

County of Santa Clara Health System

Vocera Communication Technology

Annual Surveillance Report: July 1, 2022 – June 30, 2023

1. DESCRIPTION OF HOW THE SURVEILLANCE TECHNOLOGY WAS USED

The Surveillance Use Policy for Vocera Communication Technology was used to enable staff to quickly communicate with each other at different locations throughout the Santa Clara Valley Medical Center (SCVMC), O'Connor Hospital (OCH) and St. Louise Regional Hospital (SLRH). Vocera is a communication tool to call individuals or to broadcast a message to groups/teams.

Enterprise Systems Support Group (ESSG) Team created the accounts, built the workflow, and configured the Vocera devices. The nurse teams, facilities, and environmental services (janitorial/housekeeping) departments operated and managed the devices. Assignment of devices varied by unit. Some units had enough devices to assign one to each staff member and others had to share devices among shifts. Vocera users can only login to the Vocera devices when an account is created for them by ESSG.

The Vocera system is licensed to have a maximum of 850 devices connected with an average of 450 concurrent connections. Vocera does log the date and time that users logged into the device, as well as a record of the time and location of each device and the frequency of incoming and outgoing calls. The Vocera backend server stores logs of when users are logged in from the device. The log does contain the information of the Wi-Fi Access Point that device is connected to which can indicate its location. Request of this log requires review and approval from Employee Services Administration (ESA) and the Chief Compliance Officer - Health System.

Vocera devices did not store information. There have been no reports of misuse and the system is functioning properly and used as defined in the Surveillance Use Policy (SUP).

2. DATA SHARING WITH OUTSIDE ENTITIES

During the reporting period, County of Santa Clara Health System (CSCHS) did not share Vocera Communication Technology data with any outside entities. Any requests for the data would be directed to the Technology Services and Solutions Service Desk.

3. COMMUNITY COMPLAINTS OR CONCERNS

CSCHS values community and customers' feedback and has several ways for the patients and customers to file their concerns, questions, or complaints with the Customer Relations, Administration, or Compliance Office.

During the reporting period, CSCHS did not receive any community complaints regarding the Vocera Communication Technology at SCVMC, OCH, and SLRH.

4. NON-PRIVILEGED INTERNAL AUDITS/POLICY VIOLATIONS

The Managers or Supervisors of each unit were assigned to provide oversight of the Vocera devices in their units, and TSS maintained the hardware and ESSG maintained the application.

Prior to users being given access to Vocera, they were required to review the training materials per their department guidelines. Training documents and videos were hosted on HHSCconnect and can be referenced by users when needed. The SUP was included on the training site so that all users have a copy. ESSG have provided a copy of the SUP to the employees and have obtained their written confirmation that the employees understand it.

There were no reports of inappropriate use of the Vocera Communication Technology, and no sanctions were necessary related to use of these technologies.

The SUP indicates the data retention period is three years. ESSG has confirmed that there is a rule to ensure data is deleted every three years. They provided an audit record to the CSCHS Compliance Office that confirmed the data on the system is within the data retention period.

5. EFFECTIVENESS IN ACHIEVING IDENTIFIED PURPOSE

During the reporting period, CSCHS used the Vocera Communication Technology effectively to allow efficient, immediate, hands-free, reliable, timely, and secure voice communications between staff members at various locations in the hospitals. This technology was invaluable for staff to communicate and contact each other quickly to respond to issues within the hospital.

6. PUBLIC RECORDS ACT REQUESTS

The Health System Ethics, Privacy & Compliance Office tracked all California Public Records Act requests for CSCHS and during the reporting period, there were no Public Records Act requests that involved Vocera Communication Technology.

7. ANNUAL COSTS

During the reporting period, the total cost for the Vocera Communication Technology service was \$345,164.

- Maintenance and Support Services: \$222,129
- Personnel (.75 FTE) \$123,035

Anticipated cost for the next reporting period is \$345,164.

- Maintenance and Support Services: \$222,129
- Personnel (.75 FTE) \$123,035

The cost is from the SCVMC Budget Unit 921 Enterprise Fund.