

AGENDA NOTE – HRPDC EXECUTIVE COMMITTEE MEETING

ITEM #4: HRPDC EXTERNAL COMMUNICATIONS POLICY

SUBJECT:

Proposed policy for external communications for the HRPDC staff.

BACKGROUND:

The HRPDC staff has had a series of limited and informal policies on communications with the media, including internet usage, blogging and other types of social media. The Freedom of Information Act (FOIA) requirements were compiled in a separate document and in an effort to create a comprehensive document on all types of external communications, the attached policy was drafted to consolidate various written and unwritten policies. The new policy also expands on the personal use of media during and outside of working hours.

The proposed policy has been extensively reviewed internally and by Ms. Susan Blackman of Willcox and Savage PC. This policy is designed to serve as a stand-alone document for communications policies and as an attachment for the Personnel Manual.

Mr. Randy Keaton, HRPDC Deputy Executive Director will provide a brief overview to the Commission.

Attachment 4

Note: This item will be presented for action under Agenda Item #10-G.

HRPDC/HRTPO

External Communications Policy

September/2013

Policy outlining the guidelines for the use of HRPDC/HRTPO personnel in communicating with media outlets and with social networking.

TABLE OF CONTENTS

PURPOSE 2

- 1. Definition of “Media” 2
- 2. Definition of “Social Media” 2

COMMUNICATING WITH MEDIA OUTLETS 3

- 1. Definition of “Routine Media Request” 3
- 2. Definition of “Non-Routine Media Request” 3
- 3. HRPDC/HRTPO SPOKESPERSONS 4
- 4. HRPDC/HRTPO-Initiated Communications 4

SOCIAL MEDIA 4

- 1. HRPDC/HRTPO Websites 4
- 2. Social Networking 5

RECORDS MANAGEMENT AND PRESERVATION 6

FREEDOM OF INFORMATION ACT 7

- 1. FOIA Rights 7
- 2. Making a Request from HRPDC/HRTPO 7
- 3. HRPDC/HRTPO’s Responsibilities in Responding to Requests 8
- 4. Costs 9

PERSONAL USE OF MEDIA DURING WORKING HOURS 9

PERSONAL USE OF MEDIA OUTSIDE OF WORKING HOURS 10

SECURITY GUIDELINES 11

POLICY VIOLATIONS 11

PURPOSE

The Hampton Roads Planning District Commission and Hampton Roads Transportation Planning Organization (HRPDC/HRTPO) seek to inform their localities, agencies, and residents by engaging in pro-active and interactive communications. HRPDC/HRTPO's External Communications Policy recognizes that the most effective and quickest methods to communicate agency policies and activities to the public is by working in partnership with the traditional news media, while also directly communicating with constituents through digital media platforms, such as the website and third party social media applications. HRPDC/HRTPO have an overriding interest and expectation in deciding what is "spoken" on their behalf to the media/general public and on social media sites, therefore, it is important that all agency communication tools be used in ways that provide clear communication, maximize transparency, maintain the security of the network, and are appropriately professional.

This policy establishes guidelines for the establishment and use by the agencies and their employees of communicating with media outlets/general public and for the use of social media sites as a means of conveying significant information to their localities.

1. The term "**media**" refers to all individuals and organizations who maintain print, broadcast, or digital communication vehicles for public consumption. This definition includes:
 - Newspapers
 - Magazines
 - Television
 - Digital news sites
 - Websites
 - Enewsletters
 - other vehicles

2. The term "**social media**" is understood to be content created by individuals, using accessible, expandable, and upgradeable publishing technologies, through and on the Internet. Examples of social media include:
 - Facebook
 - Blogs
 - MySpace
 - RSS
 - YouTube
 - Twitter
 - LinkedIn
 - Flickr
 - Pinterest
 - Other social networking sites

COMMUNICATING WITH MEDIA OUTLETS AND GENERAL PUBLIC

Routine Media/Public Request

A routine request for information from HRPDC/HRTPO is one that seeks basic facts. Calls or visits from the media/public should always be referred immediately to the appropriate Deputy Executive Director or appropriate Principal if the Deputy Executive Director is not available. The Deputy Executive Director or Principal will determine if the information requested is routine or non-routine and necessitates collaboration with the Executive Director. The Deputy Executive Director or Principal will notify the Executive Director of any media request even if it is a routine request. All staff may communicate basic and routine information that is readily available to the public and is in relation to their specific responsibilities.

Examples include:

- seeking general information about HRPDC/HRTPO programs or projects;
- seeking general information about services offered;
- or other requests seeking information that is readily available and non-controversial.

Non-routine Media/Public Request

A non-routine request may be of a sensitive or controversial nature and include responses that require the interpretation of policy, employee records, and public record requests for detailed records, legal action, or emergency situations. These types of issues often become headlines in the media and have the ability to become viral online. This provision provides the framework for the HRPDC/HRTPO's Executive Director to respond appropriately and as soon as possible to these issues. HRPDC/HRTPO staff shall notify the Executive Director or Deputy Executive Director if the Executive Director is not available immediately when a sensitive or controversial issue pertaining to operations of a department is identified, or when an emergency situation occurs (i.e. those that will have an impact on a large number of residents could potentially generate great media interest and those that involve high-profile individuals or departments). HRPDC/HRTPO staff should not wait until there is media interest before contacting the Executive Director. Immediate notification is critical in order for the Executive Director to prepare for, and to respond to, media inquiries.

Sensitive or Controversial Issues may include, but are not limited to:

- Issues that may affect the HRPDC/HRTPO's public image or citizen confidence.
- Personnel issue regarding any employee, such as performance evaluation, reasons for termination, reasons for not hiring, or harassment claims.
- Legal claims or lawsuits filed against HRPDC/HRTPO or any of its employees or agents.

Sensitive and controversial issues of interest to the media may be best assessed by asking the following:

- Is the issue a threat, existing or potential, to life, health or property?
- Could the issue likely be interpreted to negatively affect public confidence in/or opinion of HRPDC/HRTPO?
- Is the issue of particular interest to the general public?
- Are there legal ramifications, existing or potential, raised by the issue?
- Has more than one member of the media inquired about the same issue?
- Has someone threatened to go to the media about the issue?
- Is there unusual or inappropriate interest by a person or small group of people about a seemingly routine issue?

HRPDC/HRTPO Spokespersons

Inquiries from media outlets are given a high priority by HRPDC/HRTPO and should be responded to as quickly and efficiently as possible. Every effort should be made to meet media deadlines and to ensure that all information released is accurate. For commission wide inquiries, the spokesperson will most often be the Executive Director or Deputy Executive Directors. For department-related (routine) issues, the spokesperson will most often be the respective Principal. The Executive Director will be the spokesperson for all sensitive or controversial issues relating to the agencies and their respective departments.

Unless otherwise authorized, the HRPDC/HRTPO's spokespersons are:

- Executive Director
- Deputy Executive Director
- Principals (routine issues)
 - *Exceptions regarding departmental spokespersons may be made at the discretion of the Principal.*

HRPDC/HRTPO-Initiated Communications

Proactive media contact is sometimes initiated as a means of notifying the public of important information or upcoming events. This may be through news releases, media advisories, news briefings, news conferences, personal contacts with reporters, etc. Principals will work with the PICA Department or the Public Involvement & Title VI Administrator for scheduling media events and/or submission of media releases/advisories. All proposed communications shall be reviewed and approved by the appropriate Deputy Executive Director and Executive Director before release.

SOCIAL MEDIA

HRPDC/HRTPO Websites

- a. The authorized website of HRPDC is www.hrpdcva.gov. The authorized website of HRTPO is www.hrtpo.org. The websites are to be used as communications, awareness building, and image enhancement tools for the agencies, as well as an online portal for agencies' services. All departments should utilize the websites as an effective means to communicate with residents and targeted groups, including community leaders and organizations, local and potential businesses, current and potential residents, and employees. The websites should showcase HRPDC/HRTPO accomplishments, educate the community about the role of HRPDC/HRTPO as they relate to local jurisdictions and the community at large, and encourage the public's participation in the agencies' work, as well as serve as a resource for regional data.
- b. The websites are coordinated by the HRPDC/HRTPO Public Communications Departments. Requests for web design work for completely new web sections and related content for posting on the agencies' website will be routed through the Public Communications Departments.
- c. Departments are responsible for monitoring their respective areas on a monthly basis to ensure accurate and timely information. Each department will provide the Public Communications Departments with one contact, who will be responsible for the department's web content. Website submissions should meet the goals and expectations of the HRPDC/HRTPO as a whole.
- d. Content should fall within the parameters of agency policies and state and federal law, including copyright laws.
- e. Departments may not develop separate sites with separate web addresses (URLs) without written authorization from the Executive Director.
- f. Links to other websites are limited to government or public agencies; local organizations that receive HRPDC/HRTPO funding; or non-profit websites that have a formal, distinct and project-specific relationship with HRPDC or HRTPO.

Social Networking

- a. Official sites for HRPDC/HRTPO through social media and other digital applications carry the same weight as the agencies' official websites and must be treated with the same respect. Emerging online collaboration platforms are fundamentally changing the way local government is able to work and engage with citizens and community partners. Social networking can improve interactivity between government agencies and the public, and often reaches new and different populations from traditional media.
- b. Before a site is created a Department Principal shall contact the appropriate Deputy Executive Director to discuss the need for the creation of a site(s) such as Facebook, YouTube, Twitter, MySpace, Blogs, etc. The Principal must provide a business case for the need and for a social networking application. All sites must receive final approval from the Executive Director.
- c. Pages should be set up as the organization's page, not as an individual. The HRPDC/HRTPO Public Communications Departments will be notified of the creation of any HRPDC/HRPTO social networking site.
- d. One department employee should 'own' authority of the site. He/she should check it multiple times each day. No photos, video or documents will be posted to the site without approval of the Principal.
- e. When working in an official capacity while online, employees are still representing HRPDC/HRTPO and must abide by our standards of ethical conduct. Set forth below are several general areas of concern.
 - Do not say anything online that you would not say verbally in your official capacity.
 - Do not misuse your position for your own gain or to help others inappropriately.
 - Do not endorse any product, service, company, non-profit organization or any other enterprise
 - Do not divulge non-public information. This includes any information designated as confidential, privileged, or any other type of information that may not be disclosed, even if someone else asks you for it.
 - Do not engage in any partisan political activity.
 - Do not fundraise for any charitable organization.
- f. Where possible, social media pages shall clearly indicate they are maintained by the specific Commission department and shall have the department contact information prominently displayed.
- g. Where possible, social media pages should state that the opinions expressed by visitors to the page(s) do not reflect the opinions of the relevant department or HRPDC/HRTPO.
- h. Pages shall clearly indicate that posted comments will be monitored and that the department reserves the right to restrict or remove:
 - Profane, obscene or pornographic language or content or links to such language or content;
 - Solicitation of commerce, including but not limited to advertising of any business or product or sale;
 - Comments in support of, or in opposition to, any political campaigns or ballot measures;
 - Conduct or encouragement of illegal activity;
 - Defamatory or personal attacks;
 - Threats to any person or organization;
 - Conduct that violates any federal, state or local law;
 - Content that promotes, fosters, or perpetuates discrimination on the basis of race, color, creed, sex, age national origin or ancestry, physical or mental disability, veteran

status, parentage, marital status, medical condition, sexual identity, sexual orientation as well as any other category protected by federal, state or local laws.

- Comments on topics or issues not within the jurisdictional purview of HRPDC/HRTPO.
- i. Contact generated from unknown bloggers or other editors of social media sites or digital news sites should be directed immediately to the department Principal who will evaluate the media outlet and determine an appropriate response. The best response is to ask what information they need, and then tell them you will gather the information and call them back.
- j. HRPDC/HRTPO reserve the right to restrict or remove any content that is deemed to be in violation of this communications policy or any applicable law.
- k. HRPDC/HRTPO reserve the right to deny access to any department social media site for any individual who violates the HRPDC/HRTPO External Communications Policy, at any time and, without prior notice.
- l. If comments are positive or negative and in the context to the topic at hand, the content should be allowed to remain, regardless of whether it is favorable or unfavorable to HRPDC/HRTPO and/or its' respective departments.
- m. Like e-mail, communication via agency-related social networking sites is a public record. This means that both the posts of the Principal and any feedback by other employees or non-employees, including citizens, will become part of the public record. Because others might not be aware of the public records law, agencies should include the following statement (or some version of it) somewhere on the social networking site: *"Representatives of Hampton Roads Planning District Commission/Hampton Roads Transportation Planning Organization communicate via this Web site. Consequently any communication via this site (whether by a Commission employee or the general public) may be subject to monitoring and disclosure to third parties, including law enforcement."*
- n. No confidential information shall be posted/transmitted. This includes the prohibiting of posting and/or transmitting of photographs or videos related to department training, activities, or work-related assignments without express written permission from the Department Principal.
- o. The Executive Director has the authority to terminate social media accounts and pages.

RECORDS MANAGEMENT AND PRESERVATION

1. In the spirit of transparency, account administrators who receive messages through the private message service offered by the social media site shall direct the user to contact them at a public e-mail address maintained by their department. Alternatively, account administrators could reply to the inquiry using their HRPDC/HRTPO e-mail account. Departments should set all privacy settings to moderate. Again, comments expressing an opposing view point must be allowed. Departments should only remove comments that are spam, comments that would not be acceptable in a public forum such as a public hearing, or comments which fall into the categories of removable content listed above.

2. All comments or posts made to HRPDC/HRTPO department account walls or pages are public, not private, and are considered a public record under Code of Virginia 2.2-3704 and will be managed as such.

3. HRPDC/HRTPO must assume responsibility for public records and comply with the retention period set forth in their approved retention and disposition schedule. HRPDC must assign their own schedule of collection and disposal for social networking sites according to the administrative value of the record and permanently retain records with historical value.

Freedom of Information Act

The Freedom of Information Act, also known as (FOIA), is a federal statute that provides the public with the right to request access to records in the possession of government agencies. FOIA establishes a presumption that records are accessible to the people, except for those records protected from disclosure by any of the nine [exemptions contained in the law](#) or by one of three special law enforcement record exclusions. FOIA does not grant an absolute right to examine documents; FOIA establishes the right to request records and to receive a response to the request. If a record cannot be released, the requestor is entitled to be told the reason for the denial. The requester also has a right to appeal the denial and, if necessary, to challenge it in court.

The Rights of Requesters and the Responsibilities of HRPDC/ HRTPO under the Virginia Freedom of Information Act

The Virginia Freedom of Information Act (FOIA), located at § 2.2-3700 et seq. of the Code of Virginia, guarantees citizens of the Commonwealth and representatives of the media access to [public records](#) held by public bodies, public officials, and public employees.

A public record is any writing or recording -- regardless of whether it is a paper record, an electronic file, an audio or video recording, or any other format -- that is prepared or owned by, or in the possession of a public body or its officers, employees or agents in the transaction of public business. All public records are presumed to be open, and may only be withheld if a specific, statutory exemption applies.

The policy of FOIA states that the purpose of FOIA is to promote an increased awareness by all persons of governmental activities. In furthering this policy, FOIA requires that the law be interpreted liberally, in favor of access, and that any exemption allowing public records to be withheld must be interpreted narrowly.

FOIA Rights

- Citizens have the right to request to inspect or receive copies of public records, or both.
- Citizens have the right to request that any charges for the requested records be estimated in advance.
- If citizens believe that their FOIA rights have been violated, they may file a petition in district or circuit court to compel compliance with FOIA.

Making a Request from HRPDC/HRTPO

- Citizens may request records by U.S. Mail, fax, e-mail, in person, or over the phone. FOIA does not require that their request be in writing, nor do they need to specifically state that they are requesting records under FOIA. From a practical perspective, it may be helpful to both them and the person receiving their request to put their request in writing. This allows them to create a record of their request. It also gives us a clear statement of what records they are requesting, so that there is no misunderstanding over a verbal request. However, we cannot refuse to respond to their FOIA request if they elect to not put it in writing.
- Their request must identify the records they are seeking with "reasonable specificity." This is a common-sense standard. It does not refer to or limit the volume or number of records they are requesting; instead, it requires that they be specific enough so we can identify and locate the records they are seeking.
- Their request must ask for existing records or documents. FOIA gives them a right to inspect or copy records; it does not [apply](#) to a situation where they are asking general questions about

the work of HRPDC/HRTPO, nor does it require HRPDC/HRTPO to create a record that does not exist.

- They may choose to receive [electronic records](#) in any format used by HRPDC/HRTPO in the regular course of business.
- For example, if they are requesting records maintained in an Excel database, they may elect to receive those records electronically, via e-mail or on a computer disk, or to receive a printed copy of those records
- If we have questions about their request, they should cooperate with staff's efforts to clarify the type of records they are seeking, or to attempt to reach a reasonable agreement about a response to a large request. Making a FOIA request is not an adversarial process, but we may need to discuss their request with them to ensure that we understand what records they are seeking.

To request records from HRPDC/HRTPO, they may direct their request to the Executive Director. S/He can be reached at 723 Woodlake Drive, Chesapeake, VA 23320, 757-420-8300, 1-800-875-9788 (toll free), 1-800-390-2578 (TTY-toll free), 1-757-523-4881 (facsimile). They may also contact him/her with questions they have concerning requesting records from HRPDC/HRTPO. In addition, the Freedom of Information Advisory Council is available to answer any questions they may have about FOIA. The Council may be contacted by e-mail at foiacouncil@leg.state.va.us, or by phone at (804) 225-3056 or [toll free] 1-866-448-4100.

HRPDC/HRTPO's Responsibilities in Responding to Requests

- HRPDC/HRTPO must respond to a request within five working days of receiving it. "Day One" is considered the day after a request is received. The five-day period does not include weekends or holidays.
- The reason behind a request for public records from HRPDC/HRTPO is irrelevant, and they do not have to state why they want the records before we respond to their request. FOIA does, however, allow HRPDC/HRTPO to ask them to provide their name and legal address.
- FOIA requires that HRPDC/HRTPO make one of the following responses to their request within the five-day time period:
 1. We provide them with the records that they have requested in their entirety.
 2. We withhold all of the records they have requested, because all of the records are subject to a specific statutory exemption. If all of the records are being withheld, we must send them a response in writing. That writing must identify the volume and subject matter of the records being withheld, and state the specific section of the Code of Virginia that allows us to withhold the records.
 3. We provide some of the records they have requested, but withhold other records. We cannot withhold an entire record if only a portion of it is subject to an exemption. In that instance, we may redact the portion of the record that may be withheld, and must provide them with the remainder of the record. We must provide them with a written response stating the specific section of the Code of Virginia that allows portions of the requested records to be withheld.
 4. We inform them in writing that the requested records cannot be found or do not exist (we do not have the records they want). However, if we know that another public body has the requested records, we must include contact information for the other public body in our response to them.
 5. If it is practically impossible for HRPDC/HRTPO to respond to their request within the five-day period, we must state this in writing, explaining the conditions that make the response impossible. This will allow us seven additional working days to respond to their request, giving us a total of **12** working days to respond to their request.

- If they make a request for a very large number of records, and we feel that we cannot provide the records to them within 12 working days without disrupting our other organizational responsibilities, we may petition the court for additional time to respond to their request. However, FOIA requires that we make a reasonable effort to reach an agreement with them concerning the production of the records before we go to court to ask for more time.

Costs

- They may have to pay for the records they request from HRPDC/HRTPO. FOIA allows us to charge for the actual costs of responding to FOIA requests. This would include items like staff time spent searching for the requested records, copying costs or any other costs directly related to supplying the requested records. It cannot include general overhead costs.
- If we estimate that it will cost more than \$200 to respond to their request, we may require them to pay a deposit, not to exceed the amount of the estimate, before proceeding with their request. The five days that we have to respond to their request does not include the time between when we ask for a deposit and when we respond.
- They may request that we estimate in advance the charges for supplying the records that they have requested. This will allow them to know about any costs upfront, or give them the opportunity to modify their request in an attempt to lower the estimated costs.
- If they owe us money from a previous FOIA request that has remained unpaid for more than 30 days, HRPDC/HRTPO may require payment of the past-due bill before we will respond to their new FOIA request.

Commonly Used Exemptions

The Code of Virginia allows any public body to withhold certain records from public disclosure. HRPDC/HRTPO will withhold records subject to the following exemptions:

- Personnel records (§ 2.2-3705.1 (1) of the Code of Virginia)
- Records subject to attorney-client privilege (§ 2.2-3705.1 (2)) or attorney work product (§ 2.2-3705.1 (3))
- Vendor proprietary information (§ 2.2-3705.1 (6))
- Records relating to the negotiation and award of a contract, prior to a contract being awarded (§ 2.2-3705.1 (12))

PERSONAL USE OF MEDIA DURING WORKING HOURS

Broadcast/Print Media

- a. Letters to the Editor may not be prepared on agency time, printed on agency letterhead, mailed at agency expense or emailed from an agency email address.
- b. Responses or letters to the media shall not include the employee's official title or imply that comments are made on behalf of HRPDC/HRTPO. You should include a sentence stating that you are speaking as a private citizen. Similar disclaimers must be given if an employee addresses a public meeting, participates in a radio talk show, or is interviewed for a radio or television program unless the employee is officially representing HRPDC/HRTPO.

PERSONAL USE OF MEDIA OUTSIDE OF WORKING HOURS

Social Media

- a. As a citizen, as well as an employee, you can, of course, use social media in all the same ways as anyone else outside of work hours. It is important to recognize however, that what you publish on the Internet may reflect on your employer, HRPDC/HRTPO. Employees who use social media for personal purposes should be mindful of the HRPDC/HRTPO Personnel Manual: *"Any action by an employee that negatively reflects on or otherwise discredits HRPDC/HRTPO (through speech pursuant to official duties, or related to matters of personal interest), or which is a direct hindrance to effective performance of an employee or HRPDC/HRTPO, may result in disciplinary action"* Therefore, while HRPDC/HRTPO employees are free to express themselves as private citizens on social media sites; such communications should not impair working relationships, impede the performance of duties, impair discipline and harmony among coworkers, or unduly impede the performance and abilities of the HRPDC/HRTPO.
- b. When using social media, department personnel should be mindful that their speech becomes part of the worldwide electronic domain. Therefore, adherence to HRPDC/HRTPO's prohibition on harassment and discrimination is strongly recommended in the personal use of social media. Employees who use social media for personal purposes should:
 - Use a disclaimer anywhere there may be uncertainty about the capacity in which they are acting. A disclaimer, such as: *"The postings on this site are my own and do not represent the views or opinions of my employer"* can help protect you;
 - Recognize that anything posted on the Internet is there for good. Even if you attempt to delete the post, photo, comment, etc., it is likely that it has been stored in any number of other places. Content posted to the Internet should be thought of as permanent;
 - Avoid sharing confidential or otherwise sensitive government material in a personal space. Try and keep your personal online presence and your work online presence separate;
 - Respect copyright and fair use;
 - Above all use common sense.
- c. For Individuals who hold senior positions, or who work in politically sensitive areas, a disclaimer does not by itself exempt them from special responsibility when posting online. By virtue of their position, these individuals should consider whether personal thoughts they publish may be misunderstood as expressing the positions or opinions of HRPDC/HRTPO. For individuals in positions like this, caution is especially advisable.

SECURITY GUIDELINES

1. From a security standpoint, social media users should be mindful of how to best prevent fraud or unauthorized access to either social media sites or the HRPDC/HRTPO network. In almost every case where an attacker accesses a system without authorization, they do so with the intent to cause harm. The harm intended may be mild, such as: making unofficial posts, tweets or messages—possibly of an embarrassing nature—that will be seen by the public as official messages, using the compromised site to spread malware, or encouraging users to either click links or download unwanted applications that the attacker has added to the site.
2. In general, users should show caution when interacting with external entities, those both known and unknown to the user. If at all in doubt of the legitimacy of any information sent to you, please avoid linking to external sites.
3. In order to prevent potential harm, users of social networking sites should minimize the amount of information an attacker is likely to gain from a successful attack. For example, individual user IDs and passwords should not be duplicated across multiple sites. In this way, if one site is compromised, the attacker cannot also gain access to other sites for which the user is authorized. For added security the following guidelines should be adhered to:
 - Follow agency password policy.
 - Refrain from adding, installing, attaching or linking to any additional external services or applications that may potentially grant or enable access to the content, information or posts within the Social Media account.
 - Use caution when accessing links received from External Entities.
 - Exercise caution when utilizing shortened links (links that have been shortened for ease of relaying the original link), as these may lead to a malicious site. Avoid clicking on shortened links. Consider requesting the link be re-sent in another form.
 - Be watchful for spoofed emails and/or website (seemingly official-looking communications that lead the user to a malicious website or attempt to solicit the user's personal or financial information). Consult the IT Manager regarding any security related matter.
 - If there is ever a breach of computer security that compromises personal information, you must contact the Executive Director immediately, as HRPDC/HRTPO may have a duty to notify the individuals whose information was compromised.

POLICY VIOLATIONS

Violation of the standards of this External Communications Policy may result in disciplinary action, up to and including dismissal, as determined by the Executive Director in accordance with the HRPDC/HRTPO Personnel Manual.

This Policy will not be applied in a manner that violates the legal rights of any party pursuant to applicable law.