

ILLINOIS SCHOOL PSYCHOLOGY INTERNSHIP CONSORTIUM

Procedures of Evaluation, Grievance, & Termination

Revised 5.1.26

INTRODUCTION

The Illinois School Psychology Internship Consortium (ISPIC) is committed to facilitating learning and professional growth for interns. A major focus of 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 interns can meaningfully explore their professional functioning. In response to interns' expectations, the training program assumes a number of general responsibilities. Primarily, it recognizes that the provision of on-going feedback to interns is fundamental to a successful training experience.

The internship program has the responsibility to assess the progress of interns throughout their training. To maximize intern growth and clinical development, it is important that such assessment be done on a continuing basis at timely intervals. It is also important that interns' expected performance be explained in advance along with the provisions for intern feedback if dilemmas or problems arise. ISPIC training staff recognize that developmental stressors are inherent both in interns' transition from graduate school to the internship setting, as well as during the internship itself. For example, when entering the internship, the rapidity with which interns must assimilate into a new environment and the expectation of competency in diverse clinical activities may be the source of considerable stress. Furthermore, supervision of their performance in these activities is typically more intense, concentrated, and frequent than trainees may have previously received in their graduate programs. Thus, while the internship represents a critical professional opportunity for interns to learn and refine skills, gain a greater sense of professional confidence, and develop a greater sense of professional identity, it is also a time of increased stress and vulnerability.

As interns confront significant developmental transitions, they may need special kinds of assistance. In order to provide pertinent information and to derive supportive measures or appropriate remediation, it is necessary for the internship program, in concert with the individual intern, to have an accurate sense of how the intern is progressing in relation to standardized criteria or norms. Every effort is made to ensure that interns understand the program's expectations about areas, as well as levels, of performance. Further, because interns receive ongoing feedback from the Training Director, the training staff (including individual supervisors in various areas), and other professionals with whom they have significant contact, interns should have "no surprises" resulting from more formal evaluation procedures. Thus, this document outlines the rights, responsibilities, and exit criteria for interns in the training process

as well as supervisor responsibilities. It also outlines the procedures for evaluation and formal grievance. Finally, it describes the due process procedures available to interns who have received notice of a formal action.

Intern Rights and Responsibilities

Intern Rights:

1. The right to a clear statement of general rights and responsibilities upon entry into the internship.
2. The right to be trained by professionals who behave in accordance with APA ethical guidelines.
3. The right to be treated with professional respect, that recognizes the training and experience interns bring.
4. The right to ongoing evaluation that is specific, respectful, and pertinent.
5. The right to engage in an ongoing evaluation of the training program experience.
6. The right to initiate an informal resolution of problems that might arise during the training experience.
7. The right to grievance and due process.
8. The right to receive written Notice of any concern being formally addressed.
9. The right to appeal any formal action taken by the program.
10. The right to raise concerns informally without fear of retaliation.
11. The right to initiate a formal grievance about aspects of the training program.
12. The right to request facilitated support in addressing a concern rather than proceeding alone.
13. The right to select an intern advocate to participate in the Advisory Committee process.
14. The right to receive a written response to a formal grievance.

Intern Responsibilities:

1. The responsibility to read, understand and clarify, if necessary, the statement of rights and responsibilities. It is assumed that these responsibilities will be exercised, and their implementation is viewed as a function of competence.
2. The responsibility to maintain behavior within the scope of the APA ethical guidelines. These principles are set forth in the APA's "Ethical Principles of Psychologists and Code of Conduct."

3. The responsibility to follow the policies and procedures of the internship program as well as the policies and procedures of respective ISPIC Partnering Site(s).
4. The responsibility to be open to professionally appropriate feedback from supervisors, professional staff, and agency personnel.
5. The responsibility to behave in a manner that promotes professional interactions.
6. The responsibility to give constructive feedback that evaluates the training experience or other experiences in ISPIC.
7. The responsibility to actively participate in the training, clinical services, and the overall activities of the Consortium. This includes requirements of completing Partnering Site and ISPIC paperwork in a timely manner, attending training seminars, completing logs, and providing information to the ISPIC office as requested for completion of all informational reports.
8. The responsibility to meet training expectations by developing competency in all areas delineated in the internship plan.

Program Responsibilities:

1. Follow the Due Process and Grievance procedures.
2. Communicate with the intern's graduate program early when concerns arise.
3. Base decisions on multiple sources of professional input.
4. Receive all grievances in good faith and without retaliation.
5. Provide interns with the Interns Concerns Committee Chair's contact information at orientation.
6. Facilitate meetings between the intern and the person of concern when the intern requests support.
7. Conduct a fair and thorough review of all formal written grievances and appeals.
8. Provide a written response within the defined timeframe.
9. Maintain documentation of all formal grievances and their outcomes.

Exit Criteria

To successfully complete the internship, the following criteria must be met:

- Total training time should approximate 2000 hours.
- A minimum of 600 hours has been spent in a school setting.

- A minimum of 600 hours has been spent in direct service.
- Interns have engaged in meaningful training experiences with both general and special education students ranging from 3–21-year-olds.
- Competency requirements have been met during the one-year full-time doctoral internship.
- An average of six hours per week has been spent in regularly scheduled, formal supervision learning activities, at least two hours of which were on an individual face-to-face basis.
- All client records, paperwork, and work products have been completed and reviewed with supervisors before the end of internship.
- Competency-based evaluations indicate that the intern's performance is commensurate with that expected of an entry-level professional psychologist. **Interns MUST be rated “proficient - expected competency of end-of-year intern” in all nine profession-wide competencies (PWC) for successful completion of internship. Minimum Level of Achievement for entry-level psychologists includes the ability to independently function in a broad range of clinical and professional activities, the ability to generalize skills and knowledge to new situations, and the ability to self-assess when to seek additional training, supervision or consultation.**

Evaluation Procedures

Interns are assigned at least one licensed clinical psychologist supervisor and a number of other supervisors at least one of which is a credentialed school psychologist. The group of supervisors serves as the intern's Training Committee (TC). One doctoral, clinically licensed supervisor is assigned for two hours of supervision per week, and the others for additional hours. Intern and supervisors determine the proportion of the intern's training that will be supervised by each supervisor.

In the context of these supervisory relationships, interns receive ongoing feedback regarding their professional strengths and areas/skills in need of improvement. Four formal feedback sessions are held during the year during which supervisors provide interns with formal feedback regarding their progress on profession-wide competencies. Following the session, they provide the Training Director (TD) with the completed Quarterly Feedback Form. Because it is important that in the course of the internship the home university is kept apprised of the intern's training experience, the TD provides the supervisors' feedback to the designated program representative. In February and July, the supervisor provides the TD with formal ratings of each of their intern supervisees using the ISPIC Internship Plan as well as the Quarterly Feedback Form. The Internship Plan provides a structured opportunity for supervisors to provide feedback on the profession-wide competencies. In addition to these quarterly feedback sessions, the supervisor

provides informal feedback during supervision sessions and reviews ISPIC work products to determine whether they are commensurate with those of an entry-level health service psychologist; they ultimately document this performance on the Internship Plan.

At the end of each of the four evaluation periods, the TC reviews the progress of each intern. Each supervisor reviews and discusses the evaluation with the intern (either alone or in concert). This process is designed to provide both evaluative feedback and suggestions and recommendations for improvement. Interns also use this session to provide verbal and written feedback to the supervisors regarding their role as supervisors and of their perception of supervision. Perceptual and/or factual differences between the supervisors' evaluation and that of the intern are expected to be resolved during this evaluation meeting. Interns are invited to respond in writing to the evaluation and submit it to the TD. A copy of the evaluation is forwarded to the TD and the ratings are entered into the ISPIC data management system. A copy of the final ratings on the Internship Plan is provided to the intern's home university.

The profession-wide competencies and corresponding performance indicators, are rated on the Internship Plan. The supervisor selects the appropriate rating from the following:

NO Not Observed

- 1. Marginal Competency – Beginning Intern:** The intern demonstrates limited competency expected of a beginning intern. They require significant oversight and support to apply knowledge and skills effectively. Performance is inconsistent or below expectations.
- 2. Gaining Proficiency – Expected Competency of Mid-Year Intern:** The intern demonstrates developing competency consistent with mid-year expectations. They apply foundational knowledge and skills with support. Performance is variable but improving, with occasional errors. Further development is necessary.
- 3. Exceeds Expectations for Mid-Year Intern:** The intern performs above expectations for a mid-year intern. They frequently apply knowledge and skills with growing confidence and consistency. Performance is mostly accurate and well-integrated, with few errors. The intern is progressing well toward readiness for independent practice.
- 4. Proficient – Expected Competency of End-of-Year Intern:** The intern demonstrates readiness for independent entry-level practice. They apply knowledge and skills effectively, showing sound judgment and professionalism. Performance is generally accurate, well-organized, and appropriate across settings and with routine cases. The intern is considered competent in this domain.
- 5. Exceeds Expectations for End-of-Year Intern:** The intern consistently demonstrates professional competence and judgment that surpass expectations for readiness for entry-level practice. They apply knowledge and skills independently, accurately, and

thoughtfully across complex cases and in a variety of complex settings, including novel situations. Performance reflects a high level of integration, clarity, and professionalism. The intern demonstrates advanced proficiency and is capable of functioning effectively across most contexts.

A. Informal Improvement Plan. At the mid-point, interns are expected to have reached a rating of, “Gaining Proficiency - Expected Competency of Mid-Year Intern” or above for each of the objectives on the Internship Plan. However, by the end of the first quarter, if not before, it is expected that supervisors and interns will have identified some areas of intern performance that are stronger and some that are weaker. If the intern demonstrates a skill-level in one or more objectives that is less developed than expected and likely to result in an inadequate rating on the mid-year evaluation, supervisors will bring this to the attention of both the intern and the TD. The TC and intern, with consultation from the TD if needed, will develop an informal plan (using the Quarterly Feedback Form) to target the skill for growth. The strategies will be described in the quarterly narrative and may include such things as 1) extra readings or additional academic coursework, 2) change in the format, emphasis and/or focus of supervision (e.g. supervisor modeling, co-delivery of services, real-time supervision, increased opportunities for practice) or 3) reduction of the intern's clinical or other professional duties. This level of focus on isolated skills is not uncommon in the early months of the internship and should not be cause for alarm.

If not before, the process of developing an Informal Plan will occur in the event that an intern is rated "Marginal Competency – Beginning Intern" on the mid-year evaluation. Because the plan is being developed in response to the mid-point evaluation, the informal response may carry with it an additional sense of urgency to address the area of weakness in a timely fashion.

By the end of the training year, it is expected that successful program completers will have reached an overall rating of " Proficient - Expected Competency of End-of-Year Intern” on all profession-wide competencies.

B. Remediation Plan – Formal Action. If, however, before, during, or after an Informal Response occurs, the TC suspects that the skill deficit is so great or there are so many skills that are substantially weaker than expected that the intern may be in jeopardy of unsatisfactory completion of the internship, they will develop a Remediation Plan.

In the event a Remediation Plan is initiated, interns will be notified in writing and reminded of their right to Due Process (described below). During a remediation period, the TC and TD actively and systematically monitor, for a specific length of time, the degree to which the intern's performance improves. The Remediation Plan is a written document that includes (a) the behaviors associated with the inadequate rating; (b) specific recommendations for remediation (e.g. the same strategies used in developing the Informal Plan); (c) the time frame during which the weakness is expected to be addressed, and (d) the procedures designed to ascertain whether the weakness has been adequately remediated. Typically, specific objectives

become the primary focus of the training experience. It is not uncommon for the TC to alter substantially the intern's training activities so that intensive support can be provided for the intern's development in the area of concern. The TD and one or more of the members of the TC meet with the intern to review the remediation conditions. The intern is invited to raise any differences of perception or concerns with the plan as presented. When a Remediation Plan is developed, the TD will inform and/or include the intern's home university and provide a copy of the Plan. The intern shall receive a copy of the letter.

Once a Remediation Plan is developed by the TC, it is expected that the status of the rating will be reviewed no later than the next formal evaluation period, or, in the case of remediation, no later than the time limits identified in the remediation statement. If the rating has been rectified to the satisfaction of the TC, the intern, graduate program, and other appropriate individuals will be informed and no further action will be taken.

If the TC determines that there has not been sufficient improvement in the intern's behavior to remove the inadequate rating under the conditions stipulated in the Remediation Plan, the TC will communicate, in writing, to the intern that the conditions for revoking the remediation have not been met. The TC may then adopt one of the following methods. It may issue:

- a continuation of the remediation for a specified time period.
- a notice regarding the decision to develop a probationary plan.
- a notice informing the intern that the TC intends to terminate the intern.

C. Probationary Plan – Formal Action.

Some criteria which may guide the TC's decision to develop a Probationary Plan rather than extend the remediation period are: 1) the trainee's behavior does not change to the degree expected as a function of feedback, remediation efforts, and/or time, 2) the skill deficits are so severe and pervasive there is concern that they will not be remediated prior to the end of the training year. **In the event a Probationary Plan is initiated, interns will be notified in writing and reminded of their right to Due Process (described below).** A probationary plan is warranted when supervisors have concerns about an intern having contact with students or other vulnerable parties. On extremely rare occasions, a training committee may determine that an intern's service provision should only occur under direct observation by a supervisor. This is one example of a time when a probationary response is warranted. A probationary plan is not a required step prior to terminating an intern. The procedures for a probationary Plan are identical to those described above for a remediation plan.

D. Termination – Formal Action. Some criteria which may guide the TC's decision to terminate are: 1) the intern does not acknowledge, understand, or address the concern when it is identified, 2) the quality of the intern's service delivery is negatively affected and may be considered unhelpful or detrimental to clients, 3) the trainee's behavior does not change as a function of

feedback, remediation efforts, and/or time, 4) the skill deficits are severe and pervasive, 5) multiple and similar observations are made by more than one supervisor. **In the event a decision to terminate is initiated, interns will be notified in writing, detailing the date of termination, at which time the stipend will cease.** Interns will also be reminded of their right to Due Process (described below). The Partnering site's Human Resources Department will be engaged as appropriate and/or required by law.

Intern Violation

In extremely rare circumstances, an intern will engage in an act that violates professional ethical standards and regulations, Partnering Site policies and procedures, and/or state/federal law such that their behavior infringes on the rights, privileges, or responsibilities of others. Any individual can raise a concern regarding an intern violation. The TD will investigate the matter and review the concern with members of the TC. When possible, concerns are addressed within the context of the normal evaluation procedures. However, if the behavior warrants immediate action, the TC may:

- Attempt to rectify the situation
- Report the violation to the appropriate authorities
- Take disciplinary action up to and including termination from the program

Due Process and Grievance Procedures

The Illinois School Psychology Internship Consortium maintains two separate written procedures to protect the rights of interns and uphold the integrity of the training program: (1) **Due Process** and (2) **Grievance Procedures**.

PART I: Due Process Procedures.

Due process procedures apply when concerns arise about an intern's professional functioning or conduct beyond those that can be addressed in the Quarterly Feedback Form. These procedures ensure that decisions about interns are not arbitrary, that clear expectations are communicated, and that interns have defined rights throughout the process.

When concerns about an intern's performance are identified such that a formal action is considered, the program will:

- Communicate early with the intern's graduate program about suspected difficulties and seek input on how to address them;
- Use input from multiple professional sources when making decisions about intern performance;
- Document all actions taken and the rationale, in writing, to all relevant parties; and

- Ensure that interns are given sufficient time (as described below) to review and respond to any action taken.

Notice of Formal Action.

The intern must be formally notified, **in writing**, using the Quarterly Feedback Form as a guide, that the TC has determined that formal action is warranted. Formal actions include a Remediation or Probation Plan or Termination (details on the various types of formal actions are described in the Evaluation Procedures section above).

The Notice must include:

- A clear description of the specific behavior or competency concern;
- Reference to the program expectation or standard that has not been met;
- The date the concern was identified; and
- Information about next steps in the due process procedure.

The Notice should be provided as promptly as possible following identification of the concern. The intern should be asked to sign and date the Notice to acknowledge receipt (not necessarily agreement).

If a formal remediation or probationary plan is developed, it must be provided to the intern in writing and must include:

- A clear description of the behaviors or competencies to be addressed;
- Specific, measurable expectations for improvement;
- A timeline for achieving the required improvement; and
- Consequences if the required improvement is not achieved within the stated timeline.

Within five (5) working days of receipt of the TC's Notice, the intern may respond to the TC's action by (a) accepting the action and, therefore, waiving the right to both hearing and appeal, or (b) participating in a hearing.

If the intern chooses to participate in a hearing, the intern must provide the TD, within 10 days, with information in writing as to why the intern believes the TC's action is unwarranted. A lack of reasons by the intern will be interpreted as accepting the action.

Intern Hearing.

The Hearing will involve the TD, the TC, the intern, and an intern advocate, often a representative from the intern's home university. The intern retains the right to hear all facts with the opportunity to dispute or explain his/her behavior. A hearing will be conducted, chaired by

the TD, in which the relevant information is presented by the intern with assistance from the intern advocate.

The Hearing must include:

- A formal meeting between the intern and appropriate program representatives (e.g., Training Director, supervisors, and/or members of the Intern Concerns Committee);
- A clear presentation of all concerns to the intern;
- A dedicated opportunity for the intern to respond to the concerns, ask questions, and provide relevant information; and
- Documentation of the meeting, including who was present, what was discussed, and the intern's response.

Within five (5) days of the completion of the hearing, the TC and TD shall determine whether the information provided by the intern is sufficient to overturn the formal action. The intern will receive written notification of the outcome of the hearing, either that the decision is overturned or upheld, and of their right to appeal the hearing decision.

1. Overturned. When the decision is overturned, the TC will continue efforts to move the intern toward successful completion of the program, and the TC will communicate its recommendation to the intern.
2. Upheld. When the decision is upheld, the intern, graduate program, and other appropriate individuals will be informed in writing of the decision to continue with formal action.

Within five (5) working days of receipt of the outcome of the hearing, the intern may respond to the action by (a) accepting the action and, therefore, waiving the right to appeal, or (b) appealing the decision on the basis of substance or procedure.

Appeal.

The intern may appeal on the basis of procedural error (e.g., the steps of due process were not followed), or substantive disagreement with the program's findings based on newly available relevant information. The appeal review should be conducted by parties one step beyond the Training Director and not directly involved in the original decision.

All documents associated with the intern's behavior/progress are submitted to a panel of three governing board members (members of the Intern Concerns & Development Committees), who form the Appeal Board. Each member reviews the documents separately and subsequently conferences regarding the decision of the TC. The Appeal Board will either overturn the formal action or uphold the formal action.

1. Overturned. The Appeal Board may overturn formal action based on substance and/or procedure, the TC will be charged with returning to an informal plan. If termination was

the decision overturned, the TC will develop a Remediation or Probationary Plan, as appropriate, and the stipend will be reinstated.

2. Upheld. If the Appeal Board determines that the formal action taken is the appropriate course of action, the intern, graduate program, and other appropriate individuals, which
3. may include the Chair of APPIC and any relevant professional credentialing bodies, will be informed in writing of the formal action.

PART II: Grievance Procedures

To protect the needs and rights of all interns, a formal grievance procedure has been developed for any situation not associated with the Evaluation Procedures. While it is hoped that any concerns or complaints can be discussed and resolved informally, a formal mechanism is appropriate in light of the power differential between supervisory staff and interns. In general, interns are encouraged to work actively to create training experiences that fit their needs and interests and to work with Illinois School Psychology Internship Consortium to ensure that their needs are met. Giving feedback (both positive and negative) to supervisors and/or the TD is encouraged and welcomed.

Grievance procedures apply when an intern has a concern or complaint about the training program — including concerns about supervision quality, workload, harassment, discrimination, or any other aspect of the training experience. These procedures provide a clear, step-by-step pathway for interns to raise concerns and have them addressed fairly. It is not uncommon during the internship year for interns to experience dissatisfaction with some aspect of their training. The vast majority of such concerns, when raised, are satisfactorily resolved.

A. General Principles

- Interns are encouraged to raise concerns early and directly. Most concerns can and should be resolved through informal conversation.
- All parties involved in a grievance process should act in good faith and maintain privacy to the extent possible.
- Interns will not face retaliation for raising a concern or initiating a formal grievance.
- An **Interns' Concerns Committee** exists to assist interns in resolving conflicts. The name and contact information of the Intern Concerns Committee Chair is provided to interns during orientation.

Informal Complaint

Interns are encouraged to first attempt informal resolution:

1. Discuss the concern directly with the person involved (e.g., the supervisor or Training Director).

2. If the concern is not resolved, or if the intern is not comfortable approaching the person directly, the intern should speak with their individual supervisor or the Training Director.
3. If the intern is uncomfortable speaking with the Training Director or their individual supervisor for any reason, the intern should contact the Intern Concerns Committee Chair.
4. If the intern is not comfortable addressing the situation alone, the Training Director, supervisor, or Intern Concerns Committee Chair will facilitate a meeting with the intern.
5. If the concern involves an employee of a Partnering Site who is not affiliated with ISPIC, the supervisor and/or Training Director will consult with the Director of the Partnering Site, who may then take the lead in facilitating a meeting between the intern and that employee.
6. Throughout the informal process, the TD may consult with members of the ISPIC Supervision Committee, the Diversity Mentors, or other relevant ISPIC committees as appropriate. The TD may also utilize the APPIC Informal Problem Consultation service as needed.

If a grievance involves potential violations of state or federal law (e.g., harassment, discrimination), interns are also encouraged to seek guidance from the host agency's Human Resources department or relevant legal authorities. ISPIC's grievance procedures do not supersede applicable law or Partnering Site HR policies.

Formal Grievance

If the concern is not resolved in the meeting(s) with the intern, supervisor, TD and/or Committee Chair, the intern may submit a formal grievance in writing.

1. **Written Grievance Submission:** The intern submits a formal grievance in writing to the Training Director. If the Training Director is the subject of the complaint, the written grievance is submitted to the Intern Concerns Committee Chair. The written grievance should describe: (a) the nature of the concern; (b) when and where it occurred; (c) who was involved; and (d) what resolution the intern is seeking.
2. **Convening of the Advisory Committee:** Upon receipt of the formal grievance, the TD (or Intern Concerns Chair) will convene an Advisory Committee to deliberate the grievance. The Advisory Committee will include: the individuals already involved in the informal process; members of the Interns' Concerns and Development Committees; and, if the intern chooses, an intern advocate selected by the intern (often one of the Intern Representatives).
3. **Deliberation and Plan of Action:** The Advisory Committee will review all relevant information and outline a course of action.

4. Written Summary: The TD (or Intern Concerns Chair) will distribute a written summary of the plan to all parties involved.
5. Governing Board Notification: The decision will be communicated to the full ISPIC Governing Board at its next meeting and provided to APA.