

May 21, 2021

**The Hon. Dominic Cardy**  
**Minister of Education and Early Childhood Development**  
**Government of New Brunswick**  
**Place 2000, P. O. Box 6000**  
**Fredericton, NB. E3B 5H1**

Honourable Minister Cardy,

Following close attention to the media coverage of Bill 35, the Association of Psychologists of Quebec (APQ) is writing to join our voice to the standing of the New Brunswick Association of School Psychologists and the College of Psychologists of New Brunswick in their call for a repeal of Bill 35. The following sections are of particular concern:

- **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 upersede 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).*

While we understand the motive behind Bill 35 and agree with the critical importance of providing judicious access to psychoeducational assessment for children in the New Brunswick school system, we strongly encourage you to consider alternate avenues. The issues raised by the CPNB as well as other psychological associations throughout the country are important to the well-being, development and academic success of New Brunswick pupils.

Psychologists develop the clinical judgment and aptitudes necessary to interpret assessment results and conduct differential diagnosis through a decade of post-secondary training, internships, and supervised practice in order to obtain their license. The assessment of psychological and cognitive functioning is one that specific to the field of practice and expertise of psychologists. It consists of evaluating affects, aptitudes, attitudes, cognitions, tastes, interests, motivations, resources, etc., in order to establish a portrait of the person being evaluated, make recommendations and/or determine an intervention plan. The assessment of psychological and academic functioning is not based on a predetermined assessment framework and does not rely on the administration of a single test (e.g., WISC), which is never interpreted in isolation and can be misinterpreted without adequate training. Instead, the clinical impressions and recommendations are based on the individual referral question, their history, biological, psychological, social and cultural factors, the use of various psychometric tests and questionnaires as appropriate, the individual's resources and strengths, as well as previous diagnoses and treatments.

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Such an assessment may lead to the conclusion of the presence of a disability or disorder and can also help determine multiple factors that may be associated with the person's difficulties. Teachers, even those who hold a master's degree, do not have the expertise and breadth of knowledge necessary to appropriately administer and interpret cognitive tools such as the WISC. We encourage your ministry to repeal the concerning sections, as they undermine the knowledge and expertise of school psychologists in their work.

The New Brunswick Association of School Psychologists (NBASP) has listed numerous short- and long-term solutions to react to the dearth of psychological services within schools and ensure timely psychoeducational assessments of New Brunswick children and we strongly support their recommendations. Teachers and psychologists do invaluable work in the education of our children, but their roles are not interchangeable. Long-term efforts should be made in relation to the attraction and retention of school psychologists in NB schools.

Sincerely,

**Jenilee-Sarah Napoleon, M.Sc., Ph.D. candidate**

Administrator of the Association of Psychologists of Quebec

**Charles Roy, M.Ps., psychologist**

President of the Association of Psychologists of Quebec