

## Implementation Table City of Seattle

### INSTRUCTIONS

Please provide the most current status using one of the categories listed below and a brief comment supporting the status for each recommendation.

### Implementation Status Categories:

**Implemented:** recommendation was fully implemented.

**Underlying Issue Addressed:** Agency addressed underlying issue differently than suggested, but satisfies concerns raised.

**In progress:** Continuing action toward complete implementation.

**Partially implemented:** Recommendation is implemented in part, but no ongoing efforts toward full implementation.

**Not implemented:** Recommendation not implemented at all.

**Not applicable:** Changes in legislation or other circumstances made implementation irrelevant or unnecessary.

**Overarching Recommendation 1: We recommend that entities institute as many elements as possible from the best practices in this report and the Washington Attorney General’s model rules regarding paper and electronic records.**

Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	As part of the review and approval of Ordinance 122969, expanding the Seattle Municipal Code existing sections on public records requests, the City specifically evaluated where the existing code authority needed to be updated in relationship to the Attorney General’s Model Rules. The Ordinance (attached) requires each City department to adopt administrative procedures for providing access to public records in accordance with the provisions of RCW 42.56. These procedures will be made available in each department and on their respective websites. We believe that these procedures, coupled with existing practices, reflect relevant model rules applicable to the City of Seattle	In progress	In progress

**Overarching Recommendation 3: We recommend entities consider tracking costs associated with responding to requests as a tool that management can use to determine appropriate levels of staffing and resources.**

Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, this ordinance requires all City departments to track staff costs associated with fulfilling requests for public records.	In progress	In progress
<b>Recommendation 1a: We recommend that entities follow the Attorney General’s model rules and the best practices identified in this report to the fullest extent possible, particularly in regard to the following: Establish and follow processes to ensure that all requests are received.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, each City departments shall adopt, by rule, administrative procedures that assign a central point of contact to receive requests and adopt a system that informs a requesting party of the amount of time needed to respond to the request, a reasonable estimate of when responsive records would be available and, if applicable, the reasons why a requested record was not made available..	In progress	In progress
<b>Recommendation 1c: We recommend that entities follow the Attorney General’s model rules and the best practices identified in this report to the fullest extent possible, particularly in regard to the following: Refrain from redirecting requestors to another department within the same entity or requiring requestors to initiate a “new” request within the same entity.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	To complement the requirements detailed in Ordinance 122969, City departments have adopted a best practices policy that prohibits this activity.	In progress	In progress
<b>Recommendation 1d: We recommend that entities follow the Attorney General’s model rules and the best practices identified in this report to the fullest extent possible, particularly in regard to the following: Avoid the use of e-mail filters that result in the entity rejecting or overlooking public records requests. See related Finding No. 2.</b>			

Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	The Legislative Department utilizes the Postini, SPAM, Virus, and content e-mail service. Instead of deleting suspect e-mail, Postini quarantines the e-mail, allowing the user to review its contents in a secure viewer. This feature eliminates the potential of blocking legitimate e-mails. The Department further follows a policy of converting all requests to PDF, including requests received via e-mail, fax or US mail upon receipt and directly forwarding them to the PRO. Verbal requests are also PDF upon being memorialized and confirmed with requestor.	In progress	In progress
<b>Recommendation 1e: We recommend that entities follow the Attorney General’s model rules and the best practices identified in this report to the fullest extent possible, particularly in regard to the following: Review responses and communicate with requestors to ensure the records to be provided are consistent with the request.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, each City departments shall adopt, by rule, administrative procedures to informs a requesting party of the amount of time needed to respond to the request, a reasonable estimate of when responsive records would be available and, if applicable, the reasons why a requested record was not made available. This exchange will likely be used to confirm the extent of any request.	In progress	In progress
<b>Recommendation 2a: Establish policies that are consistent with the Public Records Act, using the Attorney General’s model rules as a guide.</b>			

Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	In preparing Ordinance 122969, the City evaluated its existing public records ordinance to determine which model rules had been implemented. This ordinance is designed to implement, where feasible or applicable, the remaining Model rules.	In progress	In progress
<b>Recommendation 2b: Conduct broad staff training on the Public Records Act.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	City departments have ongoing training with those employees responsible for responding to requests for public records.	In progress	In progress
<b>Recommendation 2d: Select and set e-mail filters at a level that will not block public records requests.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	See response to Recommendation 1d, above	In progress	In progress
<b>Recommendation 2f: Develop a policy that clearly outlines how public records requests can be accepted and make that policy readily available to the public.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, each City departments shall adopt, by rule, administrative procedures for providing access to public records in accordance with the provisions of RCW 42.56. Prior to adopting this	In progress	In progress

	Ordinance, the Legislative branch had developed a form for submittal of requests that is available on the department's website. The form is also available at the legislative department's offices.		
<b>Recommendation 3a: Provide comprehensive training and resource materials on legal exemptions to staff who respond to records requests.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	See response to Recommendation 2b above	In progress	In progress
<b>Recommendation 3c: Inform requestors about their rights to appeal the entity's denial of all or part of their records request and the process available to them to appeal the denial</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, this ordinance requires all City departments to adopt a Rule outlining the steps for submitting an appeal of a record request denial.	In progress	In progress
<b>Recommendation 4b: Use e-mail to respond to public records requests whenever possible.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):

Implemented	<p>On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, this ordinance requires all City departments to develop procedures for (a) an internet-based approach that allows for a single step on each departmental website to submit a request for public records; (b) areas for the public to access frequently requested records, and (c) for records to be made available to requesters who request documents in electronic formats.</p> <p>In addition, the notification of a request for public records and providing said records is general department practice, assuming a requester has provided an email address and is willing to accept records electronically</p>	In progress	In progress
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**Recommendation 4c: Explore opportunities for providing records electronically.**

Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	<p>On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, this ordinance requires all City departments to develop procedures for (a) an internet-based approach that allows for a single step on each departmental website to submit a request for public records; (b) areas for the public to access frequently requested records, and (c) for records to be made available to requesters who request documents in electronic formats.</p>	In progress	In progress

**Recommendation 4d: Provide training for staff on processing public records requests.**

Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):

Implemented	See response to recommendation 2b, above.	In progress	In progress
<b>Recommendation 4e: Provide cross-training to other staff to prepare them for acknowledging and responding to requests.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	See response to recommendation 2b, above.	In progress	In progress
<b>Recommendation 4f: Provide records in installments.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
Implemented	It is city policy to provide records in installments for large requests to provide the requestor an opportunity to begin reviewing requested records in a timely manner.	In progress	In progress
<b>Recommendation 4g: Consider waiving copying charges for small records requests.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, this ordinance requires all City departments to adopt a Rule outlining where copying costs can be reduced or waived.	In progress	In progress

<b>Recommendation 4h: We recommend entities review their public records requests processes to identify and eliminate those elements that may delay providing records. Specifically we recommend entities: Engage in ongoing communication with the requestor about priorities and timelines when a request is identified that may take some time to fill.</b>			
Most Recent Implementation Status:	Comments Supporting Implementation Status:	Net Realized Cost Savings (If Applicable):	Period Over Which Cost Savings Were Realized (If Applicable):
In progress	On April 24, 2009 Seattle City Council passed Ordinance 122969. Beginning in November 2009, this ordinance requires all City departments to adopt administrative procedures to inform a requesting party of the amount of time needed to respond to the request, a reasonable estimate of when responsive records would be available and, if applicable, the reasons why a requested record was not made available;	In progress	In progress