



Decoding Dyslexia New Brunswick
PO Box 30046 Prospect Plaza
Fredericton, NB
E3B0H8

March 23, 2021

The Honourable Dominic Cardy,
Minister of Education
c/o Constituency Office
250 King Street
Fredericton, NB E3B 2T9

Re: Bill 35 Changes to the Education Act

Dear Minister Cardy,

Decoding Dyslexia New Brunswick (DDNB) was formed in August 2020 by families dedicated to improving awareness and increasing educational resources for students with dyslexia and related language-based learning disabilities within our province.

As parents of children with learning disabilities, our families have been directly affected by the shortage of public and private psychologists, the resulting wait times, and the expenses associated with private assessment. However, we are concerned about the proposed changes to the Education Act set out in Bill 35, particularly:

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 understand the qualifications to administer the Wechsler Intelligence Scale for Children (WISC) have been set at the most stringent level, Class C, by Pearson Canada Assessment Inc.

"Tests with a C qualification require a high level of expertise in test interpretation..." Source: Pearson Canada Qualification Levels <https://www.pearsonclinical.ca/en/ordering/qualification-levels.html> and WISC Classification <https://www.pearsonclinical.ca/en/products/product-master.html/item-84>



We are concerned about how the province will ensure sufficient qualifications are held or the ethical administration, scoring and interpretation of assessments if the proposed amendment passes legislation. ***Specifically, how will the Department of Early Education and Childhood Development ensure the protection of our children in the administration of an assessment tool that is traditionally administered by a licensed psychologist within the context of a battery of tests to inform a diagnosis of dyslexia or a related learning disability?***

Further, the proposed amendment indicates its purpose is to develop personalized learning plans (PLP) for students. We have experienced the disheartening and frustrating path to secure PLPs for our children. We can tell you that there is resistance to, and lack of support for, the implementation of Universal and Justified Accommodations within our schools. The former, as you know, should be introduced upon the identification of any learning struggle as the very premise of Universal Accommodations is that they are available to all students and do not require the development of a PLP.

“Universal accommodations are those strategies, technologies or adjustments that enable a student to reach prescribed outcomes and can be used as needed. Universal accommodations do not necessitate a PLP or prior approval for provincial assessments.” Source: Accommodations for Instruction and Assessment, Province of New Brunswick

We offer this point because insufficient access to formal assessments is only part of the problem. ***The greater systemic issues facing our learners are the: (1) under-identification of struggling learners; (2) inconsistent introduction of Universal Accommodations, (3) difficulty accessing early, evidenced-based assessments that inform the introduction of Justified Accommodations through the development of a personalized learning plan, (4) lack of explicit, systematic, and cumulative reading instruction that benefits all struggling readers, and is required for dyslexic learners.***

Strong delivery of Structured Literacy and Universal Accommodations in the regular classroom, paired with effective evidence-based interventions for those who require them, would **prevent** most reading problems. Prioritizing this approach could reduce the need for psycho-educational assessments, thus resolving the same issue the proposed amendments to the Education Act aim to address.

We urge you to:

- ***Empower classroom and resource teachers with the knowledge and evidence-based tools needed to***
 - ***effectively screen all students for weaknesses associated with dyslexia beginning in kindergarten (or sooner),***
 - ***effectively teach reading to all students, and***
 - ***monitor progress so that all students receive equitable and effective reading instruction and timely interventions to ensure their success.***
- ***Work with community partners, experts, and stakeholders (including learners and their families) to address the needs of vulnerable students.***



We appreciate your promotion of the science of reading and remain advocates for its adoption in our New Brunswick curriculum. We agree that formal assessment is critical for the diagnosis of dyslexia and other related learning disabilities, but are concerned about ethical, safe application of any assessment tools. We are willing and able to contribute to your decision-making to ensure all New Brunswick students learn to read.

Sincerely,

A simple, elegant handwritten signature in black ink, consisting of a single continuous stroke that forms a loop and ends with a horizontal tail.

Aimée Foreman
Chair,
Decoding Dyslexia New Brunswick

A handwritten signature in black ink, featuring a stylized 'M' followed by a cursive 'L' and 'e'.

Marla Lesage
Secretary-Treasurer,
Decoding Dyslexia New Brunswick

cc:
Premier Blaine Higgs
Deputy Minister George Daley
Deputy Minister Marcel Lavoie