



Origination 7/23/2024  
Last Approved 7/23/2024  
Effective 7/23/2024  
Last Revised 7/23/2024  
Next Review 7/23/2025

Owner Jennifer Lee:  
Director  
Area Medical  
Education  
Applicability Gundersen

## Psychology Doctoral Internship Due Process Policy

### References

Association of Psychology Doctoral and Internship Centers (APPIC)

### Applicable To

All psychology doctoral interns of Gundersen Lutheran Administrative Services, Inc., independently and as agent for Gundersen Lutheran Medical Center, Inc., Gundersen Clinic, Ltd., Gundersen Medical Foundation, Inc., Memorial Hospital of Boscobel Inc., Tri-County Memorial Hospital Inc., St. Joseph's Health Services Inc., Palmer Lutheran Health Center, Moundview Memorial Hospital & Clinics, Inc., and Saint Elizabeth's Hospital of Wabasha, Inc. (hereinafter referred to collectively as "Gundersen").

### Purpose Statement

This policy covers corrective actions, suspensions, and terminations of interns, as well as any complaints or grievances that interns may have related directly thereto. For complaints and grievances involving other issues, please refer to APPIC Doctoral Psychology Internship Grievance Policy.

### Definitions

For purposes of this policy, the following terms have the following meanings:

**"Academic Deficiency"** means any one or more of the following: insufficient level of medical knowledge; inability to use medical knowledge effectively in connection with patient care; lack of appropriate technical skills; insufficient level of professionalism; insufficient level of interpersonal and communication skills; lack of practice-based learning and improvement; or lack of system-based practice that bears on an intern's academic performance.

**"Education Committee"** means the Committee comprised of faculty of the internship training program who meet regularly to review intern performance; makes recommendations to the program co-directors for intern progress, including remediation and dismissal.

**"Co-Director"** means the Training Program Co-Directors of the Internship training program or an authorized representative thereof.

**"VP"** means Vice President of Medical Education.

**"HR Partner"** means Human Resource Partner.

**"Serious Misconduct"** means any one or more of the following: a violation of applicable federal, state, or local law or regulation; a violation of professional or ethical standards commonly applied to physicians and interns; an act or omission defined as unprofessional conduct by chapter 448, Stats. or the Wisconsin Medical Examining Board; and any act in violation of chapters 161 or 450, Stats. involving unlawful use, transfer, and prescription of various controlled and other substances.

**"Performance Improvement Plan (PIP)"** means a tool given to an employee with performance/ academic deficiencies that provides the framework for an opportunity to succeed.

**"Intern"** means a person appointed to an internship position in the Gundersen Lutheran Medical Education program sponsored by Gundersen Lutheran Medical Center, Inc., Gundersen Clinic, Ltd., and Gundersen Medical Foundation, Inc.

## Implementation

### REVIEWS:

- A. The Program Co-Directors (PD) of the internship program shall meet with the education committee to review and assess the competency-based academic and professional performance of all interns within their program. This periodic review shall be conducted no less than twice each year for all interns. The intern will receive in writing if there is problematic behavior that requires verbal or written coaching. The PD will advise the intern of what the PD is presenting to the education committee if corrective action is needed beyond verbal or written coaching. If there are any significant concerns/issues with the intern's performance, the VP must be informed via written communication of the concerns/issues.
  1. **Need for Corrective Action:** Whenever the academic or professional performance of an intern is considered to be unsatisfactory to the operations and/or educational environment of the institution, to which the intern is assigned, corrective action regarding the individual may be taken by the program co-directors (PD). If a deficiency is found which requires corrective action beyond verbal or written coaching, the intern will be notified in writing, and a meeting will be scheduled with the intern, so they have the chance to provide input on the problematic behavior.
  2. **Corrective Action:** A Performance Improvement Plan (PIP) will be developed which will indicate the performance and/or academic concerns and define the performance and/or academic requirements, monitoring plan, timelines, and consequences of failing to meet the requirements of the PIP. The PD will collaborate with the VP and the HR Partner to develop a performance improvement plan of the

performance and/or academic concerns. During the PIP timeline, the PD shall meet in person with and counsel the intern and inform the intern of progress related to the PIP.

3. **Concluding the PIP:** At the conclusion of the PIP (which is predetermined at the onset of the PIP), the PD will review the assessment data with the advisement from the VP and HR Partner, and subsequently review with the intern. One of four outcomes is possible:
  - a. Successful completion of the PIP
  - b. Unsuccessful completion of the PIP
  - c. The PIP needs to be continued for an extended interval to collect more data.
  - d. The PIP needs modification to provide alternate or improved data about the intern upon which to make an informed decision.
4. If the PD with advisement from the VP and HR Partner determines the intern has successfully completed the PIP (outcome "a." as listed above), the decision will be documented by the PD and communicated in writing to the intern, the HR Partner, and the VP.
5. If the PD, with advisement from education committee, determines the intern has outcome "b., c., or d.", the PD will determine the action to be taken in collaboration with the HR Partner and the VP. The decision will be documented by the PD and communicated in writing to the intern, the HR Partner, and VP.

#### **B. Interns Options:**

1. If the recommendation in section 3 above is deemed adverse by the intern (suspension, termination, extension), the PD shall give the intern at least three (3) business days to elect one of the following options:
  - a. Accept the decision of the PD in writing.
  - b. Submit a written resignation from the program to the PD.
  - c. Submit a written request to the PD requesting appeal of the decision. If the intern does not reply in writing in three (3) business days, then the recommendation will be realized.
2. If the intern appeals the decision, the PD, and the VP and HR partner shall meet with the intern within three (3) business days of receiving the written request to appeal the decision. Any exception to the timeline must be approved by the VP. At the appeal meeting, the intern will provide a verbal basis for the appeal and the intern and PD will provide a verbal account of the situation. The intern will be advised of the appeal decision in writing within five (5) business days of the meeting. If the appeal decision recommends an employment outcome deemed adverse by the intern (suspension, termination, extension) the intern has three (3) business days to elect one of the following three options:
  - a. Accept the decision of the PD in writing.
  - b. Submit a written resignation, resigning the intern's appointment

(resignation maybe done anytime during the appeal process)

- c. Submit a written request to the VP requesting appeal of the PD's decision.
3. If the intern does not reply in writing in three (3) business days, then the recommendation will be realized.
4. If the intern submits a written request to the VP requesting an appeal, the VP and HR Partner will review the request and meet with the intern to determine a final decision.

**Serious Misconduct:**

- A. Notwithstanding the above, the PD of the internship program and/or the VP, will have the authority to consult with the HR Partner to enforce section 2 of the Gundersen Health System Discipline Policy (HR-235). Please reference GHS Policy HR-235 for further information. The provisions of this policy are constructed in good faith and shall be interpreted in a manner consistent with the best interests of all parties, including GHS. While adhering to the principles of due process, the fact that certain provisions of this Policy are not strictly followed will not invalidate any final action.

## Responsibilities

**The Administrative Director of Medical Education** is responsible for the development and oversight of this policy.

**The VP of Medical Education** may need to step in to review the PD decisions, dismissal, or termination of appointment recommendations, and designate a review committee to review findings.

**Internship Program Co-Directors:** Maintain and routinely review performance of interns in training. Report performance and/or personnel issues to the VP as well as Human Resources.

## Approval Signatures

Step Description	Approver	Date
Policy Review Committee	Thomas Hodde: HR Program Consultant	7/23/2024
	Jennifer Lee: Director	7/22/2024

## Applicability

Gundersen