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Tatjana Eby-Siddiqui, R.N.
Health Facilities Evaluator Manager I
CA Department of Public Health
Center for Healthcare Quality
1741 Technology Drive, Suite 160
San José, CA 95110

Re: Joint Letter from County of Santa Clara and RNPA Regarding Business and Professions Code § 680

Dear Ms. Eby-Siddiqui:

The County of Santa Clara (“County”) operates Santa Clara Valley Healthcare (“SCVH”), the second largest public healthcare system in the State of California, which serves a diverse population of 1.9 million Santa Clara County residents and the regional Bay Area through a network of 13 primary care clinics and three hospitals—Santa Clara Valley Medical Center, O’Connor Hospital, and St. Louise Regional Hospital. SCVH completed more than one million patient visits in 2023, with a significant portion of the patients served being uninsured or underinsured. The Registered Nurses Professional Association (“Association”) represents approximately 4,000 County-employed nurses who help make the delivery of this vital care possible.

The County and Association jointly submit this letter seeking clarification from the California Department of Public Health (“CDPH”) regarding practitioner name tag requirements provided for under California Business and Professions Code § 680 (“Section 680”). We respectfully request that CDPH answer the following questions:

1. Does a name tag that displays a healthcare practitioner’s first name (as opposed to first and last name) satisfy the requirement under Section 680 that a healthcare practitioner disclose “his or her name . . . on a name tag”?
2. For purposes of Section 680, does a “psychiatric setting” include any healthcare setting in which there is a high density of patients with psychiatric conditions (e.g., an emergency department or inpatient medicine unit), or is it more limited, such that it means only designated psychiatric units in acute care hospitals or free-standing psychiatric hospitals?

While County has taken myriad steps to enhance employee safety in recent years—including developing and implementing a workplace violence prevention plan; investing in numerous facility and technology improvements such as personal voice communication devices and upgraded security cameras and lighting; and training staff and developing a multi-disciplinary behavioral response team with the goal of creating best practices with regard to de-escalation and personal safety—issues persist, and the County and Association hope to continue their missions of ensuring the safety of County nurses and patients.

Pursuant to current practice, the County requires its nurses to wear name tags that display the nurse's first and last name. The County and Association would like to change this practice and give individual nurses the ability to choose whether their name tags display only the nurse's first name, as opposed to both their first and last name. Based on past incidents at County facilities, the County and Association believe that giving nurses the ability to display only their first name would reduce the likelihood of online stalking, uninvited contact via social media, and other forms of harassment—all of which may be precursors to violence. We note that first-name-only name tags is a safety best practice recognized by the federal Occupational Safety and Health Administration.¹ We also note that patients would not be significantly impacted by such a policy, as they would still be able to use name tags to learn the first names of nurses providing care, as well as access their own medical records to obtain additional information about their care and care team including the first and last name of all patient care providers.

The County and Association hope to protect employees in a lawful, meaningful manner, and we would greatly appreciate the CDPH's prompt guidance on the issues presented herein.

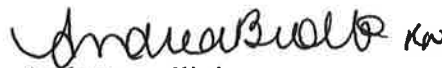
Very truly yours,



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¹ See "Guidelines for Preventing Workplace Violence for Healthcare and Social Service Workers," Occupational Health and Safety Administration | United States Department of Labor, OSHA 3148-06R 2016, p.21 (advising that employers should "provide staff with identification badges, *preferably without last names*, to readily verify employment") (emphasis added), available at <https://www.osha.gov/sites/default/files/publications/osh3148.pdf>.