

University of North Dakota

University Counseling Center

Doctoral Internship in Health Service Psychology

Brochure

The University of North Dakota

Founded in 1883, the University of North Dakota (UND) is the state's oldest and largest university offering over 225 accredited on-campus and online degrees. The university is a recognized leader in engineering, medicine, aviation, space and unmanned aircraft systems. With 13,876 students, UND offers over 260 student clubs and organizations and has 17 NCAA Division Lathletic teams.

Land Acknowledgement

Today, the University of North Dakota rests on the ancestral lands of the Pembina and Red Lake Bands of Ojibwe and the Dakota Oyate - presently existing as composite parts of the Red Lake, Turtle Mountain, White Earth Bands, and the Dakota Tribes of Minnesota and North Dakota.

We acknowledge the people who resided here for generations and recognize that the spirit of the Ojibwe and Oyate people permeates this land. As a university community, we will continue to build upon our relations with the First Nations of the State of North Dakota - the Mandan, Hidatsa, and Arikara Nation; Sisseton-Wahpeton Oyate Nation; Spirit Lake Nation; Standing Rock Sioux Tribe; and Turtle Mountain Band of Chippewa Indians.

Mission

To provide exceptional educational experiences that enrich the lives of North Dakotans and the global community through excellence in teaching, innovative research, and meaningful engagement.

Vision

To inspire a sense of wonder, a love of discovery, and a commitment to serve.

A sense of wonder reflects our belief that critical thinking and dynamic educational experiences are rich soil for cultivating engaged citizens who will be lifelong learners. By fostering a love of discovery, we advance creativity, research, and innovation as ways to overcome our greatest challenges. By affirming our commitment to serve, we aspire to help make our communities better. None of this would be possible without a deep commitment to our students, employees, alumni, and greater community. We express this commitment by ensuring the University of North Dakota is a place where everyone knows they belong — a place that embraces diverse peoples, perspectives, and ideas.

This plan will take a collective effort, one in which each of us leads as we are able. As leaders we're defined by the characteristics we embody and the unique perspectives we share with the world. We all have the capacity to lead, as evidenced by our community's civic engagement, sense of responsibility, willingness to try new ideas and adapt, and

most important, our ability to listen to and value the perspectives of others and lead with integrity.

The University Counseling Center

Mission

Offering accessible and confidential mental health and substance use services to support and assist students at the University of North Dakota.

Vision

Empowering all clients to reach their fullest potential by providing a range of therapeutic interventions and growth opportunities.

Values

Community – A spirit of collaboration and connectedness across the university and beyond

The UCC will live out Community by:

- Serving intentionally as an accessible resource for students and the UND campus
- Increasing student awareness of opportunities and resources to engage them in UND and Greater Grand Forks community activities
- Establishing and maintaining strong relationships within our team, UND, and the Greater Grand Forks community

Discovery – An enthusiasm for inquiry, creativity, and innovation

The UCC will live out Discovery by:

- Creating a safe place for self-exploration for the students we serve
- Adapting to the needs of our students to create relevant support and programming
- Fostering a climate of openness, respect, and celebration for the aspirations and strengths of all

Diversity – An understanding and appreciation of diverse people, experiences, and ideas

The UCC will live out Diversity by:

- Intentionally recognizing, respecting, and celebrating every person's uniqueness
- Willingness to adapt our environment and professional approach and skills to better meet a diverse client population

Inclusivity – A welcoming, inclusive, and supportive environment for all

The UCC will live out Inclusivity by:

- Empowering all through compassionate accountability by honoring strengths and growth
- Cultivating an environment of respect, acceptance, and belonging

Lifelong Learning – A passion for learning, civic engagement, and community leadership

The UCC will live out Lifelong Learning by:

- Nurturing relationships that stimulate and contribute to the growth of the Counseling profession
- Creating opportunities for personal and professional growth for all staff, trainees, and the campus community

Internship Training Model, Aim and Competencies

The UND UCC Doctoral Psychology Internship Program's aim is to train and develop culturally responsive and competent entry-level psychologists skilled in the profession-wide competences to serve a diverse public in various settings, including and beyond, a university counseling center. Our General Practitioner Training Model rests in an educational philosophy grounded in scientific principles and evidence-based practices supporting profession-wide competencies interns develop and integrate into their professional identity. It is our aim that interns develop a strong professional identity grounded in science, ethical practice, integrity, and a commitment to lifelong learning. The training team is committed to providing flexible, challenging, supportive, developmentally appropriate, and respectful supervision and mentorship.

Interns gain experience in intervention, assessment, outreach and programming, supervision provision, and consultation while working with individuals from diverse cultural backgrounds, lifestyles, and identities. The UCC is committed to excellence in providing a range of training activities that scaffold in depth and skill for each intern. Efforts are made to support the individualization of training experiences with respect to the experience and professional goals of the intern.

The Counseling Center is aware that professional growth and personal development are intertwined, and consequently is supportive of opportunities for the intern's own personal growth. Upon completion of the internship, the developing professional should have sufficient experience in a university counseling center and general psychology practices to confidently and competently carry out the responsibilities of an entry level health service psychologist in various settings. Our training is focused on the following profession-wide competencies:

- 1. Research
- 2. Ethical and Legal Standards
- 3. Individual and Cultural Diversity
- 4. Professional Values and Attitudes
- 5. Communication and Interpersonal Skills
- 6. Assessment
- 7. Intervention
- 8. Supervision
- 9. Consultation and Interprofessional/Interdisciplinary Skills

Professional Activities

Doctoral Interns participate in an initial orientation to the UCC prior to the start of the fall semester, during which the intern's initial level of clinical development is reviewed through discussions between interns and their supervisors. Interns meet on a regular basis with the UCC Assistant Director of Training (once monthly year-round) and Doctoral Psychology Internship Program Director (bi-weekly year-round) to discuss their experience and progress, offer programmatic feedback, and address any concerns or issues pertaining to internship experiences. The UCC provides services in-person and virtually.

- 1. Individual Psychotherapy The largest quantity of the intern's time involves providing therapy on a one-to-one basis with students utilizing both short and long-term therapy models. The UCC is flexible in providing the most appropriate treatment for the client's needs and presentation.
- 2. Group Psychotherapy The UCC offers therapy groups to students each semester. These are often topical, and/or support group-based, such as stress reduction or the graduate student support group. Groups may be psychoeducational, process-oriented, or a combination of both. Interns may participate as co-facilitators with a staff member or peer, or conduct groups on their own, based on interest, clinical skill, and client/student interest.
- 3. Diagnostic Interviews Interns conduct initial assessment sessions on a regular basis through which they develop skills in clarifying presenting concerns, formulating case conceptualizations and diagnostic impressions, and developing appropriate treatment plans.
- 4. Psychological Assessment Interns have opportunities to administer and interpret cognitive, learning, and personality assessments to support diagnosis and aid in treatment planning. The nature and extent of assessment opportunities is determined by past training and experience with specific assessments. Additionally, interns will have exposure to aviation psychological assessments

and their unique considerations.

- 5. Crisis Intervention Interns provide crisis services and risk assessment to students. Small blocks of time are reserved on all staff and intern schedules for services as a walk-in/crisis provider. When not scheduled for a crisis appointment, this time may be utilized for documentation or other administrative tasks. These services are provided during the normal workday. There are no after-hours/on-call duties at this time.
- 6. Consultation/Outreach Programming Interns provide psychoeducational workshops and participate in campus outreach programming, such as Green Bandana (suicide prevention), emotional first aid, stress management and more. In addition, interns serve as consultants to campus members when needed to support the emotional and mental well-being of students. Interns are given the opportunity to develop outreach that is relevant to the campus community and to their professional skills and interests.
- 7. Supervision Provision— The UCC is a practicum site for Master's and Doctoral students from the UND Counseling, Counseling Psychology, and Clinical Psychology programs. Interns will provide supervision to doctoral-level trainees utilizing a vertical learning model, where the intern's supervision provision is supervised by the intern's licensed psychologist clinical supervisor. Supervisors at all levels are responsible for providing consistent informal and formal evaluative feedback; reviewing, editing, and signing progress notes and clinical documentation; reviewing recorded therapy sessions; and providing education and consultation to supervisees.
- 8. Research The UCC recognizes the importance of research in the development of a professional psychologist and interns are encouraged and given time to pursue research interests. This may include analysis and writing for dissertation or publication. The time allotted for research may vary, noting that times of peak clinical demand may reduce time for research, while winter and summer breaks have less clinical demand and thus may allow for more time engaged in research activities. Interns participate in journal review and discussion to stay engaged with up-to-date science-based/evidence-based practices. Finally, interns may also complete research of interest that supports the UCC mission and is collaboratively identified and supported by the UCC Director, Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director.

Supervision and Training Activities

1. Individual Supervision – 2 hours per week. Interns receive 2 hours of scheduled supervision per week with their assigned primary supervisor, a licensed psychologist. The primary supervisor assignments will change at the mid-point of

the training year to facilitate the intern experiencing a broad range of theoretical and clinical approaches, as well as supervisory styles. Thus, the intern will have exposure to two different primary supervisors during their training year. Informal supervision will also occur via consultations with primary supervisors, training team staff, and other licensed staff clinicians. Interns are also provided with additional supervision to support and oversee psychological assessment, supervision provision, and co-facilitation/facilitation of group psychotherapy. Additional supervision regarding clinical work in which another psychologist or licensed clinician who has special expertise may also be provided when appropriate (for example, aviation psychology, substance use, working with veterans). Reviewing recorded therapy sessions is a valuable piece of supervision at the UCC.

- 2. Supervision of Supervision 1 hour per week. Interns receive supervision of their supervision provision to a trainee by a licensed psychologist for one hour per week. This may take the form of individual or group supervision of supervision with the intern's primary supervisor, the Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director. Interns receive training in the practice of clinical supervision, which includes a teaching component and direct supervision of the intern's clinical practice of supervision. This includes review of video of supervision meetings between the intern and the trainee to whom they provide supervision.
- 3. Clinical Staffing and Case Presentation/Consultation Conference (Group Supervision) 2 hours per week. The UCC conducts weekly clinical staffing and case consultation conference with all licensed providers and trainees, where client cases are discussed and diagnostic, intervention, referral, and/or other appropriate consultation related to clinical services is provided. These meetings are led by a licensed psychologist.
- 4. Student Health Services Integrated Staffing On a bi-weekly basis during the fall and spring semesters the UCC conducts an hour-long integrated clinical staffing and case consultation meeting with Student Health Services including those providing psychiatry and medication management services to clients. This will increase interns' familiarity with a multidisciplinary approach and improve consultation and interprofessional/ interdisciplinary skills and communication.
- 5. Assessment Supervision approximately 1 hour per week bi-weekly. Interns receive supervision of their administration, scoring, report-writing, and feedback delivery of psychological assessments provided to UND students/clients. This supervision is provided by a licensed psychologist. Additional consultation is also available as needed regarding psychological assessment services interns provide.

- 6. Training Seminar/Didactics 8 hours per month on average (typically 2 hours per week). Training seminar/didactics will include a range of advanced topics that will increase in skill and depth as the intern progresses through the internship year. These may include:
 - a. Ethics
 - b. Licensure
 - c. Grand Rounds with the UND School of Medicine & Health Sciences/Department of Psychiatry & Behavioral Science
 - d. Counseling in Higher Education/University Counseling Centers
 - e. Assessment
 - f. Supervision
 - g. Mindfulness
 - h. Mind-Body Medicine
 - i. Substance Use/Addiction Counseling
 - j. Aviation Psychology and Assessment
 - k. Cultural Humility and Culturally-Competent Counseling
 - I. Utilizing Expressive Arts in Counseling
 - m. Other topics of relevance and interest
- 7. Journal Discussion Group 1 hour per month. Staff and interns choose a journal article to discuss related to best practices based in scientific research. Interns will alternate with staff to present articles and lead the hour-long discussion. Articles are to be sent to interns and staff at least 1 week prior to the discussion meeting.
- 8. Meeting with the UCC Assistant Director for Training 1 hour per month. Interns meet together with the Assistant Director for Training to gain support and discuss internship experiences, progress, goals, and professional development, as well as to provide programmatic, training, and supervision feedback, and discuss any concerns they may have about their training experiences or the internship program. These meetings also serve as a safe space for interns to discuss and gain additional support for professional development issues and interests.
- 9. Meeting with the Doctoral Psychology Internship Program Director 1 hour every other week. Interns meet together with the Doctoral Psychology Internship Program Director to gain support and discuss internship experiences, progress, goals, and professional development, as well as to provide programmatic, training, and/or supervisor feedback, and discuss any concerns they may have about their training experiences or the internship program. These meetings also serve as a safe space for interns to discuss and gain additional support for professional development issues and interests.

Estimated Weekly Hours (37.5 hour work week)

Individual Counseling (includes on-going therapy and initial assessment sessions)	10 – 12 hours	
Group Counseling	1 – 2 hours	
Crisis Services (varies by week)	0 – 3.5 hours	
Assessment		
(varies based on need and assessment)	0 – 4 hours	
Outreach	0 – 2 hours	
(varies based on need/scheduling)		
Clinical Services	11 – 23.5 hours	
Individual Primary Supervision	2 hours	
Individual Supervision of Supervision	1 hour	
Group Assessment Supervision	1 hour (bi-weekly)	
Group Supervision (Clinical Staffing and Case	2 hours	
Presentation/Consultation Meeting)		
Supervision of Trainee	1 hour	
Supervision Activities	6 – 7 hours	
Training, Seminars, Didactics	2 – 5 hours	
(varies by week)		
Research	0 – 2 hours	
(varies based on need/scheduling)		
Training & Learning Activities	2 – 7 hours	
Documentation and Case Management	3 – 5 hours	
(includes session and treatment planning)		
Supervision Administrative Tasks	2 – 4 hours	
(review of notes and session/supervision videos)		
Administrative Tasks	5 – 9 hours	
Meeting with Internship Program Director	1 hour (bi-weekly)	
Meeting with Assistant Director of Training	1 hour (per month)	
Intern Process and Support Meeting	1 hour (per month)	
Internship Program Meetings	0 – 3 hours	

Diversity and Training

An essential skill as a general practitioner is training and experience working with individuals from diverse cultural backgrounds, abilities, identities, and lifestyles. This is a skill and characteristic that is greatly valued at the University of North Dakota University Counseling Center. Identity, ability, cultural, and lifestyle diversity are evident among clients seeking treatment at the UCC and among the student population. Infused throughout the training program are opportunities to engage with consideration, development, application, and growth of these skills. Additionally, we provide focused seminars in which interns are challenged and expected to consider how their own unique characteristics impact the services they provide; develop the skills necessary to

competently serve diverse clients, supervisees, and colleagues with cultural humility; and develop an active and critically reflective lens to identify areas of growth throughout their professional career.

Eligibility and Application Procedures

Eligibility and Stipend

All course work, practicum experiences, and completion of qualifying exams required for the doctorate should be completed by the beginning of the internship year. The internship year begins on August 1 and ends on July 31 of the following year. Applications are due by November 15. The stipend for the 12-month internship is \$40,000. Benefits include holidays (approximately 10); health insurance (shared cost); 12 days of personal leave without change to stipend; 5 days of release for dissertation defense, licensing exam, and/or job interviews; and use of university libraries (including access to scientific journals) and facilities as a staff member. Holidays can be found at https://campus.und.edu/human-resources/employees/benefits/leave.html. Students from accredited clinical or counseling psychology programs are eligible. A background check is required post-match.

Application Procedures

The UCC participates in the APPIC Internship Matching Program (#2001). Applicants for the internship program should provide the UCC with the following materials by **November 15**:

- a. A completed application form APPIC Application for Psychology Internship (AAPI) form which may be accessed at https://www.appic.org/Internships/Internship-Application-AAPI-Portals/AAPI-For-Applicants
- b. Curriculum Vita
- c. Cover Letter
- d. Transcripts of all graduate work
- e. At least three (3) Letters of Recommendation (APPIC Standardized Reference Form)

Interview Process

Applicants for interviews are notified by phone or e-mail, typically in mid-December. Those not offered an interview are informed by e-mail. All interviews will be conducted virtually (via Zoom) and typically take place in the beginning of January.

The University Counseling Center is seeking membership with the American Association of Psychology Postdoctoral and Internship Centers (APPIC). This internship site agrees to abide by the APPIC policy that no person at this training facility will solicit, accept, or use any rank-related information from any intern applicant.

Intern Evaluation and Review

Providing interns with on-going formative feedback and evaluation is key to facilitating an intern's personal and professional growth. Interns receive on-going informal evaluation and feedback throughout the year as well as formal written evaluations based on the profession-wide competencies at the mid-year and year-end points of the training year (i.e., February and July).

Initial Evaluation

In August, intern's skill levels and experience to date are informally assessed by the Doctoral Psychology Internship Program Director and senior staff. This initial assessment is to provide a view of the intern's strengths as well as areas for further development. Interns after familiarization with program aims, goals, and competencies of focus for their training year, will be asked to engage in self-assessment. This is done through discussion and completing a written evaluation based on their estimation of their current knowledge and skill. This discussion will support identifying initial training goals.

Formal Evaluation

Interns are formally evaluated by their individual supervisors. Interns and supervisors are asked to complete evaluation forms, engage in a substantive discussion of the evaluations, and identify new or revised training goals that arise from the evaluations. These evaluations are completed at mid-year and year-end points of the internship. At each point that interns are formally evaluated, interns also provide evaluation and feedback of supervisors, the Assistant Director of Training, the Doctoral Psychology Internship Program Director, and the internship program.

The competency-based formal written evaluations at the mid-year and year-end points will be shared with the doctoral psychology intern's graduate program training director, which also includes feedback concerning the intern's progress in the internship program, within 10 business days of completed review and discussion of the evaluation between the doctoral psychology intern and the supervisor.

Educational Mission for Trainees of All Levels

The UCC espouses a philosophy of training responsive to its multi-cultural setting within a university community. The UCC is committed to providing quality experiential training that facilitates growth and competence, as well as integrates the application of current scientific knowledge, principles, and theories in the provision of mental health services. Trainees learn to apply their skills within an ethical and multi-cultural service delivery environment. Trainees are expected to integrate science and professional practice sufficiently to demonstrate skill and ability in conceptualizing issues for assessment and intervention with diverse individuals and groups. The goal of training at the UCC is to prepare broadly trained professionals to offer services that are preventive, developmental, and remedial and that reflect the highest standards of the profession.

There are several levels of graduate training that students can become involved in. They are:

- First Practicum (Master's Counseling Traineeship and Direct Admit Counseling Psychology Practicum)
- Master's-level Counseling Internship
- Doctoral Psychology Practicum
- Advanced Doctoral Psychology Practicum
- Health Service Psychology Doctoral Internship

The educational mission of the UCC views development, refinement, and integration of clinical skills in a variety of areas as one central task of education and training. Trainees start with a foundation of didactic information and clinical skills from their academic program. Training at UCC provides an intensive opportunity to develop new skills and to apply familiar skills in increasingly sophisticated ways.

A second, closely related task is the development of a more mature, integrated professional identity. For many trainees their immersion in the UCC's educational offerings represents an important transition from the role of graduate student to that of a professional counselor or health service psychologist, prepared for entry-level practice or doctoral traineeship. The UCC supports trainees' growth via mentoring, discussion, didactics, and direct experience. Trainees gain specific exposure to the many roles and responsibilities of a counselor or psychologist in a counseling center setting, which provides a strong foundation for future work in a university setting. This exposure occurs as trainees serve with staff on internal administrative committees and participate in ongoing discussions about mental health service roles within the larger university community during staff meetings, seminars, and staff retreats. Thus, the UCC also expects trainees to demonstrate competency in professional conduct.

The UCC staff has identified 2 major training goals:

- First, the UCC promotes development, refinement, and integration of trainees' clinical competencies in multiple areas of professional practice.
- Second, the program focuses on trainees developing a more mature, integrated professional identity. All aspects of the training program integrate counseling and supervision research and theory with clinical practice in support of these training goals.

Administration of Area

UCC Director, Assistant Director of Training, Doctoral Psychology Internship Program Director, and Supervisors

1. Sets policy, administers area, and supervises the evaluation process.

- 2. Establishes training committee, if applicable, for the purpose of overseeing the quality and nature of the training program, and to assist in the intern search and selection process.
- 3. Obtains advisory input from the training committee and training staff as needed.
- 4. Directs an ongoing evaluation of the training area.
- 5. Reviews all area forms and assures their availability to the staff.
- 6. Reviews and determines procedures for the area and oversees their implementation.
- 7. Makes all supervisory assignments within the area and designates available training staff in a variety of training roles.
- 8. Directs the supervisor evaluation and feedback process.
- 9. Coordinates the conduct, planning, and evaluation of the training program.
- 10. Oversees trainee selection and maintains a liaison relationship with appropriate faculty from the trainee's academic program.
- 11. Sets the absence expectation for trainees, and excessive absenteeism is discussed with supervisee, supervisor, and director.

General Training Policies

Policy UCC 500

- 1. The training staff consists of all staff who regularly provide supervision in the UCC. Training staff meetings are held at set intervals throughout each semester in order to a) discuss the training program in general and highlight outcomes, b) discuss supervision, and c) review progress of trainees.
- 2. The training staff supports the supervisory relationship.
- 3. Supervision is provided within the ethical guidelines that govern the supervisor and protect the welfare of the client and the supervisee.
- 4. All trainees will inform their clients about their training status. Clients will also be provided the Supervisory Disclosure Form upon initiation of counseling services with a trainee. This form is available to clients upon request.
- 5. All trainees will explain each proper consent and disclosure form to clients when appropriate.
- 6. Trainees are responsible for protecting the confidentiality of clients, including when they consult within classes.
- 7. All trainees will follow the ethical code that governs their supervisor's professional work and licensure. Any violation of these codes or standards could result in immediate suspension.

- 8. Due Process procedures could result in the trainee's dismissal from the UCC, subject to appeal. Please see detailed discussion of Due Process and Grievance Procedures below. Each trainee is expected to review these processes and ask questions for clarification if needed.
- 9. Evaluation is an on-going and reciprocal process conducted both formally and informally throughout the training program.

Due Process and Grievance Policies and Procedures

Statement of Rights and Responsibilities

The following list provides a comprehensive, though not exhaustive, overview of these concepts as they relate to the training program and philosophy of the UCC.

Trainee Rights:

- **1.** The right to a clear statement of general rights and responsibilities at the outset of training.
- 2. The right to be trained by professionals who adhere to APA/ACA ethical and professional guidelines.
- **3.** The right to be treated with professional respect and recognition of the professional background each trainee brings to the training placement process.
- The right to ongoing evaluation that is specific, respectful and relevant.
- **5.** The right to offer ongoing feedback about and evaluation of the training program and of supervisor(s).
- **6.** The right to initiate an informal resolution of problems that might arise during training (i.e. regarding supervision, case assignment, professional consideration) through a request to the individual concerned and/or supervisor.
- **7.** The right to due process and/or appeal to address problems if informal resolution has failed (either with a supervisor or staff).
- **8.** The right to respect for personal privacy.

Trainee Responsibilities:

1. The responsibility to read, understand, and, if necessary, seek clarification of this statement of rights and responsibilities. It is assumed that these responsibilities will be exercised as a function of competence.

- **2.** The responsibility to maintain behavior within the scope of the APA/ACA ethical and professional guidelines.
- **3.** The responsibility to behave in accordance with the laws and regulations of the State of North Dakota.
- **4.** The responsibility to be open to professionally appropriate feedback from supervisors, professional staff, and center personnel.
- **5.** The responsibility to behave in a manner that promotes professional interactions and aligns with the standards and expectations of the University Counseling Center.
- **6.** The responsibility to give professionally appropriate feedback regarding the training and supervisory experience.
- **7.** The responsibility to participate actively in the training, service, and overall activities of the UCC.
- **8.** The responsibility to behave in a professionally appropriate manner if Due Process is initiated.
- **9.** The responsibility to actively pursue growth related to the training objectives outlined below.

Due Process for Problematic Trainee Behavior

The Director, Assistant Director, Doctoral Psychology Internship Program Director, and supervisors oversee any disciplinary actions associated with training. All potential trainee disciplinary inquiries and actions invoke Due Process to ensure problems are addressed systematically and that decisions about training are not arbitrary or personally based. To ensure a fair and equitable process, the program must provide:

- **1.** Clear Expectations: Adequate exposure to expectations related to professional functioning, both in writing and through discussion as needed.
- 2. Evaluation and Feedback: Adequate exposure to processes related to the evaluation of training and performance, including routine evaluation and feedback as part of supervision.
- **3.** Behavior Clarification: Clear distinction to trainees between "behaviors of concern" and "problematic behaviors."

Identifying Problematic Trainee Behavior

When there is a concern about the behavior or performance of a trainee, the UCC Director, the Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director are responsible for determining whether a behavior is of concern or problematic.

Common Behaviors or Attitudes of Concern:

Exhibiting and addressing these behaviors is a common element of training. These behaviors might include, but are not limited to:

- Timeliness of paperwork
- Punctuality and attendance
- Appearance, etiquette, behaviors, and demeanor appropriate to the standards of the profession
- Skills deficits that can be effectively rectified by training or supervision

Problematic Behavior:

Problematic behavior is defined as interference in professional functioning in one or more of the following areas. The trainee is unwilling and/or unable to:

- Meet Professional Standards of Behavior: Failing to meet the professional standards for behavior and failure to manage behaviors that directly affect professional conduct.
- Demonstrate Competency: Failing to demonstrate professional skills at a
 developmentally appropriate level of competency. Formal evaluations indicating
 a lack of developmentally appropriate levels of competency will initiate Due
 Process. For Doctoral Psychology Interns this includes score a 3 or below on the
 mid-point competency evaluations of the Doctoral Psychology Internship. For
 other trainees, it includes scoring lower than indicated for their appropriate level
 based on evaluations provided by their academic program.
- Negligence or Incompetence: Exhibiting negligence, incompetence, and/or violations of ethical principles or legal statutes may be serious enough to bypass remediation and warrant dismissal from training. Examples include, but are not limited to:
 - The trainee does not acknowledge, understand, or address a concern when identified by supervisors.
 - The trainee does not adequately change or remedy a concern as a result or feedback, direction, or evaluation in a specified period.

- The trainee is unable to demonstrate professional skills and reach a level of competency consistent with their level of training in the expected period.
- The trainee is unable or unwilling to learn and follow the ethical principles of their profession.
- The trainee is unable or unwilling to learn and follow applicable local and federal legal statutes.
- Problematic behavior has the potential for ethical and/or legal ramifications if not addressed.
- Problematic behavior is pervasive, impacting more than one area of professional functioning.
- Problematic behavior negatively impacts the training cohort.
- The trainee's behavior negatively impacts the public view of the center.
- The quality of services delivered by the trainee is detrimental to the welfare of clients.
- A disproportionate amount of attention and supervision is required of supervisors and training staff to monitor the trainee and welfare of their clients.
- The trainee is unable to demonstrate the ability to control stress and/or emotional reactions, which harms professional functioning. Examples of harm include, but are not limited to:
 - The inability to maintain a recovery program in the instance of substance abuse
 - The inability to keep symptoms of mental health challenges or disorders from interfering with the ability to provide effective therapy
 - When personal issues or stresses result in inappropriate counseling or therapeutic responses.

Managing Problematic Trainee Behavior

The UCC is committed to addressing concerns about trainee behavior in a timely, fair, and systematic manner. This may involve notifying and/or involving the trainee's

academic department. It should be noted that should the Assistant Director of Training and/or the Doctoral Psychology Internship Program Director be serving as the primary supervisor and this creates a conflict impeding Due Process, the UCC Director may serve to fulfill duties as needed in any of the below procedures. The following steps outline the procedure for managing problematic trainee behavior and ensuring Due Process:

- Knowledge of problematic behavior or strong suspicion of problematic behavior should be reported to a member of the training committee, which includes the UCC Director, Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director and supervisors.
- 2. The UCC Director, Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director and supervisors will determine if a formal review of the reported problematic behavior is in order, or if an informal resolution via verbal warning and oversight by the primary supervisor is appropriate at the time.

Informal Resolution

A verbal warning that is an observation of problematic behavior(s) communicated to the trainee by the supervisor, and/or the Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director. If the behavior continues, additional reviews and consequences may be initiated.

Formal Review Process

- 1. If it is determined a formal review is appropriate, the Assistant Director of Training and/or the Doctoral Psychology Internship Program Director informs and provides written notification (within 10 days of the determination to hold a formal review) to the trainee and the trainee's academic program of the formal review, concern presented to the committee, the impending occurrence of a committee meeting for formal review of problematic behaviors, the identified members of the review committee, and specific directives the committee expects the trainee to follow until the review takes place.
- 2. The trainee is able to provide a written response to the review committee within 5 days of notification of the formal review.
- 3. The review committee will meet to conduct a review of the identified problematic behavior(s). The meeting will take place within 10 days of notification to the trainee of the review.
- The review committee will evaluate the concern and determine what action is necessary to protect client welfare and prevent the recurrence of the identified problematic behavior(s).

- 5. <u>Outcome of Formal Review:</u> The Assistant Director of Training and/or the Doctoral Psychology Internship Program Director will inform the trainee and the trainee's academic program of the outcome of the review within 5 working days and will include one of the following:
 - Acknowledgment and No Further Action
 - Informal Action Plan
 - Formal Remediation Plan
 - Suspension
 - Dismissal
- All formal review, outcomes, and progress is documented in the trainee's professional file and provided to the trainee's academic program along prescribed timelines.

Formal Review Outcomes and Process

- Acknowledgment and No Further Action: If the review committee decides by a simple majority that the problem is not significant enough to warrant further action, the issue is acknowledged, and no further action is taken. The supervisor will work with the trainee to ensure the problem is rectified.
- 2. Informal Action Plan: An informal action plan is implemented when the problem is more significant but presents a low risk to stakeholders and is amenable to timely change. The plan may include, but is not limited to, increased supervision, didactic training, and/or structured readings. One or more progress reviews will be conducted as part of the trainee's action plan within a specified time frame, with initial review occurring no more than 30 days following notification of formal review outcome.
- 3. Formal Remediation Plan: A formal remediation plan is developed if the problem(s) requires a more structured approach. When a simple majority of the review committee (the UCC Director will serve as a tie breaker if needed to determine majority) votes to implement a formal remediation plan, the plan will be developed by the review committee.

A formal remediation plan includes:

- 1. Specific behaviors or skills associated with the problem(s)
- 2. Specific actions to be taken to rectify the problem(s)
- 3. Time frame for resolution

4. Procedures for determining if the problem(s) has been remediated

Process for Implementing Formal Remediation Plans:

- Notification: The supervisor or a designated review committee member verbally informs the trainee that formal remediation procedures will be implemented and shares the formal remediation document within 5 working days of the review decision.
- 2. Discussion: The Assistant Director of Training or Doctoral Psychology Internship Program Director discusses the formal remediation plan with all parties involved, including the primary supervisor and the Director of Clinical Training (DCT) of the home academic institution within 5 working days of sharing the document with the trainee.
- 3. Documentation: The formal remediation plan is placed in the trainee's file and communicated to the Director of Clinical Training (DCT) of the home academic institution within 5 working days of sharing the document with the trainee.
- 4. Conditions and Review: The formal remediation plan states specific behavioral conditions for continuation, suspension from activities if necessary, criteria for resolution, and deadlines. Progress reviews are conducted within specified timeframes to assess the improvement with initial review occurring no more than 30 days following notification of formal review outcome.

Formal Remediation Plan Progress Reviews and Outcomes

The Assistant Director of Training, Doctoral Psychology Internship Program Director, and the trainee's supervisor conduct a formal evaluation of progress. Decisions may include:

- 1. Resolving the formal remediation plan upon successful completion
- 2. Reducing the formal remediation plan to an informal action plan
- 3. Extending the formal remediation plan with additional progress reviews
- Terminating the trainee's involvement in the internship and notifying the trainee's graduate program and APPIC as appropriate. The trainee will complete the normal procedures for program termination, including all client documentation.
- 5. If the decision involves continuation in the internship, the Assistant Director of Training or Doctoral Psychology Internship Program Director

may assign a new clinical supervisor and meet with them to plan the monitoring of the conditions of the decision. If the Doctoral Psychology Internship Program Director is the primary individual supervisor of the trainee, the UCC Director will take up the role(s) of the Doctoral Psychology Internship Program Director listed above.

Documentation and Communication:

The evaluation of progress decision is documented in writing and shared with the trainee within 10 working days of any progress review. This documentation becomes part of the trainee's professional file and is shared with the home academic institution within 10 days of the review. Any time limits listed above may be extended by mutual consent (review committee, trainee, and trainee's academic program) within a reasonable time frame.

- 4. **Suspension:** The trainee may be suspended from clinical services if suspected of and/or charged with committing an ethical violation.
 - Suspension is effective immediately and communicated in writing within 1 working day. A special formal suspension review meeting with identified members of the training committee, including at least one member of the training leadership, is scheduled within 3 working days to review the problematic behavior(s) prompting suspension and to develop a remediation plan. One or more formal progress review meetings will be scheduled to assess progress.
 - Initial Suspension Meeting: The primary supervisor and at least one member of the training leadership (the UCC Director, the Assistant Director of Training, and/or the Doctoral Psychology Internship Program Director) will meet with the trainee to inform the trainee of suspension status (within 1 working day of the decision to suspend clinical services), to schedule the formal suspension review (within 3 working days of notifying the trainee of suspension), identify formal review committee members, and specify expectations of suspension until the formal review meeting occurs. The academic program will be informed of all of the above within 1 working day of the decision to suspend clinical services.
 - The trainee may provide a written response to the review committee within 3 days of notification of the formal review of problematic behavior(s) prompting suspension.
 - The review committee will meet to conduct a review of the identified problematic behavior(s) prompting suspension. The meeting will take place within 3 days of notification to the trainee of the suspension.

- The review committee will evaluate the concern and determine what action is necessary to protect client welfare and prevent the recurrence of the identified problematic behavior(s) prompting suspension.
- The Assistant Director of Training and/or the Doctoral Psychology Internship Program Director inform the trainee and the trainee's academic program of the rationale for the review committee's decision and the actions taken or remediation plan for suspension. The trainee and the trainee's program will receive a copy of the letter stating the review committee's decision, and another copy will be placed in the trainee's professional file at the UCC. Notifications to the academic program and to the trainee will be completed within 5 working days of the formal review decision.
- Progress Review Timeline: The status of the suspension will be reviewed within the time limits identified in the formal remediation plan. The initial progress review will occur within 30 days.
- Progress Review Meeting: During the special review meeting, the training leadership, with the trainee's supervisor, will assess the progress made toward addressing the problematic behavior(s) and review the conditions of the suspension.
 - If the issue is resolved, no further action will be taken, and the suspension status will be removed. This resolution will be communicated to all involved parties.
 - If the training leadership and supervisor determine that there has not been sufficient improvement in the trainee's behavior, it will communicate in writing that the conditions for revoking the suspension have not been met. At that point, the committee may:
 - Issue a continuance of the suspension for a specified period with subsequent re-evaluation
 - Determine procedures for evaluating if the problem(s) has been appropriate remediated
 - Invoke a dismissal from the internship
- Consultation with UND Human Resources: Human Resources may be consulted to ensure actions are in accordance with university policy and procedures and conform to North Dakota University System regulations.
- 5. **Dismissal:** Dismissal involves the permanent withdrawal of all UCC responsibilities and privileges due to severe ethical violations, when imminent physical or psychological harm to the client is a major factor, or when the trainee would be unable to complete the internship due to the significant problematic

behavior(s) under review. The academic department will be informed (within 1 working day) of the dismissal and that the trainee has not successfully completed the internship, and the trainee will complete procedures for ending the internship.

Procedures for Trainee Filing an Appeal

A trainee has the opportunity to appeal actions taken by the internship program regarding identified problematic behavior(s). The following procedures outline the process for a trainee to respond to remediation-oriented actions, including the timeline for responses:

- 1. Appeal Request Submission: Within ten (10) days of the communication of the outcome for a formal review, the trainee submits a letter requesting an appeal to the Assistant Director of Training, the Doctoral Psychology Internship Program Director, their primary supervisor, or the UCC Director.
- 2. Formation of Appeals Committee: Within five (5) working days of receiving the appeal request, the UCC Director, Assistant Director of Training, and/or the Doctoral Internship Program Director will convene an Appeals Committee of two UCC staff members and two professionals from the trainee's academic department, selected by the trainee, who were not involved in the initial process. This may include the trainee's primary supervisor.
- **3.** Notification of Special Review Meeting: The trainee and their supervisor or the staff members involved, and members from the trainee's academic department, will be notified that a special review meeting will be held.
- **4.** Request for Written Statements: The Appeals Committee may request written statements from individuals as deemed appropriate.
- 5. Submission of Written Statements and Interviews: The trainee may submit any written statements they believe to be appropriate, request a personal interview, and/or request that the Committee interview other individuals who might have relevant information. Any supervisor or staff member involved will also have the same opportunity.
- 6. Fact-Finding Review: The Appeals Committee conducts the fact-finding review.
- **7.** Communication of Findings: Within two (2) working days of concluding their deliberation, the Appeals Committee or designated member will communicate the summary of their findings and any recommendations to the UCC Director.
- **8.** UCC Director's Action: Following the review by the Appeals Committee, the UCC Director will take appropriate action, which may include but is not limited to:
 - Accepting the outcome of initial review
 - Requesting an addendum be added to include specific changes in the statement of problems or recommendations of the initial review outcome

- Requesting that the Appeals Committee adds an addendum to the initial review outcome
- Placing the trainee on suspension for a specific time, during which changes in the trainee's professional functioning according to the identified remediation program are to be implemented
- Recommending dismissal of the trainee from internship
- **9.** Ultimately, the UCC Director will make the final decision based on the facts, client care impacts, and ethical considerations.
- 10. Notification of the UCC Director's Action to both the trainee and the trainee's academic program will take place within 5 business days of receipt of the Appeals Committee findings and recommendations.
- **11.** Further Pursuit of Appeal: If the trainee is dissatisfied with the decision, they will be informed of their rights to further pursue the matter with the Office of Community Standards at UND.

Procedures for Trainee Filing a Grievance

The staff of the UCC agrees to interact with trainees in a manner that is consistent with ethical guidelines and free of discrimination or harassment of any form.

Any trainee who experiences unethical behavior, discrimination, or harassment perpetrated by any member of the UCC can initiate a grievance. The trainee has the right to seek legal advice or counsel at any time. Costs are not covered by the UCC and the UCC will work with appropriate UND resources should a grievance be filed that involves a UND employee.

The process for a trainee to file a grievance includes:

- 1. The trainee documents the grievance in writing, specifying:
 - Who was involved
 - What was said
 - What was done
 - When it occurred
 - Where it occurred
- 2. The trainee Notifies the Assistant Director of Training, Doctoral Psychology Internship Program Director, and/or UCC Director of the grievance.
 - If the Doctoral Psychology Internship Program Director is included in the grievance, notify the Assistant Director of Training or the UCC Director as appropriate to the concerns of the grievance.
- 3. Grievances may be additionally filed:

- According to procedures outlined in the Code of Student Life (for UND student trainees)
- By contacting the Dean of Students
- By contacting UND Human Resources

Conflict Resolution in Training

Trainees may experience dissatisfaction while training at the UCC. It is expected the trainees will be encouraged to pursue resolution of these conflicts or dissatisfactions positively and constructively. A trainee may wish to discuss the circumstances with their advisor or another faculty member, but it is the responsibility of the trainee to work towards successful conflict resolution using the protocol outlined below:

- 1. The trainee is encouraged to first discuss the concern with the person involved.
- 2. If a satisfactory resolution is not found, the trainee is encouraged to bring the concern to either the primary supervisor, Assistant Director of Training, or Doctoral Psychology Internship Program Director
 - In the event the conflict includes the Doctoral Psychology Internship Program Director then the trainee is encouraged to bring the conflict to the Assistant Director of Training, and vice versa.
- 3. If a resolution is not found, the trainee would then be asked to submit documentation to the Assistant Director of Training or the UCC Director.
- 4. After review, a response will be given to the trainee in writing about next steps and possibly a conflict management specialist may be asked to assist the UCC further.

Training Recording Policies and Forms

In order to ethically protect client welfare, quality assurance of service provision, and high quality supervision and training, the following recording policy will apply to trainees functioning in the Clinical Services area of the UND UCC.

Recording of Clients in Individual Therapy

1. Informed consent is obtained for electronically recording sessions. (See below for the forms for consent for recording and supervisor disclosure.) Clients are to be informed about the training environment (e.g., supervision, case conference, practicum seminar) and the roles of participants (e.g., supervisor, psychology trainees, faculty member) in which recordings are to be reviewed. Recordings, including supervision and individual and group therapy recordings, are not to be removed from the identified secure system.

2. Master's-Level Trainees

 Beginning trainees, should at a minimum, video record all sessions with all assigned clients.

3. Doctoral Practicum Trainees

- Policy I (a) (b) above applies to advanced practicum trainees if enrolled in their first semester of UND practicum.
- Practicum trainees who have previously completed a practicum will still video record all on-going therapy sessions with assigned clients. Exceptions to this policy may be recommended at the discretion of the primary clinical supervisor and the Assistant Directo of Training or the Doctoral Psychology Internship Program Director.

4. Doctoral Psychology Interns

- It is expected that interns will video record at least 50% of their therapy sessions with their assigned clients.
- It is expected that interns will video record all of their supervision provision meetings with their trainees.
- Recordings will be reviewed by interns and interns' primary clinical supervisors and interns' supervision of supervision supervisors.
- If an assigned client revokes or denies permission for recording, it is expected
 that the intern discusses this with their primary supervisor, who will then
 determine if that client needs to be re-assigned based on the client's
 presenting concerns and the skill level of the intern.

5. Onsite Recording

 UCC training videos must only be recorded in the identified secure video system. All onsite recordings should only be conducted using the identified system.

6. Distance Recording

 Recording of remote sessions may be completed directly to the hard drive of the trainee's computer and immediately uploaded to the identified secure recording system.



Supervisory Disclosure Form, Consent for Services Recording & Educational Use

UCC Education & Training Program

Supervisory Disclosure: The staff of the University Counseling Center (UCC) includes licensed providers and counseling or psychology trainees.

Supervisors have full responsibility for the work of those being supervised. In order to ensure the highest standard of care, supervisors meet with their counseling or psychology trainees weekly to review client care. The limits of confidentiality delineated in the Informed Consent Statement apply to supervision. The supervisor(s) working with your provider are available for consultation upon your request. If there is a potential conflict of interest with a supervisor, please discuss it with your counseling or psychology trainee, who can work to assess the situation and make adjustments as needed. If you have any questions about this supervisory relationship, we encourage you to talk to your trainee. This form will become part of your clinical record and a copy will be given to you upon request. Signing this form acknowledges your informed consent for treatment by a counseling or psychology trainee under clinical supervision.

My trainee is currently supervised by:

I fully understand the statement above, have had the opportunity to ask questions and have these questions answered, and voluntarily agree to engage in therapy with the trainee who is being supervised.

Signature to confirm: _	
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Recording for Supervision & Treatment Purposes

The University Counseling Center is a training site for students who are enrolled in graduate level psychology and counseling programs. They are completing their training experience with us.

Each counseling or psychology trainee has successfully completed coursework and laboratories in therapy skills and techniques. They are able to provide therapy for individuals, couples, and groups while being supervised. Supervision is provided for each counseling or psychology trainee by one of our licensed psychologists and/or a licensed provider.

Whenever clients agree to receive therapy from a supervised counseling or psychology trainee at our Center, it is our policy to digitally record the counseling sessions for supervisory and treatment purposes. The recordings be handled according to professional and ethical standards to ensure confidentiality and privacy. These will be deleted/destroyed upon completion of trainee supervision and at regular intervals.

You are being offered the opportunity to receive services from a supervised counseling or psychology trainee which will mean that your sessions will be recorded. If you decline, it will not affect your eligibility for services. You will be assigned to receive counseling from one of our licensed providers and it will not be necessary to record your sessions.

Please check the box below. Yes, I agree to receive services from a supervised counseling or psychology trainee and consent to have the counseling sessions digitally recorded for treatment purposes only.	y
Signature:	

Consent for Educational Use

I have granted consent to receive counseling from a trainee which means that my counseling sessions have been recorded. I now give permission for my audio and video recorded counseling sessions (e.g. emergencies, intake, and on-going counseling sessions) and to be used only for educational discussion and training in a small group supervision. I understand the small group supervision may include discussion of the content of my session and may involve an academic professor or other students who are in training at other counseling sites. The recordings will not leave the Secure Intelligent Video Software (IVS) System and they will be handled according to professional and ethical standards to ensure confidentiality and privacy. Once the videos have been used for supervision, they will be erased.

I also understand that any individuals involved in the small group supervision are bound by the same standards of confidentiality, laws, and professional ethics as my counselor. Where possible, personally identifying information will be removed or changed to conceal my identity.

I have been advised that I have the right to not have my session recorded or used for an educational and training purpose and that this action will not affect my ability to receive treatment. I can revoke my permission at any time.

Please	e check the box below.
	Yes, I consent to have my counseling session recordings (audio or video) used for small group supervision/educational purposes.
	I do not, at this time, consent to have my counseling session recordings (audio or video) used for small group supervision/educational purposes.
Signat	ure:
Date.	

Video Review for Academic Portion

Trainees who need to show video recordings as part of their academic coursework can share recordings, provided they have addressed the following requirements:

1. Obtain Proper Consent:

Ensure that the appropriate consent is in place (see attached: Supervisory Disclosure, Recording and Education Use Informed Consent), signed by the client whose session is being recorded for academic purposes. This consent must be documented and filed in the client's record before proceeding with any other steps.

2. Confidentiality Assurance:

Ensure that all individuals in the small group supervision are bound by the same standards of confidentiality and professional ethics as counselors and psychologists. Ensure that you are in a private location if remote.

3. Use of UND-Issued Computer

Use only a UND-issued computer for accessing and viewing videos.

4. Secure Video Viewing:

View approved videos only in the secure video software system through oncampus access. If remote only share your screen and videos with others after you have entered the recording for the course to avoid sharing information related to other videos or clients stored in the same system. Stop sharing your screen and video prior to exiting the client's recording for the same reason.

Multiple Relationships as Staff with Trainees

Recognizing the importance of relationships between staff and trainees, the complexity of issues related to multiple relationships, and the need for the highest level of ethical conduct by clinicians, the following overarching principles and guidelines should inform the conduct of clinical staff members.

- The Counseling Center utilizes a team model of supervising trainees, meaning all clinicians are directly or indirectly supervisors of all trainees. There are no neutral relationships).
- 2. Given the inherent power differential in all staff-trainee interactions, staff should not seek social contact with trainees to fulfill their own social needs.
- 3. Staff should consider the impact of socializing with trainees outside of working and should limit such interactions to business-related matters.

- 4. Clinicians who choose to socialize during working hours (e.g., lunch, coffee breaks) should make efforts to include trainees as a group or provide equitable invitations across trainees in each cohort.
- 5. Clinicians are encouraged to seek consultation when questions arise about this issue. Willingness to share social interactions with trainees with colleagues can serve as an indicator of appropriateness.
- 6. Completion of the attached "Notice of Consent to Multiple Relationships" should be reviewed and completed in such situations where multiple relationships with a UCC staff member occur for a trainee.



Notice and Consent to Multiple Relationships

Trainees working with the University of North Dakota University Counseling Center are expected to be cognizant of and abide by the guidelines as stated in the APA Ethical Principles of Psychologists and Code of Conduct, as are all staff of the University Counseling Center (UCC). Multiple (Dual) Relationships are those in which two persons share social, personal, or other non-professional contact and one person plays a therapeutic or evaluative role in some setting with the other person. Multiple Relationships that would not reasonably be expected to cause impairment or risk exploitation or harm are not unethical. See Ethical Principles of Psychologists and Code of Conduct, Standard 3.05 (Multiple Relationships). Because the UCC provides services to UND students, Multiple Relationships may develop between a UCC staff person and a UND student (client) who later applies to participate in training at the UCC.

You are being asked to sign this document, because it was determined that a Multiple (Dual) Relationship exists between you and a UCC staff member or current trainee. Do not sign this document if you believe that your relationship with any UCC licensed psychologist, counselor, or staff member could reasonably be expected to risk exploitation or harm to you. If a potentially harmful relationship develops at some point after you sign this document, you and any UCC personnel involved will take reasonable steps to resolve the relationship in the best interest of you and the UCC. All staff, particularly licensed staff, remain cognizant and comply with Ethical Principles of Psychologists and Code of Conduct, Standards 3.04 (Avoiding Harm), 3.05 (Multiple Relationships), 3.06 (Conflict of Interest), and 3.08 (Exploitative Relationships).

By placing your signature on this document, you acknowledge that you were informed of a Multiple Relationship between you and a UCC licensed psychologist, counselor, staff member, or trainee and having been fully informed of the potential for negative or adverse consequences arising from the Multiple Relationship and limitations imposed on staff of UCC regarding supervisory and evaluative procedures, in your case, you consent to the Multiple Relationship. By placing your signature on this document, you **do not** waive your rights to a professional learning environment that is consistent with ethical guidelines and free of discrimination or harassment in any form nor do you waive any of the rights granted to you by UND or UCC policies.

Intern		Date