



INTERNSHIP DUE PROCESS GUIDELINES

DEFINITION OF PROBLEM

For purposes of this document Intern problem is defined broadly as an interference in professional functioning which is reflected in one or more of the following ways: 1) an inability and/or unwillingness to acquire and integrate professional standards into one's repertoire of professional behavior, 2) an inability to acquire professional skills in order to reach an acceptable level of competency, and/or 3) an inability to control personal stress, psychological dysfunctions, and/or excessive emotional reactions which interfere with professional functioning.

While it is a professional judgment as to when an Intern's behavior becomes more serious (i.e., problematic) rather than just of concern, for purposes of this document a concern refers to a trainees' behaviors, attitudes, or characteristics which, while of concern and which may require remediation, are perceived to be not unexpected or excessive for professionals in training. Problems typically become identified as problems when they include one or more of the following characteristics:

- 1) the Intern does not acknowledge, understand, or address the problem when it is identified,
- 2) the problem is not merely a reflection of a skill deficit which can be rectified by academic or didactic training,
- 3) the quality of services delivered by the Intern is sufficiently negatively affected,
- 4) the problem is not restricted to one area of professional functioning,
- 5) a disproportionate amount of attention by training personnel is required,
- 6) the trainee's behavior does not change as a function of feedback, remediation efforts, and/or time,
- 7) the problematic behavior has potential for ethical or legal ramifications if not addressed,
- 8) the intern's behavior negatively impacts the public view of the agency,
- 9) the problematic behavior negatively impacts the Intern program

Natalis General Guidelines for Intern and Training Program Responsibilities

The Psychology Predoctoral Internship is designed as a General Internship and is seen as a component of the doctoral training process in Clinical Psychology. Broadly, the Internship aims to provide the intern with the opportunity (in terms of setting, experience, and supervision) to begin assuming the professional role of a psychologist consistent with the scientist/practitioner model. This role entails the integration of previous training and a further development of the scientific, professional, and ethical bases involved in professional functioning.

I. Training Program's Expectation of Interns

The expectations of interns are divided into three areas:

- 1) knowledge of and conformity to relevant professional standards,
- 2) acquisition of appropriate professional skills, and
- 3) appropriate management of personal concerns and issues as they relate to professional functioning.

Each of these areas is described below:

A. Professional Standards

Interns are expected to:

1. Be cognizant of and abide by the guidelines as stated in the APA Ethical Principles of Psychologists and Code of Conduct, Standards for Providers of Psychological Services, Specialty Guidelines, and any other relevant, professional documents or standards which address psychologists' ethical, personal and/or legal responsibilities.
2. Be cognizant of and abide by the laws and regulations governing the practice of psychology as included in appropriate legal documents. Such documents include but are not necessarily limited to the Minnesota Board of Psychology

It is recognized by the training program that mere knowledge of and exposure to the above guidelines and standards are not sufficient. Interns need to demonstrate the ability to integrate relevant professional standards into their own repertoire of professional and personal behavior. Examples of such integration include a demonstrated awareness of ethical issues when they arise in work with clients, appropriate decision making in other ethical situations, and awareness of ethical considerations in their own and other's professional work.

B. Professional Competency

By the time the internship is complete, Interns are expected to:

1. Demonstrate knowledge of psychopathology and of developmental, psychosocial and psychological problems.
2. Demonstrate knowledge of the special issues involved in working with a minority and/or disadvantaged population.
3. Demonstrate diagnostic skills and methods of diagnosis including psychological assessment, interview assessment, and consultation for complications in practice
4. Demonstrate knowledge and skills in treatment, including psychotherapy (various modalities), case management, family therapy, group psychotherapy, crisis intervention, and medical consultation with children, adolescents, and adults.

The above competency expectations imply that Interns will be making adequate progress in the above areas (as assessed by periodic evaluations) and that Interns will achieve a level of competency by the completion of the internship which will enable them to successfully complete the internship and at least approaches the ability to function independently as a psychologist.

C. Personal Functioning

It is recognized by the training program that there is a relationship between level of personal functioning and effectiveness as a professional psychologist, most notably in one's role delivering direct services to clients. Physical, emotional and/or educational problems may interfere with the quality of an intern's professional work. Such problems include but are not limited to a) educational or academic deficiencies, b) psychological adjustment problems and/or inappropriate emotional responses, c) inappropriate management of personal stress, d) inadequate level of self-directed professional development, and e) inappropriate use of and/or response to supervision.

When such problems significantly interfere with an Intern's professional functioning, such problems will be communicated in writing to the Intern. The training program, in conjunction with the Intern, will formulate strategies for ameliorating such problems and will implement such strategies and procedures. If such attempts do not restore the Intern to an acceptable level of professional functioning within a reasonable period of time, discontinuation in the program may result. The specific procedures

employed for the acknowledgment and amelioration of Intern deficiencies will be described later in this paper.

II General Responsibilities of the Intern Program

A major focus of internship is to assist Interns in integrating their personal values, attitudes and functioning as individuals with their professional functioning. The training program is committed to providing the type of learning environment in which an Intern can meaningfully explore personal issues which relate to his/her professional functioning.

In response to the above intern expectations, the training program assumes a number of general responsibilities. The responsibilities correspond to the three general expectation areas (Professional Standards, Professional Competency, Personal Functioning) and are described below:

A. The Training Program

1. The training program will provide Interns with information regarding relevant professional standards and guidelines as well as providing appropriate forums to discuss the implementations of such standards.
2. The training program will provide Interns with information regarding relevant legal regulations which govern the practice of psychology as well as providing appropriate forums to discuss the implementations of such guidelines.
3. The training program will provide written evaluations of the Intern's progress with the timing and content of such evaluations designed to facilitate interns' change and growth as professionals. Evaluations will address the Interns' knowledge of and adherence to professional standards, their professional skill competency, and their personal functioning as it relates to the delivery of professional services.

In accepting the above responsibilities, the internship program will maintain communications with the Intern's graduate department regarding the trainee's progress during the internship year. The training program will provide appropriate mechanisms by which inappropriate intern behavior effecting professional functioning is brought to the attention of the intern. The training program will also maintain grievance and due process guidelines, to address and remediate perceived problems as they relate to professional standards, professional competency and/or professional functioning.

INTERN EVALUATION, REVIEW AND DUE PROCESS PROCEDURES

I The Evaluation Process

Interns are evaluated and given feedback throughout the year by their individual supervision in both formal and informal settings. Additionally, at the end of each rotation, the entire faculty evaluates Interns' performance and makes recommendations for the next rotation as well as future needs the Intern may experience. The Evaluation Form is completed by clinical supervisors after each rotation and discussed with the Intern, the evaluation of their performance and makes those recommendations and suggestions which are relevant. Then copies of the evaluation are given to the Training Director.

Thus, the TD receives information from all supervisors that include her /his own impressions and those of others who have had significant contact with the Intern. This process is viewed as an opportunity for the TD to provide integrative feedback regarding the collective experience of others who have had significant interactions with the Intern. Both parties discuss how the internship experience is progressing, and the Intern is provided with the opportunity to give his/her reactions and critiques of supervisors and other aspects of the training experience. It may be in the context of this meeting or whenever during the rotation that a problem is identified that the TD and the Intern may arrange for a modification of the Intern's training program to address his/her training needs and/or the needs of the training program.

II Initial Procedures for Responding to Inadequate Performance by an Intern (i.e.: Intern Problem)

If an Intern receives a rating of "adequate but needs improvement" from any of the evaluation sources, the following procedures will be initiated:

- A. The Intern's supervisor will meet with the TD to discuss the rating and determine what action needs to be taken to address the issues reflected by the rating.
- B. The Intern will be notified, in writing, that such a review is occurring and will have the opportunity to provide a statement related to his/her response to the rating.
- C. In discussing the inadequate rating and the Intern's response, (if available) the TD may adopt any one or more of the following methods or may take any other appropriate action. He/She may issue a:
 - 1) "Acknowledge Notice" which formally acknowledges a) that the supervisor is concerned with performance, b) that the rating has been brought to the attention of the intern, c) that the supervisor will work with the intern to specify the steps necessary to rectify the problem or skill deficits addressed by the rating, and d) that the behaviors associated with the rating are not significant enough to warrant serious action.
 - 2) "Probation" which defines a relationship such that their school faculty, through the supervisors and TD, actively and systematically monitor, for a specific length of time, the degree to which the Intern addresses, changes

and/or otherwise improves the behavior associated with the inadequate rating. The probation is a written statement to the Intern and includes:

- a) the actual behaviors associated with the inadequate rating,
- b) the specific recommendations for rectifying the problem,,
- c) the time frame for the probation during which the problem is expected to be ameliorated, and
- d) the procedures designed to ascertain whether the problem has been appropriately rectified, or

3) "Take no further action.

- D. The TD will then meet with the Intern to review the action taken. If "Probation," the Intern may choose to accept the conditions or may choose to challenge the action. The procedures for challenging the action are presented in section III of this document.
- E. If either the Acknowledgment Notice or the Probation Action occurs, the TD will inform the intern's sponsoring university, indicating the nature of the inadequate rating, the rationale for the action, and the action taken by the faculty. The Intern shall receive a copy of the letter to the sponsoring university.
- F. Once the Acknowledgment Notice or Probation is issued by the TD, it is expected that the status of the rating will be reviewed no later than the next formal evaluation period or, in the case of probation, no later than the time limits identified in the probation statement. If the rating has been rectified to the satisfaction of the faculty, the Intern, sponsoring university and other appropriate individuals will be informed and no further action will be taken.

III Situations in which Grievance Procedures are Initiated

There are three situations in which grievance procedures can be initiated:

- A. when the Intern challenges the action taken by the faculty (Intern Challenge),
- B. when the faculty is not satisfied with the Intern's action in response to the action (Continuation of the Inadequate Rating), or
- C. when a member of the faculty initiates action against an Intern (Intern Violation).

Each of these situations, and the course of action accompanying them, is described below.

- A. Intern Challenge. If the Intern challenges the action taken by the faculty as

described in II above, s/he must, within 10 days of receipt of the decision, inform the TD, in writing, of such a challenge.

- 1) The TD will then convene a Review Panel consisting of one program supervisor selected by the TD and one program supervisor selected by the intern. The Intern retains the right to hear all facts with the opportunity to dispute or explain his or her behavior.
- 2) A review hearing will be conducted, chaired by the TD, in which the challenge is heard and the evidence presented. Within 15 days of the completion of the review hearing, the Review Panel submits a written report to the Chief Psychologist/or outside consultant if the Chief Psychologist also serves as TD, including any recommendations for further action. Decisions made by the Review Panel will be made by majority vote. The Intern is informed of the recommendations.
- 3) Within 5 days of receipt of the recommendations, the Chief Psychologist will either accept the Review Panel's action, reject the Review Panel's action and provide an alternative, or refer the matter back to the Review Panel for further deliberation. The Panel then reports back to the Chief Psychologist within 10 days of the receipt of the Chief Psychologist's request for further deliberation. The Chief Psychologist then makes a decision regarding what action is to be taken and that decision is final..
- 4) Once a decision has been made, the Intern, sponsoring university and other appropriate individuals are informed in writing of the action taken.

B. Continuation of Inadequate Rating. If the faculty determines that there has not been sufficient improvement in the intern's behavior to remove the inadequate rating under the conditions stipulated in the probation, then a formal Review Panel will be convened.

- 1) The TD will communicate, in writing, to the Intern that the conditions for revoking the probation have not been met. The faculty may then adopt any one of the following methods or take any other appropriate action. It may issue a:
 - a) continuation of the probation for a specific time period,
 - b) suspension whereby the Intern is not allowed to continue engaging in certain professional activities until there is evidence that the behavior in question has improved,
 - c) communication which informs the Intern the TD is recommending to the Chief Psychologist that the Intern will not if the behavior does not change, successfully complete the internship, and/or

- d) communication which informs the Intern that the TD is recommending to the Chief Psychologist that the Intern be terminated immediately from the internship program.
- 2) Within 5 working days of receipt of this determination, the Intern may respond to the action by a) accepting the action or b) challenging the action.
- 3) If a challenge is made, the Intern must provide the TD, within 10 days, with information as to why the Intern believes the action is unwarranted. A lack of reasons by the Intern will be interpreted as complying with the sanction.
- 4) if the Intern challenges the action, a Review Panel will be formed consisting of the TD, two staff members selected by the TD, and two staff members selected by the Intern.
- 5) A Review Panel hearing will be conducted" chaired by the TD, in which the challenge is heard and the evidence presented. Within 10 days of the completion of the review hearing, the Review Panel shall communicate its recommendation to the Intern and to the Chief Psychologist. Decisions by the Review Panel will be made by majority vote.
- 6) Within 5 days of receipt of the recommendations, the Chief Psychologist will either accept the Review Panel's action, reject the Review Panel's action and provide alternative action, or refer the matter back to the Review Panel for further deliberation. The Panel then reports back to the Chief Psychologist within 10 days of the receipt of the Chief Psychologist's request for further deliberation. The Chief Psychologist then makes a decision regarding what action is to be taken and that decision is final.
- 7) Once a decision has been made, the Intern, sponsoring university and other appropriate individuals are informed in writing of the action taken.

C. Intern Violation. Any faculty member may file, in writing, a grievance against an Intern for any of the following reasons: a) unethical or legal violation of professional standards or laws, b) professional incompetence, or c) infringement on the rights, privileges or responsibilities of others.

- 1) The TD will review the grievance with 2 members program supervisors and determine if there is reason to proceed and/or if the behavior in question is in the process of being rectified.
- 2) If the TD and other two members determine that the alleged behavior in the complaint, if proven, would not constitute a serious violation the TD shall inform the faculty member who may be allowed to renew the complaint if additional information is provided.

- 3) When a decision has been made by the TD and the other two faculty members that there is probable cause for deliberation by the Review Panel, the TD shall notify the faculty member and request permission to inform the Intern. The faculty member shall have five days to respond to the request and shall be informed that failure to grant permission may preclude further action. If no response is received within 5 days or permission to inform the Intern is denied, the TD and the two members shall decide whether to proceed with the matter.
- 4) If the Intern is informed, a Review Panel is convened consisting of the TD, two members selected by the faculty member, and two members selected by the Intern. The Review Panel receives any relevant information from both the Intern or faculty member as it bears on its deliberations.
- 5) A review hearing will be conducted, chaired by the TD in which the complaint is heard and the evidence presented. Within 10 days of the completion of the review hearing, the Review Panel shall communicate its recommendation to the Intern and to the Chief Psychologist. Decisions by the Review Panel shall be made by majority vote.
- 6) Within 5 days of receipt of the recommendation, the Chief Psychologist will either accept the Review Panel's action, reject the Review Panel's recommendation and provide alternative action, or refer the matter back to the Review Panel for further deliberation. The Panel then reports back to the Chief Psychologist within 10 days of the receipt of the Chief Psychologist's request for further deliberation. The Chief Psychologist then makes a decision regarding what action is to be taken and that decision is final.
- 7) Once a decision has been made the Intern, faculty member sponsoring university, and other appropriate individuals are informed in writing of the action taken.

IV Situations where Interns raise a formal complaint or grievance about a supervisor, staff member, trainee, or program.

There may be situations in which the Intern has a complaint or grievance against a supervisor, staff member, other trainee, or the program itself and wishes to file a formal grievance. The Intern should:

- A) Raise the issue with the supervisor, staff member, other trainee, or Training Director in an effort to resolve the problem.
- B) If the matter cannot be resolved, or it is inappropriate to raise with the other individual, the issue should be raised with the Training Director. If the Training Director is the object of the grievance, or unavailable, the issue should be raised with the Chief Psychologist/ or outside consultant-mediator.
- C) If the Training Director cannot resolve the matter, the Training Director will choose an agreeable faculty member acceptable to the Intern who will attempt to mediate the matter. Written material will be sought from both parties.
- D) If mediation fails, the Training Director will convene a review panel (except for complaints against staff members where the grievance procedures for that person's discipline will be followed) consisting of the Training Director, the Chief Psychologist and two supervisors of the Interns choosing. The Review Panel will review all written materials (from the Intern, other party, mediation) and have an opportunity at its discretion to interview the parties or other individuals with relevant information. The Review Panel has final discretion regarding outcome.
- E) Nothing here precludes attempted resolution of difficulties by adjudication at a school or university level. These guidelines are intended to provide the psychology Intern with a means to resolve perceived conflicts that cannot be resolved by informal means. Interns who pursue grievances in good faith will not experience any adverse personal or professional consequences.

REMEDATION CONSIDERATIONS

It is important to have meaningful ways to address problem once it has been identified. Several possible, and perhaps concurrent courses of action designed to remediate problems include but are not limited to:

- 1) increasing supervision, either with the same or other supervisors,
- 2) changing in the format, emphasis, and/or focus of supervision,
- 3) recommending and/or requiring personal therapy in a way that all parties involved have clarified the manner in which therapy contacts will be used in the Intern evaluation process.
- 4) reducing the Intern's clinical or other workload and/or requiring specific academic coursework, and/or
- 5) recommending, when appropriate, a leave of absence and/or a second Internship.

When a combination of the above interventions does not, after a reasonable time period, rectify the problem, or when the trainee seems unable or unwilling to alter his/her behavior, the training program may need to take more formal action, including such actions as:

- 1) giving the Intern a limited endorsement, including the specification of those settings in which he/she could function adequately,
- 2) communicating to the Intern and academic department/program that the Intern has not successfully completed the internship, with the possibility of continuing the year as a practicum placement.
- 3) recommending and assisting in implementing a career shift for the Intern, and/or
- 4) terminating the Intern from the training program.

All the above steps need to be appropriately documented and implemented in ways that are consistent with due process procedures.

DUE PROCESS: GENERAL GUIDELINES

Due process ensures that decisions made by programs about Interns are not arbitrary or personally based, requires that programs identify specific evaluative procedures which are applied to all trainees, and have appropriate appeal procedures available to the intern so he/she may challenge the program's action. General due process guidelines include:

- 1) presenting Interns' in writing, with the program's expectations related to professional functioning,
- 2) stipulating the procedures for evaluation, including when and how evaluations will be conducted. Such evaluations should occur at meaningful intervals,
- 3) articulating the various procedures and actions involved in making decisions regarding problem,
- 4) communication, early and often, with graduate programs about any suspected difficulties with Interns, seeking input from these academic programs about how to address such difficulties,
- 5) instituting, with the input and knowledge of the graduate program, a remediation plan for identified inadequacies, including a time frame for expected remediation and consequences of not rectifying the inadequacies,
- 6) providing a written procedure to the Intern which describes how the Intern may appeal the program's action,
- 7) ensuring that Interns have sufficient time to respond to any action taken by the program,
- 8) using input from multiple professional sources when making decisions or recommendations regarding the Intern's performance, and
- 9) documenting, in writing and to all relevant parties, the action taken by the program and its rationale.