



## LEWIS AND CLARK COUNTY POLICY

<b>Subject:</b> Communications Policy	<b>Policy No:</b> 1.1.1
<b>Approved:</b>	<b>Effective Date:</b> 5/7/19 <b>Revised Date:</b>

### I. POLICY STATEMENT

Lewis and Clark County (the County) recognizes that consistent, thorough and accurate dissemination of information is in the best interest of the County and its residents. The most effective and efficient methods to communicate its work and engage the public is to proactively disseminate accurate information via traditional news media, social media, the web, and other appropriate methods. This policy establishes guidelines and procedures to coordinate County-wide communications to ensure accurate, thorough, and timely messaging is provided to the public.

### II. APPLICABILITY

**Scope:** This policy applies to all County departments and employees under the authority of the Board of County Commissioners (BoCC). It is applicable to all other County employees, except where elected official offices and departments not under authority of the BoCC have communications policies and procedures in place. Any provisions not covered by those policies and procedures are covered by this policy.

This policy applies to all Lewis and Clark County employees while they are at work and are therefore representatives of their employer. Employees should familiarize themselves with the State Code of Ethics ([https://leg.mt.gov/bills/mca/title\\_0020/chapter\\_0020/part\\_0010/sections\\_index.html](https://leg.mt.gov/bills/mca/title_0020/chapter_0020/part_0010/sections_index.html)) to ensure their rights and responsibilities are clear. This policy does not affect an employee's right to speak as an individual citizen outside their employment or professional capacity with the County.

**Authority:** This document represents the County's Communication and Community Outreach program direction and policies. The Communication and Community Outreach Coordinator or Chief Administrative Officer, on a case-by-case basis, may grant exemptions to individual sections or subsections. This document does not supersede state or federal laws.

**Administration:** Department heads under the authority of the BoCC are responsible for policy implementation within their departments and employee compliance with this policy. For elected official offices and departments not under the authority of the BoCC application of these

guidelines is discretionary, dependent on having their own communications policies and procedures in place. Departments and offices not under the authority of the BoCC are encouraged to coordinate communications with the County Communications and Community Outreach Coordinator where applicable and appropriate to ensure coordinated communications. Lewis and Clark Public Health has its own communications policy and personnel due to the requirements of its accrediting body, the Public Health Accreditation Board. Lewis and Clark Public Health is encouraged to coordinate its communications with the County Communications and Community Outreach Coordinator under mutually agreeable operating terms set forth in the attached Standard Operating Procedures.

### **III. DEFINITIONS**

**Media:** A term that refers to all individuals and organizations who maintain print, broadcast or digital communication vehicles for public consumption. This definition includes newspapers, magazines, television, blogs, digital news sites, and other vehicles. If an outlet is unknown or unfamiliar to a County department or employee, the Communications and Community Outreach Coordinator will assist to determine the credibility and validity of the media outlet.

**Routine Media Request:** A request for information about the County that is readily available and non-controversial. Examples include general information about public events, meetings, public projects, or County programs or services.

**Non-Routine Media Request:** A request that requires some preparation before a response. Examples include interpretations of policy, a request for employment records for a County employee, a public records request that may involve litigation, an inquiry about a high profile project or event, or a response to a public emergency or disaster.

**Social Media** An umbrella term that encompasses the various activities that integrate technology, social interaction, and content creation. Social media includes, but is not limited to blogs, wikis, photo and video sharing, podcasts, and other social networking sites.

### **IV. DIRECTIVES**

#### **1. Communications with Media**

##### **Media Inquiries**

The role of the media is primarily to inform audiences of unbiased news as quickly, accurately and comprehensibly as possible. Reporters are looking for the full story, which includes a variety of perspectives on a particular topic and/or issue. As such, it is likely a reporter or news outlet will contact multiple departments and/or elected officials. To ensure a consistent and accurate message, coordination of all countywide communications is important.

In general, the media should be encouraged to contact the Communications and Community Outreach Coordinator, who will work with the appropriate subject matter experts to develop a response. However, often reporters will contact County employees directly. Every media inquiry is an opportunity for the County staff to talk about what they do and why they do it, but preparation and coordination is key.

Responses to reporter inquiries should be issued as quickly as possible and every effort made to meet media deadlines. If a reporter calls and staff speaks to them, unless it is a routine media request and pre-approval has been given, staff should ask who they are, what media outlet they represent, what information they seek and their deadline. Inform them someone will get back to them as soon as possible. If the request is received by voicemail or email, acknowledgement should be made via a courtesy call or email response and the same information requested as stated above. Once this is done, the County employee receiving the request should coordinate with their supervisor, the department head and the Communications and Community Outreach Coordinator.

The Communications and Community Outreach Coordinator should be notified about routine and non-routine media inquiries following the request. Non-routine media requests should be discussed prior to response to ensure an enterprise-wide response is provided. By briefing the Communications and Community Outreach Coordinator, media interactions across departments is better facilitated.

Inform the Communications and Community Outreach Coordinator each time there is a media inquiry because even seemingly routine media requests can contribute to a larger story that may become controversial.

Taking the time to prepare for an in-depth interview can be difficult, especially on short notice. However, the more time given to a reporter to answer their questions increases the likelihood the story will be accurate and in appropriate context. The Communications and Community Outreach Coordinator can sit in on any interview to provide support and feedback.

### **Spokespersons**

In most cases, there will be one spokesperson designated to respond to each media inquiry. A County Commissioner or the Chief Administrative Officer will likely be the spokesperson for County-wide issues and a department director or other management for department level issues. Occasionally the Communications and Community Outreach Coordinator may serve as spokesperson.

Exceptions regarding departmental spokespersons are at the discretion of the department head and Communications and Community Outreach Coordinator.

### **Sensitive or Controversial Issues**

Notify the Communications and Community Outreach Coordinator immediately when a sensitive or controversial issue is identified or an emergency occurs so a response can be prepared as soon as possible. County staff should not wait until there is media interest before contacting the Communications and Community Outreach Coordinator. In an emergent situation (i.e. fire, flood, earthquake, etc.), the Chief Administrative Officer and Disaster and Emergency Services Coordinator will communicate with the Communications and Community Outreach Coordinator and other appropriate elected officials and/or staff.

Sensitive or controversial issues may include but are not limited to:

- Existing or potential threats to public safety, welfare or property;
- A personnel issue regarding any County employee, such as performance evaluation, reasons for termination, reasons for not hiring, or harassment claims;
- Legal claims or lawsuits filed against Lewis and Clark County or any of its employees or agents;
- Issues that may affect the County's public image or citizen confidence;
- Any issue that has the potential to be of interest to the media or public.

### **Legal Issues**

Inquiries regarding pending litigation, exposure to litigation or settled litigation should be referred to the County Attorney's office, Chief Administrative Officer and the Communications and Community Outreach Coordinator. Typically, the County Attorney's office will issue a response.

### **Personnel Issues**

Inquiries regarding personnel-related information should be referred to the Human Resources Department. The Communications and Community Outreach Coordinator will coordinate a response with the Chief Administrative Officer and the Human Resources Director.

### **Public Safety Issues**

During a major emergency (i.e., severe weather, wildfire, etc.), the procedure for handling the media is contained in Lewis and Clark County's Emergency Operations Plan (ESF-15). The plan designates the Incident Command System Public Information Officer as the main point of contact for the media. Depending on the nature of the emergency, the Public Information Officer could be the County Communications and Community Outreach Coordinator or another representative of Lewis and Clark County. The County and/or various County departments may choose to appoint a representative to a Joint Information System, if activated. Communications should be closely coordinated across Lewis and Clark County departments and offices through the Incident Command System to ensure accurate and timely information is disseminated to the public.

Because the Sheriff's office operates on a 24/7 schedule and their work generates a high volume of media calls, it has designated personnel as media spokespersons for routine public safety issues and follows specific guidelines when releasing information. If requested, the Communications and Community Outreach Coordinator may assist in higher profile issues or emergencies.

### **Public Health Issues**

Inquiries regarding public health should be referred to the Lewis and Clark Public Health Communications Manager. Typically, Lewis and Clark Public Health will issue a response, but will coordinate with the Communication and Community Outreach Coordinator.

### **Financial or Tax Issues**

Inquiries regarding Lewis and Clark County finance or tax should be referred to the Chief Financial Officer and/or the Clerk & Recorder/Treasurer. The Communications and Community Outreach Coordinator will coordinate a response with the Chief Administrative Officer and Chief Financial Officer and/or Clerk & Recorder/Treasurer.

### **Digital and Social Media**

Content generated from unknown bloggers, other editors of social media sites, or digital news sites should be directed to the Communications and Community Outreach Coordinator who will evaluate the media outlet and determine an appropriate response.

### **Errors in Reporting**

Bring errors in reporting to the attention of the Communications and Community Outreach Coordinator who will coordinate a correction with the designated media outlet, if appropriate.

### **County-Initiated Communication**

The Communications and Community Outreach Coordinator is responsible for proactively contacting the media. This includes issuing news releases and media advisories and personal contacts with reporters, editors, and bloggers. Departments seeking publicity for events or activities should consult with the Communications and Community Outreach Coordinator at least two weeks in advance of the date of desired media coverage to determine a path forward. Departments should coordinate with the Communications and Community Outreach Coordinator to ensure County-wide coordination where appropriate.

Occasionally, the County may hold news briefings or news conferences to provide media with in-depth information about an issue or to announce or respond to an issue of significance. The Communications and Community Outreach Coordinator can schedule and support such media events if desired.

## **2. Website**

### **County Website**

In addition to this policy, Lewis and Clark County Information Technology Policies, VII. Internet Policies and Procedures, I. Web Page Content, provides IT&S Guidelines and Policy that should be read and adhered to, as well as Lewis and Clark County Website Policies and Procedures:

[https://intranet.lccountymt.gov/fileadmin/user\\_upload/ITS/Web\\_Info/County/SKM\\_C454e16052415290.pdf](https://intranet.lccountymt.gov/fileadmin/user_upload/ITS/Web_Info/County/SKM_C454e16052415290.pdf).

The County's website provides an important online portal for government services, as well as a communications and awareness building tool for its activities. This platform encourages a forum for dialogue and can be utilized to enhance public participation.

Departments should not develop separate sites with separate web addresses (URLs) without consulting the Information Technology Department and the Communications and Community Outreach Coordinator.

Content posted to the site should provide simple access to as many County services as possible. Content can highlight County accomplishments, educate the community about how government works, encourage public participation in local government, and inform the public about emergencies. County departments should utilize the website to communicate about specific topics of interest to the segments of the community they serve. Website content should meet the County's goals for information dissemination and observe state and federal law, including copyright laws.

### **Coordination**

The Communications and Community Outreach Coordinator should assist with coordination and consistency across the County website, provide and assist with new content ideas, assist web publishers with content where applicable and suggest visual and grammatical improvements. The Communications and Community Outreach Coordinator may post, edit and/or remove content as necessary, working with web editors when possible and appropriate.

## **3. Social and Digital Media**

### **Social and Digital Media Generally**

In addition to this policy, Lewis and Clark County Information Technology Policies, VII Internet Policies and Procedures, H. Social Media, provides IT&S Guidelines and Policy that should be read and adhered to.

Information posted to a social media site can add to the public's understanding of a department or a specific project. Lewis and Clark County communications, through social media sites and other digital applications, carry the same weight as the County's official website and content must be maintained with the same level of accuracy, integrity and timeliness.

Lewis and Clark County's social media use will vary depending on the County's goals and a department's business needs. Emerging online collaboration platforms are fundamentally changing the way county government engages citizens and community partners. It is important for Lewis and Clark County to be aware of and participate in this network of information, interaction, and idea exchange where possible.

The most appropriate uses of social media tools fall into two general categories:

- As channels for disseminating time-sensitive information as quickly as possible (example: emergency information).
- As marketing or promotional channels, which increase the County's ability to broadcast its messages to the widest possible audience.

Inappropriate use of County social media includes, but is not limited to, personal communications; profane language or content; content that promotes or fosters discrimination prohibited under federal and state law; sexual content or links thereto; content regarding private business activities or political purposes.

Employees must abide by copyright laws, ethics rules and other applicable laws.

## **Page Creation**

Multiple social media pages currently exist within Lewis and Clark County government. Each department should provide the Communications and Community Outreach Coordinator with the name and contact information of the department employee responsible for the department's social media pages.

Before developing new pages, Department heads should consult with and obtain approval from the Communications and Community Outreach Coordinator. The following should be submitted:

- Proposed Social media platform
- Name of page and purpose
- Administrator
- Proposed type of content and frequency of posting
- Level of interaction with the public (i.e. responding to comments, comments turned off, etc.)

Pages and related content must represent the County, not any individual.

Additionally, IT&S must be contacted prior to use of a new social media account or page to coordinate archival and records retention of social media content.

## **Page Maintenance**

Identified page administrators will have authority of the page. Content should be updated regularly and the page reviewed frequently. If public comment is allowed and a response is necessary, this should be done within several business days of original comment. However, due to the nature of comments on social media, not all comments require a response and the page administrators and appropriate department personnel have the discretion to determine whether one is necessary and appropriate.

When appropriate, individual department social media accounts should coordinate posts with the main Lewis and Clark County social media pages and vice versa.

Where possible, content posted to Lewis and Clark County's social media sites should contain links directing users back to the County's official website or other official sources for in-depth information, forms, documents or online services necessary to conduct business with the County.

The Communications and Community Outreach Coordinator may recommend termination of any page to the department head and/or Chief Administrative Officer if content is infrequently updated, inappropriate, not applicable to the County or serving little to no purpose.

## **User Interaction and Comments Policy**

Lewis and Clark County-created social media posts inviting comments must be structured to focus discussions on services of the County. Any section of a social media site that allows comments should include the following advisory, displayed to users or made available by hyperlink:

*“The purpose of this page is to present matters of public interest relating to Lewis and Clark County to its many residents, businesses and visitors. We encourage you to submit your questions, comments and concerns, but please note this is a moderated online discussion site. Any comments not of public interest or deemed inappropriate will be promptly removed.”*

Departments shall monitor public comments and take prompt corrective action when an issue arises that challenges the accuracy of County information or questions County operations or services.

Page administrators may promptly remove comments as outlined below:

- Vulgar language;
- Personal attacks of any kind;
- Threats to Lewis and Clark County elected officials, County employees, other government employees or elected officials, or to the public;
- Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, political beliefs, gender, gender identity, gender expression, sexual orientation, marital status, status with regard to public assistance, national origin, physical or mental disability;
- Spam or links to other sites;
- Sexual content or links to sexual content;
- Conduct or encouragement of illegal activity;
- Off topic content (unless the commenter can be appropriately redirected);
- Comments in support of or opposition to political campaigns or ballot measures, or promotional content for political organizations;
- Solicitations of commerce, commercial products or services;
- Copyright or trademark infringement;
- Information that may compromise the safety or security of the public or public systems.

These guidelines must be displayed to users or made available by hyperlink.

Comments that meet any of these criteria should be captured for departmental records and deleted. A screen-shot should be taken of the original County post and the comment to be deleted. Documentation should be maintained to explain why the content was deemed unacceptable and removed, as outlined in records management guidelines. Additionally, all social media posts and content are archived.

### **Mistakes**

County generated information containing misinformation or factual errors should be corrected as soon as the mistakes are identified, and remedial action should be taken as appropriate to the situation. It is recommended that information is not deleted, but rather reposted correctly, noting the correction. Even if a post is deleted from a social media platform, it has not truly been erased. The content is still hosted on that server and is often available to the public.

### **Public Records**



Public records include those in electronic form according to Montana law (2-6-1002, MCA). Communications to or from County personnel through social media is likely presumed a public record. If a communication is a public record, then the Secretary of State's General Records Retention Schedules provide guidance regarding how long certain types of city/county government records must be kept.

A public record is subject to disclosure upon citizen request. See §2-6-1003, MCA. Since citizens using city/county government social media sites may be unaware of public record laws, a department using social media should post a statement or a hyperlink to a statement on the social networking site indicating that communications on the site are presumed to be public records subject to disclosure to third parties.

Employees should be aware that work-related texts and voice messages on cell phones are public records subject to the Public Records Act. Employees have a duty to maintain such records in accordance with the Montana Local Government Record Retention Schedules:

<https://sosmt.gov/records/local/>.

#### **4. Employees Acting as Private Citizens Guidelines**

##### **Acting as a Private Citizen**

Any contact with the media outside of an employee's capacity as a Lewis and Clark County representative should not include reference to employee's position with the County. Contact with reporters outside of County professional capacity must not be made on County time using County resources.

##### **Employee Private Social Media Participation**

As a Lewis and Clark County employee, your voice on personal social media can be confusing to some participants. The following suggestions may reduce confusion about whether you are using social media personally or in the course of your employment with Lewis and Clark County:

- If you list Lewis and Clark County as your place of employment, include a disclaimer that anything you post is your personal opinion and not necessarily the opinion of Lewis and Clark County. For instance, you could say, "Opinions and posts are my own" in the Intro section of your Facebook page. On Twitter, you can add that to your profile. Most social media accounts have something similar.
- Do not use your County email address to comment on social media or other public forums.
- Do not post any work-related confidential information.
- Be considerate of your colleagues by getting their permission before writing about, posting photographs or displaying Lewis and Clark County information that might be considered a breach of privacy.
- Recognize that you may be legally liable for anything you write or present online.
- Use good judgement before you "friend" or "follow" persons or entities where your employment status could be misconstrued as support.

## **V. CLOSING**

Questions concerning this policy should be directed to the Communications and Community Outreach Coordinator.

## **VI. REFERENCES**

- A. Montana Code Annotated (MCA) 2017 Title 2, Chapter 2, Part 1 State Code of Ethics  
[https://leg.mt.gov/bills/mca/title\\_0020/chapter\\_0020/part\\_0010/sections\\_index.html](https://leg.mt.gov/bills/mca/title_0020/chapter_0020/part_0010/sections_index.html)
- B. Lewis and Clark County's Emergency Operations Plan (ESF-15)
- C. Lewis and Clark County Information Technology Policies, VII Internet Policies and Procedures, H. Social Media
- D. Montana Code Annotated (MCA) 2017, Title 2, Chapter 6, Part 10, 1002 Definitions
- E. Montana Code Annotated (MCA) 2017 Title 2, Chapter 6, Part 10, 1003 Access to Public Information – Safety and Security Exceptions – Montana Historical Society Exception
- F. Montana Secretary of State Local Record Forms and Retention Schedules  
<https://sosmt.gov/records/local/>

## **VII. ATTACHMENTS**

- A. Standard Operating Procedures between Lewis and Clark County AND Lewis and Clark Public Health.

**STANDARD OPERATING PROCEDURES BETWEEN  
Lewis and Clark County AND Lewis and Clark Public Health**

*These Standard Operating Procedures accompany the Lewis and Clark County Communications Policy and describe in further detail the relationship between Lewis and Clark County Communications and Outreach Coordinator and Lewis and Clark Public Health Communications Manager.*

1. News releases will be shared between County Communications and Outreach Coordinator and Lewis and Clark Public Health Communications Manager a day in advance of distribution to the media outlets for standard releases and an hour in advance when possible of distribution to the media outlets for quick response releases. This will allow identification of either county or public health perspectives to be included before submission.
2. Lewis and Clark Public Health Communications Manager will inform Lewis and Clark County Communications and Outreach Coordinator of news related interviews in advance of the story releasing publicly.
3. Lewis and Clark County Communications and Outreach Coordinator will contact Lewis and Clark Communications Manager first via email, office phone, and/or cell phone in the event that a media outlet is requesting comment from public health. If Lewis and Clark Communications Manager is not available, the Health Officer will be contacted next. If neither LCPH Communications Manager nor the Health Officer are available, contact any of the three Division Administrators.
4. Lewis and Clark Public Health Communications Manager will provide Lewis and Clark County Communications and Outreach Coordinator with a monthly media report outlining media and social media contacts throughout the month.
5. Lewis and Clark County Communications and Outreach Coordinator will communicate with the Chief Administrative Officer and/or the County Commission on public health media relations, as he/she deems appropriate.
6. Lewis and Clark Public Health Communications Manager is responsible for maintaining the Lewis and Clark Public Health website and Facebook page.
7. Lewis and Clark Public Health Communications Manager will courtesy copy the monthly Independent Record Column to the Lewis and Clark County Communications and Outreach Coordinator.
8. In cases of public health specific emergencies, Lewis and Clark Public Health will take the lead and share messaging with Lewis and Clark County Communications and Outreach

Coordinator. For all other emergencies, Lewis and Clark Public Health will participate in a Joint Information Center to coordinate and develop consistent messaging.