

## *Newfoundland and Labrador Psychology Board*

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May 10, 2021

The Hon. Dominic Cardy

Minister of Education and Early Childhood Development

Government of New Brunswick

Place 2000, PO Box 6000

Fredericton, NB E3B 5H1

Minister Cardy

We are writing on behalf of the Association of Psychology Newfoundland and Labrador (APNL) and the Newfoundland and Labrador Psychology Board (NLPB) to express our concerns and opposition to the proposed Bill 35 (Section 11). Our goal, in writing this letter, is not to protect the self-interests of Psychologists, but rather to protect the learning, social and emotional needs of the students of your province. We fully endorse the essential need for early and timely access to assessment, when needed, to help address learning challenges in children. However, it is important to ensure that these children receive the appropriate assessments, delivered by suitably trained professionals, which can help lead to diagnoses (when needed), and guidance to the school staff as to how to best deliver evidence-based interventions.

The assessment process is complex and various individuals may need to be involved. Classroom teachers are frequently the first professionals who may see some signs of learning struggles in their students. They then reach out to parents and various school team members to alert them of their concerns. Depending on the concerns, the child may then be seen by a number of different health and/or education professionals including a Psychologist. Based on concerns expressed by any of these team members, additional more formal assessment may be required.

Psychometric assessment is a specialized skill which requires advanced graduate level training to understand the psychometric properties of tests, an understanding of a standardized administration and training in the strict administration protocols. Standardized administration is essential to ensure that the scores obtained on an assessment are accurate, and not a reflection of administrator error or bias. In some settings test administration is conducted by a Psychometrist (typically an individual with a Master's Degree in Psychology with multiple graduate courses in assessment) under the supervision of a

Registered Psychologist. Psychometrists are unlicensed and do NOT provide test interpretation or make diagnoses.

Psychological tests have various levels of restrictions on them, primarily based on the interpretation skills required and potential diagnostic implications of the results, or repercussions if results are incorrectly interpreted. These are frequently referred to as "Level C" tests and include the WISC-V. A Psychologist who purchases a level C assessment tool is ethically responsible to ensure it is used appropriately, and is not subject to misuse, misinterpretation or use by unqualified individuals. Pearson Canada lists the following qualifications in order to purchase these tests:

*Tests with a C qualification require a high level of expertise in test interpretation, and can be purchased by individuals with:*

*A doctorate degree in psychology, education, or closely related field with formal training in the ethical administration, scoring and interpretation of clinical assessments related to the intended use of the assessment, **OR** Licensure or certification by a provincial College of Psychology to practice in your province in a field related to the purchase, **OR** Certification by or full membership in a professional organization such as College of Psychology, the Canadian Psychological Association (CPA), the Canadian Register of Health Service Providers in Psychology (CRHSPP), the Canadian Association of School Psychologists (CASP) or other North American organizations such as the American Psychological Association (APA) that requires training and experience in the relevant area of assessment.*

Following test administration is the far more complex issue of test interpretation and differential diagnosis. In the case of school-age children, these skills require advanced training and knowledge in child development, child psychopathology, learning and behavioural disorders, psychometrics, advanced statistics, test selection, as well as a thorough understanding of test interpretation. Psychological assessment interpretation is far more complex than score X = diagnosis Y and requires a thorough understanding of how to integrate the results of multiple assessment batteries, behavioural observations, and other background information.

As an example, a child in Grade 1 may be struggling with their learning. Potential explanations could include a learning disorder, a language disorder, a delay in phonics skills due to lack of exposure needed for skills development, an intellectual disability, ADHD, ASD, OCD, fine motor delays, anxiety, depression, trauma, family circumstances, lack of sleep, or any number of additional factors. Assessment of this child by someone with limited training and understanding in assessment, only using a limited number of tools risks either missing a potential diagnosis or making an incorrect diagnosis. These errors can have lifelong implications on the child's educational, social, and emotional development.

We understand that the CPNB has proposed a number of strategies to assist with the recruitment and retention of Psychologists within the New Brunswick school system. We support them fully in these initiatives as we all agree that the goal is early access to high quality assessment and supports when they are needed. One possible solution would be to introduce the use of specially trained Masters level specialist teachers, under the supervision of your Registered Psychologists, to become part of the student support team. Master's trained teachers in a Psychometrist role, under the supervision of a Psychologist could complete the testing, while test interpretation and diagnosis become the responsibility of the Psychologist. This would allow for more timely access using an appropriately qualified team.

This suggestion is similar to the model is use here in NL. Guidance Counsellors, who have completed the M.Ed in Counselling Psychology receive two graduate courses in assessment, one in assessment foundations (ED6707) and one in the administration of the WISC-5 (ED6709). ED6709 is taught by a Registered Psychologist, practice administrations are reviewed by the Psychologist to ensure proper standardized administration, and students are told explicitly that they are being trained in test administration, NOT interpretation and diagnosis. Students are then required to complete a practicum placement where they may complete assessments under supervision. Historically assessments completed by Guidance Counsellors indicated eligibility for school board exceptionality classifications, NOT diagnoses. Current practice has shifted somewhat and has created significant issues for many families – for example, an assessment completed by a Guidance Counsellor is not eligible for the Disability Tax Credit nor for student support services in post-secondary institutions across the country.

Psychology regulatory boards across Canada are primarily concerned with protection of the Public from the actions of Psychologists. If a Psychologist selects inappropriate testing measures, makes inaccurate conclusions while interpreting testing data, misses a diagnosis or misdiagnoses a child, the family have a source of recourse against the Psychologist (including potential disciplinary and/or legal action). Psychologists carry malpractice insurance and are required to participate in regular quality assurance activities. **If an assessment is conducted by a non-licensed individual, there is no recourse available to a family, other than potential legal action against the employer (school board).**

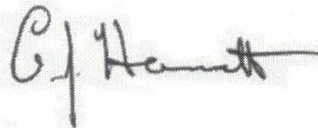
The children and families in New Brunswick deserve access to early, appropriate, skilled assessments that include Registered Psychologists as part of the multi-disciplinary school support team. Rapid access to poor quality assessments by unqualified unlicensed individuals risks legal action again the Department of Education, and more significantly, risks the long-term learning and mental health of your students.



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Cc: The Hon Blaine Higgs, Premier of New Brunswick

Roger Melanson, Leader of the Official Opposition

David Coon, MLA, Leader of the Green Party of New Brunswick

Kris Austin, MLA, Leader of the People's Alliance of New Brunswick

Mandy McLean, Executive Director CPNB