

March 25, 2021

To The Honourable Minister Cardy,

The Clinical Psychology Program at the University of New Brunswick (UNB) trains graduate students in the ethical practice of psychology to prepare them for clinical practice as Licensed Psychologists. As members of the Clinical Program Committee, we, the undersigned, are responsible for this training. Given our key contribution to the training of Clinical Psychologists, we are intimately familiar with the comprehensive education required to correctly and effectively use psychological tests.

We write to add our voice to the already substantial professional and public opposition to Bill 35. The specific sections of concern are:

11.1(1) A teacher who holds a master's degree approved by the Minister and completes the training approved by the Minister may administer a test prescribed by regulation, score the test and interpret and apply the results of the test, for the purpose of developing a personalized learning plan for a pupil.

11.1(2) This section and the regulations made under paragraph 57(1)(o.1) shall supersede all other provisions in the Psychologists Act and any regulation made under that Act.

25.1 For the purposes of section 11.1 of the Act, the test that may be administered is the Wechsler Intelligence Scale for Children (WISC).

We fully support the concerns with these sections of Bill 35 that have been clearly articulated by the College of Psychologists of New Brunswick, the New Brunswick Association of School Psychologists, and the Learning Disabilities Association of New Brunswick. As organizations that represent experts in psychological assessment and New Brunswickers for whom psychological assessment is essential, their positions on Bill 35 should be heeded.

While we appreciate the motive to, and critical importance of, reducing the time children wait for a psychoeducational assessment, we have grave concerns that this legislation will allow for individuals with inadequate training to administer complex psychological tests. Such a situation presents inherent risk that (a) the cause of a child's challenges will be incorrectly identified, (b) the child will be matched with the incorrect intervention, (c) inadequate intervention will have negative impacts on the child's development, and (d) the child will find themselves requiring substantially more support from the province's education and health systems later in their life, when their difficulties are exacerbated. These consequences mean that this legislation will likely not accomplish what it sets out to do.

Training to become competent in the ethical and appropriate use of psychological and psychoeducational tests is a time intensive process and involves so much more than learning to give and interpret select tests.

A comprehensive understanding of child development, mental health, cognitive functioning, and psychometric test evaluation is needed. This training starts at the undergraduate level with a 4-year BA or BSc Honours degree in Psychology. This means students already begin our PhD program with a core understanding of human behaviour. Subsequently, in an additional 5+ years in our Clinical Psychology PhD program, students are trained to achieve competency in Assessment and Evaluation as per the standards outlined by the Canadian Psychological Association (CPA). In addition to standard training in the scientific and professional ethics and standards of the practice of psychology, CPA declares that competency in Assessment and Evaluation requires core knowledge in:

- i. **Individual differences and human development.** Our students gain this knowledge through graduate courses in Lifespan Psychopathology, Cognitive Science, Social Psychology, Brain and Behaviour, and Developmental Psychology.
- ii. **Research design and test construction.** Our students gain expertise in this area through three required graduate courses in Statistics and Design, a Master's and PhD Research Apprenticeship, a PhD dissertation, and graduate courses in Assessment Skills with Children and Adolescents and Assessment Skills with Adults (which include coverage of how to evaluate the psychometric quality of tests).
- iii. **Psychological assessment.** Our students gain this expertise through graduate courses and practicum training. In the classroom, students take courses in Assessment Skills with Children and Adolescents, Assessment Skills with Adults, Therapy Skills with Adults and Therapy Skills with Children (where they learn interviewing skills used in assessment), and Evidence-Based Practice. They also complete >1000 hours of practicum training supervised by Licensed Psychologists in our on-campus training clinic and in community-based clinics/hospitals. In their final year of the program, they complete an additional 1600 hours of practicum training during a full year, supervised Predoctoral Clinical Internship.
- iv. **How the diversity of human characteristics and conditions impacts psychological practice.** This education is integrated into each of our courses and additional required workshops (e.g., Working with First Nations Individuals).

The reason students receive such comprehensive training is because psychological test scores, like those coming from the WISC-V, do not mean anything on their own. In fact, it is dangerous to interpret them in isolation and without proper skills. Courses in the biological, cognitive, and social bases of behaviour help our students understand how these factors influence development and learning and how they could interact to influence scores on tests. The depth and breadth of training received by our students teaches them how to integrate information from multiple sources (e.g., child, family, teacher, physician) and formats (e.g., interviews, rating scales, observation, psychological tests, medical assessments) and how to interpret that information when there is conflicting data from these sources. Training in psychometrics and advanced

statistics teaches our students to evaluate the reliability and validity of the tests they choose to administer and to understand and evaluate the benefits and limitations of the different scores produced by these tests. Comprehensive training in psychopathology allows students to correctly identify the mental health problems that often co-occur with learning challenges. To omit an assessment of these mental health challenges in a child referred for learning problems is unethical because it is ultimately potentially dangerous to the child.

It is evident, then, that teachers – even those with a Master’s degree and additional training approved by the Minister – will not have the training required to provide them with the knowledge and skills needed to use psychological tests correctly and effectively. We have great respect for the work of teachers and all that they already do with their existing tools and knowledge to help address the learning needs of New Brunswick’s children. We teach our students how to work collaboratively with teachers to identify children who need assessment, to respect teachers as important informants as part of these assessments, and to trust teachers to have the ability and knowledge to implement effective interventions in the classroom.

We strongly oppose Bill 35 and encourage the Department of Education to collaborate with all stakeholders to find a solution to the waiting lists for psychoeducational assessments that allows psychologists and teachers to work within their scope of practice. We would welcome the opportunity to be a part of these conversations to discuss how our training program can help increase the number of psychologists working in the province.

Sincerely,

Sandra Byers, PhD, L.Psych
Barbara D’Entremont, PhD, L.Psych
Mary Ann Campbell, PhD, L.Psych
Diane LaChapelle, PhD, L.Psych
Janine Olthuis, PhD, L.Psych
Meghan Richards, PhD, L.Psych
Scott Ronis, PhD, L.Psych
Heather Sears, PhD, L.Psych

CC Premier Blaine Higgs
Hon. Trevor Holder
Hon. Dorothy Shephard
Deputy Minister George Daley
Deputy Minister Marcel Lavoie
Members of the Legislative Assembly

