


Employee Assistance Program		<u>Original Effective Date</u>	<u>Business Owner</u>
		January 7, 2020	Suzie Sweeney, Program Director
		<u>LOP #</u>	<u>Last Revision Date</u>
		EAP.TELE.LOP.001	December 14, 2022
	Title: Telemental Health: Program Overview	<u>Last Approval Dates (Up to 3)</u>	<u>Approved By</u>
		<ol style="list-style-type: none"> 1. December 14, 2022 2. December 15, 2021 3. January 7, 2020 	Operations
		<u>Regulatory Elements(s)</u>	
		NA	
Approver's Name (Printed): Suzie Sweeney		Title: Program Director	
Approver's Signature: Electronic Signature in C360		Date: 12/14/2022	

1.0 PURPOSE

The purpose of this policy is to outline and define a Telemental Health Program for the provision of Employee Assistance Program ("EAP") services.

2.0 APPLICABILITY

This policy applies to the Company's Employee Assistance Program ("EAP").

3.0 POLICY

3.1 The Company recognizes the importance of providing Telemental Health sessions as a means to provide face-to-face EAP visits.

3.1.1 Telemental Health is a form of interactive videoconferencing that is critical in providing direct care services in rural areas of the country or when a Consumer is not physically able to attend an "in person" face-to-face clinical session.

3.1.2 By providing Telemental Health sessions, the Company is able to overcome any obstacles that may prevent Consumers and/or their family members from scheduling EAP sessions.

3.1.3 It also allows them to schedule and participate in an EAP session that is convenient to them.

3.2 Services Provided: The Company's Telemental Health Program is designed to mirror out existing "in-person" face-to-face EAP counseling program and will consist of the same basic elements. These elements include:

3.2.1 Scheduling: Consumers are able to schedule Telemental Health sessions at a time that is convenient for them.

- 3.2.2 Clinicians: Telemental health sessions are provided by a clinician who is credentialed and is on the Company's Affiliate EAP Clinician panel.
- 3.2.3 Delivery: The Company's Telemental Health sessions will be delivered by a clinician who is in the same state as the Consumer.
- 3.2.4 Comprehensive Psychosocial Assessments: All Consumers seeking Telemental Health sessions will receive a Comprehensive Psychosocial Assessment at the start of the sessions.
 - 3.2.4.1 Once the assessment is complete, the clinician will identify goals for the short-term counseling and/or identify referral resources for the Consumer.
- 3.2.5 Short-Term Counseling: If the Consumer's assessed problems can be addressed within the Consumer's EAP session model, the clinician will assist the Consumer by providing solution-focused, short-term, counseling.
- 3.2.6 Referrals: If the Consumer's assessed problems cannot be addressed within the Consumer's EAP session model, the clinician will assist the Consumer in identifying and connecting to referral resources.
 - 3.2.6.1 Any remaining EAP sessions may be used to ensure a seamless transition to the referral(s).
- 3.3 Target Population
 - 3.3.1 The target population of the Company's Telemental Health Program consists of:
 - 3.3.1.1 Consumers and/or family members who do not live within thirty (30) miles of an EAP Affiliate Clinician.
 - 3.3.2 Consumers and/or family members who are not physically able to attend an "in-person" session with an EAP Affiliate Clinician who is located within thirty (30) miles of the Consumer.
- 3.4 Telemental Health Technology: The Company uses Zoom as its Telemental Health Platform. The platform provides:
 - 3.4.1 HIPAA Compliance: Zoom is compliant with the HIPAA Security Rules.
 - 3.4.2 Consumer Waiting Rooms: Consumer waiting rooms provide privacy during back to back Telemental Health sessions.
 - 3.4.3 Remote Sessions: Whether from home or from another secure location, Consumers are able to connect with a clinician to receive counseling services.
 - 3.4.4 Chat/Messaging: Consumers and clinicians are able to send texts, images, and audio files across desktop, laptop, tablet, and mobile through a secure connection.
 - 3.4.5 iOS/Android Compatible – In addition to accessing services via a computer or laptop, Consumers are also able to access services via their smartphone.

3.5 Space Requirements

3.5.1 Clinicians: While Telemental Health sessions can be provided anytime or anywhere, clinicians are expected to provide sessions in a professional setting that ensures the Consumers' confidentiality.

3.5.1.1 Sessions can take place in physical or remoted offices.

3.5.1.2 Sessions cannot take place in any public setting or a setting that could compromise the Consumer's confidentiality.

3.5.2 Consumers: Consumers are strongly encouraged to engage in Telemental Health sessions via a setting that ensures their confidentiality (i.e. their home or a private office).

3.6 EAP staff are educated on this policy during initial training as well as during monthly staff meetings, as needed.

4.0 DEFINITIONS

4.1 Affiliate EAP Clinician – means an EAP Company network clinician.

4.2 Company – means Keystone Peer Review Organization, Inc. (“Kepro”) and its affiliates.

4.3 Comprehensive Psychosocial Assessments – means an evaluation of a person's mental health, social status, and functional capacity.

4.4 Consumer – means a person who is the direct or indirect recipient of services of the Company.

4.4.1 Depending on the context, Consumers may be identified by different names, such as "member," "enrollee," "beneficiary," "patient," "claimant," etc.

4.4.2 A Consumer relationship may exist even in cases where there is not a direct relationship between the Consumer and the Company.

4.4.2.1 For example, if an individual is a member of a health plan that relies on the services of a utilization management organization, then the individual is a Consumer of the utilization management organization.

4.4.3 In the case of a Consumer who is unable to participate in the decision-making process, a family member or other individual legally authorized to make health care decisions on the Consumer's behalf may be a Consumer for the purposes of this policy.

4.5 Health Insurance Portability and Accountability Act (“HIPAA”) – means the legislation created to improve access to health insurance, protect the privacy of health care information, and promote standardization of electronic health care related records.


4.6 Telemental Health – means the provision of face-to-face EAP sessions via a secure videoconferencing platform.

5.0 RELATED DOCUMENTATION

None

Revision Summary

Review Date	Doc. Id No.	Rev #	Approving Authority/Responsible Party	Description of Changes/Comments
11/13/2019	EAPTELE.001	1	David Lower	Origination
11/14/2019	EAPTELE.001	1	Jennifer Culver, Policy Administrator	Review
12/12/2019	EAPTELE.001	1	David Lower	Operational Review
1/6/2020	EAPTELE.001	1	EAP Quality Committee	Approved by Quorum
1/7/2020	EAPTELE.001	1	David Lower	Operational Approval
12/8/2020	EAPTELE.001	2	Jennifer Culver, Policy Administrator	Annual Review
11/10/2021	EAP.TELE.LOP.001	2	Suzie Sweeney	Operational Review
11/11/2021	EAP.TELE.LOP.001	2	EAP Quality Committee	Committee Approval
12/15/2021	EAP.TELE.LOP.001	2	Suzie Sweeney	Operational Approval
11/2/2022	EAP.TELE.LOP.001	3	Jennifer Drawbaugh, Policy Administrator	Annual Review
11/22/2022	EAP.TELE.LOP.001	3	Suzie Sweeney, Program Director	Operational Review
12/1/2022	EAP.TELE.LOP.001	3	EAP Quality Committee	Approved by Quorum
12/14/2022	EAP.TELE.LOP.001	3	Suzie Sweeney, Program Director	Operational Approval

Employee Assistance Program		<u>Original Effective Date</u>	<u>Business Owner</u>
		January 7, 2020	Suzie Sweeney, Program Director
		<u>LOP #</u>	<u>Last Revision Date</u>
		EAP.TELE.LOP.003	December 8, 2022
	Title:	<u>Last Approval Dates (Up to 3)</u>	<u>Approved By</u>
	Telemental Health: Informed Consent	<ol style="list-style-type: none"> 1. December 8, 2022 2. December 15, 2021 3. January 7, 2020 	Operations
		<u>Regulatory Elements(s)</u>	
		NA	
Approver's Name (Printed): Suzie Sweeney		Title: Program Director	
Approver's Signature: Electronic Signature in C360		Date: 12/8/2022	

1.0 PURPOSE

The purpose of this policy is to outline the Company's informed consent requirements for providing Telemental Health Employee Assistance Program ("EAP") services.

2.0 APPLICABILITY

This policy applies to the Company's Employee Assistance Program ("EAP").

3.0 POLICY

3.1 The Company maintains strict guidelines on Confidentiality and informed consent as they are the foundation of EAP counseling.

3.1.1 At the start of telemental health EAP sessions the Affiliate EAP Clinician will review confidentiality with the Consumer.

3.1.2 The Affiliate EAP Clinicians review will include situations when confidentiality can be broken.

3.1.3 The Affiliate EAP Clinician will review the Company's Statement of Understanding as a means of obtaining their Informed Consent.

3.1.4 Review of Confidentiality and Informed Consent will take place before starting any Telemental Health EAP Sessions.

3.2 Confidentiality

3.2.1 The Company maintains strict guidelines on confidentiality that is in line with all State and Federal laws.

- 3.2.2 The Company and the Affiliate EAP Clinician are not able to release any information (i.e. to family members, employers, or friends) without the Consumer's written consent to do so.
- 3.2.3 When and if safety issues arise during the course of the EAP Telemental Health sessions, in accordance with the law, the Company and/or the Affiliate EAP Clinician may share information to the appropriate parties to ensure the safety of the Consumer.
- 3.2.4 The Company does not need the Consumer's written consent to share their involvement in the following:
 - 3.2.4.1 We learn about child abuse/neglect or abuse/neglect of a vulnerable adult (elder/disabled).
 - 3.2.4.2 It is determined that the Consumer is an immediate threat to self-harm or a physical threat to others.
 - 3.2.4.3 We are ordered by a judge to release our records.
- 3.2.5 If the Company and/or the Affiliate EAP Clinician need to break the Consumer's Confidentiality due to safety concerns or as directed by the court, the Consumer will be advised of the disclosure.

3.3 Informed Consent

- 3.3.1 Before the initiation of Telemental Health EAP sessions, the Affiliate EAP Clinician will obtain the Consumer's "Informed Consent" by reviewing the Company's Statement of Understanding ("SOU") (EAP.OPS.LOP.REF.01).
- 3.3.2 The Company's SOU/Informed Consent covers:
 - 3.3.2.1 Program Overview;
 - 3.3.2.2 Confidentiality;
 - 3.3.2.3 Fees;
 - 3.3.2.4 EAP Services;
 - 3.3.2.5 Referrals.
- 3.3.3 After reviewing the SOU, the Affiliate EAP Clinician will answer any of the Consumer's questions and/or concerns.
- 3.3.4 The Affiliate EAP Clinician will document the review and verbal acceptance of the Consumer's consent in their case record.

3.4 Fees

- 3.4.1 The Consumer will be advised that there are no fees for any of the EAP Services provided by the Company.
- 3.4.2 If the Consumer requires services and/or support beyond the EAP, the Affiliate EAP Clinician will assist them in locating referral resources that are on their health insurance or within their financial means.

3.4.3 While it is the Consumer's responsibility to verify their eligibility before engaging in these services, the Affiliate EAP Clinician will make every effort to connect them to services that are covered by their insurance and/or advise the Consumer of any associated costs.

3.5 EAP Services

3.5.1 All EAP services, regardless of the referral, are voluntary to Consumers and their family members.

3.5.2 While voluntary, some employer referrals require limited information to be released to the employer.

3.5.3 If the Company is to release any information to the employer, the Consumer will need to sign a Release of Information ("ROI") (EAP.TELE.LOP.003.REF.01).

3.6 Referrals

3.6.1 Self-Referrals: A referral when the employee or their family member contacts the EAP on their own behalf to pursue problem resolution.

3.6.2 Formal Referrals: Managers or Human Resources may recommend that a Consumer contact the EAP due to a concern about job performance.

3.6.2.1 This approach monitors the Consumer compliance throughout their involvement with the EAP and compliance is reported to the referring manager.

3.6.2.2 ROIs are required for this communication to take place and no other information is shared.

3.6.3 Mandatory Referrals: Managers or Human Resources may require a Consumer to participate in the EAP due to a policy violation, in lieu of termination.

3.6.3.1 This approach monitors the Consumer's compliance throughout their involvement with the EAP and compliance is reported to the referring manager.

3.6.3.2 As per the Consumer's company policy, and with a signed ROI, the Consumer's compliance with attendance and adhering to the treatment recommendations are reported to the referring manager.

3.6.3.3 For some referrals, the results of drug and alcohol tests may be reported to the referring manager.

3.6.3.3.1 If these results are to be reported, it will be noted on the ROI.

3.7 EAP staff are educated on this policy during initial training as well as during monthly staff meetings, as needed.

4.0 DEFINITIONS

4.1 Affiliate EAP Clinician – means an EAP Company network clinician.

4.2 Company – means Keystone Peer Review Organization, Inc. ("Kepro") and its affiliates.


- 4.3 Confidentiality – means the non-disclosure of private information
- 4.4 Consumer – means a person who is the direct or indirect recipient of services of the Company.
 - 4.4.1 Depending on the context, Consumers may be identified by different names, such as "member," "enrollee," "beneficiary," "patient," "claimant," etc.
 - 4.4.2 A Consumer relationship may exist even in cases where there is not a direct relationship between the Consumer and the Company.
 - 4.4.2.1 For example, if an individual is a member of a health plan that relies on the services of a utilization management organization, then the individual is a Consumer of the utilization management organization.
 - 4.4.3 In the case of a Consumer who is unable to participate in the decision-making process, a family member or other individual legally authorized to make health care decisions on the Consumer's behalf may be a Consumer for the purposes of this policy.
- 4.5 Health Insurance Portability and Accountability Act ("HIPAA") – means the legislation created to improve access to health insurance, protect the privacy of health care information, and promote standardization of electronic health care related records.
- 4.6 Informed Consent – means the communication between the EAP Affiliate Clinician and Consumer prior to starting EAP sessions which the Consumer grants permission to engage in EAP sessions, with full knowledge of what will remain Confidential and what information must be reported
 - 4.6.1 Informed Consent results in the Consumer agreeing to engage in EAP sessions.
- 4.7 Telemental Health – refers to the provision of face-to-face EAP sessions via a secure videoconferencing platform.

5.0 RELATED DOCUMENTATION

- 5.1 Policy Attachments
 - 5.1.1 EAP.OPS.LOP.REF.01 Statement of Understanding
 - 5.1.2 EAP.TELE.LOP.003.REF.01 Release of Information
- 5.2 Related Policies – None
- 5.3 Related Job Aids and Procedures - None

Revision Summary

Review Date	Doc. Id No.	Rev #	Approving Authority/Responsible Party	Description of Changes/Comments
11/13/2019	EAPTELE.003	1	David Lower	Origination
11/14/2019	EAPTELE.003	1	Jennifer Culver, Policy Administrator	Review
12/3/2019	EAPTELE.003	1	David Lower	Operational Review
1/6/2020	EAPTELE.003	1	EAP Quality Committee	Approved by Quorum
1/7/2020	EAPTELE.003	1	David Lower	Operational Approval
12/8/2020	EAPTELE.003	2	Jennifer Culver, Policy Administrator	Annual Review
11/10/2021	EAP.TELE.LOP.003	2	Suzie Sweeney	Operational Review
11/11/2021	EAP.TELE.LOP.003	2	EAP Quality Committee	Committee Approval
12/15/2021	EAP.TELE.LOP.003	2	Suzie Sweeney	Operational Approval
11/2/2022	EAP.TELE.LOP.003	3	Jennifer Drawbaugh, Policy Administrator	Annual Review
11/22/2022	EAP.TELE.LOP.003	3	Suzie Sweeney, Program Director	Operational Review
12/1/2022	EAP.TELE.LOP.003	3	EAP Quality Committee	Approved by Quorum
12/8/2022	EAP.TELE.LOP.003	3	Suzie Sweeney, Program Director	Operational Approval

Employee Assistance Program		<u>Original Effective Date</u> April 27, 2020	<u>Business Owner</u> Suzie Sweeney, Program Director	
		<u>LOP #</u> EAP.TELE.LOP.004	<u>Last Revision Date</u> December 8, 2022	
	Title: Telemental Health: Standard Operating Procedures	<u>Last Approval Dates (Up to 3)</u> 1. December 8, 2022 2. December 15, 2021 3. April 27, 2020	<u>Approved By</u> Operations	
			<u>Regulatory Elements(s)</u> NA	
	Approver's Name (Printed): Suzie Sweeney		Title: Program Director	
	Approver's Signature: Electronic Signature in C360		Date: 12/8/2022	

1.0 PURPOSE

The purpose of this policy is to outline the Company's Standard Operating Procedures for providing Telemental Health Employee Assistance Program ("EAP") services.

2.0 APPLICABILITY

This policy applies to the Company's Employee Assistance Program ("EAP").

3.0 POLICY

3.1 The Company recognizes the importance of Telemental Health in an effort to provide face-to-face counseling.

3.1.1 While Telemental Health sessions should mirror face-to-face sessions as much as possible, there are some nuances to using a virtual platform.

3.1.2 The Company's Affiliate EAP Clinicians will verify the Consumer's identity/location; identify a Consumer support person to be contacted in the event of emergencies; and will have a process in place to manage emergencies in the event that they arise during the course of care.

3.2 EAP Affiliate Clinician and Consumer Identity

3.2.1 At the beginning of Telemental Health EAP sessions, the following will be verified and documented:

3.2.1.1 The name, location, credentials, and license number of the clinician;

3.2.1.2 The name and location of the Consumer;

3.2.1.3 The location of the Consumer during the session;

3.2.1.4 An alternate means of contacting the Consumer in case of technological failure;

3.2.1.5 Immediate contact information (phone, text message, or email) for the clinician;

- 3.2.1.6 Immediate contact information (phone, text message, or email) for the Consumer;
- 3.2.1.7 The identify all individual present and confirmation that they are permitted to hear the Consumer's health information;
- 3.2.1.8 Identification and documentation of a Consumer Support Person ("CSP") who could be contacted in case of an emergency; and
- 3.2.1.9 Expectations about contact between sessions will be discussed and verified with the Consumer.
 - 3.2.1.9.1 This will include a discussion of managing emergencies between sessions.

3.2.2 At the subsequent Telemental Health EAP sessions, the following will be verified and documented:

- 3.2.2.1 The name and location of the clinician;
- 3.2.2.2 The name an location of the Consumer; and
- 3.2.2.3 The identify all individual present and confirm that they are permitted to hear the Consumer's health information.

3.3 Informed Consent

- 3.3.1 Before the initiation of Telemental Health EAP sessions, the Affiliate Clinician will obtain the Consumer's "Informed Consent" by reviewing the Company's Statement of Understanding ("SOU").
- 3.3.2 After reviewing the SOU, the EAP Affiliate Clinician will answer any of the Consumer's questions and or concerns.
- 3.3.3 Upon obtaining the Consumer's informed consent to patriate, the clinician and Consumer will electronically sign the SOU.
- 3.3.4 The EAP Affiliate Clinician will document the review and acceptance of the Consumer's consent in their case record.

3.4 Emergencies

- 3.4.1 EAP Affiliate Clinicians will maintain both technical and clinical competence in the management of emergencies.
- 3.4.2 EAP Affiliate Clinicians will discuss with the Consumer the importance of having consistency in where the Consumer is located for their sessions and knowing their location at the time of the EAP session.
 - 3.4.2.1 Knowing this information impacts emergency management and local available resources.
- 3.4.3 If the Consumer's location changes, the clinician will be aware of the impact of the location on the emergency management protocols.

- 3.4.4 When risk issues arise in the case, the EAP Affiliate Clinician will engage in safety planning with the Consumer. If the Consumer is unable to maintain their safety, the clinician will:
 - 3.4.4.1 Place a call out during the Telemental Health session to the callers Consumer Support Person
 - 3.4.4.1.1 If the Consumer Support Person is not available, the clinician will call local emergency services for assistance
 - 3.4.4.2 Upon connecting with the Consumer Support Person or local emergency services, the clinician will advise on the risk issues and work with them to assist the Consumer to the nearest emergency room for evaluation.
 - 3.4.4.3 The EAP Affiliate Clinician will follow up (Consumer Support Person, local emergency services, and/or the emergency room to ensure that the Consumer was safely transported and seen for an evaluation.

3.5 Standards of Care

- 3.5.1 Telemental Health Clinicians will uphold the same standards of practice (i.e. comprehensive assessment, documentation, and care coordination) for virtual sessions as they would for in-person sessions.

- 3.6 EAP staff is educated on this policy during initial training as well as during monthly staff meetings, as needed.

4.0 DEFINITIONS

- 4.1 Affiliate EAP Clinician – means an EAP Company network clinician.
- 4.2 Company – means Keystone Peer Review Organization, Inc. (“Kepro”) and its affiliates.
- 4.3 Consumer – means a person who is the direct or indirect recipient of services of the Company.
 - 4.3.1 Depending on the context, Consumers may be identified by different names, such as "member," "enrollee," "beneficiary," "patient," "claimant," etc.
 - 4.3.2 A Consumer relationship may exist even in cases where there is not a direct relationship between the Consumer and the Company.
 - 4.3.2.1 For example, if an individual is a member of a health plan that relies on the services of a utilization management organization, then the individual is a Consumer of the utilization management organization.
 - 4.3.3 In the case of a Consumer who is unable to participate in the decision-making process, a family member or other individual legally authorized to make health care decisions on the Consumer’s behalf may be a Consumer for the purposes of this policy.
- 4.4 Consumer Support Person – refers to a family member, friend, or community member who is identified by the Consumer and could be called upon for support in the case of an emergency.

4.5 Health Insurance Portability and Accountability Act (“HIPAA”) – means the legislation created to improve access to health insurance, protect the privacy of health care information, and promote standardization of electronic health care related records.

4.6 Informed Consent – means the communication between the EAP Affiliate Clinician and Consumer prior to starting EAP sessions which the Consumer grants permission to engage in EAP sessions, with full knowledge of what will remain Confidential and what information must be reported

4.6.1 Informed Consent results in the Consumer agreeing to engage in EAP sessions.

4.7 Telemental Health – refer to the provision of face-to-face EAP sessions via a secure videoconferencing platform

5.0 RELATED DOCUMENTATION

5.1 Policy Attachments – None

5.2 Related Policies

5.2.1 COMP.037 Verifying Consumers’ Identities

5.3 Related Job Aids and Procedures – None

Revision Summary

Review Date	Doc. Id No.	Rev #	Approving Authority/Responsible Party	Description of Changes/Comments
12/24/2019	EAPTELE.004	1	David Lower	Origination
12/30/2019	EAPTELE.004	1	Jennifer Culver, Policy Administrator	Review
1/2/2020	EAPTELE.004	1	David Lower	Operational Review
1/22/2020	EAPTELE.004	1	EAP Quality Committee	Approved by Quorum
4/27/2020	EAPTELE.004	1	David Lower	Operational Approval
3/29/2021	EAP.TELE.LOP.004	2	Jennifer Drawbaugh, Policy Administrator	Annual Review and Change to Numbering
11/10/2021	EAP.TELE.LOP.004	2	Suzie Sweeney	Operational Review
11/11/2021	EAP.TELE.LOP.004	2	EAP Quality Committee	Committee Approval
12/15/2021	EAP.TELE.LOP.004	2	Suzie Sweeney	Operational Approval

11/1/2022	EAP.TELE.LOP.004	3	Jennifer Drawbaugh, Policy Administrator	Annual Review
11/22/2022	EAP.TELE.LOP.004	3	Suzie Sweeney, Program Director	Operational Review
12/1/2022	EAP.TELE.LOP.004	3	EAP Quality Committee	Approved by Quorum
12/8/2022	EAP.TELE.LOP.004	3	Suzie Sweeney, Program Director	Operational Approval