



Origination 7/10/2023
Approved 6/26/2023
Effective 7/10/2023
Next Review 6/25/2026

Owner Elizabeth Hernandez: Privacy/Data Protct Ofcr
Category/Chapter Compliance
Applicability OSF All Operating Units
Areas/Depts Organizational

Biometric Information

DEFINITIONS:

1. **Biometric Data:** includes Biometric Identifiers and Biometric Information
2. **Biometric Identifier:** a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry.
 - a. Pursuant to Biometric Information Privacy Act (BIPA), Biometric Identifiers do **not** include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color.
 - b. Biometric Identifiers do **not** include information captured from a patient in a health care setting or information collected, used, or stored for health care treatment, payment, or operations under the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA).
3. **Biometric Information:** any information, regardless of how it is captured, converted, stored, or shared, based on an individual's Biometric Identifier used to identify an individual.
 - Biometric Information does **not** include information derived from items or procedures excluded under the definition of Biometric Identifiers.

PURPOSE:

To describe how OSF Healthcare (OSF) collects, uses, stores, or otherwise possesses biometric data, and protects Biometric Data in accordance with applicable laws, including, but not limited to, the Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, et seq. ("**BIPA**").

POLICY:

1. OSF may collect, store, use, possess, and/or transmit Biometric Data during the course of conducting OSF operations.
2. OSF, or its service providers acting on OSF's behalf, will collect, store, use, possess, and/or transmit Biometric Data for the purposes of identifying Mission Partners and security controls of medication, equipment, and OSF systems. OSF will not sell, lease, trade, or otherwise profit from any Biometric Data that it receives.

PROCESS:

Authorization

Prior to collecting Biometric Data, OSF will obtain written consent from the subject of the Biometric Data or the subject's legally authorized representative.

Disclosure

OSF will not disclose, re-disclose, or otherwise disseminate any Biometric Data to anyone other than its service providers without/unless one or more of the following conditions apply:

1. The subject of the Biometric Data or the subject's legally authorized representative consents to the disclosure or dissemination.
2. The disclosure or dissemination completes a financial transaction requested or authorized by the subject of the Biometric Data or the subject's legally authorized representative.
3. The disclosure or dissemination is required by applicable law.
4. The disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

Retention Schedule

OSF will retain Biometric Data in their possession until the earlier of the following:

1. OSF receives written notice from the subject of the Biometric Data that the initial purpose for collecting or obtaining such Biometric Data has been satisfied, such as the termination of a subject's employment with OSF, a subject moves to a role within OSF for which the Biometric Data is not used, or a patient has discontinued using OSF's services or services that OSF provides, for which the Biometric Data was used; or
2. Within 3 years of OSF's last interaction with the subject of the Biometric Data.

Data Storage

OSF will store, transmit, and protect from disclosure all Biometric Data using a reasonable standard of care and in a manner that is the same as or more protective than the manner in which OSF stores, transmits, and protects other confidential and sensitive information, such as genetic markers, genetic

testing information, account numbers, PINs, driver's license numbers and social security numbers.

REFERENCES:

[Illinois Biometric Information Privacy Act, 740 ILCS § 14/1, et seq. \("BIPA"\)](#)

HYPERLINKS:

[Consent to Collection of Biometric Information](#)

This policy is in effect for OSF Healthcare System, OSF Healthcare Foundation and all OSF Healthcare System subsidiaries and affiliates, except as limited in the header or body of this policy. For purposes of this policy, the terms "subsidiaries" and "affiliates" mean facilities or entities wholly owned or wholly controlled by OSF Healthcare System. The hospitals covered by this policy are:

	Name as listed with Medicare:
X OSF St. Mary Medical Center	ST MARY MEDICAL CENTER
X OSF Saint Francis Medical Center	SAINT FRANCIS MEDICAL CENTER
X OSF Saint James – John W. Albrecht Medical Center	SAINT JAMES HOSPITAL
X OSF St. Joseph Medical Center	ST JOSEPH MEDICAL CENTER
X OSF Saint Anthony's Health Center	OSF HEALTHCARE SYSTEM
X OSF Saint Anthony Medical Center	SAINT ANTHONY MEDICAL CENTER
X OSF St. Francis Hospital & Medical Group	ST FRANCIS HOSPITAL
X OSF Holy Family Medical Center	OSF HEALTHCARE SYSTEM
X OSF Saint Elizabeth Medical Center	Ottawa Regional Hospital & Healthcare Center
X OSF Saint Luke Medical Center	OSF HEALTHCARE SYSTEM
X OSF Saint Paul Medical Center	Mendota Community Hospital
X OSF Heart of Mary Medical Center	OSF HEALTHCARE SYSTEM
X OSF Sacred Heart Medical Center	OSF HEALTHCARE SYSTEM
X OSF Little Company of Mary Medical Center	OSF HEALTHCARE SYSTEM
X OSF Saint Clare Medical Center	OSF HEALTHCARE SYSTEM

Approval Signatures

Step Description

Approver

Date

Education/Communication	Elizabeth Hernandez: Privacy/ Data Protct Ofcr	6/26/2023
Urgent Approval - President, OSF HealthCare	Sister Diane Marie: President- Sister	6/26/2023
Notification	Elizabeth Hernandez: Privacy/ Data Protct Ofcr	6/26/2023

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