

GUIDELINES FOR INITIAL SESSION (Inclusive of HIPAA Requirements)

Initial Session with Client:

1. Give client a copy of the “Summary of EAP Practice Notice”. Tell client that HIPAA (Health Insurance Portability and Accountability Act) is a Federal law that helps protect the privacy of their health care information. It reinforces what we have always done as Counseling Professionals to protect the privacy of our EAP clients.
2. Have client sign the Statement of Understanding (**Return to Comprehensive EAP**)
3. Complete the Intake Form (**Returned to Comprehensive EAP**)
4. Complete as appropriate the Consent for the Release of Information (see below).
Any information to be communicated with client’s company must be done through Comprehensive EAP.

Phone Sessions with Client:

If you speak initially with clients over the phone, offer to send them “Summary of EAP Practice Notice” or if they prefer, refer them to our web site (www.compeap.com) for a copy of the “Protected Health Information – Full Notice”.

Additional Information on Privacy:

The purpose of the “Protected Health Information – Full Notice” is to inform clients that information may be shared with other professional counselors so that their health care can be better managed and that the client’s authorization must be given in writing for purposes other than treatment, payment, or health care management.

You must complete and have the client sign the Consent for the Release of Information Form before information can be shared beyond referral and follow-up data for treatment, payment and health care management. For example, consent would be required before information can be shared with managers, spouses, etc.

Psychotherapy notes (sometimes referred to as process notes) should be kept separate from the client’s record. These are notes documenting or analyzing the contents of a conversation with the client or a counseling session. For most of our clients, we will not have psychotherapy notes; however, for those clients with which we have a long-term relationship we may have notes that should be kept separate from their EAP record. These notes receive higher protection under the law and must be located in a locked file cabinet (All data on clients must be secured and available only to authorized staff).