

Northern Arizona Healthcare Psychology Doctoral Training Program

Grievance/Disciplinary Policy and Process

The Grievance/Disciplinary process is modelled closely after that of the Arizona Psychology Training Consortium. The following are PDTP guidelines for evaluation of doctoral interns; general due process guidelines for management of problematic doctoral intern performance, conduct, or skill deficiencies; and due process procedures for problem resolution and doctoral intern grievances. These guidelines are consistent with the accreditation standards of the American Psychological Association. They emphasize due process and assure fairness in decisions about doctoral interns, and also provide avenues of appeal that allow doctoral interns to dispute decisions and file grievances.

The spirit that guides due process procedures is dialogue and collaboration. The PDTP does not make unilateral decisions unless there is imminent risk to clients, students, doctoral interns, or others. The protection of clients and doctoral interns is the overriding principle in collaborative decision-making.

I. EVALUATION OF DOCTORAL INTERN PROGRESS

In accordance with the PDTP's training philosophy, supervisors provide ongoing feedback to doctoral interns to assist in their professional development. It is important for doctoral interns to understand that communications between doctoral interns and supervisors are not confidential. However, supervisors will use discretion when deciding what is appropriate and necessary to communicate to other trainers.

A. Ongoing Feedback

Each primary and secondary supervisor is responsible for providing ongoing feedback to doctoral interns regarding their strengths, areas for growth, and progress towards successful completion of the internship. Supervisors document the feedback in their weekly supervision notes. Ongoing feedback may also be provided to the intern's Graduate Training Director regarding the intern's progress.

B. Written Evaluation

The Performance Evaluation form is used to evaluate the doctoral intern's professional competence and behaviors. It is completed both at the midpoint and the end of the training experience. The primary supervisor and the doctoral intern meet to discuss the evaluation, and both sign it to indicate that it has been reviewed. In addition, the secondary supervisor must sign the document. The doctoral intern may write a response on the Performance Evaluation form. The doctoral intern shall receive a copy of the Performance Evaluation form, and may challenge the evaluation through the process described below. The intern's Graduate Training Director will also be provided with a copy of the written evaluation, at

both midpoint and end of internship, and will be given an opportunity to provide feedback or request clarification.

C. Graduate Training Director Site Visit

If desired by the intern and Graduate Training Director, the Graduate Training Director may complete a site visit (via either a video conference call or a physical visit) to gain a better understanding of the intern's working environment and meet the intern's supervisor(s) and clinical manager.

II. DUE PROCESS IN EVALUATION AND REMEDIATION

The PDTP follows due process guidelines to ensure that decisions about doctoral interns are not arbitrary or personally based. These guidelines include appeal procedures that permit any doctoral intern to challenge program decisions. The due process guidelines include the following:

1. Present doctoral interns with the program expectations regarding professional functioning at the start of the training year.
2. Specify evaluative procedures, including the time frame and the method, in the Intern/Resident Training Agreement before the start of the training year.
3. Define "skill deficiencies" and "problematic behavior."
4. Use input from multiple professional sources, including the primary and secondary supervisor, when making decisions or recommendations regarding the doctoral intern's performance.
5. For doctoral interns, communicate early and often with the graduate program about any difficulties and seek input from the programs about how to address the difficulties.
6. Provide a remediation plan for skill deficiencies or problematic behavior, including a time frame for remediation and the consequences of not rectifying the deficiencies or problematic behavior.
7. Provide doctoral interns with a written description of procedures they may use to appeal decisions and to file grievances.
8. Ensure that doctoral interns have sufficient time to respond to any action taken by the program that affects them.
9. Document, in writing and to all relevant parties, the action(s) taken and its (their) rationale.

III. DEFINING AREAS OF CONCERN

In the PDTP, areas of concern typically fall into one of two areas:

1. Skill Deficiency. Skill deficiencies are defined as inadequate academic competencies, professional attitudes, or supervised training experiences to successfully complete the PDTP program of training. The concept of skill deficiencies reflects the efforts by the APA, APPIC, and other national training

organizations to establish basic competencies at each developmental level of training. Examples of skill deficiencies at the internship and postdoctoral levels of training include:

- Insufficient knowledge of ethical principles and practices;
- Prejudicial attitudes toward culturally different client populations;
- Insufficient knowledge of pertinent research within psychology;
- Inadequate skill and experience with test administration and interpretation;
- Difficulty forming therapeutic alliances with patients/clients/students;

or

- Limited skills in differential diagnosis, conceptualization and intervention with patients/clients/students.

2. Problematic Behavior. Doctoral intern behaviors are identified as problematic behaviors if they include one or more of the following characteristics:

- The doctoral intern does not adhere to the policies and procedures of the PDTP, including attendance, participation, documentation, and evaluation;
- The doctoral intern is resistant to appropriate opportunities for supervision and training;
- The doctoral intern disregards the direction and guidance of supervisors or training staff;
- The doctoral intern is conducting activities beyond the doctoral intern's ability or scope of practice;
- The doctoral intern engages in behavior which is disruptive of the daily operations of the PDTP;
- The doctoral intern does not acknowledge, understand, or address the problem when it is identified;
- The quality of services delivered by the doctoral intern at the training site is sufficiently negatively affected;
- A disproportionate amount of time and attention by supervisory and training staff is required for monitoring and remediation;
- The doctoral intern's behavior does not change as a function of feedback, remediation efforts, and/or time;
- The doctoral intern engages in unprofessional, unethical, or illegal behaviors, which are defined by the APA Code of Ethics and/or Arizona Statutes and Rules; or
- The doctoral intern jeopardizes the safety or welfare of patients/clients/students, other doctoral interns, training staff, or supervisors or personnel.

IV. PROCEDURES FOR RESPONDING TO A SKILL DEFICIENCY OR PROBLEMATIC BEHAVIOR

A. Initial Response

If a supervisor or PDTP member judges a doctoral intern's performance as reflecting a skill deficiency or problematic behavior, the following procedure will be initiated, unless the Training Director determines that immediate disciplinary action is appropriate.

1. A supervisor, or a PDTP member, notifies the doctoral internship Training Director that there is a concern about the doctoral intern's skills or professional functioning.
2. The Training Director initially consults with the primary and secondary supervisor, and perhaps affiliated training site administrators.
3. The Training Director will seek input from other sources as indicated.
4. The Training Director shall consult with the doctoral intern's academic department.
5. The Training Director may request informal problem resolution assistance from APPIC.
6. The Training Director will speak with the doctoral intern to attempt resolution of the problem(s).
7. If the above procedures do not bring resolution, then the Training Director may proceed to any appropriate disciplinary action, as described below.

B. Possible Disciplinary Actions

The Training Director, after consultation with the PDTP staff, may implement any of the following disciplinary actions. These are not necessarily sequential. The Training Director will select the course and extent of the action based on the needs of the doctoral intern and the patients/clients/students at the affiliated training site.

1. Written Notice. A Written Notice directs the doctoral intern to discontinue unsatisfactory action(s) or behavior(s). The doctoral intern will be given a letter specifying the following:
 - a. Notification to the doctoral intern that there is unsatisfactory behavior.
 - b. Description of the unsatisfactory behavior.
 - c. Actions required to correct the unsatisfactory behavior.
 - d. Timeline for correction.
 - e. Consequences if the problem is not corrected.
2. Probation. If the area of problematic behavior is deemed serious enough, the doctoral intern may be placed on probation. The doctoral intern will be given a letter specifying the following:
 - a. Description of the unsatisfactory behavior.
 - b. Actions required to correct the unsatisfactory behavior.

c. Timeline for correction.

d. Explanation of the procedure that will be used to determine whether satisfactory progress has been made.

e. Consequences if the problem is not corrected.

3. Administrative Leave. The doctoral intern may be placed on leave, accompanied by suspension of all duties and responsibilities. The doctoral intern will be informed in writing about potential consequences resulting from suspension, which might include inability to complete training hours or other requirements.

4. Dismissal. When appropriate, a doctoral intern may be dismissed from the PDTP. The doctoral intern must receive written notice of dismissal. Dismissal might occur under the following circumstances:

a. It is determined that remediation cannot be successfully accomplished;

b. Serious violation of PDTP policy and procedures;

c. Serious violation of ethical standards;

d. Serious legal violation(s); or

e. Any other condition that jeopardizes patient/client/student, staff, doctoral intern, or affiliated training site safety or welfare.

Following the delivery of the written document outlining the disciplinary action to be taken to correct skill deficiencies or problematic behaviors, the doctoral intern's supervisors will meet with the doctoral intern to discuss the action. The doctoral intern may accept the disciplinary action or the doctoral intern may challenge the disciplinary action through the grievance procedure described below. Pending the Administrative Manager's final decision on the grievance, the doctoral intern remains subject to the disciplinary action imposed by the Training Director.

V. DUE PROCESS FOR DOCTORAL INTERN-INITIATED GRIEVANCES

If a doctoral intern experiences a problem with a supervisor, Training Director, or PDTP staff, or if a doctoral intern has a personal complaint about the program (including but not limited to complaints about evaluations, supervision, stipends/salary, sexual harassment, etc.) then the doctoral intern shall proceed with the following steps for resolution:

1. Attempt to address and resolve the problem directly with the individual as soon as possible.

2. If addressing the problem directly is not successful, the individual is unavailable, or the doctoral intern prefers not to address the issue with the individual, then he or she may consult with the Training Director (**or Administrative Manager of Behavioral Health, if the grievance concerns the Training Director**). The Training Director/Administrative Manager will assist by taking one or more of the following actions:

- a. Serving as a consultant to assist in deciding how best to communicate with the individual;
- b. Facilitating a mediation session between the doctoral intern and the individual;
- c. Taking the issue to the PDTP staff for consultation and problem solving;
- d. Consulting with the PDTP Administrative Supervisor; or
- e. Requesting assistance from APPIC.

3. The doctoral intern will provide a letter to the Training Director/Administrative Manager within ten working days of the later of (a) the date of the event giving rise to the complaint or (b) the date the problem was raised with the Training Director. The doctoral intern's letter will document the nature of the grievance and what attempts may already have been made to resolve the issue.

4. Within ten working days after receipt of the letter from the doctoral intern, the Training Director/Administrative Manager will send a letter to the doctoral intern outlining the grievance procedure. The letter will include provisions for the doctoral intern to hear all material facts and to appear before a Review Panel, and it will provide a reasonable timeline to respond to the grievance.

5. The internship or residency Training Director/Administrative Manager will convene a Review Panel of at least three persons, consisting of supervisors and PDTP members. Any persons directly involved in the grievance will be recused from the Review Panel.

6. The Review Panel will conduct a review hearing at which the doctoral intern's grievance is heard and the evidence presented. The doctoral intern may attend the hearing and respond to any concerns raised. Within ten working days of the completion of the review hearing, the Review Panel will issue a report documenting its findings and recommended response to the grievance.

7. The Training Director/Administrative Manager will provide the Review Panel's report to the Administrative Supervisor. Within ten working days of receipt of the Review Panel's report, the Administrative Supervisor will issue a final decision regarding the grievance, which may include any of the following:

- a. accepting the Review Panel's recommendation;
- b. rejecting the Review Panel's recommendation and providing an alternative; or
- c. remanding the matter back to the Review Panel for further deliberation.

8. If the grievance involves the internship Training Director, then the Administrative Manager will appoint other members of the PDTP to convene and direct the Review Panel. The Training Director would make the final decision if the grievance involves the Administrative Manager.

9. Once the Administrative Manager/Training Director issues a final decision, the doctoral intern and other appropriate individuals will be informed promptly and in writing of the action taken. If the action involves an intern, the doctoral intern's academic institution will be included in this communication.