

April 20, 2017

Dr. Alice Collins,
Chair, Premier's Task Force on Educational Outcomes

Dear Dr. Collins

Thank you for the opportunity to provide input on behalf of the Association of Psychology Newfoundland and Labrador (APNL) to the Premier's Task Force on Educational Outcomes. We commend you for the hard work and dedication of your committee towards improving the educational outcomes for students in our province. APNL would like to support your work to reduce the barriers and challenges students and their families face, particularly as it relates to mental health and wellbeing.

From our first-hand experience as psychologists practicing in Newfoundland and Labrador, APNL has identified three primary areas of concern within our current educational system where psychology can support better educational outcomes.

1. There is a significant need within our education system for Registered Psychologists trained and able to provide clinical assessments, diagnoses and interventions.

A current challenge in our province is that the Guidance Counsellors working in our school systems are without the training and skills to undertake psychological assessment and diagnosis of children and youth; competencies core to the training and scope of psychologists' practice. Further, it is our understanding that graduates from the M.Ed. in Counselling Psychology at MUN will no longer be eligible for licensure as psychologists from the Newfoundland and Labrador Psychology Board. This may mean that while graduates of the program may be able to offer counselling to students, they will be neither trained nor licensed to undertake psychodiagnostic assessments or delivery of evidence-based psychological treatments.

The valid and reliable detection of many cognitive and behavioural disorders demands the administration and interpretation of psychological tests, a competence unique to psychologists and one that is sorely needed within our school systems in Newfoundland and Labrador. The understanding, administration and interpretation of psychological tests requires many hours of graduate psychology coursework, as well as supervised practical work both pre and post-licensure as a psychologist.

A thorough understanding of statistics and psychometrics (test construction) is required to interpret psychological tests accurately. To interpret various types of scores, it is necessary to have an understanding of how they are derived, what they mean and how they compare to other types of

statistical measures. In addition, the examiner can review the technical merits of selected instruments.

In the hands of inexperienced, unsupervised, or unqualified individuals, test administration and assessment result in inaccurate interpretation of assessment data, misdiagnosis and inappropriate, ineffective and possibly harmful interventions. For example, there can be serious and significant consequences for a child mistakenly determined to be of borderline intelligence when in fact he or she had a learning disability or attentional disorder – consequences which could easily lead to negative school experiences, closed doors and missed opportunities all because the child's actual problem was incorrectly identified and improperly accommodated.

Individuals who conduct psychological assessments may find themselves required to defend or explain their assessment in a court of law. School personnel will want to ensure that psychological assessments are carried out by, or under the supervision of a licensed psychologist for two reasons. First, school boards want to ensure that, in offering a service or intervention, it is of the highest possible quality and best meets the needs of the child. Second, school boards will have exposure and liability if a service, carried out under their aegis, is not done in accordance with regulated professional standards, by a provider licensed to render the service. Individuals performing tasks of a psychological nature who are not licensed or qualified to do so, may find themselves in an indefensible position.

Finally, children with severe and persistent mental or cognitive disorders may be eligible for government programs which give tax relief for their parents. Such programs (e.g. the Disability Tax Credit) permit only physicians and psychologists to attest the child's condition in support of the application. Furthermore, students pursuing post-secondary education outside of the province require diagnosis and documentation from a Registered Psychologist in order to access appropriate accommodations and supports.

2. There is a need to provide accurate, early assessment and diagnosis within the school system.

Currently, children are not typically eligible for assessment before the age of 8 years old. A six-year-old with learning problems that go undiagnosed for two years faces even more challenges brought about by the lack of early and appropriate intervention. These include school failure, compromised self esteem and social difficulties. While our school system does offer services to children younger than 8 years old, without an adequate assessment and diagnosis, it is not matched to their needs. The intervention needs of a child with an attention disorder, a learning disorder, a history of trauma and abuse or an anxiety disorder vary greatly, yet all may present with similar symptoms. While the Response to Intervention Model (RTI) can be helpful for some children, particularly those with early gaps or delays in their learning, it does a great disservice to many others by delivering inappropriate interventions to children whose conditions have not been accurately diagnosed.

3. Psychologists working with the education system need access to current, up-to-date resources and assessment tools to meet ethical standards and provide quality care to their students.

CPA Practice Guidelines for Providers of Psychological Services require psychologists to be as up-to-date as possible on the latest evidence-based practices, including the most up-to-date versions of psychological tests. The American Psychological Association's Code of Ethics specifically states that "Psychologists do not base their assessment or intervention decisions or recommendations on data or test results that are outdated for the current purpose." The latest version of psychological tests typically improve upon limitations of old tests and have updated validity and reliability information that is important for accuracy of a psychological assessment. Old tests rely on old normative data which may no longer be relevant to the knowledge or skill base of today's children. Employing the most current tests, based on current norms of test performance, enables the psychologist to base his or her diagnosis on the best information possible. An accurate diagnosis, as mentioned earlier, is necessary to match the right intervention to the right person and problem. While updating test libraries can be costly, the costs they offset when children are better matched to the interventions they need can be considerable.

The APNL would like to offer its assistance to you and your Committee as you complete your important work. I will follow up this letter with a phone call in the hopes of setting up a meeting with you to discuss our recommendations and how the psychologists of Newfoundland and Labrador might be of further assistance.

Sincerely,



Dr. Janine Hubbard

President, APNL