

CCPPP Guiding Principles in Response to COVID-19

April 2, 2020

This document articulates the principles that the CCPPP advocates Canadian psychology training programs use in determining their responses to the training disruptions presented by the COVID-19 crisis. The principles are for both university and internship programs: They are designed to support students currently completing their internship year as well as those completing practicum placements in preparation for internship training.

In our current crisis, with its many uncontrollable elements, it is essential that our training community and especially our students, feel heard and supported. We must collectively practice patience, acceptance, and tolerating uncertainty. We can model for our students how to navigate these challenging issues and be clear about the factors that weigh into our decision making.

The CCPPP is in regular communication with the Canadian Psychological Association (CPA, which oversees the accreditation of training programs) and the Association of Canadian Psychology Regulatory Organizations (ACPRO, the Council that represents the provincial and territorial regulatory organizations) about this evolving situation. The CCPPP will keep its members apprised of understandings or agreements that emerge from these conversations.

The problem:

The COVID-19 pandemic has immediately and significantly impacted students' ability to accrue the recommended face-to-face clinical hours needed in order to complete their internship or apply for internship in the coming year.

Principles to guide our problem-solving:

1. Students' needs must be at the centre of programs' decision-making.

Programs have a great deal to balance in this situation, including the following: patients' needs; the health and safety of patients, students, other healthcare providers, and our immediate and global communities; demands on the health care system; student training needs; and our long-term responsibility to ensure we are graduating competent psychologists. That said, the CCPPP encourages programs to take a student-centred approach, keeping the interests of trainees at the forefront of their decision-making.

Ideally our training community would be consistent in how we address these challenges so as to ensure that students are treated equitably. This will not be entirely possible given the range of activities, settings, and populations our students work with, institutional demands and legal

requirements, and the rapidly evolving nature of this crisis, which will have a differential effect on different areas of the country. Nonetheless, as a training community we can be consistent in placing student needs at the centre of our decision-making. This means recognizing and working to minimize the power differential between program leaders (including supervisors, administrators, and senior leadership) and trainees as it relates to decision-making. The CCPPP agrees with the position of the Association of Psychology Postdoctoral and Internship Centers (APPIC, the organization that oversees the internship match process across the United States and Canada) that programs should consider the unique professional risks experienced by trainees (such as differences in benefits and sick time) when making decisions about training. ¹

Successful completion of a CPA-accredited pre-doctoral internship is typically students' final step before the conferment of their doctorate. It is essential that program leaders consider the long-term negative impact of disruptions to internship training in terms of students' future as well as their own efforts to hire psychologists. That is, program leaders should consider the fact that should students not complete their internship on schedule, they will not graduate and enter the workforce as planned, which typically occurs immediately following their internship year.

2. Open and transparent communication is essential, with students and among training programs.

Open communication and transparency are essential in times of crisis and uncertainty. The CCPPP pledges to be as clear and open with members as possible and we encourage each program to be transparent with students and supervisors. We cannot solve problems that we are not aware of; as such, we encourage supervisors and students to promptly raise concerns as well as possible solutions. The CCPPP will continue to survey students to understand the issues that are concerning them, and will share this information among all our members.

As our training community identifies the obstacles to addressing the challenges raised by the disruptions posed by COVID-19, and collectively brainstorms solutions, the CCPPP will facilitate the sharing of these ideas and resources. Close communication between university programs and internships will be especially critical as individual student progress is considered. The CCPPP is committed to ensuring that in this crisis we continue to learn from and support each other, our programs more broadly, and first and foremost, our students.

3. Programs should make every effort to minimize the disruption to students' training.

3a. Internships: Programs should make every effort to ensure their interns complete their internship as scheduled (i.e., by August 31, 2020).

It is important that interns complete their training on time. Many interns have jobs scheduled to begin in September 2020, they often have considerable student debt at this point in their training, and with a new internship class scheduled to begin in September, it may be difficult to secure additional funding and supervision resources past the end of the current training year. Further, interns have a reasonable expectation that they would complete their training as scheduled and we have an obligation to honour this expectation.

¹ https://www.appic.org/News-Articles/ArtMID/1931/ArticleID/7/APPIC-Board-of-Directors-COVID-19

That said, we realize this will be more easily achieved for some sites and tracks than others in that some students might be seeking to develop competencies in activities that have been discontinued, or their supervisors might have been redeployed and supervision in these areas is not available. As the Canadian training community considers how to enact this principle, it is our hope that the resulting discussion will help problem-solve how to respond in those situations where meeting this principle will be most challenging.

3b. University programs: Programs should make every effort to ensure internship readiness while minimizing disruption to students' advancement through the program (i.e., students who were on track to apply for internship in Fall 2020 should be supported in doing so).

University programs vary in their practicum requirements and many placements take place in the community, external to the university program. As a result, university programs are limited in their control over decisions made by sites about whether and in what way a practicum opportunity continues at this time. Nevertheless, university programs are the gatekeepers for deciding when students are ready to apply for internship. For some students, the current disruption presents an ideal time to make progress on their research, comprehensives, and other non-clinical activities. For others, research progress may be disrupted (e.g., if in-person data collection is postponed). The more junior a student is in their university program, the more time they have to adapt and "make up" for disruptions in their training experiences prior to applying for and attending internship. In making decisions about students' readiness to apply for internship in the Fall, university programs are encouraged to follow the plan that was in place prior to the disruptions posed by COVID-19 as closely as possible.

4. Programs should be flexible and creative in helping students meet their competencies and complete their training as scheduled.

4a. Internships and internship completion

The CCPPP encourages programs to be flexible and creative in how they ensure interns gain experience in their core competencies and in evaluating whether they meet the requirements of the internship program. It is likely that interns will not have difficulty meeting requirements that do not necessitate direct service (e.g., ethics and professional development; research and program evaluation). Given the current constraints on face-to-face activities, however, it is likely that their direct service will suffer, particularly in the realm of assessment, which is more difficult to conduct through telepsychology than other aspects of psychological practice. Programs are encouraged to consider alternate ways to ensure interns gain direct service experience, including telepsychology (which can take place via telephone when video options are not available), as well as to consider how interns might provide other direct services, such as virtual consultation to other mental health service providers, staff, families, and the general public as they cope with COVID-19.

In evaluating interns, programs are encouraged to focus on whether they have met their core *competencies* rather than whether they have accumulated sufficient hours. Internship programs will already have processes in place for assessing competency. Supervisors and Directors of Training will need to determine what information they need, and whether they have that information, to make a determination regarding whether program requirements have been met. Although competency determinations may be specific to a rotation, they may also be thought of

holistically across the internship experience. In making decisions about successful internship completion, programs are encouraged to consider whether the intern has sufficient experience and skill to pass their internship without having had all the planned for experiences. The CCPPP encourages internship programs and universities to apply the concept of *substantial equivalence*, namely has the nature, breadth, and depth of supervised training experiences been sufficient to meet the expectations of the internship, even if some aspects have been altered? Has the intern achieved sufficient competency, across their training experience, to be considered to have completed their internship?

A flow chart of how these decisions might proceed is presented in Figure 1 (with internships in purple and university programs in blue). Making final decisions about whether a student has successfully met the requirements of internship is the responsibility of the university programs. Of course, these decisions are strongly influenced by the recommendations of the internship programs. Internship programs are encouraged to clearly and consistently document the nature of the training experiences that interns complete and how these compare to original expectations, thus enabling university programs to make informed decisions. University programs are encouraged to be transparent, flexible in their decision-making, and as consistent as possible across students. University programs are encouraged to think about students' experiences and clinical skills holistically, considering both practicum and internship experiences in making their determinations as to whether students have met the requirements of their degrees. For example, some students enter internship with the minimum practicum training hours permitted, whereas others enter with hours well in excess of requirements. In situations in which internship hours fall short, university programs may wish to consider practicum hours accumulated in excess of those required to enter internship as counting toward their requirements for program completion.

In some instances, the requirements for internship may not be met. This situation is expected to be rare in that, as indicated above, programs should make every effort to avoid this scenario. However, it may be that an intern did not have the foundational skills that were expected at the start of internship, did not progress well through the internship to this point, or simply completed too few hours in a foundational area for the training to be considered substantially equivalent. In these instances, internships and university programs should be in close contact with each other, as well as with the student in question, to problem solve options. These options may include the extension of the internship by a few months, if the intern is able to do so and the internship is able to secure funds and resources for supervision. Alternatively, the internship, university program, and student may work together to identify other training opportunities for the student to complete in order for the internship requirement to be considered successfully completed. By necessity, these will be problem-solved on a case-by-case basis. While these instances are expected to be rare, and every effort should be taken to avoid them, university programs and internships must still remain cognizant of their responsibilities as gatekeepers to the profession.

It is important to note that the CCPPP, university programs, and internships are all independent of regulatory bodies. Although our training community may agree to the principles laid out here, the regulation of our profession occurs in the context of provincial/territorial legislation and bylaws that set boundaries on the flexibility that regulators can exercise. Ultimate decisions about registration/licensure/certification falls under the jurisdiction of the regulators and each province/territory has a unique context for making such decisions. To aid regulatory

bodies, programs should be as transparent and consistent as possible in their decision-making, and decisions should be documented clearly. Regulatory bodies may have their own remedies if they perceive deficiencies (e.g., a provisional license with additional requirements in terms of supervised hours) or they may accept evidence that the totality of training completed is substantially equivalent to their provincial/territorial legal framework and bylaws. Regulatory bodies will make their decisions on a case-by-case basis once they have an application for registration/licensure/certification. They may not be able to make global statements that apply to everyone. That said, it is our understanding that as a whole, the regulatory bodies recognize the extraordinary circumstances of our current situation and will balance the disruptions in training with their legal frameworks and regulatory responsibility to protect the public.

4b. University programs and eligibility to apply for internship

Similar principles, in terms of emphasizing competencies over hours, apply to university programs' consideration of internship readiness. Eligibility for internship usually requires, at minimum, completion of all requisite coursework, 600 hours of practicum training (including 300 hours of direct client contact and 150 hours of supervision), and approval of the doctoral dissertation proposal. As is the case with students currently completing their internship, it is likely that students on practicum will have their direct client hours impacted by the current restraints on face-to-face activities.

University programs should consider how pressure to apply to internship may influence students' decisions about face-to-face activities, and find ways to satisfy requirements while also protecting students' (as well as patients' and the broader public's) health and safety. For example, students might feel compelled by practicum supervisors, the administration, or other leaders at the site hosting the practicum, their own graduate supervisors, or their own internal pressures to accumulate hours and experiences, to place themselves in situations that necessitate face-to-face contact. University programs are encouraged to work with their practicum sites to consider alternate ways to ensure practicum students gain direct service experience, including telepsychology (which can take place via telephone when video options are not available).

More advanced students, those closest to applying for internship, likely will be the most affected by the current crisis and disruptions in training. As such, the CCPPP encourages university programs to identify students who are most at risk for experiencing these disruptions (i.e., those in the cohort of students planning to apply for internship in Fall 2020) and prioritize them for any supervised telepsychology training opportunities.

Further, as we approach the Fall 2020 application period, university programs and internships are both encouraged to be flexible with practicum requirements. For example, programs might want to consider relaxing their requirements for specific numbers of direct contact and total practicum hours, focus on competencies over accumulated hours, and consider applications more holistically than they might have otherwise. Programs are also encouraged to give more weight to expected hours, those to be accumulated in the period between applying for and beginning internship, than they have done in previous years.

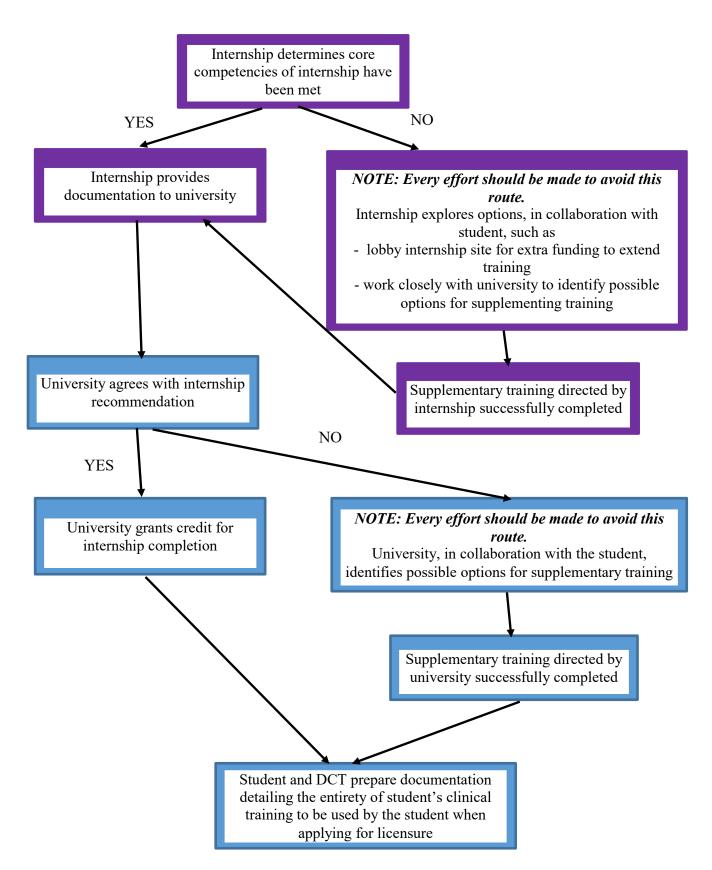


Figure 1. Flowchart of decision-making regarding internship completion