




MEMORANDUM

DATE	February 12, 2021
TO	Rebecca Mitchell, Executive Officer Naturopathic Medicine Committee
FROM	 Tracy Montez, Ph.D., Chief Division of Programs and Policy Review
SUBJECT	Naturopathic Physicians Licensing Examination (NPLEX)

The Naturopathic Medicine Committee (Committee) has been receiving inquiries about the use of online/remote proctoring for the Naturopathic Physicians Licensing Examination (NPLEX). The Committee has asked the Department of Consumer Affairs (DCA) Office of Professional Examination Services (OPES) for guidance on this test administration option.

The COVID-19 pandemic has caused DCA entities to reevaluate how their services are provided, including how their licensing examinations are administered. DCA and OPES recognize that online or remote proctoring is intended to make examinations more accessible and to reduce candidate anxiety, especially during the pandemic.

However, DCA and OPES strongly recommend that programs carefully evaluate online or remote proctoring using psychometric guidelines and standards, particularly the *Standards for Educational and Psychological Testing (Standards)*.¹ DCA's examination programs must comply with California Business and Professions Code (BPC) section 139, which is based on the *Standards*.

Although initial research indicates that online or remote proctoring results in pass rates consistent with traditionally proctored examinations, OPES cautions that this test delivery system may have unintended consequences. These consequences may include new opportunities for candidate misconduct and examination subversion, as well as potential legal issues.²

¹ American Educational Research Association, American Psychological Association, and National Council on Measurement in Education. (2014). *Standards for Educational and Psychological Testing*. Washington, DC: American Educational Research Association.

Before high-stakes licensing examinations are implemented using online or remote proctoring, many factors need to be further researched and evaluated. These factors include:

- Type of examination (e.g., format of items).
- Length of examination (i.e., number of questions/administration time).
- Number of breaks allowed, if any.
- Materials or equipment used.
- Ratio of candidates to proctors.
 - Proctor training; managing the remote environment.
- Fairness and Technology requirements.
 - Use of artificial intelligence; automated pass/fail decision-making.
- Security analytics and security measures implemented.
- Measures to address cameras/recording of examinations.
- Impact of potential examination subversion on program item banks and on the safety of consumers.
 - Robustness of item banks; ability to create new forms independent of compromised test items; delays in testing as a result of examination subversion.
- Legal issues related to candidate privacy.
 - Policies addressing purpose and sharing of personal information; use of video surveillance; retention of test results and video.

Considering the above psychometric, legal, and security factors, which are addressed by both BPC section 139 and the *Standards*, we do not think that online or remote proctoring should be used for the NPLEX at this time.

If you have questions, please contact me at Tracy.montez@dca.ca.gov.

Cc: Carrie Holmes, Deputy Director, Board and Bureau Relations
Heidi Lincer, Ph.D., Chief, Office of Professional Examination Service

² Association of Test Publishers' Security Committee. (April 7, 2020). *Privacy Considerations in Online/Remote Proctoring*. Washington, DC: Association of Test Publishers.