

**Cottonwood, Inc.**  
**Policies and Procedures**

**SECTION:** Residential

**POLICY NO:** 30-007

**SUBJECT:** Remote Video/Electronic Monitoring

**EFFECTIVE DATE:** June 2014

**Policy:**

Remote video or electronic monitoring may be utilized to enhance the quality of life for individuals served by increasing or improving their independence, privacy, health, or safety, and to augment in-person staffing. This may include the use of live-feed cameras to continuously or intermittently monitor the activity of an individual, as well as the use of electronic motion sensors, pressure sensors, entry/exit sensors, or temperature, smoke, or carbon monoxide sensors that may alert off-site caregivers of a potential danger.

**Procedures:**

1. Written consent for remote video/electronic monitoring will be obtained from the individual/guardian as well as all members of the household and/or appropriate guardians and maintained in individual Case Records. Remote video/electronic monitoring will not be used without proper consent.
2. When remote video/electronic monitoring is used, documentation will be maintained in the individual's Case Record detailing the extent of the monitoring, to include:
  - Name of person to be supported by the monitoring
  - Name and other contact information for the monitoring company
  - Type of monitoring system to be used
  - Areas to be monitored
  - Target activity of the monitoring
  - Any limitations of the monitoring
  - Stated identity of all persons who may view the monitored person/activity
  - Release of Information
3. Access to real-time monitored activity will be restricted to:
  - Authorized employees of the HIPAA-compliant monitoring company
  - Cottonwood, Inc. employees within the chain of authority over the monitored site and within the parameters of Cottonwood, Inc.'s HIPAA policies

4. Video archives will be stored for no more than five days on a secure server located at the operations center of the monitoring company. Copies of video may be retrieved within that time frame by persons or entities possessing a signed release of information from the individual/guardian. Other archived data may include a history of sensor readings/alerts and daily written logs of the remote caregivers, all of which may be stored indefinitely by the monitoring company. Access to any and all archived data will be restricted to:
  - Authorized employees of the HIPAA-compliant monitoring company
  - Cottonwood, Inc. employees within the chain of authority over the monitored site and within the parameters of Cottonwood, Inc.'s HIPAA policies
  - Persons or entities possessing a signed release of information from the individual/guardian
  - Authorized employees of Kansas Department for Aging and Disability Services upon written request to the President/CEO of Cottonwood, Inc.
5. Archived data may be used to investigate reports of fraud, abuse, neglect, or exploitation, and other critical incidents.
6. Installation of video/electronic monitoring equipment will include software firewalls to prevent interception of transmitted data as well as VPN devices to make transmitted data uninterpretable to unauthorized users