

# FRIDAY LUNCH SERIES

## RECOVERY & RESILIENCE

### CONTACT TRACING AND DATA COLLECTION BEST PRACTICES



Welcome! We will get started in just a moment!

Reminders for optimal webcast experience!

- Please ensure your video/camera is turned off
- Close out of all applications during the event
- Ask questions by typing them in! We will answer them in the end.
- Dial in if your computer audio is not working, or vice versa



# Pikes Peak Small Business Development Center

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Helping businesses statewide respond to the current health crisis

# COVID-19 Small Business Response Resources



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# RECOVERY & RESILIENCE

## CONTACT TRACING AND DATA COLLECTION BEST PRACTICES



### Host:



**Aikta Marcoulier, MBA**  
Executive Director, Pikes Peak SBDC

### Panelists:



**Haley Zachary**  
Epidemiologist  
El Paso County Public Health



**Dr. Shawn Murray**  
Principal Scientist and the  
President/CEO Murray Security  
Services

**Lori Seago**  
Legal Council  
El Paso County Public health

# Agenda

## Focused Prevention: Contact Tracing for Small Businesses

- The Basics
- How it Works
- Common Misconceptions
- Preparing Your Business

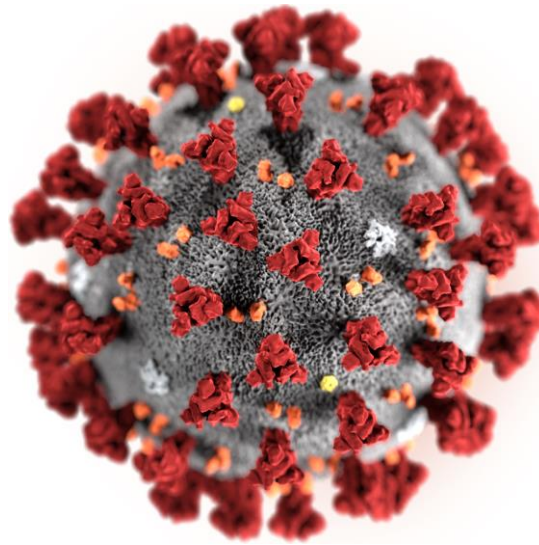
## Requirements & Recommendations

- What is required
- What is recommended

## Data Collection Best Practices

- How to protect your business and customers
- Overview of privacy laws and regulations
- Best practices and solutions

# Focused Prevention: Contact Tracing for Small Businesses



Presented by: Haley Zachary, Lead Epidemiologist, El Paso County Public Health  
Date: June 19, 2020

# The Basics

**Contact Tracing:** Without a vaccine, contact tracing is the key to reopening our local economy:

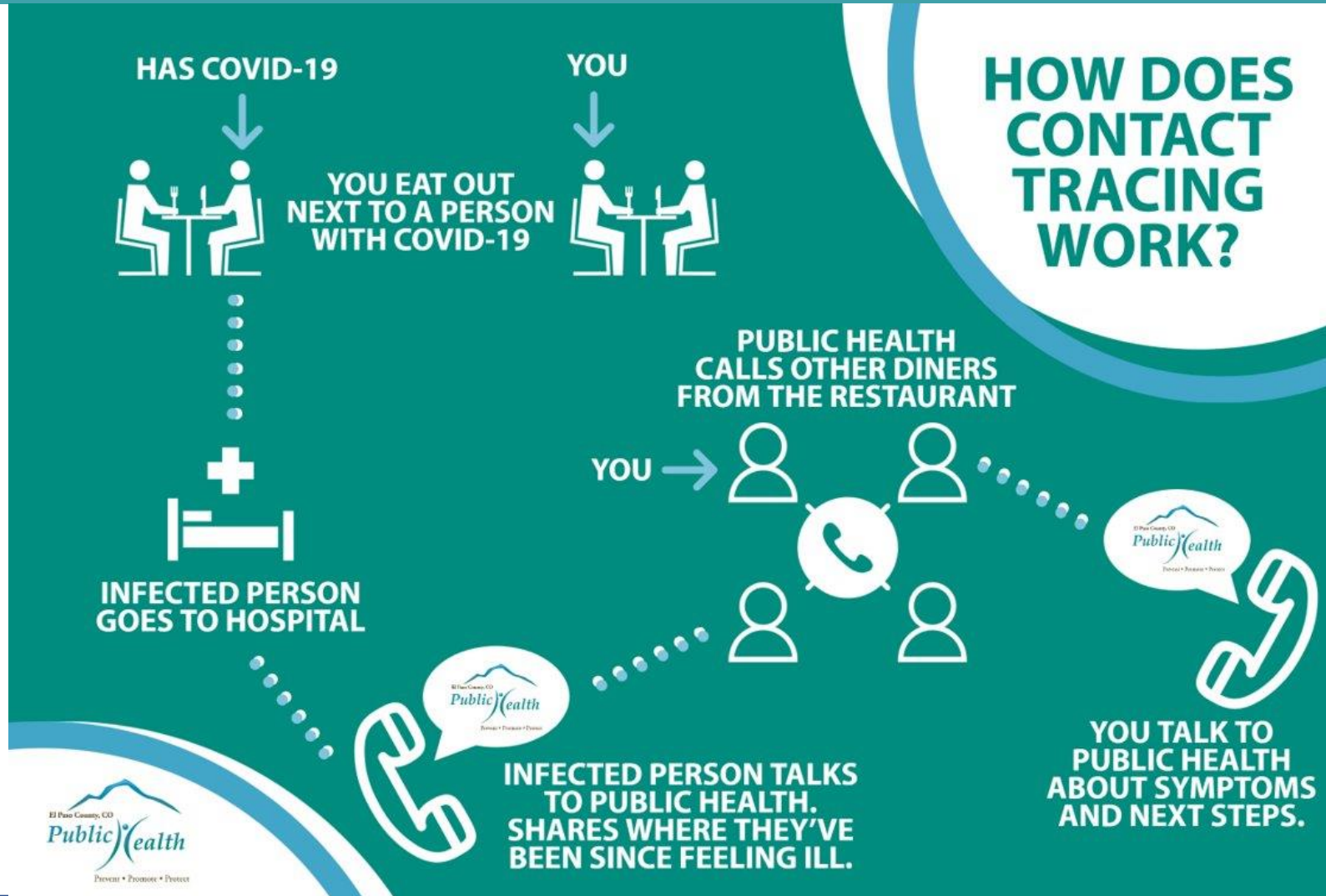
- Focuses prevention on people with known exposure to COVID-19
- Minimizes risk to the general public
- Helps businesses take a targeted approach to illness
- Helps individuals make the most informed decisions
- Keeps case numbers lower
- Prevents high burden on the health care system

# What is Contact Tracing

- Core disease control measure that has been used for decades
- Used by health departments to prevent disease outbreaks
- Key strategy to mitigate the spread of COVID-19 in our community
- Tool we use to help track disease
- The main goal is to protect you and the ones you love



# COVID-19 Contact Tracing: What we do



# Common Misconceptions

## Myth

- Contract Tracing started with COVID-19
- Contract tracing invades people's privacy
- People are being will be interrogated if they agree to contract tracing

## Fact

- Contact Tracing is a core disease control measure that has been used by health experts since the Cholera outbreak back in the 1850s
- Contract Tracing is about tracking disease to help prevent outbreaks, and protect residents from increased COVID-19 transmission
- Epidemiologists do not force people to talk to them. They *ask* people to share with them, in order to protect others, often those closest to them, from getting sick

# COVID-19 Contact Tracing: FAQ's

- Will the health department share information with others?
- How can I be sure that my health information is secure?
- How will my health information be used?
- How long will my health information be stored and protected?
- How do I know that the person calling is from the health department?

# Metrics: How Contact Tracing Impacts Variances

- Incidence
- Age demographics
- Hospitalizations
- Fatalities
- Outbreaks
- Community coordination for mitigation
- Testing
- Treatment
- Vaccine/herd immunity

# Preparing Your Business to Operate Safely - Best Practices

## Workspaces

- Ensure clear planning, preparedness, and organization within the workplace:
  - Assign a COVID coordinator for communication, planning and obtaining supplies necessary to implement proper precautions
- Increase frequency of cleaning and supplement high-frequency disinfection of high-touch surfaces. Eliminate or regularly clean items shared by individuals in common spaces (such as coffee makers).
- Discourage shared workspaces, maintain six feet between spaces
- Post signage on good hygiene and safety measures
- Minimize in-person meetings when possible
- Provide appropriate protective gear like gloves and face coverings



# Preparing Your Business to Operate Safely - Best Practices

## Employees

- Modify flow to minimize contact, designate doors for entry or exit only
- Enable or maximize telecommuting and remote work
- Require face covering for any in-person interactions including coworkers, customers or vendors
- Allow flexible work schedules where possible.
- Encourage frequent breaks to wash hands. Provide hand sanitizer
- Conduct symptom and temperature checks
- Require employees showing signs or symptoms or those who have had contact with known positive cases to remain home

# Preparing Your Business to Operate Safely - Best Practices

## Customers

- Facilitate social distancing requirements with markings for lines
- Provide dedicated in-store hours for vulnerable individuals
- Post signs encouraging use of face coverings and gloves
- Provide hand sanitizer at entrances and high traffic areas
- Install shields, barriers or screens where possible between customers and employees
- Implement contactless where possible (payment, no touch trashcans, digital documents and receipts)

For more guidance, visit <https://www.elpasocountyhealth.org/businesses-and-employers>

# Your Contact Tracing Team

El Paso County Public Health

[www.elpasocountyhealth.org](http://www.elpasocountyhealth.org)

[healthinfo@elpasoco.com](mailto:healthinfo@elpasoco.com)

719-578-3220

# QUESTIONS



# What is required and recommended regarding collecting customer information under the current public health orders:

Presented by: Lori Seago, El Paso County Public Health  
Date: June 19, 2020





## Required

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Under the state Public Health Order (PHO), Field Services, Personal Services, and services in Limited Healthcare Settings are required to maintain a detailed log of customer interactions, including name, phone number and/or email address, and date and location of contact.

## Recommended

Under local PHOs, places of worship and restaurants are recommended to collect attendee/customer information. For restaurants, that includes the name and phone number of one adult in the party, table assignment, and seating and departure times. For places of worship, that includes contact info for one member of a household or consistent social group and seating location.

## Pending (not yet in effect)

Under state guidance, indoor events will be required to collect contact info for guests, along with arrival and departure times. Under the pending local multi-sector variance request, theaters are encouraged to collect name and phone number of one adult and the seat assignments of each group. Attractions are encouraged to collect the name and phone number of one adult and the entrance time of each group. Private special events are encouraged to collect the name and phone number of one adult and the seat assignment, if applicable, of each group.



#### Consulting Expertise Includes:

- Cybersecurity
- Risk & Information Systems Control
- Vulnerability Assessment
- Federal Information Technology
- Program Management
- CISSP

## **Dr. Shawn Murray**

### **SBDC LEAD Cybersecurity Consultant**

#### **President**

#### **Murray Security Services & Consulting**

Shawn Murray is a Principal Scientist and the President/CEO at Murray Security Services. He is assigned to the U.S. Missile Defense Agency as a Senior Cyber Security Professional and is an officer in the U.S. Civil Air Patrol. Dr. Murray has worked with the NSA, FBI, CIA and the U.S. Defense and State Departments on various cyber initiatives and has over 20 years of IT, Communications, and Cyber Security experience.

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# Colorado Passes Far Reaching New Privacy & Cybersecurity Law

- Former Colorado Governor John Hickenlooper signed into law **The Protections for Consumer Data Privacy Act** [HB 18-1128], creating far reaching new requirements for entities that collect or maintain personal identifying information of Colorado residents.
- These requirements, have created one of the strictest state-based privacy and data breach laws in the country, went into effect September 1, 2018. The Colorado Attorney General's office led part of the effort to pass the new law, making enforcement a likely priority.
- The law requires organizations to maintain a policy for disposing documents with consumer data and notify Colorado residents of any potential personal information exposure no later than 30 days after discovering a data breach.



# Colorado Passes Far Reaching New Privacy & Cybersecurity Law

## 1. Why are lawyers calling the new Colorado Privacy law “Landmark”?

The new Colorado Privacy and Cybersecurity law, officially known as **The Protections for Consumer Data Privacy Act** took effect on Sep. 1, 2018, is a major change to Colorado’s privacy law. All companies who do business in Colorado and that handle personally identifiable information (PII) are required to comply.

- **There is no exemption for small businesses!**

## 2. What are the basic requirements of the law?

Businesses must implement and maintain reasonable security measures to protect documents containing personally identifiable information, both on paper and electronically.

- They must **contractually** require third parties that they share this data with, such as cloud service providers and other vendors, to implement those same reasonable security measures and they must implement a written policy covering the disposal of documents containing PII.
- In addition, the definition of PII in this law is extremely broad. Finally, businesses who have a data breach must notify the parties affected within 30 days with no extensions. This is the toughest notification provision in the country.

## 3. What is the definition of reasonable?

Conveniently, the law doesn’t define this, but they do say that it should be commensurate with the risk. It is our opinion that “reasonable” means “best practices” and those have become pretty clear for cybersecurity today.

# Colorado Passes Far Reaching New Privacy & Cybersecurity Law

## 4. What are the consequences of not complying?

The Attorney General can sue for non-compliance and also to recover damages to Colorado residents. More significantly, the AG can file criminal charges if requested by any local District Attorney or the Governor.

## 5. What are the key components of a company's reasonable security program?

Again, thinking in terms of “**best practices**,” some of the key components of a reasonable security program include:

- Create and implement a written information security program
- Perform a risk assessment annually
- Implement ongoing employee training
- Encrypt data at rest
- Implement a set of security policies and procedures
- Create a disaster recovery program
- Implement an incident response program
- Create a document/data retention and disposal policy
- Implement a third party/vendor cyber risk management program.

# How Does the Contact Tracing & Data Collection Practices Apply?

## 1. Colorado defines PII as the following, which is required to be protected under The Protections for Consumer Data Privacy Act:

- That statute defines personal identifying information (PII) as:
  - Social Security numbers,
  - Driver's license or ID numbers,
  - Personal passwords,
  - Health insurance ID numbers and;
  - Biometric data such as fingerprints.

*Note: Breaches, as outlined in a business-focused, frequently-asked-questions page on the attorney general's website, include a hacker electronically accessing data, a mobile data storage device or computer being misplaced or unencrypted information being sent through a payment system.*

## 2. Does my business have to comply?

All business organizations should have an effective strategy for collecting, protecting, storing and disposing of any consumer information that is collected. Under the county's contact tracing and data collection recommendations, the collection of an adult person's name and contact phone number does NOT fall under the state's definition of PII. However, the business should still protect what they are collecting!

*County Requirements for restaurants: Includes the name and phone number of one adult in the party, table assignment, and seating and departure times. Facilities are required to take reservations, either by phone or electronically.*

# How Does the Contact Tracing & Data Collection Practices Apply?

## 3. Now that we know the contact tracing & data collection information is not PII, why does it matter?

As a business you still have a responsibility to protect your customer's information. Here are the recommendations from the SBDC:

- **Do not over-collect!**
  - The purpose of the collection is to meet the re-opening requirements for social distancing and to provide a means for notifying consumer's in the event a potential COVID-19 exposure.
  - Collecting more customer data than is recommended may require additional protection under law.
- **Establish a policy!**
  - Create a simple policy articulating the appropriate data collection, storage and disposal requirements for employees related to customer information under the contact tracing recommendations.
- **Train your employees!**
  - Once you create the policy, train your employees on what to do. You should have positive control over the data you collect until it has been disposed of. The data is to only be used for appropriate business purposes.

## 4. Where can I get help if I need it?

You can contact the Pikes Peak SBDC and request a meeting with one of our cyber consultants. They are here to assist in various methods of helping you identify and solve cyber security problems.



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