



LA CONCORDIA

Wellness Center

Your wellness, your health, you deserve it

Doctoral Internship Manual

In Clinical Psychology

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1. Introduction

1.1. Welcome

Dear Valued Intern,

Welcome to La Concordia Wellness Center! We are thrilled to have you as a part of our training program.

We at La Concordia Wellness Center are committed to providing the best care, acknowledging that every individual is unique. Concordia means creating a harmony between the brain, the heart, the mind, and the soul. Our work consists of enhancing awareness on how to stay in harmony with these four elements for overall wellness. We are in the field of mental health and wellness to provide better understanding to our patients about how conditions can be treated without attaching any stigma to them; remembering that behind any condition lies an important person.

Our non-profit organization concentrates on helping underrepresented communities maximize access to mental health care and wellness. The awareness of mental health issues is important to facilitate treatment; thus, La Concordia's goal is to help address the issues related to limited access to mental health care due to systemic and structural complexities. Our non-profit agency also believes in training future practicing clinicians. We strive to build an exemplary training program focusing on the vision, mission, and values of our center. Our training program focuses on offering weekly didactic trainings by all of our licensed clinicians as well as providing relevant seminars by other professionals in our county. We look forward to being a part of your training journey and helping you grow into being a well-rounded clinician.

This Doctoral Internship Manual contains general information on our policies, practices, and benefits. Please read it carefully. If you have questions regarding the handbook, please discuss them with the Program Manager.

Welcome aboard. We look forward to working with you!

Sincerely,

The Training Director

1.2. Training Program Mission and Values

Aims:

To train future clinicians in providing culturally competent care and overall wellness to those in need of mental health services.

La Concordia values:

Diversity: Contra Costa is multicultural, so are we, La Concordia prides itself in being diverse and rich in cultures and languages. Our clinicians come from different ethnicities and backgrounds who also speak different languages.

Trust: La Concordia believes in building the trust of our clients by creating a compassionate safe space where one can be vulnerable and heard. Addressing vulnerability of our underinvested communities due to lack of trust in the system is paramount in trusting the process to wellness.

Holistic Health: We address each person as a whole. We understand that achieving overall wellbeing is complex, thus our approach aims to incorporate knowledge and education on all aspects of health.

Education: We, as mental health clinicians, are forever students of the brain, body, and mind as recognizing the cause and effect of how a condition affects either one of these domains is crucial in understanding the treatment. At La Concordia, we value education as a resource for wellness in our community.

1.3. Services Offered at La Concordia

La Concordia Wellness Center focuses on the mental health and wellness of children (starting at age 6), adolescents, adults, the elderly, and families. Besides helping our clients address all major emotional/psychological issues such as depression, anxiety, trauma, etc., our areas of expertise include the treatment and management of chronic conditions and chronic pain from using behavioral medicine techniques, to up-to-date medication recommendations. The inclusion of an integrated approach is important for the remission of symptoms and overall healing. Our team of practitioners believe it is important to understand how medications work in the brain and the body, and how the body and mind react to them. In our practice, we are committed to working not only on acute conditions but also in the prevention of illness for better overall wellness. For this reason, incorporating a more holistic view to wellness, that is not limited to western approaches but also incorporating other healing modalities such as yoga, acupuncture, meditation, extra-curricular activities (i.e., exercise), mindfulness, and education on sleep hygiene and nutrition are all fundamental to our mission.

All services and the entirety of the training program are conducted out of 1070 Concord Ave STE 105, Concord, CA, 94520

2. PROGRAM CURRICULUM

2.1. Training Schedule Overview

In the beginning of the training year, the site training director will notify the intern's graduate school that the intern has successfully begun the internship program. In creating a schedule for the intern, the site training director works closely with the intern and departmental staff. The intern's schedule may require weekend work hours, but in no case shall the intern be scheduled to work more than 40 hours per week.

At least Forty five (45) percent of the intern's time (approximately 18 hours per week) is spent providing direct services to patients. Services may include but are not limited to intake evaluations, individual and family psychotherapy, facilitation of treatment groups and psychological assessment.

Profession Wide Competencies

To ensure the quality of the personal and professional development of La Concordia's interns, each intern will have an individual learning plan that is developed by the intern and their individual

supervisor at the beginning of the training year. This plan will be reviewed quarterly to ensure the training meets the needs of the intern. Emphasis is placed on the following APA Profession-Wide Competencies:

1. Integration of Science and Practice
2. Individual and Cultural Diversity
3. Ethical and Legal Standards
4. Professional Values, Attitudes and Behaviors
5. Communication and Interpersonal Skills
6. Assessment
7. Intervention
8. Consultation and Interdisciplinary Skills

The remaining hours are spent in the following activities:

The following times are mandatory for Interns and Trainees to participate in. All meetings are hybrid (both in person and Zoom). If for any reason they are unable to attend, they need to contact the Program Manager prior to the meetings as attendance is required.

- Seminar (September-May)
Wednesdays: 10am-11:30am
- Seminar (June-August)
Wednesdays: 10am-12pm
- Didactics (September-May)
Thursdays: 10am-11am
- Staff Meeting and Case Disposition
Thursdays: 12pm-2pm
- Group Supervision
Fridays: 9am-11am
- Therapy to individuals, couples, and families
Approximately 18hrs (45% of a 40hr work week) of the scheduled time in the clinic will be dedicated to Clinical face to face interactions with patients
- Individual Supervision
2hrs of supervision will be scheduled weekly with the individual supervisor

2.2. Administrative Support and Office Resources

Administrative support staff can be utilized when necessary to help schedule patient appointments, respond to phone messages, track patient paperwork, and provide assistance with other tasks as needed.

Every intern will be provided an office with a desktop computer to enable them to work on- site/in the office or remotely as their schedule requires. Interns can access the internet, TherapyNotes through the computers provided or use their own if they wish.

Microsoft Office software such as Word, OneDrive, Teams, PowerPoint and Outlook are available once the intern is given a La Concordia email account.

Interns are provided with offices to meet with patients, receive and answer phone messages and schedule appointments within a confidential setting. Larger rooms are available to provide group or family therapy. Interns working with children have access to playrooms. Additional training resources include audio and video recording equipment. This will have to be requested in advance.

LCWC also has conference rooms, communal areas for use of staff and interns. the conference room for didactics, seminars, staff meetings and group supervision is located in Ste 200. The common area for interns and trainees is located in Ste 169, in this suite there is a library and children's play room. Administrative staff is located in Ste 105 should the interns need support or assistance during the intern's tenure at LCWC. Located in Dr. Fernandez's office are the materials for psychological assessments. LCWC uses its Multicultural Wellness Center (STE 222a) for group therapy and support groups. In this same suite we offer all our holistic services all of LCWC's clinicians and staff have access to the holistic services offered by LCWC.

2.3. Diversity, Inclusion and Culturally Competent Care

Diversity issues are considered in every aspect of training as this center serves a wide range of diverse populations that include differences in age, disability status, race, ethnicity, immigration experiences, gender, gender identity and expression, sexual orientation, religion and spirituality, socioeconomic status, and family life. Through targeted didactic and seminar topics, supervision and therapeutic work, interns are informed and sensitized to diversity issues to prepare them to provide effective and culturally responsive mental health treatment.

La Concordia Wellness Center's Training Program focuses strongly on Equity, Inclusion and Diversity. The structure of the program offers advanced trainings that promote cultural competency and cultural sensitivity. The trainings are designed to support all interns and provide them with a safe space to reflect on their experiences without judgment and in a culturally affirming matter.

During group supervision, the licensed clinicians offer guidance and support separate from the supervision that is provided by the individual clinical supervisors. Supervision combines the sharing of hands-on experience and thoughtful reflection with the underlying goal of promoting a training climate supportive of diversity. La Concordia supports doctoral interns in their professional development by creating a model that helps them prepare for entry-level career positions, prepare for private practice, define future goals, network, and hone work/life balance.

2.4. Psychotherapy Training

Interns are taught evidence-based psychotherapy practices through didactic, seminars and case supervision while enhancing education about the foundational aspects of psychology and psychotherapy. Interns are heavily educated about all the clinical aspects of therapy from a biopsychosocial component understanding the importance of clinical symptoms and diagnoses. In addition, they are trained in Feedback Informed Care (FIC), an incorporated approach to mental health treatment in which patients and therapists use patient reported information to track treatment progress.

At the discretion of the Clinical/Training Director, a doctoral intern may facilitate a therapy group alone, provided that the following conditions are met:

- The intern's level of competence, as determined by observation of their clinical skill and evidence of previous experience, deems them appropriate to work alone
- Supervision of the group and the closing of notes is assumed by an appropriate supervisor
- The primary purpose of facilitating a group alone is for training and professional development
- The intern never works alone in the clinic without a licensed staff member readily available for consultation or crisis assessment if necessary

2.5. Seminars and Didactic Training

Regularly scheduled didactic trainings and seminars are held weekly. Intern attendance is mandatory. Current seminar schedules and a list of speakers and topics will be emailed to the current cohort by the Program Manager.

2.6. Psychological Assessment Training

Training in psychological assessment involves understanding referral questions, selecting assessment methods, collecting background information, administering, scoring, and interpreting measures, formulating hypotheses, assigning diagnoses, and recommending interventions.

Interns will only conduct assessments in which they have appropriate training. Assessments which are specific to various Health Psychology applications such as in primary care settings should only be conducted and interpreted under the direction of supervisors who have the appropriate training. Psychological assessment supervisors are to abide by the regulations established by the APA Ethical Principles of Psychologists and Code of Conduct Sections 9.01-9.11 on Assessment. All assessments, write-ups, and feedback sessions should be completed within a timely and appropriate manner.

Testing materials are available onsite and include standard psychometric measures. In addition, interns have access to commonly used paper and pencil measures. The psychological assessment supervisor is responsible for training the intern in testing procedures and determining the appropriate measures to be used in each case.

Each intern is required to obtain written informed consent from the patient for psychological assessment which states that the intern is in training and working under the license of a staff psychologist supervisor.

3. SUPERVISION OF PROFESSIONAL HOURS

3.1. BOP Supervisor Training Requirement

The Doctoral Internship programs comply with supervision guidelines stipulated by the California Board of Psychology (BOP). The BOP requires that all primary supervisors complete a six-hour continuing education course in supervision each licensing cycle (every 2 years). For more information go to:
https://www.psychology.ca.gov/applicants/sup_checklist.pdf

3.2. BOP Supervision Agreement Form

The BOP Supervision Agreement form must be completed, signed, and dated by both the primary supervisor and the intern no later than the first day of the doctoral internship program. To print a copy of the BOP Supervision Agreement form, go to:
https://www.psychology.ca.gov/forms_pubs/sup_agreement.pdf

3.3. Supervised Professional Experience Log

It is the responsibility of the intern to keep a weekly supervised professional experience log with hours verified by the supervisor's signature to document program participation. Some interns utilize the time2track online tracking system, while others use a paper log.

The California Board of Psychology requires 1500 hours of supervised professional experience at the doctoral level to qualify for licensure, while other states may require more hours.

3.4. BOP Verification of Experience

The California BOP Verification of Experience form, along with the Supervision Agreement form, is submitted to the BOP by the intern at the end of the training year. The APPIC member title must be indicated on both the Verification of Experience form

and the Supervision Agreement form. Secondly, the medical center where the actual training took place must be indicated also. To print a copy of the BOP Verification of Experience form, go to:

https://www.psychology.ca.gov/forms_pubs/prior_verofexp.pdf

3.5. Methods of Supervision

All interns receive regularly scheduled individual supervision for two hours per week throughout the training year with their primary supervisor.

The functions of both the primary and secondary supervisors include monitoring patient welfare, enhancing the intern's clinical skills, promoting professional growth, evaluating their progress, and providing feedback. The primary supervisor serves as both mentor and monitor/guide for the intern's clinical work and professional development during their tenure at LCWC. The delegated (secondary) supervisor also monitors the intern's caseload and provides feedback and guidance. In accordance with California state law, each intern has access to their primary or delegated (secondary) supervisor at all times, via phone, in case of emergency.

Interns spend two hours a week in group supervision facilitated by licensed psychologists who may be the training director or primary, secondary or specialty supervisors. Topics include case consultation, supervision training, psychological assessment, program evaluation, professional development, interdisciplinary communication and systems issues and multicultural competence and diversity awareness.

Evaluation of intern professional competencies must be based on direct observation at least once each quarter. Direct observation by the supervisor may be completed by audio-video streaming, or through audio or video recording. If requested to audiotape, videotape, or otherwise record a patient session, interns should download the Permisson_for_AUDIO_VIDEO_adult-1 form to be signed by intern and patient, from the "Library" section in TherapyNotes

4. EVALUATION OF PROFESSIONAL COMPETENCIES

4.1. Doctoral Intern Individual Training Contract

Within the first week of the training year, each intern collaborates with their primary supervisor in developing an Individual Training Contract. This contract builds upon information obtained from the first meeting with the supervisor and allows the intern and supervisor to develop a training plan to address any competency areas identified from this meeting as requiring additional training focus. This collaborative process is

flexible, and goals can be revised at quarterly intervals.

The training contract also identifies the intern's primary and delegated (secondary) supervisors and lists intern responsibilities and expectations for the training year. By signing this contract, the intern acknowledges receipt of the Policy and Procedure manual, has reviewed section V of the Individual Training Contract entitled "Responsibilities and Expectations of Intern" and understands the basic requirements of program participation.

4.2. Doctoral Intern Competencies Evaluation

In order to ensure that interns meet all of the program's goals and requirements, each intern will be formally evaluated by their primary supervisor at least once per semester (and more frequently if a competency concern arises).

The primary supervisor is instructed to rate the intern on all competency elements listed for each of the specific competencies on the evaluation form used by La Concordia. For any competency element in which an intern is rated less than a "3" ("Meets Expectations") the primary supervisor must provide a narrative explanation. In addition, ratings of "1" ("Inadequate") or "2" ("Needs Improvement") on any competency element on the evaluation will trigger remedial and possibly corrective action.

Since the program provides increasingly complex training over the course of the year, an intern who is deemed to "meet expectations" at the beginning of the year, would be functioning at a higher level than when deemed to "meet expectations" at the end of the year. An intern performing at level "3" at the end of the year has met the competency requirements for entry level of independent practice in the profession.

At each semesterly interval, the primary supervisor will meet with the intern to review the completed evaluation form. In addition, copies of the evaluations are sent to the intern's graduate school. The intern may respond in writing to supervisor feedback on the evaluation. If the intern wishes to challenge any ratings on the evaluation, they are directed to follow the Intern Due Process procedure.

4.3. Certificate of Program Completion

To receive a Certificate of Completion at the end of the training year, the intern must attain a score of "3" ("Consistently Meets Expectations") for each competency element on the evaluation by the end of the second semester. The intern must also have accrued a minimum of 1,500 hours of supervised training by the end of the training year. Notification of program completion is sent to the intern's graduate school.

Interns who voluntarily separate from the training program before the end of the training year will be considered to have resigned and will not receive a Certificate of Completion.

Any request for verification of the performance of the intern during the time in the program, will only reflect those hours rated as being at a satisfactory level of performance according to the intern's supervisor.

4.4. Doctoral Intern Program Surveys

Each intern evaluates the training program at mid-year and at the end of the training year. The Intern Program evaluation form allows the intern to assess their own experience of the program by the same parameters that are used in the Intern's evaluation form (IEF). The data from this survey, along with the IEF ratings, provides valuable feedback to the training faculty and is used to make modifications to program procedures.

4.5. Doctoral Intern Evaluation of Supervisors

Each intern evaluates their supervisors semi-annually based on rotations using the Supervisor Evaluation Form. Data from this form is reviewed by the site training director and is kept confidential; however, ratings of "1" (Does Not Meet My Expectations) or "2" ("Needs Improvement") will be brought to the supervisor's attention. Interns and supervisors should review the Supervisor Evaluation Form at the beginning of the training year to ensure a common understanding of the supervisory standards of the program. They are then encouraged to use the criteria on this form as a guide for discussion throughout the year to identify training needs, especially at the time of the intern's Evaluation.

5. DUE PROCESS: REMEDIATION AND APPEAL PROCEDURES

The Internship program's due process policy provides a framework to address the situation in which an intern is not meeting expected performance standards. It ensures that the training program adheres to fair and unbiased evaluation and remediation procedures, and that the intern is given an opportunity to appeal the program's decisions. For all remedial actions, training faculty will maintain clear written records (e.g., memos and/or narratives of meetings) describing what transpired, including any plans that were implemented, with time frames and outcomes.

5.1. Rights of Doctoral Interns

- To be informed of the expectations, goals and objectives of the doctoral internship program.
- To be trained by professionals who behave in accordance with APA ethical guidelines.

- To be treated with professional respect in keeping with their advanced level of training.
- To have individual training needs identified and documented in the training contract.
- To receive ongoing evaluation that is specific, respectful, and pertinent. To be informed in a timely manner if they are not meeting program standards.
- To engage in ongoing evaluation of the doctoral training program. The training program will conduct formal surveys twice a year.
- To utilize due process procedures for concerns related to performance standards so that the intern's viewpoint is taken into account, and so that the intern has an opportunity to remediate problems in order to successfully complete the program.
- To utilize grievance procedures to resolve non-evaluation-related problems and disputes that may arise during the training year.
- To be granted privacy and respect for one's personal life including respect for one's uniqueness and differences.

5.2. Responsibilities of Doctoral Interns

- To function within the bounds of all state and federal laws and regulations, as well as APA ethical and professional practice standards. All interns are expected to refer to and abide by the APA's Ethical Principles and Code of Conduct.
- To adhere to the policies and procedures of LCWC This information is presented during the orientation period and can be accessed by contacting the Program Manager.
- To adhere to the policies and procedures of the LCWC Doctoral Internship Programs as outlined in this manual; and to adhere to the policies and procedures of the intern's assigned work department or clinic.
- To demonstrate skill proficiency in clinical services and ethical practice as established by the APA's Standards of Accreditation.
- To attend and participate in didactic trainings and seminars, staff meetings, case conferences and individual and group supervision

meetings.

- To maintain professional, collegial interactions in the work place, including offering constructive feedback and being receptive to feedback.

5.3. Doctoral Internship Program Responsibilities

- To provide interns with experience necessary to obtain Minimum Levels of Achievement: completing a minimum of 1500 hours of supervised clinical practice within 12 months, demonstrating competency in core psychological areas like assessment, diagnosis, treatment planning, and intervention, while meeting the requirements for licensure eligibility in the state of California.
- To provide information regarding laws, standards, and guidelines governing the practice of clinical psychology and to provide forums to discuss the implementation of such standards.
- To ensure that faculty and staff engage with interns and each other in a respectful, professional, and ethical manner.
- To promote diversity and inclusion in the work place.
- To provide high quality clinical experiences, supervision, and didactic trainings and seminars.
- To provide opportunities for interns to offer input into the training program, including their supervisory experiences, through meetings with the training director and quarterly written evaluations.
- To communicate program expectations, and standards for evaluation, including how interns will be evaluated and by whom.
- To provide interns with written and verbal feedback in weekly supervision meetings and in quarterly written evaluations so that they may improve their skills and address competency problems in a timely manner.
- To communicate with interns' graduate schools about how they are progressing in training and whether they are meeting the minimum levels of achievement. To inform interns' graduate schools of any remedial actions taken regarding interns' performance.
- To implement due process and grievance procedures for problems related to intern competencies and professional functioning, program standards, and interpersonal disputes. To allow interns sufficient time to appeal decisions with which they disagree.
- To make decisions about intern remediation, probation, suspension, and termination utilizing multiple sources of information. To develop remediation plans for performance deficiencies with time frames, and to clearly communicate to interns the consequences of not correcting the deficiencies.
- To make accommodations for special training needs for interns who qualify under the American with Disabilities Act.

5.4. Definition of Problematic Behavior

A problematic behavior interferes with intern professional competence and is defined by:

- An inability or unwillingness to acquire and integrate professional standards into one's repertoire of professional behavior.
- An inability to and/or unwillingness to acquire professional skills in order to reach an acceptable level of competence; and/or
- An inability and/or unwillingness to control personal stress, psychological problems and/or excessive emotional reactions which interfere with professional functioning.

Training faculty should use their professional judgement in determining when an intern's behaviors, attitudes or characteristics have become problematic. Problematic Behaviors may include the following features:

- The intern does not acknowledge, understand, or address the problem when it is identified.
- The problem is not merely a reflection of a skill deficit, which can be rectified by clinical or didactic training.
- The quality of services delivered by the intern is sufficiently negatively affected
- The problem is not restricted to one area of professional functioning.
- A disproportionate amount of attention and time by training faculty is required to address the problem,
- The intern's behavior does not change as a function of feedback, remediation efforts, and/or time.
- The behavior has potential legal or ethical ramifications if not addressed
- The behavior potentially causes harm to patients.
- The behavior negatively impacts the public view of Kaiser Permanente.
- The behavior negatively impacts the training cohort or clinic staff.

5.5. Informal Discussion

The first step in the due process procedure is Informal Discussion which is used to address performance or behavioral concern(s) that do not rise to the level of a Problematic Behavior. The intern's supervisors are responsible for providing the intern with feedback about their progress during regularly scheduled supervision meetings throughout the year. If a concern arises, the supervisors should inform, advise, and/or coach the intern to enable them to successfully address the concern. The intern should be given a time frame in which to correct the concern and may be provided with additional support over subsequent supervision meetings. Any staff member who witnesses the intern go against a policy or procedure should inform the intern's

supervisors or the site training director. The intern's supervisors and/or site training director will document their discussion(s) with the intern in their supervision notes. These notes will not become part of the intern's official training file.

5.6. Formal Notification and Hearing

If an intern's professional conduct, professional development or performance issues persist even after an Informal Discussion; or if the intern is not meeting minimum levels of achievement (i.e., is receiving ratings of less than 3 on any element of the Competencies Evaluation); or if the intern demonstrates a Problematic Behavior at any point in the training year, then formal due process procedures will be initiated as follows:

- The intern's supervisor or other concerned staff member(s) will first consult with the site training director to discuss the issue. The site training director may interview others with relevant information and/or may seek the guidance of HR administrators. The training director will Notify the intern in writing that a performance or behavioral concern has been raised to the level of formal review and that a Hearing will be held.
- As soon as possible, but no later than ten (10) business days after the intern receives a Notice of Hearing, the Training director (or their designee) will convene the Hearing Committee and schedule a Hearing. The committee will include site training director and the primary supervisor, and may also include other members of the training faculty, departmental staff, and/or an HR consultant. The intern may also invite any appropriate licensed LCWC staff member to attend.
- At the Hearing, committee members will discuss the competency issue(s) fully, openly, and candidly with the intern. The intern has a right to dispute or explain the concern(s) presented and may provide a written statement or supporting materials of their own. Within five (5) business days from the completion of the Hearing, the committee will determine an Outcome and the site director and primary supervisor will present the Outcome to the intern. Possible hearing outcomes are as follows:
 - The intern was found to be meeting expected performance and conduct standards and no further action is needed.
 - The intern has demonstrated performance or conduct concerns, but they were not significant enough to warrant formal remediation. The concerns will be monitored according to the Informal Discussion process described above.
 - The intern has demonstrated minor competency deficits that have resulted in rating(s) of 2 - "Needs Improvement" - on one or more elements of the

CE. To address these deficits, the intern will be placed on a remediation plan. This plan may also be implemented when an intern is found to be below the minimum levels of achievement in their knowledge or skill because of a gap in graduate school training (for example, insufficient preparation in psychological testing or diagnostics).

- The intern has demonstrated major competency deficits that have resulted in rating(s) of 3 – “Inadequate – on one or more elements of the CE. An intern with serious performance or conduct problems may be placed on Probation, which is also a form of remediation.
- The intern has demonstrated major competency deficits involving potential harm to a patient, gross misconduct, legal violations, or serious policy or ethical code violations. Any intern demonstrating such behaviors may be suspended from the training program. The site training director and training faculty will follow LCWC HR policies in this situation.

5.7. Outcome of the Hearing

The Training Director and primary supervisor will communicate the Outcome of the Hearing to the intern both verbally and in writing. The intern will be presented with an “Acknowledgement of Hearing Notice” for outcomes resulting in 1) no further action/return to routine supervision or 2) Remediation Plan. The essential components of an Acknowledgement of Hearing Notice are:

- Date of the Hearing and names of the participants.
 - Description of the intern’s unsatisfactory performance and date in which the concerns were first brought to the intern’s attention.
 - Identification of the targeted competency area(s) and competency element(s).
 - Decision of the Hearing Committee with regard to the competency concerns and whether a remediation plan was recommended.
 - When Focused Competency Guidance is recommended - an outline of measures to be undertaken to remediate performance, including but not limited to schedule modification, provision of opportunities for extra supervision and/or attendance at additional seminars and/or other training activities, and/or recommendations of training resources.
 - Criteria and procedures for determining whether the problem has been adequately addressed.
 - Consequences for unsuccessful outcome (which may include the initiation of Probation)
 - Timeline for Remediation plan completion.
-
- For an outcome resulting in Probation, the intern will be presented with a “Letter of Warning”. For an outcome resulting in Suspension, the intern will be presented with a “Suspension Letter”.
 - The intern, training director, and primary supervisor will be required to sign

the letter or notice. A copy of the document will be provided to the intern and to the intern's graduate school and will be placed in the intern's training file. If an intern is dissatisfied with the Hearing Committee's decision, the intern may appeal the decision by following the Appeal Procedure.

5.8. Remediation Plan

Remediation Plan is typically triggered when an intern receives one or more ratings of "2" ("Needs Improvement") for any competency element on the Competencies Evaluation (CE) during quarters one and two. The "2" rating indicates minor competency deficit(s) that may be easily ameliorated by added training. However, during the third or fourth quarters of the training year, if an intern receives a "2" for any Competency elements measured, the supervisor may initiate Probation depending on the element or number of elements needing improvement. A focused competency guidance can also be initiated mid- quarter if competency issues have been identified by the training team.

During the hearing outcome meeting, the primary supervisor and the site training director will present a Remediation Plan to the intern which also includes a recording of the concern(s) in narrative form on a CE. The primary supervisor will review the competencies to be targeted and the remedial actions recommended by the Hearing Committee (for example, didactic trainings, closer mentoring, structured readings, simulated clinical practice etc.).

The Hearing Committee may also recommend Schedule Modification which includes several possible and concurrent courses of action such as: (a) increasing the amount of supervision, either with the same or different supervisor(s); (b) changing the format, emphasis and/or focus of supervision; (c) recommending personal therapy; (d) reducing the intern's clinical or other workload; and (e) requiring specific academic course work.

- The guidance plan should include a timeline for reassessment of the identified concerns. If the timeline calls for reassessment before the next quarterly CE, the CE is utilized at the appointed time and follow-up remarks are detailed. In the next sequential quarterly CE, further improvements should be noted. When all unmet performance standards have been rectified, the primary supervisor, in consultation with the secondary supervisor and site training director, will remove the intern from Focused Competency Guidance and indicate the date of successful completion on the guidance plan document.
- The Remediation Plan must be signed and dated by the primary supervisor and intern during the initial and follow-up meetings. The primary supervisor and training director will provide the intern and the intern's graduate school with copies of the plan. A copy will also be placed in the intern's training

file.

5.9. Probation

Interns who have serious competency-related concerns, or who have not corrected identified concerns after a Remediation Plan may be placed on Probation. The decision to place an intern on Probation is made by the Hearing Committee; or in the case of an intern who is still not meeting minimum levels of achievement at the time of a Remediation Plan review, by the training director and primary supervisor. Probation will include more closely scrutinized supervision for a specified length of time. The intern's graduate school will be notified of the Probation plan determination as soon as possible.

To initiate Probation, training director and primary supervisor will compose a "Letter of Warning" to the intern outlining the program's concerns. This letter will also describe the consequence(s) of the intern's failure to show immediate and substantial improvement in the identified competency areas within the planned time frame. Improvement must be evidenced by CE rating(s) of "3" ("Consistently Meets Expectations") in the targeted areas.

The essential components of a **Letter of Warning** are:

- Date of the Hearing and names of participants (if applicable).
- Description of the intern's unsatisfactory performance and date in which the concerns were first brought to the intern's attention.
- Identification of the targeted competency area(s) and competency element(s)
- Additional reasons for probation, if applicable:
 - Severity of the violation
 - Number of violations and the dates that the violations occurred
 - Whether the violation was part of a pattern or practice of improper behavior or non-compliance
 - The intern's past history of non-compliance
 - Whether the intern should have known the applicable policies, rules, or regulations
 - Whether the violation was intentional or negligent
 - Whether the action appeared to be committed for personal gain
- Notification that this Probationary action may impact whether the intern's supervised hours will be found to be satisfactory
- An outline of measures to be undertaken to remediate performance including any required Schedule Modification
- Criteria and procedures for determining whether the problem has been adequately addressed
- Consequences of an unsuccessful outcome (may include denial of certificate)

and letter of completion, extension of the Probationary period, Suspension and/or Termination/Program Dismissal)

- Timeline for Probation plan completion:
 - The training director and primary supervisor will meet with the intern to review the Letter of Warning to ensure that the intern fully understands the terms of the Probation. The intern will be given an opportunity to respond to the letter and to the group's concerns. The training director will inform the intern's graduate school of the proceedings of the meeting. The intern and the intern's graduate school will be provided with copies of the letter and a copy will be placed in the intern's training file. If an intern is dissatisfied with the Probation decision, the intern may appeal it by following the Appeal Procedure.
 - During the Letter of Warning meeting, the training director and the primary supervisor will also present a Probation plan to the intern that includes a recording of the competency concern(s) and remedial actions recommended by the site director and training faculty. The plan must be signed and dated by the intern, the primary supervisor, and the training director. Copies will be provided to the intern and to the intern's graduate school and a copy will be placed in the intern's training file. Within the time frame outlined in the plan, the intern's primary and secondary supervisors will evaluate the intern's progress and the primary supervisor will document their findings on the outcomes section of the plan.
 - When all unmet performance standards have been rectified, the training director and primary supervisor will remove the intern from Probation and the training director and primary supervisor will indicate the date of successful completion on the plan document. If it is determined that insufficient progress has been made by the end of the probationary period, the training director will submit a written explanation of the concerns to the intern. In addition, the training director may recommend an extension of the Probation or may initiate Suspension. Copies of the written explanation letter will be provided to the intern and to the intern's graduate school and a copy will be placed in the intern's training file.

5.10. Suspension

Suspension of an intern is a decision made by either the Hearing Committee; or in the case of an intern who is not meeting minimum levels of achievement at the time of the Probation plan review, by the training director and the Primary Supervisor. The intern's graduate school will be notified of the Suspension as soon as possible. The intern may be suspended from all or part of their usual and regular assignments in the training program. Suspension of an intern may be initiated as a result of the following:

- The competency area(s) and/or behavior(s) of concern indicate(s) a question of patient endangerment, gross misconduct and/or criminal behavior. Factors to be

considered include but are not limited to those listed in the Letter of Warning above.

- After the probationary period, the intern has not met expectations for improvement in the identified competency domain(s) (i.e., the intern continues to receive CE ratings of 1, “inadequate”).
- The intern has failed to comply with state or federal laws, LCWC and/or doctoral training program policies and procedures and/or professional association guidelines.
- The removal of the intern from the clinical service is in the best interests of the intern, patients, staff and/or the training program.
- To initiate Suspension, the training director and primary supervisor, will compose a Suspension Letter to the intern which addresses the following:
 - Date of the Hearing and names of participants (if applicable).
 - Description of intern’s unsatisfactory performance and dates in which the concerns were first brought to the intern’s attention.
 - Identification of violation(s), including corresponding competency area(s) and competency element(s).
 - Notice of Suspension and expected duration.
 - Notice of whether the suspension is paid or unpaid.

The training director and primary supervisor will meet with the intern to review the Suspension Letter to ensure that the intern fully understands the terms of the Suspension. The intern may invite any appropriate licensed LCWC staff member to attend the meeting. The training director and primary supervisor may either remove the intern temporarily from direct service activities due to concerns for the welfare of patients or may place the intern on an administrative leave of absence. The intern will be given an opportunity to respond to the concerns presented and to the Suspension decision.

The training director or the primary supervisor will inform the intern’s graduate school of the proceedings of the meeting. The intern and the intern’s graduate school will be provided with copies of the Suspension Letter and a copy will be placed in the intern’s training file. If an intern is dissatisfied with the Suspension decision, the intern may appeal it by following the Appeal Procedure.

In the case of a suspension from direct service activities only, the training director will develop a remediation plan following the procedures and utilizing the Probation plan document. The intern may continue to participate in non-direct service activities such as individual and group supervision, staff meetings, and didactic trainings and seminars as long as the intern’s participation is productive for the intern and for the training cohort. The plan must be signed by the training director, primary supervisor, and intern. Copies will be provided to the intern and the intern’s graduate school and a copy will be placed in the intern’s training file.

If all identified concerns are rectified within the agreed upon time frame, the training director will determine when the intern can resume direct service activities under probationary monitoring until minimum levels of achievement are met. A new Probation plan should be developed following the procedures described above.

In the case of a very serious violation, the training director may choose, with or without warning, to notify the intern that they have been placed on administrative leave from the training program or to terminate the intern from the training program

5.11. Termination and Program Dismissal

Termination of an intern will be initiated if the competency area(s) and/or behavior(s) of concern indicate(s) a certainty of patient endangerment, gross misconduct and/or criminal behavior on the part of the intern. Termination may also be invoked for any other egregious offense on the part of the intern, including but not limited to:

- Violation of federal or state laws, including HIPAA, and in which imminent harm to a patient either physically or psychologically is a major factor.
- Serious violation of LCWC policies, including internship training program policies and procedures or professional association guidelines.
- Serious violation of the APA Ethical Principles and Code of Conduct.
- Unprofessional, unethical, or other behavior that is otherwise considered unacceptable by the training program.
- Attempts at remediation, after a reasonable period of time, have not rectified the competency problems.
- The intern is unable to complete the program due to serious physical, mental or emotional illness.
- Serious or repeated act(s) or omission(s) compromising acceptable standards of patient care.

Termination involves the permanent withdrawal of all privileges associated with the La Concordia Wellness Center's Doctoral Internship Programs in Clinical Psychology. The decision to dismiss an intern is not made lightly and is made by the Training director with notice given the intern's graduate school, and to APPIC. The intern will be informed of the decision in a letter that addresses the following:

- Description of intern's unsatisfactory performance.
- Identification of violation(s), including corresponding competency area(s) and competency element (may include details listed in the Suspension Letter).
- Notice of Termination of Employment.

- Notice that the intern is also dismissed from the internship program and will not receive a certification or letter of completion.
- Expectation that the intern will complete all patient documentation prior to leaving the training site.

If the intern does not wish to appeal the termination decision, the intern may choose to resign from the training program and from LCWC.

5.12. Appeal Procedure

The purpose of the Appeal Procedure is to provide a mechanism by which all decisions made by the training program regarding an intern's Competencies Evaluation and Remediation plans, as well as an intern's status in the program, can be promptly and fairly reviewed. Interns will not be subject to reprisal in any form as a result of participating in the Appeal Procedure.

Note: This policy does not apply to nor can it be utilized by an intern who is terminated as the result of an HR decision. In those instances, the intern would follow LCWC HR policy.

In order to challenge a training program decision, the intern must notify the training director in writing as soon as possible after receipt of the decision. This written notification shall include the following information:

- Name of intern
- Current date
- Date and description of decision under dispute
- Explanation of intern's disagreement with decision, including supporting information
- Description of intern's objective/goal for resolving the dispute

As soon as possible, but no later than fifteen (15) business days after receipt of the intern's written notification, the training director (or their designee) will call the Hearing Committee to convene. Every effort will be made to expedite the committee formation and hearing process. The Hearing Committee:

- Will be composed the training director, primary and secondary supervisor.
- In no case shall any training faculty who has participated in the decision in question up to this point be a member of the committee.

Once the Hearing Committee has been convened, a hearing shall be conducted within fifteen (15) business days. The intern has the right to hear all facts related to the concerns, as well as to present supporting materials of their own. The intern also has the right to dispute or explain the concerns presented.

Within ten (10) business days from completion of the hearing, the Hearing Committee will make a final decision. Decisions will be made by majority vote of the committee members and be submitted to the intern and to the intern's graduate school.

6. DISPUTE RESOLUTION POLICIES

6.1. Doctoral Intern Grievance and Appeal Overview

It is the goal of the Doctoral Internship Programs in Clinical Psychology to provide a learning environment that fosters professional interactions among training faculty and interns based on mutual respect. However, it is possible that situations will arise that cause interns to file grievances. This policy is intended to facilitate the prompt resolution of a problem identified by an intern as requiring attention. Interns will not be subject to reprisal in any form as a result of utilizing this grievance procedure.

The Grievance and Appeal procedures are not intended to be used by an intern to challenge the results of a Competencies Evaluation or any remedial or corrective action. To appeal any of these program decisions, the intern is directed to follow the Intern Due Process.

6.2. Verbal Grievance Communication

If an intern has any disagreement with a supervisor, another staff member, another intern or a matter of program policy, they will be encouraged to communicate openly with the person involved, if possible, or with their own supervisor first about the issue. At any time before or during this process the intern may discuss their concerns directly with the training director, President-CEO, Program Manager, and/or a Human Resources consultant.

The intern is responsible for communicating openly, specifically describing how they intend to gain satisfactory resolution to the problem. If the intern has chosen to address the issue with their supervisor, the supervisor is responsible for exploring the issue fully with the intern and offering ideas for resolving it. If the intern is dissatisfied with the outcome of the verbal discussion, the intern is directed to follow the procedure for Written Grievance Communication, as outlined below.

6.3. Written Grievance Communication

If the Verbal Grievance Communication has been utilized and the issue has not been resolved to the intern's satisfaction, the intern may submit a written document to the training director, President-CEO, and/or Program manager (or designee) describing the grievance in detail. However, in no case shall any staff member who has participated in the Verbal Grievance Communication process also participate in the review of the Written

Grievance Communication.

As soon as possible, but no later than ten (10) business days from receipt of the written grievance, the training director, President-CEO, and/or program manager should meet with the intern (and supervisor, if appropriate) to discuss the issue. After this discussion, the training director, President-CEO, and/or program manager will, if necessary, conduct an investigation and respond to the intern's grievance in writing within ten (10) business days. If the intern is dissatisfied with the outcome of the review of the Written Communication, the intern is directed to follow the procedure for Grievance Appeal, as outlined below.

6.4. Doctoral Intern Grievance Appeal

If the Verbal and Written Grievance Communication procedures have been utilized and the issue has not been resolved to the intern's satisfaction, the intern may file a written Grievance Appeal with the training director and/or department manager(s). The training director may choose to appoint/designate the assistant training director or a senior service area training director to review the appeal and render a decision.

This appeal shall include the following information:

- Name of intern and training location
- Current date
- Copy of the original written grievance
- Explanation of intern's disagreement with the decision and basis for appeal
- Resolution sought

As soon as possible, but no later than ten (10) business days from receipt of the grievance appeal, the training director, President-CEO, and/or program manager should meet with the intern to discuss the issue. In no case shall any staff member who has participated in the grievance processes up to this point also participate in the review of the appeal. After the discussion, the training director, President-CEO, and/or program manager, if necessary, conduct an investigation and respond to the intern's appeal in writing within ten (10) business days.

Before responding to the intern, the training director will meet with the site training director and/or department manager and supervisor to review the dispute and discuss the issues involved. Additionally, before responding, the President-CEO (or designee) will review their findings with the intern's graduate school field placement coordinator and a Human Resources consultant and/or LCWC legal counsel, as appropriate.

6.5. Training Supervisor Dispute Resolution Overview

LCWC provides processes to secure impartial and prompt resolutions of disputes among

staff members. If a training supervisor has a disagreement with another training supervisor or intern, or wishes to dispute a matter of program policy, they should utilize the process outlined below. Training supervisors will not be subject to reprisal in any form as a result of participating in this process.

At any time, the supervisor may discuss their concerns about the issue directly with a Human Resources consultant. If the issue pertains to the department but not to the training program, the supervisor is directed to follow LCWC policy and contact their local HR consultant for guidance.

6.6. Supervisor Dispute Resolution Procedure - Step 1

The training supervisor should first discuss the problem with the person with whom the problem is identified, if possible. The training supervisor is responsible for specifically describing how they intend to gain satisfactory resolution in the area identified.

If the initial discussion proves unsatisfactory to the supervisor, they should address the issue fully with the training director. The training director is responsible for offering ideas for resolving the issue and for providing the training supervisor with a time frame in which to expect a response if one cannot be provided immediately. The training director will then gather any information needed and respond to the training supervisor verbally or in writing. The response will be given in a timely manner, usually within ten (10) business days after the discussion.

6.7. Supervisor Dispute Resolution Procedure Step 2

If Step 1 has been completed and the issue has not been resolved to the supervisor's satisfaction, the supervisor may contact the training director and President-CEO and detail their concerns. The President-CEO and training director should follow the procedure outlined in Step 1, including meeting with the supervisor, establishing a time frame for response, conducting any necessary investigation, and responding to the supervisor. The response should be given within twenty (20) business days after the discussion.

6.8. Anti-Retaliation and Whistleblower Policy

This policy is designed to protect trainees/interns and address La Concordia Wellness Center's commitment to integrity and ethical behavior. In accordance with anti-retaliation and whistleblower protection regulations, La Concordia Wellness Center will not tolerate any retaliation against an trainee/intern who:

- Makes a good faith complaint, or threatens to make a good faith complaint, regarding the suspected Agency or trainee/intern violations of the law, including discriminatory or other unfair employment practices;

- Makes a good faith complaint, or threatens to make a good faith complaint, regarding accounting, internal accounting controls, or auditing matters that may lead to incorrect, or misrepresentations in, financial accounting;
- Makes a good faith report, or threatens to make a good faith report, of a violation that endangers the health or safety of an trainee/intern, patient, client or customer, environment or general public;
- Objects to, or refuses to participate in, any activity, policy or practice, which the trainee/intern reasonably believes is a violation of the law;
- Provides information to assist in an investigation regarding violations of the law; or
- Files, testifies, participates or assists in a proceeding, action or hearing in relation to alleged violations of the law.

Retaliation is defined as any adverse employment action against an trainee/intern, including, but not limited to, refusal to hire, failure to promote, demotion, suspension, harassment, denial of training opportunities, termination, or discrimination in any manner in the terms and conditions of employment.

Anyone found to have engaged in retaliation or in violation of law, policy or practice will be subject to discipline, up to and including termination of employment. Trainees/interns who knowingly make a false report of a violation will be subject to disciplinary action, up to and including termination.

Trainees/interns who wish to report a violation should contact their supervisor or Joanne Rodriguez directly. Trainees/interns should also review their state and local requirements for any additional reporting guidelines.

La Concordia Wellness Center will promptly and thoroughly investigate and, if necessary, address any reported violation.

Trainees/interns who have any questions or concerns regarding this policy and related reporting requirements should contact their supervisor, the Program Manager, or any state or local agency responsible for investigating alleged violations.

7. DOCTORAL INTERN HIRING PROCESS, COMPENSATION AND BENEFITS

7.1. Program Admission Requirements

Academic Degree

All interns must be enrolled in a doctoral degree program accredited by the APA. All interns, furthermore, must be in advanced standing (e.g., coursework and comprehensive exams completed) in their Ph.D., PsyD, or Ed.D. programs in Clinical, Counseling, or School Psychology.

Prior Clinical Training

All interns must have prior experience delivering outpatient psychotherapy services as a psychology practicum trainee/extern within a mental health agency or hospital setting. Intern applicants must have accrued at least 500 hours of prior intervention experience and 40 hours of prior psycho-educational assessment experience in order to apply for a LCWC internship.

Candidate Qualifications

Our program seeks candidates who have demonstrated competencies in individual and group psychotherapy, different therapeutic modalities, evidence-based treatments, and integrated psychological assessment. Candidates should also have experience working with diverse patient populations. In addition, our programs seek candidates who have demonstrated scholarship and leadership abilities in achieving their academic program goals.

7.2. Application and Interview Process

All applicants must complete the APPIC Application for Psychology Internships (AAPI) and must participate in the APPIC Internship Matching Program. Applicants must be authorized to work in the United States without an employer-sponsored visa or student visa.

The internship programs encourage applications from individuals who come from diverse, underserved, or disadvantaged backgrounds. The Training Director will ensure that all applicants who meet the general criteria for the program are included in the selection pool.

Applications are reviewed by training faculty and qualified candidates are invited to schedule an interview by the "Interview Notification Date," established in mid-December by APPIC, unless there is an exceptional reason to use another date. In scheduling the interviews, training directors work closely with department managers. Interviews take place in January for the term beginning in August or September.

7.3. Welcome Letter and Values Statement

On APPIC Match date, which occurs in late February, the training director sends a "Contingent Offer Letter" to the matched candidates upon their acceptance of the job offer. This letter contains employment contingencies, pay rate and benefits enrollment information.

A "Welcome Letter" is sent out to the intern by the site training director, usually within a few days after the APPIC Match date. Each intern must sign and date the Welcome Letter, indicating their acceptance of the parameters of the training program.

7.4. LCWC Employment Statement

The term of the doctoral internship is one year, and it is expected that the intern will remain in the program for the duration of the term. There is no expectation that after the one-year doctoral internship is completed, LCWC will accept a former intern into a postdoctoral residency or hire an intern into a staff psychologist position. Interns will be expected to apply and compete for open positions like any other qualified candidate.

Both the intern and LCWC enter into the employment relationship voluntarily. Termination of an intern's employment by LCWC may be based on but not limited to ethics violations, significant and consistent competency concerns and/or failure to meet labor standards. Interns who choose to resign before the end of the training year are expected to give a thirty (30) calendar day written notice to the site training director prior to the effective date of resignation.

7.5. Salary and Benefits Package

Doctoral interns are employed by LCWC and are paid every two weeks. Paychecks are deposited directly into bank accounts by arrangement with LCWC. The current stipend is \$69155 per year.

LCWC does not pay overtime, however an adjusted work schedule can be considered if an intern needs to work more than 8hrs in a day. For approval contact the Program Manager prior to working more than 8hrs a day.

For detailed information on intern benefits, including medical and dental insurance coverage, contact the Program Manager.

7.6. Time Off for Doctoral Dissertation Defense

Each intern is eligible to receive 8 hours' paid time off (coded as RES or equivalent) to attend their doctoral dissertation defense.

7.7. Professional Liability Insurance

All LCWC interns are required to have their own Professional Liability Insurance.

8. Working Conditions and Business Hours

8.1. Business Hours

La Concordia Wellness Center is open for business from:

- Monday 9:00 AM to 6:00 PM
- Tuesday 9:00 AM to 6:00 PM

- Wednesday 9:00 AM to 6:00 PM
- Thursday 9:00 AM to 6:00 PM
- Friday 9:00 AM to 6:00 PM

This excludes holidays recognized by La Concordia Wellness Center. The standard workweek is 40 hours.

The Program Manager will advise trainees/interns of their scheduled shift, including starting and ending times. Business needs may necessitate a variation in your starting and ending times as well as in the total hours you may be scheduled to work each day and each week.

8.2. Security and Safety Protocols

The purpose of La Concordia Wellness Center's security policy is to protect Agency assets and to maintain a safe working environment for all trainees/interns.

Facility Access:

All regular La Concordia Wellness Center trainees/interns will be issued a key to gain access to La Concordia Wellness Center facilities. Trainees/interns who are issued keys are responsible for their safekeeping. All lost or stolen keys must be reported to the Program Manager as soon as possible. Upon separation from La Concordia Wellness Center, and at any other time upon La Concordia Wellness Center's request, all keys must be returned to the Program Manager.

Closing Procedures:

The last trainee/intern, or a designated trainee/intern, who leaves the office at the end of the business day assumes the responsibility to ensure that: all doors are securely locked; the alarm system is armed; thermostats are set on appropriate evening and/or weekend setting; and all appliances and lights are turned off except for the lights normally left on for security purposes. Trainees/interns are not permitted on company property after hours without prior written authorization from the Program Manager.

Panic Button Procedure

Each therapy room comes equipped with a Panic Button. These buttons are to be used when a clinician feels that they are in physical danger from a patient. Once the button is pressed a signal will go to the Receptionist who will then notify the Program Manager, Executive Director or any available clinician or trainee/intern that the button has been pressed. The Program Manager, Executive Director, or any available clinician or trainee/intern will then stand by the phone to call 911 while the Receptionist knocks on the door marked by the Panic Alarm. The Receptionist will then open the door and assess the situation. Should the situation warrant a call to 911, the Receptionist will raise her hand and point upwards to notify the person by the phone that a call needs to be made.

Threats Made by a Patient

In the event that a patient threatens a clinician or the clinic, treatment of that patient is immediately terminated. The clinician or the Receptionist will call 911. The Program Manager and the immediate supervisor are to be notified immediately.

8.3. Room Assignments

The Receptionist is responsible for managing room assignments. Clinicians are expected to abide by their working schedules when scheduling patients. Any appointments that are scheduled outside of the working schedule for that clinician will be subject to rescheduling if a room is not able to be secured. The Receptionist works on room assignment schedules every Monday at 8:30am. Room assignments are posted on the tack board by the reception desk. Should you need a specific office due to patient disability or patient age (I.E. Playroom) this needs to be requested via email to the Receptionist. Should there be any reason to change that assigned office that day a request needs to be submitted prior to the change being enacted. Should changes to the working schedule be made, the clinician is required to notify both the Receptionist and the Program Manager.

8.4. Emergency Closing

At times, emergencies such as severe weather, fires, or power failures can disrupt company operations. In extreme cases, these circumstances may require the closing of a work facility. The decision to close or delay regular operations will be made by La Concordia Wellness Center management.

When a decision is made to close the office, trainees/interns will receive official notification from the Program Manager.

9. Trainee Conduct

9.1. Disciplinary Action

Disciplinary action at La Concordia Wellness Center is intended to fairly and impartially correct behavior and performance problems early on and to prevent reoccurrence. Disciplinary action may involve any of the following: verbal warning, written warning, communication with your school, and termination from the program, depending on the severity of the problem and the frequency of occurrence. La Concordia Wellness Center reserves the right to administer disciplinary action at its discretion and based upon the circumstances.

La Concordia Wellness Center recognizes that certain types of trainee/intern behavior are serious enough to justify termination from the program, without observing other disciplinary action first.

These violations include but are not limited to:

- Workplace violence
- Harassment
- Theft of any kind
- Insubordinate behavior

- Vandalism or destruction of company property
- Divulging La Concordia Wellness Center business practices or any other confidential information

9.2. Confidentiality

La Concordia Wellness Center takes the protection of Confidential Information very seriously. “Confidential Information” includes, but is not limited to, computer processes, computer programs and codes, customer lists, customer preferences, customers’ personal information, company financial data, marketing strategies, proprietary production processes, research and development strategies, pricing information, business and marketing plans, vendor information, software, databases, and information concerning the creation, acquisition or disposition of products and services.

Confidential Information also includes the Agency’s intellectual property and information that is not otherwise public. Intellectual property includes, but is not limited to, trade secrets, ideas, discoveries, writings, trademarks, and inventions developed through the course of your employment with La Concordia Wellness Center and as a direct result of your job responsibilities with La Concordia Wellness Center. Wages and other conditions of employment are not considered to be Confidential Information.

To protect such information, trainees/interns may not disclose any confidential or non-public proprietary information about the Agency to any unauthorized individual. If you receive a request for Confidential Information, you should immediately refer the request to your supervisor and the Program Manager.

The unauthorized disclosure of Confidential Information belonging to the Agency, and not otherwise available to persons or companies outside of La Concordia Wellness Center, may result in disciplinary action, up to and including termination of employment. If you leave the Agency, you may not disclose or misuse any Confidential Information.

This policy is not intended to restrict an trainee/intern’s right to discuss, or act together to improve, wages, benefits and working conditions with co-workers or in any way restrict trainees’/interns’ rights under the National Labor Relations Act.

Questions regarding this policy should be directed to the Program Manager.

9.3. The Health Insurance Portability and Accountability Act of 1996 (HIPAA)

The Health Insurance Portability and Accountability Act of 1996 (HIPAA) and its implementing regulations restrict La Concordia Wellness Center’s (“Company”) abilities to use and disclose protected health information (PHI).

Protected Health Information

Protected health information means information that is created or received by the Company and relates to the past, present, or future physical or mental health condition of a Patient/Client

("Participant"); the provision of health care to a participant; or the past, present, or future payment for the provision of health care to a participant; and that identifies the participant or for which there is a reasonable basis to believe the information can be used to identify the participant. Protected health information includes information of persons living or deceased. Some examples of PHI are:

- Participant's medical record number
- Participant's demographic information (e.g. address, telephone number)
- Information doctors, nurses, and other health care providers put in a participant's medical record
- Images of the participant
- Conversations a provider has about a participant's care or treatment with nurses and others
- Information about a participant in a provider's computer system or a health insurer's computer system
- Billing information about a participant at a clinic

Any health information that can lead to the identity of an individual or the contents of the information can be used to make a reasonable assumption as to the identity of the individual

It is the Company's policy to comply fully with HIPAA's requirements. To that end, all staff members who have access to PHI must comply with this HIPAA Privacy and Security Plan. For purposes of this plan and the Company's use and disclosure procedures, the workforce includes individuals who would be considered part of the workforce under HIPAA such as trainees/interns, volunteers, board members, and other persons whose work performance is under the direct control of 1st Step, whether or not they are paid by 1st Step. The term "trainee/ intern" or "staff member" includes all of these types of workers.

No third-party rights (including but not limited to rights of participants, beneficiaries, covered dependents, or business associates) are intended to be created by this Plan. La Concordia Wellness Center reserves the right to amend or change this Plan at any time (and even retroactively) without notice.

All staff members must comply with all applicable HIPAA privacy and information security policies. If after an investigation you are found to have violated the organization's HIPAA privacy and information security policies, then you will be subject to disciplinary action up to termination or legal ramifications if the infraction requires it.

Privacy Officer

The Program Manager will be the HIPAA Privacy Officer for La Concordia Wellness Center. The Privacy Officer will be responsible for the development and implementation of policies and procedures relating to privacy, including but not limited to this Privacy Policy and the Company's use and disclosure procedures. The Privacy Officer will also serve as the contact person for participants who have questions, concerns, or complaints about the privacy of their PHI.

Incident Response Team

The Incident Response Team is comprised of the CEO, the Program Manager, and additional members deemed appropriate on an ad hoc basis in the reasonable judgment of the Privacy Officer. In the event that a security incident results in a wrongful disclosure of PHI, the Privacy Officer, in conjunction with the Incident Response Team will take appropriate actions to prevent further inappropriate disclosures. In addition, Human Resources and Legal may be consulted as part of the review team to assist in the review and investigation of privacy incidents when required. If the Privacy Officer and Incident Response Team have not resolved the incident, the Privacy Officer shall involve anyone determined to be necessary to assist in the resolution of the incident. If participants need to be notified of any lost/stolen PHI, the Privacy Officer will send PHI Theft/Loss Disclosure Letters to all possible affected individuals.

Workforce Training

It is the Company's policy to train all members of its workforce who have access to PHI on its privacy policies and procedures. All staff members receive HIPAA training. Whenever a privacy incident has occurred, the Privacy Officer in collaboration with management will evaluate the occurrence to determine whether additional staff training is in order.

Depending upon the situation, the Privacy Officer may determine that all staff should receive training that is specific to the privacy incident. The Privacy Officer will review any privacy training developed as part of a privacy incident resolution to ensure the materials adequately address the circumstances regarding the privacy incident and reinforce the Company's privacy policies and procedures.

Safeguards

The Company has established technical and physical safeguards to prevent PHI from intentionally or unintentionally being used or disclosed in violation of HIPAA's requirements. Technical safeguards include limiting access to information by creating computer firewalls. Physical safeguards include locking doors or filing cabinets and periodically changing door access codes. Additionally, all staff members can only access PHI by using their own login information. Firewalls ensure that only authorized trainees/interns will have access to PHI, that they will have access to only the minimum amount of PHI necessary for their job functions, and that they will not further use or disclose PHI in violation of HIPAA's privacy rules.

Privacy Notice

The Privacy Officer is responsible for developing and maintaining a notice of the Company's privacy practices that describes:

- the uses and disclosures of PHI that may be made by the Company;
- the individual's rights; and
- the Company's legal duties with respect to the PHI.

The privacy notice will inform participants that the Company will have access to PHI. The privacy notice will also provide a description of the Company's complaint procedures, the name and telephone number of the contact person for further information, and the date of the notice.

The notice of privacy practices will be individually delivered to all participants:

- on an ongoing basis, at the time of an individual's enrollment into a Company program or at the time of treatment and consent; and
- within 60 days after a material change to the notice.

Complaints

The Privacy Officer will be the Company's contact person for receiving complaints. The Privacy Officer is responsible for creating a process for individuals to lodge complaints about the Company's privacy procedures and for creating a system for handling such complaints. A copy of the complaint form shall be provided to any participant upon request.

Sanctions for Violations of Privacy Policy

Sanctions for using or disclosing PHI in violation of this HIPAA Privacy Plan will be imposed in accordance up to and including termination.

Mitigation of Inadvertent Disclosures of Protected Health Information

La Concordia Wellness Center shall mitigate, to the extent possible, any harmful effects that become known to it because of a use or disclosure of a Participant's PHI in violation of the policies and procedures set forth in this Plan. As a result, if an trainee/intern becomes aware of a disclosure of protected health information, either by a staff member of the Company or an outside consultant/contractor that is not in compliance with this Policy, immediately contact the Privacy Officer so that the appropriate steps to mitigate the harm to the participant can be taken.

No Intimidating or Retaliatory Acts; No Waiver of HIPAA Privacy

No trainee/intern may intimidate, threaten, coerce, discriminate against, or take other retaliatory action against individuals for exercising their rights, filing a complaint, participating in an investigation, or opposing any improper practice under HIPAA. No individual shall be required to waive his or her privacy rights under HIPAA as a condition of treatment, payment, enrollment or eligibility.

Electronic Health Records

Just like paper records, Electronic Health Records must comply with HIPAA, and other state and federal laws. Unlike paper records, electronic health records can be encrypted - using technology that makes them unreadable to anyone other than an authorized user - and security access parameters are set so that only authorized individuals can view them. Further, EHRs offer the added security of an electronic tracking system that provides an accounting history of when records have been accessed and who accessed them.

Access Authorization

La Concordia Wellness Center will grant access to PHI based on their job functions and responsibilities. The Privacy Officer and senior management is responsible for the determination of which individuals require access to PHI and what level of access they require through discussions with the individual's manager and or department head. The Program Manager will keep a record of authorized users and the rights that they have been granted with respect to PHI.

9.4. Personal Property

Trainees/interns should use their discretion when bringing personal property into the workplace. La Concordia Wellness Center assumes no risk for any loss or damage to personal property. Additionally, trainees/interns may not possess or display any property that may be viewed as inappropriate or offensive on La Concordia Wellness Center premises.

9.5. Use of Company Property

Company property refers to anything owned by the company: physical, electronic, intellectual, or otherwise. The use of company property is for business necessity only. When materials or equipment are assigned to a trainee/intern for business, it is the trainee/intern's responsibility to see that the equipment is used properly and cared for properly. However, at all times, equipment assigned to the trainee/intern remains the property of the Agency, and is subject to reassignment and/or use by the Agency without prior notice or approval of the trainee/intern. This includes, but is not limited to, computer equipment and data stored therein, voicemail, records, and trainee/intern files. LA CONCORDIA WELLNESS CENTER has created specific guidelines regarding the use of company equipment. Below is a list of trainee/intern responsibilities and limitations with regards to company property.

Personal use of company property:

Company property is not permitted to be taken from the premises without proper written authority from company management.

Company Tools:

All necessary tools are furnished to trainees/interns in order to assist them in their required duties. Each trainee/intern is, in turn, responsible for these tools. Tools damaged or stolen as a result of a trainee/intern's negligence will, to the extent permitted by federal, state and local law, be charged to the trainee/intern.

Care of Company Property:

Office areas should be kept neat and orderly and all equipment should be well-maintained. The theft, misappropriation, or unauthorized removal, possession, or use of company property or equipment is expressly prohibited. Any action in contradiction to the guidelines set herein may result in disciplinary action, up to and including termination of

employment.

9.6. Visitors in the Workplace

To ensure the safety and security of La Concordia Wellness Center and its trainees/interns, only authorized visitors are permitted on Agency premises and in Agency facilities.

All visitors must enter through the main reception area and sign in and out at the front desk. All visitors are also required to wear a “visitor” badge while on La Concordia Wellness Center premises. Authorized visitors will be escorted to their destination and must be accompanied by a representative of the Agency at all times.

9.7. Computer, Email, and Internet Usage

La Concordia Wellness Center offers a company email address to all of its trainees. These emails are meant for internal communications within the organization and for basic communication regarding scheduling with patients. Email is not meant to be used to exchange confidential information between patients and clinicians.

9.8. Dress Code

The purpose of La Concordia Wellness Center's personal appearance policy is to ensure a safe and sanitary workplace for all trainees/interns. La Concordia Wellness Center strives to maintain a professional working environment that promotes efficiency, positive trainee/intern morale and promotes a professional image. During business hours or when representing La Concordia Wellness Center, trainees/interns are expected to use common sense and good judgment in order to meet the goals of this policy.

Generally, trainees/interns should be in business professional attire. While not intended to be an all-inclusive list, the examples below are considered appropriate workplace attire:

- Slacks
- Blouses
- Button-down shirts
- Suit and tie

Generally, trainees/interns should maintain a clean and neat appearance and should refrain from wearing stained, wrinkled, frayed, or revealing clothing to the workplace. Trainees/interns are urged to use their discretion when determining what is appropriate to wear to work. Trainees/interns who wear inappropriate attire to work may be sent home to change their clothing.

La Concordia Wellness Center understands that in certain situations, the Agency may need to make exceptions to this policy based on an trainee/intern's religion, disability, or other characteristic protected under federal, state or local law. In accordance with all applicable laws, the Agency will make every effort to provide reasonable

accommodation as necessary unless doing so would cause an undue hardship on La Concordia Wellness Center.

Casual Dress Days

La Concordia Wellness Center allows trainees/interns to dress in casual business attire each Friday.

interns must still project a professional image while dressing in a more casual manner. An trainee/intern's casual dress must be clean, neat, and professional. It is never appropriate to wear stained, frayed, torn, or revealing clothing to the workplace. Denim is acceptable on casual dress days. If you are in a position that requires a meeting with outside customers or clients, appropriate business attire is recommended. La Concordia Wellness Center understands that in certain situations, the Agency may need to make exceptions to this policy based on an trainee/intern's religion, disability, or other characteristic protected under federal, state or local law. In accordance with all applicable laws, the Agency will make every effort to provide reasonable accommodation as necessary unless doing so would cause an undue hardship on La Concordia Wellness Center.

Questions regarding appropriate workplace attire should be directed to the Program Manager.

10. Staff Contact information

Executive Director and Training Director

Dr. Manuel Fernandez

Manuel.fernandez@laconcordiawellness.org

Please schedule appointments for supervision with Ana.

Program Manager, HIPAA Privacy Officer, HR, and Custodian of Records

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Multicultural Wellness Center Program Coordinator

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Receptionist

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