

June 25, 2020

Secretary Mark Ghaly, MD, MPH
California Health and Human Services Agency
1660 Ninth Street, Room 460
Sacramento, California 95814

Dear Dr. Ghaly,

As Co-Chairs of the Covid-19 Racial Disparities Task Force in Oakland, we are writing to you with concerns that have been raised regarding the Verily testing platform that the State has been using for its community test sites.

As you are aware, like many counties across the state and country, we are seeing large disparities in the effects of Covid-19 within our community. [Recent data from the Alameda County Department of Public Health](#) shows that our Latinx population has a case rate that is 5 times higher than that of Whites, while our African-American/Black population faces a death rate that is more than double that of Whites. The Covid-19 Racial Disparities Task Force seeks to address these racial health disparities in Oakland.

Our Task Force members and Affiliate partners (see list attached) which includes a broad network of health providers, including community clinics and CBOS, have raised a number of issues with the current testing platform supported by your agency. Please see below for an outline of the challenges and recommendations to both address the challenges and improve access for vulnerable communities. Furthermore, while Verily can honestly say they have not shared data outside of their stated guidelines, there is no accountability for third party use, sale or other monetization of data that is being disproportionately collected in low resource communities and communities of color.

Challenges

Accessibility of Platform

Currently, the platform does not have an option to allow less tech-savvy users to make an appointment over the phone. Even if testing partners were able to hire a call center to manage calls, the platform requires the user directly input information (and not have information be inputted on their behalf, like we've seen with other platforms like Microsoft and the National COVID Testing Platform). This was [documented in an article on testing in San Francisco](#). In addition, the platform is only available in English and Spanish. The City of Oakland has residents who speak other languages, including Chinese, Vietnamese, Arabic, Tagalog, Khmer, and Korean. Additionally, patients only receive calls if they are COVID-19 positive. If a patient receives a negative test, the only way for the user to access their results is online through the Verily platform.

Data Security and Community Trust

It is critical in this crisis that we continue to build trust between government and healthcare providers and vulnerable communities. The platform requires users to have a Google account in

order register for an appointment and receive results. Some users are concerned about surveillance and access to their data. The platform requires a sign off of two lengthy privacy policies in order for users to register for an appointment. Per the privacy policies, personal data can be shared with “Verily’s contractors... the entity that is operating the site and its contractors, the state Department of Public Health and potentially other federal, state, and local health authorities, and other entities that assist with the testing program.” This exposes vulnerable community members to widespread sharing of personal data that could be used for commercial or other purposes.

Operational Challenges

After being assured that Verily could support a pedestrian-only site, the City of Oakland opened the Roots Community Clinic site on May 8th. For four weeks (until June 1st), the Verily website stated that the site was for drive thru appointments, which led to patients arriving to the Roots Community Clinic site expecting drive thru service (which cannot be accommodated). Same day appointments options are ideal but are difficult because of the length of the Verily registration process.

Additionally, for the first 711 Verily registrations from the Allen Temple and Roots Community Clinic sites, the race and ethnicity question has a “Not Reported” response for 76% of the respondents, which seems inconsistent with all other City and Roots surveys. It’s also noted that many of those registered on Verily are coming from communities outside of the adjacent zip codes.

Recommendations

Disaggregate Verily’s provision of PPE and tests from the platform – For sites that do not work well with the platform (i.e. pedestrian only sites), we request that the State continue to provide PPE and tests without requiring the use of the platform.

Ensure private data is protected – do not put individuals’ personal data at risk and create further mistrust of government among vulnerable communities.

Ensure testing platforms are flexible and accessible – This includes supporting multiple languages, multiple ways of intake (i.e. phone or online appointments), multiple types of appointments (onsite/same day or in advance) and a platform that is easily modified.

Consider use of a free, open-source appointment and data management platform – The City of Oakland and County of Alameda are partnering on a pilot of the National Testing Data Response platform, which was designed by [Alliance for Innovation](#), and is currently being used in [Tarrant County](#) (TX) and in San Jose.

In addition, we would also like to offer the following recommendations to better serve our most-impacted communities:

1. **Provide more direct support to community health clinics** - community health clinics already have relationships with their local community and should be directly supported (with funding and supplies) to expand their testing efforts. Community health institutions like Roots provide linkage to care and wraparound services that are critical for more vulnerable patients.
2. **Direct Resources Based on Need** - In addition to numbers of tests conducted, the percent positive rate per site should be used to identify where testing is most needed and where resources should be diverted.

Thank you for your support. We look forward to engaging with you further as we continue to identify ways to address the racial disparities in our community.

Sincerely,

Mayor, Libby Schaaf, City of Oakland,

Alameda County Supervisor Wilma Chan

Assemblymember Rob Bonta

Dr. Anthony Iton

Co-Chairs of Oakland's Covid-19 Racial Disparities Task Force