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ATTN: Honourable Mr. Blaine Higgs

Chancery Place

P. O. Box 6000

Fredericton, NB

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Dear Hon. Blaine Higgs,

We are writing to express our serious concerns with Bill 35, currently before the legislative assembly of New Brunswick for consideration. The British Columbia Psychological Association represents over 750 registered psychologists in the province of B.C. We are very concerned about the potential negative mental health impacts this Bill will have on students and their families.

The proposed Bill would allow for Level C cognitive assessment instruments to be administered and interpreted by teachers without a graduate degree in psychology. We strongly believe this legislation will put the public at risk due to the inappropriate use of psychological tests. In particular, we are concerned that this legislation will allow psychological tests to be administered, scored and interpreted by individuals who are insufficiently trained to administer such tests and lack the knowledge required to incorporate the broader cognitive, biological, social, developmental, and cultural bases of behaviour into a conceptualization of the student's learning experiences. Competent psychoeducational assessment requires clinical skills that go well beyond what could be covered in a 1000 hour training.

In addition, New Brunswick's Minister of Education and Early Childhood Development, Dominic Cardy, has stated that many aspects of Bill 35 have been built off a model used in British Columbia. To be clear, teachers in British Columbia (even in specialized positions) do not administer Level C assessments. These tests are administered by Registered Psychologists or School Psychologists, who hold a graduate degree in School Psychology (or equivalent) and have undergone additional training and supervision. While some Psychologists may hold a teaching certificate, it is their training in psychology and clinical assessment that qualifies them to administer Level C cognitive assessments.

We believe that there are alternative solutions to achieve meaningful reductions to the waitlist and improve access and quality of services for students. These changes can impact short-, medium- and long-term access. Many solutions have been proposed by the College of Psychologists of New Brunswick (such as increasing the supply of psychologists to NB schools and expanding accredited internships) and we fully support each solution.

Our resistance to Bill 35 is solely regarding the impact on children and their families. We support the government in addressing the waitlist but cannot allow the solution to be at the detriment of the child. This is a public protection issue.

We sincerely hope that the New Brunswick government will oppose this Bill, to reduce the harm it may cause your students. We believe that key stakeholders and the government can work together to create a solution that will not only decrease waitlists in a way that is economically favourable and sustainable, but will also ensure high-quality, comprehensive psychoeducational assessment for students.

Sincerely,



Alexina Picard
Executive Director
B.C. Psychological Association



Dr. David Mensink, Ph.D, R.Psych
President
B.C. Psychological Association