MEMORANDUM

To: Kate Garman, Mayor's Office
From: Ginger Armbruster, Dylan Morris, and Sarah Carrier
Re: Surveillance Ordinance Timeline Requirements
Date: 9/17/2018

Purpose
Respond to timeline inquiry from the Mayor's Office. SIR completion requires 180 days (approximately 6 months).

Time requirement for drafting SIRs: 45 Days
- Each SIR represents an individual research project. Data on surveillance technologies is not centralized and in some cases the acquisition occurred prior to retention deadlines and may not be readily available. SIR leads (staff who are completing the work to pull together information on each SIR) must pull resources from field staff, finance, leadership, RSJI and policy teams to complete each individual SIR.
- A blank SIR template, without answers to questions is 35 pages long. On average, each "draft" SIR (a report that has completed the privacy impact assessment, financial information, expertise and references, and partially completed RSJI toolkit), is 50 pages.
    - o Privacy Impact Assessment: 36 long answer questions
    - o Financial Information: 4 long and short answer questions
    - o Expertise and References: 3 short questions
    - o Racial Equity Toolkit: 22 long and short answer questions

Review requirement: 30 Days
- The Privacy Office reviews each SIR multiple times to ensure document completeness and consistency.
- SIRs contain significant policy and financial information. Prior to public release, Department leadership, City Budget and Mayoral Policy staff must review a SIR to ensure alignment with the City's budget and policy directions.

Public Engagement: 30 Days
- The Surveillance Ordinance requires a minimum of one public meeting to discuss a SIR. Robust public engagement does not occur with a single meeting and so, for example, we are conducting three meetings for SPD technologies to provide geographical diversity options. In addition, meetings require several months advance planning to ensure availability, resources and adequate public notice. As it is, the process has had to forgo many Department of Neighborhoods recommendations for engagement due to schedule, funding, and capacity.

Post-Engagement Revision and Review: 75 Days
- The Surveillance Ordinance requires that all public comments be submitted with the SIR, meaning that every email, phone call, letter, as well as notes received during public engagement must be compiled and formatted for inclusion in the individual SIR.
- Public engagement may change how the City wishes to approach a surveillance technology. Review timeline requirements are to ensure continued alignment with City goals.
- Six weeks of the SIR completion timeline is dedicated to the Working Group review.

Attachments
1. Surveillance Impact Report Playbook, a resource for SIR leads to guide them through the process
2. Surveillance Timeline and Deadlines