

2017 Supplemental Budget Request Decision Package

Agency: 082 – Public Disclosure Commission

Decision Package Code/Title: AG - Public Disclosure Commission Legal Services

Budget Period: 2017 Supplemental Budget Request

Budget Level: M2 - Inflation and other Rate Changes

Agency Recommendation Summary:

This request is to fund legal services costs to the Public Disclosure Commission (PDC) for Fiscal Year 2017. During the summer of 2015, the PDC began to realize an increased need for legal services due to an increase in cases with complex legal issues, ballot initiatives and Citizen Action Complaints. At the same time, the PDC’s need for regular, ongoing legal support from the AGO had increased due to prior internal staffing reductions. These demands quickly outpaced the PDC’s legal services budget in the current biennium—as a result, the allocation for legal services costs for the 2015-17 biennium was exhausted within the first 10 months of FY16. The PDC will face significant budget problems if additional funding for legal services is not added to the FY17 budget.

Fiscal Summary:

Operating Expenditures	FY 2016	FY 2017
Fund 001-1	0	\$313,000
Total Cost	0	313,000

Staffing	FY 2016	FY 2017
FTEs	0	0

Revenue	FY 2016	FY 2017
N/A		

Object of Expenditure	FY 2016	FY 2017
Obj. E		313,000

Package Description:

The increased level of funding is necessary for the Attorney General’s Office (AGO) and PDC to perform their statutory responsibilities under RCW 42.17A to enforce the state’s campaign

finance disclosure laws. PDC’s legal work consumed more than its entire 2015-17 biennial allocation in FY2016 resulting in a significant shortfall for the biennium. The PDC’s 2015-17 biennial legal services allocation is \$399,315. This shortfall is expected to continue into the 2017-19 biennium and into future biennia.

The increased costs can be attributed to three main trends.

First, the PDC has engaged, and will likely continue to be engaged, in complex litigation. A major contributor to the 2015-17 shortfall is the Grocery Manufacturer’s Association (GMA) case. The state alleged that GMA had intentionally concealed the identity of donors who contributed more than \$12,000,000 in an initiative campaign in 2013. This case required significant legal resources as the parties completed discovery and brought dispositive motions. Through those motions, the Court concluded that the Defendants violated state law. The issue currently before the Court is the amount of penalties to assess against GMA. The state claims more than \$43,000,000 in penalties due to the severity of the campaign finance violations. The verdict is expected at very soon. Regardless of the eventual ruling, an appeal of this case is likely, and legal costs are assumed to continue to accrue into the 2017-19 Biennium. While the State may eventually recover significant penalties, costs and attorney’s fees and thus recoup the expenses back to the State Treasurer, the timing and amount of that recovery is uncertain.

Second, the PDC anticipates other significant campaign finance litigation regarding initiative funding. The number of initiatives has risen, and the amount of money coming into initiative campaigns is in the millions of dollars each. Currently, for the 2016 general election, the following initiatives will be on the ballot and have raised the following amounts of money:

Initiative	Total Contributions as of 10/21/2016
Raise Up WA; Minimum wage (I-1433)	\$4,209,062
Alliance for Gun Responsibility (I-1491)	\$3,977,810
Integrity WA; Campaign finance (I-1464)	\$3,427,162
Prevent Fraud and Protect Seniors (I-1501)	\$1,456,611
Carbon WA (I-732)	\$1,453,294

Initiatives are well-financed and include significant amounts of out-of-state money in the 2016 campaigns. Initiatives will continue to generate complaints about campaign finance and disclosure. In addition, initiative sponsor Tim Eyman and his Voters Want More Choices group are the subject of several complaints under investigation at the AGO. Due to high monetary value and increased visibility of these cases, defendants are using more aggressive defense tactics and prolonging the actions resulting in increase legal expenses for the state.

Third, the PDC expects continued increased numbers and complexity of Campaign Finance Complaint Lawsuits. As background, the PDC was created by an Initiative of the People to, among other purposes, allow individuals access to information regarding the financing of public campaigns to enable them to make informed voting decisions. To further this goal the law allows individuals to notify the Attorney General and the relevant county prosecutor that there is reason to believe campaign finance laws are being violated. If within 45 days of providing that notice neither the Attorney General nor the prosecutor has filed suit, the individual may bring suit (per RCW 42.17A.765(4)). These “Citizen Action” complaints require the AGO and the PDC to work quickly to assess legal issues and make decisions about campaign finance violations. If a citizen files a lawsuit and is successful, the state can be liable for the citizen’s attorney fees and other expenses. In addition to the possible fiscal impact on the state from the increased numbers of Citizen Action suits, the suits may also result in legal rulings which are not in accord with the state’s interests. For example, advocacy groups have been using the Citizen Action option to influence the campaign issues that the state investigates. Accordingly, the state has filed more campaign finance lawsuits to protect its interest in insuring that the law develops in a manner consistent with the voters’ intent as embodied in the Initiative. This pattern is unlikely to change.

In addition to the increased volume, the complexity of the Citizen Action Complaints cases have also increased. In recent complaints, the allegations of abuse include accounting issues and moving money from one campaign to another—issues that require specialized investigative and forensic skills to assess. Also, the PDC and AGO are experiencing a continuing trend in Constitutional challenges to the state’s limits on campaign contributions and campaign advertising (First Amendment issues). That trend has been observed in other states with similar campaign finance/advertising laws and is expected to continue.

Coinciding with the increased workload trends described above, the PDC has experienced a reduction in their internal legal resources. Prior to 2014, the PDC had an internal General Counsel who prepared materials for the Commission, tracked trends in campaign finance laws, and reviewed potential rule making and legislative proposals. During that time, the Executive Director was also an attorney. After the General Counsel took a position at the AGO, the PDC reviewed the job responsibilities and salary level, and decided that it could not offer a competitive salary for the experience needed for their General Counsel position. Instead, the PDC planned to use the AGO for all legal service needs. Currently, the PDC Executive Director (hired in October 2015) is the only attorney on staff at the PDC. The PDC has increased its use of legal services (advice and litigation) from the Government Compliance and Enforcement Division of the AGO. The current Commission members have also requested additional legal briefing and memos from the attorney assigned to work with them on enforcement matters (the PDC staff and Executive Director are screened from the Commission on enforcement matters). Although relying on the AGO for all legal advice needs has caused the PDC’s legal services costs to increase, it is more cost-effective than hiring a PDC General Counsel. The Assistant Attorney General (AAG) who advises the Commission has over 25 years of experience at the AGO and bills about \$60,000 per year for advice work; a comparably experienced General Counsel would cost the PDC at least \$150,000-180,000 in salary and benefits every year.

Based on the depletion of the PDC's current legal resources in FY 2016 along with an increased need for additional resources, the AGO projects an ongoing need for 1.1 AAG and 0.55 LA in FY 2017 and in each FY thereafter. This request only includes the projected shortfall after accounting for PDCs current legal services allocation (1.1 AAG and 0.55 LA).

Direct Litigation Costs are included in FY 2017 for travel and court costs totaling \$6,000. The PDC will submit a separate decision package for outside counsel costs of \$55,000 in FY 2017 for contracting with a Special Assistant Attorney General to handle litigation in a matter where the Attorney General's Office has a legal conflict and cannot be involved.

A decision package to fund PDC legal services was submitted in the AGO's 2017 Supplemental Budget Request.

This request is supported by the Attorney General, and the PDC understands that this budget request is a priority the Attorney General.

Relationship to the PDC Strategic Plan: The PDC Strategic Plan has several sections regarding how to work effectively with the AGO on enforcement hearings, litigation, and Citizen Action Complaints, and a specific action item to work on the budget for legal services:

Goal II. The PDC will provide effective and impartial enforcement of disclosure laws and will help the regulated community comply

A. The Customer Service and Enforcement Divisions will develop and use processes that enhance compliance and enforcement activities

II.A.4 Continue discussions/meeting with AGO regarding process for citizen action letters

II.A.5 Develop proposals for changing the citizen action process for the 2017 legislative package

Goal III. The PDC will use best practices in order to ensure fair and professional regulation, investigations, and enforcement actions

C. The Enforcement Division will develop and maintain systems to ensure the Commission is prepared for timely and organized hearings

III.C.2 Work with AGO regarding what information should be provided to Commissioners at what time so that they can appropriately prepare for hearings

III.C.3 Review the timing and process of PDC hearings, including use of requests for hearing, pre-hearing conferences for scheduling, and briefing schedules

The PDC contact for this request is Evelyn Fielding Lopez, Executive Director, (360) 664-2735.

Base Budget:

The PDC's current legal services allocation for the 2015-17 biennium is \$399,315, which was depleted in a single fiscal year.

**Decision Package expenditure, FTE and revenue assumptions, calculations and details:
 Fiscal Summary:**

FTE	FY2016	FY2017	Ongoing ? Y / N
AAG		1.1	Yes
LA		0.55	Yes
Management Analyst		0.25	Yes

Costs and FTE are assumed to be ongoing into future biennia. The cost estimates are based on the expectation that future legal needs will continue at elevated levels experienced in the 2015-17 biennium, specifically in FY 2016. Drivers of the increased legal services needs are the continued emergence of complex legal issues, ballot initiatives, Citizen Action Complaints, and ongoing regular legal needs for the PDC which is now more reliant on the AGO than in the past due to prior internal staffing reductions.

Direct litigation costs for travel and court costs is assumed to total \$500 per FM in FY 2017 totaling \$6,000.

Decision Package Justification and Impacts

What specific performance outcomes does the agency expect?

Goal II. The PDC will provide effective and impartial enforcement of disclosure laws and will help the regulated community comply

Goal III. The PDC will use best practices in order to ensure fair and professional regulation, investigations, and enforcement actions

This request will allow the AGO to provide the necessary legal services for PDC to continue its activities regarding campaign finance regulation, including effective enforcement of the laws. The public has authorized a robust and open campaign finance disclosure system, but the PDC cannot fulfill this mandate unless it has funding for the AG legal actions that result from complaints and investigations. Funding this request will also safeguard the state’s resources by allowing the AGO to bring lawsuits which might otherwise be brought by private citizens and result in the state having to pay private legal fees which will likely exceed the expense incurred if the AGO were to handle the lawsuit.

Performance Measure detail:

This does not contribute to a PDC performance Measure.

Relationship to Results Washington:

Funding this request will provide the PDC and the AGO with the resources necessary to enforce the state’s campaign finance laws which supports the Governor’s Results Washington priorities:

1) Goal 5 – Efficient, Effective, and Accountable Government

This request will allow the AGO to provide the necessary legal services for PDC to continue its activities regarding campaign finance regulation that the public expects. It will also safeguard the state’s resources by allowing the AGO to bring lawsuits which might otherwise be brought by private citizens and result in the state having to pay private legal fees which will likely exceed the expense incurred if the AGO were to handle the lawsuit.

Fully describe and quantify expected impacts on state residents and specific populations served.

The citizens of Washington, candidates for elective office, lobbyists, contributors to public elections, the PDC and the AGO will be affected by this request. Without sufficient funding, Washington’s campaign funding laws cannot be enforced, nor can PDC obtain the necessary legal services to address issues regarding filing, disclosure and other aspects of such laws.

What are other important connections or impacts related to this proposal?

Impact(s) To:		Identify / Explanation
Regional/County impacts?	Yes	Counties, schools, and taxing districts are required to follow state laws prohibiting use of public funds and resources for political activity; those laws are enforced by the PDC, and occasionally through lawsuits by the AGO
Other local gov’t impacts?	Yes	Cities and municipal taxing districts are required to follow state laws prohibiting use of public funds and resources for political activity; those laws are enforced by the PDC, and occasionally through lawsuits by the AGO
Tribal gov’t impacts?	No	
Other state agency impacts?	Yes	PDC and Attorney General’s Office
Responds to specific task force, report, mandate or	Yes	The state’s broad Public Disclosure Act requires disclosure of campaign finance

exec order?		information and lobbyist information; those mandates are enforced by the PDC and by legal actions commenced by the AGO
Does request contain a compensation change?	No	
Does request require a change to a collective bargaining agreement?	No	
Facility/workplace needs or impacts?	No	
Capital Budget Impacts?	No	
Is change required to existing statutes, rules or contracts?	No	
Is the request related to or a result of litigation?	Yes	This is related, in part, to extraordinary costs of the Grocery Manufacturers case and other campaign finance litigation.
Is the request related to Puget Sound recovery?	No	
Identify other important connections	NA	

Please provide a detailed discussion of connections/impacts identified above.

This request will impact the PDC and AGO. Without the increased resources requested, the AGO will not be able to provide PDC with legal services for the necessary level of enforcement or advice.

What alternatives were explored by the agency and why was this option chosen?

The alternative to obtaining additional funding for PDC legal services is that the PDC will not be able to obtain legal advice or representation from the AGO. As a result, the PDC will not be able

to enforce the state's campaign finance laws. There are no available resources within the AGO to provide these services.

What are the consequences of not funding this request?

If this request is not adopted, the PDC will not have the necessary resources to pay for legal services. Without these services, the PDC and the AGO will be unable to carry out the core function of enforcing the state's campaign laws. In addition, the lack of legal service funding will result in financial loss to the state as the state will be found liable for attorney fees and costs for private lawsuits which otherwise would be brought by the AGO on behalf of the PDC. Because private attorneys frequently charge more than the costs of the AGO, these lawsuits will result in greater public expenditure than if funding is provided for the AGO to handle the litigation.

How has or can the agency address the issue or need in its current appropriation level?

If this package is not funded, it will require the PDC to divert existing funding to cover legal services, or to cease requesting needed legal assistance. If advice is not provided, it increases the risk of uninformed and potentially costly decisions, and may increase the risk of challenges to PDC actions. Any funds diverted will result in a reduction or delay in the legal representation in the enforcement area. Reduction in legal representation attorney time will result in a delay in responding to enforcement advice, and the scheduling for administrative proceedings before the PDC. This may cause cases to become unenforceable because they will have not been charged within the five year statute of limitations under the law. Additionally, it will cause a lack of public confidence in those working on campaigns who may be violating the law without repercussions.

Other supporting materials:

Attachment 1: PDC Legal Services, 2017 SUPPL DP

Information technology: Does this Decision Package include funding for any IT-related costs, including hardware, software, services (including cloud-based services), contracts or IT staff?

<input checked="" type="checkbox"/> No 
<input type="checkbox"/> Yes Continue to IT Addendum below and follow the directions on the bottom of the addendum to meet requirements for OCIO review.) Note: If the answer is yes, AGO Divisions should contact AGO ISD and AGO Budget. AGO ISD will coordinate with the OCIO as necessary.

Supplemental 17, 15-17 Biennium Budget Decision Package

Agency: 082 – Public Disclosure Commission

Decision Package Code/Title: AA – Outside Counsel/Special AAG Services

Budget Period: Supplemental 17, 2015-17 Biennium (BDS)

Budget Level: PL - Policy/performance level (BDS)

Agency Recommendation Summary Text: The PDC is requesting \$55,000 of funding for outside Legal Counsel. The increased level of funding is necessary to cover the costs of the PDC’s outside counsel usage for a case filed in Thurston County Superior Court. The PDC is the responding party and must be represented by counsel. The Attorney General’s Office is conflicted from taking the case or representing the PDC in this matter.

Fiscal Summary: Decision package total dollar and FTE cost/savings by year, by fund, for 4 years. Additional fiscal details are required below.

Operating Expenditures	FY 2016	FY 2017	FY 2018	FY 2019
Fund 001-1		\$55,000	0	0
Total Cost		\$55,000	0	0
Staffing	FY 2016	FY 2017	FY 2018	FY 2019
FTEs		0.0	0.0	0.0
Revenue	FY 2016	FY 2017	FY 2018	FY 2019
None		0.0	0.0	0.0
Object of Expenditure	FY 2016	FY 2017	FY 2018	FY 2019
Obj. C		\$50,000	0	0
Obj. E		\$5,000	0	0

Package Description

This request is to fund legal services costs to the Public Disclosure Commission (PDC) for Fiscal Year 2017. As background, in February 2016, a trade group, Automotive United Trades Organization (AUTO), asked the Public Disclosure Commission to make a rule establishing that candidates could not accept campaign contributions from Indian Tribes because Tribal funds should be considered the same as public funds. The PDC declined. Two months later, AUTO filed a 45-day Citizen Action Complaint with the Attorney General claiming that the Friends of Bob Ferguson campaign had violated state campaign finance laws by accepting two contributions from Indian Tribes. Because the complaint involved his campaign for re-election, the Attorney General felt that his office had a conflict of interest and no member of the Attorney General’s Office could work on

the matter or assist the PDC. In June 2016, the PDC notified AUTO that it would not be commencing an action on the Citizen Action Complaint.

In August 2016, AUTO filed a petition for judicial review in Thurston County Superior Court asserting various challenges to the PDC's action in declining to take action on its complaint. Because the underlying dispute involved AUTO's complaint about the Friends of Bob Ferguson campaign, the Attorney General's Office was not able to represent the PDC. Instead, the PDC is represented by a Special Assistant Attorney General, Jeff Freimund of Freimund, Jackson & Tardif PLLC. The contract for outside legal counsel anticipates the PDC spending \$50,000 for legal services and \$5,000 for expenses.

The PDC has submitted other decision packages detailing its severe shortage of funds due to a large number of complex cases and other increased legal service needs. AGO billings for the 2015-17 biennium have completely depleted the PDC's budget—the full biennial allotment for legal services was spent during the first 10 months of the biennium. The PDC does not have resources to cover the outside counsel costs that will be billed during FY 2017.

Base Budget: If the proposal is an expansion or alteration of a current program or service, provide information on the resources now devoted to the program or service. Please include annual expenditures and FTEs by fund and activity (or provide working models or backup materials containing this information).

Currently our legal representation is provided by the Attorney General's Office. Unfortunately, because of the background to this case the AGO is not able to represent the PDC in the AUTO litigation. As a result, we had to contract for outside legal counsel, and we will have legal costs in addition to what we normally pay for AGO services.

Decision Package expenditure, FTE and revenue assumptions, calculations and details: Agencies must clearly articulate the workload or policy assumptions used in calculating expenditure and revenue changes proposed.

The funding requested is an estimate of the anticipated case cost for the PDC.

Decision Package Justification and Impacts

What specific performance outcomes does the agency expect?

Describe and quantify the specific performance outcomes the agency expects as a result of this funding change.

Performance Measure detail:

Fully describe and quantify expected impacts on state residents and specific populations served.

What are other important connections or impacts related to this proposal? Please complete the following table and provide detailed explanations or information below:

Impact(s) To:		Identify / Explanation
Regional/County impacts?	No	Identify:
Other local gov't impacts?	No	Identify:
Tribal gov't impacts?	No	Identify:
Other state agency impacts?	No	Identify:
Responds to specific task force, report, mandate or exec order?	No	Identify:
Does request contain a compensation change?	No	Identify:
Does request require a change to a collective bargaining agreement?	No	Identify:
Facility/workplace needs or impacts?	No	Identify:
Capital Budget Impacts?	No	Identify:
Is change required to existing statutes, rules or contracts?	No	Identify:
Is the request related to or a result of litigation?	Yes	Identify lawsuit (please consult with Attorney General's Office): The AGO has a conflict of interest, so outside counsel have been hired to represent/defend PDC in Automotive United Trades Organization v. Washington Public Disclosure Commission, Thurston County Superior Court No. 16-2-03237-34
Is the request related to Puget Sound recovery?	No	If yes, see budget instructions Section 14.4 for additional instructions
Identify other important connections		

Please provide a detailed discussion of connections/impacts identified above.

What alternatives were explored by the agency and why was this option chosen?

The PDC reviewed local attorneys who have provided administrative procedure legal assistance to other state agencies, and determined that the Freimund, Jackson & Tardif firm had relevant experience, were available to take the case, and had reasonable fees. It is a hardship to not be able to use our experienced AGO attorneys, but we had no other options.

What are the consequences of not funding this request?

The PDC will be further hampered by lack of funding for necessary legal services. The PDC has little choice but to defend against this lawsuit; lack of effective defense could result in the other side prevailing and an award of attorney fees and costs against the state.

How has or can the agency address the issue or need in its current appropriation level?

The PDC is already facing high AG costs for other ongoing cases. The agency could only address these increased costs by not processing AG bills and other central service bills pushing those costs onto other state agencies.

Other supporting materials: Please attach or reference any other supporting materials or information that will help analysts and policymakers understand and prioritize your request.

Information technology: Does this Decision Package include funding for any IT-related costs, including hardware, software, services (including cloud-based services), contracts or IT staff?

- No 
- Yes Continue to IT Addendum below and follow the directions on the bottom of the addendum to meet requirements for OCIO review.)

2015-17 Supplemental 17 Biennium Budget Decision Package

Agency: 082 – Public Disclosure Commission

Decision Package Code/Title: AN – IT Investment FTE

Budget Period: Supplemental 17, 2015-17 Biennium (BDS)

Budget Level: PL - Policy/performance level (BDS)

Agency Recommendation Summary Text: The Public Disclosure Commission (PDC) is requesting one FTE for the IT position that was hired with the ongoing IT investment funding PDC received during the 15-17 biennium.

Fiscal Summary: Decision package total dollar and FTE cost/savings by year, by fund, for 4 years. Additional fiscal details are required below.

Operating Expenditures	FY 2016	FY 2017	FY 2018	FY 2019
None	0	0	0	0
Total Cost	0	0	0	0
Staffing	FY 2016	FY 2017	FY 2018	FY 2019
FTEs	0.0	1.0	1.0	1.0
Revenue	FY 2016	FY 2017	FY 2018	FY 2019
None	0	0	0	0
Object of Expenditure	FY 2016	FY 2017	FY 2018	FY 2019
None	0	0	0	0

Package Description

During the 15-17 biennium the PDC received IT investment funding from the legislature. This funding led to hiring an Information Technology Specialist 5 position within the agency. This position is currently using the vacant FTE of the Communication Consultant 2. The agency plans to fill the Communication Consultant 2 position in the future and the agency requires one more FTE as to not overspend the FTE authority of the agency.

Please contact Chad Johnson, 360-407-8130, chad.johnson@des.wa.gov for additional information regarding this request.

Base Budget: If the proposal is an expansion or alteration of a current program or service, provide information on the resources now devoted to the program or service. Please include annual expenditures and FTEs by fund and activity (or provide working models or backup materials containing this information).

This is not an expansion or alteration of a current program.

Decision Package expenditure, FTE and revenue assumptions, calculations and details: Agencies must clearly articulate the workload or policy assumptions used in calculating expenditure and revenue changes proposed.

The agency is already has the funding for the position and is requesting the FTE only for one position.

Decision Package Justification and Impacts

What specific performance outcomes does the agency expect?

Describe and quantify the specific performance outcomes the agency expects as a result of this funding change.

By using this FTE the ITS 5 will be planned in the allotments. Currently positions are being held vacant to account for this position.

Performance Measure detail:

This will not contribute to one performance measure.

Fully describe and quantify expected impacts on state residents and specific populations served.

There will be impacts to requests and stakeholders from delayed responses from the Communication Consultant 2 position because of the vacancy that is being held. When the additional FTE is granted the agency can then hire for the Communication Consultant 2 position which should increase response time from the agency for public inquiries.

What are other important connections or impacts related to this proposal? Please complete the following table and provide detailed explanations or information below:

Impact(s) To:		Identify / Explanation
Regional/County impacts?	No	Identify:
Other local gov't impacts?	No	Identify:
Tribal gov't impacts?	No	Identify:
Other state agency impacts?	No	Identify:
Responds to specific task force, report, mandate or exec order?	No	Identify:
Does request contain a compensation change?	No	Identify:
Does request require a change to a collective bargaining agreement?	No	Identify:
Facility/workplace needs or impacts?	No	Identify:
Capital Budget Impacts?	No	Identify:
Is change required to existing statutes, rules or contracts?	No	Identify:
Is the request related to or a result of litigation?	No	Identify lawsuit (please consult with Attorney General's Office):
Is the request related to Puget Sound recovery?	No	If yes, see budget instructions Section 14.4 for additional instructions
Identify other important connections		

Please provide a detailed discussion of connections/impacts identified above.

What alternatives were explored by the agency and why was this option chosen?

The agency has kept positions vacant to accommodate the additional IT FTE which has created a backlog of responses to agency inquiries. This is not a viable option. Since the funding is already within the PDC the agency determined that requesting the FTE to accommodate the newly funded position.

What are the consequences of not funding this request?

The consequence of not funding this request is that the PDC may expend more FTEs than allocated to the agency.

How has or can the agency address the issue or need in its current appropriation level?

The agency cannot address the issue within its current appropriation. The appropriation does not include the FTE for the ITS 5 position and would create a disparity between the allotments and actual expended FTEs.

Other supporting materials: Please attach or reference any other supporting materials or information that will help analysts and policymakers understand and prioritize your request.

Information technology: Does this Decision Package include funding for any IT-related costs, including hardware, software, services (including cloud-based services), contracts or IT staff?

No 

Yes Continue to IT Addendum below and follow the directions on the bottom of the addendum to meet requirements for OCIO review.)