



April 26, 2021

To Whom it May Concern:

The media coverage of Bill 35 has travelled across the country to a concerned audience in British Columbia. The Bill would allow for Level C cognitive assessment instruments to be administered and interpreted by teachers without a graduate degree in psychology. As a result, the Executive of the *British Columbia Association of School Psychologists* (BCASP) is writing this letter to strongly discourage provisions of Bill 35 from becoming acceptable practice.

In several communications, Minister Cardy has referenced that aspects of Bill 35 (specifically the administration of cognitive assessments) have been built on a model used in the British Columbia Education System, as well as other provinces including Newfoundland. To clarify, teachers in British Columbia (even in specialized positions) do not administer Level C assessments. The British Columbia Ministry of Education has clearly specified in their *Special Education Policy Manual* that Psychoeducational Assessments (and administration of Level C instruments) are carried out only by qualified professionals: Certified School Psychologists or Registered Psychologists. To work as a School Psychologist in British Columbia you must, at minimum, hold a Masters' degree in School Psychology (or equivalent) with graduate coursework in specific areas, a 1200 hour supervised Internship, and be a member of BCASP. Furthermore, a PhD is the current requirement to be a Registered Psychologist with the College. While some Psychologists in British Columbia may also hold Teaching Certificates, it is graduate level degrees in Psychology and alignment with a profession body, that provides the ability to practice and conduct assessments.

School Psychologists have an expertise and specialized skill set that goes well beyond the administration of Level C instruments. This skill set is crucial in ensuring that comprehensive assessments can provide high value and useful information to the school and family, rather than simply test scores that could be misinterpreted by someone with inadequate training and experience. This could have detrimental effects, leading to educational decisions that could have real life consequences and harm for students. It is essential to understand that an assessment is more than the administration of a single test, even if it is the Wechsler Intelligence Scale for Children (WISC). Psychologists are trained to integrate multiple sources of data to support or rebuke hypothesis (including test scores). Understanding whether the performance with test scores align with classroom and home environments not only helps to build validity, but more accurately identifies what supports may work best.

It appears that it took some time to get to this critical tipping point in New Brunswick. We would encourage you to repeal Bill 35, reduce the potential harm that could occur to students, and redirect your energy towards creating a sustainable model for the delivery of psychology services in schools by qualified professionals. There is an obligation to ensure there are appropriate quality standards of practice as well as professional ethics followed in the delivery of psychological services. The various stakeholders (government, teachers, psychologists, support staff, administrators, and parents) have a common goal: the learning and well-being of all students. We strongly encourage you and your government to withdraw from making a decision that could have negative consequences for children and their families.



The British Columbia Association of School Psychologists supports the positions of the New Brunswick Association of School Psychologists and the College of Psychologists of New Brunswick against Bill 35. The BCASP Executive is questioning how Bill 35 made it this far and hope there is still time for better policy to be developed, for the benefit of current and future students in New Brunswick.

Sincerely,

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cc

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