



The Association of  
*Chief Psychologists with Ontario School Boards*

Section on Psychology in Education  
ONTARIO PSYCHOLOGICAL  
ASSOCIATION

February 23, 2018

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## **Response to the Ontario Auditor General's 2017 Report regarding psychological services and wait times**

The Association of Chief Psychologists with Ontario School Boards (ACPOSB) and the Ontario Psychological Association's Section on Psychology in Education (OPA SecPE) appreciate the Auditor General's 2017 Report drawing attention to the important issues concerning psychological services in school boards. We would like to contribute to a better understanding of the issues raised, and to addressing these issues more effectively.

The Association of Chief Psychologists with Ontario School Boards represents the leaders of psychological services departments in school boards across Ontario, currently with close to 50 members who represent over 600 psychology professionals in school boards. The Ontario Psychological Association's Section on Psychology in Education membership consists of psychologists and psychological associates<sup>1</sup> involved in psychological services for school age children in Ontario. Both organizations are deeply invested in improving psychological services for Ontario's children and youth, and appreciate the opportunity to provide this input. Below is the Executive Summary of the report findings and the response/input provided. A more detailed explanation of all the issues follows.

### **EXECUTIVE SUMMARY**

#### **A. Findings from the Report**

##### **Auditor General's 2017 Report: Chapter 3, 3.12**

##### **4.5 Special Education – Inequitable Resource Allocations and Long Wait Times for Services<sup>2</sup> (page 641)**

The main findings of the report are the following: long wait times; increased number of external assessments; varying wait times between schools in the same board.

#### **B. Student needs addressed by School Psychology**

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<sup>1</sup> psychologists and psychological associates will be at times referred to as "psychologists" for simplicity

<sup>2</sup> The report is based on collecting data from four Southern Ontario school boards

Both research findings and Ministry directions support a model of school psychology that is beyond the “refer, assess, identify” model, which is outdated and does not meet the needs of students and schools in the 21<sup>st</sup> century.

In section C, OPA SecPE and ACPOSB would like to add the relevant information about the role of psychologists in our publicly funded schools.

### **C. The Role of School Psychology**

As described in the *Professional Practice Guidelines for School Psychologists in Ontario*<sup>3</sup>, and based on principles in *Learning for All*<sup>4</sup>, current psychological service provision is based on a pyramidal, multi-tiered prevention/intervention model, whereby the intensity of supports and the levels of intervention are provided based on need, and includes a range of different services.

The Auditor General’s report seems to rely on a “refer, assess, identify” model of school psychology, which is an outdated model. The report implies that

- conducting assessments is the main focus of school psychology
- waiting for a psychological assessment is a barrier for students with special education needs to get formal support (i.e. assessment is required for IPRC)
- psychological assessments are primarily used for identification purposes.

**In the section below we would like to provide additional information to increase the clarity of this issue, including the nature of the “barrier” and the factors behind it.**

#### **1. Accessibility of psychological services**

Access to psychological services varies across district school boards. However, school psychology services are **the only publicly funded psychology services** that are widely available to children and youth in Ontario that can address their educational needs, including psychological/psycho-educational assessments.

#### **2. Supply-demand imbalance in psychology services**

The current supply of school psychology services is not able to keep up with demand for many reasons, including:

- a. Expectations for the range of school psychology services have expanded and are aligned with the changes in education practice in Ontario.
- b. Services are governed by professional regulations (College of Psychologists of Ontario) to ensure high quality services
- c. There is a need for comprehensive assessments that aim to describe the child’s learning profile, help the teacher better understand the child, and provide meaningful educational recommendations.
- d. Requests for services are triaged, and significant severe needs will be addressed as priorities (e.g., those presenting a threat to the student’s own or others’ safety). Because of this triaging, “wait-times” will vary among students, and the “average wait time” can be deceptive.
- e. Inconsistent staffing and support for psychological services by boards.
- f. Demands from outside of Education (by medical doctors, child protection, post-secondary institutions, etc.)

#### **3. Change in roles**

As indicated earlier, and in alignment with the Ministry of Education’s expectations, school psychologists are involved in a broad range of services to support students. However, the paradigm shift from the old model of school psychology (primarily focused on assessment for identification) to the current model including early intervention hasn’t happened in all school boards and schools, resulting in the inappropriate use of psychology resources.

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<sup>3</sup> *Professional Practice Guidelines for School Psychologists in Ontario* (Ontario Psychological Association, 2013)

<sup>4</sup>

## **D. Conclusion**

The report by the Auditor General recommended:

"To ensure all special-needs assessments are completed in a timely and equitable manner, we recommend that school boards:

- establish reasonable timelines for completing psychological, and speech and language assessments;
- have access to all assessments wait lists at the board level and use this information to reassign assessments to specialists who have smaller workloads;
- implement a plan to clear backlogs; and
- track use of external assessments to better gauge demand." (page 643)

In order to be able follow these recommendations, the underlying issues need to be addressed:

- Consistent staffing levels for school psychologists across Ontario will be necessary to ensure fair and equitable access to psychological services to all Ontario students. By ensuring consistent and equitable staffing levels for other professionals (such as guidance and social work staff), effective collaboration between professionals can significantly contribute to the Ministry of Education goals of student well-being, as well as "supporting students in successful education and career/life planning."
- More community based psychological services are needed to address the need for psychological services in the areas of health (including psychological assessments asked for by medical doctors); justice, university and colleges, child protection, disability support, that school psychologists are currently being asked to provide. If other appropriate ministries and community services could support these needs, this would ease the demand for school psychology services, currently funded only by Education.
- In order to address the province-wide shortage of qualified school psychologists, there is a need to purposefully and systematically support graduate training programs (via supporting practicum and residency placements).
- Consolidating the culture of using in-class and in-school early intervention in schools before a full psychological assessment is requested would help target students for full assessment more accurately. In the Ministry of Education's Policy and Program Memorandum No 8 (2014), there are guidelines regarding pre-assessment intervention, assessment and intervention, including the Individual Education Plan, which are applicable for all exceptionalities. With this approach, students truly in need for a Tier 3 intervention would be referred for assessment.

## **FULL RESPONSE**

### **To the Ontario Auditor General's 2017 Report regarding psychological services and wait times**

The Association of Chief Psychologists with Ontario School Boards (ACPOSB) and the Ontario Psychological Association's Section on Psychology in Education (OPA SecPE) appreciate the Auditor General's 2017 Report drawing attention to the important issues concerning psychological services in school boards. We would like to contribute to a better understanding of the issues raised, and to addressing these issues more effectively.

The Association of Chief Psychologists with Ontario School Boards represents the leaders of psychological services departments in school boards across Ontario, currently with close to 50 members who represent over 600 psychology professionals in school boards. The Ontario Psychological Association's Section on Psychology in Education membership consists of psychologists and psychological associates<sup>5</sup> involved in psychological services for school age children in Ontario. Both organizations are deeply invested in improving psychological services for Ontario's children and youth, and appreciate the opportunity to provide this input. Below is the brief summary of the report findings and the response/input provided.

## **A. Findings from the Report**

### **Auditor General's 2017 Report: Chapter 3, 3.12**

#### **4.5 Special Education – Inequitable Resource Allocations and Long Wait Times for Services<sup>6</sup> (page 641)**

"All four boards we visited had lists for special needs students waiting to be assessed or served by professionals in the areas of psychology or speech and language. At all four boards, special-needs students are usually offered preliminary services in the suspected area of need by the classroom teacher in consultation with the specialists before they are formally assessed by the specialists. However, the assessments by specialists provide insight into a student's unique needs that allows the school board to devise a long-term plan for services that best meet the student's needs." (page 641)

The main findings of the report are the following:

1. About a quarter to a third of the students on the wait lists had been waiting for a psychological assessment for over a year, some for longer. "These assessments are used by each board's Identification, Placement and Review Committee (IPRC), which determines whether a student meets the criteria of a specific exceptionality, and recommends the appropriate placement for receiving special-needs supports and services." (page 641)
2. In some cases the number of external psychological assessments increased, possibly "due to parents paying for a private assessment of their child in order to avoid wait times or being able to have the assessment done by a specialist of their choosing." (page 642)
3. "The wait times for specialist assessments can vary significantly based on the school the student attends." (page 643)

## **B. Student needs addressed by School Psychology**

### **1. Research concerning student needs**

Research studies in psychology have consistently indicated that, in addition to academic learning, students' social-emotional well-being and competencies (such as self-awareness and self-understanding, empathy, social relationship skills, etc.), as well as a growth (vs fixed) mindset are critical for mental health and life success, and need to be built and developed from an early age. With a strong sense of who they are, and the understanding that they can always develop and improve their skills (growth mindset), students are better able to be engaged, to successfully plan for their future.

Psychological services in schools have an important role in cultivating students' social-emotional learning, self-awareness/self-understanding and mental health. This is achieved not only by providing comprehensive student assessments, but also by consulting and collaborating with teachers, guidance counsellors and social workers, and by helping teachers understand and support students with varying needs, including those with special education needs.

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<sup>5</sup> psychologists and psychological associates will be at times referred to as "psychologists" for simplicity

<sup>6</sup> The report is based on collecting data from four Southern Ontario school boards

## **2. Ministry of Education response to student needs**

A number of Ministry of Education documents, resources and initiatives are focused on fostering student well-being and mental health<sup>7</sup>. Among the four domains of well-being (cognitive, emotional, social, physical), the importance of skills such as critical thinking, problem solving, cognitive flexibility, understanding, managing and coping with emotions, self-awareness, social relationships, communications) are emphasized. School psychologists are highly qualified mental health professionals, and have an important role to play in all levels of mental health and well-being supports, from promotion to prevention and intervention, at the individual, classroom, school and system level.

The Ministry of Education document<sup>8</sup>, *Creating Pathways to Success*, puts students in the centre of their own learning, viewing them as the architects of their own lives. Students are encouraged to discover who they are, explore opportunities, pursue their passions, and design personal pathways to success." .... "It takes a whole education community – teachers, administrators, students, and parents – as well as the broader community to support students in successful education and career/life planning." (page 7) The program goals described in this document include the goal to "ensure that students develop the knowledge and skills they need to make informed education and career/life choices...." (page 8)

In order to achieve the goals stated in this document, as well as to ensure overall positive mental health for students (as described in *Open Minds, Healthy Minds* and *Ontario's Well-Being Strategy for Education*), such collaboration is critical. When teachers, guidance counsellors, special education teachers, and psychologists operate in separate silos, it is not only inefficient, but also counterproductive, as students may receive inconsistent messages from the different professionals involved.

In order to facilitate this collaboration, it is important to have a better understanding of the role these professionals play in supporting students.

**OPA SecPE and ACPOSB would like to add the following information about the role of psychologists in our publicly funded schools.**

### **C. The Role of School Psychology**

"School psychologists are integral and important members of the student services team, as well as of the district's organizational structure. School psychologists provide a wide variety of educational and mental health services to school districts, school staff, students, and their families. It is important to note that school psychologists, along with their multidisciplinary team colleagues, can be instrumental in providing services to ensure the best outcome for children and youth facing barriers in learning." (2013 OPA<sup>9</sup>)

Based on principles as described in *Learning for All* (2013, Ministry of Education), psychological service provision is based on a pyramidal, multi-tiered prevention/intervention model, whereby the intensity of supports and the levels of intervention are provided based on need.

The Auditor General's report implies that:

- conducting assessments is the only focus of school psychology. In fact, students, families and teachers are supported by school psychologists in many other ways.

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<sup>7</sup> *Open Minds, Healthy Minds* (2013) , *Ontario's Well-Being Strategy for Education* (2016), Ministry of Education

<sup>8</sup> *Creating pathways to success: An education and career/life planning program for Ontario schools* (2013) Ministry of Education

<sup>9</sup> *Professional Practice Guidelines for School Psychologists in Ontario* (Ontario Psychological Association, 2013)

- Waiting for a psychological assessment is a barrier for students with special education needs to get formal support (i.e. and assessment is required for IPRC). It is important to note that a) not all students referred for a psychological assessment have special needs, and b) the assessment does not in all cases lead to an IPRC identification. As well, addressing student needs through good teaching for the student is not denied pending an assessment. The Ministry in its documentation indicates that an Individual Educational Plan, as well as Differentiated Instruction, can occur regardless of whether formal assessment or IPRC has taken place.
- access to psychological assessment is primarily used for identification purposes, while, in fact, the purpose of a psychological assessment is to help in better understanding the child's learning profile so that teaching strategies can best be devised. Recommendations from the psychological assessment need to be tied to the development of the IEP.

**In the section below we would like to provide additional information to increase the clarity of this issue, including the nature of the “barrier” and the factors behind it.**

### **1. Accessibility of psychological services**

Access to psychological services varies across district school boards, and does have varying limitations (such as geography: large distances to be covered in northern boards, shortage of psychologists especially in French boards). However, school psychology services are **practically the only publicly funded psychology services** that are widely available to children and youth in Ontario and that can address their educational needs, including psychological/psycho-educational assessments. With the shortages in community based mental health services, school psychologists are often the go-to service providers for these types of services in schools as well. Therefore, school psychology services have critical importance. It is important to note that no other ministry besides the Ministry of Education funds services for psychological assessment on a meaningful scale. However, school psychologists are often expected to address these student needs-related to health, university and college assessments, justice, corrections, child protection, etc., which inevitably leads to a capacity problem. Parents receiving services from community based psychology practitioners in private practice often aims to address this gap.

Currently about 50 district school boards identify that they have psychological services through the listing of the Association of Chief Psychologists With Ontario School Boards. Based on data collected, it is estimated that about 40 thousand school age children and youth receive some form of support through psychological services every year.

### **2. Supply-demand imbalance in psychology services**

The current supply of school psychology services is not able to keep up with demand for many reasons, including:

#### **a. Expectations**

Expectations for the range of school psychology services have expanded and are aligned with the changes in education practice in Ontario. Instead of the main “gatekeeper/ assessor” role psychologists had in the past, psychology professionals in schools now are expected to provide prevention services and support at the classroom level; early intervention to students at risk; as well as intervention to support students with significant needs (assessment, diagnosis, intervention, mental health counselling). At the same time, the number of psychology professionals in schools has not increased, and the demand for assessments has not decreased, - and, in fact, may have increased. (For example, many school boards require a psychological assessment for the identification of certain categories of exceptionality.)

#### **b. Professional regulations to ensure high quality services**

Psychoeducational/psychological assessments can only be completed by (or under the supervision of) **a Psychologist or Psychological Associate, registered by the College of Psychologists of Ontario**. There is a province-wide chronic shortage of such professionals. Newly hired professionals who replace retirees are most often new to the profession and require (as per College of Psychologists

regulations) a year or longer professional supervision by senior psychologists, which is time consuming and impacts on the time required for each assessment completed.

In Ontario, diagnosis is a controlled act, and the only school-based professionals who can make diagnoses (such as Learning Disability, Attention Deficit Hyperactivity Disorder, Autism Spectrum Disorder, Mood Disorder, etc.) are registered psychologists/psychological associates. It is also important to recognize that these diagnoses are based on comprehensive evaluations of a student's functioning, often including standardized testing of intellectual, academic and adaptive functioning. Such measures are an integral part of psychological assessment, and imperative to ensure an accurate and meaningful diagnosis.

**c. Need for comprehensive assessments**

In addition to providing information about the strengths and needs of the student to support IPRC decision-making, the purpose of the psychoeducational/ psychological assessment is to describe the child's learning profile, help the teacher better understand the child and provide meaningful educational recommendations. This information is a critical component of the student's self-understanding, contributing to the quest "Who am I?" and "Who do I want to become?" as described in *Creating Pathways to Success*. Therefore, **assessments consist of thorough and in-depth collection and interpretation of test results and other data**. Such an assessment may take 20 to 30 hours (including feedback sessions and report-writing). Again, it is important to recognize that this current practice is different from previous practice, when school psychology had more of a gatekeeping role; that is, when the main purpose of the assessment was to establish whether or not the student met identification criteria for an exceptionality.

**d. Wait-times for assessments**

Wait- times vary by the severity of student need, as well as board by board. Requests for services are triaged, and significant severe needs will be addressed as priorities (e.g., those presenting a threat to the student's own or others' safety). Because of this triaging, wait-times will vary among students, and the average wait time can be deceptive. In addition, "wait lists" are handled and created differently by boards, and due to the different methods used, these are often not comparable.

**e. Inconsistent staffing and support by boards**

School boards are not mandated to have Psychological Services, and the availability of trained psychologists, as well as psychologist-to-student ratio, varies greatly among boards and depends on the individual board's priorities at any given time. In most cases, this ratio is far below the recommended 1:1000 students ratio indicated in the *Professional Practice Guidelines for School Psychologists in Ontario*<sup>10</sup>. In the 2017 People for Education survey, "61 % of elementary principals and 50% of secondary principals report insufficient access to psychologists to meet the needs of their students."<sup>11</sup> Even with the increasing demand for more psychology services, boards may opt to use their funding to increase other types of services (e.g. social work, speech-language pathology, occupational therapy, etc.). When boards' priorities change, psychology services often become targets of cutbacks, either in personnel, or in other supports (i.e. funds for test equipment, technology, case management systems, etc.), or both. This inevitably has an impact on efficiency and productivity of psychology staff.

**f. Demands from outside of Education**

Currently, school psychologists often receive requests by community services to conduct a psychological assessment on a student, for reasons outside of educational programming. For example,

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<sup>10</sup> Ontario Psychological Association, 2013

<sup>11</sup> People for Education – Annual report 2017, page 6

occasionally a medical doctor will request that the school psychologist provide an assessment to aid the medical practitioner in their diagnosis. As well, assessments are often requested by Developmental Services Ontario to support after-school services. Assessments are also sometimes asked to facilitate interventions in a Day Treatment program. School psychologists are often asked to provide psychological assessments to help with the provision of accommodations in college or university. All of these outside requests put a burden on the school psychologist, who is responsible for providing assessments for the students to help with programming while they are in the boards.

### 3. Change in roles

As indicated earlier, and in alignment with the Ministry of Education's expectations (as described in *Learning for All*), in addition to conducting assessments, school psychologists are involved in a broad range of services to support students:

- Primary (Tier 1) level: broad scale universal consultative, preventative and proactive interventions are provided to entire schools or classrooms, such as whole class programs (e.g. building resilience, healthy relationships and positive mental health); and the provision of professional development and training to school staff, students and parents on topics such as mental health, special education needs, etc.
- Secondary (Tier 2) level: targeted consultation, prevention and intervention services are provided to at-risk groups or individuals, such as the provision of needs-based group intervention (e.g., anxiety reduction, anger management, social skills development), consultation to teachers and school staff, crisis response, and involvement in threat and risk assessment teams.
- Tertiary (Tier 3) level: intensive intervention and remediation efforts are tailored to individuals with significant needs. These may include psychological assessment and assessment based counselling (self-understanding, self-awareness, self-advocacy); behavioural assessment and programming, and development of positive behaviour support plans and safety plans; provision of individual counselling/intervention, etc.

In some school boards and in many schools, the paradigm shift from the past to current model of school psychology to include pre-assessment early intervention hasn't happened. Through the joint Ministry of Education-OPA "*Student assessment project*" (2007-09), boards established successful promising practices for pre-assessment early intervention, using psychological assessments as next steps only when these early interventions were not effective. However, this approach did not survive in many schools, where an assessment is often required before any help/intervention can be provided to a student.

Some other obstacles to implementing successful early interventions:

- a. More capacity building is required for regular classroom teachers to provide pre-assessment accommodations and support students in the regular class.
- b. Early intervention programs for struggling students need to be more readily available and applicable to schools as pre-assessment interventions.

### D. Conclusion

The report by the Auditor General recommended:

"To ensure all special-needs assessments are completed in a timely and equitable manner, we recommend that school boards:

- establish reasonable timelines for completing psychological, and speech and language assessments;



- have access to all assessments wait lists at the board level and use this information to reassign assessments to specialists who have smaller workloads;
- implement a plan to clear backlogs; and
- track use of external assessments to better gauge demand." (page 643)

**In order to be able follow these recommendations, some of the underlying issues need to be addressed.**

- Consistent staffing levels for school psychologists across Ontario will be necessary to ensure fair and equitable access to psychological services to all Ontario students. By ensuring consistent and equitable staffing levels for other professionals (such as guidance and social work staff), effective collaboration between professionals can significantly contribute to the Ministry of Education goals of student well-being, as well as "supporting students in successful education and career/life planning."
- Additionally, more community based psychological services are needed to address the need for psychological services in the areas of health (including psychological assessments asked for by medical doctors); justice, university and colleges, child protection, disability support, that school psychologists are currently being asked to provide. If other appropriate ministries and community services could support these needs, this would ease the demand for school psychology services, currently funded only by Education.
- Furthermore, in order to address the province-wide shortage of qualified school psychologists, there is a need to purposefully and systematically support graduate training programs (via supporting practicum and residency placements).
- Consolidating the culture of using in-class and in-school early intervention in schools before a full psychological assessment is requested would help target students for full assessment more accurately. In the Ministry of Education's Policy and Program Memorandum No 8 (2014), in addition to the new definition of the Learning Disability exceptionality, there are guidelines regarding pre-assessment intervention, assessment and intervention, including the Individual Education Plan, which are applicable for all exceptionalities. With this approach, students truly in need for a Tier 3 intervention would be referred for assessment.

Respectfully submitted, on behalf of the Association of Chief Psychologists with Ontario School Boards (ACPOSB) and the Ontario Psychological Association Section on Psychology in Education (OPA SecPE),



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