



Canadian Council of Professional Psychology Programs
Conseil canadien des programmes de psychologie professionnelle

March 25, 2021

To The Honourable Minister Cardy,

On behalf of the Executive and the membership of the Canadian Council of Professional Psychology Programs, I am writing to add our voice to the already expressed professional and public opposition to Bill 35. The Canadian Council of Professional Psychology Programs represents over 86 graduate university-based psychology programs and psychology internship settings in Canada that train professional psychologists such as clinical psychologists, school psychologists, counselling psychologists, and clinical neuropsychologists, as well as other branches of professional psychology.

We fully appreciate and agree with the critical importance of providing timely access to psychoeducational assessment for New Brunswick's school children, which is the motive underlying Bill 35. However, in trying to find solutions to this complex and important issue, we encourage you to consider the issues raised by the College of Psychologists of New Brunswick (CPNB) and our member organization, the University of New Brunswick (UNB) Psychology Department. Specifically, areas of concern include:

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 believe this legislation will put the public at risk due to the inappropriate use of psychological tests. We are particularly concerned this legislation will allow individuals to administer, score, and interpret psychological tests without the breadth of knowledge needed to incorporate the broader cognitive, biological, social, developmental, and cultural bases of behaviour into a conceptualization of the student's learning experiences. Moreover, competent psychoeducational assessment requires clinical skills that go well beyond administering a single test or interpreting a test score. Competent psychoeducational assessment requires skills in clinical interviewing, motivating test takers to perform their best, managing mental health and behavioural issues (e.g., anxiety, oppositional behaviour, inattention) that could impact test performance, assessing the validity of the test results, and integrating data from multiple sources (test data, rating scales,

observations, medical assessment, and information obtained from interviews with the student, their families, and their teachers).

As the national organization representing academic and internship programs focused on training professional psychologists, we can attest to the breadth and depth of training received by professional psychologists prior to their licensure. *In New Brunswick specifically, this training includes a four-year undergraduate honours degree in psychology and 5+ years of graduate school. Beyond the hours spent in the classroom, our professional trainees, obtain a minimum of 2600 hours of practicum and pre-doctoral internship training in which they are closely supervised in the implementation of their knowledge and clinical skills with clients.* As part of the licensing process with CPNB, psychologists are supervised for an additional year (approximately 1600 hours) before they are licensed to practice independently. The additional training being suggested for resource teachers in Bill 35 (from the publisher of the test, which stands to gain financially from this arrangement) does not come close to offering this level of education, training, or oversight and thus places the public at risk from the inappropriate use of psychological tests.

Inappropriate diagnoses can impact a child's life forever with potentially devastating consequences. *However, we also believe we can solve this critical and important issue together.* Therefore, we strongly encourage the Department of Education to partner with the psychological training community and CPNB to generate effective solutions for New Brunswick's children – solutions that enable all of the relevant professionals (including teachers, counsellors, psychologists, social workers, etc.) to work together given we all share the same commitment and passion to care for New Brunswick's families.

Please feel free to reach out to us directly Lesley.lutes@ubc.ca or diane.lachapelle@unb.ca if you have questions or would like to talk further about how we can assist you in this incredibly important issue. Families in New Brunswick have suffered more than most in recent years. Please know we are here to help.

Sincerely,

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