



**Doctoral Internship Program in School Psychology  
August 2023 - June 2024**

**Due Process & Grievance Procedures**

**Due Process & Grievance Policy and Procedures**

WBES follows due process guidelines to inform and provide a framework to respond, act, or dispute. Due process ensures that decisions about interns are not arbitrary or personally based and occur stepwise, involving more significant levels of intervention as a problem increases in persistence, complexity, or disruption to the training program. Due Process procedures also protect intern rights and are implemented to afford the intern a reasonable opportunity to remediate problems and receive support and assistance. Interns have the right to appeal remediation decisions and to file a complaint (grievance) at any time during the internship about any element of the training program. The guidelines include appeal procedures that permit any intern to challenge program decisions.

***Due Process Guidelines***

1. Present interns with the program expectations regarding professional functioning at the start of the training year. This includes a specific review of evaluative procedures that occur at meaningful intervals. All expectations, due process, and grievance procedures will be provided in writing and reviewed as a group during the orientation,
2. Areas of concern and “problematic behavior” are defined,
3. WBES will communicate early and often with the intern’s graduate program about any difficulties and seek input from the program about how to address the difficulties,
4. Remediation plans will be provided for skill deficiencies or problematic behavior, including a time frame for remediation and the consequences of not rectifying the issue(s),

5. Interns are provided with a written description of Due Process procedures, including remediation and the handling of a grievance,
6. Interns have sufficient time to respond to any action taken by the program that affects them,
7. WBES seeks input from multiple professional sources, including the primary and secondary supervisor, when making decisions or recommendations regarding the intern's performance, and
8. All procedures will be documented, in writing and to all relevant parties, the action(s) taken and its (their) rationale.

### ***Defining Areas of Concern***

In the WBES psychology training program, areas of concern typically fall into one of two areas:

1. Skill deficiency: Skill deficiencies may include lack of doctoral-level training in
  - a) Psychological assessments;
  - b) Diagnostics;
  - c) Test administration or interpretation;
  - d) Report writing;
  - e) Forming therapeutic alliances with students;
  - f) Therapy/counseling; or
  - g) Knowledge of pertinent research or additional weaknesses such as:
    - i. Conducting professional activities beyond the intern's abilities or scope;
    - ii. Disregard for a supervisor's guidance; or
    - iii. Resistance to appropriate opportunities for learning.
2. Problematic Trainee Behavior: Behaviors are identified as problematic behaviors if they include one or more of the following characteristics:
  - a) The intern does not acknowledge, understand, or address the problem when it is identified;
  - b) The area of concern potentially causes harm to a student or identified client;
  - c) The problem is not merely a reflection of a skill deficit that can be rectified by academic or didactic training;
  - d) The quality of services delivered by the intern is sufficiently negatively affected.
  - e) The problem is not restricted to one area of professional functioning;

- f) A difficulty in acquiring and integrating professional standards into one's repertoire of professional behavior;
- g) A disproportionate amount of attention by training personnel is required;
- h) The intern's behavior does not change as a function of feedback, remediation efforts, and/or time;
- i) A difficulty in managing personal stress, psychological challenges, and/or excessive emotional reactions which interfere with professional functioning; or
- j) The behavior has potential for ethical violation(s) or legal ramifications if not addressed.

## **Procedures for Responding to a Skill Deficiency or Problematic Behavior**

### ***Informal Review & Resolution Procedures***

When a supervisor (the psychologist who provides direct supervision/teaching) believes that an intern's (trainee) behavior is becoming problematic, the first step in addressing the issue is to raise the issue with the intern directly and as soon as feasible to resolve the problem informally. This process is documented and may be discussed with the DCT, but it will not become part of the intern's professional file. Resolution may include increased supervision, didactic training, and/or structured readings. Trainees may exhibit behaviors, attitudes, or characteristics which, while of concern and requiring remediation, are not unexpected or excessive for professionals in training. Professional judgment is used in consultation by the DCT and supervisor as to when an issue becomes problematic rather than solely of concern. If an intern's problem behavior persists following an attempt to resolve the matter informally, a formal review process is initiated using guidelines that include an appeal procedure that permits any intern to challenge program decisions.

### ***Formal Review Procedures***

If the issues are not resolved, the intern continues reflecting a skill deficiency or problematic behavior, and the matter is not being adequately addressed through routine supervision and didactic training, the following procedure will be initiated unless it is determined that immediate disciplinary action is appropriate due to ethical responsibility and the severity of the concern. In some cases, speaking directly to the intern about these concerns may be appropriate. This decision is made at the discretion of the individual who has concerns. When an intern, supervisor, or other person informs the DCT that intern performance is insufficient and/or a problematic behavior has occurred, and informal review has not resolved the issue or is not appropriate or feasible, a formal review of the intern is activated:

1. **Written Notice:** The Intern will be notified in writing that an issue has been raised to a formal level of review, and that a hearing will be held. A Written Notice directs the intern

to discontinue unsatisfactory action(s) or behavior(s). The intern will be given a letter specifying the following:

- a) Notifying the intern that there is unsatisfactory behavior.
  - b) Description of the unsatisfactory behavior.
  - c) Actions required to correct the unsatisfactory behavior.
  - d) Timeline for correction with a minimum of 30 days.
  - e) Consequences if the problem is not corrected.
  - f) The DCT will review progress with the intern and relevant individuals at the end of the timeline. If the progress is insufficient, then the DCT will consult with the Training Committee to determine the next appropriate step. The DCT will provide the intern with a written statement detailing the intern's progress in relation to the remediation plan.
2. Hearing: The supervisor will hold a hearing with the DCT and intern within ten working days of issuing a Written Notice of Formal Review. If the DCT is the intern's direct supervisor, and additional supervisor and member of the WBES Training Committee will be included in the meeting. The intern will have the opportunity to provide a written statement related to their response to the problem.
3. Outcome: The outcome of the hearing will be communicated to the intern within five working days of the hearing decision, and will include one of the following:
- a) Acknowledgement and No Further Action Notice: Acknowledgment and No Further Action occur when the DCT and the Training Committee decide by a simple majority vote the program is aware of the problem; it has been brought to the attention of the intern; the problem is not significant enough to warrant an informal action plan, formal remediation plan, probation, or administrative leave, no further action is required to address the concern or problem. Or, if the problem needs to be rectified, the supervisor or other staff member will work with the intern to rectify the situation.
  - b) Informal Action Plan: An informal action plan is implemented when the DCT and the Training Committee decide by a simple majority vote that an intern's performance deficits or other problem behaviors present a low risk to others, the situation is amenable to adequately timely change, and that no further action could result in the problem worsening without an informal action plan. If a vote results in a tie, the DCT will break the tie. An informal action plan may include increased

supervision, didactic training, and/or structured readings. This process will be documented in writing and discussed with the DCT but will not become part of the intern's professional file. The informal action plan will not be shared with the intern's academic graduate program unless requested by the intern or agreed upon by the intern and the DCT. One or more progress reviews will be conducted as part of the intern's action plan within a specified timeframe.

- c) **Formal Remediation:** The difference between an informal and a formal remediation plan includes the formal remediation plan becoming part of the intern's professional file, the intern's academic graduate program being informed, and successful remediation is necessary for the intern to complete the internship program successfully. Implementing a remediation plan occurs after careful deliberation and thoughtful consideration of the relevant members involved. The DCT, supervisor(s), and Training Committee will determine the remediation plan's length. Various and perhaps concurrent courses of action may be included in modifying the intern's schedule to accommodate the remedial period of training, including increased supervision with the same or additional supervisors, adjusting the format, emphasis, and focus of supervision, adjusting the intern's clinical or other workloads, and requiring specific academic coursework or training. The process for implementing a formal remediation plan is as follows:
- I. The intern is verbally informed that formal remediation procedures will be documented and implemented within five working days of the remediation decision.
  - II. The formal remediation plan is placed in the intern's file. The DCT will share and discuss the formal remediation plan with the parties involved. This decision will be documented in writing, and the Director of Training will forward a copy of the document to the intern's academic graduate program within ten working days of sharing the document with the intern.
  - III. The formal remediation plan will state the specific conditions for the continuation of the internship.
  - IV. Progress reviews will be conducted as part of the intern's remediation plan within a specified timeframe. One or more progress reviews may be conducted.
  - V. A formal evaluation of progress under the remediation plan will be conducted by the DCT, Training Committee, and the intern's supervisor to decide whether the plan has been successful in resolving the issue, needs to

be extended, should be reduced to an informal plan, or if probation, administrative leave, or dismissal from the program are relevant to the issue.

VI. The formal remediation plan evaluation decision will be documented in writing and will be shared with the intern within ten working days of the meeting. This documentation will become a part of the intern's professional file. The decision will be shared with the intern's academic graduate program.

d) Probation: If the area of problematic behavior is deemed serious enough, the intern may be placed on probation. They will be given a letter specifying the following:

- I. Description of the unsatisfactory behavior.
- II. Actions required to correct the unsatisfactory behavior.
- III. Timeline for correction with a minimum of 30 days.
- IV. Explanation of the procedure that will be used to determine whether satisfactory progress has been made.
- V. Consequences if the problem is not corrected.
- VI. The DCT will review progress with the intern and relevant individuals at the end of the timeline. If the progress is insufficient, then the DCT will consult with the Training Committee to determine the next appropriate step. The DCT will provide the intern with a written statement detailing the intern's progress in relation to the remediation plan.

e) Administrative Leave: The intern may be placed on leave, which involves the temporary withdrawal of all duties and responsibilities in the agency. The intern will be informed in writing about potential consequences resulting from the suspension, which might include the inability to complete training hours or other requirements. If the administrative leave interferes with the successful completion of the training hours needed for completion of the internship, this will be noted in the intern's file and the intern's academic program will be informed. The DCT will inform the intern of the effects the administrative leave will have on the intern's stipend and accrual of benefits.

- I. The Training Committee will be convened to review the behavior in question within five working days of the intern being placed on Administrative Leave.
- II. The Training Committee will determine what actions the intern may take to correct the behavior, or if more significant steps should be undertaken.

- III. If it is determined there are corrective actions, then the intern will be provided with a written plan within ten days to make the corrective action.
  - IV. The plan will include consequences if the problem is not corrected.
  - V. The DCT will review progress with the intern and relevant individuals at the end of the timeline. If the progress is insufficient, then the DCT will consult with the Training Committee to determine the next appropriate step. The DCT will provide the intern with a written statement detailing the intern's progress in relation to the remediation plan.
- f) Dismissal: When appropriate, an intern may be dismissed from the WBES Doctoral Internship Program. The decision for dismissal will always be made in consultation with the intern's graduate program and APPIC. The intern receives written notice of dismissal, and may occur under the following circumstances:
- I. It is determined that remediation cannot be successfully accomplished;
  - II. Serious violation of ethical standards;
  - III. Serious violation of WBES policy and procedures;
  - IV. Serious violation of a school district policy and procedures;
  - V. Serious legal violation(s); or
  - VI. Any other condition that jeopardizes student, staff, or intern welfare and safety.

### ***Appeals Process***

Within five working days of the delivery of the written document outlining the actions to be taken to correct problematic behaviors or skill deficiencies, the DCT and the intern's supervisors will meet with the intern to discuss the action. If the intern wishes to challenge the decisions made, they may request an Appeals Hearing before the DCT (or other Training Committee member appointed by the Training Committee, if there is a conflict of interest with the DCT). This request must be documented in writing (e.g., email) to the DCT within five working days of notification regarding the decision made at any step of the process. If requested, the Appeals Hearing will be conducted by a review panel convened by the DCT to include the intern's primary supervisor, and at least two other members of the WBES Training Committee. The Appeals Hearing will be held within ten working days of the intern's request. 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 the decisions made previously or may modify them. The review panel has final discretion regarding outcome.

### ***Grievance Procedures***

A grievance procedure is a process that is invoked when an intern has a complaint against the training program or individual involved in the training program (e.g., supervisor, DCT, Training Committee member, etc.) or the internship program (e.g., complaints about evaluations, supervision, stipends/salary, harassment, etc.). Interns and others are expected to raise grievances consistent with the APA Ethical Principles. The Grievance Procedure guidelines are intended to provide the 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 the following steps will occur:

1. The intern raises the issue address as soon as feasible with the involved supervisor, staff member, other intern, or DCT in an effort to resolve the problem informally. In some cases, the DCT or another Training Committee member may wish to meet with the intern and the individual being grieved to provide consultation related to the issue. They will assist by serving as a consultant to assist in deciding how best to communicate with the individual, and facilitating a mediation session between the intern and the individual. The goal of the meeting will be to develop a plan of action to resolve the matter informally, and the plan of action will include:
  - a) The behavior or problem associated with the grievance;
  - b) The specific steps to rectify the problem; and
  - c) A designated time at which the parties will meet again to ascertain whether the problem has been appropriately rectified. If, after ten days, the matter cannot be satisfactorily resolved using informal means, the intern may submit a formal grievance in writing to the DCT. If the DCT 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 documenting the nature of the grievance, what attempts may already have been made to resolve the issue, and what are the desired outcome(s).
  
2. The DCT (or other Training Committee member appointed by the Training Committee, if the DCT is the object of the grievance) will meet with the intern and the individual being grieved within ten working days to determine a new or revised plan of action. The DCT (or other Training Committee member) will document the process and outcome of the meeting. The intern and the individual being grieved will be asked to report back to the DCT or other Training Committee member in writing within ten working days regarding whether the issue has been adequately resolved.



3. If the plan of action fails during the formal review process, the DCT or other Training Committee member will convene a review panel consisting of him/her/themself and at least two other members of the Training Committee or supportive faculty within ten working days. The intern may request a specific member of the Training Committee to serve on the review panel.
4. The review panel will conduct a review hearing at which the intern's grievance is heard, and the evidence presented. The intern may attend the hearing and respond to any concerns raised. Within ten working days of the completion of the review hearing, the Training Committee will issue a report documenting its findings and recommended response to the grievance. The review panel has final discretion regarding outcome.
5. If the review panel determines 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 Human Resources in order to initiate the due process procedures outlined in the employment contract. If the review panel determines that the grievance against the staff member potentially can be resolved internally, the review panel will develop a second action plan that includes the same components as above.
6. The process and outcome of the panel meeting will be documented by the DCT (or other Training Committee member). The intern and the individual being grieved will again be asked to report back in writing regarding whether the issue has been adequately resolved within ten working days. The panel will reconvene within ten working days to again review written documentation and determine whether the issue has been adequately resolved. If the issue is not resolved by the second meeting of the panel, the issue will be turned over to Human Resources to initiate the due process procedures outlined in the employment contract.