



eComments at Ecology: Helping us hear from the people of Washington

2019 NASCIO Award Nomination

Category

Digital Government: Government to Citizens

Nomination submitted by

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Executive Summary

The Washington State Department of Ecology protects and restores land, air and water. We also prevent pollution; promote healthy communities and natural resources; and deliver efficient and effective services. Ecology is committed to transparency, and much of our work includes public input.

We are committed to involving the people of Washington in a meaningful way on topics and decisions that affect our state. To accomplish this we needed an adaptable system for collecting input from people participating in public processes. Our old method was inefficient and unreliable. We wanted a robust system that would accept comments 24-hours a day.

After evaluating various options, Ecology identified a software as a service (SaaS) solution and chose a vendor (SmartComment Software) to work with us in addressing our specific needs.

Our new system provides:

- Friendly and easy-to-use customizable interfaces.
- Cloud-based solutions, so no infrastructure investment is required.
- Consistent processes for managing public comments.
- Tools and templates that produce a variety of reports.
- Availability 24-hours a day from any computer, phone, or tablet.

It has resulted in:

- Reduced staff time for manually processing comments.
- A much easier way to manage records.

The new system, eComments, manages, processes, and organizes a high volume of comments received by Ecology for multiple types of projects.

Hearing from Washingtonians



Concept

The Washington State Department of Ecology is proud to protect, preserve, and enhance Washington's environment for current and future generations. We balance the resource demands of today's growing population and economy, preventing and cleaning up polluted places, and planning for future generations of people, fish, and wildlife. We:

- Protect and restore land, air, and water;
- Prevent pollution;
- Promote healthy communities and natural resources; and
- Deliver efficient and effective services.

Ecology oversees many state and federal laws designed to protect Washington's land, air, and water; and has authority to implement and enforce various environmental laws and rules. Employees in our 12 environmental programs manage complex regulatory projects, oversee grant and loan programs, engage in scientific research, and provide technical assistance. We accomplish this through open and transparent public processes and by ensuring compliance with environmental laws and rules.

Over the past decade, as technology made it easier for people to provide electronic input, our methodologies for accepting written comments did not keep up. Ecology reached a point where the antiquated methods used to accept, sort, catalog, and organize comments encroached on time needed to consider and evaluate them. This is important because public comments can be an important source of information - they may be relevant to permitting decisions, and can lead to technical adjustments in proposed regulations.

Background

Ecology holds hundreds of public comment periods each year. They vary in length, with most comment periods remaining open for about 45 days. At any time, we may be accepting comments for several dozen different projects. During some comment periods, Ecology receives thousands of pages and/or individual submissions.

The old way of processing comments went back to Ecology's creation in the 1970's. It was a well-intended hodge-podge of solutions that varied in format and sophistication based on the skill set of each team. Further, there were many risks associated with the old method: it lacked sufficient transparency, and came with an unacceptable chance of losing or missing comments. To counter these risks required considerable time. Ecology employees reported spending between 110 and 680 hours per comment period accepting and organizing comments for subsequent review and response.

We set about developing a better approach and identified a number of key challenges:

- The high volume of comments submitted to the agency (both the number of individual submissions and the number of pages associated with a single submission).
- Multiple formats (free form text, Word documents, PDF, spreadsheets, postcards, email, and handwritten).
- Managing records (to meet retention schedules for state requirements and to provide certification of receipt).
- Identifying duplicate comments (this is very challenging to do manually).

- Need for fast turnaround (sometimes Ecology is required to respond within a relatively short timeframe).

Description

The old methodology did not take advantage of technological efficiencies. It included:

- Various manual systems built specifically for each comment period.
- Comments received in a wide variety of formats.
- Editing comments into a consistent format (for example, into Excel spreadsheets or Access databases).
- Time spent identifying duplicate comments.
- Cutting and pasting text into Word documents to create reports and mail lists.
- Challenges for records management.

We set out to find a cost-effective solution for managing all of the agency public comment periods, while also addressing the known challenges. It needed to meet the following criteria:

- Easy to use for both the public and agency employees.
- Provide tools and templates that would work for any agency comment period.
- Ability to store a variety of comment formats.
- Ability to produce detailed reports – summary of comments and identifying the commenter.
- Ability to search, summarize, recognize duplicates, respond, and review comments.
- Assist in managing records so that they can be maintained according to retention management requirements.
- Facilitate responding to public disclosure requests related to comment periods.
- Meet Washington State Office of the Chief Information Officer (OCIO) Policy 188 regarding digit accessibility requirements.

We explored and considered using existing government systems; building our own customized system; outsourcing the public comment process; or purchasing software as a service. After evaluating these options, we selected software as a service (SaaS) and identified a vendor, SmartComment Software, who was able to work with us to address our specific needs. Their system was ready to implement immediately: Ecology signed a contract on February 28, 2017, and our first comment period using the new system began in the Spring of 2017.

Working collaboratively with the vendor, we made modifications in an iterative manner to meet business needs. For example, we made adjustments for digital accessibility, have added several standard reports, and added a feature for importing comments submitted in Excel. The SmartComment vendor provided 24-hour technical support, and minimal agency IT resources were needed. The cost for this system is \$66,000 a year.

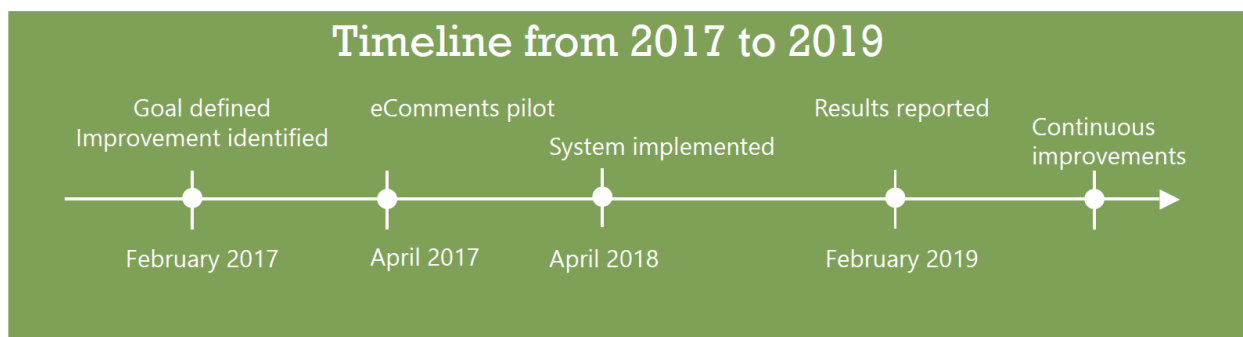
The system provides:

- A friendly and easy-to-use customizable interface.
- A SaaS solution hosted in the cloud (SmartComment), so no infrastructure investment is required.
- A consistent process and tools that help Ecology employees manage and respond to public comments.

- Better comment tracking and reporting capabilities.
- Reduced time needed to setup and operate the comment process.
- Tools and templates for a variety of reports, and methods for viewing comments and responses.
- The ability to store many different comment format types.
- Detailed reports, with several layout options.
- Availability 24-hours a day from any computer, phone, or tablet. Ecology employees can also access the system through a login interface.
- The ability to search, summarize, recognize duplicates, respond and review comments.
- A much easier way to manage records.

Implementation Detail

We call our new system eComments, and are now beginning its third year of operation. We began with a pilot in March 2017 and used it to identify the types of training needed. We launched eComments in the spring of 2017 and it became the agency standard in April 2018.



Governance

A core team provides direction and governance. The core team consists of a business lead, a backup to the business lead, an IT lead, administrators from each of our 12 environmental programs, representatives from Ecology regional offices, and the vendor.

The business lead provides oversight for implementation and:

- Works with the vendor on enhancements to the system, including any special requests, and tracking associated deadlines.
- Organizes and either co-facilitates or leads training sessions (as needed).
- Trains administrators on set-up and adding users.
- Establishes consistent and standard practices around comment periods.
- Implements security access protocols.
- Facilitates quarterly core team meetings.
- Provides updates to executive sponsors.
- Provides updates and information to agency users.
- Provides technical assistance as needed.

The IT lead reviewed the software to ensure it met state IT requirements, provided security design review, and checked overall architectural compatibility. They also worked with contractor to ensure the software met accessibility requirements.

Ongoing, the IT lead:

- Consults and works with vendor on IT system requirements and issues.
- Attends the quarterly eComments meeting.

We have assigned eComment administrators to each of our 12 environmental programs and four regional offices. They:

- Help staff sign-up for training and connect to online training.
- Provide technical assistance.
- Set up comment period projects, help staff use the system, and ensure projects are closed when they are no longer needed in the system.
- Attend the quarterly eComments meeting.
- Support and encourage eComments use within their programs.

We meet regularly with the vendor to check-in on operations and to discuss complex projects.

Ongoing they:

- Monitor the system and respond to issues as they arise.
- Provide immediate training when needed.
- Provide unlimited training to agency staff.
- Meet with us quarterly to set a work-plan for the next six months.

Significance

The Washington State Department of Ecology averages over 400 comment periods each year, asking for public input on environmental air and water permits, proposed or amended regulations, decisions related to projects of statewide significance, plans for cleanup of toxic contamination, and more. We accept comments related to scientific studies or reports related to specific topics or geographic areas.

Ecology values providing considerate and thoughtful review of input from interested, concerned, and regulated individuals, businesses, and groups. We experience fierce and passionate letter writing campaigns that co-exist and overlap with ongoing deliberations about technical and nuanced issues. Our commitment to the people of Washington includes listening carefully and communicating in a responsive and timely manner.

This project aligns with the Washington state goal of providing efficient, effective, and accountable government. It supports Ecology's goal of delivering efficient and effective services. Through eComments we have vastly improved our ability to provide thoughtful consideration to input from the people of Washington.

Impact

Feedback has been overwhelmingly positive, and eComments is now used for all comment periods at Ecology¹. The benefit to the people of Washington has been:

- Greater transparency: it's easy to post comments received so that anyone can read them.
- Consistency: there is now a single way for managing comment period input.
- Efficiency: fewer steps and less manual processing.

Table 1. Amount of comment management time reduced by eComments

Staff activity	Before eComments	With eComments
Build an online comment form	A few days	Less than 1 hour
Review and organize comments	Up to 9 weeks	A week or less
Post comments online	A few days	Less than 1 hour
Produce a contact list	All day	A few minutes
Provide comments for public disclosure requests	All day	Less than 1 hour

The people of Washington now:

- Have a consistent online form for submitting comments.
- Can submit comments on a computer, laptop, tablet, or smart phone.
- Can view comments submitted as soon as they are posted and after the comment period has ended, meeting Washington state OCIO Policy 187 for Open Data.

Ecology now has:

- A consistent process and tools.
- Efficient comment tracking and reporting.
- Efficient ways to collect, review, and respond to comments.
- Detailed, complex reports with comments and summaries in minutes.
- The ability to easily search, summarize, and recognize duplicate comments.
- A dashboard for each project, with highlights about comments received.

Conclusion

Our new electronic comment system has delivered powerful results. We have a reliable system that significantly reduced processing time. We now focus more on the meaningful work of considering, evaluating, and responding to comments, which means we are better able to protect, preserve and enhance the environment for current and future Washingtonians.

¹ There are a few exceptions: for example, when comments are submitted to a partner agency (usually a county).