



Surveillance Impact Report

Call Recording Technology
Human Services Agency

As required by San Francisco Administrative Code, Section 19B, departments must submit a Surveillance Impact Report for each surveillance technology to the Committee on Information Technology (“COIT”) and the Board of Supervisors.

The Surveillance Impact Report details the benefits, costs, and potential impacts associated with the Department’s use of Call Recording, (hereinafter referred to as “surveillance technology”).

PURPOSE OF THE TECHNOLOGY

The Department’s mission is: At the San Francisco Human Services Agency, we are committed to delivering essential services that support and protect people, families, and communities. We partner with neighborhood organizations and advocate for public policies to improve well-being and economic opportunity for all San Franciscans.

The surveillance technology supports the Department’s mission and provides important operational value in the following ways:

Call Recording Technology helps deliver services more efficiently. Additionally, call recording ensures that we are delivering services in an equitable manner to all citizens.

The Department shall use the surveillance technology only for the following authorized purposes:

Authorized Use(s):

- <i>Authorized uses for Call Recording technology at SFHSA vary by Program:)</i>
- <i>San Francisco Benefits Network (SFBN), County Adult Assistance Program (CAAP), CalWORKs (CW), Department of Disability and Aging Services (DAS) MediCal & CalFresh Eligibility (DAS Eligibility), DAS Hub Intake, In-Home Supportive Services Independent Provider Assistance Center (IHSS IPAC. To collect telephonic signatures: (Telsig); and Quality Assurance (QA)</i>
- <i>To provide quality assurance: Family and Children Services (FCS)</i>
- <i>To collect evidence for use in official civil, administrative, and criminal investigations: Special Investigations Unit (SIU)</i>

Surveillance technology may be deployed in the following locations, based on use case:

Call recording technology is deployed at Human Services Agency offices in San Francisco.

Description of Technology

This is a product description of the technology:

Surveillance Oversight Review Dates

PSAB Review: Recommended on 3/23/2023

COIT Review: 6/15/2023

Board of Supervisors Approval: TBD

HSA IT utilizes a VoIP call recording system that enables organizations to store and retrieve voice interactions. Recording is automatic through the Agent ID.

This is a description of how the technology works:

Call recording technology allows our organization to record and store audio recordings from our call centers. The system is configured to monitor when call center agents are on a call and captures the conversation as an audio wav file. The audio files are stored in a secured on-premises server. Authorized users (like call center supervisors/manager) can log into the application to conduct quality assurance reviews of their staff's audio recordings or retrieve a needed telephonic (verbal) signature.

Third-Party Vendor Access to Data

Data collected or processed by the surveillance technology will not be handled or stored by an outside provider or third-party vendor on an ongoing basis. The Department will remain the sole Custodian of Record.

IMPACT ASSESSMENT

The impact assessment addresses the conditions for surveillance technology approval, as outlined by the Standards of Approval in San Francisco Administrative Code, Section 19B:

1. The benefits of the surveillance technology outweigh the costs.
2. The Department's Policy safeguards civil liberties and civil rights.
3. The uses and deployments of the surveillance technology are not based upon discriminatory or viewpoint-based factors and do not have a disparate impact on any community or Protected Class.

The Department's use of the surveillance technology is intended to support and benefit the residents of San Francisco while minimizing and mitigating all costs and potential civil rights and liberties impacts of residents.

A. Benefits

The Department's use of the surveillance technology has the following benefits for the residents of the City and County of San Francisco:

Benefit	Description
<input type="checkbox"/> Education	
<input type="checkbox"/> Community Development	
<input type="checkbox"/> Health	
<input type="checkbox"/> Environment	
<input type="checkbox"/> Criminal Justice	
<input type="checkbox"/> Jobs	
<input type="checkbox"/> Housing	

X	Other: Consistent and equitable service delivery, Reduced time to service delivery	The use of HSA call recording technology for telephonic signature reduces processing time by eliminating the need for obtaining an ink signature from clients, in compliance with California Assembly Bill 135. The use of call recordings for QA ensures that HSA staff provide appropriate, equitable customer service
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B. Civil Rights Impacts and Safeguards

The Department has considered the potential impacts and has identified the technical, administrative, and physical protections as mitigating measures:

Whenever a client calls SFHSA call center a recorded message informs them of the call being recorded for quality and training purposes. When SFHSA staff call a client directly, they inform the client that the call is being recorded for quality and training purposes and request client consent to be recorded. Workers are aware and are reminded quarterly that Call Center phones are recorded and are advised to use their personal phones for personal calls.

The administrative safeguards are: Staff in Programs who utilize call recording technology are required to take an annual Technology and Confidentiality training. Calls are reviewed to ensure call quality and adherence to privacy and technology policies.

The technical safeguards are: Transmission of voice call data between the telephony system and the call recording system takes place entirely within a secured local area network (LAN) in an on-premise HSA datacenter. Transmission of recordings from the system servers to individual workstations (for listening or download) is secured by use of TLS encryption. Data at rest on the voice recording system is protected by logical controls restricting access to authorized user ids that have provided strong username-password authentication. Individual recordings that have been downloaded to user workstations are protected by operating system filesystem access controls as well as full disk encryption using federal standards for encryption algorithms. Network controls prevent access to the voice recording system using unauthorized (non-agency) workstations or devices.

The physical safeguards are: Physical access to the datacenter is restricted to a limited set of IT staff and facilities engineers, and access is monitored.

C. Fiscal Analysis of Costs and Benefits

The Department’s use of the surveillance technology yields the following business and operations benefits:

	Benefit	Description
X	Financial Savings	Call recording also results in financial savings by eliminating the need to print, mail and process client intake and renewal packets

X Time Savings Call recording at HSA eliminates the need for obtaining ink signatures (preparing packets, mailing them, receiving and processing the returned packet). Therefore HSA staff use less time on client onboarding activities.

Staff Safety

Data Quality

Other

The fiscal cost, such as initial purchase, personnel and other ongoing costs, include:

<p>Number of Budgeted FTE (new & existing) & Classification</p>	<p>The call recording technology does not require new FTE. Existing staff supporting include:</p> <ul style="list-style-type: none"> • One 1093 (IT Operations Support Administrator III) • Two 1823 (Senior Administrative Analyst) • One 1820 (Junior Admin Analyst) • One 2913 (Program Specialist) • One 1094 (IT Op Support Admin IV) • One 1043 (IS Engineer Senior) • One 0923 (Manager II) <p>Each of these individuals spend approximately 1% of a typical work week supporting the call recording technology.</p>	
	Annual Cost	One-Time Cost
Total Salary & Fringe	None	N/A
Software	\$440,000	N/A
Hardware/Equipment	None	N/A
Professional Services	None	N/A
Training	None	N/A
Other	None	N/A
Total Cost	\$440,000	

The Department funds its use and maintenance of the surveillance technology through

Funding sources for call recoding technology are:

- 13% federal,
- 12% state, and
- 75% general fund.

COMPARISON TO OTHER JURISDICTIONS

The surveillance technology is currently utilized by other governmental entities for similar purposes.

Other government entities have used the surveillance technology in the following way: Call recording technology has been utilized by other government entities in similar context and for the same purposes - for telephonic signatures and quality assurance. This includes local, state and federal entities.

The effectiveness of the surveillance technology while used by government entities is determined to be the following: Call Recording technology provides quality assurance of consistent and appropriate interactions with the public. It can enhance workforce performance using the call recordings for training, coaching and improvement initiatives to provide better service to the public. It also is used to ensure compliance with local, state and federal policies. Call recordings used for Telephonic signatures have shown to save time, decrease traffic in public benefit offices, simplify the application and recertification process which more expeditiously connects clients to Supplemental Nutrition Assistance Program (SNAP formerly Food Stamp program) benefits.* "Best Practices for SNAP Telephonic Signature." Food Research & Action Center. May 2019. pp. 1-4. These benefits also will benefits members of the public applying for health coverage through The Affordable Care Act (ACA). Effective assistance over the phone will play a key role in ensuring that health reform reaches the millions of Americans eligible for coverage. *"Telephonic signatures an essential tool for enrollment." Rachel Meeks Cahill. Bifocal July-August 2013, Vol 34, No 6. pp 129-131.

There have not been adverse effects of the surveillance technology while it has been used by other government entities.