Ethical Principles and Standards That Inform Educational Gatekeeping Practices in Psychology

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Educational gatekeeping functions in psychology serve to assess, remediate, and/or dismiss students and trainees with problematic professional competencies (STPPC). Recently, professional psychology graduate programs have increasingly focused on problems with professional competency, and they have begun to implement formal procedures to intervene with STPPC (Rubin et al., 2007). However, there has been considerably less literature addressing the ethics and ethical considerations of instituting these gatekeeping functions, especially in different stages of education and training in psychology. The American Psychological Association (APA; 2002) *Ethical Principles of Psychologists and Code of Conduct (Ethics Code)* offers faculty and supervisors ethical principles and obligatory standards that provide guidance about how to implement highly ethical gatekeeping practices. The purpose of this article is to highlight the major ethical issues and dilemmas that faculty and supervisors may face when intervening with STPPC and provide recommendations for ethical gatekeeping practices that are inspired by the APA *Ethics Code.*

Keywords: ethics, gatekeeping, competence, competence problems, undergraduate, graduate, internship, postdoctoral

Educational gatekeeping practices in psychology are implemented to benefit students and trainees, and the individuals with whom they interact. Faculty and supervisors have a responsibility to assess, remediate, and/or dismiss students and trainees with problematic professional competencies (STPPC). However, faculty and supervisors may receive little guidance on how to implement such procedures in a highly ethical manner and/or how to approach complex and challenging gatekeeping dilemmas, especially in different stages of education and training in psychology.

Faculty and supervisors in psychology must consider multiple aspects of the American Psychological Association (APA; 2002) *Ethical Principles of Psychologists and Code of Conduct* (hereafter referred to as the *Ethics Code*) during their professional and educational activities, especially during educational gatekeeping functions with STPPC. The ethical principles provide guidance to faculty and supervisors on how to implement ethical gatekeeping functions (General Principles A–E). Although the ethical principles are not enforceable, the ethical standards identified in the *Ethics Code* are obligatory and enforceable. The purpose of this article is to identify the ethical principles that faculty and supervisors should aspire to uphold, the ethical standards...
that must be met, and the issues and ethical dilemmas that may arise when instituting gatekeeping practices for undergraduate, graduate, internship, and postdoctoral STPPC. Finally, recommendations are provided on how to implement ethical educational gatekeeping functions in various stages of education and training in psychology, and suggestions are provided for future directions of this line of work.

GATEKEEPING

Typical gatekeeping functions are put into place to assess acceptable professional competency in students and trainees, and to remediate or dismiss STPPC (Vacha-Haase, Davenport, & Kerewsky, 2004). Remediation may require students and trainees to take further training or coursework; attend therapy; extend practica, internships, or postdoctoral training; and/or even change career focus (Forrest, Elman, Gizara, & Vacha-Haase, 1999). Students and trainees develop professional competency skills at different rates as they progress through their programs, and faculty and supervisors may find it difficult to determine if problematic professional competencies are developmental in nature and can be remediated. At times, student and trainee professional competency problems may be so severe that remediation may not be successful. Graduate programs have increasingly focused on problems with professional competency, and they have begun to implement formal procedures to intervene with STPPC (Rubin et al., 2007).

DEFINITION OF STUDENTS AND TRAINEES WITH PROBLEMS OF PROFESSIONAL COMPETENCE (STPPC)

For the purpose of this article, the term “students” refers to undergraduate and graduate students and the term “trainees” refers to internship and postdoctoral trainees. Students and trainees may display problematic professional competency at any stage of education or training. In their Benchmark document, Fouad and colleagues (2009) identified 15 core competencies, defined their essential components that are necessary for each stage of training and education, and described how to assess these competencies across educational levels (e.g., readiness for practica, internship, and entry to practice). The authors further characterized each core competency through its multiple elements. For example, the core competency of professionalism is characterized by the elements of integrity/honesty, deportment, accountability, concern for the welfare of others, and professional identity. An example of a student or trainee who displays problematic professional competence in professionalism might be cheating on assignments, falsifying information, and/or being disrespectful during interpersonal interactions with clients or colleagues. A description of each core competency and its elements is beyond the scope of this article (see Fouad et al., 2009, for a complete list). Student and trainees that display problems in one or more of the 15 core competencies are identified as STPPC for the purpose of this article.

Prevalence and Type of Competency Problems

There is little to no research evaluating the prevalence rate of undergraduate students with problematic professional competency. White and Franzoni (1990) evaluated 1st-year counseling
graduate students and found that they had significantly higher levels of psychopathology in comparison to the population in general, suggesting that undergraduate students with psychological problems may well advance to graduate training in psychology, where professional competence problems may arise (Vacha-Haase et al., 2004).

A few studies have evaluated the presence of problematic professional competency in graduate students (e.g., counseling, clinical, school psychology) through the use of questionnaires (Huprich & Rudd, 2004; Vacha-Haase et al., 2004). In a study of 81 graduate programs, Huprich and his colleague (2004) reported that 65% of programs had at least one or more current students with problematic professional competency, and 60% reported three or more within the past 10 years. In a study of 103 graduate programs, Vacha-Haase and colleagues (2004) reported that 52% of programs terminated at least one student in 3 years, which was typically attributed to clinical work problems. However, faculty and supervisors may not always be able to intervene with all students with problems in professional competence, or foresee students who may have problematic competency in the future.

In a study of 118 internship sites, 10% of programs reported knowing of at least one current trainee with professional competency problems and 35% reported three or more over the past 10 years (Huprich & Rudd, 2004). The study indicated that the most common problems identified during graduate programs and internships were difficulties with clinical work due to adjustment disorders, alcohol abuse, anxiety and depression, and personality disorders. At this time, the prevalence rate of competency problems in postdoctoral trainees is unknown.

MAJOR ETHICAL ISSUES OF GATEKEEPING

There are major ethical issues to consider when instituting gatekeeping functions during undergraduate, graduate, internship, and postdoctoral education and training. Ethical gatekeeping issues are highlighted by applying findings from previous literature and the Ethics Code (APA, 2002). Faculty and supervisors should aspire to uphold the ethical principles of beneficence and nonmaleficence, fidelity and responsibility, integrity, justice, and respect for people’s rights and dignity in their educational and professional interactions with STPPC. Faculty and supervisors must also adhere to the standards of the Ethics Code, specifically the standards relevant to resolving ethical issues, competence, human relations, privacy and confidentiality, record keeping, and education and training (APA, 2002, pp. 1063–1069). Subsequent sections discuss each ethical principle (General Principles A–E) as it applies to educational gatekeeping practices in psychology, the standards that support the themes of the ethical principles, and special considerations and ethical dilemmas that faculty and supervisors may encounter.

General Principle A (Beneficence and Nonmaleficence)

Principle A guides psychologists to “strive to benefit those with whom they work and take care to do no harm” (APA, 2002, p. 1062). Principle A is especially important in guiding educational gatekeeping practices, because it advises faculty and supervisors to be cognizant of the welfare of their students and trainees as well as the welfare of individuals with whom students and trainees interact (e.g., clients). Specifically, faculty and supervisors should seek to benefit their students and trainees by providing education and training that is developmentally
appropriate while making sure that these students and trainees are providing good care to their clients. At times, these two goals may conflict with each other and create an ethical dilemma (Kitchener, 1984). Faculty and supervisors must determine the amount of potential harm that clients might experience in the service of helping students and trainees develop professional skills. One way that faculty and supervisors manage this ethical dilemma is to aspire to implement ethical gatekeeping procedures to assess and remediate STPPC in a timely manner. Timely remediation that provides developmental road maps for STPPC merges faculty’s ethical commitments to their students with their ethical commitments to the clients served by students in training. Thus, Principle A provides guidance to faculty and supervisors at any stage of education or training.

**Supporting standards.** In support of General Principle A, Standard 3.04 explicitly states that “psychologists take reasonable steps to avoid harming their clients/patients, students, supervisees . . . and others with whom they work, and to minimize harm where it is foreseeable and unavoidable” (APA, 2002, p. 1065). Overall, the purpose of gatekeeping functioning at every stage of education and training in psychology is to avoid harm or foreseeable harm to clients, patients, students, supervisees, and others with whom they work. Individuals who enter and eventually graduate from doctoral internship and postdoctoral programs will ultimately benefit the public through competent research and practice. STPPC may be more likely to make poor judgments, exploit others, make mistakes, provide poor clinical care, and “project their own personal issues” (p. 21) onto others (Bemak, Epp, & Keys, 1999). These behaviors are potentially harmful to students and trainees when they pursue education and training in an area for which they will ultimately be unsuccessful. Such students and trainees may face increased rates of failure and be more likely to be exposed to increased stress, anxiety, damage to self-esteem, and depression as a result. Students and trainees may spend time and resources on education and training in psychology that may have been better spent on educational costs associated with another career that better matches their strengths.

As part of the remediation process, faculty and supervisors may require students and trainees to obtain individual or group therapy. Psychotherapy was cited as the most common remediation method for STPPC by faculty and supervisors (Forrest et al., 1999). When psychotherapy is used in remediation, Standard 7.05 requires faculty and supervisors to provide students and trainees with the option to choose “therapy from practitioners unaffiliated with the program” (APA, 2002, p. 1069). Faculty and supervisors must make their role as an educator/trainer clear and avoid entering into a multiple relationship with STPPC by providing therapy (Standard 3.05, APA, 2002, p. 1069). However, when faculty and supervisors use personal therapy as the sole form of remediation without any monitoring components, faculty are unable to evaluate STPPC progress to ascertain if the personal therapy remediation is positively affecting the professional competencies of concern (Elman & Forrest, 2004).

**General Principle B (Fidelity and Responsibility)**

General Principle B (Fidelity and Responsibility) advises psychologists to “consult with, refer to, or cooperate with other professionals . . . to serve the best interests of those with whom they work. They are concerned about the ethical compliance of their colleagues’ scientific and professional conduct” (APA, 2002, p. 1062). Principle B advises psychologists to consult with each other, a principle that would apply to faculty and supervisors implementing their gatekeeping
responsibilities with STPPC. Psychologists are also encouraged to be cognizant of maintaining competency, a principle that would apply to faculty and supervisors responsible for students and trainees’ professional behavior and performance during their education and training.

**Supporting standards.** General Principle B (Fidelity and Responsibility) is supported by multiple standards of the *Ethics Code*. The most basic method of intervening with STPPC is notifying students and trainees that there are potential problems with specific professional competencies. *Standard 1.04* requires psychologists to informally notify fellow psychologists of their potential ethical violations (APA, 2002, p. 1063). Applying this standard to education and training, faculty and supervisors have a responsibility to inform STPPC of their professional competency problems. Informally notifying STPPC of competency problems may be enough to resolve the problematic behaviors. However, at times, informal resolution may not be sufficient in remedying a problem and/or appropriate to the situation. In these cases, *Standard 1.05* directs psychologists to take “further action appropriate to the situation” (APA, 2002, p. 1063). This standard suggests that faculty and supervisors take formal and/or additional action to address STPPC, such as initiating a formal remediation process.

At times, faculty and supervisors will be presented with challenging and complex gatekeeping decisions regarding STPPC. *Standard 3.09* states that “when indicated and professionally appropriate, psychologists cooperate with other professionals in order to serve their clients/patients effectively and appropriately” (APA, 2002, p. 1065). Faculty and supervisors are encouraged to consult with each other to “serve” their students and trainees “effectively and appropriately.” *Standard 4.06* directly addresses the use of consultations by stating that psychologists “disclose information only to the extent necessary to achieve the purposes of the consultation” (APA, 2002, p. 1066). Oliver, Bernstein, Anderson, Blashfield, and Roberts (2004) reported that clinical psychology students endorsed the use of confidential “faculty consensus or extradepartmental consultation” (p. 144) in identifying students with competency problems. Faculty and supervisors should consult with colleagues when deemed necessary and provide information about the student or trainee that is pertinent to the situation.

*Standard 2.02* requires that psychologists “obtain the training, experience, consultation, or supervision necessary to ensure the competence of their services” (APA, 2002, p. 1065). This standard suggests that faculty and supervisors need to be well versed in the scholarship on STPPC and able to enact their gatekeeping responsibilities. Faculty and supervisors may not always be aware of the most appropriate gatekeeping practices for every situation presented with STPPC. For example, the intersection of diversity issues and STPPC can produce complex and challenging gatekeeping issues, and faculty and supervisors can greatly benefit from further development of their competence and consultations (Shen-Miller, Forrest, & Burt, in press). Faculty and supervisors are more likely to receive diverse insights and recommendations for implementing ethical gatekeeping practices with STPPC by consulting with each other. However, faculty and supervisors may also disagree on aspects of the most appropriate assessment, remediation, and/or termination procedures (Gizara & Forrest, 2004).

**General Principle C (Integrity)**

General Principle C (Integrity) encourages “psychologists to seek to promote accuracy, honesty, and truthfulness in the science, teaching, and practice of psychology” (APA, 2002, p. 1062). Faculty and supervisors are encouraged to be accurate, honest, and truthful in their “teaching” of
students and trainees, which is especially important when enacting their gatekeeping responsibilities. Principle C guides faculty and supervisors to strive to be transparent in their programs’ design, content, and expected outcomes. Faculty and supervisors should also aspire to be accurate and honest in their assessment and communication with students and trainees about their evaluation of their performance.

**Supporting standards.** In support of General Principle C, faculty and supervisors must abide by several standards to “promote accuracy, honesty, and truthfulness” in the education and training of psychology (APA, 2002, p. 1062). Psychology programs, at any stage of training from undergraduate to postdoctoral, are designed to “provide appropriate knowledge and proper experiences, meet requirements for licensure, certification, or other goals for which claims are made about the program” (Standard 7.01, APA, 2002, p. 1068). In doing so, students and trainees are aware of the purpose of the programs they are applying to or entering and the expected outcomes upon completion. For example, Loewy, Juntunen, and Duan (2009) highlighted that counseling students need a core set of virtues “to work competently and justly with diverse populations . . . and for successful completion of training” (p. 706). The authors stated that training values should be made readily available to students and trainees during the admissions process because this knowledge assists students and trainees to self-assess if they want/are able to pursue further education and training in the area the program is intended. Programs need to provide information for students and trainees to ascertain if the program is appropriate for the career they intend to pursue.

Furthermore, Standard 7.02 states that programs should “provide an accurate description of program content, training goals and objectives, and requirements that must be met for satisfactory completion of the program . . . made readily available to all interested parties” (APA, 2002, p. 1068). Accurate descriptions ensure that students and trainees are aware of the requirements that must be met to complete the program, as well as assessment, remediation, and termination procedures should the student or trainee fall short of the set expectations. In a study by Oliver and colleagues (2004), 53% of 46 surveyed clinical psychology students were unaware of “program protocols and procedures” for assessing students with problematic professional competencies. Also Standard 7.06 states that faculty and supervisors should provide accurate and timely feedback to students and trainees to improve in areas where they are not meeting standards (APA, 2002, p. 1069). In general, students and trainees should be aware of expectations prior to entering programs, as well as receive feedback on their performance to amend it if necessary.

**General Principle D (Justice) and E (Respect for People’s Rights and Dignity)**

The General Principles of Justice (D) and Respect for People’s Rights and Dignity (E) relate to issues of fairness and human rights. Principles D and E complement each other and are endorsed by similar standards in the Ethics Code; therefore they are discussed together. General Principle D states that “psychologists recognize that fairness and justice entitle all persons to . . . equal quality in the processes, procedures, and services being conducted by psychologists. Psychologists exercise reasonable judgment and take precautions to ensure that their potential biases . . . do not lead to or condone unjust practices” (APA, 2002, p. 1062–1063). At times, psychologists may have difficulty determining what is “just” and “fair” in a given situation,
as the individuals with whom they work are not identical on all variables (Kitchener, 1984). Psychologists should seek to be fair and just while being cognizant of relevant cultural, individual, and/or role differences. According to Principle D, faculty and supervisors should behave this way themselves and aspire to educate and train students and trainees in a similar manner, as well as attempt to keep gatekeeping practices fair and just for each STPPC.

Principle E states that “psychologists respect the dignity and worth of all people, and the rights of individuals to privacy, confidentiality, and self-determination. Psychologists are aware of and respect cultural, individual, and role differences . . . and consider these factors when working with members of such groups” as well as “try to eliminate the effect on their work of biases based on those factors” (APA, 2002, p. 1063). In relation to educational gatekeeping procedures, Principle E asks faculty and supervisors to respect the dignity and worth of their students and trainees. STPPC may have cultural, individual, and/or role differences that may or may not be related to their problems with professional competence. Faculty and supervisors should aspire to be sensitive to these individual and cultural differences, and prevent unwarranted personal biases from interfering with their gatekeeping practices.

**Supporting standards.** In support of Principles D and E, the *Ethics Code* requires faculty and supervisors to abide by multiple standards. Faculty and supervisors should be cognizant of the potential for unfair discrimination of students and trainees due to variables of “age, gender, gender identity, race, ethnicity, culture, national origin, religion, sexual orientation, disability, socioeconomic status, or any basis proscribed by law” (*Standard 3.01*, APA, 2002, p. 1064). These variables are complex and should be considered when appropriate (Shen-Miller et al., in press; Shen-Miller, Forrest, & Elman, 2009). Shen-Miller and colleagues highlighted the complexities that occur when diversity and STPPC interact, as well as how these interactions influence faculty and supervisors during gatekeeping practices. However, these variables should not be used to unfairly and/or negatively influence the assessments of students or trainees. Faculty and supervisors should take care to ensure that unfair discrimination does not occur when evaluating students and trainees with potentially problematic professional competency. Precautions should be taken to ensure that students and trainees are evaluated fairly and objectively, and all efforts should be documented to protect programs from litigation from terminated STPPC (Forrest et al., 1999). Gilfoyle (2008) identified precautions that faculty and supervisors should take to minimize the legal risk to programs by ensuring fairness in the gatekeeping practices among students and trainees.

Faculty and supervisors should also be respectful of students’ and trainees’ rights to privacy, and not require them to “disclose personal information . . . either orally or in writing, regarding sexual history, history of abuse or neglect, psychological treatment, relationships with parents, peers, and spouses or significant others” (*Standard 7.04*, APA, 2002, p. 1068). Irrelevant personal information can be problematic in evaluating student and trainee performance and may unjustly skew faculty and other supervisors’ perceptions and assessments of the student or trainee. The only exception is if the program requires such information, as stipulated ahead of time, or if the information is needed to “evaluate or obtain assistance for students whose personal problems could reasonably be judged to prevent them from performing their training or professionally related activities in a competent manner or posing a threat to the students or others” (*Standard 7.04*, APA, 2002, p. 1068). Programs should make students and trainees aware of a mandatory disclosure requirement before or upon entry into programs.
In all cases where any action is taken, from identification to termination of STPPC, programs and supervisors need to create, control, maintain, and store records and data relating to students’ and trainees’ professional work in a confidential manner (Standards 6.01 and 6.02, APA, 2002, p. 1067). Professional and confidential documentation is especially important with regard to the physical location of personal information, whether stored on computers and/or in physical files, and special care should be taken to ensure these documents are secure (Pope & Vasquez, 2007). Faculty and supervisors should take “precautions to protect confidentiality” and limit knowledge to individuals that are “clearly concerned with such matters” (Standards 4.01 and 4.04, APA, 2002, p. 1066). They must use their best judgment to determine the individuals that are “clearly concerned with such matters,” or have a need to know, to gain information or provide information to/from relevant parties. At times, faculty and supervisors may determine that fellow students and trainees have a need to know about aspects of gatekeeping procedures of STPPC in their programs. In a study of clinical psychology students, Oliver and colleagues (2004) reported that students generally felt that problematic competency issues were not sufficiently addressed by their programs. By informing peers about gatekeeping procedures of STPPC, peers can be made fully aware of competency standards and gatekeeping procedures and reassured that faculty and supervisors will enforce standards of professional competency through remediation and/or dismissal of STPPC. Alternatively, if faculty and supervisors include peers in gatekeeping procedures, STPPC may feel embarrassment and/or be stigmatized even after they are remediated. Therefore, the decision to inform peers about faculty gatekeeping processes is a sensitive issue, creates an ethical dilemma for faculty and supervisors, and should be considered carefully. However, faculty and supervisors should not discuss sensitive information about STPPC with anyone other than relevant individuals—this includes refraining from discussing information in public, gossiping about the student/trainee situation, and/or leaving information where it can be easily overheard or viewed (Pope & Vasquez, 2007).

In general, these principles and standards should be applied throughout the gatekeeping process in undergraduate, graduate, internship and postdoctoral training programs. Programs should institute these practices in an appropriate manner by maintaining the ethical principles and standards identified in the Ethics Code. Each stage of education and training carries its own unique ethical considerations.

**UNDERGRADUATE STUDENTS**

Although there are overlapping ethical aspects of gatekeeping in undergraduate and graduate programs, the undergraduate program brings its own distinct set of ethical issues. The completion of an undergraduate degree is the first stepping stone toward a career in psychology. Undergraduate students are initially exposed to the field of psychology through the completion of introductory coursework and research. Undergraduate students are at the very beginning of their training in psychology and will develop professional competencies at different rates. As a result, faculty may have more difficulty assessing and/or remediating undergraduate students with problematic professional competencies. Undoubtedly, undergraduate students may consider pursuing further education and ultimately a career in psychology. Faculty have an ethical obligation to serve not just as mentors but as gatekeepers into the field, to direct students into careers in which they will be successful (psychology or otherwise).
Gatekeeping in undergraduate programs may be more difficult than more advanced training programs because students are less likely to be accurately assessed across a range of abilities and to receive guidance. Undergraduate students typically attend larger classes, and therefore they have less direct interaction with faculty, supervisors, or individuals who may serve to evaluate their suitability and progress. In fact, undergraduates may only attend classes and have less exposure to clinical experience, which limits students’ evaluations to “grades only” and hinders the faculty’s ability to evaluate interpersonal competencies. Finally, due to less direct faculty interaction, students who are interested in more advanced training may be left without formal guidance into appropriate education and careers. These limitations may hinder a thorough evaluation for every student in an undergraduate program, but instituting some aspects of gatekeeping functions is possible. For example, an undergraduate program at the University of Oregon implements a rigorous application and screening process, diverse training experiences to assess competencies (e.g., clinical settings, seminars, supervisions), and informal/formal remediation efforts (Lichtenstein, Lindstrom, & Kerewsky, 2005).

There are unique aspects of undergraduate gatekeeping practices that should be addressed. At this stage, the crux of the gatekeeping responsibilities falls on undergraduate advisors, psychology faculty, and even graduate students. Graduate students may work directly with undergraduate students, and therefore they may be the closest individuals to assess undergraduate students’ suitability for the field and provide in depth career guidance. Undergraduate advisors, faculty, and graduate students should take an active role to evaluate students objectively, implement remediation if necessary, and/or provide career guidance (APA, 2002). The gatekeeping process may prevent undergraduate students from spending time and resources in an area of study in which they are not well suited and may not be successful.

Whereas the number of graduate, internship, and postdoctoral students and trainees in a program is usually quite small, the number of undergraduate psychology students is commonly quite large in comparison. Faculty and supervisors may expect more diversity within this population, especially related to cognitive abilities. Advisors and professors must take special care to ensure that students are not unfairly discriminated against (Standard 3.01, APA, 2002, p. 1064). Formal training for advisors and professors, and even graduate students, should be provided on how to assess students with potential problems with professional competence (academic, interpersonal), as well as clear procedures for intervening with these students if needed (Standards 7.01 and 7.02, APA, 2002, p. 1068). At this stage of education, appropriate gatekeeping techniques are primarily focused on identifying and remediating students with problematic professional competencies (e.g., academic abilities, interpersonal skills, professionalism). In more severe cases, faculty may advise undergraduate students with competency problems to pursue alternative career opportunities that are better suited to their strengths.

**GRADUATE TRAINING**

During graduate training, students are exposed to coursework, practica, and externships that specifically prepare them for a career in professional psychology. Whereas graduate training is more advanced than undergraduate education, graduate training also permits more scaffolding than internship and postdoctoral training programs. Faculty and supervisors are able to assess graduate students in multiple settings across multiple competencies through a variety of methods,
such as grades, formal evaluations of clinical work, and informal feedback. As previously discussed, students develop professional competencies at different rates, and the length of a graduate program permits students the time to develop differentially and where necessary remediate problematic professional competencies. There are special ethical considerations of implementing ethical gatekeeping procedures that are unique to professional psychology academic programs.

Graduate students make a major decision to commit to advanced education in psychology. Currently, the average length of time to complete a doctoral degree is 5 to 6 years (APA, 2011). Furthermore, the amount of debt accrued related to graduate education can potentially be quite large, with 2011 internship applicants reporting an average debt of $85,545 and approximately 44% reporting more than $100,000 of debt (Association of Psychology Postdoctoral and Internship Centers, 2011). Graduate students must be made aware of program content, goals, objectives, and requirements to self-assess if a specific academic program is appropriate for their career goals and abilities (Standard 7.02, APA, 2002, p. 1068). The Council of Chairs of Training Councils (CCTC; 2004) endorses that, prior to entry to a program, students and trainees be made aware of methods used to assess and ensure competencies at graduation. Graduate students should also be made aware of assessment, remediation, and termination procedures should they display problems with professional competencies. Graduate students are more likely to complete and be successful in programs when they are aware of program content and expectations, thus avoiding potential competency problems and subsequent gatekeeping efforts.

In contrast to undergraduate students, graduate students are formally introduced to and trained in clinical work through coursework, practica, and externships. Faculty and supervisors have the opportunity to observe and assess graduate student clinical competency skills, such as interpersonal, assessment, and intervention skills. Graduate students are beginning to learn the functions of a professional psychologist, and faculty and supervisors are aware that developing professional competency skills may take time. As previously discussed, the Benchmark document assists faculty and supervisors on how to assess graduate student competencies of readiness for practica and readiness for internship (Fouad et al., 2009). Graduate programs prepare students for more advanced clinical training in internship and postdoctoral work. Implementing ethical and effective gatekeeping practices during graduate training is especially important for promoting success during internship and postdoctoral training.

Problems may arise when there is a lack of communication and/or miscommunication between graduate programs and practica or internship programs regarding students with problematic professional competencies. For example, letters of recommendation provided to internship programs may be “exaggerated . . . unrealistic . . . inflated” (p. 115), with student competency problems minimized or even hidden (Miller & Van Rybroek, 1988). Internship programs may not always be aware of trainees’ history of problematic professional competencies unless graduate programs provide this information. The CCTC (2007) fully endorses two-way communications between graduate and internship programs regarding known student and trainee competency problems and remediation efforts. When internship programs are fully and accurately informed about incoming trainees with a history of problematic professional competencies, they can focus their training efforts in a timely manner (CCTC, 2007). Similarly, graduate programs would benefit from receiving information from internship programs about trainee progress, which could lead graduate programs to amend their education and training efforts. Faculty and supervisors should consider issues of confidentiality (Standards 4.01, 4.02, and 4.06, APA, 2002, p. 1066) in
two-way communications between graduate and internship programs, and students should be informed in advance that such communications will occur. Two-way communications that are accurate and representative may ultimately benefit the STPPC and prevent harm to those with whom they interact and serve (Standard 3.04, APA, 2002, p. 1065).

**INTERNSHIP AND POSTDOCTORATE TRAINING**

Implementing gatekeeping functions during the internship and postdoctoral stages may also prove to be more difficult than during graduate programs and carry unique ethical considerations. The internship and postdoctorate placements are the final training steps toward a career in psychology and the last opportunity to implement gatekeeping functions (McCutcheon, 2008). Trainees participate in internship training for only a brief time (usually 1 year) in comparison to multiyear practica and extern experiences to demonstrate that they are able to work independently and effectively. Upon graduating from an internship or postdoctoral site, the program is “endorsing” the trainee as a competent clinician who is capable of working independently in a professional capacity. There is an ethical obligation of supervisors to implement gatekeeping functions at this final point in the formal training process to protect the public.

Several authors have discussed how to implement recognition, assessment, remediation, and termination procedures of trainees with problematic professional competence in the setting of internship sites (Elman, Illfelder-Kaye, & Robiner, 2005; Falender, Collins, & Shafranske, 2009; Forrest et al., 1999; Fouad et al., 2009; Gizara & Forrest, 2004; Kaslow et al., 2007; Lamb et al., 1987). These authors recommended formal gatekeeping procedures, which include supervision training for supervisors, establishing clear definitions of minimum standards of competence, outlining program policies for trainees, establishing benchmarks of performance, creating a collaborative effort among supervisors to identify and determine appropriate actions, and protocols for interacting with the trainee’s peers. Although thoroughly exploring these processes are beyond the scope of this article, major ethical considerations must be addressed when implementing these practices.

During internship and postdoctoral training, supervisors may be less likely to intervene with problematic trainees because trainees have already attained previous education and experience, invested a large amount of time and financial resources, and have been passed by their academic programs. The late stage of training makes the process of remediating trainees with problematic professional competence more difficult. Furthermore, the process of assessing and intervening with such trainees may also be confrontational, and supervisors may fear litigation (Enochs & Etzbach, 2004; Finch, 2010; Lichtenberg et al., 2007). These limitations highlight the need for standardized assessment procedures, training for supervisors, consultations, and timely feedback within internship and postdoctoral sites as well as with the faculty at the academic program.

Internship and postdoctoral trainees also rely heavily on faculty and supervisor networks for training and employment opportunities; therefore, confidentiality during gatekeeping practices is extremely important (Standard 4.01, APA, 2002, p. 1066). Information regarding identification and remediation with a trainee with competence problems should be limited to individuals involved with the trainee or for consultation purposes, as revealing such information to others could be quite damaging to the trainee (Standards 4.01, 4.04, and 4.06, APA, 2002, p. 1066). Trainees with competency problems can be remediated and successfully complete professional
training programs. When personal information about trainees with competence problems is revealed to uninvolved individuals, obtaining objective evaluation by other supervisors may be more difficult and/or may negatively impact the ability of the trainee to obtain future employment. However, determining the degree to which individuals with a need to know should be informed of competency problems creates an ethical dilemma for faculty and supervisors. As previously discussed, faculty and supervisors must make difficult decisions regarding the amount of potential harm others (e.g., clients) may experience as a result of trainee development.

Special ethical considerations should be made for postdoctoral trainees. At this stage, the individual has been passed by multiple programs (graduate and internship) and has obtained the doctorate title. The ethics of the gatekeeping functions previously discussed apply to the postdoctoral stage of training. However, it may be more appropriate to view this type of intervention as career counseling rather than gatekeeping.

**RECOMMENDATIONS FOR ETHICAL EDUCATIONAL GATEKEEPING PRACTICES IN PSYCHOLOGY**

The following are recommendations for faculty and supervisors to implement ethical educational gatekeeping functions throughout the various stages of education and training in psychology. Although these recommendations may be difficult to implement, they are important for students, trainees, faculty, supervisors, and the individuals with whom they work. These recommendations are supported by the *Ethics Code* (APA, 2002, pp. 1063–1069).

Faculty and supervisor recommendations include

- minimizing harm to students and trainees (as well as those whom they interact) by implementing ethical and appropriate gatekeeping policies and procedures (*Standard 3.04*);
- notifying students and trainees of potentially problematic competency issues and facilitating remediation when appropriate (*Standard 1.04*);
- recognizing that students and trainees develop competency at differential rates and developing remediation efforts that allow for enough time to correct deficiencies;
- ethically consulting with colleagues regarding challenging, complex, and/or diversity-related issues (*Standards 2.02, 3.09, and 4.06*);
- respecting cultural, individual, and role differences, and being cognizant of how these factors interact with competency judgments (*Standards 3.01*);
- maintaining agreements about boundaries of privacy and confidentiality among all parties involved with gatekeeping functions (*Standards 4.01, 4.02, 4.04, 6.01, 6.02, and 7.04*);
- documenting and maintaining records of gatekeeping efforts (*Standards 6.01 and 6.02*);
- providing program policies in a publicly accessible format, specifically describing program content and outcomes as well as gatekeeping procedures (*Standard 7.01 and 7.02*);
- carefully evaluating required psychotherapy remediation efforts for STPPC to ensure that agreements about the boundaries of privacy are in place in advance and any later disclosures do not surprise the STPPC (*Standard 7.05*); and
- providing timely feedback to STPPC that establishes clear goals and promoting an active chance to achieve goals (*Standard 7.06*).
CONCLUSION

Educational gatekeeping functions in psychology should serve the best interests of students and trainees, as well as the individuals with whom they work. Faculty and supervisors should be cognizant of the diverse ethical considerations that may arise when implementing gatekeeping functions with undergraduate, graduate, internship, and postdoctoral STPPC. Implementing highly ethical gatekeeping practices may often be difficult and lead to ethical dilemmas, as faculty and supervisors may determine that there are “good, but contradictory ethical reasons to take conflicting and incompatible courses of action” (Kitchener, 1984, p. 43). The issues and recommendations discussed in this article have implications for faculty, supervisors, and students/trainees at a program level. Future directions of this line of work may be applied at an organizational level. Faculty and supervisors may benefit from more direct guidance from the APA regarding ethical gatekeeping procedures, such as including specific gatekeeping standards in future amendments of the Ethics Code (APA, 2002). At any stage of education and training, faculty and supervisors should refer to the principles and standards identified in the Ethics Code during their professional and educational activities, and especially when implementing ethical educational gatekeeping functions with STPPC.

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REFERENCES


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