Temporary Policy for Graduate Student
Telebehavioral Health Service Delivery During Field Placement Training

In the face of the COVID-19 pandemic, the Department of Counselor Education and Family Therapy (hereinafter referred to as “Department”) at Central Connecticut State University has developed a temporary policy effective June 14, 2020 to address the concerns of our graduate students and program partners (i.e., agencies, schools, colleges, and universities) regarding field placements. Practicum and internship field placements are at the core of our Department’s clinical training programs that prepare counselors and therapists to serve and empower diverse individuals, families, and communities.

In response to the ever-changing environment, the Department acknowledges the evolving complexities of national, state, and university guidelines and recommendations which impact the ability of our students ability to participate in face-to-face counseling and therapy as part of their required field placement (NOTE: this does not include placements which are non-clinical in nature). Telebehavioral health (or distance counseling/therapy) is defined as providing counseling/therapy via telephone, chat, or visual contact through an online HIPAA compliant platform. This policy acknowledges that is the ethical responsibility of the professional counselor/therapist to protect and support the quality of counseling and therapy services for the wellbeing of clients.

The Department understands the inherent concerns related to telebehavioral health. Many counselors and therapists in training, supervisors, and clinicians who are not yet knowledgeable and competent in the delivery of telebehavioral health are at risk of committing both ethical and legal violations. After careful consideration and consultation, the Department will allow our graduate students to participate in telebehavioral health-related activities within the context of their practicum and internship settings only if the parameters set forth by the Department are met by our program partners and students.

Each Department program (Clinical Professional Counseling, Marriage and Family Therapy, School Counseling, and Student Development in Higher Education) has specific protocols, procedures, and requirements that must be agreed upon by a field placement site BEFORE students can begin a practicum or internship field experience involving participation in telebehavioral health-related service delivery activities (please refer to the document on the page 2). Parameters, documentation requirements, screening, and approval procedures have been developed with consideration to (a) the professional codes of ethics and scope of practice recommendations specific to each program within the Department; (b) the State of Connecticut’s legal parameters that are in place at the time of this policy [e.g., Governor’s Executive orders]; and (c) national laws/regulations and accreditation guidelines regarding telebehavioral health. These requirements are intended to address knowledge, practice competency, legal, ethical, and regulatory requirements, confidentiality and privacy, HIPAA guidelines, risk and liability, and informed consent when providing telebehavioral health services via technology. The Department acknowledges that documentation screening and approval procedures may differ from program to program given the unique aspects of accreditation and professional licensure and certification requirements.

The Department emphasizes to our students and program partners that there may be a need to periodically revise telebehavioral health policies and procedures in response to unexpected fluctuations that may occur regarding the COVID-19 pandemic; therefore, the Department reserves the right to modify and change parameters and expectations of student participation in telebehavioral health activities when deemed necessary.
**Department of Counselor Education and Family Therapy**

**Procedures, Protocols, and Requirements for**

**Graduate Student Telebehavioral Health Service Delivery During Field Placement Training**

*(Clinical Professional Counseling Program)*

For any field placement site that desires our clinical professional counseling graduate students participate in telebehavioral health-related activities during their field training, the site must complete, sign, and return the documents in their entirety (pp. 1-2) to the Department’s Telebehavioral Health Coordinator whose contact information is provided within the body of the email used to send these documents. Please note, the site must wait for the Department to review the completed documents and confirm approval before the student will be allowed to participate in telebehavioral health-related activities and service delivery during their clinical field placement training.

CCSU Student Name: ____________________________________________________________

Name and Address of Field Placement Site:
______________________________________________

Field Placement Contact Name/Title/Phone #/E-mail Address:
______________________________________________

By checking the following items, the field placement site affirms a “yes” response, acknowledges agreement with the terms and requirements of the Department’s policies and procedures regarding graduate student telebehavioral health service delivery during field placement training, confirms that the terms for each item are actively in place, and assumes responsibility for providing the required training, oversight, clinical supervision, and technology and related equipment needed while any Department graduate student participates in telebehavioral health-related activities and service delivery during their field placement training:

- Requests the Department’s graduate student(s) participate in telebehavioral health service delivery while engaging in their clinical field placement training at the site.
- Evidence of training and preparation of student(s) in providing counseling via telebehavioral health: the field placement site is responsible for providing the necessary training to the student(s) on the placement site’s telebehavioral health platform, processes, procedures, privacy of location, and use of reliable technology and related equipment.
- Field placement site has the following documentation in place for telebehavioral health services:
  - Evidence that site supervisor is appropriately trained in telebehavioral health and clinical supervision.
  - Evidence of identified HIPAA compliant platform will be used for telebehavioral health service delivery, including the use of encrypted programs for texting/messaging/communicating with clients and privacy of service location.
  - Informed consent procedures for clients-including a discussion of the purpose of the counseling, privacy and confidentiality, and use of technology with the client-regarding the provision of telebehavioral health services.
  - Evidence of field placement site’s procedure regarding an identified emergency contact for use by the client as well as the graduate student(s).
- Specific guidelines regarding assessment of client dangerousness/risk of harm (including screenings and assessments that are completed virtually) and an outlined plan to immediately assist the graduate student and/or client, including the following:
  - Protocol is in place for the graduate student to contact and immediately access the site’s clinical supervisor (or their equivalent designee) while the student is in a telebehavioral health session with a client.
  - Procedure is in place while the student is in a telebehavioral health session with a client should an urgent intervention or emergency care be required, including but not limited to concerns related to client dangerousness/risk of harm.
- Evidence of and confirmation that the field placement site, site clinical supervisors, and graduate students will follow all ethical and legal guidelines and regulations for the provision of telebehavioral health services.
- Agreement each student will receive individual supervision at least one (1) hour per week (may be conducted virtually/on-line) and a site supervisor is available at all times, especially while the student is providing “live” telebehavioral health services.
- Procedure for administrative and clinical documentation requirements (i.e., completed virtually/electronically in accordance with HIPAA guidelines or submitted via curb-side drop off at the site with minimal or contactless delivery).
- Placement site is aware students will receive routine group seminar supervision from Department faculty during the course of the academic semester and agrees to inform faculty of any issues or concerns should they arise.

Field Placement Site Representative Name/Signature____________________________________ Date__________________

CCSU Student Name/Signature__________________________________________ Date__________________

****************************************************************************** FOR DEPARTMENTAL USE ONLY******************************************************************************

I have reviewed this form and verify the site listed above is an approved field placement site for training our graduate students on the provisions and service delivery of telebehavioral health.

Department Coordinator Name/Signature__________________________________________ Date__________________