

SUNY Oneonta Doctoral Internship Trainee Policies & Procedures

Evaluation

General operating procedures

Policy regarding trainee performance problems

Trainee complaint procedures

1. Evaluation Policy & Procedures

Consistent and ongoing feedback on an intern's performance across multiple areas substantially promotes and intern's skills and identity as a psychologist. SUNY Oneonta Counseling Center strives to provide fair and constructive feedback on an ongoing basis so that Interns may have an accurate assessment of their strengths and weaknesses.

Intern evaluation focuses on major internship goals and their related objectives, and on major areas of professional competencies. Interns will be evaluated formally and informally by their supervisors and through self-evaluation throughout the program. Written evaluations by individual supervisors will be completed at mid-year in January, at the end of the 2nd semester in early May, and at the end of the internship at the end of July. At the mid-way point of each semester there will be a verbal progress report. Evaluations of other activities, including group therapy, outreach, and summer experiences will be completed by the licensed supervisor in consultation with the supervisor of that activity at the mid-year and at the end of the internship experience. Interns also complete evaluations of their supervisors at corresponding times during the year.

Copies of the evaluation forms are included in Appendix B.

The intent of evaluation is to provide sufficient feedback to help the interns gauge their progress toward their goals and to allow ample time and opportunity to modify their behavior and/or goals as needed. The intern and the supervisor both review the evaluation and then sign off after the feedback has been completed. A summary of the feedback the intern receives from the evaluation is sent to the Director of Training at the home institution at the mid-year and the end of the internship. At times throughout the year the interns are requested to give formal and informal feedback about their internship experience and the program in written and verbal form. Information gathered from this type of feedback contributes to a continual growing process within the internship program.

Expectations of the Intern

The following statements reflect important aspects of an intern's performance. Ratings are of the intern's actual skill level in light of the supervisory staff's expectations regarding what is acceptable performance at this point in the training program.

Level 5 (Advanced Skill Level: The minimum level expected of licensed provider in most

skill areas) Master of fundamental tasks in competency. Periodic supervision required for refinement of advanced skills in the competency. Can teach fundamental skills to other clinicians. Displays self-awareness and expertise in competency.

Level 4 (Advanced – Intermediate Skill Level) Master of fundamental tasks in competency. Ongoing supervision may aid in performance of advanced skills. Spontaneous demonstration of advanced skills. Generally demonstrates knowledge and expertise in this area.

Level 3 (Intermediate Skill Level) Trainee is generally able to perform fundamental tasks in competency. Trainee benefits from guidance, training, education and ongoing supervision in developing advanced skills in the competency. Growing confidence in the trainee's ability to perform independently. Demonstrates knowledge and expertise, but performance can be variable.

Level 2 (Beginning Skill Level) Requires supervision and monitoring in carrying out routine tasks in this competency area. Significant supervision and monitoring are required in performing advanced tasks. Trainee may be unaware of or unfamiliar with skill or behavior described in competency.

Level 1 (Little or no Skill) Performs inadequately for a clinician on the competency. Frequent and close supervision and monitoring of basic and advanced tasks is required. Lack of confidence in clinician's ability to perform independently. Has significant deficits in competency. Remediation may be considered.

NA Not applicable/No information

Exit criteria:

Midyear evaluation criteria: During the January evaluation, we require interns to reach an average score of Level 3 for each objective.

By the end of internship year, we require interns to reach an average score of Level 4 for each objective.

Basis for Evaluation

Evaluation is based on multiple sources of information about a trainee's performance. In addition to drawing on these sources for ongoing feedback, supervisors will typically review several of these sources just prior to completing the evaluation. Supervisors may ask for a case conceptualization or samples of taped sessions or other materials to assist in the evaluative process. Sources of information may include:

- Videotape or audiotape of client sessions

- Live observation of performance (especially with group work and outreach)

- Case notes and/or file review

- Written case conceptualizations

- Session Rating Scale (SRS) and Outcome Rating Scale (ORS) data

- Notes from supervision meetings

Role-plays
Client feedback, verbal or on client satisfaction surveys
Counseling Center statistical reports (attendance data, cancellation patterns, etc.)
Comments from Counseling Center staff or other college staff based on direct observation or interaction

Communication with the intern's home program

The Training Director is responsible for communicating with the intern's home doctoral program. Communications with the home program are sent 3 times a year: when the intern is matched with our program; in January of Internship a copy of the mid-year evaluation and summary of the intern's activities is sent; and then at completion of internship the training director send a copy of the final evaluation and letter certifying completion. In each communication, the home program is encouraged to contact the Training Director at any point. The interns are responsible for supplying any additional evaluation forms required by the home program.

If the intern experiences performance problems or problematic behaviors, the training director may contact the intern's home program when or if the problematic behaviors reach the level of schedule modification, depending on the severity of the problematic behavior. If or when the behavior leads to probation for the intern, the home training program must be contacted.

We also require interns to evaluate different parts of the internship program for ongoing feedback which helps us to continually improve our training program. See Appendix B for all evaluation forms.

2. General Operating Policies and Procedures

Intern Counseling: Supervision & Paperwork Flow
Group Procedures
Education and Referral
Consultation and Liaison
Outreach Activities
Assessment
Crisis Hour Procedures
Ethical Code
Absences and Vacation Procedures

Intern Counseling: Supervision & Paperwork Flow

- A. Clients are to be seen only during regular working hours when a supervisor or senior staff member is working. Under no circumstances is an intern to see a student without a supervisor or senior staff member on-site, unless by permission.
- B. All clients must be informed in their *initial* session with the intern about the intern's training level and the name of the intern's supervisor.
- C. Permission to audio and video tape will be requested from each of the intern's clients in the first session (See appendix A).
- D. All clinical notes, write-ups, letters, etc. must be signed by the intern's licensed supervisor.
 - Intakes and session notes are to be completed in Titanium (interns will be trained in Titanium procedures)
 - Letters and other paper forms will be uploaded into the Titanium program and attached to the client's chart.
 - Every piece of a client's chart will be electronically signed by the intern and then forwarded to the supervisor for review and a signature.
 - Please let the supervisor know if something is a priority and a quick turnaround is needed.
 - Paper forms can be dropped in the supervisor's box in the file room.
- E. If there is any concern about the student's safety, new cases are to be staffed immediately with the supervisor or with another available counselor.
- F. Ongoing case notes are to be completed in a timely manner, preferably the same day or the following morning.
- G. Intake write-ups are to be completed within three days of the intake. If the write-up is not completed the same day as the intake, please place written session notes in your working file folder (in the locked file room) where another staff member can access it if necessary.

- H. Interns will use evaluation instruments (Session Rating Scale and Outcome Rating Scale) for at least 5 sessions with 15 individual clients each semester.
- I. Under no circumstances can files, working notes, or supervision notes be taken out of the building. Files are to be locked in the file room each night.
- J. Interns are expected to come to all supervision meetings prepared with:
 - Agenda or ideas of what they want to focus on (cases, clinical issues, procedures).
 - Cases prioritized in order of importance and/or acuity of clients.
 - Video or audio prepared with chosen piece for review.
 - General clinical issues (especially related to supervision goals) ready for discussion if there are no pressing cases
- J. The intern supervisor may make supervision recommendations in writing in the client's file. The notes will be forwarded back to the intern's task list to review or make changes if necessary. The supervisor will not sign the note until all necessary changes are made. The intern should review all supervision notes before meeting with the client.

Group Procedures

- A. The intern will participate as much as possible in the marketing, recruitment, and screening of group members. The secretary can assist with the duplication of fliers and she can provide direction about the dissemination of publicity material.
- B. The group room should be reserved for all group times with the secretary. The room should also be reserved on Titanium. Groups are generally held for 1-1.5 hours.
- C. Responsibility for case notes in the individual's file (see item D) as well as records of group proceedings (see item E) will be shared by the intern and the co-facilitator, if there is one.
- D. After the group meeting the intern will meet with his or her co-facilitator to discuss the group process and dynamics and to collaborate on the group case notes.
- E. After a group is held, a general group note will be written and distributed to each client's file. This general note should include a description of the general proceedings of the group without identifying any of the other clients from the group. After this general group note is distributed to each client's individual file, an addendum must be created for each file in order to describe the content and process of contributions in the group by that particular client. All case notes will be signed by the intern, the group co-leader, and the intern's licensed supervisor.

Education and Referral

- A. A student is deemed appropriate for referral if their mental health needs are perceived to require long-term or open-ended treatment, reflect acute impairment in functioning, or if their needs would be better served by a specialist in the community. An intern will decide to refer a student to an external service provider in consultation with his or her supervisor.
- B. If a student is deemed appropriate for referral, the intern will discuss client preferences for therapist, availability of services and urgency of client need, insurance and financial matters, and transportation. Updated community referral options are kept on the S-Drive.
- C. An intern will instruct the student to contact the service provider and obtain further information or set up an appointment time.
- D. The student will then be requested to sign a release of information in order for the intern to communicate with the new service provider. Note: There is a specific referral form and release of information for the Student Health Center and for the Otsego County Mental Health Center. All other service providers will utilize the universal release of information form. The HC referral form is in Titanium. The rest are paper forms.(See Appendix A)
- E. The intern will contact the new service provider either by mail or telephone in order to indicate there is a release of information in place and in order to assist in the client's transition.
- F. Follow-up contact (telephone or in-person) should be made with the client in order to ensure that the referral has been successful.
- G. All referral documents and contact with the client and new service provider should be accurately documented in the client's file.

Consultation and Liaison

- A. Consultation requests are usually solicited by members of the college community by telephone. The secretary will contact the intern and state there is a caller with a question or need for consultation.
- B. The intern will elicit the appropriate information, respond with recommendations if possible, and seek consultation from senior staff as needed. If an intern needs to

obtain information from a staff member or supervisor, it is acceptable to put the caller on hold, or to phone the caller back if the situation is not urgent.

- C. The intern will complete the consultation form in Titanium after every consultation and send it to the supervisor to sign.
- D. A liaison relationship usually entails multiple contacts. The intern should keep a file recording the nature and results of any liaison contacts with another department, including any relevant material or program outlines.

Outreach Activities

- A. Interns may block off planning time in their schedules for outreach presentations. They can draw upon material from the Counseling Center resource file and are encouraged to consult with staff or supervisors as necessary.
- B. The intern will have outreach program participants complete evaluation forms for every program they provide (see Appendix B). The intern will document the number of participants, the contact person, and an outline of the presentation along with any suggestions for improvements for future presentations.
- C. At minimum, interns are required to participate in at least 6 outreach programs per semester and there must be at least 12 hours of after-hours outreach accumulated each semester (this gives each intern 25 extra clinical hours throughout the year to help meet the minimum requirement). A senior staff member will observe one outreach presentation per semester providing feedback to the intern. Some of these programs may follow a model from prior Counseling Center programs; however, interns are expected to develop and present one original program during the course of the internship year.

Assessment

- A. If an assessment is to be administered to a student, an appointment may need to be scheduled with Jan. Certain instruments may be administered during the normal counseling appointment, but longer assessments may require the reservation of an unused office space. The MMPI-II is administered on the computer and requires the reservation of the room with that specific computer.

B. Assessment instruments available are

Assessment	Approximate Administration Times
<i>Beck Depression Inventory-II (BDI-II)</i>	5-10 minutes
<i>Beck Anxiety Inventory (BAI)</i>	5-10 minutes
<i>State-Trait Anxiety Inventory (STAI)</i>	10 minutes
<i>Yale-Brown Obsessive-Compulsive Scale</i>	15- 20 minutes
<i>MMPI-2</i>	60-90 minutes
<i>NEO-PI-R</i>	35-45 minutes
<i>MBTI (short version)</i>	15 minutes
<i>AUDIT alcohol screening</i>	5-10 minutes
<i>MCMII-III</i>	20-30 minutes
<i>Brown ADD Rating Scales</i>	10-20 minutes
<i>Substance Abuse Subtle Screening Inventory (SASSI)</i>	10-15 minutes
<i>Beck Scale for Suicide Ideation (BSS)</i>	5-10 minutes
<i>Mood Disorder Questionnaire (MDQ)</i>	5-10 minutes

- C. If an assessment instrument is administered to the client outside of the regular counseling session, the appointment type should be coded as an assessment session and the case note should identify the assessment type and method of administration. The answer sheet and any report documentation should be uploaded and attached to the client's file.
- D. For every assessment administered, there should be some part of a session devoted to interpretation and discussion of the results with the client.
- E. For some assessment instruments the intern would need to have previously been trained and used this assessment with clients in order to administer the test during the internship. The training director will determine if a student has enough practical experience and training to administer an instrument, and will determine the type and level of supervision required.

Crisis Hour Procedures

- A. There is set aside 1 hour (2 hours during peak usage times) per week per counselor for walk-in appointments or crisis times. Any student may utilize these appointments, including on-going clients in crisis, and students who have reached their session limit.
- B. The student will contact the secretary who will schedule the student for the first available appointment. The intern is responsible for checking the schedule to ascertain if they have a crisis or walk-in appointment.
- C. If the student is new to the counseling center or returning for the first time in this academic year, they will be asked to complete the intake forms.

- D. The intern will meet with the client and ascertain the nature of the student's crisis or concern. The intern will consult with senior staff and health center staff as necessary. (See below if the student is deemed to be in danger to him or herself or appropriate for referral to Bassett Hospital Crisis Services.)
- E. Plans for follow-up or further treatment should be made with the client prior to the end of session. The session and all consultations are to be documented in the client's file.

Ethical Code

Interns are responsible for knowledge and compliance with the APA ethics code (available on APA website <http://www2.apa.org/ethics/code2002.doc>) for Psychologists and with NY State regulations for Mental Health Practitioners (<http://www.op.nysed.gov/title8/subart1.htm>). Interns will receive training on this issue during the orientation period.

Absences and Vacation Procedures

The Training Director will review procedures regarding absences and vacation days with interns during the orientation period.

3. Policy Regarding Trainee Performance Problems

(This policy is adapted from the University of California at Davis Counseling Center and the Seattle VA Medical Center manuals. The policy is valid as of 8/2/05 and is subject to change based on APPIC application results or other outside factors; interns will be informed immediately in writing of any changes.)

Interns will be notified of this policy, including due process procedures, during the initial 2-week Orientation period of the internship.

The internship program aims to develop professional competence. Rarely, an intern is seen as lacking the competence for eventual independent practice due to a serious deficit in skill or knowledge, or due to problematic behaviors that significantly impact their professional functioning. In some cases the problem identified may be of sufficient seriousness that the intern would be terminated and not get credit for the internship. In less serious cases, the internship program will help interns identify these problematic or deficit areas, and provide remedial experiences or recommended resources in an effort to improve the intern's performance to a satisfactory degree. Problems will be brought to the attention of the Training Director at the earliest opportunity, so as to allow time for remedial efforts when possible. The Training Director will inform the intern of staff concern, and invite the intern to attend a meeting with the TD and relevant senior staff. The intern will be encouraged to provide any information relevant to the concern.

The following section provides interns and staff a definition of problematic behavior, a listing of possible sanctions and a discussion of due process procedures.

Definition of Problematic Behavior

Problematic Behavior is defined broadly as an interference in professional functioning which includes but is not limited to the following: 1) an inability and/or unwillingness to acquire and integrate professional standards into one's repertoire of professional behavior; 2) an inability or unwillingness to acquire professional skills in order to reach an acceptable level of competency; 3) an inability or unwillingness to control personal stress, strong emotional reactions, and/or psychological dysfunction which interfere with professional functioning; and/or 4) unethical, illegal, or unprofessional behavior which is potentially harmful to clients or disruptive of the center's functioning.

It is a professional judgment as to when an intern's behavior becomes seriously problematic rather than of remediable concern. Trainees may exhibit behaviors, attitudes or characteristics which, while of concern and requiring remediation, are not unexpected or excessive for professionals in training. Problems typically become identified as serious impairments 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 one of a skill deficit remediable through further training;
3. the quality of services delivered by the intern is sufficiently negatively affected;
4. a disproportionate amount of attention by training personnel is required; and/or
5. the trainee's behavior does not change as a function of feedback, remediation efforts, and/or time.

Remediation and Sanction Alternatives

It is important to have meaningful ways to address problematic behavior once it has been identified. In implementing remediation or sanction interventions, the training staff will be mindful and balance the needs of the intern, the clients involved, members of the intern training group, the training staff, and other agency personnel. Note: This document does not supersede or contradict other employment policies or procedures of this institution with respect to appointment type and termination. While these sanctions are arranged in increasing order of severity, and may be applied in this order, they may also be implemented in a manner that is deemed warranted by the licensed supervisor in negotiation with Human Resources. That is, any sanction may be applied in any given situation with the approval of the Training Director and/or Director of Counseling. Sanctions may also be applied concurrently, e.g. a schedule modification and written warning.

- 1) Verbal Warning to the intern emphasizes the need to discontinue inappropriate behavior and/or begin appropriate behavior for the problem under discussion.
- 2) Written Acknowledgment to the intern formally acknowledges:
 - a) that the licensed supervisor is aware of and concerned with the performance rating,
 - b) that the concern has been brought to the attention of the intern,
 - c) that the licensed supervisor will work with the intern to rectify the problem or skill deficits, and
 - d) that the behaviors associated with the rating are not significant enough at that time to warrant more serious action.The written acknowledgment will be removed from the intern's file when the intern responds to the concerns and successfully completes the internship
- 3) Written Warning to the intern indicates the need to discontinue an inappropriate action or behavior. This letter will contain:
 - a) a description of the intern's unsatisfactory performance;
 - b) actions needed by the intern to correct the unsatisfactory behavior;

- c) the time line for correcting the problem;
- d) what action will be taken if the problem is not corrected
- e) notification that the intern has the right to request a review of this action.

A copy of this letter will be kept in the intern's file. Consideration may be given to removing this letter at the end of the internship by the TD in consultation with the intern's supervisor and Director. If the letter is to remain in the file, documentation should contain the position statements of the parties involved in the dispute.

- 4) Schedule Modification is a time-limited, remediation-oriented closely supervised period of training designed to return the intern to a more fully functioning state. This period will include more closely scrutinized supervision conducted by the supervisor. Several possible and perhaps concurrent courses of action may be included in modifying a schedule. These include:
- a) increasing the amount of supervision, either with the same or other supervisors;
 - b) change in the format, emphasis, and/or focus of supervision;
 - c) reducing the intern's clinical or other workload;
 - d) requiring specific academic coursework.
 - e) recommending personal therapy (a list of community practitioners will be made available).

The length of a schedule modification period will be determined by the TD in consultation with the primary supervisor. The termination of the schedule modification period will be determined, after discussions with the intern, by the TD in consultation with the primary supervisor. Should the situation progress to the level of schedule modification, the Training Director may choose to discuss the intern's performance concerns with the Home program.

- 5) Probation is also a time limited, remediation-oriented, more closely supervised training period. Its purpose is to assess the ability of the intern to complete the internship and to return the intern to a more fully functioning state. Probation defines a relationship that the licensed supervisor systematically monitors for a specific length of time the degree to which the intern addresses, changes and/or otherwise improves the behavior associated with the inadequate rating. The intern is informed of the probation in a written statement which includes:
- a) the specific behaviors associated with the unacceptable rating;
 - b) the recommendations for rectifying the problem;
 - c) the time frame for the probation

- d) the procedures to ascertain whether the problem has been appropriately rectified.

If the TD determines that there has not been sufficient improvement in the intern's behavior to remove the Probation or modified schedule, then the TD will discuss with the primary supervisor and the Director possible courses of action to be taken. The TD will communicate in writing to the intern that the conditions for revoking the probation or modified schedule have not been met. This notice will include the course of action the TD has decided to implement. These may include continuation of the remediation efforts for a specified time period or implementation of another alternative. Additionally, the TD will communicate to the intern's home program contact that if the intern's behavior does not change, the intern will not successfully complete the internship.

- 6) Suspension of Direct Service Activities means direct service activities will be suspended for a specified period as determined by the TD in consultation with the Vice President for Student Affairs. At the end of the suspension period, the intern's supervisor in consultation with the TD or VP will assess the intern's capacity for effective functioning and determine when or whether direct service can be resumed.
- 7) Dismissal from the Internship involves the permanent withdrawal of all agency responsibilities and privileges. When a problem is severe or when specific interventions do not, after a reasonable time period, rectify the impairment and the trainee seems unable or unwilling to alter her/his behavior, the supervisor will discuss with the Director or Vice President for Student Affairs and the Director of Human Resources the possibility of termination from the training program or dismissal from the agency. Situations resulting in either administrative leave or dismissal would include but not be limited to: 1) violations of NY laws or the APA Code of Ethics, 2) concern about imminent physical or psychological harm to a client or staff member or 3) the intern is unable to complete the internship due to physical, mental or emotional illness. When an intern has been dismissed, the supervisor will communicate to the intern's academic department that the intern has not successfully completed the internship. Recommendation for dismissal can be appealed to the Vice President for Student Affairs; if the appeal is denied then the recommendation would be forwarded to Human Resources for action.

Due Process: General Guidelines

Due process ensures that decisions about interns are not arbitrary or personally based. It requires that the Training Program identify specific evaluative procedures which are applied to all trainees, and provide appropriate appeal procedures available to the intern. All steps need to be appropriately documented and implemented. General due process guidelines include:

- 1) Giving notice: during the orientation period, interns are presented with the program's expectations related to professional functioning, the procedures for evaluation, and the guidelines above regarding problematic behavior.
- 2) Articulating the various procedures and actions involved in making decisions regarding impairment.
- 3) Communicating, as much as the situation allows, with the intern about any suspected difficulties and, when necessary, informing the intern's home institution and seeking input from that institution about how to address such difficulties.
- 4) Involving senior staff and, as warranted, other professionals, in order to gather multiple perspectives regarding the problem and appropriate actions.
- 5) Instituting, for less serious problems, a remediation plan for identified inadequacies, including a time frame for expected remediation and consequences of not rectifying the inadequacies.
- 6) Ensuring that interns have sufficient time to respond to any action taken by the program.
- 7) Sanction meeting/hearing: the intern meets with the Training director to discuss the problematic behavior. Senior staff may attend the meeting as necessary to provide more information about the problematic behavior. The intern is allowed to speak on their own behalf at this meeting. Approximately 24 hours after the sanction meeting, the intern will receive written feedback on what, if any, sanctions are being prescribed.
- 8) Providing a written procedure to the intern which describes how the intern may grieve the program's action. (See next section).
- 9) For more serious problems outlined above, documenting to all relevant parties the actions taken by the program and its rationale.
- 10) For severe situations resulting in dismissal, quick action may be taken by the Director of Counseling to relieve an intern of duties. An intern would still have the opportunity to appeal this action prior to dismissal.
- 11) Recommendation for dismissal can be appealed to the Vice President for Student Affairs; if the appeal is denied then the recommendation would be forwarded to Human Resources for action.
- 12) Appeals can be directed to the Vice President for Student Affairs. Appeals must be submitted in writing and must identify one or more of the following bases of appeal:
 - 1) There is new information that was not available at the time of the hearing.
 - 2) Due process procedures were not followed

- 3) The evidence did not support the outcome.
- 4) The result of the hearing was not fitting to the problem or violation.

The Vice President for Student Affairs will meet with all parties and will respond in writing within 5 working days, and the results will be forwarded to Human Resources and/or the Training Director for appropriate action.

XIV. Trainee Complaint Procedure

Interns will be informed of these procedures during the initial 2-week Orientation period of the internship.

In the event an intern encounters any difficulties or problems (e.g. unavailability of supervisor, evaluations and/or sanctions perceived as unfair, disagreement with sanctions or remediation actions, workload issues, personality clashes, other staff conflict) during his/her training experiences, an intern has the following options:

- A. Discuss the issue with the staff member(s) involved. We believe that most problems are best resolved through face-to-face interaction between intern and supervisor (or other staff), as part of the on-going working relationship. Interns are encouraged to first discuss any problems or concerns with their direct supervisor. In turn, supervisors are expected to be receptive to complaints, attempt to develop a solution with the intern, and to seek appropriate consultation. If intern-staff discussions do not produce a satisfactory resolution of the concern, a number of additional steps are available to the intern.
- B. Informal mediation: Either party may request the Training Director to act as a mediator or to help in selecting a mediator who is agreeable to both the intern and the other staff member involved. Such mediation may facilitate a satisfactory resolution through continued discussion. Alternatively, mediation may result in recommended changes to the learning environment, or a recommendation that the intern change rotations in order to maximize their learning experience. Changes in rotation assignments must be reviewed and approved by the Training Director.
- C. Formal Complaint: If the supervisor or TD cannot resolve the issue informally, the intern can put the complaint in writing and submit it to the TD for formal review. The intern and supervisor will be notified of the date that such a review is occurring. Formal review will be conducted by the TD and, at the discretion of the TD, members of the senior staff. The Director of Clinical Training at the intern's graduate school will be informed in writing of the complaint and kept apprised of the review process. A response will be provided to the intern within 5 working days. Based upon a review of the complaint, and any relevant information, the Training Director will determine the course of action that best promotes the intern's training experience. The intern will be informed in writing

of the Training Director's decision, and asked to indicate whether they accept or dispute the decision. If the intern accepts the decision, the recommendations will be implemented. If the intern disagrees with the decision, they may appeal (see section D). The intern's graduate program will be informed of the complaint outcome.

In the event that the complaint involves the Training Director, the complaint regarding the Training Director may be submitted directly to the Vice President for Student Affairs, and the Vice President for Student Development will hear any appeals.

These procedures are not intended to prevent an intern from pursuing a complaint under any other mechanisms available, including APA or APPIC. Interns are also advised that they may pursue any complaint regarding unethical or unlawful conduct on the part of psychologists or mental health practitioners licensed in New York State by contacting the office of the Examining Board of Psychology.

D. Appeals can be directed to the Vice President for Student Affairs. Appeals must be in writing and must identify one or more of the following bases of appeal:

- 1) There is new information that was not available at the time of the hearing.
- 2) Due process procedures were not followed
- 3) The evidence did not support the outcome.
- 4) The result of the hearing was not fitting to the problem or violation.

The Vice President for Student Affairs will meet with all parties and will respond in writing within 5 working days, and the results will be forwarded to Human Resources and/or the Training Director for appropriate action.

