



**Superior Court of the State of Washington
for the County of King**

Susan J. Craighead
Presiding Judge

King County Courthouse
516 Third Avenue, C-203
Seattle, Washington 98104-2381

January 21, 2015

Chief Justice Barbara Madsen
Washington State Supreme Court
PO Box 40929
Olympia, WA 98504-0929

Re: Proposed Changes to JISCR 13

Dear Justice Madsen:

Thank you for the opportunity to comment on the proposed changes to JISCR 13.

King County Superior Court and Clerk are very supportive of the continuation of a statewide repository of court case information, and data standards that are underlying the repository. However, this rule change, which is purported to protect that repository, is premature, not well developed and will defeat the underlying intent of the proposed rule.

Instead we ask that time, attention and resources are spent establishing electronic data exchange technology between non JIS courts and the statewide repository. Once that technology is in place, rule updates should be considered. Adoption of this rule as-is, absent electronic data exchange, would require duplicate data entry for all the courts not using JIS systems. The cost to the tax payers to support this notion is truly overwhelming. In King County Superior Court alone, the cost could be as much as \$1.8 million per year. No elected official, given the current economy, would support this notion.

The wording of these proposed edits is very problematic. For example, in paragraph 2, the language is unclear and contradictory. A court leaving the JIS does not have an alternative electronic court record system to approve twelve months prior to the purchase or acquisition of software or services. No court will have a vendor willing to hold open a bid for 12-18 months awaiting approval by the JIS committee before installing their product in a court. If the intent is for the JIS committee to give guidance and input on the to-be purchased system, then the wording does not support this and would need to be changed. If the underlying intent is to allow JIS to veto the decision of the court or clerk to use an alternative system, we would strongly disagree that the JIS has authority to do so.

This rule should not be passed. Instead we ask you to direct your attention to the real issue at hand: the JIS development of the technology that would allow data exchange to facilitate the

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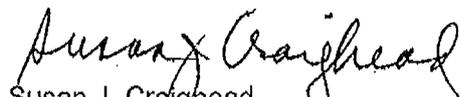
continuing existence of a statewide case history repository. We fully understand that AOC is working on data exchange now, but only that exchange necessary to facilitate the new SC-CMS integration to the existing JIS database. This letter addresses the fact that JIS is NOT WORKING on the data exchange necessary to support incoming data from non-JIS courts, which is more than 40% of the caseload data statewide. It is not being worked on even though Justice Fairhurst said in a December 2011 letter to Pierce County Judge Briyn Chushcoff, "..... *That is the reason why the Data Exchange effort is so critically important and continues to be the JISC's highest priority initiative. Regardless of what systems a court uses, all courts need to be able to exchange their data.*" We agree with this sentiment and ask that this statement by the Justice be supported with the action steps necessary to accomplish it.

Despite all the issues with the rule that we have described, I want to reiterate how strongly we feel about sharing data with the rest of the state and maintaining the incredible asset this state has in the JIS statewide court database. Our main issue is with the unacceptable notion of duplicate data entry. Another way to address our concern would be to add a new section to the proposed rule with language such as:

(d) This rule is to become effective only when JIS has implemented technology that successfully allows for data from non-JIS courts to be electronically exchanged with JIS systems.

Thank you for considering our comments. I urge you to recognize the problems that this proposed rule change will create for the courts representing over 40% of the statewide caseload.

Sincerely,


Susan J. Craighead
Presiding Judge

cc: Fred Jarrett, Deputy County Executive
Paul L. Sherfey, Chief Administrative Officer
Barbara Miner, King County Clerk

Tracy, Mary

From: OFFICE RECEPTIONIST, CLERK
Sent: Thursday, January 22, 2015 11:41 AM
To: Tracy, Mary
Subject: FW: Proposed Changes to JISCR 13
Attachments: Proposed Changes to JISCR 13.pdf

For you ☺

From: Nguyen, Linda [mailto:Linda.Nguyen@kingcounty.gov]
Sent: Thursday, January 22, 2015 11:40 AM
To: OFFICE RECEPTIONIST, CLERK
Subject: Proposed Changes to JISCR 13

Hello,

Attached are the comments for JISCR13.

Thank you,
Linda

Linda Nguyen
Confidential Secretary to Barbara Miner, Director
Department of Judicial Administration | King County Superior Court Clerk's Office
516 Third Avenue, Room E-609 | Seattle, WA 98104-2336
☎ 206.477.0780 | 206.477.0800 | ✉ linda.nguyen@kingcounty.gov