

Supersedes:

Policy No. 2030.005

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POLICY & PROCEDURE

Program/Department: Psychology

Subject: Psychology Interns, Problem Performance

I. Policy

Psychology Interns who experience significant competency problems or disruption in training sequence will be carefully evaluated to establish a plan for remediation and/or termination as may be required. This policy addresses procedures in the case of problem performance. The intern's employment is employment at will, and this policy does not create contractual or legal obligations for WellSpan Philhaven. WellSpan Philhaven may refrain from following the policy when deemed appropriate. For other employment related issues, WellSpan Philhaven Human Resources policies apply.

In many cases problem performance is identified after: 1) initial efforts to support the psychology intern in improving competencies and skills (such as providing extra education, supervision, or training activities) have not yielded expected improvements; and/or 2) the WellSpan organization's Just Culture practices are employed where relevant, and yet performance problems/concerns persist.

II. Definition-Problem performance may include any of the following:

- A. Psychology Intern is unable to fully participate in internship due to absence from the program or reduction in hours. Absences from the program will be considered and reviewed on a case-by-case basis.
- B. Psychology Intern is unable or unwilling to consistently perform the basic functions of the internship, including clinical assignments and educational/training activities.
- C. Psychology Intern's performance in any area of competency is rated "1" on a Competency Observation Review (below entry internship level rating), or the intern otherwise demonstrates performance that is below internship expectations.
- D. The quality or volume of services delivered by the Psychology Intern is below organizational standards.
- E. Complaints from program managers, co-workers, or clients exceed the number or level of severity that is typical for a psychology intern in areas such as interdisciplinary/team or other co-worker relationships and relationships with clients and families.
- F. Psychology Intern violates ethical/legal standards as set by APA, Pennsylvania law, or other authoritative bodies.

III. Procedure for identification of problem performance and intervention when problem performance is determined:

A. Problem performance will be evaluated when (one of the following):

1. One of an intern's Clinical Supervisors has given written notice of suspected problem(s) to the Internship Training Committee or the Internship Director;
2. The Internship Training Committee identifies and documents a suspected problem in one of its meetings;
3. A Competency Observation Review, completed by a Clinical Supervisor, documents one or more competency elements at the lowest level (below entry internship level, or rating of "1").

B. Within two weeks from the time the concern is identified, the Internship Training Committee or Internship Director will convene a process to determine a course of action, in consultation with appropriate administrative staff such as the WellSpan Philhaven Vice President and Chief Medical Officer-Behavioral Health and the WellSpan Philhaven Director of Human Resources. This process may result in:

1. Performance Improvement Plan.

- a. The Performance Improvement Plan is aimed at supporting improvement in areas of identified performance concern.
- b. The plan includes clear goals for improvement, activities identified to help reach the goals, support resources available or required, expectations for achievement and related timeframes, etc.
- c. The intern's clinical supervisor collaborates with the Internship Director and other internship training staff as appropriate to implement and monitor the plan.
- d. The Internship Director collaborates with the intern's graduate program Director of Clinical Training or designee, communicating the Performance Improvement Plan and providing updates on progress.

2. Corrective Action Plan

- a. Setting Up the Plan -The Corrective Action Plan may either function as the initial step to address Problem Performance or as the follow-up to a Performance Improvement Plan that was not completed successfully. In either case the Internship Director collaborates with the Director of Human Resources or other HR leader to form a

Corrective Action Committee. In addition to the Internship Director and Human Resources leader, the committee shall include at least two of the following: members of the Internship Training Committee, the intern's current clinical supervisor, other administrative supervisor. Initially, the Corrective Action Committee will:

- Specifically identify the performance problems
- Determine if any corrective or disciplinary action must be taken immediately
- Ensure communication and collaboration with the intern's graduate program throughout this process
- Assess and make recommendations/requirements for any or all of the following:
 - Written Plan of Remediation (in all cases other than suspension) including time frame for expected remediation and any additional training or supervision that will be provided/required.
 - Use of EAP
 - Leave of absence
 - Reduction of workload/hours
 - Termination from the internship program.
- Inform the intern of the outcome of the committee meeting, including all recommendations.

- b. Monitoring the Plan - The Corrective Action Committee will collaborate with the Internship Training Committee to monitor the intern's progress and make decisions about the intern's problem performance status, including decisions about whether the intern will complete the internship. Additional representatives from Human Resources and WellSpan Philhaven administration who are not already on the Corrective Action Committee will be consulted as needed. The intern will be given verbal and written feedback which speaks to their progress in this process and any recommendations from the Corrective Action Committee. This may include feedback in supervision meetings, written evaluations, verbal and/or written updates from supervisors or program staff that have been involved in the remediation process, feedback from direct observations, verbal and/or written updates from the Internship Director, etc.

C. Due Process and Appeal Procedure

1. During the process of a Performance Improvement Plan or Corrective Action Plan, the psychology intern will be given the option to meet with a mentor.

When the intern chooses to engage a mentor, the Internship Director will either appoint a mentor or select potential mentors and offer the intern a choice from among the candidates. Mentors will be WellSpan Philhaven Staff members and in some cases may be part of the internship program. The mentor is able to listen and offer support, coaching, and teaching functions. The mentor role may include helping explain the plan, addressing the intern's questions, providing education on organizational practices and culture, providing professional coaching on ways to navigate the process effectively, etc. The mentor will be expected to maintain confidentiality as appropriate.

2. Interns may formally appeal the Training Committee's determination of problem performance, or any other actions initiated by the Training Committee or Corrective Action Committee in this remediation process. A decision to suspend or terminate the intern from the internship may also be appealed. All appeals should be made in writing and will be considered by the Vice President and Chief Medical Officer-Behavioral Health or their designee. Any appeal should be initiated within two weeks from notification of the action. The review by the Vice President/CMO or designee will occur within two weeks from receipt of the appeal. The intern may request that a consultant be appointed to work with them to review and facilitate the appeal process. The consultant would be utilized for assistance in navigating and understanding this process and would not participate in the decision-making.

D. Leaving the Problem Performance Status

1. Successful completion of remediation plan.
2. Approval of Internship Training Committee and, if applicable, Corrective Action Committee.

E. Psychology Intern Feedback on Process

1. The Internship Training Staff will request written feedback from the intern at the conclusion of a remediation process. The Internship Training Staff will review this feedback for the purpose of process improvement.

Approved by _____
Program/Department Director

Date _____

Approved by _____

Date: _____