

County of Santa Clara Health System

Real Time Location System (RTLS) Technology Used at O'Connor Hospital, Santa Clara Valley Medical Center, St. Louise Regional Hospital, and Clinics

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

1. DESCRIPTION OF HOW THE SURVEILLANCE TECHNOLOGY WAS USED

The Real Time Location System (RTLS) Technology has begun to be implemented at the hospitals and clinics.

The new Hugs Infant Protection System has been implemented at a portion of Santa Clara Valley Medical Center's Labor and Delivery Unit with 60 tags deployed. The new Wanderguard System has been implemented at Santa Clara Valley Medical Center's Sobrato Pavilion with 20 tags deployed to assist with monitoring adults at risk of wandering.

The RTLS will be used to monitor patient admissions to the hospital units by placing a banded tag on the child/adult. The patient's gender, last name, and room number are entered into the system to identify the patient, and the tag is then activated. Sensors are placed at O'Connor Hospital (OCH), Santa Clara Valley Medical Center (SCVMC), St. Louise Regional Hospital, and clinics in several points around units using the technology for safety and security. Alerts are sounded for any unauthorized movements or if the tag is improperly removed or tampered with. When the patient is discharged from the hospital, the band is removed, and the patient's information is deleted from the system.

2. DATA SHARING WITH OUTSIDE ENTITIES

During the reporting period, County of Santa Clara Health System (CSCHS) did not share data in the RTLS technology system with any outside entities.

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 the Health System Ethics, Privacy & Compliance Office.

During the reporting period SCVMC did not receive any community complaints regarding the Real Time Location System (RTLS) Technology.

4. NON-PRIVILEGED INTERNAL AUDITS/POLICY VIOLATIONS

The personnel charged with ensuring compliance with the Surveillance Use Policy (SUP) is the Women and Children's Service Line Director, Biomed Manager, and the Nurse Managers of the units the technology is used. The Departments using the technology have provided a copy of the SUP to the employees and are obtaining their written confirmation that the employees understand it.

The only staff with access to the RTLS's data was the Labor and Delivery (L&D) nursing staff, Sobrato Pavilion nursing staff, Mother, Infant, Child Center (MICC) nursing staff, Pediatric Unit nursing staff, Protective Services Officers (PSOs), Dispatch Hospital Communication Officers, and Biomedical staff. Each patient department had their own view and access to just the child ren /adults currently admitted in their unit and they could not see into other units. The PSOs and Biomedical staff could access all units. There was no mechanism to access data on discharged patients because data is deleted at discharge, and there are no audit trails available.

The Health System Ethics, Privacy & Compliance Office performed a review of the user access and system retention processes and found no violations of the Surveillance Use Policy related to the use of RTLS Technology. SCVMC complied with the Surveillance Use Policy requirements regarding the oversight of the technology. The RTLS data was stored on the servers from birth/admission to discharge of the patient. Within 48 hours of discharge, the data was deleted from the system in compliance with SUP.

There were no reports of inappropriate use of the RTLS system, and no sanctions were necessary related to use of these technologies.

5. EFFECTIVENESS IN ACHIEVING IDENTIFIED PURPOSE

CSCHS used this technology to effectively meet the safety and security goals for the children. The use of the infant security tags has demonstrated the effectiveness in achieving the security of infants and children during their hospital stay and alerting security to respond to an incident when necessary. CSCHS is in the process of implementing the new technology at all three hospitals.

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

The total cost for the RTLS (Hugs and Wanderguard) Technology Service during the reporting period was \$900,000 including:

- Operational hardware:	\$800,000
- Internal resources:	\$100,000
- Maintenance:	\$0

There are no installation, repair, or data storage costs during current reporting period. The system will be installed in FY24 which was recently approved by the Board of Supervisors.

For FY24, the anticipated project cost is \$2,903,328 to fully implement RTLS, including:

- Securitas Healthcare HUGS:	\$1,680,079
- AeroScout Asset Management:	\$1,196,839
- Performance Bond & Payment Bond Premium Fee:	\$26,410

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