



DEPARTMENT OF  
COUNSELOR EDUCATION AND FAMILY THERAPY



Central Connecticut State University

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**Policy and Procedure for Graduate Student**

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

**[Clinical Professional Counseling and Marriage & Family Therapy Program Students Only]**

The Department of Counselor Education and Family Therapy, hereinafter referred to as 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. 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 well-being 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. 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 graduate students.**

The Clinical Professional Counseling and Marriage and Family Therapy Programs have 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 that involves participating in telebehavioral health-related service delivery activities. Parameters, documentation requirements, screening, and approval procedures have been developed with consideration to the following:

- 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 any given time (e.g., Governor's Executive orders)
- c. The 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.

**NOTE: This telebehavioral health policy does not pertain to Departmental programs whose field placements are non-clinical in nature (School Counseling and Student Development in Higher Education).**

**Policy and Procedure Requirements for  
Graduate Student Telebehavioral Health Service Delivery  
During Field Placement Training**

**[Clinical Professional Counseling and Marriage & Family Therapy Program Students Only]**

Every field placement site must complete the following form to indicate their intention to involve our clinical professional counseling (CPC) and marriage and family therapy (MFT) graduate students with telebehavioral health-related activities during their field training.

- Any field placement site that will **not involve students** in telebehavioral-related activities need to only complete **Sections 1 and 4 below**, and then sign and return the document in their entirety (pp. 2 and 5).
- Any field placement site that desires our students to participate in telebehavioral health-related activities must complete **all** four sections, and then sign and return the documents in their entirety (pp. 2 through 5).

The completed and signed forms may be provided to the student; however, the student must provide a signed copy to their faculty supervisors \*before they can engage in any telebehavioral-related clinical activity.

**\*NOTE:** The student and field placement 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.

**SECTION 1**

Name and Address of Placement Site:

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Student Name(s):

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Primary Field Place Site Supervisor Name/Contact Information/Phone #/E-mail Address:

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Do you intend to involve our students with telebehavioral health related activities at any point during their placement at the above listed site?

- YES (complete section 2 – 4 below)  
 NO (skip to section 4)

## **SECTION 2**

By checking the following items, the field placement site (a) affirms a “*yes*” response; (b) 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; (c) confirms that the terms for each item are actively in place; and (d) 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

### **SECTION 3**

In addition to the aforementioned requirements, the field placement site affirms a “**yes**” response by checking the following items, thereby acknowledging agreement with the terms and requirements of the Department’s policies and procedures regarding graduate student telebehavioral health service delivery during field placement training.

#### **Complete for PRACTICUM Field Placements:**

- Use of approved on-line video HIPAA compliant platforms are permissible for agency supervision sessions, staff meetings, trainings and in-service activities, and other relevant meetings.
- During the one academic semester for the CPC practicum experience, or during the first academic semester for the MFT practicum experience, students may only participate in on-line shadowing or observation of agency therapists conducting therapy sessions with client consent.  
*NOTE: The agency is responsible for ensuring appropriate, HIPAA-compliant informed consent is obtained.*
- During the second academic semester for the MFT practicum experience (does not apply to the CPC program), students may only participate in co-therapy with agency staff members.
- Practicum students are not allowed to do solo telebehavioral health therapy—no exceptions!
- Practicum students will provide monthly documentation to their practicum faculty instructor of their activities at their placement site, including telebehavioral health, on-line trainings/in-services, meetings, and supervision.

#### **Complete for INTERNSHIP Field Placements:**

- Use of approved on-line video HIPAA compliant platforms are permissible for agency supervision sessions, staff meetings, trainings and in-service activities, and other relevant meetings.
- With client consent, intern students may participate in on-line shadowing or observation of agency therapists conducting therapy sessions.  
*NOTE: The agency is responsible for ensuring appropriate, HIPAA-compliant informed consent is obtained.*
- Interns may participate in co-therapy with agency staff members (OR) they may conduct solo therapy sessions as long as they are provided appropriate supervision, have real-time access to a supervisor to address emergency situations, and follow the parameters and guidelines of the agency as well as the Department of Counselor Education and Family Therapy.

#### **Supervision Requirements (Complete for Practicum and Internship Placements):**

- Agencies must ensure that an agency supervisor is available at all times while students are engaging in telehealth services.
- Live weekly supervision requirements remain the same as those outlined in the *Letter to Site Supervisor* (CPC program) and *Site Supervisor Manual* (MFT program).

#### **Miscellaneous Requirements (Check Based Upon the Student’s Degree Program):**

- For students in the **Clinical Professional Counseling** program, no more than 20% of their direct client clinical contact hours (x) can be obtained through telebehavioral health-related services (i.e., practicum:  $x \leq 8$  clinical hours; internship:  $x \leq 48$  clinical hours).
- For students in the **Marriage and Family Therapy** program, no more than 20% of their direct client clinical contact hours (x) can be obtained through telebehavioral health-related services (i.e.,  $x \leq 80$  hours clinical hours).

## SECTION 4

### **SUBMITTING THE ATTESTATION:**

By signing the document, both the field placement site and student acknowledges they have reviewed and agree to the Department's *Policy and Procedure for Graduate Student Telebehavioral Health Service Delivery During Field Placement Training* in its entirety. The site and student also acknowledge understanding that the Department may need to periodically revise telebehavioral health policies and procedures in response to unexpected fluctuations that may occur; therefore, the Department reserves the right to modify and change parameters and expectations of student participation in telebehavioral health activities when deemed necessary. Lastly, the site and student recognize that failing to comply with the terms of this policy jeopardizes the collaborative partnership between the Department and the field site as well as places the student at risk of a remediation plan being initiated by Department faculty.

Field Placement Site Representative Name & Signature:

\_\_\_\_\_ Date: \_\_\_\_\_

Site Supervisor Name & Signature (if different from above):

\_\_\_\_\_ Date: \_\_\_\_\_

Student Name & Signature:

\_\_\_\_\_ Date: \_\_\_\_\_

**NOTE:** Please provide the signed document to the student, who will in turn submit it to their faculty supervisor **within the first two weeks of the semester**—sites and students should retain a copy for their own files.

### **POLICY & PROCEDURE REVIEW / DEPARTMENT APPROVAL**

The *Policy and Procedure for Graduate Degree Telebehavioral Health Service Delivery During Field Placement* was reviewed and approved for immediate implementation by faculty members of the Department of Counselor Education and Family faculty members on **APRIL 22, 2022**.

NOTE: All program coordinators within the Department of Counselor Education and Family are responsible for integrating this information into their respective student handbooks, and a current copy should always be maintained in departmental files as well as uploaded on each program's webpage.