

High Plains Psychology Internship Consortium (High Plains PIC)

Due Process Policy

High Plains Psychology Internship Consortium is committed to maintaining a high-quality internship program that promotes learning and professional growth for interns. Our supervisors value work environments that are challenging, flexible, supportive of diversity, and supportive of individual needs and requirements. To accomplish this goal, supervisors provide ongoing feedback to interns that is designed to facilitate professional and personal growth.

Since the internship is a training experience, it is expected that Interns will make significant development growth during this year and may need support and assistance during this time. Supervisors at HPPIC are committed to intern growth and as such, provide activities, feedback, and learning opportunities that can facilitate growth. Other forms of support include orientation meetings, individualized programs, clear and realistic expectations, clear and timely evaluations which include suggestions for positive change, regular access to support individuals (e.g., supervisors) and/or groups (e.g., other interns, other practitioners, former interns), seminars specifically addressing expected stressors and transitions, and attention to the gradual increase in both the number and complexity of clients. It is the responsibility of the HPPIC intern to be responsive to supervisor feedback, engage fully in remedial learning activities that are recommended by the supervisor, and commit fully to the provision of effective psychological services that are needed to benefit their clients.

This document outlines the rights and responsibilities of interns in the training process. It also outlines the supervision, evaluation, and due process procedures.

Intern Rights and Responsibilities

Intern Rights

1. The right to a clear statement of general expectations upon entry into the internship, including a clear statement of goals and parameters of the training experience.
2. The right to be trained by professionals who behave in accordance with the APA ethical guidelines.
3. The right to be treated with professional respect, that recognizes the training and experience the intern brings with them.
4. The right to ongoing evaluation that is specific, respectful, and pertinent.
5. The right to engage in an ongoing evaluation of the HPPIC experience.
6. The right to initiate an informal resolution of problematic training experiences through discussion or written request to their supervisor and/or to the HPPIC Training Director and HPPIC Associate Training Director if informal resolution has failed to address problems or to determine whether rights have been infringed.
7. The right to respect for one's personal privacy.

Intern Responsibilities

1. The responsibility to read, understand and clarify the HPPIC Intern Handbook and any policy documents associated with the respective HPPIC agency related to expectations or any other material included in these documents.
2. The responsibility to adhere to the principles set forth by the statutes and regulations of the American Psychological Association, the National Association of School Psychologists (for school-based interns) the appropriate state regulations, and the respective HPPIC agency.
3. The responsibility to be responsive to professionally appropriate feedback from supervisors, professional staff, and agency personnel.
4. The responsibility to prioritize the well-being of your clients.
5. The responsibility to behave in a manner that promotes professional interactions and is in accordance with the standards and expectations of the respective HPPIC agency.
6. The responsibility to give constructive feedback that evaluates the training experience or other experiences in the HPPIC.
7. The responsibility to conduct oneself in a professionally appropriate manner if due process is initiated.
8. The responsibility to actively participate in the training, clinical services, and the overall activities of HPPIC. This includes requirements of completing documentation in a timely manner, attending all training activities, completing and submitting logs to supervisors, and providing information to the HPPIC Training Director as requested for completion of all reports.
9. The responsibility to meet internship expectations by developing a Proficient level of competency in the nine Health Service Provider competencies outlined by APA; and other dispositional areas as delineated in the intern evaluation forms.

Due Process Procedures

Due Process Procedures are implemented in situations in which a supervisor or other faculty member raises a concern about the functioning of a psychology intern. These procedures are for the protection of intern rights and are implemented to afford the intern every reasonable opportunity to remediate problems and to receive support and assistance. These procedures are not intended to be punitive. Specifically, due process ensures that decisions made by programs about interns are not arbitrary, that specific evaluative procedures are used, and that there is an appeals process available to interns allowing them to challenge the program's actions.

Definition of a Problem

For purposes of this document, a problem is defined broadly as 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.

It is a professional judgment as to when an issue becomes problematic rather than of concern. Intern trainees may exhibit behaviors, attitudes, or characteristics that, while of concern and requiring attention, are not unexpected or excessive for professionals in training. Issues typically are identified as problems that require remediation 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 the scheduled sequence of clinical 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, 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 cohort;
10. the problematic behavior potentially or actually causes harm to a patient; and/or,
11. the problematic behavior violates appropriate interpersonal communication with agency staff.

Guidelines for Due Process

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 problematic behavior.
4. Communicating, early and often, with graduate programs about any suspected difficulties with interns and 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 or probationary plan for identified inadequacies, including a time-frame 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. Such procedures should be included in the program's handbook and made available to the intern at the beginning of the internship.
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 intern performance.
9. Documenting, in writing and to all relevant parties, the action taken by the program and its rationale.

Procedural Guidelines

High Plains PIC's Due Process Procedures occur in a stepwise fashion, involving greater levels of intervention as a problem increases in persistence, complexity, or level of disruption to the training program. Intern progress is monitored throughout the internship program and supports and adjustments are made according to their individual needs. However, if at any time the intern is identified engaging in behavior that is problematic (as defined above), the intern and their supervisory team will meet to consider the intern's progress. If repeated attempts to remediate the intern's deficits have been unsuccessful, a process for considering further action will be initiated. Involvement of the intern's Director of Clinical Training is encouraged at any point in these procedures, but Directors of Clinical Training must be notified if the procedures progress to Step 3.

Step 1

When a determination is made that an educational or professional problem exists, the intern and their supervisor will discuss the problem and outline ways to correct or rectify the problem. This interaction should include ample opportunities for the intern to react to the information presented regarding a potential problem area. The concerns, action plan and resolution will be documented in the supervision notes. If a more formal plan is developed with action steps, the intern and supervisor will each be given a copy to monitor progress.

If the problem continues for more than 2 weeks, the supervisor will again discuss the nature of the problem with the intern. The intern will have the opportunity to discuss the problem in detail with their supervisor. The purpose of this meeting will be to develop additional intervention plans and to decide whether the current remediation plan or a revised remediation plan should be in force. This process should be documented in writing in supervision notes and discussed with the Training Director and Training Committee but will not become part of the intern's professional file if the concerns are resolved.

Step 2

If the problems or concerns are not resolved or progress on the plan is limited, a meeting will then be held with the intern, supervisor, and High Plains Training Director. The intern will be informed of the meeting at least one week prior to the date and will have the opportunity to provide additional evidence to the supervisor and HPPIC Training Director to consider at that meeting.

Similarly, at the mid-term evaluation period, if an intern has several items (5 or more) that are rated at lower than the expected minimum level of achievement of 3 on all element ratings, Step 2 of Due Process will be enacted. A score of 3 signifies an Intermediate level of competency which is expected at the mid-term evaluation period. If several scores are lower, the intern is at risk for not meeting the minimum level of competency by the end of the internship period.

The purpose of this meeting will be to develop additional action plans, decide whether the current or a revised remediation plan should stay in place, and determine whether to convene a subset of the HPPIC Supervisory Faculty to address the intern's difficulties (Step 3). This meeting should be held within 2 weeks of the midterm evaluation or the supervisor's decision that adequate progress is not occurring.

Step 3

If after a reasonable period (~2-4 weeks), there is not improvement in the intern's functioning or if the outcome of the Step 2 meeting results in a conclusion that an intern's skills, professionalism, or personal functioning are inadequate for an intern in training and if the refined remediation plan has not been successful in addressing the intern's difficulties, a remediation team representing the HPPIC Supervisory Faculty[RH1] Board will be convened. This remediation team will be comprised of at least 4 members representing different HPPIC agencies, not including the intern's supervisor/agency. The role of the HPPIC remediation team is to provide additional supervisory expertise in the remediation of interns' developmental problems and to represent HPPIC in deciding actions that will be taken. The remediation team will initiate the following procedures:

- The negative evaluations will be reviewed formally and a determination made as to what actions need to be taken to address the problems identified. The intern will be notified in writing that such review is occurring and that the HPPIC Supervisory Board may receive any information or statement that the intern wishes to provide with reference to the identified problems.
- The intern will be informed at least one week prior to the meeting.
- After reviewing all available information, the HPPIC Supervisory Board may take one or more of the following steps:
 - The board may elect to take no further actions.
 - The board may recommend that specific actions be taken to correct or resolve the problem and/or that it will reconvene at a specified later date to review the intern's progress
 - The board may issue an Acknowledgment Notice which formally states that the board is aware of and concerned about the negative evaluation; (b) the evaluation has been brought to the intern's attention and the supervisor will work with the intern to rectify the problem within a specified time frame; and (c) the behaviors associated with the negative evaluation are not significant enough to warrant more serious action at the time. This notice will be issued within 5 working days of the meeting among the HPPIC Supervisory Faculty Board, TD, supervisor, and intern, and will be shared with both the intern and the Director of Clinical Training at the intern's graduate institution.
 - The board may issue a Probation Notice (Step 4).

Step 4

If the HPPIC Supervisory Faculty Board (as represented by the remediation team) decides that the behaviors associated with the negative evaluation are significant enough to warrant more serious attention, the Board may issue a Probation Notice. Probationary status specifies that the board, through the supervisors and HPPIC Training Director, will actively and systematically monitor for a specific length of time, the degree to which the intern addresses, changes, and/or otherwise improves the problem behaviors. The Probation Notice is a written statement to the intern that includes the following items:

- A description of the problematic behavior.
- Specific recommendations for rectifying the problems.

- Criteria for ending the probationary status and procedures to assess whether the problem has been appropriately rectified.
- A time frame for the probation during which the problem is expected to be ameliorated.
- A summary of options available to the intern.

If the Board deems that remedial action is required, the identified impairment must be systematically addressed by the agency. Possible remedial steps include (but are not limited to) the following:

- Increased supervision, either with the same or other supervisors.
- Changed format, emphasis, and/or focus of supervision.
- A recommendation and/or requirement that personal therapy be undertaken with a clear statement about the manner in which such therapy contacts will be used in the intern evaluation process.
- Recommendation of a leave of absence and/or a second internship.

Following the delivery of an Acknowledgment Notice or Probation Notice, the HPPIC Training Director will meet with the intern to review the required remedial steps. The intern may elect to accept the conditions or may challenge the committee's actions as outlined below. In either case, the HPPIC Training Director will inform the intern's Director of Clinical Training at their home university and indicate the nature of the inadequacy and the steps taken by the HPPIC Supervisory Faculty Board. The intern shall receive a copy of the letter to the Director of Clinical Training.

Once an Acknowledgment Notice has been issued by the HPPIC Supervisory Board, the problem status will be reviewed within two months, or the next formal evaluation, whichever comes first. In the case of a Probation Notice, the problem status will be reviewed within the time frame set by the notice. At the end of the remediation period, the TD will provide a written statement indicating whether the problem has been remediated. This statement will become part of the intern's permanent file and shared with the intern and sent to the Director of Clinical Training at the intern's graduate institution.

Failure to Correct Problems

When a combination of interventions does not resolve the impairment within the established period of time, or when the intern seems unable or unwilling to alter their behavior, HPPIC may take more formal action. If an intern's probation has not proved sufficient to rectify the problems under the conditions stipulated by the probation notice, the HPPIC Faculty Supervisory Board will conduct a formal review and then inform the intern in writing that the conditions for revoking the probation have not been met. The committee may then take any of the following steps, or other appropriate action. Prior to this action, the Training Director will consult with APPIC to communicate whether the decision to discontinue and release the intern from their Match is being considered.

1. It may continue the probation for a specified time period.
2. It may issue a suspension, whereby the intern is not allowed to continue engaging in certain professional activities until there is evidence that the problem behaviors in question have been rectified.

3. It may inform the intern, the Director of Clinical Training at the intern's home University, and the other HPPIC Faculty that the intern will not successfully complete the internship if their behavior does not change. By the end of the training year, if the intern has not successfully completed the training requirements, the Board will not give the intern a certification of completion. The intern and the intern's university will be informed that the intern has not successfully completed the internship.

4. It may inform the intern that the Board is recommending to the intern's sponsoring university, that the intern be terminated immediately from the internship program and move to terminate the intern.

All the above steps will be appropriately documented and implemented in ways that are consistent with due process procedures, including opportunities for interns to initiate grievance proceedings to challenge Supervisory Board decisions. The intern will be informed of meetings at least one week prior to their occurrence and have the opportunity to provide evidence for consideration. If the decision has been to terminate the intern, the intern, the HPPIC Board of Supervisors, and the Director of Clinical Training at the intern's home university will be notified within ten days. The intern and Director of Clinical Training will be given an opportunity to respond orally and/or in writing to this decision. The Supervisory Board will consider this input prior to reaching a final decision.

Immediate suspension of an Internship

In some rare instances, an intern's performance may result in immediate suspension of an internship. Immediate suspension may result if the intern abandons the internship (defined as 5 consecutive working days of non-attendance without prior approval of leave of absence); violates agency disciplinary rules which would result in immediate dismissal for any other agency employee; commits serious violations of the ethical code that jeopardize the well-being of clients or co-workers; or commits serious legal violations that jeopardize the well-being of clients or coworkers.

If the Supervisor and the HPPIC Training Director agree that suspension of an internship is warranted, a remediation team representing a subset of the HPPIC Supervisory Board will be convened. This remediation team will be comprised of a subset of at least 4 members representing different HPPIC agencies, not including the intern's home agency. The role of the HPPIC remediation team is to determine whether the intern's performance justifies suspension of the internship. The remediation team will initiate the following procedures:

1. The written records and evaluations of the intern will be reviewed formally and a determination made as to whether the intern's performance justifies suspension.
2. The intern will be notified in writing that such a review is occurring at least one week prior to the meeting.
3. The intern will be notified in writing that the HPPIC Supervisory Faculty Board is prepared to receive any information or statement that the intern wishes to provide with reference to the identified problems.
4. After reviewing all available information, if the HPPIC Supervisory Board determines that termination is warranted, the intern, the HPPIC Faculty, and the intern's Director of Clinical Training at their home university will be notified. The intern and Director of Clinical Training will be given an opportunity to respond orally and/or in writing to this decision.

5. If, after reviewing all available information, the Supervisory Board determines that termination is not warranted, the Board will recommend remedial actions to rectify the performance problems of the intern.

If the HPPIC Supervisory Board recommends termination, the entire Training Committee and a representative of the training site's Human Resources will be convened to make this decision. The Training Committee will make this determination during a meeting convened within two weeks (working days) of the original meeting or during the regularly-scheduled monthly Training Committee meeting, whichever occurs first. The TD has the authority, in their discretion, to temporarily suspend an intern's clinical activities during this period prior to a final decision being made, if warranted. In the event of dismissal, the Association of Psychology Postdoctoral and Internship Centers (APPIC) and the intern's Director of Training at the intern's home doctoral program would be contacted within 5 working days of the decision.

Appeals Process

If the intern wishes to appeal a decision made, they may request an Appeals Hearing before the review panel as described below. This request must be made in writing (an email will suffice) to the TD within 5 working days of notification regarding the decision. If requested, the Appeals Hearing will be conducted by a review panel convened by the TD and consisting of him/herself (or another supervisor, if appropriate), the intern's primary supervisor, and at least two other members of the Training Committee. The intern may request one specific member of the Training Committee to serve on the review panel. The Appeals Hearing will be held within 10 working days of the intern's request for a hearing. The review panel will review all written materials and have an opportunity to interview the parties involved or any other individuals with relevant information. The review panel may uphold or modify the decisions. Decisions of the review panel are final and binding on the intern and all persons or entities connected with High Plains PIC.

Grievance Procedures

Grievance Procedures are utilized in situations in which a psychology intern raises a concern about a supervisor or other faculty member, trainee, or the internship training program. These guidelines are intended to provide the psychology intern with a means to resolve perceived conflicts. Interns who pursue grievances in good faith will not experience any adverse professional consequences. For situations in which an intern raises a grievance about a supervisor, staff member, trainee, or the internship program, the following steps will be taken:

Informal Review

First, the intern should raise the issue as soon as feasible with the involved supervisor, staff member, another trainee, or TD to resolve the problem informally.

Formal Review

If the matter cannot be satisfactorily resolved using informal means, the intern may submit a formal grievance in writing to the TD. If the TD is the object of the grievance, the grievance should be submitted to another member of the Training Committee. The individual being grieved will be asked to submit a response in writing. The TD (or Training Committee member, if appropriate) will meet with the intern and the individual being grieved within 10 working days of the submission of the formal written

grievance. In some cases, the TD or other Training Committee members may, in their discretion, wish to meet with the intern and the individual being grieved separately first. The goal of the joint meeting will be to develop a plan of action to resolve the matter. The plan of action will include:

- a) the behavior associated with the grievance;
- b) the specific steps to rectify the problem; and,
- c) procedures designed to ascertain whether the problem has been appropriately rectified.

The TD or other Training Committee members will document the process and outcome of the meeting. The intern and the individual being grieved will be asked to report back to the TD or other Training Committee member in writing within 10 working days of the joint meeting referenced above regarding whether the issue has been adequately resolved.

If the plan of action fails, the TD or other Training Committee member will convene a review panel consisting of him/herself and at least two other members of the Training Committee within 10 working days of this determination. The intern may request one specific member of the Training Committee to serve on the review panel. The review panel will review all written materials and have an opportunity to interview the parties involved or any other individuals with relevant information. Decisions of the review panel are final and binding on the intern and all persons or entities connected with High Plains PIC.

If the review panel determines, at its discretion, that a grievance against a staff member cannot be resolved internally or is not appropriate to be resolved internally, then the issue will be turned over to the employment agency in order to initiate the due process procedures outlined in the staff member's employment contract. If the review panel determines that the grievance against the staff member has the potential to be resolved internally, the review panel will develop a second action plan that includes the same components as described in a), b), and c). The process and outcome of the panel meeting will be documented by the TD or other Training Committee member. The intern and the staff member being grieved will again be asked to report back in writing regarding whether the issue has been adequately resolved within 10 working days of the issuance of the second action plan. The panel will reconvene within 10 working days of the written statement review written documentation and determine whether the issue has been adequately resolved. For circumstances in which an intern has filed a grievance against a faculty or staff member, and internal resolution by the internship has been deemed inappropriate, the issue will be turned over to the employment agency for a successful resolution.