

Budget Submission Fiscal Years 2016/17 - 2018/19

Presented to:

The Select Standing Committee on Finance
and Government Services
Legislative Assembly of British Columbia

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Overview

This is the budget submission of the Office of the Registrar of Lobbyists (“ORL”) and the Office of the Information and Privacy Commissioner (“OIPC”) for fiscal years 2016/17 through to 2018/19 inclusive. This budget submission supports the attached ORL and OIPC Service Plans for the same three-year period. Approximately 90% of our budget is spent on OIPC related issues, and 10% on ORL activities.

In this budget submission, the Registrar of Lobbyists and the Information and Privacy Commissioner requests, for fiscal year 2016/17, a combined operating budget of \$5,964,000 and, for planning purposes, combined operating budgets for fiscal years 2016/17 and 2017/18 of \$6,023,000 and \$6,082,000 respectively. No change in the annual capital budget of \$45,000 is requested over the three year forecast period.

I would like to, once again, support the idea of attending this Committee at least on a semi-annual basis. I find this accountability opportunity helpful in fulfilling the mandate given to me by the Legislative Assembly.

Mandate of the Office of the Registrar of Lobbyists

The ORL is charged with enforcing the *Lobbyists Registration Act* (“LRA”) and overseeing the B.C. Registry of Lobbyists. The Legislative Assembly passed the LRA in 2001. In 2010, it amended the LRA to enhance lobbying transparency and government accountability. The amendments made registration of lobbyists mandatory; expanded the powers of the Registrar to enforce the LRA; and ushered in a new regime for regulation of lobbying in B.C. Simultaneously, my office launched an online Registry of Lobbyists, which was intended to allow B.C. citizens to see who is lobbying which public officials regarding what issues.

The LRA defines “lobbying” narrowly as communicating, for pay, with a public office holder in an attempt to influence a number of possible outcomes. The LRA does not capture communication between private citizens and government officials regarding matters of personal concern. It requires individuals, whose communications with public office holders meet the legal definition of lobbying, to register as lobbyists and provide information to the Registrar about those activities.

The Registrar is responsible for making this information publicly available through the online, searchable Registry managed by the ORL. Public access to information about lobbyists and their activities is critically important to ensure transparency in government decision-making. The Registrar enforces compliance through an interrelated mix of strategies including education, verification of information in registrations, compliance investigations and the levying of administrative penalties of up to \$25,000.

ORL Major Accomplishments to date for 2015/16

In this section, I would like to highlight the major accomplishments of the ORL since my last appearance before the Committee on May 13, 2015, and previously to that, on November 25, 2014.

In my May 2015 presentation, I highlighted our two major priorities from the ORL Service Plan – increased enforcement of the *Lobbyists Registration Act*, and public education and outreach. I would like to update you on both of these elements.

1. Increased enforcement

Staff have carried out 95 compliance reviews so far this year. Of these 95, 17 went to formal investigations. One has been resolved informally and three resulted in the application of an administrative penalty. Staff resolved 78 through informal means such as education and warnings, and eight reviews carried forward to this year. Informal resolutions are significantly more cost-effective, and during the first three years of my mandate as the Registrar, we have aimed to use informal means to resolve possible non-compliance whenever they are appropriate and effective.

2. Public education and outreach

The ORL has provided orientation, awareness and training for lobbyists and public office holders since 2010. The broad goals of our public education activities are: 1) to increase awareness of the *Lobbyists Registration Act* (LRA) and its provisions; and 2) to support greater compliance with the LRA.

Last fiscal year, after recognizing a need for a more systematic approach, the ORL created a formal public education plan to focus on these goals, with outreach to key audience groups. These groups include organizations that lobby but may not be registered, lobbyists, public office holders, and lawyers. In our new public education plan, we outline specific objectives for each of these target

populations. We are seeing some persistent knowledge gaps among these groups.

In addition to new initiatives, such as increased media relations activities, targeted communications to stakeholders, and a Lobbyists' Conference, we also plan to build upon the practical guidance documents, publications and advisories on the ORL website (www.lobbyistsregistrar.bc.ca). These resources include the ORL's e-newsletter, *Influencing B.C.*, which is published two times a year.

Office of the Registrar of Lobbyists Priorities for fiscal year 2016/17

The ORL has two key priorities for fiscal year 2016/17, which are the same as I reported on in my May 2015 presentation.

1. Enhance the enforcement function under the *Lobbyists Registration Act*.

From 2010 to 2013 the ORL engaged in public education and outreach about the LRA and the requirements of lobbyists to register. Lobbyists have had ample opportunity to be made aware of their obligations regarding registration, especially those lobbyists who are active in public affairs in B.C. Most lobbyists make every attempt to comply with the law. However, there are a small number of lobbyists who do not exercise due diligence.

This is why we decided two years ago to conduct an increasing number of formal investigations and apply administrative penalties more frequently. ORL compliance investigations can involve multiple lines of inquiry and consume significant staff time. To ensure we can meet the ORL's growing investigative activity, we continue to use OIPC investigators to conduct ORL investigations. This has enabled us to take advantage of economies of scale and fulfill the functions of both offices more efficiently.

2. Implement the public education strategy.

Several elements of the public education plan have already been implemented, including an in-depth analysis of the current ORL website and a survey of e-newsletter readers and website visitors.

In late 2015 and early 2016, we will also enhance our media relations activities, authoring articles about lobbying and introducing a story bank on the ORL website for media outlets to utilize.

In addition, we are researching the feasibility of hosting webinars and workshops, as well as an ORL Twitter account. The emphasis, as we continue to implement the public education plan over the coming year, will be on monitoring the individual needs of each target population, as familiarity with the LRA and the ORL varies widely between each group. Our goal will be to clarify procedures and requirements, thereby increasing compliance with the LRA.

For those Committee members who were present last year, you may recall that a former priority was legislative changes in the *Lobbyists Registration Act*. Without repeating all the proposals again, I would just draw to this Committee's attention that many of these suggestions would make it easier for lobbyists to comply with the law, and would thus save lobbyists and my office time and money. I am particularly concerned that the current design requires lobbyists to identify whom they *expect* to lobby, rather than have *actually* lobbied. This causes significant compliance and enforcement costs which I think can be avoided.

These legislative proposals remain with the government.

Mandate of the Office of the Information and Privacy Commissioner

The OIPC is the independent oversight agency responsible for monitoring and enforcing compliance with two statutes, the *Freedom of Information and Protection of Privacy Act* ("FIPPA") and the *Personal Information Protection Act* ("PIPA").

Under FIPPA, the OIPC enforces compliance with access and protection of privacy legislation by more than 2,900 public bodies in British Columbia, including ministries, Crown corporations, health authorities, municipalities, self-governing professions, universities and school districts.

In discharging its mandate, the OIPC investigates and mediates access appeals and privacy complaints; conducts formal hearings; issues binding orders; comments on the access and privacy implications of proposed legislation, programs, policies and technologies; and educates the public about their access and privacy rights and public bodies about their legal obligations.

The work of the OIPC is to ensure that decisions and actions of public bodies remain open and accountable, and that public bodies properly control and manage the personal information of citizens which they collect in order to deliver public services.

PIPA sets the rules that private sector organizations, including businesses, labour organizations, interest groups and non-profits must follow in the collection, use and disclosure of customer, client and employee personal information. Similar to its duties under FIPPA, it is the OIPC's responsibility to enforce compliance of PIPA by the estimated 300,000 private sector organizations in British Columbia.

Under PIPA, the OIPC investigates complaints, adjudicates disputes and educates and informs the public about their consumer and employee privacy rights, and organizations about their privacy responsibilities.

OIPC Major Accomplishments to date for 2015/16

In this section, I would like to highlight the major accomplishments the OIPC was able to produce, to date, with the funding the Committee recommended last year.

Once again, this material represents an update on the presentation to this Committee of May 13, 2015.

Addressing the Backlogs at Investigation and Adjudication

Investigation is the first stage of our process when we receive a complaint or appeal. This work is generated by citizens or consumers who are making privacy complaints or are requesting appeals of decisions of public bodies or organizations in response to their access requests under FIPPA and PIPA.

An investigator attempts to resolve the matter informally either by working with all parties to achieve consensus about the disposition of a file or by issuing informal findings. It can be long and arduous work bringing parties to a consensus, especially given that often the reason these parties are before us is because their relationship is often broken. Investigators resolve about 96% of all complaints and appeals. The remainder go forward to adjudication.

Adjudication is the second stage of our process, which involves a formal written hearing or inquiry involving the parties. These are mostly **access** requests that proceed to adjudication, as investigators resolve nearly all privacy complaints. Adjudicators hear cases under both FIPPA and PIPA. All parties make formal written submissions, often with the aid of legal counsel, and an adjudicator, or the Commissioner, deliberates on the submissions and issues a binding decision.

As I stated last November, and reinforced in my May 2015 report to this Committee, addressing the backlog of demand for our services is my number one priority this year.

We have addressed the backlogs by realigning our resources and conducting a continuous improvement process review to ensure that we are working as efficiently and as effectively as possible.

This new process involved streamlining of case file management, new policies with respect to the opening and closing of files, and strategies to ensure that all complaints have fair and timely access to our resources. We have established performance targets and measures to evaluate our success and we will be reporting to you at future presentations. We have also taken measures to streamline our adjudication processes.

Our new process commenced October 31, 2105, so we do not yet know its full impacts.

I indicated in May 2015 that we were hiring three new investigators. They are now in place. One replaces a vacancy. I created another by re-allocated resources. The third is the position that the Committee approved funding for in November 2014. They are now carrying a full caseload and assisting us in dealing with the investigation backlog.

So for this year we have received 594 new investigation files and closed 532. We have received 59 new adjudication files and closed 59.

Major Policy and Investigation Reports

1. Investigation Report – F15-03 – Access Denied: Records Retention and Disposal Practices of the Government of British Columbia.

This report was issued October 22, 2015.

This investigation addresses an allegation by an employee, who had identified emails as potentially responsive to an access to information request, which his supervisor deleted from his email system. It also explores whether there is a systemic issue within the Government regarding the retention and disposal of records that are not transitory in nature and are, or may be, responsive to access to information requests under the FIPPA.

The investigation found there were various breaches of the obligations imposed by Section 6(1) of FIPPA to assist applicants and to respond in an open, accurate and complete way. It also found that it was more than likely that the employee concerned deleted the emails as alleged.

2. Investigation Report F15-01: a review of the use of employee monitoring software by the District of Saanich

This report was issued March 30, 2015.

I initiated an investigation to determine whether the use of employee monitoring software by the District of Saanich complied with FIPPA. The software tools used by the District included keystroke logging, automated screen shots and continuous tracking of computer program activity.

The investigation found that use of these software tools violated the privacy rights of employees because the collection of personal information was not necessary for a program or activity of the District. I recommended that the District disable the monitoring software and destroy all data collected by the software. I also recommended that the District implement a comprehensive privacy management program to ensure it meets all of its obligations under FIPPA.

3. Investigation Report F15-02: a review of the Mount Polley mine tailings pond failure and public interest disclosure by public bodies.

This report was issued July 2, 2015.

The investigation commenced in response to several complaints to our Office stating that government had information about a risk of harm posed by the tailings pond dam at the Mount Polley Mine that it should have disclosed to the public prior to the breach, as required by s. 25 of FIPPA. Our investigation did not find evidence that government had information about a risk of significant harm. However, this investigation raised questions with respect to determining when disclosure is “clearly in the public interest”.

I recommended that all public bodies diligently and promptly assess what information they have that must be disclosed pursuant to s. 25 and that they develop policies that provide guidance to employees and officers about the public body’s obligations under s. 25.

4. Submission to the Special Committee reviewing FIPPA

FIPPA requires that a Special Committee of the Legislative Assembly review the legislation once every six years.

I made a first presentation to the Special Committee on July 21st, 2015, when I encouraged the Committee members to consider global legislative trends and the challenges presented by the acceleration in the use new technologies.

I made a second presentation to the Special Committee on November 18, 2015. She made recommendations for amendments to FIPPA including: creating a duty to document key decisions; a legislative requirement for privacy management programs – including breach notification and reporting; and oversight over destruction of records.

Other Major Initiatives

1. Implementation of the Audit Program

As I announced in our 2014/15 budget submission, we launched in 2014 our Audit and Compliance Program to proactively assess the extent to which public bodies and private sector organizations are protecting personal information and complying with access provisions under BC's legislation. The program emphasizes organizational accountability in policies, procedures, systems and controls. We posted online an audit charter that lays out the step-by-step process for how the audit team conducts assessments.

We released the first audit report in January 2015 and the second in September 2015. Both of these projects included examinations of privacy breach management practices – first, in the BC Government and, second, in health authorities across BC.

We found that the BC Government has a strong foundation for breach management but was lacking in compliance monitoring. In the health authority examination, we found that health authorities would benefit by ensuring privacy offices have the appropriate tools; conducting regular audits and compliance monitoring activities; and mandating regular refresher privacy and security training. In addition, in both of these examinations, I recommended that all suspected breaches be reported to my Office whenever there is potential for harm or a large number of individuals may be affected.

2. Guidelines and Education

Following the investigation into the IT practices of the District of Saanich, in June 2015, we released a new guidance document for public bodies seeking to implement information technology (IT) security tools in the workplace. There is a right to privacy in the workplace, and this document gives an overview of the issues employers should consider before implementing IT security tools that collect employee personal information.

We also updated a popular OIPC guidance document, *Privacy guidelines for strata corporation and strata agents*. The guidelines have been updated to clarify how personal information should be treated when strata corporations receive requests for correspondence related to a complaint.

We produced two joint guidance documents in conjunction with the federal and Alberta Commissioners' offices. The first identifies some of the privacy considerations law enforcement authorities should take into account when deciding whether to outfit law enforcement officers with body-worn cameras. The second helps employers decide whether Bring Your Own Device is right for their organization, including a thorough assessment of the privacy risks.

On November 12-13, 2015, we hosted *Privacy and Access 20/20: The Future of Privacy* at the Coast Coal Harbour hotel in downtown Vancouver. This two-day conference provided more than 350 public and private sector participants with a greater understanding of the key emerging issues including: big data, national security and surveillance, genetic privacy, privacy and robotics, the right to be forgotten, youth privacy and cyberbullying, big data and political parties, the connected car, and digital identities.

3. Collaboration with other Privacy and Data Protection Authorities

In May, we joined 29 privacy regulators from around the world to participate in the third annual Global Privacy Enforcement Network (GPEN) sweep, which took a close look at nearly 1,500 websites and apps popular with children to assess how much personal information was being collected by the companies and what privacy controls were in place.

We found that two-thirds of the websites children visit collect personal information; unfortunately many of those websites fail to explain in child-friendly terms what personal information is being collected or how it might be shared. We followed up with websites where our sweep results revealed privacy concerns to reinforce that privacy law requires that organizations have a privacy policy that explains what personal information is being collected, for what purpose, and whether that information will be shared with outside parties.

OIPC Priorities for fiscal year 2016/17

1. Reduce the current backlog of complaint and appeal files

As it was in my budget submission last year at this time, and updated in our May 2015 mid-year report, the highest priority for my Office for the next fiscal year will be to continue to reduce the backlogs for the investigation and adjudication functions my Office is responsible for. As of today, we have 240 files awaiting assignment at investigation and 80 files awaiting assignment to an adjudicator.

Last year at this time, November 25, 2014, the numbers were 220 investigation and 90 adjudication files.

These backlogs are the result of a surge of complaints and appeals. We experienced an increase of almost 33% between 2012/13 and 2013/14. While we had a 12% decrease in 2014/15 from the historical high mark in 2013/14, it was still an increase of 16% over 2013/14. I anticipate that the demand for the services of our Office will continue to remain high.

There are 12 employees and one part time contractor dealing with investigations. Each investigator carries a caseload of about 30 files. We have determined through experience that this is the number most investigators can manage most efficiently. A backlog results when all investigators are carrying a full caseload. The files in the backlog remained unassigned until investigators close one of their existing files.

The statistics dealing with **investigations** are as follows:

Fiscal Year	Number of Files at beginning of year	New Files Received	Files closed during year	Number outstanding at Year-end
2012/13 actual	401	1,165	1,205	361
2013/14 actual	361	1,536	1,311	586
2014/15 actual	586	1,354	1,311	629
2015/16 est.	629	1,188	1,064 ¹	751

Owing to staff turnover and hiring lag over the last year, the average delay in waiting for a file to be assigned to an investigator has increased from 20 to 24 weeks. The files take on average 15 weeks to resolve. Therefore, most citizens are waiting 39 weeks for their complaint or appeal to be resolved. As the new investigators that came on board in June 2015 gain experience, we anticipate that they will reduce this wait time by eight weeks.

There are four employees and one part-time contractor dealing with adjudications. The Commissioner hears inquiries when there is a new area of interpretation of the law.

¹ This is an annual projection based on the number of closed files being 532 at the mid-year mark. We anticipate the actual year end number to be higher for three reasons. The first is that we had staffing lags owing to the resignation of a permanent investigator and the hiring of their replacement, along with the new investigator, for which we received additional funding this year, and another investigator. As these employees were not in place until June, we were short the equivalent of .5 FTE averaged over an entire year. The second is the new employees have taken time to train and get up to speed with respect to closing files. As a result, they do not close files at the same rate as experienced investigators. The third is that our continuous improvement process review involved a considerable investment of time by our investigative team. This took time away from their case load. These processes are now complete and I anticipate that both veteran and new investigators will be closing files at a higher rate over the course of the remainder of the year and that we should close more files than projected.

The statistics dealing with **adjudications** are as follows:

Fiscal Year	Number of Files at beginning of year	New Files Received	Files closed during year	Number outstanding at Year-end
2012/13 actual	37	84	69	52
2013/14 actual	52	112	66	98 ²
2014/15 actual	98	86	99	85
2015/16 est.	85	118	118	85

As the result of hiring an additional adjudicator and with existing adjudicators developing increased expertise, we closed 99 files in 2014/15, an increase of 50% over the previous year. The average delay in receiving a binding adjudication decision is now down to 45 weeks. This means that the 4% of files that reach adjudication, citizens have to wait approximately 84 weeks for a resolution. If there is a judicial review, they must wait yet another year. We are projecting another 20% increase in closed files by the end of this year. However, we are also expecting a 38% increase in the number of new files.

Since these backlogs continue to be my top priority for the coming fiscal year, we are currently addressing these backlogs within our current resources – by such initiatives as more training of new employees, hiring co-op students to assist in the research, realigning internal resources and streamlining administration processes wherever possible.

However, as I will return to in our budget request, in the case of investigations, we are unable to deal with the large volume of new files received in the last year and a half without additional staff resources.

Should one of the parties disagree with our adjudicator's decision, they can seek leave to appeal the decision to the Supreme Court of British Columbia. Thus the third and often very expensive step is judicial review. In 2015/16 there were nine outstanding judicial reviews, three initiated by government, four by other public bodies, one by third parties and one initiated by an applicant.

² Our case tracking system volumes were double checked as part of our continuous improvement process and this resulted in a decrease of one in New Files Received, an increase of two in Files Closed and a resulting decrease of three in the Number of Files outstanding at year-end compared to last year's table.

2. Increase the implementation by public and private sector organizations of effective privacy management programs in place

As was outlined in last year's Budget Submission, an emphasis on having Privacy Management Programs in place is the second highest priority.

For public agencies and private organizations, understanding how to comply with privacy laws can be challenging, technical, complex, and at times opaque. B.C. is one of a growing number of privacy regulators seeking to achieve greater compliance with the law by encouraging organizations to **proactively** adopt effective privacy management programs across the organization. In this approach, the onus is on the organization to be aware of, and comply with, the law rather than relying on a regulator to verify compliance or to attend once a major problem is found.

This is very similar to how regulators in other areas, such as banking and aviation are proceeding – it is a very effective (and lower cost) approach.

This approach gives governments and businesses the opportunity to be proactive in addressing privacy concerns of citizens and customers, and gives regulators a consistent framework or yardstick by which to measure overall compliance.

Canada's privacy commissioners have published detailed guidance for the private sector to build privacy into an organization's foundation, promote compliance and demonstrate to regulators, governments and customers that they take privacy seriously. The B.C. office has also developed step-by-step guidance for the public sector.

During the coming year, we will be seeking to promote our accountability document in various forums. We intend to use training sessions, workshops and presentations to highlight, for a variety of audiences, the existence of this guidance and the reasons why it is essential for public bodies and organizations to implement it.

We will continue to assess the overall privacy management programs of public bodies and private organizations in the course of our systemic investigations, and we will also seek to implement an accountability lens to our new audit and compliance program. We will use the standards that we have incorporated in our guidance documents as the measure to evaluate compliance.

By announcing our intention to conduct audits, such as the ones on breach management that we completed this year, and compliance reviews based on our guidance documents, public bodies and organizations may see the incentive of conducting reviews on their own operations and following the step-by-step

guidance to implement accountable privacy management in advance of any audit or review that we might conduct.

3. Promote increased access to information through cultural change and professional information management.

Last year my third priority was to promote the adoption of OIPC recommendations for regulatory reform. The results of my investigations over the last year have persuaded me that there is a more pressing need to improve access to information. A series of systemic investigations that the OIPC has conducted have provided evidence that, 22 years after the implementation of FIPPA, public bodies frequently are not meeting their duty to assist applicants by responding, openly, accurately and completely and without delay. There are multiple instances of a lack of documentation, employees not turning over records subject to FIPPA requests, response to access requests beyond statutory timelines and a lack of proactive disclosure of information where it would be in the public interest among many public bodies.

The original designers of the legislation spoke of the goal of establishing a culture of openness. While government has taken some initiatives, such as promoting open data, this important goal remains unfulfilled.

I plan on conducting further investigations into access issues and to use the audit program to evaluate the extent to which public bodies are responding openly accurately and completely and without delay to access requests.

As discussed above, my Office plays a significant role in the review of FIPPA that is statutorily required every six years. As well as my testimony before the Special Committee for that review, my Office provides detailed recommendations for reform and comments on the reform submissions provided by other organizations and individuals.

I will continue to monitor the responses to my recommendations and promote the public benefits of bringing regulations up to date.

Budget Request for fiscal year 2016/17

The budget for my two offices currently breaks down as follows: 68% is for salaries and benefits; 8% is for professional services; 18% is for fixed costs such as our shared services costs, rent, and utilities; 5% is for operating expenses like amortization and office expenses and 1% is for travel.

We have a staff compliment of 35 positions, plus the position of Commissioner. Consequently, our management discretion to deal with further mandated cost increases has to come primarily from salaries (*i.e.*, not hiring staff) or a reduction in outside professional advice, such as legal advice.

The year before last I sought a \$72,000 (1.3%) budget increase to cover cost increases which the Committee decided not to approve. I dealt with these cost increases by reducing legal advice, by not filling vacant positions, and by deferring activities in our strategic plan. At the end of 2014/15 our budget came in at 99.8% of our allocation.

Last year, I indicated in my presentation that we faced further unavoidable cost pressures for 2015/16 of \$303,000. I was able to manage my budget within the same funding as 2014/15, by reducing travel and contracted professional services, and, with the approval of the Committee, reallocating surplus funds dedicated to legal services for judicial reviews. The Committee approved additional funding for a new investigator. Our 2015/16 budget is again very tight, and based on our best projections, we expect to expend 99% of our allocation.

Since my budget is very tight, I have very limited ability to deal, next year, with unavoidable cost increases other than by not hiring vacant positions.

For the forthcoming fiscal year 2016/17, my Office is again faced with an adjustment to cover government mandated salary increments and adjustments for Schedule A (union-classified) and the Commissioner and for our Shared Services costs – voice, data, building and electricity increases. This amounts to unavoidable increases of \$98,000, compared to our 2015/16 estimates.

We were able to absorb similar cost pressures in 2015/16 by exhausting the flexibility in our budget and with the decision of the Committee to remove restrictions on the use of judicial review funds. This is not an approach that I am able to continue, without cutting into staffing resources. Therefore, this year I am requesting a funding increase to cover these new and ongoing costs pressures.

As I mentioned in my presentation in May 2015, my number one priority is to improve service to citizens. I have indicated previously that I consider the higher number of complaints and reviews that my Office has received in recent years to be the new norm. I am thankful to the Committee for recommending an increase to my budget last year that enabled me to hire an additional investigator.

As noted on page 8 of this submission, in addition to devoting more resources to investigation and adjudication, I have been conducting in-depth reviews of our existing processes to find ways to enable us to improve service to citizens by closing more files faster. I am doing everything within my power to improve the timeliness of our work.

However, it is not just a matter of numbers of files. It is also a matter of increasing complexity. As technology is becoming more advanced the privacy and access issues are becoming more complicated. We have had a number of files this year that required special expertise and extraordinary expenditure. As the files at investigation become more complex, so do the files that proceed to adjudication. This also impacts timeliness, as the longer it takes to close a file, the longer before the next file is opened.

In the case of the District of Saanich, we had to investigate the installation of spyware on the personal computers issued by the Mayor and staff. This required technical expertise with respect to the analysis of systems security software.

In the case of the hard drive containing student level data that the Ministry of Education lost, we have to conduct a forensic examination of a duplicate hard drive.

In the deleted email investigation, we had to seize computers and conduct a forensic examination to determine whether certain emails had previously existed. In addition, owing to the nature of the issues under investigation, we needed to interview witnesses under oath and record testimony using a court reporter. This lengthened the investigation process and significantly increased unforeseen costs to our office. I estimate that the extraordinary costs relating to IT, legal, and administrative support to be \$35,000.

As a result of this increasing complexity of investigations, we continue to face an unacceptably high level of outstanding investigation and adjudication case files. This is despite the increase in resources and efficiency measures I have implemented. With incoming complaints showing no sign of abating, wait times remain unacceptable.

Similar to the evidence I produced last year, an additional investigator would immediately reduce the backlog from 240 files to 210, as they would take 30 files out of the backlog and begin actively investigating them. As investigators close an average of six files per month, a new investigator would close 72 files (their original 30 plus 40 new files) over the course of the year. By the end of the year, this would reduce the backlog further and enable us to deliver faster outcomes to citizens by decreasing the average wait time by one month, which constitutes a significant reduction of 20%.

An additional adjudicator would be able to close 20 files per year. With the current backlog at 80, this would result in a 25% decrease in the first year. If the annual case load of adjudications remains steady, we should be able to eliminate the adjudication backlog within four years.

Therefore, I am asking for one additional investigator position and one additional adjudicator position with corresponding salary and benefit costs in the amount of \$230,000.

The combined budget request is for an increase of \$328,000 for a total budget request of \$5,964,000. This represents an operating budget increase of 5.8% compared to both the current and previous fiscal years.

I note that, last year, my projection of my budget for future years was based on the assumption of the financial and staffing status quo. The changes that I have proposed for the 2016/17 budget are the result of mandated salary, benefits, voice and data, building and electricity increases not known at this time last year plus a request for the two new staff.

The existing 2014/15 capital budget in the amount of \$45,000 is an adequate level for 2015/16.

In order of my priority, I ask consideration of the Committee for:

1. Funding to cover unavoidable increases in salary, benefits, voice and data and building and electricity costs netting at \$98,000;
2. Funding for an additional investigator to help reduce the backlog of files in the amount of \$110,000; and
3. Funding for an additional adjudicator to help reduce the backlog of files in the amount of \$120,000.

In total, this represents a requested operating budget of \$5,964,000 and a capital budget of \$45,000 for 2016/17.

November 19, 2015

ORIGINAL SIGNED BY

Elizabeth Denham
Information and Privacy Commissioner
for British Columbia
and Registrar of Lobbyists

Information and Privacy Commissioner/Office of the Registrar of Lobbyists

Statement of Operations**Previous and Current Fiscal Years**

Funding	Fiscal 2014/15 (previous year)		Fiscal 2015/16 (current)
	Budget	Actual Expenditure	Budget
Voted Appropriation	5,526,000	5,514,401	5,636,000
Total	5,526,000	5,514,401	5,636,000
Expenses			
Salaries	3,090,000	3,223,921	2,981,000
Employee Benefits	655,000	704,855	803,000
Travel	67,000	66,746	52,000
Professional Services			
General Contracts	429,000	433,746	443,000
Judicial Review	300,000	117,062	-
Information Systems	97,000	86,450	80,000
Office and Business Expenses	113,000	144,253	97,000
Informational Advertising & Publications	25,000	150	-
Statutory Advertising & Publications	18,000	11,031	15,000
Utilities, Materials and Supplies	16,000	24,862	23,000
Operating Equipment & Vehicles	12,000	4,493	-
Amortization	157,000	138,742	120,000
Building Occupancy	552,000	558,090	578,000
Other Expenses (85)	-	-	447,000
Internal Recoveries	(3,000)	-	(1,000)
Other Recoveries	(1,000)	-	(1,000)
External Recoveries	(1,000)	-	(1,000)
Total Expenses	5,526,000	5,514,401	5,636,000
Capital Budget			
Information Systems, Furniture & Equipment	45,000	16,991	45,000
Total Capital	45,000	16,991	45,000

Proposed Budget by Standard Object of Expenditure (STOB)

STOB	Expense Type	Fiscal 2015/16 (current) Budget	Fiscal 2016/17 (Proposed) Estimates	Change 2015/16 to 2016/17	Fiscal 2017/18 Planned	Fiscal 2018/19 Planned
50	Salaries	2,711,000	2,893,000¹	182,000	2,921,000	2,949,000
51	Supplemental Salary					
52	Employee Benefits	803,000	850,000¹	47,000	857,000	864,000
54	Officer of the Leg. salary	270,000	283,000²	13,000	286,000	289,000
57	Travel	52,000	52,000		52,000	52,000
60	Professional Services	443,000	475,000³	32,000	480,000	485,000
63	Information Systems	80,000	98,000³	18,000	99,000	100,000
65	Office and Business Expenses	97,000	150,000⁴	53,000	152,000	154,000
68	Statutory Advertising & Publications	15,000	12,000⁵	(3,000)	12,000	12,000
69	Utilities , Materials and Supplies	23,000	26,000⁶	3,000	28,000	30,000
73	Amortization Expense	120,000	39,000⁷	(81,000)	39,000	39,000
75	Building Occupancy	578,000	615,000⁸	37,000	621,000	627,000
85	Other Expenses	447,000	474,000⁹	27,000	479,000	484,000
88	Internal Recoveries	(1,000)	(1,000)		(1,000)	(1,000)
89	Other Recoveries	(1,000)	(1,000)		(1,000)	(1,000)
90	External Recoveries	(1,000)	(1,000)		(1,000)	(1,000)
	Total	5,636,000	5,964,000	328,000	6,023,000 ¹¹	6,082,000 ¹²
Capital Budget						
	Info. Systems, & Furniture & Equip.	45,000	45,000 ¹⁰		45,000	45,000
	Total	45,000	45,000		45,000	45,000

1. STOB 50 (Salaries) and STOB 52 (Employee Benefits)—Includes salaries for existing staff positions, the known financial impact of the salary increases for Schedule A (Union classified).
2. STOB 54 (Officer of the Legislature Salary)—The salary for the Officer is set by statute, as equal to the salary of the Chief Judge of the Provincial Court
3. STOB 63 (Information Systems)—Includes data lines, IDIR accounts, voice services, software licensing, data communication, network security and supplies.
4. STOB 65 (Office & Business Expenses)—Includes costs for office stationary and supplies, offsite file storage, postal and courier charges, printing expenses (other than reports), news subscriptions, staff training, photocopier leases, and business meeting expenses.
5. STOB 68 (Statutory Advertising & Publications)—Includes the cost for preparing and printing the Annual Report to the Legislature.
6. STOB 69 (Utilities, Materials & Supplies)—Includes the cost for utilities, recycling, books and supplies.
7. STOB 73 (Amortization)—Is the cost of repaying the Capital budget expenditures for information systems hardware and software, tenant improvements and office furniture. Expenditures for information systems are amortized over three or five years depending on nature of the purchase. Expenditures for tenant improvements and office furniture are amortized over five years.
8. STOB 75 (Building Occupancy)—This is the proportionate share of the costs associated with the office space of the four Independent Offices located at 947 Fort Street. Operating costs (e.g., building insurance, hydro, property taxes and maintenance) are anticipated to increase in fiscal in subsequent years. The rate for base rent has increased in fiscal year 2015/16.
9. STOB 85 (Other expenses)—The amount contributed toward the operations of Corporate Shared Services (Services include: information technology, finance, human resources, facilities and reception).
10. CAPITAL BUDGET—This is for the purchase of information systems hardware and software and office furniture, and is consistent with the Capital budget in fiscal year 2015/16. Capital amounts are repaid through amortization expense in STOB 73.
11. FISCAL 17/18 PLANNED—This assumes a status quo budget with known increases for salary and benefits for Schedule A (Union classified) and utilities, plus an estimate for inflation of 1%, based on the consumer price index, for STOB 60, 63, 65, 75, 85, and salary related costs.
12. FISCAL 18/19 PLANNED—This assumes a status quo budget with known increases for salary and benefits for Schedule A (Union classified) and utilities, plus an estimate for inflation of 1%, based on the consumer price index, for STOB 60, 63, 65, 75, 85, and salary related costs.

Proposed Budget by Business Area (\$,000)

Business Area	Current Year	Proposed		
	Fiscal 2015/16	Fiscal 2016/17	Fiscal 2017/18	Fiscal 2018/19

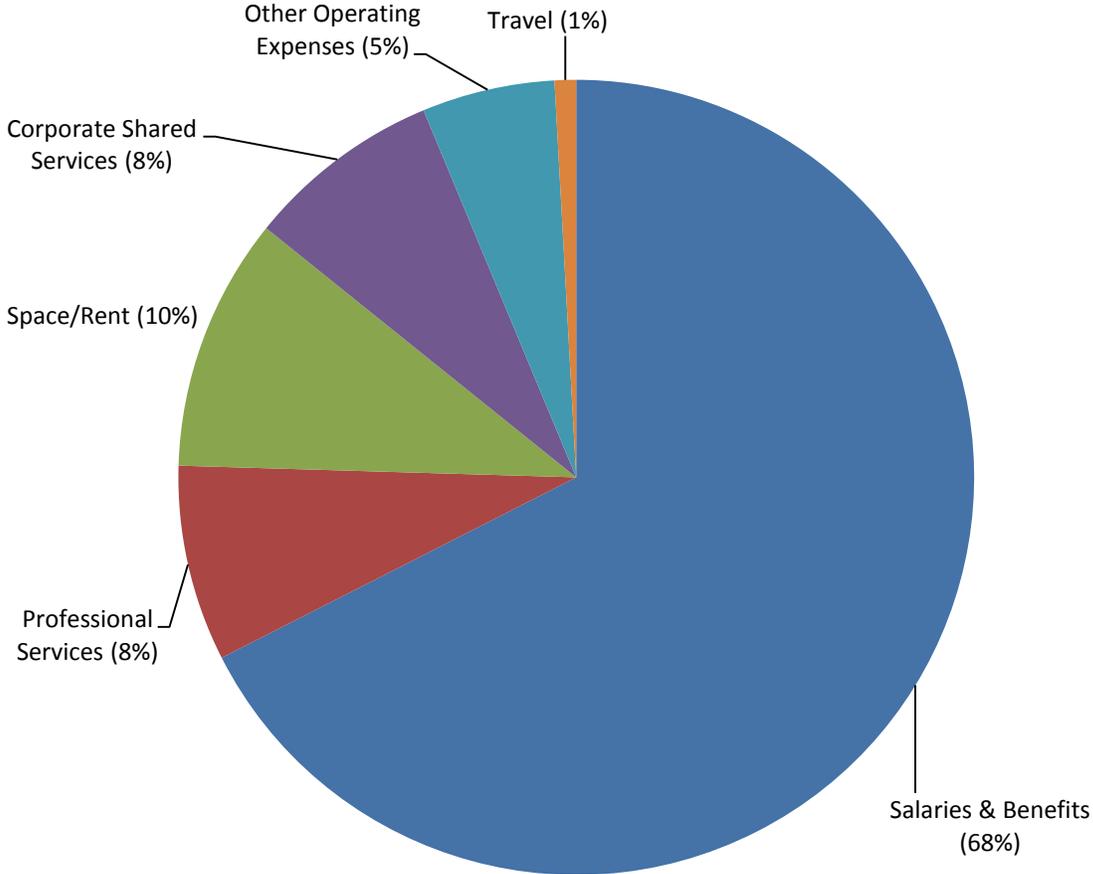
Operating Expenditures (Consolidated Revenue Fund)

Core Services:				
- Public Sector Information & Privacy	3,428	3,627	3,663	3,698
- Private Sector Privacy	1,161	1,228	1,240	1,253
- Lobbyists Registration	600	635	641	647
Total Core Services	5,189	5,490	5,544	5,598
Corporate Shared Services	447	474	479	484
Total	5,636	5,964	6,023	6,082

Capital Expenditures (Consolidated Revenue Fund)

Info. Systems, furniture & equipment	45	45	45	45
Total	45	45	45	45

Fiscal 2016/17 Proposed



* Other Operating STOBs includes information Systems (63), Office Expenses (65), Reporting (67 and 68), Utilities (69) and Amortization (73)



OFFICE OF THE
INFORMATION &
PRIVACY COMMISSIONER
for British Columbia

Protecting privacy. Promoting transparency.

O.R.L.
office of the
registrar
of lobbyists
BRITISH COLUMBIA

Service Plan

Fiscal Years 2016/17-2018/19

Presented to:

Select Standing Committee on Finance
and Government Services
Legislative Assembly of British Columbia

November 19, 2015

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Message from the Information and Privacy Commissioner and Registrar of Lobbyists

Access to information, privacy and transparency are at the heart of current events in British Columbia – from large-scale breaches of personal information, to the records management practices of government, to lobbying. The high public profile of these issues, combined with technological advances and global trends, has led to an increase in the volume and complexity of our workload.

As Information and Privacy Commissioner, I issued seven major reports and eight guidance documents in the past year. Our most significant investigation report focussed on the records retention and destruction practices of government, including the alleged destruction of emails by an employee of the Minister of Transportation and Infrastructure.

We also issued two audit reports about privacy breach management, an investigation into the use of employee monitoring software by the District of Saanich, and the disclosure of information in the public interest related to the Mount Polley Mine tailings pond spill.

Some of these investigations were the result of complaints by members of the public; others were initiated proactively in the public interest. A number of these investigations required special expertise and extraordinary expenditure to complete.

In the case of the District of Saanich, we engaged technical expertise to analyze systems security software. In the case of the current investigation into the Ministry of Education's lost hard drive containing the personal information of more than three million British Columbia students, a forensic examination of a duplicate hard drive is underway. In the Mount Polley investigation we retained a professional engineer with experience in the design and operation of tailings dams to assist staff in reviewing documents in order to assess whether they contained information about a risk of significant harm to the environment or the public, which would trigger the proactive disclosure requirements of section 25 of FIPPA.

And in the investigation of deletion of emails by the Ministry of Transportation and Infrastructure, we conducted forensic examinations of computers and metadata to determine whether certain emails had previously existed. We also interviewed witnesses under oath and recorded testimony using a court reporter. This lengthened the investigation process and significantly increased unforeseen costs to our Office.

As technology continues to advance, and access and privacy issues become increasingly more complex, I anticipate a continued need to rely on specialized and technical assistance in future investigations. In addition to an increased complexity of files, my Office continues to face significant case volumes. We have a backlog of

privacy complaints and appeals of access to information requests, with a wait of up to six months for service.

These delays are not acceptable to citizens and they are not acceptable to me. In order to continue to meet public expectations for timely service, we have realigned existing resources to add two additional investigators and one additional adjudicator to our staff complement.

We also recently completed a continuous improvement process to ensure that we are working as efficiently and as effectively as possible, and ensure fair and timely access to our services for all complainants. This involved streamlining of case file management, implementing new policies with respect to the opening and closing of files, and strategies to ensure that all complainants have fair and timely access to our resources. We have also taken measures to streamline our adjudication processes.

While I am confident these changes will help us find efficiencies within our current footprint, additional staff resources will be needed in order to make meaningful progress in the reduction of our case backlog.

Despite these challenges, we continue to be productive. During fiscal 2014/15, the Office of the Registrar of Lobbyists saw the timeliness of lobbyist registrations sustained at the previous year's level of 95%. We completed 160 compliance reviews and 13 formal investigations, an increase of one over the previous year.

The OIPC public education program is ongoing. We continue to deliver speeches and participate on panels at conferences. We deliver specialized training sessions to access and privacy professionals, as well as line staff in a broad range of local public bodies and organizations. We continue to expand our use of social media, including a new blog and public engagement through our Twitter account, @BCInfoPrivacy.

Earlier this month, we hosted a special conference, *Privacy and Access 20/20: The Future of Privacy*, in Vancouver, which provided more than 300 public and private sector participants with a greater understanding of emerging privacy issues including: big data, national security and surveillance, genetic privacy, robotics, the right to be forgotten, cyberbullying, the connected car, and digital identities. I anticipate that these issues will continue to be relevant to citizens and privacy practitioners in the coming months and years.

November 19, 2015

ORIGINAL SIGNED BY

Elizabeth Denham
Information and Privacy Commissioner
for British Columbia
and Registrar of Lobbyists

Vision

- A community where privacy is valued, respected and upheld in the public and private sectors;
- A community where access to information rights are understood and robustly exercised;
- A community where public agencies are open and accountable to the citizenry they serve; and
- A community where lobbying is understood, respected, and transparent.

Mandate

Under the *Lobbyists Registration Act* ("LRA"), the mandate of the Office of the Registrar of Lobbyists ("ORL") is to:

- Promote awareness among lobbyists of registration requirements;
- Promote awareness among the public of the existence of the lobbyists registry;
- Manage registrations submitted to the lobbyists registry; and
- Monitor and enforce compliance with the LRA.

Under the *Freedom of Information and Protection of Privacy Act* ("FIPPA") and the *Personal Information Protection Act* ("PIPA"), the mandate of the Office of the Information and Privacy Commissioner ("OIPC") is to:

- Independently review decisions and practices of public bodies and private sector organizations concerning access to information and protection of privacy;
- Comment on the implications for access to information or protection of privacy of proposed legislative schemes, automated information systems, record linkages, and programs of public bodies and organizations; and
- Educate and inform the public about access and privacy rights.

Who we serve

Under FIPPA, PIPA, and the LRA, the Office serves:

- The information and privacy rights of citizens and consumers; and
- The Legislative Assembly of British Columbia.

How we do our work

The ORL addresses concerns about the integrity of government decision-making in that it provides a public record of who is or has attempted to influence government decisions. The ORL manages compliance through an interrelated spectrum of compliance strategies including incentives, education and outreach to lobbyists and public office holders, verification of registration information, public reporting, compliance reviews, investigation and administrative penalties.

The OIPC mediates and investigates access to information appeals and privacy complaints, conducts audits, delivers public education, reviews and comments on the privacy or access implications of legislation, programs or systems, conducts formal hearings and issues binding orders.



Service Plan of the Office of the Registrar of Lobbyists

The ORL seeks province-wide compliance with the *Lobbyists Registration Act* ("LRA") through a series of interrelated compliance strategies. Our approach is built on guidelines recommended in *Lobbyists, Governments and Public Trust*, a report by the Organisation for Economic Co-operation and Development.¹

Compliance Principles

- The purpose of the LRA is to enhance transparency in lobbying;
- Lobbying in British Columbia must comply with legislation and regulations;
- Cost-effective, informal and non-punitive forms of resolving minor matters of non-compliance should be used where appropriate;
- Enforcement activities will be carried out in a fair, objective, respectful and consistent manner;
- Educating the public about the Registry of Lobbyists is critical to achieving the policy objective of transparency; and
- Ongoing dialogue with the stakeholder community – lobbyists, organizations, public office holders, fellow oversight agencies and the public – is essential to ensuring compliance strategies remain timely, cost-efficient and effective.

Goals, Strategies and Performance Measures

Goal 1—Enhance the enforcement function under the *Lobbyists Registration Act*

Informal resolution of possible non-compliance is desirable, and the ORL will continue to use informal measures whenever they are appropriate and effective. However, this is the third year that the Office has conducted an increased number of formal investigations and applied administrative penalties more frequently in an effort to enhance enforcement.

¹ For the complete text of the OECD report, see: <http://www.oecd.org/dataoecd/5/41/41074615.pdf>.

Strategies

- Analyze publicly available information sources to identify government priorities, organization priorities and possible unregistered lobbying; and
- Conduct compliance reviews to identify potential contraventions for formal investigation.

Performance Measure	2014/15		2015/16	2016/17	2017/18	2018/19
	Target	Actual	Target	Target	Target	Target
1. Percentage of on-time registrations	90%	95%	95%	95%	95%	95%
2. Number of compliance reviews	140	160	160	160	160	160
3. Number of compliance investigations	20	13	20	20	20	20

Goal 2—Promote enhancements to the *Lobbyists Registration Act*.

We established this goal last year, in light of feedback from lobbyists and other stakeholders and based on our experience enforcing the LRA from 2010 to 2013. There are a number of ways to enhance the legislation to better meet its primary objectives. The fundamental purpose of the LRA is to create transparency regarding who is attempting to influence government decision making. However, certain features of the current legislation inadvertently undermine the goal of transparency and create barriers to compliance. To address these issues, in my report entitled, “Recommended Changes to the *Lobbyists Registration Act*”² I have made five recommendations for reform.

Strategies

- Raise awareness of the Registrar’s recommendations for reform among lobbyists and the general public.

There is no performance measure for this goal, as the decision will be taken by the Minister of Justice and the Legislative Assembly as to whether to amend the legislation.

² <http://www.lobbyistsregistrar.bc.ca/images/pdfs/ORL%20Recommendation%20Report%205Nov2013.pdf>

Goal 3—Provide education for lobbyists, public office holders and the public

Our public education and outreach activities over the last four years have been largely focussed on making lobbyists and public office holders aware of the LRA and the need to register. This has led to a greater awareness about lobbying legislation in British Columbia among lobbyists, public office holders and the general public. We believe that now it is time to develop specialized public education tailored to the particular needs of different stakeholders.

Strategies

- Develop a comprehensive public education plan for lobbyists, stakeholders and the public;
- Co-host with Simon Fraser University a third conference on lobbying;
- Publish and circulate *Influencing B.C.*, the ORL's online journal;
- Manage and keep current the Office of the Registrar of Lobbyists website; and
- Publish monthly summaries of registered lobbying activities in the province.

Performance Measure	2014/15		2015/16 Target	2016/17 Target	2017/18 Target	2018/19 Target
	Target	Actual				
4. Issues of <i>Influencing BC</i> published	3	2 ³	2	2	2	2

³ We have found that we can only generate enough useful material to fill two issues annually.



Service Plan of the Office of the Information and Privacy Commissioner

Goals, Strategies and Performance Measures

Goal 1—Uphold privacy rights and monitor protection of personal information and data

The goal expands on one of the key priorities we identified in our 2015/16 Budget Submission that accompanies this plan: increase the proportion of public and private sector organizations that have effective privacy management programs in place.

Strategies

- Secure government support for robust privacy rules and guidelines for data linking and information sharing activities of public bodies as a priority initiative;
- Collaborate with government to implement reforms and educate and train public bodies;
- Promote OIPC's privacy management guidance documents; and
- Conduct audits to evaluate privacy management programs of public sector organizations to ensure their effectiveness.

Performance Measure	2014/15		2015/16	2016/17	2017/18	2018/19
	Target	Actual	Target	Target	Target	Target
1. Number of audits, compliance reviews and systemic investigations	10	8	10	10	10	10
2. Percentage of audit, compliance review and systemic investigation report recommendations implemented	95%	95%	95%	95%	95%	95%

Goal 2—Promote and advocate for an open, accountable and transparent public sector

This goal arises from our three-year strategic plan for fiscals 2014/15 through 2016/17.

Strategies

- Increase the number of public bodies that have implemented effective open information programs through a systematic follow up of our open government report recommendations;
- Promote open information through our education mandate and by creating scalable guidance documents based on the open government/open information report;
- Provide support to FOI experts/leaders in public bodies by holding a one day symposium on open government best practices;
- Improve the quality and timeliness of public bodies' responses to access to information requests, by assessing and reporting on the underlying causes for the lack of timeliness responding to access requests; and
- Advocate for information management legislation and policy reform that includes a duty to document, archival standards and explicit disclosure of categories of records.

Performance Measure	2014/15		2015/16 Target	2016/17 Target	2017/18 Target	2018/19 Target
	Target	Actual				
3. Average processing days for all ministries (business days)	20	44	20	20	20	20
4. Percentage of access requests processed on time by all ministries	90%	79%	90%	95%	95%	95%

Goal 3—Ensure public bodies and private sector organizations understand their responsibilities under the law and individuals understand the value of information and privacy rights

Promoting awareness of information rights remains a key goal of our Office. The OIPC will continue to support its education mandate through speaking engagements, interviews, training, conferences and other events.

Strategies

- Meet the growing demand from public bodies and organizations for OIPC speakers and training in FIPPA and PIPA compliance by developing curricula and external resources so that public bodies and organizations can train their own employees;
- Facilitate public awareness of privacy and access rights by developing and implementing social media strategies for stimulating interest and discussion of individual information rights, and implement them with our other communications strategies; and
- Promote access and privacy issues in the public domain by responding to requests for media interviews and seeking out opportunities for public commentary.

Performance Measure	2014/15		2015/16 Target	2016/17 Target	2017/18 Target	2018/19 Target
	Target	Actual				
5. Number of OIPC presentations	100	54	80	80	80	80

Goal 4—Enhance the quality and capacity of the OIPC’s people, systems, processes and culture

Delivering our mandate efficiently and effectively remains a goal of our Office.

Strategies

- Ensure the timely resolution of complaints, reviews, and requests for information by conducting a review of internal processes and standards, and developing best practice guidelines;
- Leverage relationships with functional counterparts at other oversight agencies;
- Create opportunities for skills, knowledge and professional development for OIPC staff; and
- Promote a positive workplace culture, collaboration and engagement among OIPC staff.

Performance Measure	2014/15		2015/16	2016/17	2017/18	2018/19
	Target	Actual	Target	Target	Target	Target
6. Percentage of requests for review settled without inquiry	95%	88%	95%	95%	95%	95%
7. Percentage of review files resolved within 90 business days of assignment	65%	47%	65%	65%	65%	65%
8. Percentage of complaint files resolved within 120 business days	75%	66%	75%	75%	75%	75%
9. Average number of orders and other decisions produced per adjudicator per year	22	16	22	22	22	22

Caseload Statistics: Office of the Information and Privacy Commissioner

File Type	Fiscal 2012/13	Fiscal 2013/14	Fiscal 2014/15
Appeals (requests for review)	618	780	676
Complaints	443	642	546
Requests for time extensions	735	853	721
Policy consultations	135	140	172
Review of legislation	56	38	54
Speeches and presentations	80	86	54
Privacy breach reviews	106	114	132
Other ⁴	1,512	1,783	1,641
Total Case Files	3,685	4,436	3,996

Informal requests for information and assistance	2,686	2,938	4,489
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⁴ Other file types include media inquiries, conference attendance, projects, and courtesy copies of letters not requiring a response.