

**Document Code No.:** FES 12-7-1

**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-12-1-4-EP: Use of Vehicles for County Business

**Keywords:** AVL, Automatic Vehicle Location System, Vehicles

**Type of Action:** Supersedes FES 12-7 (EP), October 3, 2018



**King County**

**Executive signature:** \_\_\_\_\_

*Don Constantine*

**Date signed and effective:** \_\_\_\_\_

September 14, 2023

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**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.

**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.

**II. 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 Dispatch Vehicle** - Those County vehicles that are managed and dispatched centrally by the hour through the Fleet Services Division of the Department of Executive Services.

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.

### **III. 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 Services 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
  - Viewing vehicle speed 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, roads plowed, 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
  - Identifying suitable vehicles to be replaced with electric vehicles
  - Supporting business decisions on vehicle and equipment needs
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 point of contact who will be familiar with the system's functions and features, and who

will be a resource within their department or office liaising with the Fleet Administrator as needed to obtain data.

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 OCHS 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 Dispatch vehicles, and Fleet Services Division will ensure that notifications are made to all Motor Pool Dispatch 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.

#### **IV. Implementation Plan**

- A.** This policy becomes effective for Executive Branch agencies on the date that it is signed by the Executive. The Fleet Services Division is responsible for implementation of this policy.
- B.** Procedures for handling requests to use the data in association with employee incidents that may lead to disciplinary actions are maintained by the Fleet Services Division. Procedures have been 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 is responsible for communicating this policy to the management structure within their respective agencies and other appropriate parties.

## **V. Maintenance**

- A. This policy will be maintained by the Fleet Services Division, or its successor agency.
- 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 Services 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 Services Division and will include stakeholder engagement, to include engagement with the Office of Labor Relations.

## **VI. 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 Services Division will not install unapproved AVL systems on County vehicles.

### **Appendices:**

AVL Records Management and Public Records Guidance