

Social Distancing and Contact Tracing (SDCT) Device

Frequently Asked Questions

1. What is a close contact and the purpose of contact tracing in BEP?

Close contact is someone who was within 6 feet of a probable or confirmed infected person for more than 15 minutes over a 24-hour period. The purpose of contact tracing in BEP is to subsequently identify, monitor, and support a probable or confirmed close contact who has been exposed to, and possibly infected with coronavirus 2019 (COVID-19).

2. What is social distancing?

Social distancing, also called “physical distancing,” means keeping a safe space between yourself and other people who are not from your household. To practice social or physical distancing, an individual must stay at least 6 feet (about 2 arm lengths) from other people who are not from the same household in both indoor and outdoor spaces.

3. What is the purpose of the SDCT device?

BEP’s Social Distancing and Contact Tracing Program has two primary purposes. First, to promote and facilitate social distancing by alerting employees and contractors when they are inside of six feet by providing a visual and audible alarm. Second, the SDCT Device will enhance BEP’s speed and accuracy of contact tracing activities after a confirmed positive COVID-19 case by passively collecting interaction data such as the duration of contact between devices.

4. What are the specific circumstances of authorized use for the SDCT wearables and software?

In accordance with the BEP *Interim Social Distancing and Contact Tracing Device Policy and SOP*, the SDCT device and any data collected by the SDCT device is only authorized to be used under three circumstances:

- a. To promote and facilitate social distancing;
- b. If there is a confirmed positive COVID-19 case, data can be used ONLY to track close contacts;
- c. If there is a confirmed positive COVID-19 case, data can be used ONLY to identify high traffic areas where the confirmed positive case has visited.

5. Who oversees BEP’s Infectious Disease Social Distancing and Contact Tracing Program?

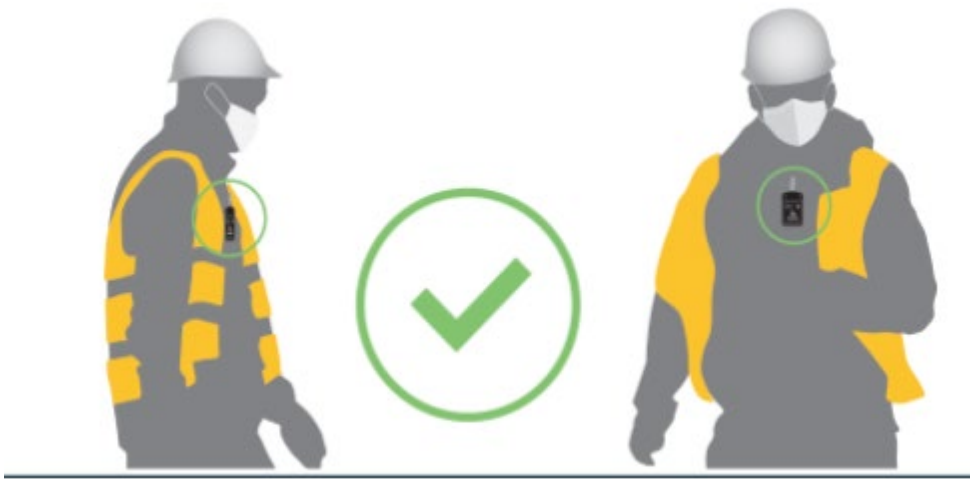
Washington, D.C. Facility (DCF) Office of Environment, Health and Safety (OEHS) and Western Currency Facility (WCF) Safety and Occupational Health Branch (SOHB) administer BEP’s Infectious Disease Social Distancing and Contact Tracing Program.

6. What parts make up the contact tracing system?

The SDCT devices are part of a four component system that also includes charging units, Point of Interest Tags (POIs), and gateways. The charging units are used to charge the devices. The POIs are placed in high traffic and high touch point areas to aid in identifying locations that need to be cleaned. The gateways are placed near entrances in order to collect interaction data from each SDCT device.

7. How should the SDCT devices be worn while on BEP premises?

Similar to PIV badges, SDCT devices must be worn in full view at all times, and above the waist and below the neck (not obscured by clothing or the PIV badge.) See image below for guidance.



8. Can the SDCT device be cleaned or sanitized?

Yes, using a 70% isopropyl alcohol wipe, clean the exterior surface of the device only. Do not use bleach or water based products. Avoid getting moisture in the opening on the side of the device. Do not clean the device while it is charging, or use compressed air.

9. How long does the battery last between charges?

Typical battery life is between 5-8 weeks depending on use.

10. How are the SDCT devices batteries charged?

The SDCT devices must be charged in the vendor provided charging stations. DCF's OEHS and WCF's SOHB will be issuing charging station(s) to each program office for employees and contractors to use.

11. How long does the SDCT device take to charge?

The devices will fully charge in 8 hours.

12. Do BEP employees and contractors need to wear a SDCT device? Is wearing the device optional?

BEP employees and contractors who perform duties in the DCF and WCF for more than three days in a pay period are required to wear a SDCT device until they depart the facility.

13. Who is responsible for ensuring eligible employees and contractors are issued and wearing their SDCT devices? Are Police Officers responsible for the SDCT device compliance?

It is the responsibility of the employee's supervisor or the contractor's COR to ensure that all individuals are issued a SDCT device and are wearing the device while on BEP premises in accordance with the *Interim Social Distancing and Contact Tracing Device Policy and SOP*.

14. Are employees/contractors allowed to turn their SDCT devices off while at the BEP facility?

No, employees/contractors are required to keep the devices turned on while physically present in the facility. The device will flash green to indicate the device is on and functioning properly. BEP employees and contractors may deactivate their SDCT Device when they are NOT physically present in the facility.

15. How will employees/contractors know to maintain social distance while wearing these devices?

If two individuals come within 6 feet of each other, an audible alarm is triggered on the device so he/she knows when distance from another individual needs to be adjusted to maintain safe social distance. In addition, the LED indicator will change from flashing green to flashing red.

16. My employee/contractor forgot or lost their SDCT device. What should they do?

Employees and contractors are responsible for ensuring the security of the SDCT device and must bring it to the facility when the individual is scheduled to work. Supervisors and Contracting Officer Representatives (CORs) will ensure employees and contractors wear the SDCT devices when they are in the facility. If an individual loses or forgets the device, the Supervisors or COR should send the individual to DCF's OEHS and WCF's Safety and Occupational Health Branch to obtain a temporary device. Disciplinary actions may be taken if a BEP employee repeatedly arrives at work without the SDCT device.

17. I have a brand new employee/contractor. How do they receive their SDCT device?

Supervisors or CORs should send the individual entering the facility for more than three consecutive days to DCF's OEHS and WCF's Safety and Occupational Health Branch to obtain a device.

18. My employee/contractor is departing BEP permanently or no longer requires a SDCT device?

Supervisors or CORs will instruct the employee/contractor to return the SDCT device to OEHS/SOHB.

19. My employee's/contractor's device is unresponsive. What should they do?

Supervisors or CORs should send the individual to DCF's OEHS and WCF's SOHB to obtain a replacement device.

20. Does the SDCT device track an individual's location?

No, the device only tracks the device proximity with other devices (gateways, Points of Interest (POIs) and other SDCT devices worn by employees and contractors. The data transmitted between devices is strictly limited to protect workers' privacy. There is no Bluetooth, GPS or off-site location tracking.

21. My employee/contractor needs to work within 6 feet of each other to perform certain duties. Is there a way to silence the alarm during these periods of time?

Yes, to silence an alarm, press the green multi-function button once. As long as the two devices remain within close proximity of each other, the alarm will remain silent. The devices will continue passively collecting interaction data, including duration, between the devices.

22. What information does the SDCT device collect about an individual and stored in BEP's Proximity Trace Gateway Storage?

- Device serial number;
- Peer device serial number; and
- Event time, date, and duration of interaction with peer device;
- Log of date, time, and duration of all events; and
- Date and time of communication with BEP's Proximity Trace Gateway

23. Specifically, what information is NOT collected by the SDCT device?

- Location information;
- Video or audio;
- Biometric information; or
- Additional information about the individual wearing the device

21. How does BEP match a specific SDCT Device to an individual?

Once the SCDT device information is transmitted to BEP's Proximity Trace Gateway Storage, DCF's OEHS and WCF's SOHB will use the device serial number and match it with the individual's name, employee/contractor ID number, and facility information which is maintained in a separate system database.

22. How did BEP mitigate the Program's privacy risks?

BEP performed a privacy threshold analysis to evaluate the information in the Program, and make the appropriate determination about how to manage and secure the information, as required by the Privacy Act and other federal statutes, regulations and Department of the Treasury's policies. DCF's OEHS and WCF's SOHB will provide the required Privacy Act statement detailing the internal and external information sharing uses prior to BEP employees and contractors obtaining the SDCT devices.

24. If we have received the COVID-19 vaccine are we still required to wear a SDCT device?

Yes.

25. When I am going to receive a SDCT device?

This is dependent upon the facility you work in. Precise details will be communicated to all employees and contractors in the future.

26. Will this be the only way you are going to capture this information or are you still going to do it the old way as well as a back-up if people don't wear them or the technology malfunctions?

The SDCT devices are a part of the contract tracing program. Additional steps including (but not limited to) interviews, camera reviews, badge reports will still be utilized.

27. Is the SCDT device safe to be worn by individuals with implantable cardioverter defibrillators (ICDs), pacemakers, or insulin pumps?

Yes, the SDCT devices are FCC compliant and safe.

Triax Technologies "TraceTag" product (SDCT device) has been previously approved by the FCC according to **FCC KDB 447498 Section 4.3.1a** (FCC Knowledge Database) specifically dealing with RF product safety near the body. Our FCC SAR (Specific Absorption Rate) Report, dated 8/6/2018, Test Report 317206D, Para 6.1 states that our product is exempt from SAR testing due to the low power nature of this product. This calculation and statement are predicated on proximity of 5mm or less and is not specific where on the body the product is worn as is consistent with the federal regulations.

28. Is the SCDT device okay to be turned off when at home?

Yes, however there is no need to turn the device off, the device will transition into a sleep mode if left undisturbed. If the device is turned off, employees and contractors are responsible for ensuring the devices are on while on BEP premises.

29. What are the safe operating conditions for the devices? Can I leave it in my car during the summer or winter?

The operating temperatures for the SDCT devices are Operating Temperature -4 – 140 degrees Fahrenheit (-20 – 60 degrees Celsius). Keep in mind that employees are responsible for security of device.

30. Are the wearable devices intrinsically safe?

The devices are not intrinsically safe and therefore should not be worn in areas where a concentration of ignitable vapors, gases or dust are known to be present. If you are unsure about whether concentrations exist, contact OEHS/SOHB.

31. How long will the policy be in effect?

Once the BEP enters Phase 3 of its reopening plan, senior leadership will assess the need to continue the use of the SDCT devices.



**DEPARTMENT OF THE TREASURY
BUREAU OF ENGRAVING AND
PRINTING WASHINGTON, D.C. 20228**

PRIVACY ACT STATEMENT

Pursuant to 5 U.S.C. § 552a (e)(3), this Privacy Act statement serves to inform you of the following concerning the collection of the information for Bureau of Engraving and Printing's (BEP or Bureau) Infectious Disease Social Distancing and Contact Tracing Program by the Office of Environment, Health & Safety in the District of Columbia Facility and the Safety and Occupational Health Branch in the Western Currency Facility:

AUTHORITY: Collection of the Social Distancing and Contact Tracing Device information is authorized by the Occupational Safety and Health Act (OSHA) of 1970, Public Law 91–596, Section 19(a) (29 U.S.C. 668(a)); 5 U.S.C. 301; Section 319 of the Public Health Service Act (42 U.S.C. 247d; American with Disabilities Act, including 42 U.S.C. 12112(d)(3)(B) (allowing medical examination after an offer of employment has been made to a job applicant), 29 CFR 602.14, 1630.2(r), 1630.14(b)(1), (c)(1), (d)(4); Medical Examinations for Fitness for Duty Requirements, including 5 CFR part 339; Executive Order 12196, 5 U.S.C. 7902(d); 29 U.S.C. 668, 29 CFR part 1904, 29 CFR 1910.1020, and 29 CFR 1960.66.

PURPOSE(S): Social Distancing and Contact Tracing Device information will be used to conduct real-time contact tracing and social distancing/proximity monitoring activities. By identifying and tracing contacts, BEP aims to identify individuals that pose health and safety risks to employees, contractors, and the general public, and assists public health officials in reducing the overall spread of infectious diseases such as the coronavirus disease 2019.

ROUTINE USE(S): Specific details as to the routine uses for this information are available under the System of Records Notice, Department of the Treasury.020 - Health Screening and Contact Tracing Records—Department of the Treasury, 86 Fed. Reg. 11381 (February 24, 2021). A hard copy of the list of routine uses is available upon request.

EFFECTS OF NOT PROVIDING REQUESTED INFORMATION: Employees and contractors working in a BEP facility for more than three days per pay period are required to wear a Social Distancing and Contact Tracing Device. Failure to wear and use a Social Distancing and Contact Tracing Device may subject you to disciplinary actions, including removal from federal service, for failing to cooperate.