

Managing Opportunities and Mitigating Risks: Voice-Controlled Devices in Senior Care

New smart speakers and voice-controlled devices (VcDs) are presenting a new set of opportunities and risks. The Internet of Things (IoT) which allows technology and devices to connect, interact, and exchange data, not only enhances quality of life and care for residents, but poses a higher level of security and privacy concerns.

Providers should consider having policies, procedures, and training to mitigate the accepted risks associated with the deployment and use of VcDs that are appropriate to the care setting, application, deployment circumstances and monitor the enforcement of such policies and procedures.

Suggested Policy Guidance:

- It is the policy of <Community> to allow the installation and operation of Voice-Controlled Devices (VcDs) only as specifically identified in this and other applicable policies and procedures.
- It is the policy of <Community> that the IT Department shall establish and implement procedures to evaluate and authorize the HIPAA compliant VcD devices that have applications or skills designed to operate in a clinical environment.
- It is the policy of <Community> that Workforce Members may not intentionally activate VcDs for the communication of Protected Health Information (PHI) unless the application or skill has been approved and authorized by the IT Department as HIPAA compliant.
- It is the policy of <Community> that if a Workforce Member is aware that a non-HIPAA compliant VcD device or skill has been activated in listening mode, Workforce Members shall not discuss PHI, even at the request of a resident or family representative.



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Procedure Guidance for Independent Living, Assisted Living, and Skilled Nursing

Procedure	Resident Owned			Facility Provided		
	ILF	ALF	SNF	ILF	ALF	SNF
Allow the use of VcDs without HIPAA compliant overlay	✓	✓		✓	✓	
Allow the use of VcDs with HIPAA compliant overlay	✓	✓	✓	✓	✓	✓
Train staff on the acceptable use of VcDs within the facility	✓	✓	✓	✓	✓	✓
Post notices in public areas that VcDs may be in use	✓	✓	✓	✓	✓	✓
Post notices in outside private residences that a VcD is in use		✓			✓	
Get signed acknowledgements that VcDs may be in use in the facility and could inadvertently record PHI	✓	✓	✓	✓	✓	✓
Get signed waivers prior to installing or operating VcDs in rooms or residences	✓	✓	✓	✓	✓	✓
Staff may not use personally owned VcDs	✓	✓	✓	✓	✓	✓
VcDs may not be connected to corporate internal networks	✓	✓	✓	✓	✓	✓
Resident-owned VcDs may only be connected to public or resident public WIFI networks		✓	✓			
Facility-owned VcDs may only be connected to VcD specific WIFI networks					✓	✓
IT Department to develop configuration and deployment procedures for VcDs				✓	✓	✓