



Surveillance Impact Report

SCRAM Continuous Alcohol Monitoring (CAM)
Juvenile Probation Department

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 SCRAM Continuous Alcohol Monitoring (CAM).

DESCRIPTION OF THE TECHNOLOGY

The Department's mission is to serve the needs of youth and families who are brought to our attention with care and compassion; to identify and respond to the individual risks and needs presented by each youth; to engage fiscally sound and culturally competent strategies that promote the best interests of the youth; to provide victims with opportunities for restoration; to identify and utilize the least restrictive interventions and placements that do not compromise public safety; to hold youth accountable for their actions while providing them with opportunities and assisting them to develop new skills and competencies; and contribute to the overall quality of life for the citizens of San Francisco within the sound framework of public safety as outlined in the Welfare & Institutions Code.

In line with its mission, the Department uses SCRAM Continuous Alcohol Monitoring (CAM): Continuous alcohol monitoring (CAM), as ordered by the Court, is used as a measure of stepped up supervision for youth on probation, supporting the Department's mission to respond to individual risks and needs, engage in fiscally sound strategies that promote the best interest of youth, support victims, and to utilize the least restrictive interventions and placements that do not compromise public safety, and contribute to the quality of life of the citizens of San Francisco.

The Department shall use SCRAM Continuous Alcohol Monitoring (CAM) only for the following authorized purposes:

- Youth are only placed on continuous alcohol monitoring (CAM) in San Francisco with a court order. The Court may order a youth to be placed on CAM as a condition of probation, if the Court determines that is in the interest of public safety and the youth's wellbeing. CAM data is analyzed on a daily basis by probation officers to ensure compliance with the Court's order.

Any use(s) not identified in the Authorized Use(s) above are strictly prohibited.

Department technology is located in San Francisco and the Bay Area.

Surveillance Oversight Review Dates

COIT Review: February 17, 2022

Board of Supervisors Review: TBD

Technology Details

The following is a product description of SCRAM Continuous Alcohol Monitoring (CAM):

Like a breathalyzer for the ankle, the SCRAM Continuous Alcohol Monitoring (SCRAM CAM) bracelet provides 24/7 transdermal alcohol testing for hardcore drunk drivers, high-risk alcohol and domestic violence caseloads. By automatically sampling the wearer's perspiration every 30 minutes, the SCRAM CAM bracelet eliminates testing gaps and encourages accountability. SCRAM CAM not only supports sobriety but also results in higher compliance rates with court orders and increases community safety.

A. How It Works

To function, SCRAM Continuous Alcohol Monitoring (CAM) consists of placing FCC-certified ankle bracelets on participants that provide transdermal monitoring of alcohol consumption 24 hours a day, by sampling the wearer's perspiration every thirty minutes. The bracelets are placed in such a way that they cannot be removed. The bracelet transmits transdermal monitoring information via the cellular network to a central computer. SCRAM provides a web-based interface for JPD to access the monitoring data.

All data collected or processed by SCRAM Continuous Alcohol Monitoring (CAM) will be handled or stored by an outside provider or third-party vendor on an ongoing basis. Specifically, data will be handled by SCRAM of California to ensure the Department may continue to use the technology.

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 SCRAM Continuous Alcohol Monitoring (CAM) has the following benefits for the residents of the City and County of San Francisco:

- **Criminal Justice:** The Court may order a youth to be placed on CAM as a condition of probation, if the Court determines that is in the interest of public safety and the youth's wellbeing to abstain from the consumption of alcohol
- **Public Safety:** Continuous alcohol monitoring (CAM) enables the Court to utilize the least restrictive intervention to respond to juvenile delinquency and promote public safety.

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:

The Department has considered the potential civil rights/liberties impacts associated with the surveillance technology and has identified administrative, technical, and physical safeguards to mitigate these impacts through responsible technology and data use policies and procedures. JPD utilizes SCRAM continuous alcohol monitoring only as ordered by the Court for authorized use cases. All other uses are expressly prohibited.

Administrative Safeguards: All sworn Probation Services Personnel are provided training by SCRAM on how to install, removed, activate, and deactivate, a Continuous Alcohol Monitor, as well as being able to navigate the SCRAM web-based interface prior to using the system prior to accessing or using the technology. The Director of Probation Services or designee will be responsible for enforcing the Surveillance Technology policy through its incorporation into the overall Department Policyope for Probation Services. All sworn Probation Services personnel will be trained on the Surveillance Technology policy. Violation of the policy will be subject to standard JPD departmental policies, which may include disciplinary action up to and including termination.

Technical Safeguards: The system used Transport Layer Security (TLS) transmission and is encrypted at rest; the system also includes security measures that allow only authorized personnel to access.

Physical Safeguards: Hardware is stored in locked office.

C. Fiscal Analysis of Costs and Benefits

The Department's use of SCRAM Continuous Alcohol Monitoring (CAM) yields the following business and operations benefits:

- Time Savings: Continuous alcohol monitoring benefits department operations by enabling the Department to ensure compliance with court ordered conditions in a manner that is responsive to individual risks and needs, and by engaging in fiscally sound strategies that promote the best interest of youth, support victims, utilize the least restrictive interventions and placements that do not compromise public safety, and contribute to the quality of life of the citizens of San Francisco.

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

- Number of FTE (new & existing): Technical support is provided by SCRAM.
- The annual costs are:
 - Total Salary & Fringe: 0
 - Software: 0
 - Hardware/ Equipment: 0
 - Professional Services: \$5,962
 - Training: 0

- Other: 0

The Department funds its use and maintenance of the surveillance technology through juvenile justice apportionments from the state.

COMPARISON TO OTHER JURISDICTIONS

SCRAM Continuous Alcohol Monitoring (CAM) are currently utilized by other governmental entities for similar purposes.