



1625 North Market Blvd., Suite S-200 Sacramento, CA 95834 (916) 574-7830, (916) 574-8625 Fax www.bbs.ca.gov

| Subject: | Review of Online-Only Therapy Platform Survey Results | | | |
|----------|---|-------|--------------|--|
| From: | Rosanne Helms Legislative Manager | | | |
| То: | Committee Members | Date: | May 25, 2023 | |

<u>Overview</u>

The increasing use of online-only therapy platforms and alternative methods of therapy such as apps, email, and texting raise the question of whether these methods pose any new public protection concerns that the Board needs to address.

The Telehealth Committee (Committee) discussed these issues at its December 8, 2022 and March 16, 2023 meetings. At the March meeting, the Committee reviewed and approved a survey for licensees and registrants who have experience working for one of these platforms, in order to gain more information about their experiences.

The survey was open from April 10 through May 15, 2023. The Board utilized its social media, email subscriber lists, and also sought the help of its professional organization stakeholders in order to distribute the survey.

The survey received over 1,700 responses. Below is a question-by-question summary of the results. The full results for multiple-choice questions are shown in **Attachment A.** Responses to open-ended questions are summarized below.

- 1. Please indicate your license or registration type Most of the survey respondents were LMFTs (47%). LCSWs comprised 28% of respondents, and 8% were LPCCs. Associates (a mix of all 3 types) were 15%.
- **2.** Have you worked for or contracted with an online-only therapy platform? 77% had, 23% had not. The survey ended here for those who had not.
- 3. When did you last work for or contract with an online-only therapy platform?

Most respondents are actively working for one of these platforms or have done so very recently. 60% of respondents indicated they currently work for a platform. 22% indicated it had been one year ago or less.

4. Which online-only therapy platforms have you worked for or contracted with?

BetterHelp was the most common response, with 28% of respondents (292 individuals). The next most common were Talkspace (10%, or 98 individuals), and Cerebral (6%, or 59 individuals.)

However, 70% of respondents selected the "Other" category (724 individuals), which prompted them to indicate the platform they were working for. There were a wide variety of responses, but overwhelmingly the most common indicated for the "Other" category was Path, with 24% of the "Other" category respondents reporting working there (172 individuals).

5. How many hours, on average, did you work for or contract with the onlineonly therapy platform?

Most reported part-time work here, with 43% working 0-10 hours per week, 27% reporting 11-20 hours worked per week, and 30% reporting working more than 20 hours per week for these platforms.

6. How many clients, on average, did you see per week working for or contracting with the online-only therapy platform?

This is fairly evenly split, with around 20-25% of respondents indicating a client number in each of the following categories: 0-5 clients per week; 6-10 clients per week, 11-20 clients per week, and 21-30 clients per week.

7. Were you considered an employee (issued a W-2), or an independent contractor (issued a 1099)?

The majority of respondents (67%) report being classified as an independent contractor for these platforms, while 26% report being a W-2 employee.

Was this primary employment, or supplemental employment?
 43% indicated primary employment; 57% indicated supplemental employment.

9. Please explain how you were paid and your pay rate. (This was optional.)

This question generated a wide variety of answers, but a typical pay rate seems to be between \$50-80 per hour. However, that range varied from as low as \$20-\$30 per hour for some, to over \$100 per hour for others. Below is a sampling of responses:

- \$83 per intake \$70 per session \$50 for no show clients
- I have worked there since 2019. Initially, I had many more clients and was working up to 25 hours a week. The pay is very minimal and definitely not worth it with the type of clients served and limitations in not being able to <u>decline refe</u>rrals if they weren't a good fit
- pays \$63 per 45 minute session. They pay monthly. I'm an independent contractor. I average about \$4000/month. I worked for from about May 2020 to April 2021. The hourly rate increased the more hours you work. They strongly encouraged communicating with

clients through their messaging platform and they had a formula to pay by word. Both how many words the client wrote and how many the therapist wrote in response. For video or phone sessions, the breakdown was something like: For the first 1-5 hours = \$25/hr For the next 5-10 hours = \$30/hr For the next 11-15 hours = \$35/hr etc. It keeps going, with \$60/hr the highest rate for over 35 hours. At one point I had 18 clients and the most I ever grossed was about \$1600 a month.

- Paid via direct deposit weekly or biweekly. Paid per session at flat rate for
 paid contracted insurance rate per CPT code for
 Rate between \$80-\$139 per session
- Paid via direct deposit pay rate, less than 5 clients \$30, 45 minutes between 5-10 client, \$45,45 minutes 10 or or more 50, 45 minutes, and so and so
- Paychecks (auto deposits) were issued every other week. Hourly pay was based on the number clients from \$30/hr and up
- I am being paid every two weeks, \$80 per session for (60 minute) there are a couple other pay scales for different amount of times session goes. I am a 1099
- At first it was a percentage of what the client paid for services. Later it became per word for chat therapy and per minute for video or phone sessions. It started to feel like I was chasing the dollar and the word/minute to get paid and not fully focusing on the client, which is why I stopped.
- I am paid a salary of 84,000 with quarterly bonuses based on the amount of clients of up to \$5,000
- Each weekly hour is paid as per the corresponding earnings tiers. The earnings tiers range from \$30 to \$70/hr Weekly hours between 0-5h are paid at \$30/hr Weekly hours between 5-10h are paid at \$35/hr Weekly hours between 10-15h are paid at \$40/hr Weekly hours between 15-20h are paid at \$45/hr Weekly hours between 20-25h are paid at \$50/hr Weekly hours between 25-30h are paid at \$55/hr Weekly hours between 30-35h are paid at \$60/hr Weekly hours beyond 35h are paid at \$70/hr
- \$50/hr for each 90834 session plus 2 administrative hours per week. Basically, I only was paid for time performing the therapy sessions, plus 2 hrs admin time and 1 hr team meetings per week. I had many hours of unpaid documentation time.
- **10. Did the platform provide you with any type of bonus or incentive structure?** 61% indicated no, and 38% indicated yes.
- **11. Please explain the bonus or incentive structure the platform used.**

Those indicating an incentive structure noted a number of incentives, including: increase in salary the more clients seen; sign-up bonuses, gifting of company stock; bonus for referring other therapists to the platform; bonus for obtaining a license in a high-need state; payment incentives at times the demand for therapists was high; incentives for working in prime hours such as evenings and weekends; client longevity bonuses; and free CE access.

12. Did the platform ever match you to clients in states where you are not licensed?

The majority (82%) indicated they were not ever matched to clients in states where they were not licensed. However, 18% indicated that they were.

13. Did the platform provide you with any instructions regarding treating clients located in states where you are not licensed? If so, please describe. A large number of responses indicated that no instructions were provided. However, many reported being instructed that practice in a state where not licensed was not allowed, and to have any incorrectly matched out-of-state clients re-referred. Many noted that they had the ability to decline a client if they were out-of-state. Some indicated they were told it was their responsibility to know each state's requirements for practice in that state.

A few responses did indicate they were asked to see clients out of their license jurisdiction, or told it was ok briefly for continuity of care if a client was travelling. A couple responses mentioned that they were allowed to accept international clients.

14. Did the platform provide you with a way to verify the client's legal name (versus allowing the client to be anonymous, use a pseudonym, etc.)? Roughly half of respondents answered "yes", and half "no" on this question.

15. Please explain how the client's legal name was verified.

In most cases respondents indicated the client was required to upload a photo ID into the system, and also provide an insurance card. Some also indicated that they asked the client to confirm their name, their date of birth, and/or asked the client to hold up their photo ID on camera. Some indicated that their platform identified their client's full name in the system, and also provided a space where the client could indicate their preferred name.

16. Did the platform provide you with a way to verify the location of the client? Approximately half of respondents indicated yes, and half indicated no.

17. How were you able to verify the location of the client?

The majority of respondents stated that they have the client verify their location verbally. A smaller number indicated that the platform required them to type in their location prior to a session.

A few respondents indicated that their platform's software had a feature where they could see the location of the IP address, or that there was an "emergency" button they could click to obtain the client's location in an emergency.

18. Did the platform share information with you regarding how they collect and store client health information?

Approximately half indicated yes, and half indicated no.

19. If yes, please explain.

Many respondents indicated that their platform utilized an electronic health record (EHR) system. Many others referenced use of a HIPAA-compliant platform. Several also noted that their platform provided some type of instructions, training, or a manual.

20. How was the client informed consent agreement handled when you worked for, or contracted with, the online-only therapy platform?

A majority (70%) indicated the platform handled the informed consent agreement and maintained it as part of the client's records. 19% indicated that they handled the informed consent agreement and maintained it.

In the comments, several respondents indicated that they also did this themselves, even though the platform did as well.

21. Who served as the custodian of record for client health information and records when you were working for or contracting with the online-only therapy platform?

65% indicted the online-only therapy platform served as the custodian of record. Only 17% indicated they served as custodian of record.

In the notes, several therapists indicated that even though the company was the custodian of record, they also kept their own files for their records.

22. How did the online-only therapy platform communicate its privacy policy and data sharing practices to your clients?

Most indicated that these were delivered in writing by the company to the client, prior to beginning services (56%). However, 29% indicated that they did not know how this information was communicated to clients.

- 23. Were your clients generally familiar and comfortable with the online-only therapy platform's privacy policy and data sharing practices? 83% indicated yes, and 17% indicated no.
- 24. Were there any concerns that your clients commonly expressed to you regarding the online-only therapy platform's privacy policy and data sharing practices? Please explain.

The vast majority of respondents to this question indicated there were no concerns.

A sampling of concerns and comments are as follows:

- My clients did not voice a concern. I think I worked primarily with Millennials and Gen X&Z. They were much more open to this style of Therapy.
- They could not get the information from the company
- No, the clients appear to like that platform. It is convenient and saves them time.

- Yes. I don't think they knew about the privacy practices, and I would get questions about it.
- There were many concerns with how their personal and private information was being shared with third parties
- None. The concerns were mostly cost-related/pricing.
- Occasionally, however most clients did not consider this or share much concern. I probably had 2 clients (one a therapist herself, and another that wanted to get off the platform as soon as possible). As I continued to work on the platform, I began to become less comfortable after certain situations that transpired. I emailed the company and they did not directly answer my questions.
- There were concerns about the safety of their data, they also experienced a lot of frustration around the way they were receiving targeted ads on social media after signing up to work with the platform.
- **25. Did the platform have a clear emergency plan in place for clients in crisis?** 60% responded yes; 40% responded no.

26. Please briefly summarize the emergency plan.

Below is a sampling of answers:

- Crisis team in place for emergencies with a protocol for therapists to follow
- Emergency resources provided for each county they serve in CA (spread sheet available to all clinicians). Clinical staff are available for consultation by phone or on secured chat
- Contact platform director to discuss case and need for 5150, or 911 call
- They had a brief training on their crisis procedure. Basically the therapist would have access to the crisis team who was able to contact local emergency services (911, pmrt, etc) the client based on their location (also could cancel the therapist's other clients while on a crisis call). Then I'd they were contacted we would work with the crisis team to stay on the line with client until help arrived. Afterwards we were to write up a report about the crisis and submit to the clients file.
- Clients were required to contact 911. The platform stated they were not a crisis facility and clients were to be referred to a crisis line, emergency contact.
- There was a button on each client's platform where therapists could request help with a client and platform would provide full name, address, phone, and, contact person for the client.
- List of phone numbers on safety plan
- Each client required to complete a safety plan in initial session with Therapist. Saved electronically
- Client notified if emergency please call 911 or go to nearest emergency room. Client also provided information of National Suicide Prevention Line and also Text Crisis Line numbers.

27. What methods did you use to provide psychotherapy services to clients when working for or contracting with the platform? Please check all that apply.

The majority reported use of videoconferencing therapy (97%). 49% reported use of the telephone (49%), online without video (27%), and online chat (26%). Texting was used by 11%.

28. What method did you primarily use to provide psychotherapy services to clients when working for or contracting with the platform?

Videoconference was the most common primary method of therapy reported (92%), with the next most common primary method being online chat (3%) and telephone (2%).

29. Did you ever use texting to provide therapy to your clients when working for or contracting with the platform?

18% of respondents to this question indicated that they sometimes used texting to provide therapy, while 82% of respondents indicated that they did not use texting.

30. Please explain how you integrated texting into therapy with your clients.

Below is a sampling of answers:

- Answering questions between sessions, providing reminders, giving referrals to resources, sending prompts and worksheets, etc.
- It was used more to review coping skills and validation
- I was forced to use texting. I don't know how to do therapy through texting.
- Would use texting to explain consent, frame, introduce myself. I would also use it to schedule appointments. I did not use it to conduct actual therapy but the platform encouraged us to use it as therapy.
- It was challenging because I couldn't determine tone. I asked for a lot of clarification which seemed to frustrate clients
- I didn't use texting as a therapy session however we were required by the platform to respond to all text messages within a set time frame a clients would often share therapy information there.
- Used minimal to remind client of current session. Never used terms referring to therapy. Only sent texts to clients who signed a release agreement to receive texts. Most clients prefer texts over phone messages or emails. Messages are sent from secure SMS
- You had to use the platforms texting box specifically for chat/text therapy if the client requested text therapy.
- I had some clients who could only have confidentiality if we could text
- Texting was not only used for therapy but it was expected for therapists 24/7 to be available for clients via text.
- I would explain that they can share anything non-emergency via text between sessions, and would text back 1-3 days later

31. Please explain the procedure for verifying client's identity when providing therapy via texting with them.

Many indicated the texting took place through the platform, and that the client would need to be logged in. Others indicated that there is no standard procedure to confirm when providing texting, or no complete way of verifying it is the actual person, other than asking them or asking for a password or date of birth, or recognizing their phone number.

32. Where were you primarily located when you provided therapy services on this platform?

92% indicated that they were in a home office, and 7% indicated that they were in a business office while providing services on the platform.

33. What confidentiality measures were taken to mitigate for the separate location of the therapist and the client?

Below is a sample of answers:

- Discussing with client importance of privacy. Asking if they were in a private setting, therapist ensured to be alone in home office.
- Private office space in home alone. Records of sessions kept by me daily, using only 1st name (only have 1st names), save weekly session calendar, notes taken by me kept in secure location and only discussed with my clinical supervisor, if shared at all.
- In a room with no other people with a closed door with a lock. Also had noise making machine to drown out any other sounds (train, neighbors, etc.)
- Each session I explained to my clients that our sessions are confidential and they needed to be in an area alone and use of headphones. I asked if they were at home or elsewhere.

34. Did you experience any advantages to working for or contracting with an online-only therapy platform, versus working on your own or for a company with a physical site?

A wide range of advantages were cited. Some of the common ones were as follows:

- The platform handles the administrative tasks such as: marketing, insurance billing, appointment reminders, leaving more time to focus on providing therapy.
- The convenience of working remotely
- No commute
- No office rent
- Less business overhead costs
- Flexible schedule
- Being able to provide access to therapy to more populations
- Ability to see clients all over the state, instead of in just one geographic area

- Fewer client cancellations, clients are more often on-time
- The platform provided a fuller caseload/referrals

35. Please describe any problems you encountered when working for or contracting with the online-only therapy platform.

Many cited no issues, while many others cited low pay and technology interruptions. Here is a sampling of comments:

- Poor direct communication by phone when technical problems arrive. Lack of therapist involvement in Platform development and changes is frustrating when changes make clinicians work harder vs. improving problems. Lack of knowledge or appreciation of professionals providing services. Money collection brokers vs providers of a clinical MH service.
- Not knowing for sure if the patient is alone, not knowing for sure what the patient it doing when moving out of my sight sitting in front of the camera.
- Getting updates when the agency changed procedures.
- Internet outages. Slightly Reduced engagement of clients
- Lack of transparency about client fees
- There was limited support and felt the pay was low
- They seem to do more with client data than they lead on, but I don't have proof. One major disadvantage is that they treat contractors like employees and thereby breaking CA laws, but refusing to change our contract when asked. If we want to stay in network with them, we have to abide by their rules. They have the upper hand because they pay more than insurance but have since become the middle man between therapist and private insurance. The client and the therapist are at the mercy of these companies.
- Clients not wanting to be recorded, fatigue from being on the screen a long time, technical difficulties, being told to refer low need clients to coaches instead of licensed therapists
- Poor pay, unrealistic expectations of availability of therapists due to advertising by online platform, inappropriate client referrals for an online platform
- 36. Do you have any other comments or concerns you would like to share related to your experience working for or contracting with an online-only therapy platform?

Several therapists commented that they had tried working for some of these platforms, and that some were well run and felt secure and ethical, while others did not appear to be.

Below is a sampling of comments:

 I think that we need online services to be treated as important as in office services. We have too many treatment deserts where people would have to drive hours or be on wait lists for months to get seen. It's just as effective and should remain reimbursed as if it were in person because we provide life saving treatment for people who have never been able to access therapy service before. You break the stigma and they don't have to be afraid to walk into a therapy center

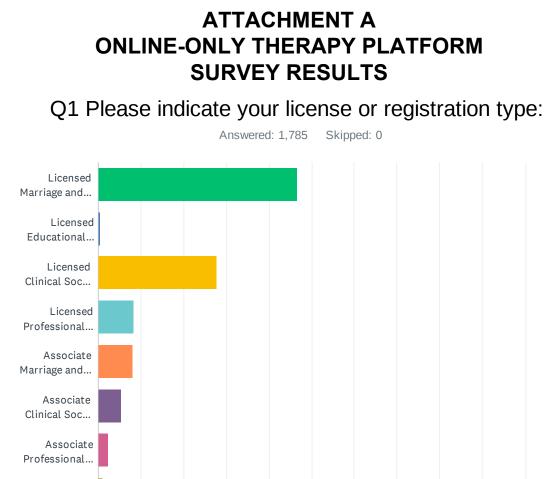
- I think clients who would not otherwise seek therapy are getting services. It is good for me and good for my clients in many ways with regard to access. But they need to operate more ethically and not as tech businesses. They need to understand and be required to know and support legal and ethical guidelines. It can be a hard balance for an ethical therapist such as myself.
- I'm concerned that insurance companies are moving away from contracting with individual therapist and replacing with therapy platform services. **Insurance** has not contracted with private therapist for 5 years in Ventura County. They will on occasion do a single case agreement once a member pushes and has waited for an unreasonable amount of time to get therapy.
- I think online platforms do have a great purpose for clients especially those who prefer it to in person. Though I do know there are many out there that aren't always following the letter of the law which may make ones that are suspect as well. I feel therapists need to do their due diligence in looking for the right company if they do seek to do online therapy.
- I love being accessible to individuals that need care. I think these portals do a good job connecting a client and therapist, but they do take advantage of both parties- they charge the client too much and underpay the therapist.
- Online therapy is a wonderful option for provider and client. It gives more access and accommodation for those who otherwise would not be able to attend in person therapy. I feel safer working remote as a female provider.
- Please come out with specific guidelines that deal with the grey areas of these platforms. It's hard to advocate for clarity without having solid documentation to point towards

Recommendation

Conduct an open discussion regarding the survey results shown in **Attachment A**, and determine any next steps the Committee wishes to take regarding this topic.

Attachments

Attachment A: Online-Only Therapy Platform Survey Results



Other (please specify)

0%

10%

20%

30%

40%

50%

60%

70%

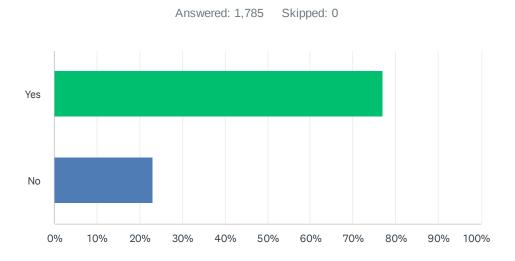
80%

90%

100%

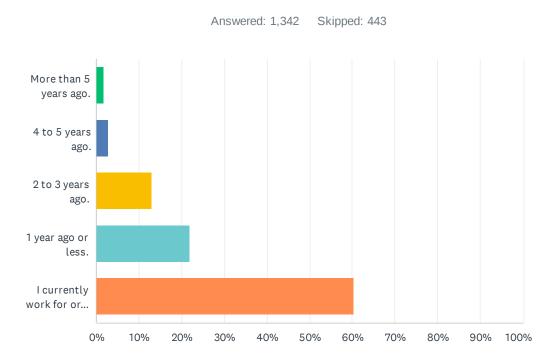
| ANSWER CHOICES | RESPONSES | |
|---|-----------|-------|
| Licensed Marriage and Family Therapist | 46.67% | 833 |
| Licensed Educational Psychologist | 0.34% | 6 |
| Licensed Clinical Social Worker | 27.79% | 496 |
| Licensed Professional Clinical Counselor | 8.35% | 149 |
| Associate Marriage and Family Therapist | 8.12% | 145 |
| Associate Clinical Social Worker | 5.32% | 95 |
| Associate Professional Clinical Counselor | 2.30% | 41 |
| Other (please specify) | 1.12% | 20 |
| TOTAL | | 1,785 |

Q2 Have you worked for or contracted with an online-only therapy platform?



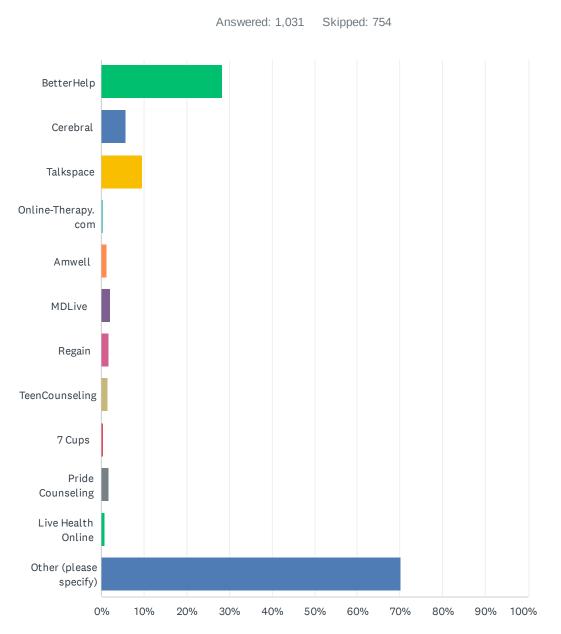
| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-------|
| Yes | 76.97% | 1,374 |
| No | 23.03% | 411 |
| TOTAL | | 1,785 |

Q3 When did you last work for or contract with an online-only therapy platform?



| ANSWER CHOICES | RESPONSES | |
|--|-----------|-------|
| More than 5 years ago. | 1.79% | 24 |
| 4 to 5 years ago. | 2.83% | 38 |
| 2 to 3 years ago. | 13.04% | 175 |
| 1 year ago or less. | 21.91% | 294 |
| I currently work for or contract with an online-only therapy platform. | 60.43% | 811 |
| TOTAL | | 1,342 |

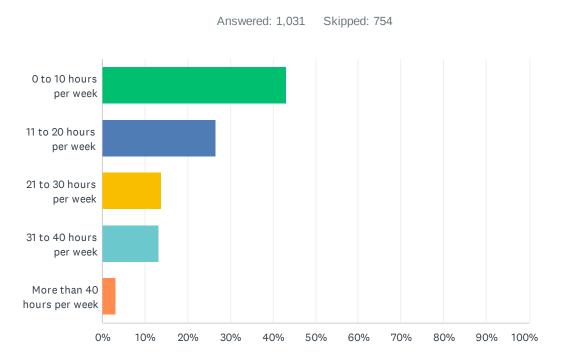
Q4 Which online-only therapy platforms have you worked for or contracted with: (Select all that apply)



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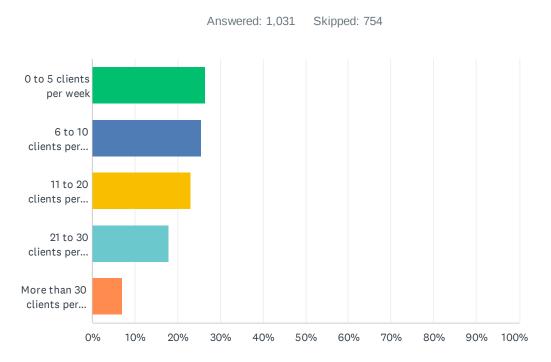
| ANSWER CHOICES | RESPONSES | |
|--------------------------|-----------|-----|
| BetterHelp | 28.32% | 292 |
| Cerebral | 5.72% | 59 |
| Talkspace | 9.51% | 98 |
| Online-Therapy.com | 0.39% | 4 |
| Amwell | 1.36% | 14 |
| MDLive | 2.04% | 21 |
| Regain | 1.65% | 17 |
| TeenCounseling | 1.55% | 16 |
| 7 Cups | 0.48% | 5 |
| Pride Counseling | 1.75% | 18 |
| Live Health Online | 0.78% | 8 |
| Other (please specify) | 70.22% | 724 |
| Total Respondents: 1,031 | | |

Q5 How many hours, on average, did you work for or contract with the online-only therapy platform?



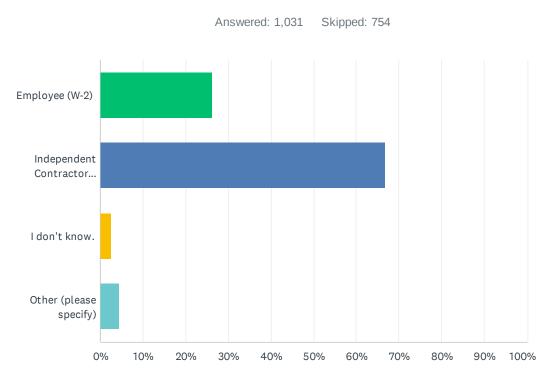
| ANSWER CHOICES | RESPONSES |
|-----------------------------|------------|
| 0 to 10 hours per week | 42.97% 443 |
| 11 to 20 hours per week | 26.67% 275 |
| 21 to 30 hours per week | 13.87% 143 |
| 31 to 40 hours per week | 13.19% 136 |
| More than 40 hours per week | 3.30% 34 |
| TOTAL | 1,031 |

Q6 How many clients, on average, did you see per week working for or contracting with the online-only therapy platform?



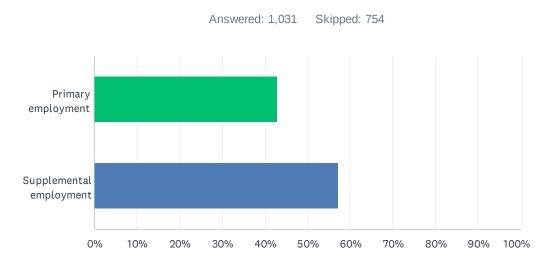
| ANSWER CHOICES | RESPONSES |
|-------------------------------|------------|
| 0 to 5 clients per week | 26.48% 273 |
| 6 to 10 clients per week | 25.51% 263 |
| 11 to 20 clients per week | 23.08% 238 |
| 21 to 30 clients per week | 17.94% 185 |
| More than 30 clients per week | 6.98% 72 |
| TOTAL | 1,031 |

Q7 Were you considered an employee (issued a W-2), or an independent contractor (issued a 1099)?



| ANSWER CHOICES | RESPONSES |
|-------------------------------|------------|
| Employee (W-2) | 26.29% 271 |
| Independent Contractor (1099) | 66.63% 687 |
| I don't know. | 2.62% 27 |
| Other (please specify) | 4.46% 46 |
| TOTAL | 1,031 |

Q8 Was this primary employment, or supplemental employment?

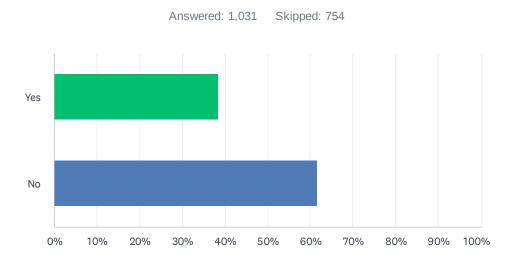


| ANSWER CHOICES | RESPONSES | |
|-------------------------|-----------|-------|
| Primary employment | 42.77% | 441 |
| Supplemental employment | 57.23% | 590 |
| TOTAL | | 1,031 |

Q9 Please explain how you were paid and your pay rate. (This is optional.)

Answered: 746 Skipped: 1,039

Q10 Did the platform provide you with any type of bonus or incentive structure?

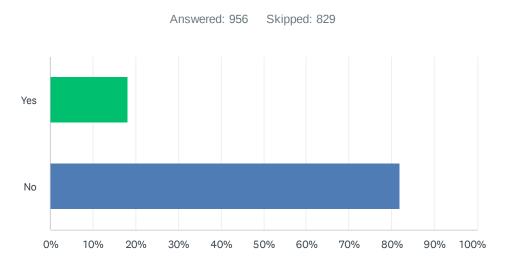


| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-------|
| Yes | 38.41% | 396 |
| No | 61.59% | 635 |
| TOTAL | | 1,031 |

Q11 Please explain the bonus or incentive structure the platform used.

Answered: 320 Skipped: 1,465

Q12 Did the platform ever match you to clients in states where you are not licensed?

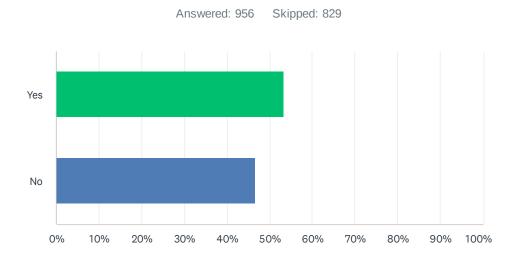


| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 18.20% | 174 |
| No | 81.80% | 782 |
| TOTAL | | 956 |

Q13 Did the platform provide you with any instructions regarding treating clients located in states where you are not licensed? If so, please describe.

Answered: 809 Skipped: 976

Q14 Did the platform provide you with a way to verify the client's legal name (versus allowing the client to be anonymous, use a pseudonym, etc)?

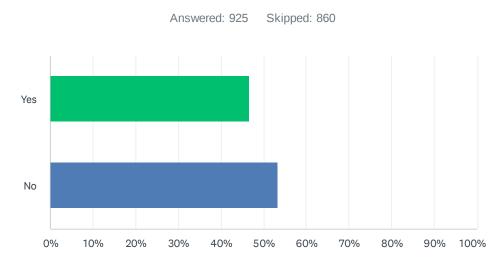


| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 53.24% | 509 |
| No | 46.76% | 447 |
| TOTAL | | 956 |

Q15 Please explain how the client's legal name was verified.

Answered: 439 Skipped: 1,346

Q16 Did the platform provide you with a way to verify the location of the client?

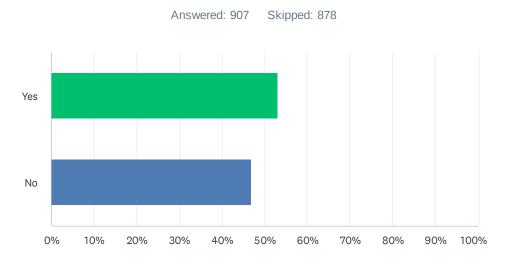


| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 46.59% | 431 |
| No | 53.41% | 494 |
| TOTAL | | 925 |

Q17 How were you able to verify the location of the client?

Answered: 389 Skipped: 1,396

Q18 Did the platform share information with you regarding how they collect and store client health information?



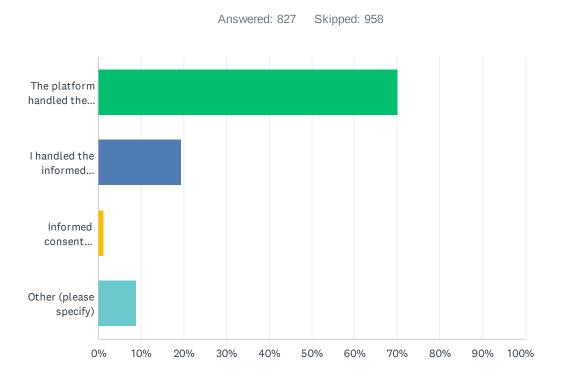
| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 53.14% | 482 |
| No | 46.86% | 425 |
| TOTAL | | 907 |

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Q19 If yes, please explain.

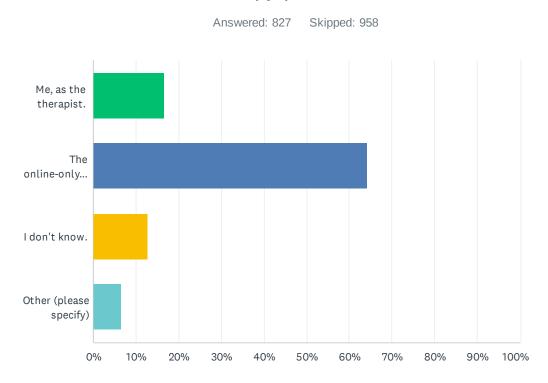
Answered: 377 Skipped: 1,408

Q20 How was the client informed consent agreement handled when you worked for, or contracted with, the online-only therapy platform?



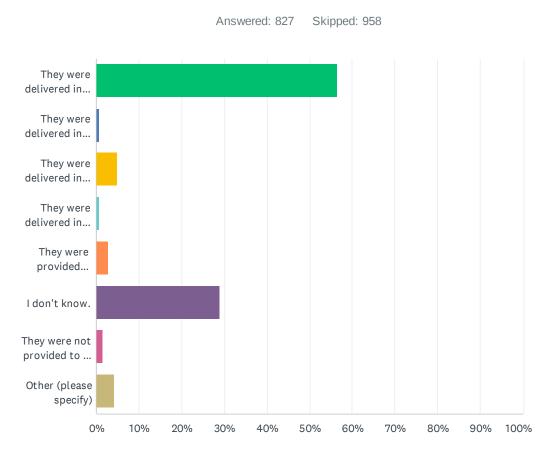
| ANSWER CHOICES | RESPONS | ES |
|--|---------|-----|
| The platform handled the informed consent agreement and maintained it as part of the client's records. | 70.25% | 581 |
| I handled the informed consent agreement and maintained it as part of the client's records. | 19.47% | 161 |
| Informed consent agreements were not done. | 1.33% | 11 |
| Other (please specify) | 8.95% | 74 |
| TOTAL | | 827 |

Q21 Who served as the custodian of record for client health information and records when you were working for or contracting with the online-only therapy platform?



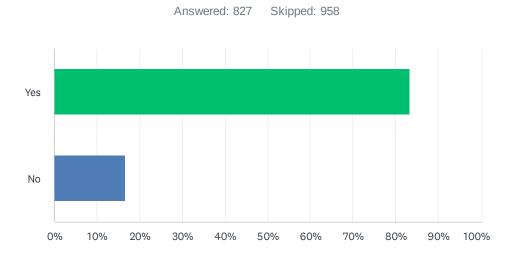
| ANSWER CHOICES | RESPONSES | |
|-----------------------------------|-----------|-----|
| Me, as the therapist. | 16.69% | 138 |
| The online-only therapy platform. | 64.09% | 530 |
| I don't know. | 12.70% | 105 |
| Other (please specify) | 6.53% | 54 |
| TOTAL | | 827 |

Q22 How did the online-only therapy platform communicate its privacy policy and data sharing practices to your clients?



| ANSWER CHOICES | RESPONSES | 5 |
|---|-----------|-----|
| They were delivered in writing by the company to the client, prior to beginning services. | 56.47% | 467 |
| They were delivered in writing by the company to the client, upon the client's request. | 0.60% | 5 |
| They were delivered in writing by the therapist to the client, prior to beginning services. | 4.84% | 40 |
| They were delivered in writing by the therapist to the client, upon the client's request. | 0.60% | 5 |
| They were provided verbally by the therapist to the client, prior to beginning services. | 2.78% | 23 |
| I don't know. | 28.90% | 239 |
| They were not provided to the client. | 1.57% | 13 |
| Other (please specify) | 4.23% | 35 |
| TOTAL | | 827 |

Q23 Were your clients generally familiar and comfortable with the onlineonly therapy platform's privacy policy and data sharing practices?

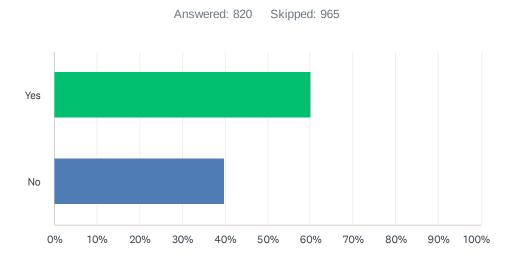


| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 83.43% | 690 |
| No | 16.57% | 137 |
| TOTAL | | 827 |

Q24 Were there any concerns that your clients commonly expressed to you regarding the online-only therapy platform's privacy policy and data sharing practices? Please explain.

Answered: 671 Skipped: 1,114

Q25 Did the platform have a clear emergency plan in place for clients in crisis?

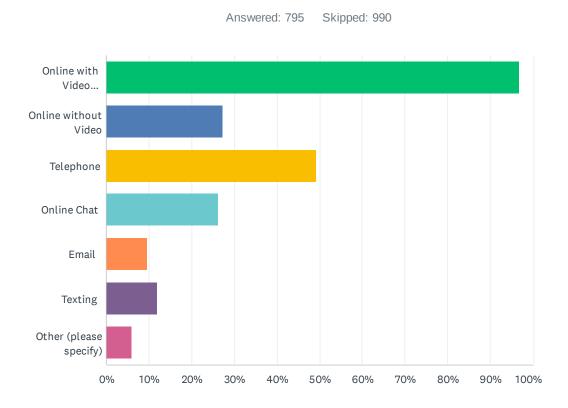


| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 60.12% | 493 |
| No | 39.88% | 327 |
| TOTAL | | 820 |

Q26 Please briefly summarize the emergency plan.

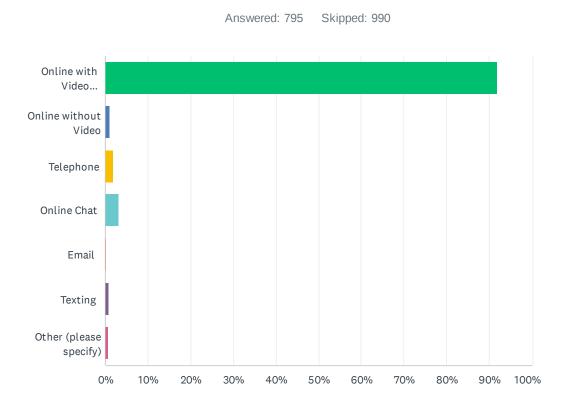
Answered: 417 Skipped: 1,368

Q27 What methods did you use to provide psychotherapy services to clients when working for or contracting with the platform? Please check all that apply.



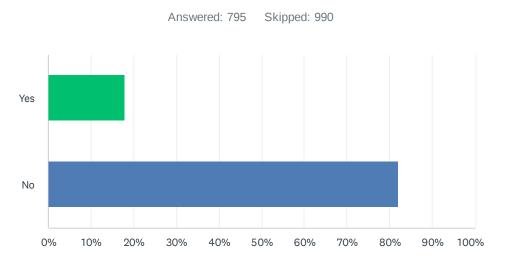
| ANSWER CHOICES | RESPONSES | |
|---------------------------------------|-----------|-----|
| Online with Video (Videoconferencing) | 96.86% | 770 |
| Online without Video | 27.30% | 217 |
| Telephone | 49.18% | 391 |
| Online Chat | 26.16% | 208 |
| Email | 9.56% | 76 |
| Texting | 11.95% | 95 |
| Other (please specify) | 5.91% | 47 |
| Total Respondents: 795 | | |

Q28 What method did you primarily use to provide psychotherapy services to clients when working for or contracting with the platform?



| ANSWER CHOICES | RESPONSES | |
|---------------------------------------|-----------|-----|
| Online with Video (Videoconferencing) | 91.95% | 731 |
| Online without Video | 1.13% | 9 |
| Telephone | 1.89% | 15 |
| Online Chat | 3.27% | 26 |
| Email | 0.25% | 2 |
| Texting | 0.88% | 7 |
| Other (please specify) | 0.63% | 5 |
| TOTAL | | 795 |

Q29 Did you ever use texting to provide therapy to your clients when working for or contracting with the platform?



| ANSWER CHOICES | RESPONSES | |
|----------------|-----------|-----|
| Yes | 17.99% | 143 |
| No | 82.01% | 652 |
| TOTAL | | 795 |

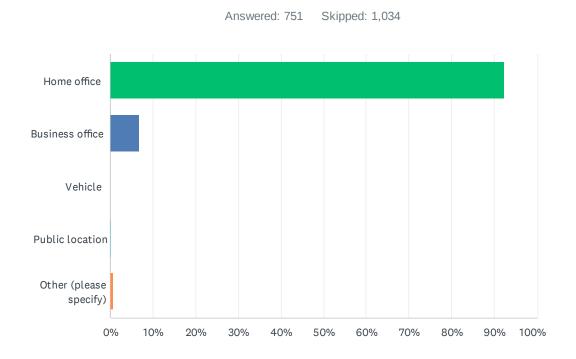
Q30 Please explain how you integrated texting into therapy with your clients.

Answered: 111 Skipped: 1,674

Q31 Please explain the procedure for verifying client's identity when providing therapy via texting with them.

Answered: 112 Skipped: 1,673

Q32 Where were you primarily located when you provided therapy services on this platform?



| ANSWER CHOICES | RESPONSES | |
|------------------------|-----------|-----|
| Home office | 92.28% | 693 |
| Business office | 6.92% | 52 |
| Vehicle | 0.00% | 0 |
| Public location | 0.13% | 1 |
| Other (please specify) | 0.67% | 5 |
| TOTAL | | 751 |

Q33 What confidentiality measures were taken to mitigate for the separate location of the therapist and the client?

Answered: 661 Skipped: 1,124

Q34 Did you experience any advantages to working for or contracting with an online-only therapy platform, versus working on your own or for a company with a physical site?

Answered: 687 Skipped: 1,098

Q35 Please describe any problems you encountered when working for or contracting with the online-only therapy platform.

Answered: 664 Skipped: 1,121

Q36 Do you have any other comments or concerns you would like to share related to your experience working for or contracting with an online-only therapy platform?

Answered: 576 Skipped: 1,209