Surveillance Impact Report

BART Crisis Intervention Data Application

21 Day BART Board Notice – March 24, 2023
15 Day Public Notice – March 30, 2023
BART Board Meeting – April 13, 2023

A. Information describing the proposed surveillance technology and how it generally works.

Bitfocus is a privacy-compliant, cloud-based crisis intervention data application. The Bitfocus application facilitates secure and effective interactions between BART's civilian Progressive Policing and Engagement Bureau (PPCEB) and members of the public with whom they engage. PPCEB is a Bureau within the BART Police Department. It serves as a centralized repository for information and institutional knowledge on individuals who are frequently encountered in the context of crisis prevention, intervention, and or response. Individuals will sign a release of information to have their information stored in Bitfocus and it is 100 % voluntary.

Bitfocus will be used by the civilian Progressive Policing and Community Engagement Bureau (PPCEB), Crisis Intervention Specialists (CIS) to allow team members to collect and curate knowledge on individuals suffering from homelessness, mental and physical health challenges, and or substance abuse, in order to improve the District's response to individuals in need.

BART will deploy a custom, isolated version of Bitfocus that will not share data with any other Bitfocus users. Bitfocus will provide real-time access to information that will facilitate interactions between individuals and PPCEB's Crisis Intervention Specialists and improve data collection. The application collates and delivers up-to-date, information on individuals. This allows information collected by Crisis Intervention Specialists (CISs) to be reposited and recoverable between different CIS shifts and Zones. This provides consistency and value to the individual being assisted. When a CIS is engaged with an individual and they check on someone's name or other identifying information as part of their typical routine, the system presents a link directly to the individual's information and history in a mobile-friendly format.

Bitfocus data is collected via a template that takes less than five minutes to complete. CIS' can use it to quickly and efficiently record observed behaviors, and the outcome of an encounter or casual interaction. The District's goal in using Bitfocus is to provide the individual with a Service Plan for assistance with housing, substance abuse, and mental or physical health challenges.

Information from these interactions is curated by the crisis intervention specialists, that can include behavioral context, suggestions to help a CIS' approach and communicate with the person; de-escalation techniques; and/or contact information for advocates, case managers, or family associated with the individual. No substantive privileged data from these contacts will be retained on BART's stand-alone platform due to the limitations under law to social service/mental health information. Additional Bitfocus profile features can alert CIS' to potential safety risks, help clarify individuals' needs, identify and contact support services, and locate additional relevant resources near the encounter site.

The Bitfocus application is intended to provide:
- Access to BART staff summaries of interactions with an individual
- Curated, Collaborative BART CIS Service Plans and Crisis Response Actions
- Effectiveness of BART staff Referral Tracking
- Support Service and Support Person Contact Information for referral purposes.
- Provider Directories and Contact Information to coordinate appropriate assistance
- Analysis & Follow on Service/ Demand Management
- Aid in BART staff coordination of Mental Crisis Assistance and Access to Mental Health Services.

- Increased BART staff coordination to Access to Appropriate Outreach Services and Other Community Resources

Bitfocus integrates and visualizes information from the Bitfocus profile template onto an aggregate dashboard to produce summary statistics for the CIS, as well as aggregate statistics that can be stratified and analyzed.

The goal of Bitfocus is to facilitate outreach assistance and service provision to individuals in need and or crisis. Due to the fact that BART is a regional transit agency, operating in 5 California Counties, BART staff has determined that "locational" data, gathered from the District device running Bitfocus, is a key element in the core function of the solution, as it will assist the CIS in locating more convenient nearby services relevant to their current crisis intervention call. This feature will be enabled on CIS provided devices.

All data use is subject to the "Surveillance Ordinance, Impact Report and Use Policy." for the BART Applications, submitted with this "Surveillance Impact Report".

B. Information on the proposed purpose(s) for the surveillance technology.

The Bitfocus application will be used by BART for the following purposes:

- **Facilitate CIS Interactions with Individuals**
  - Provide CIS' with real-time and time-sensitive information for previously encountered individuals suspected to suffer from homelessness, health challenges, substance use, and other crises.
- **Provide Contextual and Crisis Intervention Response Plan Information**
  - Enable development of Crisis Service Plans by PPCEB.
- **Connect Individuals with Existing Support Systems**
  - Enable BART to more efficiently track interactions and referrals to existing support service providers.
- **Enable Referrals and Location-Based Services**
  - Provide a timely catalog of local service providers, with referral and social service information specific to the individual and specific incident location.
  - Identify appropriate, nearby, and available community partners
  - Aid in mental and physical health assistance and access to health services.
- **Creates Aggregated Data that provides Oversight of Program Effectiveness**
  - Facilitate regular reporting.
  - Enables a data informed approach to improve and adjust workflows.

C. If applicable, the general location(s), it may be deployed.

Deployment will cover all District property.

D. Crime Statistics

Although the intended purpose of the BART Crisis Intervention Data Application is not crime prevention, there are several relevant statistics collected by BART in the regular Quarterly Performance Report (QPR) that can help measure the success of this program. These statistics include:

- Customer Service Complaints related to Quality of Life
- Progressive Policing Contacts by Incident Type
- Service Delay – Delay Incident Details

Furthermore, BART will use the app to collect:

- Calls diverted to Progressive Policing
- Services Offered & Connections Made
- Narcan Deployments
- Progressive Policing Team Deployments

Together, these statistics will be used to ensure that our Crisis Intervention Specialist are focusing on the highest areas of need.

E. An assessment identifying any potential impact on privacy rights and discussing any plans to safeguard the rights of the public.

The Bitfocus application will enable CIS' to collect information regarding people's self-reported mental and physical health, housing status, and substance abuse issues. The scope and purpose for which this information is being collected are defined in the applicable Surveillance Use Policy document. PPCEB takes seriously its commitment to protecting the civil rights and privacy of individuals with whom its staff interact. As such, direct connections between the Bitfocus application and any other Law Enforcement applications(s) are expressly prohibited.

The Surveillance use Policy, related to this Impact Report defines how the data will be collected and used.

This section summarizes technical privacy protections included in the application.

First, the application runs on a platform designed to meet the requirements and standards set forth in the following regulations:

- Health Insurance Portability and Accountability Act (HIPAA) Security Rule
- Confidentiality of Substance Use Disorder Patient Records (42 CFR Part 2) standards

Bitfocus encrypts all data in transit and at rest.

Efforts will be made to ensure that all of the requirements of California law will be fully and adequately addressed, including California's growing list of privacy laws. This data will not be merged with any law enforcement data base or used for any other purpose than to facilitate the provision of homelessness services by other appropriate government agencies. No information about persons contacted by CIS will

be received or utilized from third party agencies within the Bitfocus system. BART intends to establish its Bitfocus platform as a stand-alone system.

Data in the system is protected, and access is granted only to Authorized Individuals as defined in the Surveillance Use Policy. Access to information in the application is further limited based on the user's specific role. The Table below identifies the authorized individuals.

Role	Description of project role/tasks
Sr. Manager of Social Services and Partnerships	System Owner. Primary contact with the Bitfocus application team and will utilize aggregate data to demonstrate the District's efforts to address quality of life challenges.
Office of the Chief Information Officer	Information Technology (IT) Administrator. Required technical infrastructure maintenance, and administrative computer management tasks
PPCEB Supervisors	Manage CISs permissions and access to application. Also, coordinate and verify data integrity routinely. Produce monthly reports utilizing Bitfocus' reporting tool.
CIS's	Responsible for accurate data entry.

F. The fiscal costs for the surveillance technology, including initial purchase, personnel, and other ongoing costs, and any current or potential sources of funding.

Bitfocus will perform the initial application setup ($24,625).

Based on the District's existing staffing plan, ongoing costs for the Bitfocus application are expected to be $33,180, and this includes the annual license fees, on demand training, and access to the entire Bitfocus training library. Any increase in the number of users, will increase the ongoing costs.

G. Whether use or maintenance of the technology will require data gathered by the technology to be handled or stored by a third-party vendor on an ongoing basis.

The Bitfocus application runs on the cloud based Bitfocus platform. All BART-supplied data in the Bitfocus application is owned by BART. The vendor and its subcontractors are prohibited by contract from using data for any purpose other than delivery and administration of the application.

H. Alternative Technologies Considered.

Along with Bitfocus, the District also considered Open Lattice and the development of the District's own custom built application. Alternatives to Bitfocus were more costly and less efficient, even when considering the custom modifications to BART' isolated version of Bitfocus.

I. Summary of Experience from other Agencies.

Bitfocus is currently used with great effect by all 5 Counties that BART operates in, and hundreds of social service providers.

7 out of the top 10 U.S. cities with the largest homeless populations use Bitfocus.

No known failures, civil rights or civil liberties issues.