



January 11, 2021

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Location Information Feasibility Reply Comments
WC-Docket No. 18-336

Dear Secretary Dortch,

Vibrant Emotional Health, the nation's leading mental health organization for emotional wellness and administrator of the National Suicide Prevention Lifeline (Lifeline), is grateful to the Federal Communications Commission (FCC or Commission) for the opportunity to provide reply comments on the feasibility of providing location information to the Lifeline. Vibrant appreciates the comments provided by other filers, including many organizations and entities that share Vibrant's vision that individuals can achieve emotional well being with dignity and respect. It is Vibrant's hope that these reply comments can provide additional context and clarification with respect to Lifeline policies and readiness to receive location information data.

Lifeline Routing Infrastructure Ready to Receive and Protect Location Information

- *How Lifeline's area code routing system currently operates.* Currently the Lifeline handles all call routing to individual centers within the network utilizing Lifeline's own routing database keyed on area code and exchange. This routing model does not rely on telecommunications providers to route to crisis centers within the Lifeline network. Nor does this model rely on specific uniform equipment across the over 180 independent centers within the Lifeline network. When a center joins the network, test calls are performed to verify a center's telecommunications provider is able to properly receive a call using Lifeline's routing.
- *Shifting from area code routing to geolocation routing could preserve public health and safety resources.* When Lifeline callers are properly connected to the call center nearest to them, counselors are best able to connect them to any local services that could keep them safe. If a caller is in need of crisis outreach and/or stabilization services in their community, local centers are most capable of seamlessly connecting them to mobile crisis teams or whatever crisis response/care services are in their area. As a result, unnecessary use of law enforcement, EMS and emergency department resources can be avoided. However, if calls are routed by area code and a caller at high risk is linked to a center that is not near where the individual is actually located, the remotely responding



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Lifeline center is not familiar with potentially nearby alternative crisis response services. Consequently, the responding counselor is more likely to rely on 911 to assure the safety of callers at high risk who are unable/unwilling to keep themselves safe.

- *Geolocation could save lives of callers at imminent risk of suicide.* As addressed in previous comments, routing based on area code and exchange can result in routing mismatches if the keyed area code and exchange does not match the individual's actual physical location, as is often the case for cell phone users. Comments from the Boulder Regional Emergency Telephone Service Authority illustrate the tragic outcome of what can occur when a routing mismatch occurs between public safety answering points (PSAPs). In a transcript provided by the Boulder Regional Emergency Telephone Service Authority, it was the loss of mere minutes that prevented the identification of the location where a suicide attempt was in progress. Routing based on location information would prevent these mismatches and allow individuals in crisis to quickly connect with crisis centers serving their local areas.
- *Enabling geolocation for the Lifeline will not affect caller privacy.* As administrator of the Lifeline and other programs focused on emotional well-being, Vibrant places the utmost importance on protecting personal information. Vibrant maintains the confidentiality of all client/consumer information, including, but not limited to, all names, addresses, telephone numbers, identifying information, diagnostic information, or program participation information in accordance with applicable laws and regulations, including HIPAA and HITECH. Vibrant adheres to best practices as dictated by leading technology companies to secure personal data. Regular third party auditing is utilized to ensure these standards are met and improved upon as necessary when requirements and practices within the industry evolve. Vibrant's robust security measures ensure that personal information, including location information, is protected.

Lifeline Privacy and Risk Policies Strive to Keep Individuals in Crisis Safe

- *Vibrant and Lifeline's Crisis Centers are dedicated to preserving caller privacy and trust in the service.* Vibrant agrees with other commenters that help-seeking behavior should be encouraged, particularly when individuals may be in a suicidal or mental health crisis. Calls to the Lifeline are confidential to encourage this help-seeking and all Lifeline calls, chats, and texts are confidential and private unless imminent risk dictates an active rescue or there is a request for records by court order. Vibrant requires member centers to have policies that meet guidelines established by accreditors and the Lifeline, including on privacy and data retention. Currently, all of our complaints are handled by our Quality Improvement team who respond to and investigate every complaint to ensure crisis center adherence to the Lifeline policies.
- *All Lifeline member centers are dedicated to national best practice standards.* Our policies are based on clinical standards and best practices to ensure crisis centers



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provide the highest quality service to individuals in crisis situations. The iterative nature of our standards allow for updates based on evidence based practices and data driven metrics. Participation in the Lifeline network requires crisis centers to meet and adhere to our clinical standards and guidelines. These requirements are uniform throughout the network and the administrator is only able to provide this oversight to the centers who are participating members. The use of non member centers to provide service to individuals contacting 988 would lessen the ability of the administrator to ensure clinical standards are met and that vulnerable individuals receive quality suicide prevention and mental health crises supports.

- *Although geolocation routing will be essential for all Lifeline calls, Lifeline counselors will need to access caller location information only in rare but urgent circumstances.* Lifeline policy requires crisis centers to practice the least invasive intervention with all individuals reaching out to the Lifeline. This includes only accessing location information in imminent risk situations, as defined by Lifeline’s Imminent Risk policy. Furthermore, Lifeline provides additional directives regarding active rescue and lifesaving services. The policy clearly states that involuntary interventions should be a last resort for individuals at imminent risk of suicide. Involuntary intervention, and therefore the need to access geolocation information, only occurs when the individual is unwilling or unable to secure their own safety, and when without intervention the individual is likely to sustain a life-threatening injury. Emergency services are deployed in approximately 2% of all Lifeline calls, with the majority of those calls occurring in collaboration with the caller. The Substance Abuse and Mental Health Services Administration (SAMHSA) noted in its report to the Commission that recent research demonstrated that crisis counselors actively obtained the collaboration of the vast majority of callers they identified as being at imminent risk, consistent with the Lifeline Imminent Risk policy. The same report also noted that for calls “involving imminent risk, the risk level was able to be reduced without the use of police or ambulance through collaborative interventions, such as reducing access to lethal means, involving a third party, collaborating on a safety plan, and agreeing to receive rapid follow-up from the crisis center.” Vibrant continuously refines these policies to ensure feedback from individuals with lived experience, marginalized communities, high risk populations, and other stakeholders are incorporated.

Location Information is a Vital Component of a Coordinated Crisis Response System

The Commission noted the ability of a three digit dialing code, 988, to improve the accessibility of individuals reaching life saving suicide prevention and mental health crisis intervention through the Lifeline. Vibrant believes in a vision for 988 as America's mental health safety net and that everyone in the US and the territories will have immediate access to effective suicide prevention, crisis services and behavioral healthcare through 988. This vision and mission is guided by the tenets of universal and convenient access to 988 through varying modalities based on an individual’s needs and preferences; a tailored high quality and personalized



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experience that is consistent with established best practices and clinical guidelines; and connections to localized resources and follow-up care as appropriate.

- *Technically, Lifeline crisis centers will not need to make adjustments to receive calls routed to them via geolocation.* Location information is a crucial component of achieving this vision to reduce routing mismatches when connecting individuals to needed interventions. It is important to note that for current call routing, Lifeline requires only the coarse location data to be passed with the call, which only reveals the caller's approximate location, i.e. area code, and does not rely on the carriers to route to the closest center. With geolocation routing, the current routing database would be replaced enabling the routing to be performed based on the approximate location of the caller. Technically, crisis centers within the Lifeline network would not need to undergo any upgrades, changes to infrastructure or require installation of Customer Premises Equipment (CPE) as the routing logic is handled by Lifeline prior to call delivery.
- *Geolocation of callers can be routinely used for routing to centers nearest the caller, while caller location details would only be revealed to counselors in cases where emergency services are required to save a caller's life.* Mobile call detail records contain two fields "CALLING SUBSCRIBER FIRST LOCATION AREA CODE" and "CALLING SUBSCRIBER FIRST CELL ID" which if provided to Lifeline during the initiation of the call would enable the call to be routed to the closest center without divulging precise location information and maintaining caller privacy. The first field is "coarse location", that could be used for routing calls to local centers by determining the nearest cell phone tower to the caller, and connecting them to the nearest center to the cell tower. This could be used routinely without divulging the caller's precise location information and maintaining caller privacy. The second field is "fine location," and could be accessed by counselors only in the event it was required to save a caller's life. As discussed above, the vast majority of calls do not require active rescue services and would not need access to the finer location information. However, when such information is needed to save a life, technology should not impede the identification of an individual's location. The lack of accurate location information does not affect a counselor's decision as to whether or not a caller at high risk needs emergency services. Rather, the lack of accurate location information only affects how rapidly the response occurs, whether they show up at the right location, or whether they show up at all.

Vibrant Welcomes Collaboration with Stakeholders

Vibrant has also identified several opportunities for collaboration in keeping with the vision and mission of 988. Vibrant believes that integration between Lifeline and 911/PSAP authorities utilizing location information would more quickly facilitate the deployment of an appropriate response team. Increased collaboration between 911 systems and 988 can provide more options for those in crisis, such as dispatching mobile crisis teams to individuals in mental health or suicidal crises rather than police or EMS, and greater coordination of care options like crisis



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stabilization units. Such collaborations can reduce the burden on the costly use of hospital emergency departments. Vibrant continues to work with mental and behavioral health stakeholders to better serve individuals at risk of suicide in the United States. Collaboration with telecommunications providers will also be necessary for the success of 988.

988 is a watershed moment in the history of crisis and behavioral health care in the United States, and presents an opportunity to reach millions in emotional distress while de-stigmatizing help seeking. As the administrator of the Lifeline network, Vibrant understands that collaboration is needed between crisis centers, state and local authorities, mental health advocates, telecom providers, and federal agencies including the Commission and SAMHSA to determine a 988/crisis response model that meets the needs of their state and incorporates the best practices in crisis coordination, while providing effective support for people in crisis every day.

Sincerely,

A handwritten signature in black ink that reads "Kimberly Williams".

Kimberly Williams
President and CEO
Vibrant Emotional Health