

Title: Automatic Vehicle Location System Use Policy

Affected Agencies: All Executive Branch Departments and Agencies

Authorities: Collective Bargaining Agreements, King County Master Labor Agreement, RCW 40.14; RCW 42.56 (the Public Records Act); FES-12-1-3-EP: Use of Vehicles for County Business

Keywords: AVL, Automatic Vehicle Location System, Vehicles

Sponsoring Agency: Department of Transportation, Fleet Administration Division

Executive signature:

Date signed:



King County

Doug Constance
10.3.18

I. Purpose

This policy establishes enterprise-wide standards for the business uses of the non-revenue vehicle Automatic Vehicle Location (AVL) System and provides users with guidelines regarding their authority and responsibilities for the data collected and records generated by the system.

II. Applicability and Audience

This policy applies to the Administrative Offices and Executive Departments supervised by the King County Executive. The audience may include any non-Executive Branch King County departments adopting this policy.

III. Definitions

Automatic Vehicle Location (AVL) System – A system that collects the geographic location of a vehicle (which, for purposes of the policy, is defined to include any King County owned non-revenue asset) and transmits data about the vehicle to a user interface in near real time.

AVL System Administrator – A role assigned to select individuals who have the ability and authority for maximum customer-side configuration and use of the software associated with the AVL System.

AVL System General User – A role assigned to system users who are not administrators. Individuals assigned to this position have fewer permissions and authorizations than AVL System Administrators.

AVL Vehicle – Any asset with an AVL device installed including but not limited to cars, trucks, vans, motorcycles, on-road equipment, off-road equipment, and trailers.

Disciplinary Action – Any action steps that address an employee's behaviors or decisions in a manner that may result in punitive consequences for that employee.

Fleet Motor Pool Vehicle – Those County vehicles that are managed and dispatched centrally by the hour through the Fleet Administration Division of the Department of Transportation.

File Plan – The file structure built by an agency under the categories (i.e., record series) provided by Records Management. "Record Series" is a group of records, performing a specific function, which is used as a unit, filed as a unit, and which may be transferred or destroyed as a unit. A record series may consist of a single type of form or a number of different types of documents that are filed together to document a specific function.

Non-Revenue Vehicle – A King County-owned vehicle that does not generate revenue as a result of its use.

Records Retention Schedules – Legal documents that outline the management, preservation, and disposition of public records.

Vehicle Operator – Anyone who operates a King County-owned non-revenue motor vehicle.

IV. Policy

A. One Automatic Vehicle Location System and One Set of Use Standards

1. From the date of this policy forward, there shall be a single AVL system used for non-revenue vehicles in King County, and all non-revenue vehicles must have AVL installed.
 - a. Deviating from the enterprise system for AVL functions will require a business justification that must be approved by the Executive's Office, King County Information Technology (KCIT), and the Department of Executive Services. The process steps are available from Fleet Administration Division.
 - b. Any alternate AVL system shall comply with the directives established in this policy. Departments must demonstrate compliance in their business justification.
2. Departments and offices shall adhere to the use standards established in this policy unless they undergo a process to meet their business needs differently.
 - a. If a department or office decides to establish its own standards for using the enterprise AVL System, it must first establish its intended use and likely impacts to employees, then work with the Office of Labor Relations to ensure that employee interests are sufficiently represented and addressed.
 - b. A department or office that establishes its own standards for using the AVL System must also work with appropriate parties to develop policies that address data and records retention, including guidance for responding to public records requests.

B. Operational Purposes of the AVL System

1. The AVL System is the County's chosen solution for a variety of operational purposes, including:
 - Collecting vehicle odometer readings and usage information
 - Viewing engine diagnostic data
 - Measuring vehicle idling
 - Planning routes and dispatching resources
 - Capturing trip times to inform resource planning and staffing models
 - Recording and reporting work accomplishments (e.g., streets swept, lawns mowed, etc.)

- Integrating GPS vehicle odometer data and work accomplishments into the County's asset management systems
 - Locating a vehicle that may be involved in or in close proximity to an incident
 - Locating lost or stolen vehicles equipped with this technology
 - Enabling departments to offer proof of vehicle presence or absence
 - Supporting the County's response to claims associated with AVL vehicles and damage to AVL vehicles by third parties
2. The AVL System shall not be used as a tool for random monitoring of employee vehicle operators or others who might be tracked by a variety of equipment types available through the AVL System.
 3. Data collected by the AVL System may only be used for the purpose of disciplinary action when there is a good faith reason to do so, based on reasonable suspicion that an employee has committed an offense that could result in discipline.
 4. System users and administrators are prohibited from capturing information identifying people who are clients of King County's services within the AVL System.

C. Responsibilities of Departments and Offices

1. Departments and offices shall appoint an AVL System Administrator who will be a subject matter expert on the system's functions and features, and who will assign users within their department or office.
2. Departments and offices shall be responsible for the data and records generated by the AVL System.
 - a. Departments and offices should work with the Records Management Program to identify records categories and retention periods for the records generated by the system, then incorporate those categories and retention periods into attendant file plan(s) and retention schedule(s).
 - b. Departments and offices shall be responsible for gathering, reviewing, and producing AVL system-generated data and records in response to public records requests.
 - c. Departments and offices shall be responsible for ensuring that any data that they output from the AVL System (into reports or other records) complies with the data management laws and policies that are applicable to their line of business (e.g. HIPAA for certain Public Health and DCHS functions).

3. Departments and offices shall ensure that staff are notified prior to and at the point of use that a vehicle is equipped with an AVL device.
 - a. This notice should include some information about the data that is collected and its intended use.
 - b. This directive also applies to Fleet Motor Pool vehicles, and Fleet Administration Division will ensure that notifications are made to all Motor Pool vehicle users.

D. Other Responsibilities

1. Business representatives, administrators, vehicle operators, and all general users of the AVL System or data generated by the system shall comply with applicable federal, state, and local law.
2. Vehicle operators shall not tamper with or disable AVL devices/hardware.

V. Implementation Plan

- A. Once this policy is signed, it will be communicated via the Executive Policy Manual ZZ list as well as through the Operations Cabinet, the Human Resources community, and the Labor Relations community.
- B. Procedures will be developed for handling requests to use the data in association with employee incidents that may lead to disciplinary actions. Procedures will also be developed for those departments or offices that are interested in pursuing a non-standard use of the system, covering how the proposal is made, reviewed, approved, and implemented.
- C. Each department or office will ensure that anyone who needs to be aware of this policy receives a copy of it or a link to it.

VI. Maintenance

- A. This policy will be maintained by the Fleet Administration Division of the Department of Transportation.
- B. This policy will automatically expire five (5) years after its effective date. A new, revised, or renewed policy will be initiated by the Fleet Administration Division or its successor agency prior to the expiration date.
- C. Any action to rescind, revise, or replace this policy will be initiated by the Fleet Administration Division and will include stakeholder engagement, to include engagement with the Office of Labor Relations.

VII. Consequences for Noncompliance

- A. Failure to adhere to the policy element prohibiting employee tampering with AVL devices/hardware may result in disciplinary action.

- B. Departments and offices that fail to comply with this policy may be exposing themselves to risk of legal action and/or other avoidable or unnecessary costs.
- C. The Office of Performance, Strategy and Budget, in consultation with KCIT, will deny budget requests for systems that have the same requirements and core functionality as the enterprise AVL System.
- D. Fleet Administration Division will not install unapproved AVL systems on County vehicles.

Appendices:

AVL Records Management and Public Records Guidance