ST. MARGARET'S HEALTHCaring, Commitment / Dedication, Dignity / Respect, Quality PERSONNEL POLICY MANUAL

SUPERSEDES:

NONE

SUBJECT: FUNCTION:

BIOMETRIC TECHNOLOGY POLICY HUMAN RESOURCES, PHARMACY

ISSUING DEPARTMENT(S): HUMAN RESOURCES, PHARMACY

PURPOSE:

1.

DATE ISSUED: JUNE 27, 2022

It is the purpose of this policy is to disclose the use of the Omnicell and Pyxis systems and to disclose how the data will be maintained and how the information will be disposed of following any termination of employment.

II. POLICY:

This policy is intended to advise employees of the nature and extent of systems in use by St. Margaret's Health-Spring Valley and St. Margaret's Health-Peru (the "Hospital") may use information which may be considered biometric information or biometric identifiers and subject to the Illinois Biometric Information Privacy Act ("BIPA"), 740 ILCS 14/1, et seq. To the extent BIPA is applicable and out of an abundance of caution, the Hospitals provide this BIPA policy.

The Hospital and/or its vendors collect, store, and use information in the Pyxis and the Omnicell systems for health care treatment, payment or operations.

St. Margaret's Health-Spring Valley utilizes the Pyxis system for pharmaceutical storage and access of medications in specific patient care areas. This system is password protected and when the employee logs into the system for the first time, a finger scan is taken from the employee. In addition, the finger scan is used for identification to gain access to medications. St. Margaret's Health-Peru utilizes the Omnicell system for pharmaceutical storage and access of medications in specific patient care areas. The system is password protected and when the employee logs into the system for the first time, a finger scan is taken from the employee. The overall purpose of the information collected, used and/or stored by either the Pyxis or the Omnicell systems is for health care treatment, payment or operations.

Positions utilizing the Pyxis and/or Omnicell systems include, but may not be limited to, the following job classes of employees; Registered Nurse, Licensed Practical Nurse, Respiratory Therapist, Pharmacist, Pharmacy Technician, Pharmacy Students, Nursing Instructors, Nursing Students, Anesthesia providers and Anesthesia students.

The policy will be available on the hospital's website, <u>www.aboutsmh.org</u>.

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III. DISCLOSURE

The Omnicell and Pyxis technologies use finger scan technology as described above. The Hospital will not disclose, re-disclose or disseminate any biometric identifiers or any data derived from the biometric identifiers which may be obtained or stored by virtue of the use of the Omnicell and Pyxis technologies, other than the vendor providing the technology, vendors providing service or repair to the technology, and any other vendors involved with the technology for the purposes identified above, unless required by law.

The Hospital will not disclose, disseminate, sell, lease, trade, or otherwise profit from the employee's finger scan or data derived or extracted from the scan or image other than what has been described above, unless required by law without/unless:

- a) First obtaining written employee consent to such disclosure or dissemination;
- b) The disclosed data completes a financial transaction requested or authorized by the employee;
- c) Disclosure is required by state or federal law or municipal ordinance; or
- d) Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction

IV. RETENTION AND DESTRUCTION GUIDELINES

The Hospital will retain any biometric identifiers during the term of employment until the initial purpose for collecting or obtaining such data has been satisfied. The Hospital will delete such date within one hundred twenty (120) days after the termination of employment.

V. STORAGE, TRANSMISSION AND PROTECTION

During the period of time the Hospital retains biometric data, the storage, transmission, and protection from disclosure shall be conducted in the same manner in which the Hospital stores, transmits and protects from disclosure its other confidential and sensitive information, including patient information. Any biometric data will be destroyed one hundred twenty (120) days of the termination of the employee.

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SUBJECT:

BIOMETRIC TECHNOLOGY POLICY

FUNCTION:

HUMAN RESOURCES, PHARMACY

ISSUING DEPARTMENT(S): HUMAN RESOURCES, PHARMACY

DATE ISSUED: JUNE 27, 2022

SUPERSEDES:

NONE

VI. **PROCEDURE**

The consent form will be provided to new hired employees for review and signature. The completed consent form will be kept in the employee's HR file.

Approved By:

President & CEO

Developed By:

Lisa R. Blackburn

Director of Human Resources

Director of Pharmacy

06/03/2022 v3