of Board score change documentation; and review of candidate and examiner feedback surveys.
- Review of the 9 originally failing candidates' examiner rating forms for the July 1998 exam; documents submitted by candidates protesting the July 1998 and February 1998 oral exams; results and Board statistical analyses of all 8 oral exams held between June 1995 and February 1999; and pertinent Board policies, statutes, and rules.
- Interviews with national and local experts in oral exams and test scoring; and with officials from four state psychology boards with similar oral exam structures.¹

To evaluate whether reciprocity options were available that could simplify the licensure process for applicants already licensed by another state, auditors compared Arizona's general psychologist licensure requirements to the 49 other states' licensure requirements and the Association of State and Provincial Psychology Board's Model Licensure Act; and identified currently available reciprocity programs.

Auditors used a number of approaches to gather information about how the Board handles licensing, complaints, public information, and other related matters. Specifically, auditors reviewed a random sample of 33 complaint files from the past 3 fiscal years to determine whether the Board followed investigation and discipline policies, monitored disciplined psychologists, and maintained an accurate complaint database. In addition, a random sample of 10 new licensure files from the past 2 fiscal years was reviewed to assess the Board's documentation of applicants' credentials and the accuracy of the Board's licensure database. Auditors also used the Board's complaint and

¹ Auditors interviewed officials from California, Colorado, New Mexico, and Nevada.

licensure databases to verify the timeliness of complaint resolution for the past three fiscal years and the licensure application processing for the past two fiscal years. Further, auditors reviewed Board public information policies and procedures and made 5 test calls to determine compliance. Auditors also reviewed recent literature regarding public membership on regulatory boards as well as 49 other state psychology boards' public member representation. Finally, auditors reviewed Open Meeting Law statutes and related Board statutes and meeting minutes.

This audit was conducted in accordance with government auditing standards.

The Auditor General and staff express appreciation to the Board of Psychologist Examiners, Executive Director, and staff for their cooperation and assistance throughout the audit.

FINDING I

BOARD HAS EXPERIENCED PROBLEMS WITH ORAL EXAM

Problems with how the Board of Psychologist Examiners' oral exam was administered call into question the reliability of the testing process as a basis for making licensing decisions. Auditors' examination of recent test results showed that scoring errors were common and that attempts to address these errors were inconsistently applied. The Board's own analyses also indicate that problems existed in evaluating candidates' responses for previous exams. The Board has several options for resolving the problem, including improving the administration of the exam, adopting a national oral exam currently under development, or replacing the oral exam with a written one.

Oral Exam Final Step for Licensure

Until June 1999, the Board's oral exam was the final step in its licensure process. Exam candidates already possessed a doctorate in psychology, had completed 3,000 hours of supervised experience, and had passed the national written exam. The Board chose to additionally require its oral exam in order to assess candidates' competence to practice, or "ability to conceptually integrate and apply their knowledge" of psychology, as well as Arizona-specific laws. The exam consists of a case example and 10 questions. Volunteer licensed psychologists, selected by the Board, serve as examiners. A pair of examiners uses standardized criteria to assign 1 of 4 ratings (superior, acceptable, questionable, and unacceptable) to each candidate's responses for each question. The Board then converted these ratings into a numerical score by allocating a set number of points per rating. Finally, the Board voted to pass or fail candidates based on the numerical score. A candidate must score a minimum of 75 percent to pass. Failing candidates must wait approximately 6 months to re-take the test and pay an additional \$200 exam fee. After audit research regarding the exam was completed, the Board voted to discontinue using the oral exam at its June 1999 meeting.

Candidates had to pass the oral exam as the final step to receive a license.

Board Experienced Problems with Oral Exam

The Board has experienced a number of problems with the administration of its oral exam that call into question the accuracy of exam results. Examiners repeatedly made mistakes in evaluating candidates' responses, and when the Board attempted to address these mistakes, the actions taken were inconsistent from candidate to candidate. The Board's own statistical analyses lend additional support to the need to make improvements. Such problems can result in Board decisions that are based on information that is not fully accurate or complete.

Examiner error and Board review impacted exam results—Examiner error and the Board's inconsistent responses to that error created problems that impacted the results of the past three sets of oral exams. For exams administered in February 1999, initial examiner ratings indicated that 8 of the 27 candidates failed. Prior to adopting final scores, concerns about the initial results prompted board members to listen to exam session tape recordings and re-score the exams using the same criteria used by the original examiners. The Board reviewed 6 of the 8 initial failing exams and changed the outcome from fail to pass for 4 because Board members thought certain responses deserved higher marks. A seventh failing candidate also passed because of the Board's decision to give all candidates credit for one of the ten exam questions. The Board adopted the revised scores as its final scores at its April meeting, thereby passing 24 of 27 candidates.

It may appear the goal was to pass candidates.

However, the Board's efforts to address examiner errors for the February 1999 exam were inconsistent. For example:

- The Board did not review the full exam tape recording of one candidate who failed, although all 6 other failing candidates' full exams were reviewed. This candidate's final score was 74, 1 percent below passing. After the candidate formally requested reconsideration the Board reviewed this candidate's exam and upheld the 74 percent score.

- The Board did not review the exam tape recordings of any candidates who received passing scores from the examiners to determine whether candidates had been passed in error. Also, when Board members reviewed failing candidates' exams and decided that examiners had scored some answers too high, the Board did not decrease any scores. As a result, it may appear that the Board's purpose was to pass candidates.

Board failed 5 candidates in July 1998 in error.

Similar examiner errors and board inconsistencies occurred with the July 1998 exam. The Board adopted final scores failing 9 of the 28 candidates. After most of the candidates who failed requested a review, the Board reviewed all 9 failing exams and found errors that, when corrected, resulted in passing scores for 5 of the 9 candidates. Examiner errors included not only failure to correctly credit candidate responses, but also administrative-type errors, such as examiners assigning two different ratings to the same question. The 4 candidates who were not passed after this review further appealed the exam results. After receiving legal advice in executive session, the Board eventually passed all 4 candidates with a score of 75 percent.

Problems also affected the Board's February 1998 exam. When 1 of the 6 failing candidates requested reconsideration of her 70 percent score, board review identified 7 errors that, when corrected, raised the candidate's score from 70 to 74 percent, still not high enough to pass. Errors included failure to properly document ratings and to follow question rating criteria.

Board's own statistical results did not meet national standards for past exams.

Statistical analyses also indicated problems on past exams – The Board's own statistical reliability analyses have indicated problems with past oral exams. National standards indicate that for licensure exams, examiners should agree on a candidate's rating on a question or overall score at least 80 percent of the time. The Board's analysis of all 5 exams prior to February

1998 showed that examiner correlation ranged from 51 percent agreement to 78 percent.¹

Licensure decisions impacted by exam problems—Problems with the oral exam may have led to incorrect licensure decisions. The Board has relied on the oral exam to determine whether its applicants are qualified to practice psychology. If scores are not accurate, qualified candidates may not be licensed, and unqualified candidates may be licensed. Further, candidates are personally, financially, and professionally impacted by the oral exam scores. Therefore, it is the Board’s responsibility to ensure that the exam is scored as accurately and equitably as possible.

Board Does Not Ensure Exam Is Developed and Administered Appropriately

The Board has not taken the necessary steps to develop and administer its exam appropriately. Although the exam’s content is appropriate, it is deficient in other respects, such as the lack of a clear rationale for why 75 percent is the appropriate dividing line between passing and failing. Training provided to examiners is not sufficient, board policies are not being followed, and the Board’s quality control process failed to identify examiner error and ensure accurate scores.

Oral exam has been poorly developed—Although the oral exam’s content is valid, some other aspects of the exam have not been adequately developed. The Board has ensured the appropriateness of its exam’s content by using the job analysis conducted by the Association of State and Provincial Psychology Boards and specifying the specific skill that each question

¹ The Board did not have examiner correlation statistics computed for the February and July 1998 exams. Although the Board’s examiner correlation statistic for the February 1999 exam was greater than 80 percent, this result was influenced by other score changes discussed later in Finding I (see pages 13 through 14).

Finding I

tests. However, auditors' review of the tests showed development was incomplete in the following ways:

Board did not demonstrate how "pass point" differentiated between qualified and unqualified candidates.

- **Rationale for 75 as the "pass point"**—The Board has not documented a rationale for a score of 75 percent as a measure of competence. According to national testing standards, it is essential to demonstrate how candidates scoring below the pass point are not competent and candidates scoring at or above the pass point are competent.
- **Standards for developing test questions**—National standards state that one exam question should not provide the answer to another question. However, in the February 1999 exam, one of the questions provided the answer to another question.
- **Criteria for ratings**—In addition, until the February 1999 exam, the Board provided specific criteria for only one of four possible ratings examiners could give to candidates' responses. However, even with this improvement, examiners expressed concerns about the criteria's clarity. National standards require both questions and criteria to be clear and explicit to reduce the potential for examiner error.

Examiner training did not sufficiently prevent error.

Examiner training insufficient—The Board has not trained its examiners sufficiently to prevent error. National standards state that examiner training is essential to help ensure tests are administered and scored accurately. The Board provides examiners with written guidelines and a two-hour pre-exam training session. However, according to testing experts interviewed as part of the audit, the number of examiner errors identified in recent exams and reliability analyses in previous exams indicate that the Board's examiner training might not be sufficient. In fact, some examiners repeated similar errors from one oral exam implementation to the next.

Board failed to follow its policies.

Board did not follow its own policies—The Board did not follow its own policies during its February 1999 exam. The Board's examiner handbook clearly states, "Once ratings have been made, no changes are to be made." This is consistent with references reviewed for this audit, which state that examiners should make independent scoring decisions. However, during

the February 1999 exam, a board member questioned examiner pairs regarding differences in their ratings of the same candidate's performance and allowed examiners to change their ratings to more closely match their partner's ratings. Examiners changed their ratings in close to 40 percent of auditors' observations. While the changes increase the correlation between examiners' ratings, they also raise the potential for other difficulties. For example, the potential exists that some examiners may be more easily influenced to change their ratings than others, without being sure the change is appropriate. Nevada's psychology board allows examiners to change ratings only when the change is supported by the exam tape recording or documentation in examiner notes. This helps ensure that the change is appropriate.

During the same exam, after the first 9 candidates had been tested, Board members changed exam policy to give candidates credit for subsequently providing additional information on questions that had already been covered. Auditors observed some of the remaining 18 candidates supplementing their answers to previous questions, potentially increasing their ratings. Several of the first 9 candidates expressed concern that they were not given the opportunity to supplement their answers, although they were not aware that the candidates who followed them had that advantage.

Board's quality control process is insufficient—For its February 1999 exam, the Board implemented a quality control process to ensure exam procedures were followed but it was not effective in identifying all examiner error. National standards recommend that licensing agencies develop and document quality controls. During the February 1999 exam, Board members checked whether the examiner-assigned ratings of superior, acceptable, questionable, or unacceptable matched the criteria provided and whether all ratings were documented. Although the Board identified some instances where procedures were not followed, the review failed to catch many other errors. Specifically:

- Auditor review of examiner rating forms and final scores found that the Board failed to identify 9 instances out of the 270 total ratings, or 3 percent, where the examiner selected

the wrong rating. For example, one examiner rated a candidate's response "Questionable," but the criteria indicated that the candidate actually earned an "Acceptable" rating. Although these errors did not impact any candidate's pass/fail result, because ratings are converted into scores, 7 of the 27 final exam scores, or 26 percent, the Board voted to adopt were incorrect.

- Auditors also identified 1 examiner rating form where the Board failed to note that the examiner lacked proper documentation for the rating she assigned for 4 of the 10 candidate responses.

In addition, the Board lacks policies and procedures to routinely monitor oral exam sessions to determine whether examiners are appropriately administering the exam. New Mexico's psychology board places observers in every exam session to ensure exam procedures are followed and to assist in situations where examiners have questions or need clarification. Further, other states, such as California, randomly select exams for review to ensure accuracy.

Board Has Options to Address Problems

The Board has a number of options available to address problems with its oral exam. First, the Board could revise the exam, taking steps to meet national testing standards. Second, the Board could replace its oral exam with a national oral exam, currently under development, once the national exam becomes available. Third, the Board could stop using the oral exam and use the national written exam as the final step in its licensure process, as it recently voted to do. Fourth, the Board could replace the oral exam with a more limited written exam, testing only the applicants' knowledge of Arizona law.

To continue using its exam, Board must invest additional time, expertise, and resources.

- **The Board could take steps to meet national standards for its oral exam**—If the Board continues to use its exam, it should take several steps to better ensure its oral exam meets national exam standards. First, the Board should develop and document a meaningful rationale for its pass

point. Second, the Board should work with experts to improve exam questions and criteria for judging candidates' answers. Colorado does a modified pretest of its oral exam, using licensed psychologists, to identify test development problems. Third, the Board should better train examiners to help ensure exam procedures are followed. Fourth, the Board should follow established policies to help ensure its exam is appropriately and equitably scored. Finally, the Board should establish and properly implement quality control and monitoring procedures. Although these improvements would better ensure accurate licensure decisions, they would require additional effort and resources from the Board and the volunteer examiners that may not be practically possible.

- **The Board could use a national oral exam when it becomes available**—If the Board determines it lacks the resources to revise its oral exam appropriately, the Board could replace it with the national oral exam currently being developed by the Association of State and Provincial Psychology Boards (Association) as part of its efforts to encourage reciprocity. However, the national oral exam is still in the development stage and several issues remain outstanding. For example, the issues of cost, selecting and training examiners, and establishing reliability have not been resolved. Further, if the Board chooses to use an exam developed by an outside agency, national testing standards state that the Board needs to first ensure the exam's appropriateness. Although the Association anticipates the exam will be available in late 1999, the Board should wait until the national exam has been proven reliable before adopting it for Arizona's use.
- **The Board could discontinue the oral exam**—The Board could make the national written exam the final step in its licensure process. The Board voted to discontinue using its exam at its June 1999 meeting because it lacks the resources to continue conducting and improving the exam. Currently, 11 state psychology boards rely solely on the national written

After audit research was completed, the Board voted to discontinue its oral exam at its June 1999 meeting.

exam as the final test of applicants' skills.¹ If Arizona continues with this option, applicants would be licensed when they pass the national written exam.

- **The Board could replace oral exam with written exam –** Alternatively, if the Board wants to further assess applicants' qualifications to practice in Arizona, it could use a more limited written exam testing only the applicants' knowledge of Arizona law. Currently, 11 state psychology boards use some form of written exam testing applicants' knowledge of state law as their final licensure step after the applicant passes the national written exam.² Other Arizona health regulatory boards, such as the State Board of Dental Examiners, also use a written exam testing knowledge of Arizona law as part of their licensure process. Further, written exams require fewer resources to develop and implement than oral exams.

¹ As of January 1998, the states that rely on the national written exam as the last step in their licensure process are Delaware, Idaho, Illinois, Kansas, Michigan, Nebraska, New Hampshire, New York, Pennsylvania, Vermont, and Wyoming.

² As of January 1998, the states that use some form of written exam testing knowledge of state law in addition to the national written exam are Alabama, Alaska, Connecticut, Florida, Hawaii, Maryland, Massachusetts, Minnesota, North Carolina, Utah, and Virginia.

Recommendations

1. The Board must address problems with its oral exam to ensure its licensure decisions are appropriate. The Board should consider the following options:
 - a. Determining and obtaining the necessary resources to improve the Board's oral exam by establishing a rationale for its pass point, improving question and criteria development, sufficiently training examiners, following established policies, and developing and implementing quality controls;
 - b. Adopting the national oral exam once it becomes available and the Board determines its appropriateness; or
 - c. Discontinuing the oral exam and relying solely on the national written exam; or
 - d. Replacing the oral exam with a more limited written exam regarding only Arizona law.

OTHER PERTINENT INFORMATION

During the audit, other pertinent information was gathered regarding the issue of granting reciprocity to licensure applicants who possess a psychologist license from another state.

Reciprocity Options Exist

Currently, Arizona does not grant reciprocity to psychologists licensed by other states. Therefore, most options for granting licensing reciprocity to Arizona applicants licensed by other states would involve some form of statutory change. Although most of Arizona's licensing standards follow national standards, the licensing statutes include some specific provisions that other states do not require. Participation in national reciprocity programs, such as those proposed by the Association of State and Provincial Psychology Boards, would require eliminating these additional requirements. A more limited approach in which Arizona granted reciprocity only to those states that meet or exceed Arizona requirements would not require changes to current licensure standards, but might extend to relatively few states. The Board of Psychologist Examiners has several options available for further review.

Reciprocity assists candidates who may find verification requirements problematic.

Reciprocity could simplify licensure process—If psychologists licensed in good standing in other states wish to practice in Arizona, they must provide evidence that they meet Arizona licensing requirements. Reciprocity could simplify the licensure process for such persons, in that it would allow licensed practitioners who already meet current Arizona standards to bypass credential verification requirements.

Verification requirements can pose problems for candidates who completed these requirements many years ago. Applicants for licensure are required to provide original documentation of such things as educational transcripts and supervised experience, which could be a difficult process for candidates who completed their internships years ago and are unable to pro-

vide verification. Reciprocity would mean not having to provide such documents.

Arizona licensure standards generally follow Model Licensure Act.

Arizona's licensure requirements generally follow national standards but include some additional requirements as well— Arizona's general licensure requirements are based on the Model Licensure Act of the Association of State and Provincial Psychology Boards. To illustrate, Arizona follows the model by requiring a doctoral degree in psychology from an accredited program, 3,000 hours of supervised experience, and a score of 70 percent on the national written exam. Like all other states, Arizona also uses the Association's national written exam.

However, Arizona's statutes also include specific provisions, such as coursework in ethics, assessment, and treatment, that are not included in the model act. The act permits such provisions, but the specific provisions Arizona has added may differ from other states' specific requirements. These differences create some problems for establishing reciprocity agreements.

Using existing national reciprocity programs would require statutory change—The Association of State and Provincial Psychology Boards is promoting two reciprocity-oriented programs. The first, called the Agreement of Reciprocity, requires participating states to recognize the psychology licenses issued by other participating states. The second, the Certificate of Professional Qualification in Psychology (CPQ), requires participating states to license psychologists who have met the Association's credential requirements. Currently, 7 states participate in the Agreement of Reciprocity and 5 states recognize psychologists' CPQ certification.¹

To participate in either program and treat all applicants equally, Arizona would have to eliminate any specific statutory requirements not included in the reciprocity program's requirements. For example, Arizona requires its licensees to have a doctoral degree from a designated psychology program. In contrast, CPQ allows a doctoral degree from a non-psychology-

¹ As of April 1999, the following states participate in the Agreement of Reciprocity: Iowa, Kentucky, Mississippi, Missouri, Nevada, Oklahoma, and Texas. The following states recognize CPQ certification: California, Kentucky, Mississippi, Ohio, and Oklahoma.

designated program. Given this difference, Arizona would be denying its resident applicants equal treatment by holding them to a different standard than out-of-state applicants seeking licensure through CPQ reciprocity.

Some reciprocity programs could limit Legislature's authority over licensure standards.

To fully participate in either program, the State would essentially cede legislative authority over psychologist licensure requirements to the Association's Board. Both the Agreement of Reciprocity and CPQ require member jurisdictions to accept the minimum standards established in the program's contracts. Further, full participation in either program requires member states to accept changes to credential standards made by the Association's Board of Directors. As a result, Arizona's licensure standards would be determined by the Association's Board. For this reason and other concerns, the Arizona Psychological Association voted to oppose Arizona's participation in either reciprocity program.

Board has reciprocity options for review—A number of reciprocity options are available for Board review. One is participation in CPQ, which the Board is currently evaluating. While the Agreement of Reciprocity represents a second option, there is another variation that could allow the State to keep its unique requirements and still participate in reciprocity, though to a more limited degree. This variation would be to establish limited reciprocity with states that meet or exceed current Arizona licensure requirements. Currently at least 7 states allow licensure by endorsement for psychologists licensed by states with similarly stringent requirements.¹ However, because such agreements would be limited only to those states whose regulatory requirements matched Arizona's, the number of states could be small. A third option would be for the Board to review its statutory requirements and determine if possibilities exist to make them more comparable to other states' requirements. For example, the Board already plans to seek a statutory change to its supervised experience requirements to make them more similar to other states' licensure provisions.

¹ The states that allow licensure by endorsement for applicants licensed by states with similar or more stringent requirements include Colorado, Florida, Illinois, Indiana, Missouri, Vermont, and Wyoming.

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SUNSET FACTORS

In accordance with A.R.S. §41-2954, the Legislature should consider the following 12 factors in determining whether the Arizona Board of Psychologist Examiners (Board) should be continued or terminated.

1. The objective and purpose in establishing the Board.

The Board was established in 1965 to certify psychologists in Arizona. In 1991, the Board's statutes were amended to increase the level of regulation from certification to licensure. The Board's mission is "To protect the health, safety and welfare of Arizona's citizens by regulating the psychology profession."

The Board has established goals to meet its mission. These goals include: 1) efficiently processing licensure applications; 2) completing investigation and adjudication of complaints in a timely manner; and 3) protecting the public through implementation of a program of continuing education to assure that licensees maintain and continue to improve their competence in providing psychological services.

2. The effectiveness with which the Board has met its objective and purpose and the efficiency with which it has operated.

This audit identified problems with the Board's oral exam that impact the appropriateness of Board licensure decisions. The Board has experienced problems with the oral exam that make it an inappropriate tool to assess candidates' qualifications. Problems result from the Board not taking the necessary steps to properly administer its exam. The Board has options to improve the exam or discontinue its use (see Finding I, pages 9 through 18).

However, the Board is generally efficient and effective in implementing its mission and objectives (see Introduction and Background, pages 1 through 8). The Board's effectiveness includes:

- Issuing licenses in a timely manner,
- Resolving complaints appropriately and in a timely manner;
- Responding to public information requests thoroughly, accurately, and in a timely manner; and
- Maintaining its database completely and accurately.

3. The extent to which the Board has operated within the public interest.

Although the Board operates in the public interest by timely and appropriately disciplining psychologists, the Board's oral exam is not an appropriate tool to ensure that psychologists are competent to practice in Arizona (see Finding I, pages 9 through 18).

The Board could potentially do more to operate in the public interest if its public membership was increased closer to 50 percent. Previous Auditor General reports recommend that public membership of regulatory boards be 50 percent. Currently, the Board's statutes require seven members to be licensed psychologists and only two, or approximately 22 percent, to be public members. To increase public membership closer to 50 percent, the Legislature would need to amend A.R.S. §32-2062. Auditors identified other states with psychology boards that had a higher percentage of public representation. For example, in 1998, California's Legislature added another public member to the California Board of Psychology. California's Board now consists of nine members, four of whom are public members. An increase in public membership could potentially increase consumer advocacy on the Board.

In order to increase the potential for public members to be effective advocates for the public, they must be selected and trained for that purpose. As discussed in a previous Auditor General report on the health regulatory system (see Report No. 95-13), public members should receive training on the importance of their public protection role. The Governor's Office for Excellence in Government offers training for board members; however, the training does not include information on the importance of their public protection role.

4. The extent to which rules adopted by the Board are consistent with the legislative mandate.

The Board promulgates rules pursuant to A.R.S. §32-2063(A)(9). At the Office of the Auditor General's request, the Governor's Regulatory Review Council reviewed the Board's statutes and determined that the Board has developed all the rules that are required by statute.

5. The extent to which the Board has encouraged input from the public before adopting its rules, and the extent to which it has informed the public as to its actions and their expected impact on the public.

The Board encourages public input before adopting its rules, and in most respects, it complies with Open Meeting Laws. The Board has complied with public notification requirements for adopting rules and invites the public to discuss any matter at the beginning of every Board meeting. The Board complies with Open Meeting Laws regarding posting public meeting notices and meeting agendas at least 24 hours in advance, as well as requirements for keeping minutes of meetings. Finally, the Board sends customer satisfaction surveys to complainants, accused psychologists, and licensure applicants to solicit feedback on its processes.

In one respect, however, the Board did not comply with Open Meeting Law requirements. Open Meeting Laws state that an Executive Session can only be used for legal advice, employee-related issues, consideration of rec-

ords exempt by law from public inspection, and specific negotiation topics. However, the Board historically discussed oral exam issues in Executive Session on the advice of its former Attorney General representative. The Board has no statutory authority that makes oral exams exempt from public disclosure or that permits the Board to discuss any issues regarding the oral exam in Executive Session. By discussing all aspects of the oral exam in Executive Session, the Board denied exam candidates information regarding the oral exam's appropriateness. As of its April 1999 board meeting, the Board has discontinued discussing the oral exam in Executive Session. The Board should ensure that future discussions regarding the oral exam take place during the public session of board meetings unless its statutes are modified.

6. The extent to which the Board has been able to investigate and resolve complaints that are within its jurisdiction.

The Board is granted the authority to perform investigations and resolve complaints pursuant to A.R.S. §32-2063(A)(1) and A.R.S. §32-2081. This audit concludes that the Board investigates and resolves complaints in an appropriate and timely manner.

The Board's disciplinary process appears adequate. To resolve complaints, the Board has various options available to it, ranging from dismissal to license revocation. The Board has expanded its complaint resolution options as recommended by the Auditor General's Office in the Board's 1989 Sunset review (Report No. 89-3). The Board has added the use of letters of concern and decrees of censures to its complaint resolution options. Further, the Board has established and implemented guidelines for disciplining violators. In 1996, the Board created a staff investigator position. Prior to establishing this position, the Board contracted for investigations or the Board members themselves performed the investigations. Finally, once disciplinary action is taken, the Board ensures compliance by monitoring the disciplined psychologist.

7. **The extent to which the Attorney General or any other applicable agency of state government has the authority to prosecute actions under the enabling legislation.**

Pursuant to A.R.S. §41-192, the Attorney General has the authority to prosecute actions and represent the Board. A.R.S. §32-2061 and 32-2081 define violations and establish penalties. The Board recently referred one complaint that involved insurance fraud to the Attorney General's Office for criminal prosecution. Pursuant to A.R.S. §32-2083, the Board may also petition the Superior Court to prevent an unlicensed person from practicing psychology, or to stop the activities of a licensee that are an immediate threat to the public.

8. **The extent to which the Board has addressed deficiencies in its enabling statutes which prevent it from fulfilling its statutory mandate.**

The Board has sought a number of statutory changes recently to address deficiencies in its statutes. In 1999 the Board sought and legislation was passed to increase licensure and exam fee caps for the first time since 1990. Additionally, in 1996 the Board proposed and the Legislature passed statutory changes regarding the release of records, not issuing an annual report, and other clarifications. Finally, in 1995 legislation passed to amend the Board's statutes to include sexual intercourse with a current or former client within two years after the end of treatment as unprofessional conduct, to allow the Board's executive director to issue subpoenas, to increase board member compensation, and other clarifications.

9. **The extent to which changes are necessary in the laws of the Board to adequately comply with the factors listed in the Sunset review statute.**

The Legislature should consider modifying A.R.S. §32-2062 to increase the number of public members on the Board closer to 50 percent (see further discussion under Sunset Factor 3, page 24).

Additionally, the Legislature should consider modifying the Board's statutes to keep a candidate's exam scores confidential. Other Arizona regulatory boards, including the Veterinary Medical Examining Board, have the statutory authority to keep the candidates' exam scores confidential.

10. The extent to which the termination of the Board would significantly harm the public health, safety, or welfare.

Terminating the Board would harm the public health, safety, and welfare, because without it, the practice of psychology would not be regulated. Without regulation, consumers of psychological treatment would lack protection from unprofessional conduct and the assurance that their psychologists meet appropriate standards. Additionally, psychologists must be licensed in order to receive medical insurance and governmental reimbursement for psychological services. Finally, no other state agency performs a similar function of licensing psychologists.

11. The extent to which the level of regulation exercised by the Board is appropriate and whether less or more stringent levels of regulation would be appropriate.

Prior to 1991, the Board certified psychologists rather than licensed them. This level of regulation is somewhat less stringent, in that it does not require the scope of practice to be defined. The Auditor General's Office concluded in its 1989 report (Report No. 89-3) that certification was an adequate level of regulation. However, in 1991 the Legislature decided to employ a higher level of regulation and amended the Board's statutes from psychologist certification to psychologist licensure. Currently all but three states (Arkansas, Montana, and Washington) license rather than certify psychologists.

12. The extent to which the Board has used private contractors in the performance of its duties and how effective use of private contractors could be accomplished.

The Board currently uses private contractors for such services as court reporting, and occasionally, for rule writing and complaint investigations. The Board has also used private contractors for oral exam statistical analysis. Further, the Board also uses licensed psychologist volunteers to develop and administer the Board's oral exam. These volunteers earned continuing education credits for their services.

There are potentially further opportunities for the Board to use private contractors. The Association of State and Provincial Psychology Boards (Association) is currently developing a national oral exam. The Board could contract with the Association to use the national oral exam as a replacement for its oral exam once it is available and deemed appropriate. If the Board decides to continue to use its own oral exam, it may want to consider contracting with experts to help develop and review the oral exam (see Finding I, pages 9 through 18).

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Agency Response

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Board Members

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Maureen K. Lassen, Ph.D.
Vice-Chair
Gary D. Lovejoy, Ph.D.
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July 26, 1999

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Mr. Douglas R. Norton
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Dear Mr. Norton:

Enclosed is the Final Response of the Arizona Board of Psychologist Examiners to the Performance Audit conducted in response to a May 27, 1997, resolution of the Joint Legislative Audit Committee.

The Board of Psychologist Examiners wishes to compliment your staff on the thoroughness of your investigation, the comprehensiveness of your final report and your sensitivity to the Board and consumers of psychological services. Most importantly, the Board appreciates the fact that the audit report reflects a high degree of confidence in the Board's performance by stating that the Board is generally efficient and effective in fulfilling its responsibilities.

If the Board or its staff may be of further assistance, we would be pleased to accommodate you.

Sincerely,

T.H. Guerin, Jr.
Chairman of the Board
Public Member
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BOARD OF PSYCHOLOGIST EXAMINERS

FINAL RESPONSE TO PERFORMANCE AUDIT CONDUCTED BY THE OFFICE OF THE AUDITOR GENERAL

INTRODUCTION AND BACKGROUND

General – Board Is Efficient And Effective

The Board concurs with the Auditors' findings that it fulfills its responsibilities efficiently and effectively in the following areas:

- Issuing licenses in a timely manner
- Resolving complaints in a timely and appropriate manner
- Providing accurate and complete public information in an appropriate manner

FINDING 1 – Problems with Oral Exam

The Auditors performed a very thorough review of the Board's oral examination process. The Board acknowledges certain problems identified by the auditors in several areas.

OPTIONS TO ADDRESS ORAL EXAM PROBLEMS

The finding of the Auditor General is agreed to and the recommendation to discontinue the oral examination has already been implemented as the Board had been reviewing this issue for a number of months.

The Board, at its meeting of June 4, 1999, voted to discontinue its use of the oral examination due to lack of resources to continue to conduct and improve the examination procedures, and to eliminate the oral examination requirement for all applications filed after June 4, 1999.

OTHER PERTINENT INFORMATION

During the audit, other pertinent information was gathered regarding the issue of granting reciprocity to licensure applicants who possess a psychologist license from another state. Several of the options outlined by the Auditors have merit.

The Board has formed a committee to study the topic of reciprocity and mobility and will continue to explore strategies to address these issues to ensure protection of the citizens of Arizona.

SUNSET FACTORS

- Increasing Public Membership on Board (Sunset Factor No. 3)
The Board respectfully disagrees with this recommendation.

The Board is operating effectively and efficiently with the current makeup of the Board. The Board's seven professional members are the best qualified to judge their peers due to their education and diverse technical expertise in dealing with complex psychological issues. As stated in a report published by the Auditor General's Office in December of 1995, (Report

No. 95-13), most studies conclude that adding public members made no significant difference in Board performance.

Expanding the number of public members on the Board would possibly have an adverse impact on the Board's budget, resulting in increases in per diem, travel, and lodging expenses.

- Open Meeting Law Compliance (Sunset Factor No. 5)
The finding of the Auditor General is agreed to and the recommendation has already been implemented.

The Board complies with the Open Meeting laws; however, the Board was historically unaware that it could not discuss oral examination issues in Executive Session. It was the policy of the Board over the years, based upon advice from representatives of the Attorney General's Office, to discuss both oral and written examination scores in Executive Session on the belief that the scores were confidential. Once the Board received legal advice from its Assistant Attorney General, the Board followed the legal advice and discussed oral examination issues only in public sessions.

- Revisions to Board's Statutes (Sunset Factor No. 9)
The Board agrees with the finding regarding modifying the Board's statutes to keep a candidate's examination score confidential and the recommendation will be implemented.

The recommendation to revise Board statutes to keep examination scores confidential has merit. The Board will review the statutory language of other Arizona regulatory Boards, such as the Veterinary Medical Examining Board, for assistance in drafting statutory language.

Appendix

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Appendix

- Hill, Diane. An Assessment Tool in Credentialing: The Oral Examination for Licensure. *Comprehensive Clinical Psychology*, Volume 2, 1998. 151-160.
- Novy, D. M. Kopel, K. F. and Swank, P. R.. Psychometrics of Oral Examinations for Psychology Licensure: The Texas Examination as an Example. *Professional Psychology: Research and Practice*, Volume 27, 1996, 415-417.
- Council on Licensure, Enforcement and Regulation (CLEAR). *Development, Administration, Scoring, and Reporting of Credentialing Examinations, Recommendations for Board Members*, 1st ed. Council on Licensure, Enforcement and Regulation (CLEAR), 1993.
- Hill, D.S. Edwards, H.P. Crawford, W. Warner, J.. *Oral Examinations for Licensing or Certification: A Manual for Psychology Boards*. Association of State and Provincial Psychology Boards, 1986.
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Other Performance Audit Reports Issued Within the Last 12 Months

98-12	Arizona Universities' Enrollment	99-4	Adult Probation
98-13	Private Enterprise Review Board	99-5	Department of Gaming
98-14	Adult Services	99-6	Department of Health Services – Emergency Medical Services
98-15	Podiatry Board	99-7	Arizona Drug and Gang Policy Council
98-16	Board of Medical Examiners	99-8	Department of Water Resources
98-17	Department of Health Services – Division of Assurance and Licensure	99-9	Department of Health Services – Arizona State Hospital
98-18	Governor's Council on Develop- mental Disabilities	99-10	Residential Utility Consumer Office/Residential Utility Consumer Board
98-19	Personnel Board	99-11	Department of Economic Security – Child Support Enforcement
98-20	Department of Liquor	99-12	Department of Health Services Division of Behavioral Health Services
98-21	Department of Insurance		
98-22	State Compensation Fund		
99-1	Department of Administration, Human Resources Division		
99-2	Arizona Air Pollution Control Commission		
99-3	Home Health Care Regulation		

Future Performance Audit Reports

Arizona Council for the Hearing Impaired
Department of Building and Fire Safety
Board of Dental Examiners