

County Santa Clara Health System

Telephonic and Voice Recording Equipment

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

1. DESCRIPTION OF HOW THE SURVEILLANCE TECHNOLOGY WAS USED

The County Santa Clara Health System (CSCHS) used the Telephonic and Voice Recording Equipment to record telephonic communications between the customers/patients with CSCHS call center representatives. These recordings were used for quality assurance and to evaluate the effectiveness of the telephonic interactions between the representatives and customers and patients. A pre-recorded message informed the customer and patient that the call is being recorded for monitoring and quality control purposes.

There is an average of 95,000 calls a month that are being recorded. There are 150 licenses that allow for recording of calls. The program assigns a license to the agent's line when a call is answered and continues recording until the call is terminated.

The access to the recordings via a portal login is limited to Valley Connections manager and supervisors, Language Services Program Manager, and four system administrators in Technology Services and Solution (TSS). There is an access process through the TSS Service Desk to grant or change user permissions to the portal that must be requested by the Department Head based on the user's job role. The users can only access logs for their departments and do not have access to the other department's logs.

There was one incident of inappropriate use of the technology as detailed in section 4 below. After addressing the incident, the systems are functioning properly and used as defined in the Surveillance Use Policy (SUP).

2. DATA SHARING WITH OUTSIDE ENTITIES

During the reporting period, CSCHS did not share any telephonic and voice recording data with outside entities. Any requests for the data would be directed to the Valley Connections manager.

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 telephonic and voice recording equipment at CSCHS.

4. NON-PRIVILEGED INTERNAL AUDITS/POLICY VIOLATIONS

The Valley Connections manager, Language Services supervisors, and the TSS unit who manages the system, received a copy of the SUP and confirmed in writing that they understand it.

The Health System Ethics, Privacy & Compliance Office worked with TSS to perform an audit on the data retention requirements for this technology. The audit confirmed that the data is being deleted appropriately in compliance with the SUP data retention requirements (three years). CSCHS complied with the Surveillance Use Policy requirements regarding oversight of the technology.

There was one incident of inappropriate use of the technology. CSCHS has been working on updating the SUP to allow call recording by other Health System call centers. On April 4, 2023, the CSCHS Ethics, Privacy & Compliance Office was notified that the BHSD Call Center had started recording their calls on March 10, 2023, even though the SUP had not been updated or approved yet to allow this. The department was immediately instructed by the CSCHS Chief Compliance Officer to stop recording calls and to ensure that all calls were deleted from the system. Technology Services and Solution (TSS) confirmed all recordings were deleted as of May 9, 2023. BHSD understands they cannot turn on this technology until the SUP has been updated and approved by the Board.

5. EFFECTIVENESS IN ACHIEVING IDENTIFIED PURPOSE

CSCHS used the telephonic and voice recording equipment to conduct quality assurance on interactions between call center staff and customers/patients. This technology allowed the Call Center to improve its delivery of critical assistance and services to the public by providing opportunities to give staff additional customer service training, identifying areas for improvement on the call length, and resolving any patient complaints.

6. PUBLIC RECORDS ACT REQUESTS

The Health System Ethics, Privacy & Compliance Office tracked all California Public Records Act requests for CSCHS and there were no Public Record Act requests that involved data gathering by this system.

7. ANNUAL COSTS

During the reporting period, the CSCHS call center and language services maintained 150 licenses to operate the telephonic and voice recording equipment. The total service fee was \$19,747.

The anticipated cost for the next reporting period will be \$19,747.

This comes from the SCVMC Budget Unit 921 Enterprise Fund.