

## Missoula County Communications Policy

### Purpose

The County recognizes the most effective and efficient methods to communicate about its initiatives and operations are to work in partnership with news media, generate social media content and ensure the County website provides accurate, timely information. This policy establishes guidelines and procedures to coordinate County-wide communications, ensuring our message is accurately and thoroughly provided to the public through traditional, digital and social media.

### Scope

This policy is applicable to all County departments. Elected officials and department heads are encouraged to coordinate communications efforts with the Communications Division.

### Limitations

External communications with the media should have a public purpose and serve the public interest. Policies apply to all Missoula County employees while they are at work and are therefore representatives of their employer. Employees should refer to the State Code of Ethics when speaking as an individual citizen outside their employment or professional capacity with Missoula County to ensure their rights and responsibilities are clear.

### Administration

Department heads are responsible for policy implementation within their departments and employee compliance with the policy. Application of these guidelines is at the discretion of the department head. All non-elected Missoula County employees represent Missoula County when speaking to the media in their professional capacity. Department heads are asked to consider these guidelines in an effort to ensure coordinated County-wide communications and accurate public information.

### Other References

Media Relations Guide, Website Guidelines, Social and Digital Media Guidelines, Electronic Communications Policy, Employees Acting as Private Citizens Guidelines, Montana State Code of Ethics, Media Relations Guide, Editorial Style Guide, Social Media Guide.

## **POLICY GUIDELINES**

### **1. COMMUNICATIONS WITH MEDIA SOURCES**

#### **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 Division will assist to determine the credibility and validity of the media outlet.

**Routine Media Request** – a request for factual information about the County that is readily available and noncontroversial. 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 is issued. Examples include: an interpretation of policy, a request for employment records for a County employee, an inquiry about a high-profile project or event, or a response to a public emergency or disaster.

Note: Staff should refer all requests for public records to missoulacountymt.nextrequest.com, including those from media.

### **Communications with the Media Generally**

Journalists are looking for the full story, which includes a variety of perspectives on a particular topic and/or issue. As such, it is very likely several departments will be contacted by the media, as well as one or more elected officials. In order to have a consistent and accurate message, coordination of all County-wide communications is paramount. Every media inquiry is an opportunity for County staff to talk about what they do and why they do it.

The role of the media is primarily to inform their audience of unbiased news as quickly, accurately and comprehensibly as possible. Missoula County communications efforts should provide the media with information needed to support news. A department, their leadership or an elected official often are trusted media sources. Missoula County's function to deliver factual content to reporters/outlets defines local government's responsibility to the media, but also defines the responsibility to share this information with the public.

### **Media Inquiry**

Missoula County prioritizes inquiries from media outlets and strives to issue a response as quickly and efficiently as possible. County staff should make every effort to meet media deadlines. Department heads often receive the highest volume of media inquiries, yet also tend to have less time available to prepare for a media interview, or to respond immediately. However, positive working relationships with members of the media are important. Staff should make a courtesy call to the reporter acknowledging the request and providing an estimate of when they will provide a response. It is appropriate for either a department administrative staff member or the Communications staff to return this call. It is the responsibility of the County employee contacted by the media to respond appropriately once prepared and available for interview.

Taking the time to prepare for an in-depth interview can be difficult, especially on short notice. However, the more time you can give to a reporter to answer his/her/their questions increases the likelihood that information will be accurate and in the appropriate context. Refer to the [Media Relations Guide](#) for guidance.

### **Communicating with Media Outlets**

The Communications Division supports and coordinates media relations for County departments at their request. In order to properly coordinate across departments and inform the Board of County Commissioners, with the exception of routine media requests, media inquiries received by County staff should be referred to the department head and the Communications Division along with the reporter's name, phone number, topic of story and deadline as soon as possible. The staff member receiving the inquiry should inform the media representative that the department head or the Communications Division will respond as soon as they are available. The Communications Division should be notified about routine and non-routine media inquiries following the request. Non-routine media requests should be discussed with the

Communications Division prior to response to ensure an accurate and contextually appropriate response is provided.

Oftentimes, more than one County department is approached by the media for a story. By briefing the Communications Division on interview requests, staff can better facilitate media interactions across departments. This ensures the County communicates a thorough, consistent message to the public.

As even seemingly routine media requests may be used to contribute to a larger story that may become controversial, it is important that the Communications Division be informed each time there is a contact from a media representative. An email to that effect will suffice.

Communications Division staff are happy to sit in on any interview to provide support and feedback.

County staff should also be aware that when they present an item at a commissioners' public meeting, what they say during that meeting may be quoted in the media. Media may or may not follow up with the staff member, depending on whether they have additional questions.

### **County 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 head for department-level issues. The Communications Division is available to assist in coordinating a timely, accurate and thorough response.

Exceptions regarding departmental spokespersons may be made at the discretion of the department head.

### **Sensitive or Controversial Issues**

Because sensitive or controversial issues have the potential to consume the most time providing accurate and thorough information, the Communications Division should be notified immediately when a sensitive or controversial issue is identified or when an emergency situation 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 Division. In an emergent situation (i.e., fire, flood, earthquake or other emerging incident) the chief administrative officer will communicate with the Communications Division manager 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 Missoula County or any of its employees or agents;
- Issues that may affect the County's public image or resident confidence.

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 a negative interpretation of the issue affect public confidence in, or opinion of, Missoula County government and/or its departments?
- 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 interest by a person or small group of people about a seemingly routine issue?

### **Legal Issues**

Inquiries regarding pending litigation, exposure to litigation or settled litigation should be referred to the county attorney, chief people and risk officer, chief administrative officer, communications manager or the person designated to speak on behalf of the issue.

### **Personnel Issues**

Inquiries regarding personnel-related information should be referred to the Human Resources Department. The communications manager will coordinate a response with the chief administrative officer and the HR director.

### **Public Safety Issues**

During a major emergency (i.e., severe weather, wildfire, etc.), the procedure for handling the media is contained in the County's Emergency Operations Plan. The plan designates the County's 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 a representative of the Sheriff's Office, the Office of Emergency Management, the Health Department or the Commissioners' Office. Because the Sheriff's Office and Office of Emergency Management operate on a 24/7 schedule and their work generates a high volume of media calls, those departments have designated personnel as media spokespersons for routine public safety issues and follow specific guidelines when releasing information.

### **Financial or Tax Issues**

Inquiries regarding Missoula County finance or taxes should be referred to the chief financial officer, the chief administrative officer or the clerk & recorder/treasurer. The communications manager will work with them to coordinate a response.

### **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 Division, who will evaluate the media outlet and determine an appropriate response.

### **Errors in Reporting**

Errors in reporting should be brought to the attention of the Communications Division, who will coordinate a correction with the designated media outlet, if appropriate.

### **County-Initiated Communications**

The Communications Division is responsible for proactively contacting the media. This includes issuing news releases and media advisories and personal contacts with reporters, editors and other media professionals. Departments seeking publicity for events or activities should request assistance from the Communications Division at least two weeks in advance of the date of desired media coverage. Staff should consult with the Communications Division before issuing a news release to ensure it is consistent with other County messaging.

Departments are strongly encouraged to submit requests for communications assistance as soon as the need is identified to ensure that the Communications Division has adequate time to coordinate and provide support.

Occasionally, news briefings or news conferences may be held to provide media with in-depth information about an issue or to announce or respond to an issue of significance. The Communications Division can schedule and support such media events if desired.

## 2. SOCIAL AND DIGITAL MEDIA

### **Definitions**

**Social Media** – Websites and applications that enable users to create and share content or to participate in social networking.

**Blog** – A website containing a writer's or group of writers' own experiences, observations, opinions, etc., and often having images and links to other websites. The term is an abbreviated form of 'web log.'

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

Information posted to a social media site can add to the public's understanding of a department or of a specific project. Missoula 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.

Emerging online collaboration platforms are fundamentally changing the way local government engages citizens and community partners. It is important for Missoula County to be aware of and participate in this network of information, interaction and idea exchange.

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 that increase the County's ability to broadcast its messages to the widest possible audience.

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

Inappropriate use of 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 commercial or political activities; and disclosure of confidential or proprietary information. Inappropriate use of social media may be grounds for disciplinary action.

### **Site Creation**

A department head should advise the Communications Division before developing social media tools. Pages and related content must represent the county department, not any individual. The Communications Division is available to provide professional and technical assistance.

## **Social Media Account Security**

1. All social media account security is managed by the Missoula County Communications Division. All departments with existing social media accounts are required to set up administrative access with the Communications Division. Any new accounts will be set up through the Communications Division, which will then grant permissions to the appropriate department staff. To protect account security, all county social media accounts must set up two-factor authentication on platforms for which it's available.

### **Facebook**

1. Missoula County Communications employees will be the only users designated as "admins" of Missoula County Facebook pages.
2. Communications will manage Page Security.
3. Department users will be designated with Facebook security role of "editor" or below. To protect account security, all staff with access to a county Facebook account are required to enable two-factor authentication on the account they use to manage the page. Instructions on setting this up [can be found online](#).
4. Department users will request access to pages by contacting the communications manager. The communications manager will add staff to the requested page via their county email address.

### **Twitter/X**

1. Missoula County Communications will manage access to Missoula County Twitter/X accounts.
2. Department users will request access by contacting the communications manager.

### **Other Social Media Accounts**

1. When applicable, accounts should use a Missoula County department email address.
2. Department users will provide Missoula County Communications with account credentials.
3. Department user will change the account password immediately following employee turnover to prevent improper access.
4. Department user will notify Communications of any changes to account credentials.

## **Social Media Account Archiving**

Missoula County Communications will manage the archiving of all Missoula County social media data to meet statutory requirements. Following the procedures outlined in the Account Security section will ensure social media accounts are connected to the software the County uses to automatically archive all social media content.

## **Maintenance of the Site**

The department head should designate an employee to 'own' authority of the social media account. It should be reviewed daily, and content regularly updated. The department head is ultimately responsible for all site content. The communications manager may recommend termination of any site to the department head if content is inappropriate, not applicable to the County, serving little to no public purpose or is infrequently updated.

## **Employee Commitment**

County employees are obligated to be aware of and comply with the Electronic Communications Policy and the applicable provisions of Missoula County Human Resources Policies. Before engaging in any activity involving social media, the designated 'owner' of the department's account should read "Social Media Guidelines Use" form and confirm their review of the guidelines with their department head.

### **User Interaction and Comments Policy**

County-created social media postings allowing comments must be structured to focus discussions on County services and programs. Because Missoula County is a public agency subject to the First Amendment, we are limited in our ability to moderate or delete comments from the public, even those considered vulgar, disrespectful or otherwise inappropriate. Staff should not turn on profanity filters or any other function that automatically hides comments.

Any County-affiliated social media site that allows comments should include the following advisory:

*“The purpose of this site is to present matters of public interest to Missoula County, including its many residents, businesses and visitors. We encourage you to submit your questions, comments and concerns in a respectful manner. Please note that as a public agency subject to the First Amendment, Missoula County is limited in its ability to moderate or delete comments in a public forum. This includes comments that some may deem vulgar, disrespectful or otherwise inappropriate. Comments and communications may be subject to the terms of service of the service provider, which is beyond County control.” Pages may also refer to this advisory by including a link to missoula.co/socialmedia.*

Generally, only comments with obscenity and direct actionable threats are subject to removal. If staff believe a comment meets this threshold, they must consult with the County Attorney’s Office before removing it. Staff also should not block a user from a social media account without consulting an attorney with the County Attorney’s Office.

If staff encounter a comment that does not reflect the County’s values but the County Attorney’s Office determines it cannot be removed, staff are encouraged to add to (edit) the original post and/or reply to the comment with the following language:

“EDIT: Comments on this post do not necessarily reflect the viewpoint or values of Missoula County. As a public agency subject to the First Amendment, Missoula County is limited in its ability to moderate or delete comments in a public forum.”

Staff who manage county social media accounts may turn off comments on posts on platforms that have this function, but only if there are no comments on the post already. Staff should not turn off the comment function if users have already commented. If staff do not want to allow comments on a post, best practice is to turn them off before publishing a post, or as soon as it’s published, depending on the functionality of the platform.

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. Best practice is to leave the comment published and respond with accurate information.

### **Mistakes**

County-generated information containing misinformation or factual errors shall 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 has been 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. Deleting and reposting has the tendency to look conspicuous, while correcting an error demonstrates taking responsibility for the error and ensuring accurate information is now being

shared. If the platform allows posts to be edited, the page manager should also add the correction to the top of the original post. This will ensure that accurate information is included if users continue to share the original post.

### **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 are considered public records and may be required to comply with applicable records retention policies.

The department is responsible for following the County's public records policy and procedures for any public records requests arising from the social media sites it maintains.

### **Third-Party Access to County Social Media Accounts**

When contracting with an outside vendor to run paid social media campaigns, it may be necessary for departments to grant the vendor temporary access to County social media accounts. For Facebook and Instagram, staff should follow [Meta's process for granting third-party access.](#)

Staff should consult with the communications manager before granting access to other social media platforms that require sharing usernames and passwords for access.

When planning to provide third-party access to a social media account, staff must include the following language in the professional services agreement or contract with the vendor:

*"County shall allow VENDOR temporary access to SOCIAL MEDIA PAGE for the limited purpose of distributing content in compliance with this agreement. Such permission is granted contingent with VENDOR's compliance with all applicable terms of service, state and federal laws, and the County's social media policy, which VENDOR acknowledges receipt of."*

## **3. CONTENT**

### **Photos and videos**

County staff are encouraged to use photos and video to help illustrate Missoula County services and programs. Any photos or videos a County employee produces on work time for work purposes are considered property of Missoula County, and the County maintains discretion over sharing photos or videos with outside organizations. Staff are encouraged to reach out to Communications staff for access to high-resolution photos of County buildings, programs and staff.

### **Commercial vs. editorial**

When intending to use photos or video for commercial use, it is recommended that staff have subjects sign a [photo and video release form](#). It is recommended that staff obtain written permission from parents or guardians when taking photographs of children.

Photos and videos are generally considered for commercial use when they:

- focus on individual people (i.e., not crowd shots) and will be purposely used to advertise a county service or program that generates revenue (i.e., the Western Montana Fair)
- focus on individual people and will be purposely used to promote a specific county service or program on the county website, marketing materials or paid advertising of any kind
- are staged in any way

- are not intended to signify a specific day, time or event
- may be significantly altered or enhanced to suit a particular communication need

Photos and videos are generally considered for editorial use when they:

- are for the purpose of documenting a public meeting or other county event in a public space, including but not limited to county property
- will be used to educate constituents about a county initiative or program in unpaid social media posts or other communications channels
- will be used to illustrate recent county news and developments (i.e., news items and media releases)
- are spontaneous, not staged
- illustrate or signify a specific day/time/event
- will not be significantly altered or enhanced

### **Written content**

When writing content for public consumption, staff should strive to adhere to the best practices outlined in the [Editorial Style Guide](#) and [Social Media Guide](#), especially the guidelines around creating accessible content.

## **4. LOGO AND BRANDING**

To effectively and professionally communicate the breadth of programs and services Missoula County provides, the County has adopted a standard logo, as well as style guidelines, for use in official County communications. This includes all printed and digital materials, signage and videos.

To further a clear, consistent and professional identity, departments should use the Missoula County courthouse dome logo that commissioners adopted in January 2021. This includes use of the provided templates for letterhead, envelopes, business cards and any other printed materials that feature the logo. Departments can use up materials with the retired “MC” logo, but all new materials should feature the courthouse dome logo. Departments should update any digital materials, such as email signatures and digital letterhead, with the new logo. Departments may request a lock-up version that includes their department name by contacting the Central Services Print Shop.

Departments that serve more specific audiences and have developed branding tailored to those audiences can continue to use that branding. The courthouse dome logo should be used in communications to complement that branding, when appropriate, to strengthen the department’s association with Missoula County.

Downloadable files of the logo, as well as the style guidelines and templates, are available on the [Communications Sharepoint site](#).

## **5. EMPLOYEES ACTING AS PRIVATE CITIZENS GUIDELINES**

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

Any contact with the media should not include reference to the employee’s position with the County or include a statement such as “I’m a deputy sheriff, but I’m acting as a private citizen.” This language publicly acknowledges your role within the community and your words are likely then attributed to the County.

Letters to the editor should not be prepared on county time, printed on county letterhead, mailed at County expense or emailed from a county email address. Telephone contact with reporters outside of county professional capacity must not be made on County time using County telephones. Calls to radio talk shows shall not be made on county time using County telephones.

### **Employee Social Media Participation**

Missoula County understands that employees may maintain or contribute to personal blogs, message boards, conversation pages and other forms of social media outside of their job functions and may periodically post information about their jobs or Missoula County's activities on these outlets. If an employee posts Missoula County or job-related information, they should exercise good judgment and abide by Missoula County policies.

Personal participation on external media platforms should not use Missoula County's name as part of any online identity (i.e., username, "handle" or screen name), nor should they speak as a representative of the County.

### **County Employee Social Media Terms of Use**

#### **Blogs, wikis, social networks, virtual worlds and other social media**

These guidelines apply to all Missoula County employees who participate in any form of social networking **on behalf of the County**. First and foremost, County employees are obligated to be aware of and comply with all applicable statutes set forth in the Missoula County personnel policies, including the Technology Appropriate Use Policy.

#### **Employee Commitment:**

*Before creating any external social media site representing County departments, the site administrator should consider the following:*

- I know and will follow all Missoula County personnel policies.
- I will stick to my area of expertise. I am sharing information with a mass audience and it will be archived for years. I will take this role and its responsibility seriously.
- I will be transparent. If I am dishonest or try to write anonymously, I will lose readers and credibility for myself and the County. If I have a vested interest in a topic, I will say it up front.
- I will post links to new articles/research that will interest my readers. This will provide a service to the readers and generate links back to the site.
- I will not speculate. I will not repeat rumors. If I don't know it to be true, I won't say it.
- I will not try to be first to share information with the public. If I know something that should be used in a news release or on the County's other sites, I will contact my department head and the Communications Division.
- I will not argue with readers. People may disagree with my perspective at some point. I will respectfully clarify my position, if needed, but I will not engage with them in an argument.
- I will be the first to correct my own mistakes, and I will not alter previous posts without indicating that I have done so.
- I will never address personnel issues. They are protected by law.
- I will take care to ensure that I am always representing the best interests of Missoula County in a professional manner.
- I will not use county sites to raise money.

- I will add value to the public dialogue on the issues that are in my purview by providing worthwhile information.