2022 Annual Surveillance Technology Usage Review

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2022 Annual Surveillance Technology Usage Review

Report Highlights

Background

This 2022 Annual Surveillance Technology Usage Review includes the following technologies:

- Seattle Department of Transportation Closed Circuit Television Cameras
- Seattle Fire Department Computer-Aided Dispatch
- Seattle Fire Department Hazardous Materials and Emergency Scene Cameras
- Seattle City Light Current Diversion Technologies

What We Found

We found that departments are complying with Seattle Municipal Code 14.18.060 or working on implementing recommendations from previous audits to bring the surveillance technologies into compliance.

Department Response

The Seattle Department of Transportation, the Seattle Fire Department, and Seattle City Light reviewed the report and had no comments.

WHY WE DID THIS AUDIT

Seattle Municipal Code 14.18.060 requires the City Auditor to annually review City Council-approved surveillance technologies used by City of Seattle departments, excluding the Seattle Police Department.

HOW WE DID THIS AUDIT

To accomplish the audit's objectives, we:

- Reviewed usage data for compliance with Seattle Municipal Code 14.18.060
- Reviewed relevant Surveillance Impact Reports
- Interviewed City officials
- Reviewed cost data
- Reviewed customer inquiry data
- Reviewed the status of the recommendations from our previous audits

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INTRODUCTION

Background and Overview

Seattle Municipal Code (SMC) 14.18 requires City of Seattle (City) departments to obtain City Council approval of their surveillance technologies acquisition through a Surveillance Impact Report (SIR). SMC 14.18 resulted from concerns about privacy, the lack of a process for the City's acquisition of surveillance technologies, and the risks that such technologies could pose to civil liberties related to privacy or freedom of speech or association or have a disparate impact on specific groups through over-surveillance.

SMC 14.18.060 requires the City Auditor to annually review the surveillance technologies used by all City departments, except for those used by the Seattle Police Department, which are reviewed by the Inspector General for Public Safety.

The City Auditor produces an initial audit report for each City Council-approved surveillance technology to determine whether it has been used in compliance with applicable provisions of the Seattle Municipal Code. After initial surveillance technology reviews, the City Auditor will report on its annual reviews of technologies in a single Annual Surveillance Technology Usage Review report.

This 2022 Annual Surveillance Technology Usage Review includes:

- Seattle Department of Transportation (SDOT) Closed Circuit Television (CCTV) Cameras
- Seattle Fire Department (SFD) Computer-Aided Dispatch (CAD)
- Seattle Fire Department (SFD) Hazardous Materials and Emergency Scene Cameras
- Seattle City Light (SCL) Current Diversion Technologies

Our objectives were to report on:

A. How the surveillance technology has been used, how frequently, and whether usage patterns are changing over time

B. How often the surveillance technology or its data are being shared with other entities, particularly other governments

C. How well data management protocols are safeguarding individual information

D. How deployment of the surveillance technology impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations, and how those impacts are being mitigated

E. A summary of any complaints or concerns received by or known by departments about the surveillance technology and the results of any internal audits or other assessments of code compliance

F. Total annual costs for use of the surveillance technology, including personnel and other ongoing costs

This review covers the surveillance technologies usage from January through December 2022.

The audit team for this project included IB Osuntoki, Marc Stepper, and Melissa Alderson.

SEATTLE DEPARTMENT OF TRANSPORTATION CLOSED CIRCUIT TELEVISION CAMERAS

Technology Description

Closed Circuit Television (CCTV) cameras are Seattle Department of Transportation (SDOT) remotely controllable video cameras installed on traffic poles along major roads in Seattle. The SDOT Transit Operations Center uses CCTV cameras to monitor traffic conditions and quickly respond to traffic issues. Other City departments use CCTV cameras to respond to emergencies and to monitor major city-wide events. The cameras provide live video or updated static images 24 hours a day on the Traveler Information Map, a website that displays real-time traffic conditions in Seattle. See our initial CCTV audit for more detailed information on the CCTV system.

Source: Seattle Department of Transportation Traffic Cameras Fact Sheet

SDOT has implemented all the recommendations from our previous review (see Appendix A).

Annual Usage Review Summary

A. Use and Trends

SDOT indicated that since our previous review, they have collaborated with external partners to conduct transit studies and pilot programs that use CCTV video streams. In 2022, SDOT worked with a Microsoft research team in a pilot project to create a cloud-based, artificial intelligence model that counts and classifies vehicles for transit safety and efficiency analysis. SDOT also worked with Currux Vision[1] in 2022 to pilot their use of AI. SDOT is currently using two Currux units to count and classify vehicles using the publicly available CCTV streams. The Seattle Information Technology Department determined that the Currux system is not surveillance technology. SDOT believes that AI-driven

[1] Currux Vision builds autonomous AI systems for smart infrastructure including systems for traffic monitoring and enforcement. SDOT uses the Currux system to count and classify vehicles. The system also performs near-miss analysis, red light running, pedestrian travel paths across the roadway, bus lane violations (not used for enforcement), and other analytics on high-priority bridges and busy arterials that often need data collected on a regular basis.

video analytics is the general direction for the traffic industry and was recently awarded a federal grant for an AI-driven safety program along the Martin Luther King Jr. Way South light rail corridor.

In 2022, the use of CCTV by SDOT Transit Operations Center declined by 140 hours due to personnel changes.[2] CCTV traffic cameras continue to be available for public use 24 hours a day, 365 days per year. In 2022, SDOT replaced 9 cameras and added 25 cameras.

B. Data Sharing

SDOT allows the following City entities to log into the CCTV system's server (Cameleon):

- SDOT Transportation Operations Center
- SDOT Maintenance Operations Unit Dispatch
- SDOT Traffic Signal Shop
- SDOT Traffic Signal Timing Engineers
- Seattle Emergency Operations Center
- Seattle Executive Protection Unit
- Seattle Fire Alarm Center
- Seattle Police Operations Center

The two pilot programs and studies, which were described above, used the publicly available CCTV streams on the City's Traveler Information Map.

C. Data Management Protocols

SDOT has the Camera Control Protocol Guidelines that specify how CCTV traffic cameras, and their data can be used. For example, these protocols allow the SDOT Transit Operations Center to record video for internal traffic studies, but the guidelines require employees to delete the video files within 10 days.

SDOT indicated that short recordings (30 seconds or less) produced by the Currux system for visual confirmation are stored for fewer than 10 days, in accordance with existing policies.

D. Impacts on Civil Liberties

SDOT informed us that, in line with existing policies, the Currux system only displays and records videos at a low resolution to ensure that the system is not used to read license plates, identify faces, and see other personally identifiable details.

[2] SDOT reported that use of CCTV by the TOC personnel hours declined by 1.58 percent to 8,738 hours.

E. Complaints, Concerns, and Other Assessments

SDOT documents all inquiries they receive about CCTV cameras. SDOT's standard operating procedure requires that they respond to customer inquiries within 10 business days. We reviewed all CCTV-related inquiries between January and December 2022 and summarized our observations in Exhibit 1.

Exhibit 1: Customer Inquiries About CCTV Traffic Cameras (January to December 2022)

Inquiry Topic	Number of Inquiries
Request for camera footage	53
Cameras or website not working as intended	18
Request to change camera aim or zoom in/out	6
Question related to camera functionality, ownership, and use	11
Unrelated to CCTV or not enough information to categorize	14
Total	**102**

Source: Office of City Auditor analysis of the Seattle Department of Transportation's Customer Service Request System.

We also reviewed the City of Seattle Department of Facilities and Administrative Services Customer Service Bureau 2022 database of comments and complaints and found none related to CCTV traffic cameras. We could not locate any internal audits or assessments of code compliance related to CCTV traffic cameras for the period of our review.

F. Total Annual Costs

SDOT reported the estimated total personnel cost for the CCTV traffic cameras operation in 2022 was $1,437,465.

Exhibit 2: Estimated Costs of Operating the CCTV System in 2022

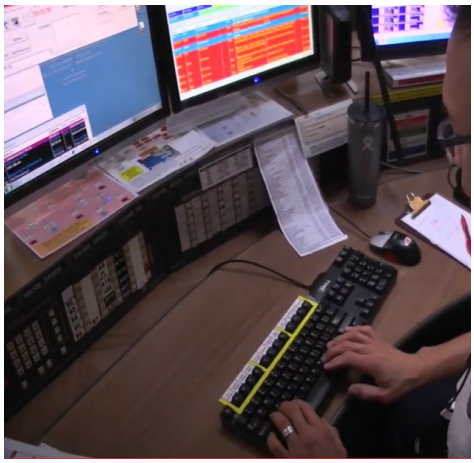
Cost Description	2022 Costs
2022 annual license fee	$13,983
Personnel costs*	$1,437,465
Maintenance costs	$91,560
Total	**$1,543,008**

Source: Seattle Office of City Auditor analysis of Seattle Department of Transportation data.
*SDOT provided these estimated personnel costs based on how often the Transit Operations Center staff use the CCTV system.

SEATTLE FIRE DEPARTMENT COMPUTER-AIDED DISPATCH

Technology Description

Computer-Aided Dispatch (CAD) is a suite of software packages that provide unit (e.g., fire engines) dispatch recommendations for 911 emergency calls based on the reported problem and location of a caller. CAD also maintains the status of responding units while SFD officers use CAD mobile data terminals in the field. Usually, public participation in CAD is opt-in when individuals make a call for service. However, individuals may call and provide personal information about someone else and without that person's knowledge or approval, and dispatchers may enter personally identifying information into CAD about the public without providing notice to those individuals. See our initial CAD audit for more detailed information on the CAD system.



Source: Seattle Fire Department

Annual Usage Review Summary

A. Use and Trends

SFD continues to use CAD to manage dispatches for thousands of responses each year. SFD informed us that CAD and CAD mobile data terminals were used in dispatches for the 91,117 incidents they responded to in 2022.

SFD is working on including the list of CAD approved and inappropriate uses in its policies, as we recommended during our previous review (see Appendix B, Recommendation 1).

B. Data Sharing

SFD CAD and its data are shared and accessible to the following entities:

- All SFD employees: Levels of access depend on the employee's need to access the system.

- Public: Online public access to 911 dispatch information is available through two URLs: sfdlive.com and web.seattle.gov/sfd/realtime911.
- American Medical Response (AMR): SFD provides real-time access to AMR, which is a medical transportation company the City contracts with to provide some ambulance services, to coordinate basic life and emergency medical support calls.
- PulsePoint: A phone application used to coordinate CPR volunteers and the location of automated external defibrillators (AEDs) with emergency cardiac victims
- King County Emergency Medical Services: King County gets a nightly extract of CAD data via electronic health records data.
- University of Washington Medicine, Harborview Medical Center: UW Medicine is on contract with the City to oversee the SFD Medical Quality Program by providing advice, program planning assistance, and program evaluation assistance. As contract employees, UW Medicine has full access to CAD data.
- Seattle Information Technology Department (SITD) Client Services: SITD has data access to CAD so it can provide technology client services.
- Law enforcement: SFD shares CAD information with law enforcement agencies under the Uniform Healthcare Information Act, such as the Seattle Police Department.
- National Fire Incident Reporting System (NFIRS): This federal agency is not listed in the SFD CAD Surveillance Impact Report (SIR), but it is an agency SFD shares CAD data with.
- City Attorney's Office (CAO): Data is regularly requested and shared with CAO.

SFD is working on implementing our recommendations about data sharing from previous review (see Appendix B, Recommendations 2 – 8).

C. Data Management Protocols

SFD has not yet updated their data management protocols as we recommended during our previous review (see Appendix B, Recommendations 9 – 11). SFD needs to document their data management policies and protocols about safeguarding individual (personal) information for CAD, and the SIR needs to be revised to more accurately describe how SFD safeguards individual information. SFD stated that they are working on improving security standards for CAD and updating the SIR.

D. Impacts on Civil Liberties

As we described during our previous review, some personally identifiable information (PII) that SFD dispatchers gather in CAD during emergency calls and response could be used to identify individuals. However, we concluded that the CAD technology had no impact on civil liberties based on the materials we reviewed but recommended that SFD clarify the civil liberty risks with CAD data and mitigating efforts in the SIR and analyze the equity metrics identified in their response to City Council amendment to Ordinance 126295 (see Appendix B, Recommendations 12 and 13).

E. Complaints, Concerns, and Other Assessments

SFD informed us that they did not receive any complaints regarding the use of CAD in 2022. We reviewed the City of Seattle Department of Facilities and Administrative Services Customer Service Bureau 2022 database of comments and complaints and found none related to CAD. We could not locate any internal audits or assessments of code compliance related to CAD for the period of our review.

SFD is working on addressing the concerns raised in the SIR, as we recommended during our previous review (see Appendix B, Recommendations 5, 14, 15).

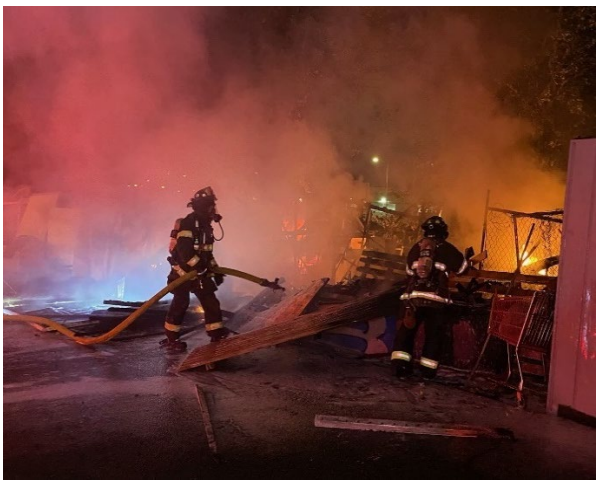
F. Total Annual Costs

The annual licensing cost for CAD technology was $201,675.78, and the total operating budget for 2022 including maintenance was $252,802.27. SFD was unable to estimate personnel costs since CAD is used department-wide and there is no direct allocation for CAD use for any specific employees.

SEATTLE FIRE DEPARTMENT HAZARDOUS MATERIALS AND EMERGENCY SCENE CAMERAS

Technology Description

The Seattle Fire Department (SFD) has two categories of cameras: hazardous materials cameras and emergency scene cameras. SFD's hazardous materials cameras consist of four iPads, one iPhone, and two GoPro cameras. SFD's emergency scene cameras consist of different camera models distributed among three units: Seattle Medic One, the Safety Unit, and the Fire Investigation Unit (FIU). Seattle Medic One employees use their department-issued iPhones. The Safety Unit has three Nikon digital cameras. The FIU has five Nikon digital cameras. See our initial audit for more detailed information on the hazardous materials and emergency scene cameras.



Source: Seattle Fire Department

Annual Usage Review Summary

A. Use and Trends

The Hazardous Materials (HazMat) team continues to use cameras to detect and identify hazardous materials from a safe distance. For example, the HazMat team takes photos of scenes where there are many potentially hazardous items that need to be inspected and researched, such as during a home lab investigation. SFD informed us that the HazMat team responded to 40 incidents in 2022.

Emergency scene cameras continue to be used by the Seattle Medic One team, the Safety Unit, and the Fire Investigation Unit to take photos of incidents and document severity and evidence as allowable in the department use policy. SFD informed us that in 2022, the Safety Unit responded to 774 incidents and the Fire Investigation Unit responded to 606 incidents.

B. Data Sharing

The HazMat team occasionally shares photos of hazardous materials with local law enforcement to investigate criminal activities, and emergency scene photos are occasionally shared with other City departments and medical professionals.

SFD is in the process of developing an acceptable use policy for its hazardous materials and emergency scene cameras, as recommended during our previous review (see Appendix C, Recommendations 2 and 4).

C. Data Management Protocols

SFD continues to practice appropriate data management protocols for their hazardous materials and emergency scene cameras. However, we recommended that SFD develop written policies describing their data management protocols during our previous review, which SFD indicated that they are developing (see Appendix C, Recommendations 2 and 4).

D. Impacts on Civil Liberties

SFD officials explained that they mitigate risks to civil liberties by avoiding taking photos of the public, keeping the cameras in a secure location, and limiting access to the shared drive where photos are stored.

SFD indicated that they have not identified new impacts on civil liberties caused by use of the cameras.

E. Complaints, Concerns, and Other Assessments

SFD informed us that they did not receive any complaints regarding the use of hazardous materials and emergency scene cameras in 2022. We reviewed the City of Seattle Department of Facilities and Administrative Services Customer Service Bureau 2022 database of comments and complaints and found none related to SFD cameras. We could not locate any internal audits or assessments of code compliance related to SFD cameras for the period of our review.

F. Total Annual Costs

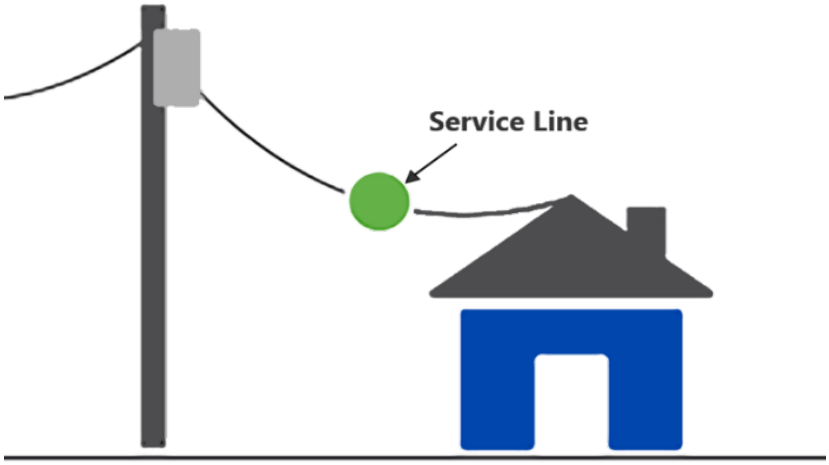
SFD indicated that no annual maintenance cost was incurred for the hazardous materials and emergency scene cameras in 2022. We reported the acquisition costs for most of the cameras in our initial audit and recommended that SFD update their SIR to include the total cost information of their full HazMat camera inventory

(see Appendix C, Recommendation 6). In response to our recommendation, SFD reported that the cost of acquiring the GoPro cameras and accessories over the past four years was $962.73.

SEATTLE CITY LIGHT CURRENT DIVERSION TECHNOLOGIES

Technology Description

Seattle City Light uses three technologies to inspect and measure the difference in current between the service line at the utility pole and the meter during current diversion investigations.



Source: Seattle Office of City Auditor adapted from https://www.seattle.gov/city-light/about-us/what-we-do

The SensorLink Transformer Meter System (TMS), also known as a Check Meter Device, is a device that measures the amount of electrical energy flowing through a service line wire over time. The TMS digitally captures energy flow data for later retrieval by City Light's Current Diversion Team via a secure wireless protocol. City Light uses the TMS information in the calculation of diverted energy.

The SensorLink Ampstik (also known as an Ampfork) is a device used to detect instantaneous current flow in amperage through a service line. It includes an electrical transmitter device mounted on a telescoping pole (up to 40 to 50 feet) that allows the fork-shaped device to be placed around a service line wire near the distribution pole and a handheld receiver that displays instantaneous readings of current flow reported in amps. A meter electrician uses the readings together with meter reads to determine if current is being diverted.

A spotting scope and binoculars are used interchangeably, depending on City Light staff preference, to examine meters in assessing if current diversion is occurring, when distance is a barrier to close physical inspection. These devices may also be used to determine if potentially dangerous alterations to City Light's electrical infrastructure exist. The binoculars and spotting scope themselves do not collect data and

contain no special enhancements requiring power such as night vision or video-recording capabilities. See our initial audit for more detailed information on the current diversion technologies.

Annual Usage Review Summary

A. Use and Trends

According to City Light, the TMS, Ampfork, binoculars, and spotting scope were not used in 2022. Unless these technologies are retired from service, they will remain as an asset in City Light's books and records and will be subject to future evaluation as surveillance technologies.

B. Data Sharing

City Light indicated that these technologies did not generate any data in 2022. Therefore, no data was shared.

In response to our previous recommendations, City Light is developing an operational procedure manual with data-sharing statements that aligns with those in the Current Diversion Technologies Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18 (see Appendix D, Recommendation 3 and 4).

C. Data Management Protocols

As reported in our previous review, the Seattle Information Technology Department (SITD) has not performed any audits of access rights and City Light's policies and procedures did not have such requirements. Audits will ensure the timely removal of individuals from access to the secure drive who have left the City and should no longer have access to it. City Light's data retention policy does not align with the City's data retention requirements, which may result in City Light over- or under-retaining documentation under City policy. Also, there is no documentation in the process's policies and procedures to transfer data captured by the TMS and Ampstik devices to the City Light secure drive.

City Light indicated that they are working on implementing our recommendations to update their policies and procedures (see Appendix D, Recommendation 5, 6, and 7).

D. Impacts on Civil Liberties

As previously reported, City Light did not and will not perform an equity analysis of past enforcement locations as stated in the Surveillance Impact Reports (SIR).

City Light is currently working on updating the SIR to explain why they will not implement a prior recommendation to perform an equity analysis of past enforcement locations (see Appendix D, Recommendation 8).

E. Complaints, Concerns, and Other Assessments

City Light reported that they did not receive any complaints about these technologies in 2022. We reviewed the City of Seattle Department of Facilities and Administrative Services Customer Service Bureau 2022 database of comments and complaints and found none related to these technologies. We could not locate any internal audits or assessments of code compliance related to any of the technologies for the period of our review.

F. Total Annual Costs

City Light indicated that they did not incur any expenses related to their surveillance technologies in 2022.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

Our audit objectives were to review the City's compliance with Seattle Municipal Code (SMC) 14.18.060:

A. How surveillance technology has been used, how frequently, and whether usage patterns are changing over time.

B. How often surveillance technology or its data are being shared with other entities, including other governments in particular.

C. How well data management protocols are safeguarding individual information.

D. How deployment of surveillance technologies impacted or could impact civil liberties or have disproportionate effects on disadvantaged populations, and how those impacts are being mitigated.

E. A summary of any complaints or concerns received by or known by departments about their surveillance technology and the results of any internal audits or other assessments of code compliance.

F. Total annual costs for use of the surveillance technology, including personnel and other ongoing costs.

Scope

The scope for this audit included activities in 2022 and covered the following technologies:

- Seattle Department of Transportation Closed Circuit Television Cameras
- Seattle Fire Department Computer-Aided Dispatch
- Seattle Fire Department Hazardous Materials and Emergency Scene Cameras
- Seattle City Light Current Diversion Technologies

Methodology

To accomplish the audit's objectives, we performed the following:

- Reviewed the technology usage for compliance with Seattle Municipal Code 14.18.060.
- Reviewed the relevant Surveillance Impact Reports.
- Interviewed City officials.
- Reviewed 2022 technology cost data.

- Reviewed data from the City's Department of Facilities and Administrative Services Customer Service Bureau database of comments and complaints received in 2022.
- Reviewed the status of the recommendations from our previous audits.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

APPENDIX A

Recommendations from Previous Review – Seattle Department of Transportation Closed Circuit Television (CCTV) Cameras

Audit Recommendation	Implementation Status
Recommendation 1: The Seattle Department of Transportation should develop and implement a process that captures all new and installed CCTV traffic cameras in the city, particularly those added via capital projects.	**Implemented.** The Seattle Department of Transportation (SDOT) updated the CCTV Standard Operational Policy document with the process that documents adding CCTV to SDOT's Asset Management System.
Recommendation 2: The Seattle Department of Transportation should prominently post a notification when the Traveler Information website is accessed that the system is intended to be used to monitor traffic and for no other purpose.	**Implemented**. Upon clicking a camera icon on the Traveler Information Map, a banner scrolls across the screen stating, "The CCTV system and associated data are intended for traffic monitoring or traffic management and for no other purpose."
Recommendation 3: Operational Policy 2 should be clarified to: 1) state that non-Seattle Department of Transportation (non-SDOT) City departments are authorized to use the CCTV system and data for any reason if it is related to traffic management, 2) define the two exceptions for using the CCTV system and data for non-traffic management purposes, and 3) define what is meant by "to monitor a major city-wide event."	**Implemented**. The Seattle Department of Transportation (SDOT) updated the CCTV Standard Operational Policy document to state that non-SDOT users may use the CCTV system as it relates to traffic management, including any exceptions for non-traffic purposes. A definition has been provided for what qualifies as a major city-wide event.
Recommendation 4: The Seattle Department of Transportation (SDOT) should develop and execute use agreements with non-SDOT departments that use the CCTV system and specify in the agreements that the system shall not be used for civil or criminal enforcement purposes by non-SDOT departments.	**Implemented**. The Seattle Department of Transportation (SDOT) created a Traffic User Agreement outlining the rules of use for operating the CCTV system and stating that the system shall not be used for civil or criminal enforcement purposes by non-SDOT departments. This shall be signed annually by CCTV users.
Recommendation 5: The Seattle Department of Transportation should engage cybersecurity experts to conduct regular security assessments of the CCTV traffic cameras system and to follow-up on the implementation progress of a 2015 network security risk report. The regular security assessments should specifically address data security and the risk of CCTV traffic cameras data being inadvertently or improperly shared. This work could be done by the City of Seattle's Information Technology Department or by an independent cybersecurity consultant.	**Implemented**. The Seattle Department of Transportation (SDOT) has an active engagement with assigned Seattle Information Technology Department (ITD) cybersecurity experts. This includes recurring meetings to review practices and technologies while providing guidance for improving SDOT's overall security posture.
Recommendation 6-1: The Seattle Department of Transportation should clarify in its Camera Control Protocol what is meant by the term "absolutely necessary to allow the operator to perform a vital component of their jobs" with respect to operators zooming in close enough to discern personally identifiable information. Providing examples of what are included and excluded could help to clarify the meaning of this term.	**Implemented**. The Seattle Department of Transportation updated the CCTV Standard Operational Policy document by defining the phrase in the Rules of Use, Section 2.3.a.

Audit Recommendation	Implementation Status
Recommendation 6-2: The Seattle Department of Transportation should clarify in its Camera Control Protocol what is meant by the phrase "compelling traffic operational needs" with respect to the prohibition of recording video images. Providing examples of what are included and excluded could help to clarify the meaning of this phrase.	**Implemented**. The Seattle Department of Transportation updated the CCTV Standard Operational Policy document by defining the phrase mentioned in the Rules of Use, Section 2.4.a, and Section 3.1.
Recommendation 7: The Seattle Department of Transportation (SDOT) should resolve the inconsistencies in operational policies in the SIR and the Camera Control Protocol regarding references to where cameras may be used to view/monitor conditions (i.e., SDOT-owned roadways, public rights-of-way, and/or sidewalks).	**Implemented**. The Seattle Department of Transportation updated the Rules of Use contained in the SIR and the Camera Control Protocol, now called the CCTV SOP, to mirror each other exactly.
Recommendation 8: Operational Policy 3.0, #3 in the City Council-adopted Condensed Surveillance Impact Report (CSIR) states: To the extent feasible, CCTV public feed must be terminated during such times as personally identifiable information is visible on the feed. This operational policy is not included in the City Council-adopted Surveillance Impact Report (SIR). The Seattle Department of Transportation should update the SIR and/or CSIR to make both documents consistent.	**Implemented**. The Seattle Department of Transportation updated the Operational Policy section in the CSIR (Section 3.0 – 3.3) and the SIR (Section 5) to make them consistent.
Recommendation 9: References in the Surveillance Impact Report and the Seattle Department of Transportation's (SDOT) CCTV Camera Use Policy regarding the destruction/deletion of files of recordings are inconsistent. SDOT should revise these policies to be consistent with one another and specify whether the number of days refers to working days or calendar days.	**Implemented**. The Seattle Department of Transportation updated the CCTV Standard Operational Policy, Surveillance Impact Report, and Condensed Surveillance Impact Report documents to make them consistent in referring to the deletion of recordings within 10 business days.
Recommendation 10-1: The Seattle Department of Transportation should include in its CCTV system data sharing/use agreements with other City departments language that they should not record what they view through the cameras.	**Implemented**. The CCTV Traffic Camera User Agreement states in Rule of Use # 4, "Video images shall not be recorded."
Recommendation 10-2: The Seattle Department of Transportation should consult with the City Attorney's Office to determine whether a notification could be added to the Traveler Information website that recording from this public website should be prohibited.	**Implemented**. The Seattle Department of Transportation updated the Traveler Information website to include this language.
Recommendation 11: The Seattle Department of Transportation (SDOT) should develop a structured training program, including a schedule for periodic re-training, for non-SDOT users of Cameleon that is appropriate to their use of the system.	**Implemented**. The Seattle Department of Transportation (SDOT) reported that each year on the date of hire, non-SDOT users of Cameleon shall view a presentation on how to operate the Cameleon application, and sign/re-sign the CCTV Traffic User Agreement indicating an understanding of and commitment to abide by the Rules of Use stated in the document.

Audit Recommendation	Implementation Status
Recommendation 12: The Seattle Department of Transportation's (SDOT) Transportation Operations Center should maintain documentation of when training was completed for all Cameleon users (within and outside of SDOT).	**Implemented**. The Seattle Department of Transportation (SDOT) reported that the CCTV Traffic User Agreement is signed via Adobe Sign, and Agreements are kept in SDOT's Adobe Sign library.
Recommendation 13: The Seattle Department of Transportation should work with the City Records Manager and the City Auditor to identify the appropriate retention and ensure it is listed correctly on the SDOT retention schedules so that Cameleon logs meet both the City's recordkeeping requirements and maintain availability of the logs for the City Auditor's Office to complete annual surveillance usage reviews of the CCTV technology.	**Implemented**. The City Records Manager has recommended a deletion policy for information in the system identified as System Usage – Monitoring to be deleted after 2 years and 6 months to adequately cover the 2-year time frame that would allow an annual usage review of Surveillance technology each September as indicated in Ordinance 125679 Section 5.
Recommendation 14: The Seattle Department of Transportation should rewrite Surveillance Impact Report Operational Policy 9 to clarify which logs the requirements are referring to.	**Implemented**. The Seattle Department of Transportation (SDOT) noted that there is no Operational Policy 9, but SDOT updated Operational Policy 8.2 to state, "Additionally, per the operational policy outlined above, SDOT will retain quarterly Cameleon software usage logs of all access to and operations of the CCTV, including streaming stop/start, recording dates, and topics."
Recommendation 15: Section 8.2.1 in the Closed-Circuit Television Camera (CCTV) Surveillance Impact Report should be revised to accurately reflect the current practice of each camera being checked once daily by Seattle Department of Transportation CCTV camera operators to ensure that it is in its home preset position.	**Implemented**. The Seattle Department of Transportation (SDOT) revised Section 8.2.1 of the CCTV SIR to state that CCTV cameras are checked once daily to ensure that it is in the home preset position.
Recommendation 16: The Seattle Department of Transportation should begin consistently documenting the rationale for its decisions about where to locate new CCTV cameras.	**Implemented**. The Seattle Department of Transportation stated that Section 8 of the CCTV Standard Operational Policy document explains the steps to be taken to document the rationale for CCTV locations.
Recommendation 17: To ensure that the Seattle Department of Transportation can appropriately respond to and report on complaints about misuse of surveillance technologies, it should document all complaints and concerns from all sources, including from social media.	**Implemented**. The Seattle Department of Transportation developed a log to document concerns about the misuse of surveillance technologies from all sources.

APPENDIX B

Recommendations from Previous Review – Seattle Fire Department Computer-Aided Dispatch

Audit Recommendation	Implementation Status
Recommendation 1: The Seattle Fire Department's (SFD) Fire Alarm Center operating procedures should be updated to include the list of Computer-Aided Dispatch system (CAD) approved and inappropriate uses listed in the CAD Surveillance Impact Report and SFD should develop a plan for communicating this information to its employees and the entities it shares CAD data with.	**Pending.** The Seattle Fire Department (SFD) reported that it is working on implementing a more detailed Department-wide policy, rather than a policy only for the Fire Alarm Center, on the disclosure of Computer-Aided Dispatch (CAD) data. The Seattle Attorney's Office advised SFD about sharing confidential medical information (including some CAD data) with various entities. This guidance will provide a decision-making framework for SFD employees working in the realm of public disclosure. This recommendation will be considered implemented when SFD approves the policy, and it has been communicated to SFD employees.
Recommendation 2: As the Seattle Fire Department renews or creates new contracts or agreements with entities with which it shares Computer-Aided Dispatch (CAD) system data, these documents should include protocols that cover CAD data access, sharing, and retention.	**Pending.** The Seattle Fire Department (SFD) reported that it has begun incorporating language regarding the use of Computer-Aided Dispatch (CAD) data in data sharing agreements, including most recently in the Virtual Command Center (VCC) agreement. Future data sharing agreements will include language on SFD CAD if it is to be shared. This recommendation will be considered implemented when data sharing agreements with the University of Washington Harborview Medical Center and American Medical Response include language regarding the use of CAD data in those agreements.
Recommendation 3: The Seattle Fire Department (SFD) should include information about the need for data sharing agreements in SFD's Fire Alarm Center Policies and Operating Guidelines to ensure their placement in future SFD agreements with other entities.	**Pending.** The Seattle Fire Department (SFD) reported that it will include, in a SFD department-wide policy, language requiring data sharing agreements with all entities that it shares data with. This recommendation will be considered implemented when SFD can demonstrate the language is included in the department-wide policy.
Recommendation 4: The Seattle Fire Department (SFD) should modify the Computer-Aided Dispatch (CAD) Surveillance Impact Report to state that SFD shares CAD data with the federal National Fire Incident Reporting System (NFIRS) and should indicate the frequency with which SFD has shared data with NFIRS.	**Pending.** The Seattle Fire Department (SFD) reported that is working with the Seattle Information Technology Department (SITD) to update the Computer-Aided Dispatch Surveillance Impact Report (SIR) to include that it shares data with the federal National Fire Incident Reporting System (NFIRS). Changes to the SIR were delayed due to staffing changes in SITD. This recommendation will be considered implemented when the SFD Computer-Aided Dispatch SIR notes that SFD shares data with NFIRS.

Audit Recommendation	Implementation Status
Recommendation 5: The Seattle Fire Department (SFD) and the Office of the City Clerk's City Records Management Program should prioritize creating and implementing Computer-Aided Dispatch (CAD) data records retention schedules in compliance with the Revised Code of Washington (RCW) and the Seattle Municipal Code by fourth quarter 2022. SFD and Records Management Program staff should request any needed additional resources to ensure the schedules are completed by the end of 2022 and are incorporated into SFD Fire Alarm Center Policies and Operating Guidelines and any agreements with entities SFD shares CAD data with.	**Pending.** The Seattle Fire Department (SFD) reported that it worked with City Records Management Program staff to update SFD's Computer-Aided Dispatch records retention schedules to reflect state guidelines. However, due to recent litigation and open public records requests, SFD cannot change its retention dates until the litigation and records requests are resolved. We will consider this recommendation implemented when SFD can demonstrate that it has implemented the state required records retention schedules.
Recommendation 6: The Seattle Fire Department (SFD) should develop and execute agreements with City departments that use SFD Computer-Aided Dispatch data that specify what are the approved uses of the data.	**Pending.** The Seattle Fire Department (SFD) reported that it has begun incorporating language regarding the use of Computer-Aided Dispatch (CAD) data in data sharing agreements, including most recently in the Virtual Command Center (VCC) agreement which includes the Seattle Police Department and the Seattle Department of Transportation as members. Future data sharing agreements with City departments will include language on the appropriate use of SFD CAD data. This recommendation will be considered implemented when the following entities' data sharing agreements also include language regarding the use of CAD data: the Seattle Community Safety and Communications Call Center, and the Seattle Office of Emergency Management.
Recommendation 7: The Seattle Fire Department (SFD) should document the processes it uses to restrict the dissemination of sensitive surveillance technology data, and to redact sensitive information to ensure consistency with applicable State and City laws. Further, the documentation should indicate that agreements with other entities should include SFD's procedures for redacting sensitive information.	**Implemented.** The Seattle Fire Department (SFD) reported that it uses the guidance the Citywide Public Records Act Program provides on the information and records that are exempt from disclosure and relies on the City's Multi-Department Administrative Rules to process and handle records requests and this guide and process addresses how SFD should restrict the dissemination of sensitive surveillance technology data and how to redact sensitive information. SFD has also implemented a Public Records Protocol and Process guide. We consider this recommendation as implemented.
Recommendation 8: The Seattle Fire Department (SFD) should limit access to Computer-Aided Dispatch system premise notes and dispatcher comments to SFD employees who need access to them to perform their jobs.	**Pending.** The Seattle Fire Department (SFD) reported that in 2023 it will review access controls for employees and make recommendations about employee access to Computer-Aided Dispatch system premise notes and dispatcher comments. This recommendation will be considered implemented when SFD can report on the results of its access control review and implement recommendations stemming from that review.

Audit Recommendation	Implementation Status
Recommendation 9: The Seattle Information Technology Department and the Seattle Fire Department (SFD) should work to address data management policy and protocol about safeguarding individual (personal) information contained in the Computer-Aided Dispatch system.	**Pending.** The Seattle Fire Department (SFD) reported that there is a citywide effort to improve security standards for all City technologies, especially at SFD, to help ensure that personal information is protected. Specifically, SFD has created a policy regarding ensuring accurate information on individuals is found in Computer-Aided Dispatch (CAD) premise notes. This recommendation will be considered implemented when security standards for SFD CAD are completed and documented.
Recommendation 10: The Seattle Fire Department (SFD) Computer-Aided Dispatch (CAD) Surveillance Impact Report should be updated to state that the SFD Public Disclosure Officer safeguards individual (personal) information generated by CAD when the public makes CAD records requests.	**Pending.** The Seattle Fire Department (SFD) reported that it is working with the Seattle Information Technology Department to update the Surveillance Impact Report (SIR). This recommendation will be considered implemented when the SIR states that the SFD Public Disclosure Officer safeguards individual (personal) information generated by SFD Computer-Aided Dispatch (CAD) when the public makes SFD CAD records requests.
Recommendation 11: The Seattle Fire Department (SFD) should update its Computer-Aided Dispatch Surveillance Impact Report to include the process SFD uses to safeguard individual (personal) information, including information about access controls and other measures it takes to safeguard individual information.	**Pending.** The Seattle Fire Department (SFD) reported that it is working with the Seattle Information Technology Department to update the Surveillance Impact Report (SIR). This recommendation will be considered implemented when the SIR states the process SFD uses to safeguard individual (personal) information, including information about access controls and other measures it takes to safeguard individual information.
Recommendation 12: The Seattle Fire Department (SFD) should update the Computer-Aided Dispatch (CAD) Surveillance Impact Report to clarify the civil liberty risks associated with CAD data and provide information about the steps SFD is currently taking to mitigate the potential disparate impacts of SFD CAD on the civil rights and liberties on communities of color and other marginalized communities.	**Pending.** The Seattle Fire Department (SFD) reported that it is working with the Seattle Information Technology Department to update the Surveillance Impact Report (SIR). This recommendation will be considered implemented when the SIR is updated to clarify the civil liberty risks associated with Computer-Aided Dispatch (CAD) data and the SIR provides information about the steps SFD is currently taking to mitigate the potential disparate impacts of SFD CAD on the civil rights and liberties on communities of color and other marginalized communities.
Recommendation 13: The Seattle Fire Department (SFD) should analyze the equity metrics identified in their response to the City Council amendment that was part of Ordinance 126295 (Council Bill 120003) and report the results of the analysis to the City Council by December 31, 2022. Should SFD assign this work to the SFD Race and Social Justice Initiative Change Team, it should provide the Change Team with the resources it needs to conduct this analysis.	**Pending.** The Seattle Fire Department (SFD) reported that it began working on a racial equity toolkit to address this issue. However, due to recent litigation regarding premise notes and their potential impact on vulnerable populations, SFD has delayed this effort. This recommendation will be considered implemented when SFD reports the results of the equity metrics analysis to the Seattle City Council.

Audit Recommendation	Implementation Status
Recommendation 14: The Seattle Fire Department (SFD) and the Seattle Information Technology Department should provide responses to all unaddressed SFD Computer-Aided Dispatch (CAD) concerns raised during the public engagement process and include their responses in an updated SFD CAD Surveillance Impact Report.	**Pending.** The Seattle Fire Department (SFD) is working with the Seattle Information Technology Department to address all concerns raised during the public engagement process and include its responses in an updated SFD Computer-Aided Dispatch Surveillance Impact Report. This recommendation will be considered implemented when SFD has responded to all unaddressed SFD Computer-Aided Dispatch (CAD) concerns raised during the public engagement process and include their responses in an updated SFD CAD Surveillance Impact Report.
Recommendation 15: The Seattle Fire Department should work with the City Attorney's Office to determine the feasibility of the City of Seattle Office of Intergovernmental Relations lobbying the State legislature to change the Public Records Act (PRA) to guide how to identify PRA requests that involve persons with restraining orders to exempt the records request because of the restraining order.	**Pending.** The Seattle Fire Department (SFD) reported that the City Attorney's Office advised them that they are not the appropriate entity to assess the feasibility of having the City of Seattle Office of Intergovernmental Relations lobby the State Legislature to change the Public Records Act (PRA) to guide how to identify PRA requests that involve persons with restraining orders to exempt the records request because of the restraining order. As such, SFD will work directly with the Seattle Office of Intergovernmental Relations to determine the feasibility of pursuing this issue. This recommendation will be considered implemented when SFD can report on whether the City intends to pursue this issue with the State Legislature.
Recommendation 16: The Seattle Fire Department should update its Computer-Aided Dispatch (CAD) Surveillance Impact Report (SIR) to reflect the 2021 annual maintenance and licensing costs of $201,675.78 (or the current costs if different from this amount) and should provide an estimate of the total costs associated with SFD CAD as requested in Seattle Municipal Code 14.18.040.B6.	**Pending.** The Seattle Fire Department reported that it is working with the Seattle Information Technology Department to update the Surveillance Impact Report (SIR) to reflect the 2021 annual maintenance and licensing costs. This recommendation will be considered implemented when the updated costs are included in the SIR.
Recommendation 17: The Seattle Fire Department (SFD) and the Seattle Information Technology Department, in consultation with the City Attorney's Office, should decide if any Computer-Aided Dispatch (CAD) data should be exempted from Seattle Municipal Code 14.18 requirements. If they determine that certain CAD data should be exempted, SFD should update the CAD Surveillance Impact Report accordingly.	**Pending.** The Seattle Fire Department reported that the decision of whether to exempt any Computer-Aided Dispatch data from the requirements of Seattle Municipal Code 14.18 requirements is being led by the Digital Privacy, Accountability and Compliance Division of the Seattle Information Technology Department (SITD) and no decision was made in 2022. Future updates for this recommendation will be directed to the SITD. This recommendation will be considered implemented when SITD documents and communicates to the Seattle City Council its decision about whether to exempt any Computer-Aided Dispatch data from requirements of Seattle Municipal Code 14.18.

Audit Recommendation	Implementation Status
Recommendation 18: The Seattle Fire Department should update the Computer-Aided Dispatch Surveillance Impact Report (SIR) with the corrected hyperlinks that it provided the City Auditor related to Seattle Municipal Code 14.18.040B2 and in other areas of the SIR where there are minor or inconsequential errors.	**Pending.** The Seattle Fire Department reported that it is working with the Seattle Information Technology Department to update the Surveillance Impact Report (SIR) with the corrected hyperlinks related to Seattle Municipal Code 14.18.040B2 and to correct other areas of the SIR where there are minor or inconsequential errors. We will consider this recommendation implemented when the updated SIR has the corrected hyperlinks and other corrections.
Recommendation 19: The Seattle Fire Department should replace the reference to RCW 35A.92.010 in the Computer-Aided Dispatch Surveillance Impact Report with the correct legal citation, RCW 35.103.	**Pending.** The Seattle Fire Department reported that it is working with the Seattle Information Technology Department to update the Computer-Aided Dispatch (CAD) Surveillance Impact Report (SIR) with the corrected reference to RCW 35.103. This recommendation will be considered implemented when the correct RCW reference is noted in the CAD SIR.

APPENDIX C

Recommendations from Previous Review – Seattle Fire Department Hazardous Materials and Emergency Scene Cameras

Audit Recommendation	Implementation Status
Recommendation 1: The Seattle Fire Department should revise the Hazardous Materials Cameras Surveillance Impact Report to include the GoPro cameras, iPhone, and any other camera technologies used by the Hazardous Materials team.	**Pending.** The Seattle Fire Department reported that they are working with the Seattle Information Technology Department to include current camera technology information in the Hazardous Materials Cameras Surveillance Impact Report (SIR). We will consider this recommendation Implemented when the SIR has been updated.
Recommendation 2: The Seattle Fire Department should create an acceptable use policy for their hazardous materials cameras. The policy should include the items in Seattle Municipal Code 14.18.040 B3. The Seattle Fire Department should also create a process for tracking annual camera use.	**Pending.** The Seattle Fire Department (SFD) drafted an updated photo policy and will incorporate the changes into their Policy and Operation Guidelines (POG) document in 2023. We will consider this recommendation implemented when the POG contains the updated policy and when SFD creates a process for tracking camera use.
Recommendation 3: The Seattle Fire Department should revise the Emergency Scene Cameras Surveillance Impact Report to include iPhones and any other camera technologies used by the Seattle Medic One team.	**Pending.** The Seattle Fire Department reported that they are working with the Seattle Information Technology Department to include current camera technology information in the Emergency Scene Cameras Surveillance Impact Report (SIR). We will consider this recommendation Implemented when the SIR has been updated.
Recommendation 4: The Seattle Fire Department should create an acceptable use policy for their emergency scene cameras. The policy should include the items in Seattle Municipal Code 14.18.040 B3. The Seattle Fire Department should also create a process for tracking annual camera use.	**Pending.** The Seattle Fire Department (SFD) drafted an updated photo policy and will incorporate the changes into their Policy and Operation Guidelines (POG) document in 2023. We will consider this recommendation implemented when the POG contains the updated policy and when SFD creates a process for tracking camera use.
Recommendation 5: The Seattle Fire Department should revise the Emergency Scene Cameras Surveillance Impact Report to include the total cost information of their full emergency scene camera inventory, including iPhones, and any related camera equipment.	**Pending.** The Seattle Fire Department reported that they are working with the Seattle Information Technology Department to include cost information in the Emergency Scene Cameras Surveillance Impact Report (SIR). We will consider this recommendation Implemented when the SIR has been updated.
Recommendation 6: The Seattle Fire Department should revise the Hazardous Materials Cameras Surveillance Impact Report to include the total cost information of their full HazMat camera inventory, including their GoPro cameras and iPhone, and any related camera equipment.	**Pending.** The Seattle Fire Department reported that they are working with the Seattle Information Technology Department to include cost information in the Hazardous Materials Cameras Surveillance Impact Report (SIR). We will consider this recommendation Implemented when the SIR has been updated.

APPENDIX D

Recommendations from Previous Review – Seattle City Light Current Diversion Technologies

Audit Recommendation	Implementation Status
Recommendation 1: City Light should formally retire from service the SensorLink Transformer Meter System surveillance technology.	**Pending.** City Light's Technical Metering Operations will evaluate whether the SensorLink Transformer Meter System (TMS) should be retired from service. City Light hopes to make an informed decision by the end of Quarter 2 of 2023. We will consider this recommendation to be implemented when City Light decides whether to retire the SensorLink TMS.
Recommendation 2: City Light should update its policies and procedures to align them with statements made in the Surveillance Impact Reports and with Seattle Municipal Code 14.18 as follows: • A description of each surveillance technology. • The data each technology is reasonably likely to generate. For binoculars and the spotting scope, this would be the observations CDT members are expected to note. • The functionality of each technology. • A description of the purpose and the proposed use of each technology that is aligned with the descriptions in the SIRs. • The requirement to document which technologies are used in each current diversion investigation and how each was used. • The requirement to retire surveillance technologies from service when it becomes known that the technology will no longer be used. • The requirement to train the Current Diversion Team regarding the requirements of SMC 14.18 and the restrictions on each technology as to what data and observations can and cannot be recorded. • Statements in the policies and procedures that address how any improperly collected data will be disposed of.	**Pending.** City Light's Technical Metering Operation is developing an operational procedure manual that is aligned with statements made in the City Light Current Diversion Technologies Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023. We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.

Audit Recommendation	Implementation Status
Recommendation 3: City Light should document the existing protocols for its surveillance technologies and ensure they include how surveillance technologies and data are shared outside of City Light's Technical Metering Operation, including with non-City entities.	**Pending.** City Light's Technical Metering Operation is developing an operational procedure manual aligned with statements made in the Current Diversion Technologies Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023. We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.
Recommendation 4: City Light should include in documented protocols how they ensure compliance from anyone outside of the Technical Metering Operation who City Light shares either surveillance technology or its data with. If current diversion technologies are not shared, that should be specified in the protocols.	**Pending.** City Light's Technical Metering Operation is developing an operational procedure manual aligned with statements made in the Current Diversion Technologies Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023. We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.
Recommendation 5: City Light should update its policies and procedures to require periodic audits of access rights to the secure drive containing current diversion documentation and perform such audits as required by the policy.	**Pending.** City Light's Technical Metering Operation is developing an operational procedure manual aligned with statements made in the Current Diversion Technologies Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023. We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.

Audit Recommendation	Implementation Status
Recommendation 6: City Light should update its policies and procedures to align their records retention requirements with the City's retention requirements for current diversion investigation records.	**Pending.** City Light's Technical Metering Operation is developing an operational procedure manual aligned with statements made in the Current Diversion Technologies Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023 We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.
Recommendation 7: City Light should document in its policies and procedures the process for transferring data captured and recorded from the surveillance technology devices to the secure drive including the requirement to document the timing of transfers.	**Pending.** City Light's Technical Metering Operation is developing a Current Diversion Technologies operational procedure manual to align with statements made in the Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023. We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.
Recommendation 8: City Light should update the Surveillance Impact Reports for its current diversion technologies to explain why it will not perform an equity analysis of past enforcement locations.	**Pending.** After City Light completes development of a current diversion technologies operational procedure manual aligned with statements made in the Surveillance Impact Reports (SIRs) and with the requirements of Seattle Municipal Code 14.18. City Light will contact the Seattle Information Technology Department to determine if changes to the SIRs are required. City Light hopes to have this completed by end of Quarter-4 2023. We will consider this recommendation implemented when the Current Diversion Technologies SIRs are updated.
Recommendation 9: On the next update of the Surveillance Impact Reports for its current diversion technologies, City Light should report the acquisition cost of the binoculars and the spotting scope.	**Closed.** Since City Light's Technical Metering Operations does not have the acquisition cost of the binoculars in their records, they will only update the Current Diversion Technologies Surveillance Impact Reports (SIRs) in the event of any future acquisition costs for binoculars/ spotting scopes. Since no further action will be taken on this recommendation by City Light, we will agree to close it.

Audit Recommendation	Implementation Status
Recommendation 10: City Light should require staff to record on the sign-out sheet the inventory and/or serial numbers of surveillance technology equipment they remove for use from the locking cabinet.	**Implemented.** City Light reported that their Technical Metering Operations unit added an equipment identifier column to the current sign out sheet. We consider this recommendation as implemented.
Recommendation 11: City Light should complete their policies and procedures updates for its current diversion surveillance technologies to align them with Seattle Municipal Code (SMC) 14.18. The requirements of SMC 14.18 should be addressed in the updates and should align with statements made in the current diversion technology Surveillance Impact Reports. City Light management should approve the updated policies and procedures.	**Pending.** City Light's Technical Metering Operation is developing a Current Diversion Technologies operational procedure manual to align with statements made in the Surveillance Impact Reports and with the requirements of Seattle Municipal Code 14.18. The procedure manual and any changes thereafter will be approved by the Chief Operating Officer of Seattle City Light. City Light's department policies and procedures will be updated to reflect this change. City Light hopes to finalize the operational procedure manual by end of Quarter 2 2023. We will consider this recommendation implemented when the Current Diversion Technologies operational procedure manual is completed and approved by the City Light Chief Operating Officer.

APPENDIX E

Seattle Office of City Auditor Mission, Background, and Quality Assurance

Our Mission:
To help the City of Seattle achieve honest, efficient management and full accountability throughout City government. We serve the public interest by providing the City Council, Mayor and City department heads with accurate information, unbiased analysis, and objective recommendations on how best to use public resources in support of the well-being of Seattle residents.

Background:
Seattle voters established our office by a 1991 amendment to the City Charter. The office is an independent department within the legislative branch of City government. The City Auditor reports to the City Council and has a four-year term to ensure their independence in deciding what work the office should perform and reporting the results of this work. The Office of City Auditor conducts performance audits and non-audit projects covering City of Seattle programs, departments, grants, and contracts. The City Auditor's goal is to ensure that the City of Seattle is run as effectively, efficiently, and equitably as possible in compliance with applicable laws and regulations.

How We Ensure Quality:
The office's work is performed in accordance with the Government Auditing Standards issued by the Comptroller General of the United States. These standards provide guidelines for audit planning, fieldwork, quality control systems, staff training, and reporting of results. In addition, the standards require that external auditors periodically review our office's policies, procedures, and activities to ensure that we adhere to these professional standards.

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