

University of Houston-Clear Lake Counseling and Mental Health Center

EXPECTATIONS, EVALUATION, DUE PROCESS, AND GRIEVANCE PROCEDURES FOR PSYCHOLOGY INTERNS

RESPONSIBILITIES OF THE TRAINING PROGRAM

Throughout the internship year, the training program is responsible for continually assessing the intern's performance and providing her/him with ongoing feedback in both formal and informal ways. Feedback is provided in order to facilitate the professional and personal growth of the intern and to assist the intern in improving skills and addressing deficits or problem areas. The training program takes very seriously its responsibility to monitor an intern's skills, competencies, and personal/professional functioning in order to protect clients, the agency, the profession, and the intern. It is also particularly important that there exist ongoing contact and close working relationships between graduate and internship programs so that evaluation guidelines and procedures can be implemented in a way which maximizes intern growth and development.

Interns have the right to be treated with courtesy and respect. They have the right to an environment that is free of exploitation, sexual harassment, arbitrary, capricious, or discriminatory treatment, unfair evaluation practices, and inappropriate or inadequate supervision or training experiences.

Interns have a right to clear statements of the standards and expectations by which they will be evaluated during the internship year. Information regarding interns' roles and responsibilities during the internship year, required skills and competencies, expectations for professional functioning, and requirements to successfully complete the internship are provided during the August Orientation and Training activities.

Interns have opportunities to provide input, raise concerns, and suggest changes and modifications to the training program. The Training Director will meet regularly with the interns in order to facilitate open communication about their training experiences. Interns may also request to meet with the Training Committee, the Director, and/or any agency administrator or staff member in order to discuss problems or concerns in relationship to these responsibilities.

As employees of the University of Houston-Clear Lake, psychology interns are entitled to the same rights as are afforded to other employees of the university. They have the right to activate a formal review when they believe that their rights have been violated (see section "Intern Grievance Procedures," below). Whenever there is a conflict between the due process procedures of Counseling and Mental Health Center (CMHC) and those of the university, the latter will take precedence. UHCL Policies can be found on the Human Resources webpage: <https://www.uhcl.edu/policies/administrative-policies-procedures/>

INTERN GRIEVANCE PROCEDURES

In resolving conflicts, CMHC works collectively and collaboratively to solve any problem that arises. Respectful and effective conflict resolution is an important professional skill. In the event of a concern or conflict, interns are expected to be respectful and cooperative in resolving these conflicts.

Counseling and Mental Health Center Internal Grievance Procedures

1. Interns should make every effort to resolve their complaints informally and directly with the person who is the subject of the complaint.
2. If resolution is not possible directly with the person who is the subject of the complaint, interns are then expected to discuss the situation with the Training Director (or the Director, if the Training Director is the subject of the complaint). Discussion with the Training Director may result in mediation or other processes being implemented as an initial course of action to assist in resolving the complaint.
3. If the intern wishes to file a formal complaint, then this will need to be submitted in writing to the Training Director with sufficient details describing the nature of the alleged infractions. The Training Director will then engage in fact-finding, with the assistance of the training committee. The training committee will have fifteen working days from the date of the written complaint to issue its recommendations.
4. If the intern wishes to appeal the Training Committee's decision, then he or she must file a letter addressed to the Director within five working days of receiving the decision. The Director will have the option of upholding the Training Committee's decision as being final; or the Director may then implement his or her own fact finding procedures, with up to fifteen working days to respond with a decision. The Director's decision will be final within the agency.

THE TRAINING PROGRAM'S EXPECTATIONS OF PSYCHOLOGY INTERNS

The training program's expectations of psychology interns fall into two broad categories: (1) skills and competencies, and (2) professional standards and functioning.

Skills and Competencies

- Psychology interns are expected to learn and demonstrate a broad range of psychological skills and competencies, as well as extensive self-examination focusing on their intra- and interpersonal processes. The skills and competencies that are required of interns are articulated in the training manual.
- Interns are expected to continually assess their own skill levels, training needs, and professional functioning; to set specific goals in cooperation with the training staff; and to notify their supervisors and/or Training Director promptly when aware of significant deficits in their functioning.

Professional Standards and Functioning

With regard to intern behavior and performance during the internship year, the general expectations of the training program are that the intern will:

- Practice within the bounds of the APA *Ethical Principles of Psychologists and Code of Conduct*

- Practice within the bounds of federal and state laws and regulations including those of the Texas State Board of Examiners of Psychologists and of the Board of Regents of The University of Houston System
- Practice in a manner that conforms to the professional standards of The University of Houston-Clear Lake and CMHC
- Maintain standards of conduct appropriate to their work environment as mandated for all employees of UHCL.

Interns are expected to adhere to CMHC policies and procedures including, but not limited to:

- Maintaining required professional records
- Being punctual, accounting for absences, and meeting obligations to clients and staff members
- Assuming appropriate responsibility for the smooth functioning of the agency

Functioning in a professional manner includes, but is not limited to:

- Balancing agency needs with personal needs
- Managing personal stress and monitoring commitments, avoiding or correcting overcommitment
- Making appropriate use of supervision, seminars, and other opportunities for learning; i.e., being on time and prepared to take full advantage of learning opportunities, as well as maintaining an openness to learning and being able to accept and use constructive feedback
- Maintaining appropriate interactions with peers, colleagues, staff, and other interns
- Using appropriate professional communication when participating in meetings and staff development activities
- Using appropriate channels of communication to resolve differences and/or conflicts, as laid out in this document
- Being alert to adjustment problems or emotional responses that may interfere with professional functioning

EVALUATION PROCEDURES FOR PSYCHOLOGY INTERNS

Evaluation is an ongoing formal and informal process. The training committee expects all staff who participate in training and supervision — all supervisors, including the individual supervisor, group co-leader/supervisor, seminar leaders, outreach coordinator, and workshop co-presenters/supervisors — to provide direct and ongoing feedback to interns.

Formal evaluation occurs in two ways. At mid-semester in the Fall and Spring, the training staff meets to discuss each intern's progress, in preparation for providing feedback directly to the intern. Interns then meet with each of their primary supervisors to receive and discuss the feedback about their progress. At the end of the Fall semester, each supervisor provides comprehensive feedback, both orally and in writing, to each intern. This evaluation process is repeated again at the end of the spring semester and again at the end of intern year.

Interns provide oral feedback at mid-semester and written evaluative feedback at the end of the semesters regarding the performance of their clinical supervisors, seminar leaders, and

group co-leaders. Interns meet periodically with the Training Director to provide ongoing feedback regarding the internship program.

General evaluation of the training program by both interns and training staff occurs on an ongoing basis through supervisory relationships, meetings with the Training Director, and through the regularly scheduled meetings of the training team staff. Interns provide written evaluations of all seminars throughout the year. Upon completion of the training experience, interns are expected to complete and review with the Training Director a written evaluation of the internship program that addresses supervision, seminars, and the overall structure and format of the training program.

MINIMUM PASSING REQUIREMENTS FOR PSYCHOLOGY INTERNS

In order to successfully pass the internship, *all* of the following requirements must be met:

1. The intern must satisfactorily attend and complete all required service and training activities, and have completed a sufficient number of hours to qualify for a one-year, full-time internship experience. Interns must complete 2000 hours on site, 500 in direct service.
2. The intern must receive a competency rating of 7-8 (“Doctoral practice/Completion of internship”) on all competency elements by the final (end of year) evaluation. Any intern who receives a rating of 1 (“Remediation”) or 2-3 (“Beginning Internship Practice”) at the mid-year point will have a written plan in place to help them meet the standards by the end of the internship year.
3. In the judgment of the Training Director and Training Committee, the intern has met all of the requirements and expectations outlined under “Professional Standards and Functioning,” described above.

DUE PROCESS PROCEDURES FOR PSYCHOLOGY INTERNS

Interns will receive feedback regularly from staff and supervisors about their performance. Feedback is a normal part of a training experience, designed to support learning from mistakes as well as successes. The following section outlines procedures that will be followed only in cases of inadequate or unacceptable intern performance.

Definition of Inadequate or Unacceptable Performance

For the purposes of these policies and procedures, *inadequate* or *unacceptable* intern performance is defined broadly as interference in professional functioning that is reflected in one or more of the following ways:

- (a) Failure to acquire and integrate professional behaviors and ethical standards;
- (b) Failure to acquire the level of professional skills necessary to reach an acceptable level of competency;
- (c) Failure to manage personal stress, psychological problems, and/or excessive emotional reactions.

Some situations of inadequate or unacceptable intern performance can be successfully addressed through a remediation plan, while other such situations cannot. The ultimate success of a remediation plan is considered less likely when one or more of the following characteristics are present:

1. The intern does not acknowledge and/or successfully address the problem when it is identified.
2. The problem is not a skill deficit that can be rectified by further academic or didactic training.
3. The quality of the intern's service delivery is negatively affected and may be considered to be destructive to clients.
4. The problem is not restricted to one area of professional functioning.
5. A disproportionate amount of attention by training personnel is required, compared to other interns in the group at the same training level.
6. The intern's behavior does not change as a function of feedback, remediation efforts, and/or time.

The Training Committee will consider the number and severity of the characteristics noted above when determining the nature and extent of actions taken.

General Guidelines for Due Process

Due process insures that judgments or decisions made by the internship program about interns are not arbitrary, capricious, or personally biased. The training program has adopted specific evaluation procedures that are applied to all interns. The appeals procedures presented below are available to the intern so that he/she may challenge the program's actions.

General due process guidelines include:

1. Presenting to interns, in writing, the program's expectations in regards to professional functioning at the outset of training (as outlined in this document)
2. Stipulating the procedures for evaluation, including when, how, and by whom evaluations will be conducted
3. Using input from multiple sources when making decisions or recommendations regarding the intern's performance
4. Articulating the various procedures and actions involved in making decisions regarding inadequate or unacceptable behavior
5. Communicating early and often with graduate programs about any suspected difficulties with interns
6. Instituting, with the input and knowledge of the intern's graduate program, a remediation plan for identified inadequacies, including a time frame for expected remediation and consequences if inadequacies are not rectified
7. Providing the intern with a written statement of procedural policy describing how the intern may appeal the program's actions or decisions
8. Insuring that interns have a reasonable amount of time to respond to any action(s) taken by the program
9. Documenting in writing and to all relevant parties (e.g., the intern's academic advisor or training coordinator, internship supervisor), the action(s) taken by the program and the rationale.

Procedures

The following procedures are followed in cases of inadequate or unacceptable intern performance:

- I. *A Problem is Recognized:* A problem affecting intern performance may be identified either through formal evaluation procedures or through the informal interactions of supervisors and other training staff working with intern. Such problems can usually be categorized as issues of (1) competence/skill deficit, (2) professional/ethical behavior, and/or (3) psychological maladjustment.
- II. *The Problem is Brought to the Attention of the Training Director:* If the Training Director does not already have knowledge of the intern's problematic behavior as a result of evaluation procedures, the staff member(s) recognizing the problem will bring it to the attention of the Training Director. The Training Director will then review the problem and may elect to consult with the Training Committee and/or other staff as appropriate. The Training Director will meet with the intern to obtain any information or statements from the intern related to the identified concern. The Training Director at this point may decide to implement a remediation plan if the problem is sufficiently defined and is of a minor nature.
- III. *The Problem is Brought to Attention of the Training Committee:* The Training Director will bring the concerns about the intern to the attention of the Training Committee for consultation particularly in cases where the problem requires further definition and/or is of moderate to serious concern.
- IV. *The Problem is Defined and Reviewed by the Training Committee:* The Training Committee will assist the Training Director to define the intern's problem as concretely and behaviorally as possible. At this point, the Training Committee will discuss the problem, decide on the severity, and assess the potential for remediation. Based on this determination, the Training Committee will recommend to the Training Director one of the following actions (see "Recommended Actions," below): (a) determination that the problem is not severe enough to warrant remediation, (b) generation of a remediation plan without probation, (c) placement of the intern on probationary status with a remediation plan in place, or (d) termination of the intern. In the case of probation, remediation, or termination, the intern, the intern's academic program, and other relevant persons will be notified in writing. Furthermore, as deemed necessary by the Training Director, the intern's academic program may be consulted or notified at any time regarding concerns about the intern's performance.

Recommended Actions

Possible recommended courses of action from the Training Committee are as follows:

- I. *Documented Discussion of Concern:* This would be used for fairly minor concerns, where the training committee believes that offering direct feedback about the concern and desired change in behavior would effect the necessary changes, and that a formal remediation plan is not deemed necessary. In this case, the Training Director or a designated senior staff member will meet with the intern to discuss the problem and desired resolution. A brief note documenting the concern and discussion meeting will be placed in the intern's training file, but no documentation is sent to the intern's academic program at this time. If the problem is not immediately and successfully resolved with oral discussion, the training committee will discuss whether to generate a formal remediation plan.
- II. *Remediation Plan is Generated Without Probation:* If termination or probation is not deemed appropriate, the Training Committee will generate an appropriate plan of remediation. This will be written up by the Training Director, discussed with the

intern, and signed by both parties. The training director will also communicate with the intern's academic program, and provide the director of clinical training for the academic program a copy of the remediation plan. The remediation plan should include:

1. A clear explanation of the behaviors which need to be changed.
2. The stipulations and plan for remediating the problem. Several possible, and perhaps concurrent, courses of action designed to remediate deficiencies may include (but are not limited to): increasing supervision with the primary supervisor or changing the primary supervisor; changing the format, emphasis, and/or focus of supervision; recommending a psychological assessment and/or personal therapy (and clarifying to all parties involved whether or not the assessment and therapy contacts will be used in the intern evaluation process, and if so, how they will be used); reducing or limiting the type of direct client contact or other internship responsibilities; requiring specific academic coursework; or recommending, when appropriate, a leave of absence (or a second internship in the case of interns).
3. The time period during which the problem is expected to be ameliorated
4. The procedures designed to evaluate whether or not the problem has been appropriately rectified.

III. *Probation (with remediation plan)*: Probationary status is defined as a situation where the intern is actively and systematically monitored by supervisors and the Training Director for a specific length of time regarding the necessary and expected changes in the problematic behavior. Those monitoring the intern will be asked to communicate frequently with the Training Director throughout the probationary period. The intern is given a written statement notifying him/her of the probationary status and specifying:

1. A clear explanation of the behaviors which need to be changed.
2. The stipulations and plan for remediating the problem (see notes about remediation plan above)
3. The time period of the probation during which the problem is expected to be ameliorated
4. The procedures designed to evaluate whether or not the problem has been appropriately rectified

Following the intern's written notification of his/her probationary status, the Training Director will then meet with the intern to review the probationary conditions. The intern may then choose to accept the conditions of the probation or to challenge the action. (The procedures for appealing the action are presented in a subsequent section.) If the action is not challenged by the intern, the remediation plan is put into action. The training director will also communicate with the intern's academic program, and notify the director of clinical training for the academic program of the intern's probation status and provide a copy of the remediation plan.

IV. *Termination is Recommended*: Termination *at this point in the process* would be recommended only in extreme circumstances. Examples of such circumstances are acts of physical aggression against a staff member or a client, or serious ethical misconduct. The intern's academic program will be notified of the termination in writing. After the intern is notified in writing of the Training Committee's recommendations, he/she may choose to appeal the decision as outlined in the Process of Appeal.

Outcomes of Recommended Actions

- I. At the end of the specified time period in the remediation plan, the training committee will meet to decide whether or not sufficient positive change has occurred.
 - A. *Sufficient Positive Change*: Both the monitors and the Training Committee are satisfied that sufficient positive change has taken place.
 1. *End of Remediation Plan / Probation*: The intern is formally notified, in writing, that satisfactory change has been accomplished and the monitoring period is ended.
 2. *Letter to Academic Department*: If the intern was on probation or a remediation plan, the intern's academic program will be notified that probationary status has been lifted and that the remediation plan was successfully completed.
 - B. *Insufficient Positive Change*: At the end of the probationary period, the monitors and the Training Committee determine that insufficient positive change has taken place. The Training Committee then reviews the situation and may recommend one of the following:
 1. *Probation with a New Remediation Plan*: The Training Committee does not feel that a recommendation of termination is appropriate at this time. The intern is placed on/remains on probation with a new time period specified. The intern may challenge this recommendation or may accept the new remediation plan. A new plan for remediation is generated in another effort to promote change. In addition to what is described above, this plan may include psychological/psychiatric treatment, careful screening of clients, closer and more intense supervision, suspension of certain activities, etc. The intern's supervisors and the Training Director work with the intern to facilitate and monitor change. Communication by those monitoring the intern to the Training Committee will be frequent and on a regular basis throughout the probationary time period specified.
 2. *Termination Recommended*: The Training Committee, after reviewing the problem, concludes that it is both serious and resistant to change; on this basis, termination is recommended. Again, at this point the intern may choose to challenge the decision according to the appeal procedures outlined below.
- II. After an intern has been on probation twice for the same or related difficulties without sufficient positive change, the Training Committee then reviews the situation and may recommend one of the following:
 1. Giving the intern a limited endorsement which includes specification of settings and conditions in which the intern can function adequately or, conversely, specifying those which should be avoided.
 2. Communicating to the intern and his/her academic program that the practicum/internship has not been successfully completed, and recommending a leave of absence or a second practicum/internship at a later date.
 3. Recommending and helping to implement a career change for the intern.
 4. Terminating the intern from the training program.

All of the above actions will be appropriately documented and implemented in a manner consistent with due process procedures. The intern is notified of the final decision and, again,

at this point may appeal the decision. If the intern accepts the decision, his/her academic program and other appropriate individuals are notified in writing. If the intern chooses to appeal, these individuals will be notified of the final decision at the conclusion of the appeal process in writing.

PROCEDURES FOR APPEAL

Within five working days of the communications of (1) inadequate or unacceptable performance, (2) remediation plan by the Training Committee, (3) probationary status, or (4) termination, an intern may submit a letter to the Training Director, requesting an appeal. An appeal may be requested on one or more of the following grounds:

1. Alleged denial of the described due process granted to the intern in any part of the evaluation procedure
2. Alleged denial of the opportunity to fairly present data to refute criticisms in the evaluation.
3. Disagreement with the evaluations of one or more evaluators.

If an intern submits an appeal, the training director will ask the Director to review the decision within five working days. The director will then implement his or her own fact finding procedures, seeking consultation as needed, and will have up to fifteen working days to respond with a decision. The Director's decision is final within CMHC. The intern may, however, appeal the decision in writing to the Vice President for Student Affairs who will implement his/her own review process.

By my signature, I acknowledge receiving a copy of the UHCL Counseling and Mental Health Center Expectations, Evaluation, Due Process, and Grievance Procedures document.

Intern's Printed Name

Intern's Signature

Date