



**The Association of**  
*Chief Psychologists with Ontario School Boards*

To Whom it may concern:

We are writing from the Association of Chief Psychologists with Ontario School Boards to indicate our concerns about Bill 35 and to urge you to vote against Bill 35 that provides teachers with the responsibility of doing psychological and cognitive testing with students.

Without the appropriate regulatory body to oversee professionals who usually administer and interpret psychological assessments, teachers and boards are left at risk. This is an unethical, unfair position for the teachers. Decisions are made through IPRCs based on the results of assessments.

To protect boards and the public from teachers who are unregulated in terms of conducting psychological cognitive assessments, this Bill must be voted down.

To protect boards from parents who may be concerned about unregulated professionals providing cognitive assessment information to IPRCs that results in significant placement and programming decisions about their child, this Bill must be voted down.

Assessing skills of students from diverse backgrounds is a particular priority of psychologists, who strive to use the most appropriate, culturally responsive assessment tools and the best careful analysis of those results. Psychologists have received training not just on test administration but on test interpretation. The overall score on a specific test does not provide an accurate measure of an individual's cognitive ability, when interpreted in isolation. Psychologists are trained to determine the most appropriate measure of cognitive ability for various diverse populations. This is an equity and social justice issue. To ensure equity for our racialized, minority and disadvantaged populations, this Bill must be voted down.

The particular test that is used to evaluate a child's intellectual ability profile is not the WISC in many situations, and other tests, published by companies other than Pearson, may be required. Psychologists have the training to determine the most appropriate instrument, not teachers newly trained.

Psychology staff have a great deal more to offer than simply finding a score to describe the student. The purpose of psychological assessment is to help the teacher better understand the child, including their cognitive learning profile, adaptive, behavioural, socio-emotional and mental health functioning.

Psychology staff have the specialized training to address the needs of diverse populations of children. Teachers administering and interpreting tests puts the teachers and boards at risk for mis-identification as they are not able to provide a diagnosis.

Psychologists are able to interpret the test within the context of a child's overall psychological, adaptive and social-emotional development and cultural/linguistic background and as such are able to provide differential diagnoses. This is something that teachers are not able to provide as doing so would be beyond their scope of practice.

We suggest that the Bill be voted down and that alternative solutions be considered with psychologists to address the needs of the students in New Brunswick.



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