

Executive Office of Health and Human Services
Department of Developmental Services
Use of Technology that Monitors or Tracks Guidance



Contents

INTRODUCTION:	1
PURPOSES FOR THE USE OF TECHNOLOGY:	2
SECTION 1: GENERAL USE	2
SECTION 2: INDIVIDUALIZED USE	2
SECTION 3: MULTI-USER USE	2
DEFINITIONS:	2
SECTION 1: GENERAL USE	3
Technology Used for Security Surveillance	4
Process for Ensuring Safeguards are in Place for General Use:	4
SECTION 2: INDIVIDUALIZED USE	4
Technology Used for Health Support	4
Technology Used to Support Independence	4
Technology Used for Risk/Behavioral/Clinical Support:	5
Process for Ensuring Safeguards are in Place for Individualized Use:	5
SECTION 3: MULTI-USER USE	6
Technology Used for Virtual Service Delivery (Telehealth)	7
Technology Used for Case Management and Communication with Others	7
Process for Ensuring Safeguards are in Place for Multi-User Use:	7
Plan for Use of Technology	9
Consent	12
Provider Policy Guidance:	8

INTRODUCTION:

Technology is continually evolving and changes how people interact with their environment and manage their lives. As technology advances, new options are being developed that foster greater independence and offer less intrusive and less staff-intensive methods of service provision.

The use of technology has many advantages and the purpose for usage varies. For instance, there are devices that electronically relay information to medical professionals about the functionality of a pacemaker. There are apps with GPS tracking capacity that enable people to navigate safely in the community with staff able to provide real-time verbal guidance if needed. There are also sensor devices to monitor one's safety at home. These are just a few of the types of technology available to individuals today.

Even with all of these benefits, technology also presents a risk to the right to privacy. Therefore, there is a need to put in place safeguards to ensure that the right to privacy is protected. The purpose and nature of the

technology used will inform the extent and nature of the safeguards used to protect individuals' privacy, rights, and well-being.

DDS will require that the use of technology that allows monitors/tracks individuals for certain purposes requires informed consent, and an opportunity for the individual/guardian and, in some cases, other parties to weigh the benefits of technology against the trade-offs. Within DDS furnished services, video monitoring equipment/devices should not be installed in a bathroom, bedroom, or other personal care areas. If a provider can support that there is a medical or health and safety need for the use of video monitoring equipment in a person's bedroom, bathroom or other personal care areas, the provider can request a review.

When supporting individuals with technology that has the capacity to impact individuals' privacy, the provider must develop, maintain, and enforce written policies, which address how the provider will ensure the participant's rights of privacy, dignity, and respect; how the provider will ensure the provision of services through the use of technology meets applicable information security standards; and how the provider will ensure its provision of services through the use of technology complies with applicable laws governing individuals' right to privacy.

This guidance covers the following use of technology that has the capacity to monitor and/or track individuals to facilitate the provision of supports.

Scope of Guidance:

This guidance applies to providers of services or supports operated, certified, licensed, contracted for, or funded by the Department of Developmental Services.

It does not apply to the independent use of technology by individuals, e.g., the use of publicly accessible platforms or applications such as FaceTime or Zoom.

PURPOSES FOR THE USE OF TECHNOLOGY:

SECTION 1: GENERAL USE

[Technology Used for Security Surveillance](#)

SECTION 2: INDIVIDUALIZED USE

[Technology Used for Health Support](#)

[Technology Used to Promote Independence](#)

[Technology Used for Risk/Behavioral/Clinical Support](#)

SECTION 3: MULTI-USER USE

[Technology Used for the Virtual Delivery of Services \(Telehealth\)](#)

[Technology Used for Case Management and Communication with Others](#)

DEFINITIONS:

"Assistive Technology (AT)" means any item, piece of equipment, software program, or product system that is used to increase, maintain, or improve the functional capabilities of persons with disabilities. (*Technology-Related Assistance of Individuals with Disabilities Act 1988, 100th Congress*)

"Healthcare Practitioner (HCP)" - means an individual who is licensed or otherwise authorized by a state to provide health care services. (45 CFR § 60.3)

“Provider” means an individual, agency or other legal entity with day-to-day responsibility for the operation of services and supports or facilities regulated by the Department by law or by contract. [115 CMR 2.01] A provider is knowledgeable of the current practices in the field, adheres to the DDS policy and procedures.

“Individual” means a person receiving services or supports provided, purchased or arranged by the Department. [115 CMR 2.01]

“Individual Support Planning Team” or “ISP Team” means the group that includes the individual; the individual’s family, guardian, or advocate, as applicable; the individual’s service coordinator; persons who provide supports and services to the individual; and any other person who the individual requests to participate. The ISP team shall assist the individual to develop, implement, and evaluate his or her ISP and shall assist the individual to obtain, manage, evaluate, and adjust supports, as needed.

“Provider Human Rights Committee” or “HRC” means the group of persons established by a provider in accordance with 115 CMR 3.09, to affirm, promote and protect the human rights of individuals. [115 CMR 3.09(1).]

“Positive Behavior Supports (PBS)” means a systematic person-centered approach to understanding the reasons for behavior and applying evidence-based practices for prevention, proactive intervention, teaching and responding to behavior, with the goal of achieving meaningful social outcomes, increasing learning and enhancing the quality of life across the lifespan. {115 CMR 502]

“Remote Supports and Monitoring Services (RSM)” is a service that combines technology and direct care staff to support people with developmental disabilities. Remote Supports and Monitoring Services (RSM) provide for an off-site direct service staff that provides live support and monitors and responds to an individual’s health, safety, and other needs using live two-way communication system(s) and other technologies, while offering individuals more independence in their life. The design and technology used for this service is individually tailored based on the completion of a professional evaluation completed by a team with the team leader holding one or more of the following certifications/licenses; Assistive Technology Professional, Occupational Therapist, Physical Therapist, Speech Pathologist, or Rehabilitation Engineer.

“Remote Monitoring Device” means the use of an electronic device that is wearable by a person, or placed or fastened to an object, so that other people can know where they are, measure health metrics or movement by electronic communication (transfer of signs, signals, writing, images, sounds, data or intelligence of any nature transmitted in whole or in part by a wire, radio, electromagnetic, photoelectronic or photo-optical system.)

“Telehealth/Virtual Service Delivery” refers to the use of information technologies and electronic communications to provide remote/virtual clinical/instructional services to individuals. There are three main types of telemedicine, which include store-and-forward, remote patient monitoring, and real-time interactive services. Examples include Videoconferencing, transmission of still images, e-health including patient portals, remote monitoring of vital signs, continuing medical education and nursing call centers.

“Remote Patient Monitoring (RPM)” is the personal health and medical data collection from an individual in one location, which is transmitted via electronic communication technologies to a health care provider in a different location for use in care and related support.

PURPOSES FOR THE USE OF TECHNOLOGY:

SECTION 1: GENERAL USE

General Use means the use of technology in a manner that is the typical of the general public. The safeguards needed encompass the applicable federal and state laws regarding the protection of privacy.

Technology Used for Security Surveillance

Purposes for the Use of This Technology:

Video cameras are commonly used for general security surveillance purposes in public or semi-public areas. The following guidance is in effect for Cameras used outdoor or in areas that are accessible by the general public where a DDS provider furnishes supports.

Types of Technology Examples

Video Cameras

Process for Ensuring Safeguards are in Place for General Use:

1. Video cameras installed at sites such as day services and family support centers for security purposes should be placed on the exterior of the facility. Signage is required to identify that this type of technology/security system is in operation.
 - a. Video cameras installed inside such locations should be placed in a publicly accessed community location.
 - b. Any program, service, or support location where video technology is operational inside is required to notify all persons who enter the premises of the use of video devices. This notification shall be displayed in a way to allow individuals with various abilities to understand that video devices are in use at the location.
2. Video cameras used in DDS-funded/licensed residential locations installed for security/surveillance purposes should be placed on the exterior of homes, including shared living locations. All parties living, working or visiting in the location should be informed that these are in use.

SECTION 2: INDIVIDUALIZED USE

Individualized Use means technology tailored to enable an individual to meet their unique goal or need. The following provides examples of the different types of technology that may be used for the specific purposes as described.

Technology Used for Health Support

Purposes for the Use of This Technology:

To enable staff or healthcare practitioners to monitor and respond to an individual's medical needs by electronically conveying pertinent information regarding an individual's health and safety status to a support staff/caregiver or healthcare practitioner.

Types of Technology Examples: (These encompass monitoring/tracking capacity)

- Devices which monitor health status via sensors, or other means of electronic transmission to measure heart rate, respiration, blood sugar, seizure activity, sleep pattern etc.
- Remote Patient Monitoring devices such as CPAP, Pacemaker, Glucose monitoring that convey information directly to a prescribing practitioner.

Technology Used to Support Independence

Purposes for the Use of Technology:

Technology that supports individuals to complete tasks with greater independence by transmitting data/alert to another party to signify the need for support or guidance. When used for this purpose, the technology is controlled by the individual, and they should be able to turn it off.

Types of Technology Examples: (These encompass monitoring/tracking capacity)

- GPS enabled devices and included apps with capability

- Live Video feed of individual and/or location with two-way communication
- Live Audio feed of individual and/or location with two-way communication
- Sensors/Alarms
- Motion sensing system (mattress pad for when getting out-of-bed or chair)
- Web based monitoring system

Technology Used for Risk/Behavioral/Clinical Support:

Purposes for the Use of Technology:

The use of technology for the purpose of enabling staff to monitor and respond to an individual at risk due to behavioral or clinical concerns, such as leaving a location unsupervised or clinically unsafe behavior. These are devices and technology whose purpose is to identify potential risk remotely.

Types of Technology Examples: (These encompass monitoring/tracking capacity)

- Sensors/Alarms
- Motion sensing system (mattress pad for when getting out-of-bed or chair)
- Audio or Video monitoring in the home
- GPS enabled devices includes apps with capability

Process for Ensuring Safeguards are in Place for Individualized Use:

In addition to ensuring compliance with the applicable laws governing individuals' right to privacy, the following safeguards are needed:

*A best practice would be to support any individual, who is **USING TECHNOLOGY THAT MONITORS OR TRACKS THEM**, to receive an Assistive Technology evaluation to identify devices/tools that best meet their needs and promote independence and have a corresponding Assistive Technology Support Plan, or a Remote Supports and Monitoring Plan.*

- For individuals that do not have such plans in place a [Technology Use Plan can be developed](#).

The following components need to be in place when using technology that has the potential to impact an individual's privacy:

1. A written plan should be in place that includes the following:
 - a. The goal and/or need for the use of specific device(s) and how its use is expected to improve the quality of life of the individual.
 - b. The reason for use should include a description of why the device selected meets the abilities and needs of the individual.
 - i. Technology used for clinical/risk support should include teaching strategies on the use of technology geared towards enabling the individual to fade the need for or use less intrusive technology to mitigate risk.
 - c. Identification of any less intrusive technology/strategies tried and why the device proposed is necessary. For instance, community safety skills training was tried prior to recommending a GPS tracking device, however it was not effective in teaching the individual to navigate safely home.
 - d. The plan should identify how and when the specified technology is to be used and its functionality. For instance, is it a continuous feed video monitor or is it only activated when a sensor is triggered?
 - e. The plan should include strategies to mitigate the impact on others, who live or work with the individual for whom the technology is used, that may be affected by the use of technology.
 - f. Who or what each device will be monitoring;

- g. Within DDS furnished services, video monitoring equipment/devices should not be placed in a bathroom, bedroom, or other personal care areas, unless specific informed consent for use is obtained by the individual/guardian and reviewed by a DDS Human Rights Committee.
 - h. Backup plan for the ongoing use of technology in case of power loss or other emergency situations to ensure their health and well-being. Providers shall establish a system to alert designated staff that a device is not working properly.
 - i. Description of the type and method of data that is anticipated to be collected, if applicable;
 - j. A description of the proposed placement of the video cameras and audio devices; the type of video camera being installed, and the features of the camera intended to be used (i.e., recording capacity, audio capacity, zoom function, motion activation, installed or portable, etc.);
 - k. Frequency of use of video or audio streaming (i.e., all the time, at specific times, at random times, on activation by a sensor, etc.);
 - l. Devices should have an indicator (visual or audio) that notifies the individual and others impacted by technology that it is in use/activated.
 - m. Remote Supports and Monitoring (RSM) Only - Ability to turn off: Technology used to foster an individual's independence, needs to have the capacity to be turned off by the individual. If the individual is at risk if the device is inactivated by the individual, a backup plan such as deploying in-person staffing needs to be in place.
2. Process to educate each individual and his or her guardian, if applicable, on the use of the technology;
 - a. Provide education to individuals with various abilities to understand and discuss with guests that video and audio devices are in use at the location when activated.
 3. Process to provide a copy of all legally required notifications, describing the use of technology and an individual's rights concerning the use of this technology that is to be used/installed, to the individual or his or her legal representative, if applicable;
 4. Process to protect each individual's privacy;
 5. All technology capable of monitoring/tracking individuals requires *the written informed consent of the individual and/or guardian*.
 6. The individual's ISP Team has reviewed and incorporated the use of the device into the individual's ISP.
 7. The Human Rights Committee (HRC) review is needed for devices used for the purpose of Risk/Clinical Support since these have a potential impact on individuals' rights.

Additional Safeguards for technology used for Health Support:

1. Technology used to monitor an individual's significant health conditions or symptoms should be identified in the individual's **Health Management Plan** if one is in place. (For individuals receiving the Remote Supports and Monitoring Service, this is included within the AT Support Plan.)
2. Technology used to monitor an individual's health conditions or symptoms should be approved by a physician/health care practitioner who agrees to its use.
3. When the device collects data:
 - a. If monitored by Direct Support Professionals, a description of the type of data that will be collected and how the data is stored needs to be identified (e.g. cloud based, on device, etc).
 - b. If a Remote Patient Monitoring (RPM) device that electronically communicates health related information exclusively with an individual's health care practitioner, identification of the health provider's practice is needed.

***** Remote Patient Monitoring** devices that convey data that is exclusively monitored solely by the individual's healthcare practitioner does not need consent for use to be obtained from the individual/guardian by the DDS provider or HRC review.

SECTION 3: MULTI-USER USE

Multi-User use means technology that uses platforms/software that allows one or multiple users to access information and/or real-time audio/video chatting/conferencing. The following provides examples of the different types of technology that may be used for the specific purposes as described.

Technology Used for Virtual Service Delivery (Telehealth)

Purposes for the Use of Technology:

The use of technology for the provision of services by direct support professionals or clinicians at a distant site who engage with a person or persons using interactive technology that has the capability for two-way, real-time audio and video communication. Virtual Service Delivery (Telehealth) can be used in the following services:

- Family Training
- Peer Support
- Supported Employment
- Behavioral Supports and Consultation
- Individualized Day Supports
- Individualized Home Supports
- Transitional Assistance
- Assistive Tech (Evaluation, Training only)
- Home/Environmental Accessibility Adaptations (assessment and evaluation of home safety)

Types of Technology Examples:

Two-way audio/video communication system (video conferencing where synchronous instruction, interaction and guidance is offered)

Technology Used Case Management and Communication with Others

Technology including apps used for the purpose of individuals to track their goals, real-time monitoring, geolocation tracking, and communication/notifications to each person individually or simultaneously with individuals and/or families/guardians and other stakeholders (clinical team, service coordinators, etc). (Ex. [Navigating Life](#), [Safe4all](#), [CreateAbility/Employment-Suite/](#))

Types of Technology Examples: (These encompass monitoring/tracking capacity)

- Apps
- Electronic Records used by multiple users

Process for Ensuring Safeguards are in Place for Multi-User Use:

In addition to ensuring compliance with the applicable laws governing individuals' right to privacy, the following safeguards are needed:

1. Process to educate each individual and his or her guardian, if applicable, on the use of the technology to be used; including education on cyber safety if needed.
2. Process to provide a copy of all legally required notifications, describing the use of technology and an individual's rights concerning the use of this technology that is to be used/installed, to the individual or his or her legal representative, if applicable;
3. The individual's ISP Team has reviewed and approved the use of the device and its use has been documented in the individual's ISP.
4. All technology capable of monitoring/tracking individuals requires the written informed consent of the individual and/or guardian.

Provider Guidance:

As noted in the introduction, providers need to develop and enforce policies and procedures that protect individuals' privacy. In addition to procedures needed to comply with applicable laws governing individuals' right to privacy, the following should be addressed:

- a. Providers shall ensure that any area where an individual's private medical information is located or can be accessed is only monitored in a way that protects this information from being seen, heard, or recorded by a video or audio device (i.e., file cabinets, desks and computer screens are out of camera view, audio devices are not used in areas where confidential information is likely to be discussed).
- b. Staff shall comply with mandated reporting requirements and report any instance that a video or audio live feed provides a reasonable cause to believe abuse, abuse per se, assault, sexual abuse, financial exploitation or mistreatment occurred. [115 CMR 9.02, 9.05(1-3), 118 CMR, G.L. c.19C].
- c. An individual, an individual's guardian, or other person who is visiting or working with the individual may request that a video or audio device be turned off if private or confidential information is being discussed in a location where there are such devices. DDS or providers shall make every reasonable effort to accommodate these requests.
- d. How the provider, and electronic support system used, will maintain the individual's privacy;
- e. How the provider will ensure the electronic support system used meets applicable information security standards; and
How the provider use of technology will comply with applicable laws governing individuals' right to privacy.
- f. The provider should confer with its legal representative regarding the tracking of data and recording of video or oral communications in accordance with the Use of Technology in DDS Services Policy.

What is technology that monitors and/or tracks?

Any technology that has the capability to allow a caregiver to monitor and/or track a person. It can help keep you safe and promote greater independence. The equipment used may include alarms, sensors, cameras, and other devices. For more information, see *Use of Technology in DDS Services Policy*.

Important information

If you agree with the monitoring technology being proposed, you will need to sign at the end of this form to indicate your agreement.

You have the right to have others present when the use of technology is discussed with you. You can ask people you know and who know you (including family, friends, and advocates) to join you in the discussion.

We recognize there will be times when your guardian may need to be more heavily involved in this process. However, regardless of your ability to make decisions, you should be involved in the informed consent and planning process as much as possible.

Once this form is completed, **the following must be completed:**

1. Maintain a signed copy of this document in your file.
2. A copy given to you or your legal representative.
3. A copy given to your Service Coordinator to include in your Individual Support Plan.

FIRST NAME		LAST NAME		MI	
Living Situation	<input type="checkbox"/> Lives alone <input type="checkbox"/> Lives with another person(s) <input type="checkbox"/> Proposed Tech is not used at home		Does any of the technology used impact others?	<input type="checkbox"/> YES <input type="checkbox"/> NO	If, yes who?
Are you under guardianship?	<input type="checkbox"/> Yes <input type="checkbox"/> No		If yes, which type?	<input type="checkbox"/> Full <input type="checkbox"/> Medical (Only Consent for Medical Use)	
PROVIDER NAME			CONTACT PERSON		

PURPOSE:

What is the purpose for the use of technology (see Use of Technology Guidance)

✓ Check all that apply:

Please note: The use of audio or video equipment in bedrooms/bathrooms or personal care areas only with required approval from the OHR and DDS Regional Director or designee:

Purpose(s):	Describe intended outcome for use:
<input type="checkbox"/> Technology Used to Support Independence	
<input type="checkbox"/> Technology Used for Health Support	
<input type="checkbox"/> Technology Used for Risk/Behavioral/Clinical Support	
<input type="checkbox"/> Technology Used for Virtual Service Delivery (Telehealth)	
<input type="checkbox"/> Technology Used for Case Management/Communication with Others	

1. WHAT TYPE AND WHERE WILL TECHNOLOGY BE USED THAT HAS THE CAPACITY TO MONITOR/TRACK A PERSON?

What type of technology will be used where? Check all that apply:

AREA		TYPE	Description
<input type="checkbox"/>	BEDROOM (All video equipment in bedrooms require prior DDS approval)	<input type="checkbox"/> Video/Camera <input type="checkbox"/> Audio listening device <input type="checkbox"/> Fixed sensors (e.g., motion sensors or door alarms. (describe device and if tracks data or not) <input type="checkbox"/> Other (describe)	
<input type="checkbox"/>	BATHROOM (All video equipment in bathrooms require prior DDS approval)	<input type="checkbox"/> Video/Camera <input type="checkbox"/> Audio listening device <input type="checkbox"/> Sensors not located on the person (e.g., motion sensors or door alarms. (describe device and if tracks data or not) <input type="checkbox"/> Other (describe)	
<input type="checkbox"/>	LIVING ROOM	<input type="checkbox"/> Video/Camera <input type="checkbox"/> Audio listening device <input type="checkbox"/> Sensors not located on the person (e.g., motion sensors or door alarms. (describe device and if tracks data or not) <input type="checkbox"/> Other (describe)	
<input type="checkbox"/>	KITCHEN	<input type="checkbox"/> Video/Camera <input type="checkbox"/> Audio listening device <input type="checkbox"/> Sensors not located on the person (e.g., motion sensors or door alarms. (describe device and if it tracks data or not) <input type="checkbox"/> Other (describe)	
<input type="checkbox"/>	OTHER ROOM (Describe) <div></div>	<input type="checkbox"/> Video/Camera <input type="checkbox"/> Audio listening device <input type="checkbox"/> Sensors not located on the person (e.g., motion sensors or door alarms. (describe device and if it tracks data or not) <input type="checkbox"/> Other (describe)	
<input type="checkbox"/>	WEARABLE, ON-PERSON EQUIPMENT (such as body sensors, GPS, APPS in cell phone, seizure watch etc.)	Description	

2. TIME/USAGE: When will the technology be used?

Equipment/Device	Time to be used:	Identify if continuous feed or activated on demand/triggered)
	<input type="checkbox"/> Specific Times: (e.g., 9am to 2pm) <input type="checkbox"/> 24/7 <input type="checkbox"/> In community only	<input type="checkbox"/> Continuous <input type="checkbox"/> Activated

	<input type="checkbox"/> Specific Times: (e.g., 9am to 2pm) <input type="checkbox"/> 24/7 <input type="checkbox"/> In community	<input type="checkbox"/> Continuous <input type="checkbox"/> Activated
--	---	---

3. LESS RESTRICTIVE/INTRUSIVE ALTERNATIVES CONSIDERED

Identify the less restrictive/intrusive alternatives explored or tried and demonstrate why the specified device is most effective and least restrictive/intrusive.

Less Restrictive/Intrusive Alternative Explored	Proposed Equipment/Device and why most effective

The Technology Use Plan, Assistive Technology or Remote Support Plan must:

- Describe the steps to take if I want to stop monitoring technology supervision or equipment temporarily or permanently.
- Describe the alternate plan to support me if/when monitoring technology supervision or equipment is stopped.
- Identify who will have the authority on my behalf to remove or approve changes to the plan for the use of monitoring.

Equipment/Device	How does the individual turn off or request for monitoring technology to be deactivated?	What is the plan to address needs if technology is inactive? (If none needed, state none)	Who has the authority to remove or approve changes to the plan of use?
1.			
2.			
3.			

DEPARTMENT OF DEVELOPMENTAL SERVICES
Consent for the Use of Technology (*monitors/tracks*)
 (Example)

1. TECHNOLOGY'S IMPACT ON YOU AND YOUR RIGHTS

How the use of technology that can monitor/track you will be discussed. Your right to decide to be supported with such technology will also be reviewed. The following has been explained to me. (Check those that apply):

<input type="checkbox"/>	I have the right to say no to the use of monitoring technology.			
<input type="checkbox"/>	I have the right to have the consequences of saying no to monitoring technology clearly explained to me before I decide.			
<input type="checkbox"/>	I have a right to stop or suspend monitoring technology and have an alternative means implemented to meet my needs.			
<input type="checkbox"/>	I have a right to review information gathered during the use of monitoring technology.			
<input type="checkbox"/>	I have a right to limit who can review personally identifiable information gathered by monitoring technology.			
<input type="checkbox"/>	I have a right to information about how the provider will use any and all personally identifiable information or data from the monitoring technology.			
<input type="checkbox"/>	I have a right to review and request changes about the provider's plans for how the monitoring technology is used.			
<input type="checkbox"/>	I have a right to have the information collected through monitoring technology kept secure.			
<input type="checkbox"/>	The information collected from the use of monitoring technology can be used in each of the following:			
	<table border="1" style="width: 100%;"> <tr> <td>Investigation of abuse, neglect, or exploitation</td> <td>Investigation of criminal activity</td> <td>When ordered by a court of law</td> </tr> </table>	Investigation of abuse, neglect, or exploitation	Investigation of criminal activity	When ordered by a court of law
Investigation of abuse, neglect, or exploitation	Investigation of criminal activity	When ordered by a court of law		

2. PRIVACY AND PROTECTION OF PERSONAL INFORMATION

Personally, identifiable information (PII) is any data that can be used to identify a specific individual. It can include IP address, login IDs, social media posts, or digital images. Geo location, biometric and behavioral data can also be classified as PII. Additionally, information permitting physical or online contacting of a specific individual is the same as personally identifiable information.

Data Collection: What personally identifiable data or information will the technology capture? Describe the data collected per device/equipment.

Data Access: Who is authorized to have access to data that is collected through monitoring technology?		
Name	Position/Relationship	Agency/Provider
1.		

INDIVIDUAL LEGAL REPRESENTATIVE AGREEMENT

- This authorization expires 12 months from the date I sign this form, or before that, if I make an informed decision to stop using monitoring technology.
- I can change my mind and decide I do not want to give my consent for monitoring technology supervision or equipment. To do this, I have two options:
 1. Notify my provider in writing, or
 2. Contact my Service Coordinator and say I no longer agree.
- My decision to allow, disagree with or change my mind about monitoring technology does not affect my services, payment, enrollment, or eligibility for benefits.
- If I have additional questions, I can contact my Service Coordinator.

AGREEMENT:

<input type="checkbox"/>	I agree to the use of technology that has the ability to monitor or track me as described in the Plan for Use of Technology/Remote Support Plan/ Assistive Technology Plan.
<input type="checkbox"/>	I do not agree to the use of technology that has the ability to monitor or track me.
Individual/Legal Representative	Relationship to the Individual
Date	