



A GUIDE FOR YOUTH PEER SUPPORT PROGRAMS

The Liability Gap

Why peer supporters shouldn't use personal phones,
and what to do instead

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A common practice with an uncommon risk

In many youth peer support programs, peer supporters contact young people from their personal phones. Texts, calls, and social media messages run through devices the organization doesn't own and can't see.

Usually no one decided this on purpose. Programs launch without a dedicated way to communicate, and a personal phone is the fastest way to stay connected between visits.

The intent is good. The gap it creates is real.



What the gap looks like

When support runs through a personal phone, the relationship happens where no one else can see it. That affects everyone involved.



For the young person

- A peer's personal number stays with them after the relationship ends.
- If they reach out in a hard moment and the peer is unavailable, no one else knows.
- Their messages sit on a device the organization can't protect or clear.



For the peer supporter

- They become reachable at all hours, with no clear line between work and life.
- When a conversation turns serious, there's no built-in way to bring in a supervisor.
- They carry the weight of every conversation alone.



For the organization

- There's no record of contact, so supervisors can't see who is engaged and who has gone quiet.
- When a peer leaves, the history of their work leaves with them.
- If something goes wrong, the organization can't show it was providing reasonable oversight.

Why it matters now

Peer support is growing fast, and the expectations around it are growing with it.¹ The personal-phone model doesn't hold up under that weight.



Oversight

Supervision is only as good as what a supervisor can see. Without visibility, problems surface after they've already caused harm.



Funding

Medicaid billing for peer services comes with documentation rules: federal guidance ties them to an individualized plan of care, and states set their own record requirements.^{2,3} Grant funders may ask for records too. Contact that lives on personal phones is hard to report and easy to lose.



Privacy

Young people share sensitive information with their peers. When it sits on personal devices, the organization can't account for where it goes.



Continuity

Peer supporters move on. A program built on personal phones loses its history every time someone leaves.

¹ Certified peer support specialists grew from about 30,000 to 82,000 nationally over the past decade. SAMHSA Office of Recovery, Peer Support Specialists: A Growing Mental Health and Addictions Workforce, 2024. library.samhsa.gov/sites/default/files/peer-support-mh-addictions-workforce-pep24-08-005.pdf

² Centers for Medicare & Medicaid Services, State Medicaid Director Letter #07-011, 2007. downloads.cms.gov/cmsgov/archived-downloads/smdl/downloads/smd081507a.pdf

³ For example, California DHCS, Behavioral Health Information Notice 23-068, 2023. Rules vary by state. dhcs.ca.gov/Documents/BHIN-23-068-Documents-Requirements-for-SMH-DMC-and-DMC-ODS-Services.pdf

What professional standards say

Related professions have named the personal-phone risk directly. Peer support codes speak to boundaries in general terms.

Social work technology standards

Joint 2017 social work standards say practitioners “shall consider the implications of their use of personal mobile phones and other electronic communication devices for work purposes.” They note that giving clients a personal mobile number “might limit the social worker's ability to maintain appropriate boundaries with clients and compromise client confidentiality.” Ideally, the employer provides the devices and sets clear policies (paraphrased).¹

Federal health privacy guidance

A 2017 federal cybersecurity newsletter notes that mobile devices “are at a greater risk of being lost or stolen,” and that organizations that don't allow personal devices for work should have “policies ... in place and enforced that make such prohibitions clear.”²

Social work ethics

The NASW Code of Ethics asks social workers to protect the confidentiality of electronic communications, including text messages and mobile communication, and to explain their technology policies to clients (paraphrased).³

Peer support codes

The peer codes we reviewed address boundaries and dual relationships. A few, such as Minnesota's and Pennsylvania's, extend those rules to electronic or social media contact. None names personal phones or texting from a personal number, which leaves the decision to each organization.⁴

These standards apply to social workers and HIPAA-covered organizations, not directly to peer supporters. They show where related fields have landed. Quotation marks show exact wording; “paraphrased” marks a summary. General information, not legal advice.

¹ NASW, ASWB, CSWE & CSWA, Standards for Technology in Social Work Practice (2017), Standards 2.11 and 3.02. socialworkers.org

² HHS Office for Civil Rights, Cybersecurity Newsletter, “Mobile Devices and Protected Health Information (PHI),” October 2017. hhs.gov

³ National Association of Social Workers, Code of Ethics (2021), Standards 1.03(e) and 1.07(m). socialworkers.org

⁴ Peer support codes of ethics reviewed September 2026: Ohio (2022), Pennsylvania (2018), New York (2018), Texas, Georgia, Florida (2022), Michigan (2022, two codes), California, and Minnesota (2021), plus the iNAPS National Practice Guidelines (2019).

What closing the gap looks like

Closing the gap doesn't mean watching every conversation. It means giving the relationship a home the organization is responsible for, so peers and young people are both protected.

1 An organization-owned channel

Peers and young people connect through a platform the organization provides, not personal numbers or accounts.

2 Supervision without surveillance

Supervisors can see caseloads, check-ins, and flagged concerns, so they know who needs attention. Private conversations between peers and young people stay between them.

3 A clear escalation path

When a conversation turns serious, a peer can flag a concern or message their supervisor from inside the app, and a one-tap 988 call button sits on the young person's home screen.

4 Records that stay with the program

When a peer moves on, the history of the relationship doesn't leave with them. The program can pull that history into reports it can save and share with funders.

5 Healthy boundaries

Peers aren't reachable on their personal phones at all hours, and a young person isn't left holding a former peer's personal number.

6 Data the organization controls

Information stays with the program, access is limited by role, and deletion requests are handled through the platform.

Questions to ask about your program

If you can't answer yes to most of these, your program likely has a liability gap.

- ☐ Do peer supporters contact young people through a secure platform the organization provides, rather than personal phones or social media?
- ☐ If a peer left tomorrow, would you still have a record of their work with each young person?
- ☐ Can a supervisor tell when a young person has gone quiet or raised a concern?
- ☐ Is there a clear way for a peer to escalate a safety concern, at any hour?
- ☐ When a peer relationship ends, is the young person left without the peer's personal contact information?
- ☐ Could you show a funder how often peers are actually connecting with the young people they serve?
- ☐ Do you know where the information young people share with peers is stored, and who can access it?



Ready to close the gap in your program? Blueprints, step-by-step toolkits for program leaders, are at shareandsolve.app/#blueprints.

ABOUT

Share+Solve and Peer Bridge

Share+Solve and Peer Bridge help organizations run their own youth peer support programs. They don't replace your peer supporters, your training, or your program. They give the work you already do a safe, supervised home.

Share+Solve

Where peers and young people connect: messaging, check-ins, goals, and meet-ups, with a one-tap 988 call button on the home screen.

Peer Bridge

Where supervisors see the whole program: caseloads, check-ins, escalations, and program-level reporting.

Private conversations between peers and young people stay between them. Your organization controls its program data, and deletion requests are handled through the platform.

Built by John Dellick, MBA, a nationally recognized peer support professional with nearly a decade in youth peer support and behavioral health.



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