

# **Santa Barbara Psychology Internship Consortium**

## **Policies and Procedures of Evaluation, Due Process, Termination, & Grievance**

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### **Introduction**

This document provides SB-PIC trainees with an overview of the identification and management of trainee problems and concerns, considerations in the remediation of problems, a listing of possible actions, and an explicit discussion of the due process procedures. Due process ensures that decisions made by internship supervisors about trainees are not arbitrary or biased, requires the internship site to identify specific evaluative procedures that are applied to all trainees, and have appropriate appeal procedures available to the trainee to challenge the internship's actions. SB-PIC encourages supervisors and trainees to discuss and resolve conflicts informally; however, if this cannot occur, this document was created to provide a formal mechanism for SB-PIC to respond to issues of concern.

The Santa Barbara School Psychology Internship Consortium (SB-PIC) is committed to facilitating learning and professional growth for interns. A major emphasis of the internship experience is to assist interns in integrating their personal values, attitudes and functioning as individuals with their professional functioning. The SB-PIC program is committed to providing the type of learning environment in which an intern can meaningfully explore one's professional functioning. In response to interns' expectations, the training program assumes a number of general responsibilities. Primarily, it recognizes that the provision of ongoing feedback to interns is fundamental to a successful training experience.

The internship program has the responsibility to assess the progress of each intern throughout his/her training. In order to maximize intern growth and professional development, it is important that such assessment be done on a continuing basis at timely intervals. It is also important that an intern's expected performance be explained in advance along with the provisions for intern feedback if dilemmas or problems arise. SB-PIC training staff recognize that developmental stressors are inherent both in the interns' transition from graduate school to the internship setting, as well as during the internship itself. For example, when entering the internship the rapidity with which interns must assimilate into a new environment and the expectation of competency in diverse professional activities may be the source of considerable stress. Furthermore, supervision of their performance in these activities may be more intense, concentrated, and frequent than trainees may have previously received in their graduate programs. Thus, while the internship represents a critical professional opportunity for interns to learn and refine skills, gain a greater sense of professional confidence, and develop a greater sense of professional identity, it is also a time of increased stress and vulnerability.

As interns confront significant developmental transitions, they may need special kinds of support and assistance. In order to provide pertinent information and to derive supportive measures or appropriate remediation, it is necessary for the internship program, in concert with the individual intern, to have an accurate sense of how the intern is progressing in relation to standardized criteria or norms. Every effort is made to ensure that interns understand the program's expectations about areas, as well as levels of performance. Further, because interns receive ongoing feedback from the Training Director, the training staff (including individual supervisors in various areas), and other professionals with whom they have significant contact, interns should have "no surprises" resulting from more formal evaluation procedures. Thus, this document outlines the rights, responsibilities, and exit criteria for interns in the training process as well as supervisor responsibilities. It also outlines the procedures for evaluation and formal grievance. Finally, it describes the due process procedures available to interns who have received notice of termination.

### **Intern Rights**

1. The right to a clear statement of general rights and responsibilities upon entry into the internship.
2. The right to be trained by professionals who behave in accordance with APA ethical guidelines.
3. The right to be treated with professional respect, that recognizes the training and experience the intern brings with him/her.
4. The right to ongoing evaluation that is specific, respectful, and pertinent.
5. The right to engage in an ongoing evaluation of the training program experience.
6. The right to initiate an informal resolution of problems that might arise during the training experience.
7. The right to due process.

### **Intern Responsibilities**

1. The responsibility to read, understand and clarify, if necessary the statement of rights and responsibilities. It is assumed that these responsibilities will be exercised and their implementation is viewed as a function of competence.
2. The responsibility to maintain behavior within the scope of the APA ethical guidelines. These principles are set forth in the APA's "Ethical Principles of Psychologists and Code of Conduct."
3. The responsibility to follow the policies and procedures of the internship program as well as the policies and procedures of your respective SB-PIC Site(s).
4. The responsibility to be open to professionally appropriate feedback from supervisors, professional staff, and agency personnel.
5. The responsibility to behave in a manner that promotes professional interactions.
6. The responsibility to give constructive feedback that evaluates the training experience or other experiences in SB-PIC.
7. The responsibility to actively participate in the training, clinical services, and the overall activities of the Consortium. This includes requirements of completing site and SB-PIC paperwork in a timely manner, attending monthly training seminars,

completing logs, and providing information to the SB-PIC office as requested for completion of all informational reports.

8. The responsibility to meet training expectations by developing competency in all areas delineated in the internship plan.

### **Completion Criteria**

In order to successfully complete the internship, the following criteria must be met:

- Total training time should approximate 1500 hours. For interns who are seeking 2000 hours of training, we can work together to establish a plan in advance to extend the duration and fulfill additional hours, when desired.
- A minimum of 600 hours has been spent in a school setting.
- A minimum of 600 hours has been spent in direct service.
- Interns have engaged in meaningful training experiences with both general and special education students ranging from 3-21 years old.
- Competency-based evaluations indicate that the intern's performance is commensurate with that expected of an entry-level professional psychologist.
- Competency requirements have been met during the one-year full-time doctoral internship.
- An average of four hours per week has been spent in regularly scheduled, formal, face-to-face supervision, at least two hours of which were on an individual basis.
- All client records, paperwork, and work products have been completed and reviewed with supervisors before the end of internship.

## Evaluation Procedures

Interns are assigned at least one licensed clinical psychologist supervisor and a number of other supervisors at least one of whom is a credentialed school psychologist. The group of supervisors serves as the intern's Training Committee (TC). One doctoral, clinically licensed supervisor is assigned for two hours of supervision per week, and the others for additional hours. Intern and supervisors determine the proportion of the intern's training that will be supervised by each supervisor.

In the context of these supervisory relationships, interns receive ongoing feedback regarding their professional strengths and areas/skills in need of improvement. Two formal feedback sessions are held during the year. In December and May, supervisors provide interns with verbal feedback regarding their progress on profession-wide competencies. Following the session, they provide the Training Director (TD) with a summary paragraph. Because it is important that in the course of the internship the home university is kept apprised of the intern's training experience, the TD provides the supervisors' feedback to the designated program representative. In December and May, the supervisor provides the TD with formal ratings of each of their intern supervisees using the SB-PIC Internship Plan as well as the narrative feedback summary. The Internship Plan provides a structured opportunity for supervisors to provide feedback on the profession-wide competencies. In addition to these periodic feedback sessions, the supervisor provides informal feedback during supervision sessions and reviews SB-PIC work products to determine whether they are commensurate with those of an entry-level health service psychologist; they ultimately document this performance on the Internship Plan.

At the end of each of the evaluation periods, the TC reviews the progress of each intern. Each supervisor reviews and discusses the evaluation with the intern (either alone or in concert). This process is designed to provide both evaluative feedback and suggestions and recommendations for improvement. Interns also use this session to provide verbal and written feedback to the supervisors regarding their role as supervisors and of their perception of supervision. Perceptual and/or factual differences between the supervisors' evaluation and that of the intern are expected to be resolved during this evaluation meeting. Interns are invited to respond in writing to the evaluation and submit it to the TD. A copy of the evaluation is forwarded to the TD and the ratings are entered into the SB-PIC data management system. A copy of the final ratings on the Internship Plan is provided to the intern and the intern's home university.

The profession-wide competencies and corresponding performance indicators, are rated on the Internship Plan. The supervisor selects the appropriate rating from the following:

- Not able to perform activity satisfactorily (1)
- Can perform activity but requires supervision (2)
- Acceptable and typical level of performance (3)
- More than acceptable and typical performance (4)
- Outstanding ability, initiative, and adaptability (5)

**A. Informal Response** (within 1 week of the evaluation period). At the mid-point, interns are expected to have reached a rating of, “Can perform activity but requires supervision” or above for each of the objectives on the Internship Plan. However, by the end of the first quarter, if not before, it is expected that supervisors and interns will have identified some areas of intern performance that are stronger and some that are weaker. If the intern demonstrates a skill-level in one or more objectives that is less developed than expected and is likely to result in an inadequate rating on the mid-year evaluation, supervisors will bring this to the attention of both the intern and the TD. The TC and intern, with consultation from the TD if needed, will develop an informal plan to target the skill for growth. The strategies will be described in the quarterly narrative and may include such things as 1) extra readings or additional academic coursework, 2) change in the format, emphasis and/or focus of supervision (e.g., supervisor modeling, co-delivery of services, real-time supervision, increased opportunities for practice) or 3) reduction of the intern's clinical or other professional duties. This level of focus on isolated skills is not uncommon in the early months of the internship and should not be cause for alarm.

The process of developing an Informal Response will occur in the event that an intern is rated "Not able to perform activity satisfactorily" on the mid-year evaluation. Supervisors who rate an intern below this level on one of the objectives will indicate how competency will be facilitated (more, closer supervision, additional guided practice, etc). Because the plan is being developed in response to the mid-point evaluation, the informal response may carry with it an additional sense of urgency to address the area of weakness in a timely fashion.

By the end of the training year, it is expected that interns will have reached a rating of "Acceptable and typical level of performance." If an intern is rated below this level, the supervisor will submit to the TD a narrative justifying the intern's successful completion of the program despite having not achieved acceptable and typical performance on one of the objectives or work products.

**B. Remediation Plan** (within 1 week following an Informal Response). If, however, before, during, or after an Informal Response occurs, the TC suspects that the skill deficit is so great or there are so many skills that are substantially weaker than expected that the intern may be in jeopardy of unsatisfactory completion of the internship, they will develop a Remediation Plan. During a remediation period, the TC and TD actively and systematically monitor, for a specific length of time, the degree to which the intern's performance improves. The Remediation Plan is a written document that includes (a) the behaviors associated with the inadequate rating; (b) specific recommendations for remediation (e.g., the same strategies used in developing the Informal Plan); (c) the time frame during which the weakness is expected to be addressed, and (d) the procedures designed to ascertain whether the weakness has been adequately remediated. Typically, the internship template is modified for use as a Remediation Plan and the specific objectives become the primary focus of the training experience. It is not uncommon for the TC to alter substantially the intern's training activities so that intensive support can be provided for the intern's

development in the area of concern. The TD and one or more of the members of the TC meet with the intern to review the remediation conditions. The intern is invited to raise any differences of perception or concerns with the plan as presented. When a Remediation Plan is developed, the TD will inform the intern's home university and provide a copy of the Plan. The intern shall receive a copy of the letter.

Once a Remediation Plan is developed by the TC, 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 remediation, no later than the time limits identified in the remediation statement (typically includes frequent monitoring, evaluation, feedback to monitor performance and development). If the rating has been rectified to the satisfaction of the TC, the intern, graduate program, and other appropriate individuals will be informed and no further action will be taken.

If the TC determines that there has not been sufficient improvement in the intern's behavior to remove the inadequate rating under the conditions stipulated in the Remediation Plan, the TC will communicate, in writing, to the intern that the conditions for revoking the remediation have not been met. The TC may then adopt one of the following methods. It may issue a:

- a) continuation of the remediation for a specified time period.
- b) decision to develop a probationary plan.
- c) official notice which informs the intern that the TC intends to terminate the intern immediately from the internship program.

**C. Probationary Plan** (within 2 weeks following the expiration of the Remediation Plan period). Some criteria which may guide the TC's decision to develop a Probationary Plan rather than extend the remediation period are: 1) the trainee's behavior does not change to the degree expected as a function of feedback, remediation efforts, and/or time, and 2) the skill deficits are so severe and pervasive there there is concern that they will not be remediated prior to the end of the training year. The procedures for a Probationary Plan are identical to those described above for a remediation plan.

**D. Termination.** Some criteria which may guide the TC's decision to terminate are: 1) the intern does not acknowledge, understand, or address the concern when it is identified 2) the quality of the intern's service delivery is negatively affected and may be considered unhelpful or detrimental to clients 3) the trainee's behavior does not change as a function of feedback, remediation efforts, and/or time, 4) the skill deficits are severe and pervasive, 5) multiple and similar observations are made by more than one supervisor.

### **Intern Violation**

In extremely rare circumstances, an intern will engage in an act that violates professional ethical standards and regulations, Site policies and procedures, and/or state/federal law such that their behavior infringes on the rights, privileges, or responsibilities of others. Any individual can raise a concern regarding an intern violation. The TD will investigate the matter and review the concern with members of the TC. When possible, concerns are

addressed within the context of the normal evaluation procedures. However, if the behavior warrants immediate action, the TC may:

- Attempt to rectify the situation
- Report the violation to the appropriate authorities
- Take disciplinary action up to and including termination from the program

## **Due Process Procedures**

**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 interns so they may challenge the program's action. General due process guidelines include the following:

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.

## Procedures to Respond to Problematic Performance

Feedback will be provided to the trainees during weekly supervision and through semi-annual written evaluations of trainee performance. If significant concerns about a trainee's performance are identified, the trainee will be formally notified in writing (within 1 week of the significant concern being identified) of the specific problem areas noted by the internship supervisor.

- a. Definition of Problematic Performance: Problem behaviors are said to be present when supervisors perceive that a trainee's behavior, attitude, or characteristics are disrupting the quality of the trainee's clinical services; the trainee's relationship with peers, supervisors, or other staff; or the trainee's ability to comply with appropriate standards of professional behavior. To be sure, among professionals in training, some problem behaviors may arise. It is a matter of professional judgment as to when such behaviors are serious enough to constitute "problematic performance."
- b. Problem behaviors typically become identified as problematic when they include one or more of the following characteristics:
  - i. The trainee does not acknowledge, understand, or address the problem when it is identified;
  - ii. The problem is not merely a reflection of a skill deficit, which can be rectified by academic or didactic training;
  - iii. The quality of services delivered by the trainee is significantly negatively affected;
  - iv. The problem is not restricted to one area of professional functioning;
  - v. A disproportionate amount of attention by training personnel is required;
  - vi. The trainee's behavior does not change as a function of feedback, remediation, efforts, and/or time;
  - vii. The problematic behavior has potential for ethical and legal ramifications if not addressed;
  - viii. The intern's behavior negatively impacts the public view of the agency;
  - ix. The problematic behavior negatively impacts the intern cohort;
  - x. The problematic behavior potentially causes harm to a patient/student; and/or
  - xi. The problematic behavior violates appropriate interpersonal communication with agency staff.

## Termination Procedures

**Notice of Intent to Terminate.** The intern is informed in writing that the TC has determined that the intern's training experience should be terminated and the date of termination, at which time the stipend ceases.

Within five (5) working days of receipt of the TC's Notice, the intern may respond to the TC's action by (a) accepting the action and, therefore, waiving the right to both hearing and appeal, or (b) participating in a hearing.

If the intern chooses to participate in a hearing, the intern must provide the TD, within 10 days, with information in writing as to why the intern believes the TC's action is unwarranted. A lack of reasons by the intern will be interpreted as accepting the action.

**Intern Hearing.** Within seven (7) working days of the Notice of the Intent to Terminate, the Intern Hearing will involve the TD, the TC, the intern, and an intern advocate. The intern retains the right to hear all facts with the opportunity to dispute or explain his/her behavior. A hearing will be conducted, chaired by the TD, in which the relevant information is presented by the intern with assistance from the intern advocate. Within five (5) days of the completion of the hearing, the TC and TD shall determine whether the information provided by the intern is sufficient to suggest that 1) the intern's progress/behavior can be corrected and 2) successful completion of the internship is possible. When the decision is overturned, the TC will develop a Remediation Plan and continue efforts to move the intern toward successful completion of the program, the stipend will be reinstated, and the TC will communicate its recommendation to the intern. When the decision is upheld, the intern, graduate program, and other appropriate individuals will be informed in writing of the intent to terminate.

**Appeals.** Within five (5) working days of receipt of the outcome of the hearing, the intern may respond to the action by (a) accepting the action and, therefore, waiving the right to appeal, or (b) appealing the decision on the basis of substance or procedure. If an intern chooses to appeal, they must prepare a summary of their basis for appealing the decision (substance or procedure), and submit to the TD within five working days of receiving the outcome of the hearing.

**Appeal Board.** All documents associated with the intern's behavior/progress are submitted to three members of the SB-PIC Executive Committee. Within seven (7) working days, each member reviews the documents separately and subsequently conferences regarding the decision of the TC. When the AB Appeal Board overturns the decision to terminate based on substance and/or procedure, the TC will be charged with developing an additional Remediation or Probationary Plan and the stipend will be reinstated. When the Appeal Board determines that the decision to terminate is an appropriate course of action, the intern, graduate program, and other appropriate individuals, including but not limited to, the Chair of APPIC and any relevant professional credentialing bodies, will be informed in writing that the intern is terminated from the program.

## Grievance Procedures

In order to protect the needs and rights of all interns, a formal grievance procedure has been developed for any situation not associated with the Evaluation Procedures. While it is hoped that any concerns or complaints can be discussed and resolved informally, a formal mechanism is appropriate in light of the power differential between supervisory staff and interns. In general, interns are encouraged to work actively to create training experiences that fit their needs and interests and to work with SB-PIC to ensure that their needs are met. Giving feedback (both positive and negative) to supervisors or the TD is encouraged and welcomed.

It is not uncommon during the internship year for interns to experience dissatisfaction with the behavior of their supervisors, other Site staff, other interns, or the Training Director. The vast majority of these concerns, when raised, are satisfactorily resolved. When such a situation arises, the intern is encouraged to first speak directly with the person of concern for a resolution. If the situation is not resolved, or if the intern prefers not to speak directly to the staff member/supervisor, the intern may discuss the concern with a supervisor and/or Training Director. An Interns' Concerns Committee exists to assist interns in resolving conflicts as well. In the event that the intern has a conflict with the Training Director, the intern can contact the chair of the committee directly to discuss the concern. On some occasions, informal communication or reminders to all supervisors or interns can ameliorate minor concerns. In many cases, the TD, Intern Concerns Committee Chair, or supervisor can provide suggestions or feedback that allows the intern to resolve the concern independently, and the matter is kept in confidence. If the intern is not comfortable addressing the situation alone, the Training Director, supervisor, or Committee Chair will then facilitate a meeting between the intern and the person of concern. In the case of a concern regarding an employee of the Site who is not involved with SB-PIC, the supervisor and/or Internship Training Director will consult with the Director of the Site, who may then take the lead in facilitating a meeting between the intern and that employee. In some cases, several meetings are held as progress is made toward resolution. The TD may consult with members of the SB-PIC Executive Committee in assisting interns in resolving difficulties. The TD may also utilize the APPIC Informal Problem Consultation service as needed.

**Formal Grievance.** If the concern is not resolved in the meeting(s) with the intern, supervisor, TD and/or Committee Chair, the intern will submit a formal grievance in writing. Within seven (7) days of receiving the formal written grievance in writing, the TD will convene an Advisory Committee to deliberate the formal grievance. The Advisory Committee will include the individuals already involved in addition to members of the Interns' Concerns and Development Committees and an intern advocate selected by the intern if the intern chooses (often one of the Intern Representatives). The committee will outline a course of action. A written summary of the plan will be distributed by the TD to all parties within seven (7) days. The decision will be communicated to the full Executive Board at its next meeting and provided to appropriate external agencies.