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Comments on

The Consultation Paper on *Options for the protection of the public posed by the inappropriate use of psychological testing* issued by the Psychology Board of Australia May 2010

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This a public document on behalf of the APS College of Organisational Psychologists, prepared by the College's National Regulatory Developments Working Party (NRD WP)

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Contents

SECTION 1: Overview

This submission is in response to the issues posed by the Psychology Board of Australia (PBA) in its consultation paper titled Options for the protection of the public posed by the inappropriate use of psychological testing. As major users, and at times developers, of psychological tests, members of the APS College of Organisational Psychologists are significantly affected by regulations and standards relating to the use of psychological tests for occupational purposes. As such, we have a particular interest in expressing our views on any initiatives which may raise or reduce the quality of test use in Australia.

While we have cited several references in this submission, we would be happy to provide additional supporting evidence if requested. Our aim, however, is to provide a blueprint to address the complex issues associated with psychological testing and assessment. More specifically, we want to ensure that the standards, practices and ethical underpinnings associated with psychological testing and assessment are sustainable given the technological and societal developments within an increasingly globalised community.

It should also be stated that the APS College of Organisational Psychologists views this PBA initiative as a very opportune time to enhance the quality of psychological testing standards and practices at practitioner, university and test publisher/developer levels. Furthermore, we urge the PBA to take a broad approach to the definition of "stakeholders", as implementation of effective initiatives will require the support of a diverse group, particularly within the organisational domain.

Our Submission
While understanding the interest in the wide range of testing issues in the Consultation Paper, which we have addressed at length in Section 4, we first provide a concise argument in **Section 2** for our **Recommendation**, which is:

The PBA should focus on accreditation of practitioners, student and intern training, as well as public education about test and practitioner standards in order to ensure quality service delivery, with test publisher access standards linked to accreditation standards.

Our rationale for this recommendation is essentially that the existing system has not caused major complaints, and there are improved international versions of competence based accreditation processes that are forecast to be available within 12 months in the forms of the European Federation of Psychologists' Associations (EFPA) standards and accreditation model for tests and testing and the ISO 10667 workplace assessment delivery standards. These two initiatives should further reduce risks and increase quality in testing practices, if they are adopted in Australia.

Having stated our argument briefly, we recognised that the realm of workplace assessment that includes occupational testing is much misunderstood, trivialised and spoken of in confusing and contradictory ways. So, in **Section 3** we present a framework for systematically viewing the various modes of psychological testing and their implications.

The framework can also accommodate tests used in fields of psychology other than workplace assessment. The framework recognises the difference between relatively uncomplicated (actuarial) testing and the complex formation of professional opinions informed by test input and associated observations. It recognises the different combinations of testing practices and psychologists' contributions to different forms of assessment.

Our trust is that the framework will contribute to the reader's understanding of the variations and complexities of psychological testing, particularly as it is applied in workplace assessment.

The variations in psychological assessments and the accompanying testing are the bases for arguing that it is unnecessary and probably inappropriate to reserve all workplace testing activities to registered psychologists (Option 4.1 in the Consultation Paper) and very difficult, contentious and administratively demanding to adopt context specific legislation (Option 4.2).

Section 4 addresses the matters of harm raised in the Consultation Paper in the order and detail needed to explain our situation, our preferences and our recommendations. We have responded to the Board's questions with the purposes of providing information relevant to how each matter impacts in workplace assessment, and how the issues raised may best be addressed in the interests of ensuring effective and safe delivery of professional testing services.

The testing framework described in Section 3 is consistent with international developments discussed in **Section 5**, including the draft ISO standards (www.iso.org), the European EFPA 3 levels (www.efpa.eu), the International Test Commission approach (www.intestcom.org) and the BPS levels A, Intermediate B and Full Level B (www.psychtesting.org.uk). All of these standards and guidelines recognise the complexity and variations of psychological assessments and associated testing. Three attachments that detail the recent UK-EFPA and ISO developments are included in **Section 8**, while references and relevant readings are included in **Section 7**.

Section 6 concludes that legislation is too rigid and cumbersome a tool to use to manage a dynamic field such as psychological testing; a field which involves considerable subtlety, complexity, nuance and specialisation, and which is changing with increasing speed courtesy of internet and psychometric technical advances, as noted in Section 5 and exemplified in Section 8.

Instead, we submit that an integrated system linked to international standards of user accreditation, test training, publisher supply practices and public education that are all consistent with ethical standards and regulated guidelines provides the best path to quality testing practices and outcomes.

Psychological testing and assessment is a core component of the profession of psychology. While not overlooking the contributions of other sections of the profession, we believe we have a lot to offer with our specialised perspective on occupational testing, particularly given the international developments and technology impacts as discussed in our submission. We want to ensure high standards and to this end the College of Organisational Psychologists would like to work with the PBA and the peak professional body (Australian Psychological Society) in developing an integrated system that addresses the key issues to ensure test user competence in Australia.

SECTION 2: Recommendation

1. The Consultation Paper invites comments on options for protecting the public from inappropriate use of psychological testing.

2. The best answer is to ensure that those using psychological tests are competent to do so.

3. If the question is asked in the form: “Who is competent to use psychological tests?” Then, the answer might be “psychologists”. But the answer really should be “suitably qualified and experienced psychologists”.

4. If the question is asked in the form: “How do we know test users are competent to use and apply tests?” Then, the answer is “suitably qualified and experienced people are accredited to use tests”.

5. The commonality in the answers is “suitably qualified and experienced” and that can be demonstrated to the public through a transparent system of accreditation based on standards accepted by the profession and the community.

6. In Australia, to date, legitimate accreditation has been gained through test publishers’ training courses, generic and specific test training courses, internship training, and in-house training by psychologists of other psychologists and testing staffs. Such training has equipped psychologists to use a particular battery (or batteries) of tests as part of workplace assessments, and equipped assistants to administer and score particular tests as part of a workplace assessment process.

7. The USA, Canada and Europe (except UK, Norway, Sweden, Finland and Germany) have relied on similar accreditation processes to those that have prevailed in Australia.

8. Some test publishers, both in Australia and other countries, have trained and certified non-psychologists to carry out some assessment processes with a limited range of their copyrighted occupational tests.

9. In Britain, the British Psychological Society (BPS) has administered a test user training, certification and accreditation program for the past twenty years that has resulted in some 39,000 certificates being issued and with around 9,150 registrants currently included on its Register of Competence in Psychological Testing. Of these, approximately 8,000 are non-psychologists. The recently revamped BPS standards have been aligned to the EFPA 3 level model of Test User qualifications, which, in turn, was based on the International Test Commission (ITC) guidelines.

10. There is very little documented evidence of individual harm caused by inappropriate test use by psychologists. Evidence presented and comments made at the 4th International Congress on Licensure, Certification and Credentialing in Sydney in July 2010 was that the incidence of disciplinary matters of all types (and not just testing) was minute. In the BPS it was 0.0003% in 2007, and two registrants had been dealt with by the UK Health Professions Council (HPC) in its first year. In USA and Canada incidents were uniformly “low”. Disciplinary matters dealt with in NSW over a recent four year period related to 0.0005% pa of registered psychologists.

11. No similarly reliable estimates of serious disciplinary matters, including misuse of tests, by non-psychologists are available. While this could be attributed to several factors, including the lack of a suitable complaints avenue as well as an actual lack of complaints, it is worth noting that the BPS has not reported difficulties among its many thousands of certified non-psychologists over the past twenty years (over 30,000 people certified).

12. Thus, there is limited reliable evidence that the public good would be protected any more than it already is if test usage was restricted to one category of professional (viz. psychologist). On the other hand, the introduction of a practice restriction is likely to lead to a reduction in psychological test use, as noted in the PBA Consultation Paper, and an increase in the use of easily accessible but less valid assessment techniques, particularly in organisational contexts.

13. The issue is not only about the low severity of reported harm (with the extent of possible unreported harm unknown), but the potential for future harm in a testing world where market forces, globalisation and technology are having a major impact on all stakeholders in the testing process. Given these factors, we recommend the use of professional training, accreditation and public education to promote quality assured test usage by qualified individuals, rather than legislating for use of tests by all psychologists (undifferentiated and unspecified as to accredited competence to use tests).

14. Accreditation can ensure that the public is protected against inappropriate use of psychological testing, and this method of risk control and quality assurance is about to change and improve dramatically due to international developments.

15. The ISO 10667 Workplace Assessment Standard of good practice in assessment service delivery in work and organisational settings is due to be operational in 2011. It is designed to enhance the service quality experience for clients being assessed in work settings, and applies to not just psychological tests. Competence of the service provider is not defined but can be “informed”, in the case of psychological testing, by an external certification system like that offered by EFPA and BPS.

16. The ISO 10667 on Workplace Assessment provides an international standard that could be used as the framework within which to set more specific standards for accreditation of test users. This would optimise the protection of the public from misuse of psychological tests. In Australia, ISOs are controlled by Standards Australia, an organisation which licenses service providers to develop and apply the standards for Australian conditions. While not the remit of the PBA, professional psychology – based organisations, such as the APS, could become an ISO Certification body. Such organisations could establish testing standards based on the EFPA model and certify test providers and their practices under ISO. It would be in the best interests of protecting the public if the professional association that establishes professional standards (typically through its Colleges in the case of the APS) controlled the provision of ISO services by directly accrediting assessors and by accrediting other suitable service providers to accredit test users. Such accreditation programs would assist in maintaining assessment standards and highlight the importance of these standards to clients.

17. Public Education could be used to inform people about the accreditation standards held by accredited workplace assessors, and Education Courses and Test Training Programs could be informed by the published EFPA and ISO standards (and in some cases they could also be ISO accredited service providers).

18. In the past, the list of possible problems with test use has informed the training and ethics of test users and helped develop a quality culture that has prevented problems. So, undertaking the process of gaining a new form of accreditation will revisit contemporary versions of those issues and reinforce the culture of competent and appropriate test use and, thus, assist in protecting the public from inappropriate test use.

19. In essence, practice restrictions do not address the real issue underlying potential harm (i.e. the competence of the service provider) and they do not provide a suitable mechanism to anticipate or respond to future challenges. However, a hybrid model encompassing PBA policy options 3, 4 and 5 can lead to the raising of standards while enabling adaptation to future technical advances and market requirements. Psychologists in Europe and the UK have worked diligently to develop quality standards, processes and programs, and are currently extending their certification model, beyond the work/organisation and educational spheres. Let us draw on their endeavours and join them in the international psychology community.

20. Accordingly, we recommend the adoption of a hybrid approach to protecting the public from the inappropriate use of psychological tests. This approach encompasses accreditation (option 3), education (option 4) and reinforcing publisher-based restrictions (option 5). While we reject legislative restriction of the use of all occupational psychological tests to psychologists only (options 1 and 2), we recognise and support the presence of ethical guidelines and regulations encouraging and enforcing ethical practices because they are also components in an integrated system that promotes a culture of quality enhancement. In such a culture, potential harm is minimised and overall standards are raised.

SECTION 3: Occupational Testing

1. Tests and assessments: an overview

1.1 Testing is part of Assessment, and is used in various professional psychology applications.

1.2 Testing, like Assessment, is not a single process or practice; it varies according to the purpose(s) and circumstances of the Assessment.

1.3 The various testing and assessment procedures and purposes warrant differentiated consideration, rather than being treated as a unitary product/service labelled “psychological testing”.

1.4 Similarly, the risks associated with using testing tools in different assessment situations also vary with the situation and with the skills of the tester/assessor.

1.5 Consequently, the chances of inappropriate test use vary according to the skills of the tester/assessor, and the control of inappropriate use is through training, experience, professional supervision and peer review, and not through legislation prescribing who tests using what tests, or through proscribing who can’t test and what tests can’t be used.

2. The purpose of psychological test use in occupational and organisational contexts

2.1 There are many ways in which psychological tests are used in occupational contexts including employee selection, career development, leadership development, talent identification, performance management, outplacement, assessment of job-person fit, and team development, to name a few. Although the uptake of testing may be slower in small to medium size organisations, evidence (published and anecdotal) indicates that most corporations use psychological testing in some way or another for one or more of these purposes. (This use may be confined to a sub-set of tests, such as cognitive ability).

2.2 Seminal research on the (organisational) utility of psychological testing was published in the USA in the 1980s. Yet many Australian organisations (via consultancies such as Chandler & Macleod and WD Scott) have been conducting individual assessments ("psychological appraisals" was a common term) since the mid - 1950s. The Australian Defence Force (in its various guises over the years) has a rich history of psychological testing for officer selection, training allocation and general entry. These tests have always been interpreted by psychologists, although the invigilation/administration has nearly always been conducted by a trained person (non-psychologist).

2.3 In more recent years organisations have benefited from the speed, efficiency and (often) cost effectiveness of internet testing to support the implementation of systematic and structured selection and development processes at individual and group levels. Organisations have been attracted to the logistical benefits associated with internet-based testing, a major factor with a time poor workforce or in the testing of candidates based in remote locations. For example, a good deal of testing in the resources sector is conducted remotely given the rosters of employees, particularly those employed in “fly in, fly out” (FIFO) operations.

2.4 The uptake of psychological testing in selection and other human resources (HR) functions has been further supported by a growing awareness of the role of testing in best practice for selection; improved awareness of the predictive validity and reliability of tests; and the increased professionalism of human resource management (Carless, 2009).

2.5 Structured selection processes including those supported by online psychological tests with known reliability and validity are considered to be fairer to job candidates than alternative interview and resume based selection methods, particularly when the choice of tests is based on an analysis of the requirements of the role. In light of this research, it is encouraging that psychological tests and testing have become popular and more accessible to organisations in selection and in other HR functions as a result of the expansion of internet-based testing.

2.6 Psychological testing can add to the productivity of an organisation, particularly when incorporated as part of a well structured human resource strategy aligned with business and organisational values, culture and objectives.

3. The kinds of tests used in organisations

3.1 There are many kinds of tests used in organisations to meet the many purposes indicated above. Common test categories include, but are not limited to:

3.1.1 Cognitive ability tests – administered individually or in group contexts and either supervised or unsupervised. This can include those labelled "aptitude" tests.
3.1.2 Personality tests, including those designed specifically to measure work-related attributes and preferences.
3.1.3 Motivation and values profiles.
3.1.4 Career interest inventories.
3.1.5 Team and leadership style questionnaires.
3.1 6 Situational judgment tests.
3.1.7 Psychomotor and visual tracking tests.

3.2 There is also a range of other measures used in organisations that may or may not be standardised but that are nevertheless used to collect information about individuals and require the same standards of confidentiality, informed consent and expertise in interpretation that many standardised tests require. These instruments and tools are used by Human Resources specialists as well as by psychologists. They include:

3.2.1 360 degree surveys.
3.2.2 Assessment and development centre simulations, role plays, analysis-presentation exercises.
3.2.3 Climate and culture surveys.
3.2.4 Job satisfaction surveys.
3.2.5 Engagement surveys.

It should be noted at this stage that the soon to be finalised ISO 10667 (I and II), designed as an overarching framework to cover assessment in work and organisational settings, will encompass all of the above, together with other assessment techniques such as interviewing. See the article in Section 8 for more detail. The ISO will facilitate the identification and implementation of harm minimisation practices in workplace assessment.

4. Testing versus assessing

4.1 Matarazzo (1990) differentiates between “testing” and “assessment”. “Testing” can be defined as the administrative functions of instructing test takers, and timing and scoring tests. “Assessment”, on the other hand, involves the integration of test results with other observations and data for diagnostic, developmental or decision-making purposes. Similar differentiations made by other models include: “test administration and testing”; or “test administration, testing, and assessment”.

4.2 In the occupational testing context, test users who conduct “assessments” as opposed to administering tests, require a body of knowledge to guide:

- the choice of appropriate tests,
- the interpretation of results against job requirements,
- predictions about job performance and development outcomes, and
- the minimisation of adverse impact and measurement bias;

to name a few elements. Knowledge of a test score in relation to a particular norm group is clearly insufficient for the more complex judgements that underlie selection decisions. To be fair to candidates, particularly those at risk of adverse impact, the use of tests requires sensitivity and skill.

4.3 Testing, at the base level, does not require a registered psychologist and Murphy, Hodson and Gallas (2010) provide a good example of this in the Australian Defence Force.

5. Testing and assessment practices

5.1 Testing and assessment procedures can vary from actuarial predictions to professional opinions, as indicated in the table “Testing and Assessment Practices: a Framework” on page 13. For example:

5.1.1 At the actuarial end of the spectrum, specific aptitude tests with predictive and/or concurrent validities can be applied, generally within specific workplaces, to make specific outcome predictions using decision rules. In-house validated tests and military trade selection tests are examples. The administration and scoring of such tests have been done for many years by suitably trained people who are not registered psychologists, while some reporting has been done by psychologists and some done by trained human resources professionals.

5.1.2 In the middle range between actuarial predictions and professional opinions, general ability and aptitude tests with factorial, concurrent and/or predictive validities can be used to make general probability predictions about likely performances in defined job families. Examples are vocational guidance, management recruitment and career development testing and assessments. For many years this testing has been done by suitably trained people who may or may not have recently graduated with a psychology major, while the assessment has been done by an experienced assessor who is most likely a suitably experienced psychologist.

5.1.3 At the professional opinions end of the spectrum, general ability and general personality tests with construct and/or factorial validities can be used to form professional opinions and to provide complex descriptions of a person's behaviour in a range of activities such as management and leadership. Examples are assessments for talent management, executive selection and succession planning. The test administration and scoring has often been done by the professional psychologist who does the assessment report, but has also been delegated to a suitably trained graduate assistant or similar senior administrator who can report observations of participants' behaviours during testing.

5.2 In **occupational testing and assessment**, experienced professional psychologists usually conduct the test interpretation, assessment reporting, and client and participant feedbacks, while the tests may be administered and scored by a suitably trained and experienced graduate or administrator. Quality checks are usually done on the test administration and scoring by the assessing psychologists, who also provide peer supervision for each other. Although there are differences between professionals from time-to-time about the tests used and the reports generated, these are usually shown to be professional preferences or legitimate variations of the use and application of tests and variations in report writing styles.

5.3 The **contemporary and prospective challenges** from internet-based offerings have been followed and monitored by practitioners, academics and test publishers over the past 20 years, and the main issue is users who do not provide invigilation for on-line testing. When forced to use internet delivered assessments for initial screening, experienced psychologists usually back up with additional testing and assessment before forming opinions and/or making recommendations. Inappropriate use of internet testing has not been evident as an ethical, or "harm" issue for professional psychologists, mainly because of the existence of strong standards and guidelines (as noted in Section 4) and the emphasis placed on good test practice by publishers and the profession. Given the increasing use of the internet for testing purposes however, and the likely practical, technical and ethical challenges it will pose for psychologists, it will be important for standards and education to be monitored, and if necessary enhanced, on a regular basis. This is where the recommended hybrid model, incorporating competency accreditation, user education, and publisher- reinforced standards, has superiority over a static and rigid legislative approach.

Testing and Assessment Practices: A Framework

VALIDITY	PROCEDURES	APPLICATIONS	REPORTS	EXAMPLES
	Professional, Opinions	**Generic**	**Complex Descriptions**	
Construct Factorial	General Personality General Ability	General Activities e.g. management, leadership	Prose Descriptions Judgments Professional Opinions	General Assessments Executive Assessments
Factorial Concurrent Predictive	General Ability General Aptitude	Defined Job Families	General Probability Predictions	Succession Planning Talent Management Career Assessments Staff Recruitment
Predictive Concurrent	Specific Aptitude	Within Workplaces	Specific Probability Predictions In – Out	Apprentice selection Military trade entry In-House Validated Tools
	Actuarial	**Specific**	**Decision Rules**	

SECTION 4: The Question of Harm

1. Nature of harm (to the public) from the use of psychological tests for occupational/organisational purposes

1.1 One of the main drivers behind the establishment of standards for tests and testing is the recognition of the need to protect clients, including job candidates, employees and organisations, from risk of harm associated with the misuse of tests. The manner in which testing could be harmful is likely to depend on the purpose of testing, the appropriateness of the tests used, the ways the tests are administered, how the tests are scored, interpreted and reported and the extent to which the test results are used to influence final decisions.

1.2 Some test uses may pose greater risks of harm than others. For example, the public may be less concerned about the risk of harm associated with the use of cognitive and personality testing for selection decision-making or identifying potential for career development amongst healthy workers, than they are about the use of intelligence and neuropsychological tests for diagnosing cognitive impairment, determining eligibility for government support, or predicting future employability following brain injury or trauma.

1.3 In the area of occupational testing, the risk of harm to individuals who undertake testing and to organisations that use test results for HR decision-making and planning is worthy of measurement, consideration and debate in Australia. There are various assumed risks to individuals and organisations, and there may also be some that will not become evident until a complaint is made and proven, or until organisations feel that testing is not giving them the results they had expected or previously experienced.

The context of testing in occupational settings differs from that of clinical settings. The misuse of tests can cost organisations when good candidates are overlooked and unsuitable candidates are selected. The "organisation" is a major stakeholder in the testing process yet the existence of harm to the organisation, through inappropriate practices, may not be obvious immediately. Nevertheless, organisational productivity and innovation are impaired by a sub-optimal approach to employee selection and development.

The following paragraphs describe the types of risks often suggested as ones to which individuals may be exposed:

1.3.1 Test Selection

- Measurement and predictive bias in some tests can lead to adverse impact when used with indigenous and non-English speaking candidates and employees, or any other demographic group that is under-represented in the normative sample. The risks are in using inappropriate tests, overlooking norming limitations and failing to consider important contextual factors.
- The failure to adequately define the criterion through job analysis can lead to inappropriate test selection (and inappropriate weighting of subsequent test scores).
- There can be an invalid assumption that a given test adds value to the criterion situation in question.

1.3.2 Test Administration (and Test Security)

- The test candidate feels coerced into completing the tests and is not given the opportunity to provide informed consent to the testing process.
- The conditions under which the tests are conducted need to be standardised, and fair, for all test candidates.

- The test administrator, or the testing system, may fail to protect the security of the testing process including test items and scoring protocols. This can lead to some test candidates gaining an unfair advantage in high stakes testing, particularly with tests of cognitive ability. Individuals can be disadvantaged because of this and other forms of cheating.
- With tests needing to be administered in a standardised fashion, a departure from this will need justification.

1.3.3 Test Interpretation

- Job applicants may be unfairly precluded from jobs for which they actually have the required skills and attributes, and future career progression opportunities may be undermined. Otherwise eligible applicants can also miss out because of competition for vacancies, which has nothing to do with testing.
- The inappropriate interpretation of test results can potentially stigmatise and label candidates and employees who are perceived to have "failed" testing and may limit their future career prospects. The self esteem of candidates can be negatively affected by a poor test result. The risks are in poor candidate management, poor candidate communications, inappropriate organisational culture, and inadequate feedback.

1.3.4 Reporting

- Test results can be reported in simple numeric and graphic forms that leave the integration and interpretation of results to the untrained client.
- Reports can be produced, either via computer expert systems or directly by the report writer, which provide a standard description of a measure and a standard interpretation which lacks integration with other test information. This leaves the reader to interpret and integrate the assessment outcomes, at times inaccurately.
- Poor written language skills can over-simplify the assessment or confuse the reader.
- Poor verbal language skills can confuse the delivery of feedback.
- Jargon, both written and spoken, leaves the recipient uninformed.
- Feedback to a test candidate with poor results can be damaging if not handled with sensitivity yet honesty.

2. Mechanisms to address harm and increase competence

2.1 The diversity of practices in test use in Australia is not for any lack of guidelines and standards. There are a number of guidelines that are internationally recognised including:

2.1.1 International Test Commission's (ITC) International Guidelines for Test Use (2000).

2.1.2 International Test Commission's (ITC) International Guidelines on Computer-Based and Internet Delivered Testing (2005).

2.1.3 European Test User Standards for test use in Work and Organizational settings (2005) (prepared by EFPA and EAWOP).

2.1.4 EFPA Review Model for the Description and Evaluation of Psychological Tests (2005).

2.1.5 APA Standards for Educational and Psychological Testing (APA, 1999).

2.1.6 ISO 10667 Assessment service delivery – Procedures and methods to assess people in work and organizational settings.

Available now for public comment, and operational in 2011, ISO 10667 will provide an additional basis on which some testing practices can be standardised internationally.

The evidence-based and measurable service standards relate to the delivery of assessments used at the individual, group and organisational levels. This International Standard aims to promote good practice and to encourage clear documentation of the working relationship between clients and service providers.

The Standard covers all stages of the employment life cycle, including vocational and career guidance, selection, coaching, talent management and succession planning, outplacement, and employee engagement surveys, to name just a few areas. The standard includes all assessment activities and not just psychological testing. Accordingly, interviews and related proprietary techniques are covered by this Standard (see International Organization of Standardization, 2010a and 2010b).

2.2 In Australia, psychologists' use of tests are also guided by the APS Code of Ethics (2007) which has been adopted by the PBA as its code of ethics. In addition, psychologists can access various APS ethical guidelines, particularly Guidelines for Psychological Assessment and the Use of Psychological Tests (2009). Both psychologists and non-psychologists work under the Privacy Act (1988) and its amendments (2000) that regulate practices in the collection, use, management and storage of personal information. Other legislation may apply across federal, state and territory jurisdictions.

2.3 The accreditation of test users in Australia is the responsibility of test publishers. Psychological tests can be purchased and used by anyone the test publisher agrees to accredit. Most test publishers and distributors, however, apply high standards of accreditation to meet their ethical and professional responsibilities. They do so to build their reputation in the industry, and to avoid legal action by dissatisfied clients, users of tests and those who undertake testing.

2.4 The Australian situation is typical of many other countries. In a review of global trends and the regulation of psychological tests in 30 countries in Africa, Europe, Asia-Pacific and the Americas (SHL, 2006), 57% of countries were found to have no statutory bodies or regulations and none had an official policy concerning internet testing. 43% of countries surveyed had no regulations or policies concerning who may administer psychological tests and 17% responded that test publishers set the accreditation requirements for their products.

2.5 The most common approaches to the maintenance of standards in test use are based either on the professional qualifications of the user or on their competence in the use of the test(s) they wish to purchase.

2.6 In the qualifications approach (as used by bodies such as the Australian Council of Education Research), tests are classified according to the professional training and experience that test users require for safe and effective test use. While some tests require the purchaser to be a registered psychologist, others can be purchased by users with educational, HR or behavioural sciences backgrounds. Yet others may require no professional qualifications.

2.7 The competency approach, on the other hand, typically involves the accreditation of test users by the national professional association (as in the UK and Europe) and/or by test publishers themselves (as in Australia). In this approach, there are varying pre-requisite

qualifications and the length and nature of training varies across publishers and tests, but is typically measured in days rather than the years required in the qualifications approach. The current assessment of competence is usually a judgement based on qualifications, years of experience as a practising psychologist and experience with the test(s). Sometimes international or local standards and guidelines are used, and these should become more common and ultimately be prescribed if Australia adopts the EFPA and ISO standards, or creates and implements something similar.

2.8 When accreditation is the sole responsibility of test publishers, it is often assumed (rightly or wrongly) that decisions about level of required competence are influenced by commercial considerations. When accreditation is the responsibility of the profession, it is often assumed that decisions about competence levels are likely to balance ethical and professional priorities but may favour the profession in any real or perceived conflict, for example with test publishers. Agreed and supervised competence and practice standards will help remove these impressions.

2.9 In many of the high volume basic occupational testing contexts, the administration and scoring of tests is a relatively routine function that does not require the higher level of skill that registered psychologists are deemed to possess. A well trained and appropriately supervised test administrator can perform this function well, regardless of psychology qualifications. The competency demands for this routine administrative function should be differentiated from the higher level of expertise required in the administration of a measure such as the WAIS in which test taker reactions and response styles require skilled observation and where more complex decisions are required by the test administrator in the scoring process. (It should be noted that a psychologist will determine the specific tests to be administered and the associated testing protocols).

2.10 If different tests require different levels of competence, there needs to be some method by which tests are classified. Despite attempts to develop test/user classification systems here and overseas, gaining agreement on the classification of tests has continued to be problematic. The manner in which the test data are used is a variable that is not readily captured in a simple register or classification of tests. Bartram (2010a) contends that there are three skills required for testing in applied settings: (a) knowledge of psychological constructs; (b) knowledge of psychometric constructs; and (c) knowledge and skills related to the use of the instrument(s). The third (c) determines the level of knowledge required in (a) and (b). This mirrors the notion that a test does not have validity in itself, but it is the inferences based upon the test use which have validity. The test needs to be considered in the light of its intended use, and the competence of the person using and interpreting the test.

3. Determining levels of competence in test use

3.1 As psychologists, we hold that best practice in advanced assessment requires a solid grounding in theory and research-based knowledge across many areas including intelligence, cognition, personality, motivation, models of job-person fit, psychometrics, ethics, and job performance, amongst others. Refer also to the PBA's expectations of the knowledge and training required for competent conduct of psychological assessments as outlined in the Consultation Paper on "Options for the protection of the public posed by the inappropriate use of psychological testing" (p5, 2010).

3.2 Furthermore, based on the reasonable assumption that misuse of tests can cause harm to individuals and bring the profession into disrepute, our APS Code of Ethics (2007) and those of many of our international counterparts specifically address the responsibilities of psychologists in the development and use of tests. Although this assumption is not

supported by the small number formal complaints, it is still instructive to make the risks clear in our training, standards and ethics as a preventive measure. The use of tests by non-psychologists or those who do not have a strong grounding in these areas challenges the presumption of the need for a significant body of prior knowledge and for in-depth understanding of a range of theoretical and research areas before undertaking any specific test competency training. Anecdotal evidence suggests that such persons often have a shallow grasp of the tests they use, of how to employ and interpret them, and the inherent limitations associated with tests and measurement. However, they do not necessarily cause harm if they stay within the limitations of their knowledge and experience. Moreover, there is also anecdotal evidence of psychologists failing to demonstrate appropriate skill in the use and interpretation of a psychological test, with the potential to cause harm if straying beyond their limitations.

3.3 From the analysis of the factors that contribute to risk of harm and the nature of those risks, the following conclusions can be drawn about the competence of test users:

3.3.1 The level of skill and knowledge required by registered psychologists is not necessary for at least some test purposes, tests and functions. As such, a blanket restriction on the use of psychological tests by non-psychologists would not address the key issue, viz. that of appropriate test user competence for the intended service. Furthermore, such a restriction would raise service costs and lead to organisations using techniques with lower utility and accuracy, with harm implications for individuals and organisations alike.

3.3.2 There is a need to determine the level of competence required for different test purposes, tests and functions to enable organisations and test users to gain maximum access to the benefits of testing, while also managing the risk of harm. Possibly due to the difficulties of measuring the risk of harm, there does not appear to be empirical research examining the outcomes of poor test usage or the use of inappropriate tests. However, research that is available and that can inform this discussion include that related to applicant perceptions of the fairness of testing and the incidence of complaints and legal action.

3.3.3 Also of concern is that many Human Resources (HR) practitioners and some psychologists using psychological tests, actually demonstrate weak knowledge of selection practices, and a consequent reluctance to use them. Carless, Rasiah and Irmer (2009) report: “Despite evidence that supports the efficacy of many human resource practices, there is a reluctance to adopt even those that have been empirically supported” (p105). Di Milia (2004) in a review of Australian HR practices reported that a number of methods with good predictive validities (based on meta-analytic research) were not widely used and that methods with unknown psychometric properties and poor predictive validity were in use.

3.3.4 The above findings are not unique to Australia given the research reported in overseas publications. They point to significant differences between published aspirational research and best practices in selection, and the apparently modest level of test knowledge of HR practitioners, despite attempts to close the gap through education, the distribution of guidelines to HR practitioners, and the reporting of evidence-based practice in HR journals and management magazines.

4. Policy options for the maintenance and enhancement of testing standards

The PBA has presented five policy options designed to protect the public.

4.1 Legislation restricting test use: full restriction (option 1) or partial restriction (option 2).

4.1.1 Until the introduction of national psychologist registration in Australia, South Australia restricted the use of tests to psychologists, but it did not enforce its laws.

4.1.2 Although not many worldwide, there are some jurisdictions in which attempts have been made to restrict the use of psychological tests by law and Section 5 provides an introduction to legislative endeavours from South Africa, Europe and the United States. It appears that these attempts at restriction have been unsuccessful.

4.2 It is unlikely that restrictions on the use of psychological tests by legislative means will find support in Australia unless the risk of harm is substantial. Nor are legislative restrictions likely to be desirable in the occupational testing context. Psychologists have worked hard to demonstrate the value of using a well structured and evidence-based testing process to assist organisations in their human resource initiatives. Organisational Psychologists have earned credibility and respect for their professionalism as test users and assessors, as evidenced by return business and a growing market.

4.3 As noted by the PBA in the consultation paper, there is elasticity in the demand for such psychological testing services. With legislated practice restrictions leading to the reduction in the supply of appropriately trained testing and assessment professionals, organisations will likely turn to sub-optimal techniques such as unstructured interviews and home grown, unstandardised tools. These inappropriate techniques, tools and practices fall outside of the scope of the practice restriction, yet will gain in popularity because of such a restriction. This has "harm" implications for individuals, organisations, communities and the economy in general.

4.4 Competency accreditation approach (option 3). The predominant model and the one that is being driven by organisational psychologists overseas (particularly in Britain and Europe) is the competency accreditation approach (Bartram, 2010b). Sections 5 and 8 provide information describing overseas initiatives, and it should be noted that in this competency accreditation approach, psychologists remain in control of defining and setting standards for all those who use psychological tests, while at the same time raising the standard of test use across the board.

4.5 Education-based approach (option 4). On its own, test user education is not a powerful tool. However, it provides a very useful element as part of an integrated approach to raising standards in test use. Being non-legislative in nature, it is relatively cheap and those individuals/organisations suitably accredited will be motivated to inform the end users of the relevant standards. Moreover, the introduction of ISO 10667 is likely to raise awareness, at least within the work and organisational assessment domain, of the need for standards and competency by service providers.

4.5.1 While not a focus of the PBA consultation paper, the PBA may well see benefit in encouraging APAC to review current standards in psychological testing and assessment in Australian universities with a view to aligning curricula to the equivalent of the top level of an Australian accreditation/certification scheme. This would help reduce duplication and cost for accreditation purposes. However, this raises the issue of whether the universities have sufficient resources and expertise to cater for the development of all the skills required for a psychologist to be a competent test specialist. While this is unlikely, as practical context-based experience is essential, an APAC-accredited program may well enable students to complete many of the necessary modules for test accreditation purposes.

4.6 Reinforcing publisher-based restrictions (option 5). International and local standards for test use aim to improve the quality of tests entering the marketplace and to protect the public from misuse. They establish best practice benchmarks to which test publishers and test users can aspire to build their reputation as providers of quality tests and quality testing services.

4.6.1 The adherence to standards is a function of the marketplace and the extent to which it values the scientific and ethical principles that guide best practice. The more educated and discerning the market becomes for rigorously developed tests and best practice testing, the greater the likely pressure on test developers, publishers and users to achieve and maintain high standards. Publishers recognise that reputation is a core element to sustaining an effective and profitable organisation. Adoption of standards such as those provided by the EFPA and ISO, and providing public education about them, will help the market to become more knowledgeable, sophisticated and demanding. For example, after testing standards were tightened in the USA in the1980s, the test manuals that were subsequently published were of much higher quality to that of their predecessors.

4.7 It may seem attractive for the industry to be held to one standard by an external regulator that demands high standards. However, it is evident from the range of tests and test practices used in Australia that, despite the availability of established and widely accepted standards for test use, the Australian market has not adopted any uniformly recognised set of best practices for test development and testing (Di Milia, 2004). While different standards and practices exist in the market, a firm regulatory approach to the industry is likely to be counterproductive and resisted; whereas, well drafted guidelines could assist Australian psychologists to manage the diversity and complexities with which they need to deal in a dynamic and multi-faceted society.

4.8 Practices restrictions fail to address the key issue of service provider competence and may lead to a false sense of competence by some psychologists. There are problems in defining and classifying psychological tests, and psychological acts, as noted in paragraph 2.10 (page 18). However, the introduction of a national ISO standard, market education and the promulgation of ethical standards can only be enhanced by the development of a test user accreditation system compatible with international initiatives. These elements, combined, should move the market towards stronger and more universal standards in theory and practice.

SECTION 5: Current Trends: International Developments and Technology Impacts

In considering the five policy options posed by the PBA, it is necessary to examine two very important contextual factors: internationalisation and technology advancement. Both factors play a very important role in contemporary and potential future developments in psychological testing.

1. Internationalisation and globalisation

1.1 Testing is a global activity and Australia is a small player within this increasingly connected community. No longer can we turn just to the USA (and Europe) for best practice. For example, Brazil has over 100,000 psychologists and, according to Professor Tom Oakland (newly elected President of Division 2 of IAAP), Brazil is leading the way in a number of areas and do not take a US-centric or Europe-centric approach to matters such as psychological testing.

1.2 The international flavour of testing and assessment is evident in not only Division 2 of the IAAP but also in the ITC (International Test Commission). Despite previous contributions of note, currently Australia plays very minor roles in both professional bodies. We are not leaders in the testing and assessment field globally despite our standing in general. The EFPA recently conducted a substantial survey (in publication) on the opinions of psychologists (from several sub disciplines) on various elements associated with psychological testing across several European countries. This will help decision makers in the implementation of future policy and training initiatives. What has happened in Australia?

1.3 Many organisations in Australia operate either internationally, or multi-nationally. Those organisations operating in more than one country may be in a position to work around local practice restrictions, particularly given modern technology. This suggests that what we implement in Australia should be compatible with overseas standards and initiatives with regard to testing. Furthermore, the proposed ISO standard 10667 means that any psychological testing regulatory framework introduced into Australia (by the PBA) should take this ISO standard into consideration.

2. Legislative restrictions on the use of psychological tests: international examples

2.1 South Africa's legislative restrictions were introduced historically to minimise adverse impact in the apartheid system (de la Harpe, 2008). Following a scope of practice notice issued by the government (R993), dated 16 September 2008, the Professional Board of Psychology issued a notice to test distributors, 10 November 2008, declaring that "it is not permissible to use unregistered persons to render the administration of tests, instruments and techniques." However, the court case of February 2010 rejected this attempt at restriction. In the judgment, the court noted that "It is unlikely that the primarily mechanical function of the recording of test results should be reserved for psychologists". (http://atp.org.za/assets/files/JUDGMENT.PDF)

2.2 Europe is mixed, with some pursuing the accreditation/certification model (e.g. UK and Germany) while others (eg. Italy) endeavour to define and restrict testing. Within occupational and organisational testing, there have been differences in opinion as to whether a test is considered psychological or competency based.

2.3 In the US, it is incumbent on organisations and test users to demonstrate that the tests they use have been selected on the basis of a job analysis, have adequate technical properties and are relevant for the use made of them (see Griggs v. Duke Power in Scroggins, Thomas & Morris, 2008). In particular, the tests used need to conform to the 80/20 rule in relation to test bias.

3. Accreditation and certification schemes in Europe and the UK

In 2009, the European Federation of Psychologists' Associations approved a pilot test of new standards for the accreditation of test users based on three-tiered competency model (Bartram, 2009a; 2009b; 2010b):

(a) Level 1: Test administration under well defined conditions [Assistant Test User]

(b) Level 2: Test use of a limited number and range of instruments in well-defined conditions [Test User]

(c) Level 3: Specialist use of tests for in-depth assessments and in providing guidance and advice to others on the use of tests [Specialist in Testing]

3.1 The European model is similar to the three-tier competency accreditation approach (Levels A, B Intermediate and Full Level B used by the British Psychological Society (BPS)). In this model, the BPS Psychological Testing Centre is responsible for setting, promoting, and maintaining standards in psychological testing. The British model is now aligning itself with the European standard. This option responds to the fact that demand for testing outstrips the availability of psychologists; much of testing is routine and does not require the level of expertise most psychologists offer; and professional associations and registration boards are limited in their powers to deal with the use of tests by non-psychologists. This set of circumstances also applies in parts of Australia.

3.2 It should also be noted that the Level 3 in the European model is considered to be equivalent to a Level 7 in the European Qualifications Framework - a master's degree equivalent in testing. At this stage occupational and educational streams are near finalisation, with plans to extend to the clinical and health domains in the next stage.

3.3 Section 8 (Addendum) provides a comprehensive overview of the UK and European models.

4. Technology impacts

There is ample evidence that technology has changed the face of psychological testing, and the pace of change is increasing. For example:

4.1 Approximately 95% of candidates (organisational focus) are tested online according to a major global test developer (SHL). Only 5% of candidates are tested via paper and pencil.

4.2 Hambleton (2010) claims that within ten years all testing, apart from perhaps specialist testing in clinical and neuropsychology areas, will be conducted online. (Professor Ron Hambleton is the author of several texts regarded as classics in modern psychometric theory).

4.3 Hattie (2010), current ITC President, has identified advancements in technology as a significant development impacting on testing and assessment.

4.4 The theme for the next ITC Conference, in Amsterdam 2012, is: "Modern Advances in Assessment: Testing and Digital Technology, Policies, and Guidelines".

4.5 Reynolds and Dickter (2010) open with “Technology has become an essential aspect of personnel selection” (p. 171). The authors continue “Indeed, technology has become an essential competency in a broader sense of I/O psychology, worthy of software engineering, and psychologists may lose the opportunity to be providers of trusted advice and consultation” (p. 171).

4.6 Advancements in technology, including computer adaptive testing (CAT) and high - fidelity item presentations (such as in video-based simulations and 'games'), are thus a crucial consideration in the adoption of a system relating to the use of psychological tests. Furthermore, the culture of the online world is not amenable to restrictive practices, and narrow restrictions may well act as a lightning rod to those wishing to bypass the authorities. The recent decision by the federal government to abandon a filtering system on the internet is an example of the difficulties of controlling internet-based activities, without incurring significant negative side effects or controversy. In discussing online testing at a symposium at SIOP 2008, in San Francisco, Nancy Tippins stated: “The train has left the station”.

SECTION 6: Conclusion

The Consultation Paper invites comments on options for protecting the public from the inappropriate use of psychological testing.

The best answer is to ensure that those using psychological tests are competent to do so.

The best way to ensure competence is to educate, train, coach, mentor and invigilate with constructive feedback.

The British Psychological Society has maintained a test user training, certification and accreditation program for the past 20 years, and it has worked well. Recently the BPS standards have been aligned to the European Federation of Psychological Associations (EFPA) 3 level model of Test User qualifications, which were based on the International Test Commission (ITC) guidelines.

While the EFPA process accredits test users in professional content and practices, another standard, ISO 10667, is promising to deliver international standards for workplace assessment delivery.

In combination, the EFPA and ISO standards and accreditation processes offer a way to adopt international best practice standards in Australia. These standards could then become the disciplined core around which occupational testing and workplace assessments could be built. Furthermore, the EFPA standards could form the basis for testing standards in educational and clinical psychology.

A system of integrated accreditations (including publisher-based and test specific) could be promulgated through public education to those actually or potentially using psychological testing, and backed up by a set of ethical guidelines and regulatory standards based on those guidelines to assist compliance.

This combined accreditation and compliance regime should contribute to harm minimisation by reinforcing existing commitments, and instilling new commitments to a culture of “no harm” that prevails among organisational psychologists.

Although there is very little documented evidence of individual harm caused by inappropriate test use by psychologists (see evidence presented and comments made at the 4th International Congress on Licensure, Certification and Credentialing in Sydney in July 2010), an integrated accreditation system will include pre-emptive training in, and assessment of, issues associated with potential harmful test practice.

While there is no reliable estimate of serious disciplinary matters by non-psychologists, the BPS has not reported difficulties among its many thousands of certified non-psychologists over the past twenty years (over 30,000 people). It must be assumed that where such people engage in aspects of psychological testing they also need training and accreditation to carry out their specified (restricted) testing activities.

The issue is not only about the low severity of reported harm, but the potential for future harm in a testing world where market forces, globalisation and technology are having a major impact on all stakeholders in the testing process. Given these factors, we recommend the use of professional training, accreditation and public education to promote quality assured test usage by qualified individuals, rather than legislating for use of tests by all psychologists (undifferentiated and unspecified as to accredited competence to use tests).

The third item in Section 8 provides a schematic of the linkages between the three core elements which form the basis of our approach: processes, people and products. Standards and guidelines act as the mechanisms linking these cornerstones. We trust that our submission provides the necessary evidence to support this approach, as we wish to ensure that the Australian public continue to be protected from harm and are served by a quality testing and assessment system that meets, and even exceeds, international standards.

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SECTION 8: Addendum: Three Attachments to the Accreditation of Test Users, the Processing of Workplace Assessments, and a Framework for Linking Processes, Test Users and Tests

First Article
The BPS is aligning its UK Model of Tester Accreditation with the European EFPA model. This outline of the structure of the new qualifications is an article that appeared in BPS *Assessment & Development Matters Vol 1 No.4 Winter 2009*

Revision of the UK Test User standards and alignment with changes in Europe: Part 2 – Structure of the new qualifications
Dave Bartram
In this issue of ADM, I build on the article from Issue No. 2 (Summer 2009) and describe the structure for the new qualifications. In the next issues I will set out the timetable for changes and the arrangements that are being made to ensure current certified test users will be able to transition easily to the new system. Anyone who has a current certificate (either one of the occupational testing certificates or the educational CCET) will be automatically eligible to be grand-parented into the new scheme. If you are currently on the Register of Competence in Psychological Testing (RCPT) you will not need to do anything. If you are not, you will need to get onto the Register. None of these changes will take place before the middle of 2010.
Relating the EFPA and UK models

THE BRITISH PSYCHOLOGICAL SOCIETY team working on introducing the revised Level A/B standards faced a complex task. They needed to ensure that the Society could develop a range of qualifications in diverse settings (i.e. work, health and education) and also ensure that what was produced would meet any forthcoming European standard and accreditation scheme.

As described earlier (see ADM Vol. 1 No. 2), the approach has been to use the EFPA model as a reference point and then develop specifications of qualifications that fit our current needs from that. The 2005 revision of the Level A/B standards have been mapped to the EFPA standard and restructured as a set of Modules, comparable to the current Level A/B units. The main difference is that the Modules have now been classified as those that are knowledge-based and those that are practice-based. Knowledge-based Modules are further divided into those concerned mainly with psychometrics and those that focus on the psychological knowledge that underpins competent test use.

It is envisaged that knowledge-based Modules will be assessed using tests of knowledge (i.e. some form of 'exam') while practice-based Modules will be assessed using observation of performance in actual or simulated assessment situations, together with candidate reports, log books and other evidence of competence to practice.

The following outline descriptions of the new qualifications indicate how they align with current Level A/B qualifications, including the current Occupational Test Administration certificate. For 'Level 2' there will be a much more flexible structure of core knowledge Modules with optional practice-based ones. While this structure will incorporate the current Level A and Intermediate Level B qualifications, it will also provide opportunities for a greater variety of options in the future.

Outline descriptions of the new qualifications

Level 1: Test Administration (Occupational)
The Level 1 Test Administration qualification represents an update to the current Occupational Test Administration Certificate. The main change is the incorporation of a wider range of modes of assessment (including internet-based assessment). The content has also been expanded to cover additions from CCET. However, for the time being, there is no provision for offering a separate qualification in educational test administration (though this is under consideration).

There are three Modules. One is knowledge based and the other two are practice based.

LEVEL 1 Modules:
PSYCHOLOGICAL KNOWLEDGE
Module 1.101, 1.102: Introduction to testing (the details of this vary depending on the context: Educational or Occupational).
PRACTITIONER SKILLS
Module 1.103–1.105: Administering tests to one or more candidates – Educational and Occupational have different sub-modules. Module 1.106: Maintaining security and confidentiality of the test materials and the test data.

Level 2: Test use (Educational)
This corresponds to the current CCET qualification. Within the new structure people are able to develop a 'profile' of competence at Level 2. The CCET represents one particular profile at this level. In the future, people could further develop their profile by gaining Practitioner Skill qualifications in relation to additional types of instrument, as currently happens for the Occupational qualifications.

Level 2 builds on Level 1 and any Level 2 qualification needs to include all relevant Level 1 Modules. Level 2 does not cover test choice generally but focuses on choice within the range of tests for which competence has been demonstrated. The ability to provide more general advice on test choice would require Level 3 qualification.

'New' CCET:
In addition to Level 1 Modules, this will require:
LEVEL 2 Modules:
PSYCHOLOGICAL KNOWLEDGE
Module 2.202: Introduction to Testing: Educational.
PSYCHOMETRICS
Module 2.206: The basic principles of scaling and standardisation.
Module 2.207: Basic principles of norm-referenced interpretation.
Module 2.208: Test Theory – Classical Test Theory and Reliability.
Module 2.211: Validity and Utility.

PRACTITIONER SKILLS These Modules are to be applied to the range of instruments that the assessee has competence in.
Module 2.213: Deciding when psychological tests should or should not be used as part of an assessment process.
Module 2.214: Making appropriate use of test results and providing accurate written and oral feedback to clients and candidates.
Module 2.217: Providing written feedback.

Level 2: Test use (Occupational)
This corresponds to the current Occupational Level A and Level B Intermediate qualifications. Within the new structure the A/B distinction is replaced by one in which people are able to develop a 'profile' of competence at Level 2. For example, such a profile might include ability testing, and two or three different personality instruments. People develop their profile by gaining qualification in Practitioner Skill modules in relation to additional instruments.

Level 2 requires that competence relating to Test Use is assessed in relation to specific instruments (ability or personality). For the purposes of European Accreditation, Level 2 will need to cover all the Modules listed below with a profile that includes both ability and personality assessment instruments. However, the BPS will continue to recognise separate 'Level A' and Level B' type qualifications. The psychometrics modules are common to Level A and B, but in the new structure it will be possible to do a Level B without a Level A qualification – see below.

Level 2 does not cover test choice generally but focuses on choice within the range of tests for which competence has been demonstrated. The ability to provide more general advice on test choice would require Level 3 qualification.

'New' Occupational Level A:
In addition to Level 1 Modules, this will require:
Module 2.201 (Psychological knowledge relating to ability and aptitude).
All of the Level 2 Psychometrics Modules (2.206–2.210) if these have not already been covered through Level B.
All the Level 2 Practitioner Modules (2.212–2.217) in the context of ability testing.

'New' Intermediate Level B:
In addition to Level 1 Modules, this will require:
Modules 2.203, 2.204 and 2.205 (Psychological Knowledge relating to personality).
All of the Level 2 Psychometrics Modules (2.206–2.210) if these have not already been covered through Level A.
All the Level 2 Practitioner Modules (2.212–2.217) in the context of personality assessment (based on a minimum of one instrument).

Level B Intermediate Plus
There is no longer a need to define 'substantively different' instruments for Level 2 as the old 'Level B Intermediate Plus' certificate will disappear. This is replaced with a profile of instruments (where proof of competence has been obtained from a verified assessor) and the individual's practice log (where there can be claims made through self-development). Competence in additional instruments can be added to a person's Level 2 profile as and when they obtain the necessary verified assessments (covering 2.215, 2.216 and 2.217).

LEVEL 2 Modules:
PSYCHOLOGICAL KNOWLEDGE
Module 2.201: Ability and aptitude.
Module 2.203: Personality.
Module 2.204: Personality assessment.
Module 2.205: Influences on personality.
PSYCHOMETRICS
Module 2.206: The basic principles of scaling and standardisation.
Module 2.207: Basic principles of norm-referenced interpretation.
Module 2.208: Test Theory – Classical Test Theory and Reliability.
Module 2.209: Test Theory – Item Response Theory [optional].
Module 2.210: Validity and Utility.

PRACTITIONER SKILLS
These Modules are to be applied to the range of instruments that the assessee has competence in.
Module 2.212: Identifying the assessment need.
Module 2.213: Deciding when psychological tests should or should not be used as part of an assessment process.
Module 2.214: Making appropriate use of test results and providing accurate written and oral feedback to clients and candidates.
Module 2.215: Issues associated with Interpretation – Instrument specific. Module 2.216: Providing oral feedback.
Module 2.217: Providing written feedback.

Test Use Modules especially 2.15, 2.16 and 2.17 require evidence of competence in interpretation and providing reports and feedback to clients and candidates in both client-oriented, assessment contexts (where the prime reason for the assessment is to provide the client or client organisation with information about the candidate) and candidate-oriented assessment contexts (where the prime reason for the assessment is to provide the candidate with information about him or herself).

LEVEL 3: Advanced test use
The proposed Level 3 qualification is intended to relate closely to the current 'Full Level B'.

The Level 3 Modules cover the knowledge and understanding deemed necessary for test users to make more informed and in-depth choices between instruments as to their suitability for various purposes. The focus in Module 3.301 on test construction assumes a level of knowledge sufficient to make an informed evaluation of an instrument on the
basis of reviews and information presented in its technical manual.

Modules 3.302, 3.303 and 3.304 extend the coverage of reliability, validity and utility issues dealt with in Level 2 and – as with all the Level 3 Modules – assumes an underlying competence at Level 2.

Level 3 builds on Level 2. Requirements for Level 3 include completion of Level 2 qualification in both the areas of ability and personality and a profile that includes practitioner competence in two or more personality instruments. These should cover a range of types of construction and use.

LEVEL 3 Modules:
PSYCHOMETRICS
Module 3.301: Approaches to testing and test construction.
Module 3.302: Reliability issues. Module 3.303: Validity issues.
Module 3.304: Utility issues.
PSYCHOLOGICAL KNOWLEDGE
Module 3.305: Computer-based assessment and computer-generated reports.
Module 3.306: Identifying the assessment needs.
Module 3.307: When and how to use tests.

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Second Article
An International ISO standard has been created to guide the Service Delivery of all forms of Workplace Assessment. This article outlining the scope of ISO 10667 is an ISO 10667 Briefing Note by Dave Bartram, Chair of the BSI Shadow Committee

ISO 10667 Briefing Note
D Bartram, Chair BSI Shadow Committee.

The aim of the ISO's 'Psychological Assessment' Project Committee (PC230) was to develop a service delivery standard relating to assessment in work and organizational settings. The resulting ISO 10667 is presented in two Parts. One Part covers the role of the client in an assessment process and the other covers the role of the assessment service provider. The standard is intended to be applicable in any work or organizational assessment setting regardless of whether the service provider is internal to an organization or external and regardless of whether the people who are assessed are the clients (as in career guidance) or people who are being assessed for a client (as in the assessment of people for job selection).
The focus is on quality in the provision and delivery of assessment services. The standard does not set out to provide technical quality standards for assessment methods or procedures, or to define the specific competencies or qualifications required by users of such methods and procedures. What is does assert is the need for any methods and procedures that are used to be soundly evidence-based and to be technically fit for purpose. It also requires participants in the delivery of assessments to be competent in the use of those assessments and not act outside of or beyond their areas of competence.

Attached are the consultation documents for both Parts (ISO/DIS 10667-1 and ISO/DIS 10667-2) which are available for comment by the public for around three months; your comments on them will be particularly welcomed. After the public comment period, the BSI Shadow Committee will review the comments received to provide a UK response to the consultation for the final PC230 meeting, scheduled for December 2010.

We expect the Standard to be published mid-2011.

Who are the audiences for the standard?
The standard is intended for those involved in assessment of personnel in or for organizations. While these are the prime end users, it should also be of relevance to others involved in the contracting of assessment services in work and organizational settings – both clients and contractors.

The key end users are those people who make ultimate use of the information collected during an assessment (e.g. those making hiring decisions, such as line managers). There is also an Annex to the standard relating to the rights and responsibilities of those who are being assessed.

Others for whom the standard is relevant, but who may not be directly involved in the delivery of an assessment include:

• Policy makers (HR, Unions, external policy etc) • Distributors of assessment procedures • Developers of assessment procedures

What is the function of the standard?
The standard focuses on assessment service delivery and provides practical guidance for both clients and service providers regarding the nature and quality of the service the former should expect to receive from the latter. The standard is in two Parts to make clear the need for both client and provider to adhere to their Part of the standard if quality is to be ensured. In most assessment procedures, there is a need for the client to take on certain responsibilities if the provider is to be able to discharge their side of the process to the standard required. The division also makes it easier to use the Part specifying requirements for the service provider as the basis for certification of the provider, if that is desired. It was appreciated that such certification needs to be carried out without it being dependent upon the behaviour of a client. If certification is to be undertaken, either assessment service providers can 'self-certify' by checking that they follow the standard and using this fact in their marketing, although it would have more credibility if the certification is provided by an independent body following an audit process. Within the UK, bodies like the British Psychological Society could decide to provide that sort of function.

Structure of the Standard
The standard refers to the choice, integration, implementation and evaluation of assessment procedures; the interpretation of the assessment results and subsequent reports; the required competencies of individuals taking part in the assessment process; and fairness and ethical principles involved in the process.

The standard covers assessments carried out for one or more of the following categories of work-related purposes made by or affecting individuals, groups or organizations:

- employment-related decisions;
- career-related decisions;
- group decisions;
- organization decisions.

Assessment is divided into three stages:

1. Pre-assessment procedures, including identification of assessment needs and specification of the assessment services agreement.
2. Assessment delivery, including: planning, ensuring the competence of those participating in delivery, dealing with security, managing assessment-participant rights and data privacy, informing assessment-participants about the procedures and obtaining any necessary consents, conducting the assessment, dealing with results, specifying and proving feedback.
3. The standard also encourages clients and service providers to carry out a post-assessment review.

How will it be used?
The Standard can be used in a number of ways. At the very least it provides a reference document for clients and service providers to consult as a guide to good practice. Both parties can also use it to audit their own processes and procedures and to make changes where necessary to ensure better quality in assessment. As mentioned above, the service provider may wish to obtain certification against the relevant Part of the standard.
The standard will also provide client organizations with a basis on which to contract with service providers. Public sector organizations in particular may wish to use compliance with ISO 10667 as a requirement for any service provider contracts.

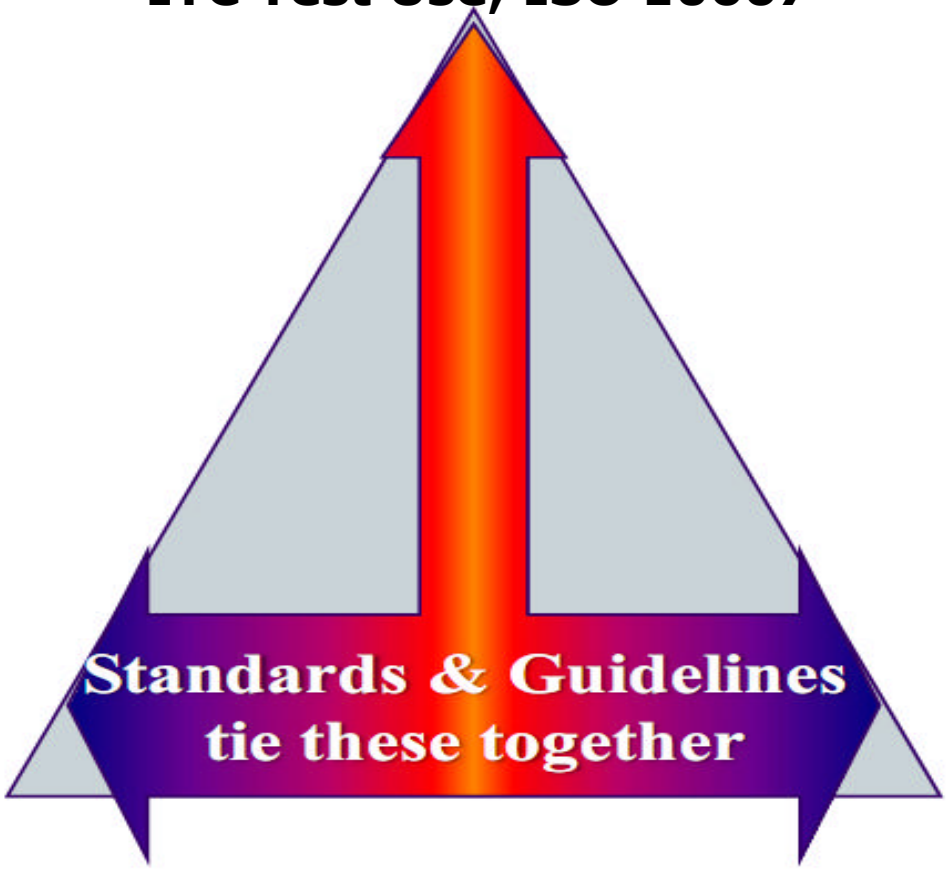
ISO 10667 is by definition an international standard. As such it provides the first opportunity for multinational organizations to put in place a consistent quality standard for their use of assessment across countries. Whether for internal benchmarking or for external contracting, this should help to move us towards a much higher degree of consistency and fairness in global assessment programmes.

The degree to which the final standard can help improve the quality of assessment in work and organizational settings, which would be to the benefit of all concerned, will depend on the standard being reasonable and practical in terms of the demands it makes on both service providers and clients. Your input to the consultation process is a key part of ensuring the final standard will be successful in achieving its objectives.

Standards link process, people and products

***The Assessment Process*:**
ITC Test Use; ISO 10667

***The test user*:**
ITC Test Use;
BPS Level A/B;
EFPA-EAWOP standards etc



Adapted from D Bartram 2010 (permission granted)

***The tests(s) used*:**
BPS [EFPA] Test Reviews;
COTAN, Buros;
ITC Test Adaptation & CBT guidelines