

The Pre-Doctoral Internship in Professional Psychology at  
Berea Children's Home and Family Services

DUE PROCESS GUIDELINES

DEFINITION OF PROBLEM

For purposes of this document pre-doctoral intern problem is defined broadly as an interference in professional functioning that 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.
3. An inability to control personal stress, psychological dysfunctions, and/or excessive emotional reactions, which interfere with professional; functioning.

While professional judgment determines when a pre-doctoral intern's behavior becomes more serious (i.e. problematic) rather than just of concern, for purposes of this document a concern refers to a pre-doctoral intern's 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 that 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 pre-doctoral intern'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 pre-doctoral intern's behavior negatively affects the public view of the agency.
9. The problematic behavior negatively affects the intern class.

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GENERAL GUIDELINES FOR INTERN & TRAINING PROGRAM REQUIREMENTS

The Pre-Doctoral Internship in Professional Psychology is designed as a general internship and is seen as a component of the doctoral training process in clinical, counseling, and/or school psychology. Broadly, the internship aims to provide the pre-doctoral intern with the opportunity (in terms of setting, experience and supervision) to begin assuming the professional role of a psychologist consistent with the local clinical scientist model. This model entails objective observation, participant observation, subjective observation, and self-observation to further the development of professional, clinical, scientific, and ethical aspects of professional functioning.

I. Training Program's Expectation of Pre-Doctoral Interns

The expectations of pre-doctoral interns are divided into three areas

1. Knowledge of and conformity to relevant professional standards
2. Acquisition of appropriate professional skills
3. Appropriate management of personal concerns and issues as they relate to professional functioning.

Each of the areas is described below:

A. Professional Standards

Pre-doctoral 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 that 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 document include but are not necessarily limited to the Ohio State Board of Psychology document on psychology law based on relevant Ohio revised Code and Ohio Administrative Code.

The training program recognized that mere knowledge of and exposure to the above guideline and standards is not sufficient. Interns need to demonstrate the ability to integrate and 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, pre-doctoral interns are expected to:

1. Achieve competency in providing psychotherapeutic services (individual, family and group) to children adolescents, and families of differing cognitive capacities, diagnostic categories, and cultural and socioeconomic backgrounds. Achieve competence in case conceptualization, treatment planning, and assessment and management of client risk.
2. Achieve competency in the administration, interpretation, integration and reporting of psychological test battery data. Demonstrate a thorough working knowledge of psychiatric diagnostic nomenclature and DSM multi-axial classification as related to clients with a range of age, cognitive ability, symptomatology, behavioral disturbance, ethnicity, and socio-economic status.
3. Achieve competency in the utilization of the guidelines for multicultural education and training established by the American Psychological Association as a backdrop for individual and group work. Demonstrate openness to exploring one's own cultural identity issues. Achieve competency in delivery of culturally sensitive psychological services.
4. Achieve competency in gathering clinical and research information to enhance clinical knowledge and individualize client care.
5. Achieve competency in the development of collaborative interactions this professional of different disciplines and training backgrounds. This includes the area of case consultation. Demonstrate an ability to selectively and appropriately act as an effective leader.
6. Achieve competence in seeking supervision when indicated, displaying appropriate interpersonal boundaries, completing required paperwork in a timely fashion, and displaying efficient and effective time management skills. Demonstrate increased understanding of, and conformance to, legal and ethical standards in clinical practice as outlined according to the Ohio State Board of Psychology and the American Psychological Association ethics code.

The above competency expectations imply that pre-doctoral interns will be making adequate progress in the above areas (as assessed by periodic evaluations) and that pre-doctoral 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

The training program recognizes 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 a pre-doctoral intern's professional work. Such problems include but are not limited to: educational or academic deficiencies, psychological adjustment problems and/or inappropriate emotional responses, inappropriate management of personal stress, inadequate level of self-directed professional development, and inappropriate use of and/or response to supervision.

When such problems significantly interfere with a pre-doctoral intern's professional functioning, such problems will be communicated in writing to the pre-doctoral intern. The training program, in conjunction with the pre-doctoral intern, will formulate strategies for ameliorating such problems and will implement such strategies and procedures. If such attempts do not restore the pre-doctoral intern to an acceptable level of professional functioning with a reasonable period of time, discontinuation in the program may result. The specific procedures employed for the acknowledgment and amelioration of pre-doctoral intern deficiencies will be described later in this document.

## II. General Responsibilities of the Intern Program

A major focus of pre-doctoral 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 a pre-doctoral intern can meaningfully explore personal issues which relate to his/her professional functioning. In response to the above pre-doctoral intern expectations, the training program assumes a number of general responsibilities. The responsibilities correspond the three general expectation areas (Professional Standards, Professional Competency, and Personal Functioning) and are described below:

### A. The Training Program

1. The training program will provide pre-doctoral 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 pre-doctoral interns with information regarding relevant legal regulations that 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 pre-doctoral intern's progress with the timing and content of such evaluations designed to facilitate interns' change and growth as professionals. Evaluations will address the intern's 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 ongoing communications with the pre-doctoral intern's graduate department regarding the intern's progress during the internship year. The training program will provide appropriate mechanisms by which inappropriate pre-doctoral intern behavior effecting professional functioning is brought to the attention of the intern. The training program will also maintain pre-doctoral procedures, including grievance and due process guidelines, to address and remediate perceived problems as they relate to professional standards, professional competency, and/or professional functioning.

## PRE-DOCTORAL INTERN EVALUATION, REVIEW, AND DUE PROCESS PROCEDURES

### I. The Evaluation Process

Pre-doctoral interns are evaluated and given feedback throughout the year by their individual supervisors in both formal and informal settings. Additionally, at the four month and eight month points, the entire faculty evaluates pre-doctoral interns' performance and makes recommendations for the remaining internship as well as future needs the intern may experience. The Trainee Evaluation Form is completed by faculty members at the four month, eight, and twelve month points and then given to the Training Director. The Training Director, at the three times of the internship year, meets with the pre-doctoral interns individually, gives them a full report of the evaluation of their performance, and makes those recommendations and suggestions that are relevant.

Thus, the Training Director utilizes information from all supervisors; his/her own impressions, and those of others who have had significant contact with the pre-doctoral intern. This process is viewed as an opportunity for the Training Director to provide integrative feedback regarding the collective experience of others who have had significant interactions with the intern. Both parties discuss how the pre-doctoral 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. In the context of this meeting or at any point during the internship if a problem is identified, the Training Director and the intern may arrange for a modification of the pre-doctoral intern's training program to address his/her training needs and/or the needs of the training program.

During the course of the internship, the sponsoring university is kept informed of the pre-doctoral intern's training experience. The Training Director communicates formally with the sponsoring university twice a year regarding the intern's progress.

### II. Initial Procedures for Responding to Inadequate Performance by a Pre-Doctoral Intern (i.e. Pre-Doctoral Intern Problem)

If a pre-doctoral intern receives a rating of marginal from any of the evaluation sources, the following procedures will be initiated:

- A. The intern; supervisor will meet with the Training Director 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 marginal rating and the intern's response (if available), the Training Director may adopt any one or more of the following methods or may take any other appropriate action. He/she may issue:
  1. "Acknowledge Notice" is determined via consensus of the faculty. The notice is generally used for marginal ratings related to relatively minor violations of policies or procedures but still deserving of remediation. Examples include but are not limited to excessive absenteeism, documentation problems, and potential or minor ethical concerns. "Acknowledge Notice" formally acknowledges"

- a. The faculty is aware of and concerned with the rating.
  - b. The rating has been brought to the attention of the pre-doctoral intern.
  - c. The faculty will work with the intern to specify the steps necessary to rectify the problem or skill deficit addressed by the rating.
  - d. The behaviors associated with the rating are not significant enough to warrant serious action.
2. “Probation” which defines a relationship such that the faculty, through the supervisors and Training Director, actively and systematically monitor, for a specific length of time, the degree to which the pre-doctoral intern addresses, changes, and/or otherwise improves the behavior associated with the inadequate rating. Probation is generally reserved for more serious violations. Examples include but are not limited to potential legal issues, professional conduct problems, fraudulent documentation, and significant ethical concerns. Probation may also be used when an intern does not respond positively to an “Acknowledge Notice.” The probation is a written statement to the intern and includes:
    - a. The actual behaviors associated with the marginal 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.
    - d. The procedures designed to ascertain whether the problem has been appropriately rectified.
  3. “Take no further action”
- D. The Training Director will then meet with the pre-doctoral 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 Acknowledge Notice or the Probation occurs the Training Director will inform the pre-doctoral intern’s sponsoring university, indicating the nature of the marginal rating, the rationale for the action, and the action taken by the faculty. The intern shall receive a copy of the letter to the university.
  - F. Once the Acknowledge notice or Probation is issued by the Training Director, a performance improvement plan will be created. 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 pre-doctoral intern, sponsoring university and other appropriate individuals will be informed in writing, and no further action will be taken.

### III. Situations in which Grievance Procedures are Initiated

Grievance procedures can be initiated in three situations:

1. When the pre-doctoral intern challenges the action taken by the faculty (Intern Challenge).
2. When the faculty is not satisfied with the intern’s action in response to the action (Continuation of the Inadequate Rating).
3. 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 pre-doctoral intern challenges the action taken by the faculty as described in II above, he/she must within ten days of receipt of the decision, inform the Training Director, in writing, of such a challenge.
  1. The Training Director will then convene a Review Panel consisting of all faculty members except for the Chief Psychologist. 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 Training Director, in which the challenge is heard and the evidence presented. Within fifteen days of the completion of the review hearing, the Review Panel submits a written report to the Chief Psychologist, 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 five days of receipts of the recommendations, the Chief Psychologist will accept the Review Panels' action, reject eh Review Panel's action and provide an alternative, or refer the matter back to the Review Panel of further deliberation. The Review Panel then reports back to the Chief Psychologist within ten 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 pre-doctoral inter, sponsoring university, and other appropriate individuals are informed in writing of the action taken.
- B. Continuation of Marginal Rating. If the faculty determines that there has not been sufficient improvement in the pre-doctoral intern's behavior to remove the marginal rating under the conditions stipulated in the probation, then a formal Review Panel will be convened.
  1. The Training Director will communicate, in writing, to the pre-doctoral 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. The faculty may issue:
    - a. Continuation of the probation for a specific time period.
    - b. Suspension whereby the pre-doctoral intern is not allowed to continue engaging in certain professional activities until there s evidence that the behavior in question has improved.
    - c. Communication that informs the intern the Training Director is recommending to the chief Psychologist that the intern will not, if the behavior does not change, successfully complete the internship.
    - d. Communication that informs the intern that the Training Director is recommending to the chief Psychologist that the intern be terminated immediately from the internship program.
  2. Within five working days of receipt of this determination, the pre-doctoral intern may respond to the action by accepting the action or challenging the action.
  3. If a challenge is making, the pre-doctoral intern must provide the Training Director, within ten 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 pre-doctoral intern challenges the action, a Review Panel will be formed consisting of all faculty except for the Chief Psychologist.
  5. A Review Panel hearing will be conducted, chaired by the Training Director, in which the challenge is heard and the evidence presented. Within ten days of the completion of the review hearing, the Review Panel shall communicate its recommendation to the pre-doctoral intern and to the Chief Psychologist. Decisions by the Review Panel will be made by majority vote.
  6. Within five 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 Review Panel then reports back to the Chief Psychologist within ten days of the receipt of the Chief Psychologist's request of 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 pre-doctoral intern, sponsoring university, and other appropriate individuals are informed in writing of the action taken.
- C. Pre-Doctoral Intern Violation. Any faculty member may file, in writing, a grievance against a pre-doctoral intern for any of the following reasons: a) unethical or legal violation of professional standards or laws; b) professional misconduct detrimental to BCHFS and/or a client; or c) infringement on the rights, privileges, or responsibilities of others.
1. The Training Director will review the grievance with two members of the faculty 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 Training Director and other two members determine that the alleged behavior in the complaint, if proven, would not constitute a serious violation, the Training Director 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 the Training Director and the other two faculty members that there is probable cause for deliberation by the Review Panel, the Training Director shall notify the faculty member and request permission to inform the pre-doctoral 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 five days or permission to inform the intern is denied, the Training Director and the two members shall decide whether to proceed with the matter.
  4. If the pre-doctoral intern is informed, a Review Panel is convened consisting of all faculties except for the Chief Psychologist and the faculty filing the grievance. 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 Training Director in which the complaint is heard and the evidence presented. Within ten days of the completion of the review hearing, the Review Panel shall communicate its recommendation to

the pre-doctoral intern and to the Chief Psychologist. Decisions by the Review Panel shall be made by majority vote.

6. Within five days of receipt of the recommendation, the Chief Psychologist will 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 Review Panel then reports back to the chief Psychologist within ten 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 pre-doctoral interns raise a formal complaint or grievance about a superior, staff member, trainee, or program.

There may be situations in which the pre-doctoral intern has a complaint or grievance against a supervisor, staff member, their 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.
- C. If the Training Director cannot resolve the matter, the Training Director will choose an agreeable faculty member acceptable to the pre-doctoral intern who will attempt to mediate that 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 all faculty. The Review Panel will review all written materials (from the pre-doctoral inter, 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 pre-doctoral psychology intern with a means to resolve perceived conflicts that cannot be resolved by informal means. Interns who pursue grievance in good faith will not experience any adverse personal or professional consequences.

## REMEDATION CONSIDERATIONS

There needs to be meaningful ways to address a problem once it has been identified. Several possible and perhaps concurrent course of action designed to remediate problems include but are not limited to:

1. Increasing supervision, either with the same or different supervisor.
2. Changing 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 pre-doctoral intern's clinical or other workload and/or requiring specific academic coursework.
5. Recommending, when appropriate, a leave of absence and/or a second internship.

When a combination of the above interventions do not, after a reasonable time period, rectify the problem or when the pre-doctoral intern 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 pre-doctoral intern a limited endorsement, including the specifications of those settings in which he/she could function adequately.
2. Communicating to the intern and the sponsoring university 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.
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 pre-doctoral interns are not arbitrary or personally based, requires that programs identify specific evaluative procedures that are applied to all interns, 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 pre-doctoral interns, in writing, with the program's expectations related to professional functioning.
2. Stipulating the procedures of reevaluation, 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 a 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 of identified inadequacies, including a time frame for expected remediation and consequences of not rectifying the inadequacies.
6. Providing a written procedure to the pre-doctoral intern that 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 pre-doctoral intern's performance.
9. Documenting, in writing and to all relevant parties, the action taken by the program and its rationale.
10. Documenting, in writing, if the intern has satisfied the requirements of a performance improvement plan.

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Intern Remediation Plan

Pre-Doctoral Intern:

Date of Remediation Plan Meeting:

Primary Supervisor:

Additional Supervisors:

Date for follow-up meeting:

Circle all competency domains affected:

Theories and methods of Effective Psychotherapeutic Intervention

Theories and methods of Assessment and Diagnosis

Individual and Cultural Diversity

Scholarly Inquiry and Application of Current Scientific Knowledge to Practice

Inter-Professional Treatment Settings

Professional Conduct, Ethics, and Legal Matters

Other Competencies:

Description of the problem(s):

Date the problem(s) was first addressed with the pre-doctoral intern:

Steps or measures already taken by pre-doctoral intern to rectify the problem(s):

Steps or measure already taken by the supervisor(s) to rectify the problem(s):

Intern Remediation Plan Continued

<u>Competency Domain</u>	<u>Target Behavior(s)</u>	<u>Expectations for Acceptable Performance</u>	<u>Recommendations and Steps for Remediation</u>	<u>Supervisor's Responsibilities</u>	<u>Timeframe for Acceptable Performance</u>	<u>Consequences for Unsuccessful Remediation</u>

Intern Remediation Plan Continued

I, \_\_\_\_\_, have reviewed the above remediation plan with my primary supervisor, any additional supervisors, and the Training Director. My signature below indicates that I fully understand the above remediation plan. I agree/disagree with the above remediation plan (please circle one). My comments, if any, are below (*PLEASE NOTE: Comments are REQUIRED if the pre-doctoral intern disagrees with the plan*).

\_\_\_\_\_  
Pre-Doctoral Intern

\_\_\_\_\_  
Primary Supervisor

\_\_\_\_\_  
Training Director

\_\_\_\_\_  
Additional Supervisor

Pre-doctoral intern's comments (Feel free to use additional pages):

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My signature below indicates that I have read the Berea Children's Home and Family Services Pre-Doctoral Internship GRIEVANCE AND DUE PREOCESS GUIDELINES AND PROCEDURES, and I agree to abide by their contents.

\_\_\_\_\_  
Pre-Doctoral Intern Name (Printed)

\_\_\_\_\_  
Pre-Doctoral Intern Signature

\_\_\_\_\_  
Date

My signature below indicates that I am providing a waiver for the pre-doctoral internship faculty to disclose to the relevant State Board of Psychology, and/or by sponsoring university faculty information regarding the pre-doctoral internship faculty's determination of serious competence problems and/or ethical or legal violations on my part.

\_\_\_\_\_  
Pre-Doctoral Intern Name (Printed)

\_\_\_\_\_  
Pre-Doctoral Intern Signature

\_\_\_\_\_  
Date