To our provider community,

As we continue to evolve, the use of technology for service provision becomes more and more common. We, like you, welcome most of it, even with trepidation at times, as the necessary evolution of things. And, as we have seen the rise in its use, we have been forced to revisit and reconsider our long standing position on video camera use. Though we remain steadfast in our commitment in protecting the privacy of those we support, we are aware of periodic requests for its usage that in some instances makes sense. We offer the following as some guidelines for consideration.

1. Any use of cameras in the homes that would be used in private areas (non common areas) such as bedroom and bathroom requires full presentation and approval from the Human Rights Committee.
2. Common areas of the home should have a well-documented rationale, plan, and procedure with sign offs from all residents or guardians and still needs HRC approval.
3. We have received requests for use in areas of the home used for staff and management. These areas typically are med admin areas, or where finances are kept and reconciled. It would be our recommendation that other control measures be explored here, prior to utilizing cameras. In the event that an agency still feels they are necessary, we would request:
   1. The region be notified
   2. That the notification will be shared with QA
   3. That there be a plan for its use. We encourage this to be time limited.
   4. That the media is protected and safeguarded consistent with policies on HIPAA, and meets any and all other legal requirements.
4. The exteriors of homes, including staff parking areas and other property areas, are a management decision of the agency. As we understand it, there is no expected right to privacy for anyone in those areas.
5. Day Programs – given the levels of staffing in day programs it would seem unnecessary to have cameras in most instances. Again, outside your buildings where no reasonable expectation of privacy exists is your right to manage as you see fit. Within the programs we would expect string rationales with policies and procedures for common areas. HRC would need to approve the use with consents, and certainly for private areas like bathrooms and changing areas.
6. Use of electronic surveillance devices or electronic monitoring must comply with §31-48b and §31-48d of the Connecticut General Statutes.

We hope these guidelines are helpful. As we remained concerned about the privacy of those we support