

Exploring Assessment in Professional Psychology

Providing Documentation for Disabilities: Part II: Post-Secondary Education & Professional Exams



"When you complete these forms, proceed thoughtfully. You are not only taking legal responsibility for your statements and potentially putting your reputation on the line, but you are also representing the broader profession of psychology."

By Dr. Michael Lee Zwiers, R. Psych

Before I address this new content, I want to take a brief look back at the original article written in the June 2024 Psymposium. I wrote Part I of this two-part series on the psychologists' role in providing documentation to support clients' applications for disability supports, services, accommodations, and benefits. The timing appears to have been serendipitous, as I have seen a burgeoning of clients seeking my support to complete the Canada Revenue Agency (CRA) Disability Tax Credit form for them. I turn some people away at the outset, clarifying that this is not a frivolous application to make in the hopes that one might be approved. The current eligibility standard is quite high, and a medical practitioner must certify that the individual has *"a severe and prolonged impairment in 1 of the categories, significant limitations in 2 or more categories, or receive therapy to support a vital function."*

Psychologists are authorized to provide information regarding impairments within the category of *Mental Functions for everyday life*. According to the CRA, this includes: adaptive functioning, attention, concentration, goal-setting, judgment, memory, perception of reality, problem-solving, regulating behaviour and emotions, verbal and non-verbal comprehension. That should be straightforward enough, right? But we must be aware that the CRA definition of each of these categories will likely not match your own. For example, the category of "Attention" is limited to only: a) the ability to demonstrate awareness of danger and risk to personal safety, or b) the ability to demonstrate basic impulse control. And the category of "Memory" refers only to the ability to remember: a) basic personal information (e.g. date of birth and address), b) simple instructions, or c) material of importance and interest to *themselves*. The CRA has also clarified that mental functions for everyday life do not include the ability to work, to do housekeeping activities, or to engage in recreational activities.

In addition, the CRA clarifies that an applicant is considered *markedly restricted* in performing mental functions necessary for everyday life only if they are: a) unable to do the activity,

or b) it takes 3 times longer than someone of similar age without the impairment, even with the use of appropriate therapy, medication, and devices. Finally, the restriction must be present *all or almost all the time* (generally at least 90%) and has lasted – or is expected to last – for a continuous period of at least 12 months. When completing an application, we must attest to each of these components.

Not only must you pay attention to carefully assessing these core areas of functioning, but you must also ensure that you have documentation for all the years that you certify. Recently, the CRA audited an application that I completed for a client, requesting that I provide all the documentation that I used to support my responses and ratings. They were particularly interested in historical documentation that covered the years before I met the client (e.g. prior psychiatric and psychological assessment reports). So, take heed and be sure you carefully document your decisions and retain the data that supported your ratings.

I also wanted to advise you of companies across Canada that support clients by preparing clinician letters to provide to you as the medical practitioner. These companies can be quite persuasive in trying to convince you to use their wording and adopt their ratings of the client. For example, a disability application coach indicated that my wording needed to be stronger or the client would not qualify. Of course, my goal is not to ensure that a client qualifies for the tax credit, but to ensure that the CRA has trustworthy information to help them decide based on their own criteria. When I provide context or examples, I try to distinguish client information that was objective or observed by myself from self-reports that I collected via an interview (i.e., *"She described her home as messy and disorganized..."*).

When you complete these forms, proceed thoughtfully. You are not only taking legal responsibility for your statements and potentially putting your reputation on the line, but you are also representing the broader profession of psychology which the government has entrusted with accurately completing these forms.

Now to Part II: Providing Documentation for Disabilities in Post-Secondary Education and Professional Exams.

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Providing Documentation for Disabilities: Part II: Post-Secondary Education & Professional Exams

Under human rights legislation, school districts across Canada are required to accommodate people with a range of disabilities. Psychologists often diagnose learning disabilities, emotional and behavioural disorders. Diagnoses are often a gateway criterion for students to be eligible for supports and services. Impairments in functioning are also required, and recommendations flow from those identified impairments. These then become part of an Individual Education Plan (IEP). Although post-secondary institutions do not create IEPs per se, they do delineate accommodations that are to be provided by professors. Some supports are available, but these are rarely provided in classes (e.g. sign-language interpreter, small-group instruction). In post-secondary, your recommendations can focus on instruction, in-class learning, assignments, studying, and exams. Here are some of the common accommodations that I might request.

General accommodations might include a reduced course load (governments may nonetheless set a minimum course load to qualify as a full-time student and be eligible for student loans), organizational software, support from a learning strategist, skills workshops, and tutoring services (which are eligible as a medical expense deduction if prescribed by a psychologist). *Instructional accommodations* might include copies of lecture materials, recorded lectures, note-taking services, assigned seating, or early arrival and dismissal. *Assignment accommodations* might include clarified task expectations, access to technology such as text-to-speech or speech-to-text, additional time, flexible due dates, alternatives to group work, noise reduction, sensory reduction, stress management, physical breaks, an adapted workstation, and access to a calming space.

For examinations, common accommodations include access to a quiet space, extended time, stop-the-clock breaks, an exam proctor, review of exam scheduling to ensure no more than one major exam is taken on any given day, and alternative forms of evaluation when possible. Technology supports can include access to a computer for exams, or other exam supports such as a proctor to clarify test questions, and formula sheets for individuals with working memory weaknesses.

High-Stakes Exams

Although human rights legislation applies everywhere, high-stakes evaluation such as entrance exams for educational programs (i.e. professions) and professional credentialing examinations, are often trickier to obtain accommodations to complete. Depending on the field in question, the creators and overseers of these examinations might be extremely reluctant to provide any accommodations or supports to test takers. Often, they do not publish the names of the professionals who sit on their review panel to adjudicate

applications for exam accommodations, so decisions occur in a kind of black box. Historically, they have not identified what form of documentation they consider to be adequate to support a request. Until more case law emerges, or more adjudications are provided by human rights tribunals, we mostly operate in the dark. To save you and your client stress and hassles of appealing a decision, I suggest routinely reviewing the requirements to access accommodations, which are usually posted on their website. The requirements can change rapidly, so make sure that you are reviewing the most current iteration and are not relying on outdated forms and requirements. I also recommend inquiring in advance about what form of documentation these bodies would find acceptable to qualify for access to accommodations you suspect will be needed. Then, when you make your request for *what* accommodations they need, it is important to provide a clear and defensible rationale for *why*. Remember that the purpose is not to give the exam taker any advantage, but to level the playing field and allow them to demonstrate their knowledge, judgement, and skill.

If we present our documentation and logic together with our requests, we are more likely to be successful in helping the adjudicators understand why the requested accommodations might be necessary and appropriate.

It has been almost 4 years since *Exploring Assessment in Professional Psychology* launched as a feature column. As the inaugural author of the column, I would like to thank you for your readership. This month's issue will be my last contribution. I would like to briefly introduce you to Dr. Mitchell Colp from Hexagon Psychology, who will be taking over leadership of the column. Among other accomplishments, Dr. Colp has been a strong advocate for tele-psychology and – with his colleagues at Hexagon Psychology – he developed a Canadian Psychological Association (CPA) accredited tele-assessment training program. Speaking of the CPA, Mitch is the President Elect of the Association and will be stepping into his role as CPA president later this year. I know that he will represent Alberta psychologists with intelligence, poise, and good humour. If you don't already know Mitch, you can look forward to meeting him in the next issue of this column!

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