



NUMBER	EMS 110
TITLE	Body-worn Cameras
CATEGORY	OPERATIONS
APPROVED BY	Board of Supervisors
EFFECTIVE DATE	2026-08-04
ORIGINATION & REVISION DATES	2026-08-04

PURPOSE

To establish guidelines for the use of body-worn cameras (BWCs) by EMS field personnel to enhance provider safety, improve accountability, support quality improvement and training, and promote transparency in interactions with the public.

GUIDELINE

Cedar County EMS has adopted the use of Motorola V700 body-worn cameras as the standard body-worn recording device. These devices are intended to visually and audibly document patient encounters and operational activities in real-time. When used appropriately, BWCs serve the following nonexhaustive list of functions:

- a. Enhance the safety of EMS personnel during field operations.
- b. Promote accountability and professionalism among EMS practitioners.
- c. Capture and preserve evidence of illegal, unsafe, or unprofessional conduct by any person present at a scene.
- d. Record compliance with, or deviation from, department protocols and procedures.
- e. Document interactions with patients, family members, bystanders, and other public contacts.
- f. Support the resolution of complaints or allegations involving EMS personnel.
- g. Contribute to continuous quality improvement and field training evaluations.
- h. Provide realistic material for scenario-based education and training.
- i. Serve as a resource in legal proceedings, administrative inquiries, or other disputes.

DEFINITIONS

1. Body-worn Camera – BWCs are the audio-video recording devices approved for use by authorized CCEMS personnel.
2. VideoManager EL – A secure, web-based digital evidence management platform provided by Motorola. This system stores encrypted media and data, accessible based on individual user permissions.
3. Agency Administrator – A designated system administrator responsible for managing the BWC program. This individual has full access to user permissions, system settings, and all administrative functions within VideoManager EL. For continuity of operations, a backup administrator or designee may also be designated.
4. SmartControl – A mobile application that allows authorized users to view a list of videos currently stored on the BWC and review playback directly from the device. The application also enables live streaming from the camera to assist with field-of-view adjustments. It does not save or store video on the smart device itself.
5. Transfer Station – A docking station used to recharge the body-worn cameras and upload captured media to Video Manager EL.



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6. Media or Data – Includes any digital images, audio recordings, or video footage captured by a BWC device.
7. Redaction – The process of digitally obscuring or removing audio or visual information from BWC media or data to comply with HIPAA or other privacy/confidentiality requirements.

ASSIGNMENT, USE, AND TRAINING

All BWC devices shall be assigned by the Agency Administrator in accordance with the priorities established in this SOG and based on the availability of operational units in the department's inventory. BWC devices may be directly assigned to an individual (e.g., command staff) or assigned to a pool which individual providers will select from each shift.

Field personnel are required to always wear an energized BWC while on duty, except while in the station. Administrative personnel should, whenever possible, wear an energized BWC any time they are involved in an EMS response but may wear and utilize a BWC at other times.

All personnel authorized to operate BWC equipment are required to complete mandatory departmental training to ensure they are familiar with the audio/video recording system and fully understand all related departmental policies and procedures before use.

GENERAL OPERATION

BWCs may only be worn while on duty and only by qualified and approved users. Qualified users shall don and power on their BWC at the beginning of each shift and shall properly turn off and store the device in accordance with established procedures at the conclusion of their shift.

Qualified and approved employees are required to use BWCs for all field operational activities, including special assignments, special event coverage, and public interactions. BWCs may also be authorized for use during department-approved training sessions, performance improvement plans, field training activities, and other approved departmental business or operations.

At the end of the shift, BWCs shall be placed into an available slot on the Transfer Station located in the station. This process enables both the recharging of the device and the automatic upload of media and data to VideoManager EL. Docking and uploading may also be requested at other times if administration determines the need for earlier access.

Once the upload and recharge cycle is complete, all previously recorded data will be automatically cleared from the BWC device. The BWC shall not be removed from the dock until both of the following conditions are met:

- All media and data have been successfully uploaded.
- The battery is fully recharged or replaced.



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BWC Modes of Operation **Update once hardware is finalized**

Ready (Pre-Event Capture) Mode: Device feature through which the camera continuously records and holds the most recent 15 seconds to 2 minutes of video and optionally audio prior to event activation. With this feature, the initial event that causes the provider to activate recording is likely to be captured automatically, thereby increasing the capability of recording the entire activity. Pre-event buffering does not occur when the camera is powered off.

Recording (Event Capture) Mode: In this mode, the BWC device saves the buffered video and continues recording audio and video for up to 12 hours or the life of the battery, whichever is less. To activate, the end-user must double-press the Record Start/Stop button located at the center of the BWC device (an audible tone will sound to alert the end-user that the device is now recording). To stop recording, the end-user must double-press the Record Start/Stop button to return to the Pre-Event Buffering Mode.

The BWC provides visual LED indicators to communicate device status. Personnel should be familiar with the following LED behaviors:

- Solid Green LED – Camera is in a ready/buffering state
- Solid Red LED – Device is recording
- Flashing Red LED – Hardware or system error
- No LED – Device is powered off

ACTIVATION AND DEACTIVATION

The BWC shall be activated upon arrival at the scene, prior to exiting the vehicle, on any call for service where there is a patient or potential for a patient. The BWC must then remain recording for the duration of the call, and until there is clear termination of CCEMS responsibility, unless directed otherwise within this SOG.

Additionally, the BWC shall be activated at the beginning of any on-duty patient encounter, whether dispatched or not, and must remain recording for the duration of the encounter.

BWCs should also be activated during non-dispatch incidents when the provider believes the interaction is significant, poses a perceived threat, or involves material information related to an incident. Examples include:

- A citizen contact where the provider feels threatened.
- A citizen statement relevant to a case (e.g., at the hospital after care is transferred).
- Encountering an unreported medical scene.
- Witnessing an incident or accident requiring EMS response.
- Any other contact where the provider believes it would be appropriate or valuable to record an incident.

Once the BWC system is activated, it shall remain recording until under the following conditions:

- After patient care has concluded in the field
- After canceling a call for service or other formal termination of EMS involvement



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- Upon crossing the threshold into a hospital emergency department, if the hospital does not permit recording devices, except:
 - During the direct transfer of care to hospital personnel, if expressly allowed by hospital staff.
 - When there is an immediate danger or a critical incident posing a threat to the life safety of the crew or patient.

At no time is a provider expected to jeopardize his/her safety to activate the BWC; however, the BWC should be activated in situations described above as soon as reasonably practicable.

PRIVACY AND RECORDING RESTRICTIONS

All recordings made by personnel on any department-issued BWC, and any recording made on a BWC while acting in an official capacity, shall remain the property of Cedar County EMS. Providers shall have no expectation of privacy or ownership interest in the content of the BWC recordings.

Although Iowa is a one-party consent state, providers assigned a BWC should inform patients and individuals in the patient treatment area that they are being recorded. As one of the purposes of the BWC is to enhance provider safety, the BWC shall remain on for the duration of the patient encounter; however, providers may pause recording if the provider wearing the BWC must tend to a personal issue for which, in routine circumstances, they would have a reasonable expectation of privacy (e.g., using the restroom, changing clothes).

The BWC shall not be activated in locations where individuals have a reasonable expectation of privacy, such as locker rooms, dressing rooms, or restrooms, unless a medical call for service occurs in these areas. In such cases, reasonable effort should be made to protect the privacy of the patient and others present in the immediate treatment area in compromised positions.

BWCs shall not be activated inside a hospital facility that prohibits recording, unless there is an immediate danger or a critical incident posing a threat to the life safety of the crew or patient.

At no time shall a BWC be powered off during a patient encounter or while on a call for service involving patients or potential patients. The BWC must remain operational and ready for immediate activation in the event of an emergency.

PROHIBITED CONDUCT

Use of a BWC for any purpose outside the authorized uses described above is strictly prohibited. Unauthorized use may result in disciplinary action, up to and including termination, and may also constitute a violation of applicable state or federal privacy laws.

The BWC shall not be used to intimidate, threaten, or discourage any individual from observing EMS activities, making appropriate inquiries of EMS personnel, or filing a complaint.



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The BWC shall not be intentionally activated to record conversations with fellow employees during routine, non-call-for-service activities without their knowledge.

Any attempt to circumvent department BWC procedures, violate an individual's reasonable expectation of privacy, or engage in any unlawful or prohibited conduct involving BWC use, shall be grounds for disciplinary action, up to and including termination.

No video shall be altered or deleted by the BWC user. Unauthorized alteration or deletion is strictly prohibited and subject to discipline and possible civil/criminal charges.

DATA ACCESS AND SECURITY

All authorized users are only authorized to review BWC media or data of their own recorded patient encounters and solely for County operational or HIPAA-approved purposes, such as clinical review, documentation accuracy, or quality assurance.

All authorized users are responsible for safeguarding their VideoManager EL login credentials. Credentials shall not be shared with any other individual under any circumstances. Additionally, personnel must ensure that any computer used to access VideoManager EL or device using SmartConnect is not left unattended while logged in.

All authorized users are responsible for maintaining the security and accountability of their assigned BWC equipment, as well as any platforms used to store or view BWC media or data. Any loss of equipment or suspected compromise of secure data storage systems shall be reported immediately to the immediate supervisor and the Agency Administrator.

EMPLOYEE RESPONSIBILITIES

Each authorized user is responsible for the general care, proper operation, and routine inspection of their assigned BWC equipment. All devices shall be used in accordance with manufacturer guidelines, departmental training, and applicable CCEMS SOGs. Responsibilities include, but are not limited to, the following:

- **Pre-Shift Inspection:** Prior to beginning each shift, the assigned employee shall inspect their BWC to ensure it is functioning properly and in accordance with departmental training. If any malfunction or irregularity is identified, the device shall not be used.
- **Proper Placement and Field of View:** Providers shall ensure the BWC has an unobstructed field of view at all times. The device shall be worn at chest height, facing forward, and positioned horizontally to the ground. Clothing or uniform accessories shall not obstruct the lens.
- **Reporting Malfunctions and Securing Replacements:** Any damaged or malfunctioning BWC equipment shall be reported immediately to the immediate supervisor and the Agency Administrator. A reasonable effort shall be made to secure a functioning and fully charged replacement BWC before the provider resumes service. If no replacement device is available, the shift supervisor shall document the unavailability in the daily shift report.



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- **Reporting Loss or Theft:** The loss of, or suspected theft of BWC equipment must be reported immediately to the immediate supervisor and the Agency Administrator. The report shall include a written explanation of the suspected cause of equipment failure and any corrective action taken in cases of suspected misuse. All lost or stolen BWCs or accessories must be documented in an incident report and accompanied by a law enforcement report submitted by the end of the provider's tour of duty.
- **Notification of Potential Complaints:** If a provider believes that a recorded event may lead to a complaint or formal review, they shall notify their immediate supervisor as soon as possible.

SUPERVISOR RESPONSIBILITIES

Supervisors play a critical role in ensuring compliance with the BWC guidelines. They are responsible for monitoring proper use, addressing equipment issues, and overseeing the documentation and review of BWC-related incidents. Responsibilities include, but are not limited to, the following:

- **Guideline Compliance Oversight:** Supervisors shall ensure that employees are wearing and activating their assigned BWC in accordance with this guideline. This includes verifying that devices have not been left in the dock by on-duty personnel and observing activation of BWCs upon arrival at scenes when the supervisor is present with the employee.
- **Malfunctioning Equipment:** Supervisors shall ensure that any employee assigned a malfunctioning or non-functioning BWC obtains a replacement device before responding to any calls for service, except in the case of a call for service requiring an emergency mode response. Replacement devices may be obtained from the Agency Administrator.
- **Complaint-related Video Review and Documentation:** If a department member activates their BWC in response to a citizen complaint or an incident involving a member of the public, the supervisor shall request access to the video from the Agency Administrator, review the media or data, and initiate any necessary follow-up investigation (see the *Administrative Review of BWC Media or Data* section of this SOG). If the incident does not warrant an incident report or supplemental report, the details of the interaction shall still be documented via departmental email.

AGENCY ADMINISTRATOR RESPONSIBILITIES

The Agency Administrator is responsible for managing the BWC program and has full access to user permissions, system settings, and all administrative functions within VideoManager EL. Responsibilities include, but are not limited to, the following:

- Creating user accounts and assigning access levels based on employee roles and duties
- Maintaining and tracking the inventory of all Motorola BWC equipment
- Issuing and inspecting BWC equipment upon initial assignment to personnel
- Reporting non-functioning BWC systems in writing, via departmental email, to the EMS Director, if different than the Agency Administrator
- Performing redaction of video media or data as needed to comply with privacy laws and departmental guidelines



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- Managing and granting access to video media or data requested by department personnel or third-party entities, in accordance with this guideline and in compliance with applicable laws and internal procedures.

MEDIA & DATA RETENTION

All media captured by the BWC shall be uploaded via the Transfer Station at the conclusion of each shift to VideoManager EL and shall remain the sole property of Cedar County EMS (CCEMS).

BWC media or data is not included as part of any electronic health record (EHR). Media or data may be treated as part of the CCEMS quality improvement/peer review process as required by IAC 641–132.3(7) and protected under Iowa Code § 147.135.

Unless an exception applies, each BWC video/audio record will be purged 750 days after the event is recorded. Retention is automatic based on assigned categories unless an Agency Administrator manually selects a longer retention period.

Media or data related to the following may be maintained indefinitely:

- Any call that is associated with a complaint by a patient, family member, the public, or an outside healthcare provider.
- Any call that is subject to a litigation hold.
- Any call that requires the patient to be restrained or placed in protective custody by law enforcement.
- Any call that presented a challenge to the crew regarding patient care or equipment operations that resulted in injury or death to crew members or the patient, and or damage to equipment.
- Any call where there may be a prolonged law enforcement investigation based on alleged or charged crimes or civil action.
- Any call marked for retention by a crew member.
- Any call marked for retention by CCEMS administration.

A BWC video/audio record requested by subpoena, court order, search warrant, or with potential relevance to a crime, will be maintained indefinitely until final disposition is made by a court of law or the request is fulfilled and no longer needed.

USER ACCESS TO RECORDED MEDIA OR DATA

Although BWC media or data is not considered part of a medical record, it may contain Protected Health Information (PHI) and is therefore should be treated as subject to HIPAA protections under 45 CFR Part 164, Subpart E. Cedar County HIPAA Policies and Procedures will apply.

Employees who have been assigned a BWC device may review their own recordings via SmartConnect to ensure accuracy when completing the patient electronic health record (EHR). Employees may also review their own past uploaded recordings via VideoManager EL. Employees will only have access to their own recordings



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and may only access media or data for permitted reasons. Requests to view related recordings from the same call for service would fall under Administrative Review of BWC Media or data below.

Field training officers and preceptors may use captured BWC media to review media or data with trainees and providers directly involved in the patient's care immediately following the encounter. This review may be conducted for real-time training, quality improvement, or to assist with completion of the EHR using SmartConnect, or via VideoManager EL if the video has been uploaded. Only personnel involved in the patient's care may view the media or data, and each employee would need to individually access their respective recordings; otherwise, FTOs and preceptors may follow the procedure for *Administrative Review of BWC Media or Data* below.

BWC media or data may be shared with Emergency Department staff via SmartConnect to support or improve patient care. Reasonable efforts shall be made to protect patient privacy—such as limiting shared media or data to relevant segments—provided these efforts do not interfere with the delivery of care. In such cases, patient care takes precedence over privacy concerns.

EMS staff may request access to review relevant media or data from a call for service to which they do not otherwise have access (e.g., BWC media or data from other providers on scene) in conjunction with preparing for a deposition or trial. This request must be in writing and must include all supporting documentation, such as a court subpoena, legal notice, or an email from legal counsel.

All other access falls under *Administrative Review of BWC Media or Data* below.

ADMINISTRATIVE REVIEW OF BWC MEDIA OR DATA

Because BWC recordings may contain Protected Health Information (PHI) and to maintain trust with CCEMS staff, access to and viewing of media or data on VideoManager EL must be strictly controlled. This ensures the protection of patient privacy and preserves the integrity of the BWC program.

All access is automatically tracked by VideoManager EL.

Those involved in the agency's continuous quality improvement (CQI) program may access media or data as part of the CQI review process. CQI reviewers are only permitted to access media or data related to a run which they are assigned for review.

In addition to those calls falling under CQI review, CCEMS administration may access media or data for the following reasons:

1. **Use-of-Force or Threat Incidents** – Any call involving a combative patient, intoxicated individual, individual under the influence of drugs, or patient restraint, including attempted or actual assault/battery on EMS personnel.
2. **Critical or Complex Medical Events** – Any High Acuity-Low Occurrence (HALO), high risk, mass casualty incident (MCI), pre-hospital blood administration, or other significant or unusual trauma/medical event that may offer value for training and/or system improvement.



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Additionally, access to BWC media or data may be requested to respond to complaints, as part of a formal investigation/inquiry process, or personnel performance/discipline processes. Efforts should be made to resolve complaints, investigations, or personnel matters without relying on BWC media or data. Use of BWC recordings should be considered a last resort. All requests made under for the following reasons must be accompanied by a written statement from the individual with any supporting documentation:

1. **Patient or Family Complaints** – In response to complaints or allegations of misconduct, neglect, or other concerns raised by a patient or their family.
2. **Public, Peer, or Bystander Complaints** – When complaints or allegations of misconduct or neglect are submitted by the general public, peers, or bystanders.
3. **Formal Administrative or Clinical Review** – Any call that requires formal review for clinical or operational investigation/inquiry as deemed necessary by the Medical Director, EMS Director, or EMS Operations Supervisor.

While BWC media or data should primarily serve as a tool for education, training, and coaching, CCEMS maintains the right to initiate formal disciplinary action when media or data reveals:

- Violations of federal, state, or local laws.
- Willful harm to or neglect of a patient.
- Egregious, unprofessional, or dangerous behavior.

All other performance issues that do not rise to that disciplinary level should be addressed through non-disciplinary counseling and, if necessary, escalated in accordance with CCEMS progressive disciplinary processes.

All requests to access BWC media or data must be submitted via the **BWC Media or Data Review Request** form located in the online Forms repository in Vector Scheduling. Once completed, the form will be routed via email to the Agency Administrator. Each request must include the call number, approximate on-scene time, and the location of the incident.

Unless otherwise permitted by Cedar County HIPAA Policies and Procedures, all BWC media or data must be redacted before access is granted. Redaction includes the removal of Protected Health Information (PHI), and other confidential or sensitive content as determined by the County Attorney.

Redaction is performed using VideoManager EL tools or equivalent secure software. All media or data is shared exclusively through VideoManager EL's secure sharing portal, unless otherwise compelled by a court order or search warrant. Downloadable copies of media or data are provided only when explicitly required by a valid court order or search warrant.

THIRD PARTY ACCESS AND RELEASE OF BWC MEDIA OR DATA

As a covered entity under HIPAA, CCEMS is committed to protecting Protected Health Information (PHI) and will only disclose BWC media or data when permitted or required by law:



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1. Patient Request

- a. BWC media is not considered part of a patient's medical record and is not releasable through standard medical records procedures.
- b. All such requests will be denied in writing within ten (10) business days, advising the requestor to submit a legally binding subpoena, court order, or search warrant.

2. Public Records Request

- a. BWC media or data containing PHI and is not releasable through public records requests, pursuant to Iowa Code § 22.7 and HIPAA (45 CFR § 164.512).
- b. All such requests will be denied in writing within ten (10) business days, with a response citing HIPAA and advising the requestor to submit a legally binding subpoena, court order, or search warrant.
- c. BWC media or data otherwise subject to a public records request shall be reviewed by the Agency Authority, County Attorney, or designee for confidentiality under Iowa Code § 22.7, and provide full, partial, and/or redacted responsive records consistent with Iowa Code Chapter 22.

3. Subpoena

- a. A subpoena alone is not sufficient to compel the release of Protected Health Information (PHI). In accordance with 45 CFR § 164.512(e), a covered entity may only disclose PHI in response to a subpoena if the patient has signed a valid HIPAA authorization, or if it receives satisfactory assurance that the patient has been given notice of the request and has had an opportunity to object, or that reasonable efforts have been made to secure a qualified protective order.
- b. Any BWC media or data released in response to a subpoena will be redacted to remove PHI and other confidential or sensitive information unless the subpoena is accompanied by a valid court order authorizing the release of unredacted content (see *Court Order* section).

4. Court Order

- a. Under 45 CFR § 164.512(e)(1)(i), PHI may be disclosed without patient authorization when a court order specifically directs the release of records.
- b. A valid court order issued by a judge will require for the release of BWC media or data. The court order must clearly specify the scope of the media or data requested, including details such as the date, incident, and involved personnel.
- c. Unless the order explicitly requires redaction, the media or data will be released unredacted and may include a downloadable copy.

5. Search Warrant

- a. Under 45 CFR § 164.512(f)(1)(ii)(A)-(B), a search warrant issued by a judge authorizes a covered entity to disclose PHI without the patient's consent or additional notice.
- b. A valid search warrant requires the release of all specified BWC media or data in its unredacted form, including a downloadable copy, unless the warrant itself explicitly imposes limitations or requires redaction of PHI.

All requests for BWC media or data, including subpoenas, court orders, and search warrants, will be reviewed by the Agency Administrator and the County Attorney to verify the authenticity of the request, the scope of the information sought, and compliance with HIPAA, Iowa Code Chapter 22, and applicable Iowa laws.

For each verified request, a case will be created in VideoManager EL, and the corresponding documentation (such as the subpoena, court order, or search warrant) will be uploaded to the case file.



CEDAR COUNTY EMS STANDARD OPERATING GUIDELINES

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All responses will be fully documented, including the date of release, the recipient, and the format of the media or data provided (e.g., redacted or unredacted, view-only or downloadable).