

County of Santa Clara Health System

Badge and Biometric Readers

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

1. DESCRIPTION OF HOW THE SURVEILLANCE TECHNOLOGY WAS USED

The County of Santa Clara Health System (CSCHS) used the Badge and Biometric Readers at CSCHS facilities to create a secure environment for all visitors and employees. The Badge and Biometric Readers system provided employees with access to necessary areas in order for them to perform their job duties and keeps the employees out of areas that they were not authorized to enter. The badge readers collect the time and location of every badge-in by an employee. Biometric readers capture unique physical characteristics of individuals such as an image of a single fingerprint. Badge readers are not used by the public, so there is no data collected on the public.

There were two types of badge reader systems in use at CSCHS facilities: 1) legacy systems on an older platform and scheduled to be replaced and 2) the upgraded system.

There were approximately 2,900 badges readers in use at CSCHS facilities. SCVMC Protective Services Office, O'Connor Hospital Allied Universal Security, SLRH Facility Department and Facilities-IT had access to the badge data.

There were no audit trails available on the legacy system. On the new system, all access is logged via audit trail and all requests for badge access reports are logged by the Facilities-IT team or SCVMC Protective Services.

There have been no reports of misuse and the systems are functioning properly and were used as defined in the Surveillance Use Policy (SUP).

2. DATA SHARING WITH OUTSIDE ENTITIES

During the reporting period, CSCHS did not share Badge and Biometric Readers 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 use of badge and biometric readers at CSCHS facilities.

4. NON-PRIVILEGED INTERNAL AUDITS/POLICY VIOLATIONS

Personnel assigned to ensure compliance with the SUP is the Manager of Facilities-IT and the Director of Protective Services. They have provided a copy of the SUP to their users who install and manage the data and are obtaining their written confirmation that the staff understand the policy.

The SUP indicates the data retention period is two years, and Facilities IT has confirmed the data was deleted every two years by reviewing audit records. The Health System Ethics, Privacy & Compliance Office performed an audit to confirm the data retention requirements were being followed for this technology. There were no violations of the Surveillance Use Policy related to the use of badge and biometric readers. CSCHS complied with the Surveillance Use Policy requirements regarding oversight of the technology.

There were no reports of inappropriate use of the Badge reader and Biometric Reader technologies, and no sanctions were necessary related to use of these technologies.

5. EFFECTIVENESS IN ACHIEVING IDENTIFIED PURPOSE

CSCHS used the badge reader and biometric reader technologies to successfully provide a secure environment for all patients, visitors, and staff at CSCHS facilities by allowing access to only authorized users. This allowed employees to access to areas of the facilities necessary based on their job roles and kept employees out of areas that they are not authorized to enter.

6. PUBLIC RECORDS ACT REQUESTS

The Health System Ethics, Privacy & Compliance Office tracks 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 total cost for the badge and biometric readers service was \$577,350. The total cost included:

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| - Badge reader upgrade projects: | \$300,000 |
| - Operational hardware (Badge Readers): | \$110,000 |
| - Internal resources: | \$96,100 |
| - Moves/Adds/Changes: | \$71,250 |

The next reporting period includes several new projects to upgrade obsolete systems as well as ongoing replacements with a cost of \$4,435,500. Cost is broken down as follows:

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| - Operational hardware (Badge Readers): | \$4,100,000 |
| - Internal resources: | \$250,000 |
| - Moves/Adds/Changes: | \$85,500 |

The source of funding is from Budget Unit 921 which is an Enterprise Fund and a County Capital Project.