

LOUISIANA COMMUNITY & TECHNICAL COLLEGE SYSTEM
Policy # 6.027

Title: INTERNAL AND EXTERNAL COMMUNICATION

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The intent of this policy is to establish guidelines to govern official LCTCS and LCTCS colleges' publications, communication with mass media, electronic and online publications, and public service radio and television programs, which reflect on the role, scope and mission of Louisiana's community and technical colleges.

To ensure that specific wording throughout this policy is understood, the definition section has been provided.

General Definitions

Custodian – public official or head of any public body having custody or control of a public record, or a representative specifically authorized by him to respond to requests to inspect any such public records. (per Louisiana Revised Statutes 44.1)

Requestor – person requesting information of the institution.

Public Information – All books, records, writings, accounts, letters and letter books, maps, drawings, photographs, cards, tapes, recordings, memoranda, and papers, and all copies, duplicates, photographs, including microfilm, or other reproductions thereof, or any other documentary materials, regardless of physical form or characteristics, including information contained in electronic data processing equipment, having been used, being in use, or prepared, possessed, or retained for use in the conduct, transaction, or performance of any business, transaction, work, duty, or function which was conducted, transacted, or performed by or under the authority of the constitution or laws of this state, or by or under the authority of any ordinance, regulation, mandate, or order of any public body or concerning the receipt or payment of any money received or paid by or under the authority of the constitution or the laws of this state (per Louisiana Revised Statutes 44:1) Information that is not public – Any documentary material of a security feature of a public body's electronic data processing system, information technology system, telecommunications network, or electronic security system, including hardware or software security, password, or security procedure, process, configuration, software, and code is not a "public record". (per Louisiana Revised Statutes 44:1)

Active Use – document requested is being used by staff to perform a task that is essential to the daily operation of the institution. (i.e., a policy manual being used to draft new policy or a report

being used to draft a document.)

Dramatic changes – changes that are striking in appearance or effect (i.e. major alterations to approved logo such as name or emblem change, which do not include color changes, size changes or usage.)

Centralization of News Efforts

In an effort to provide accurate and timely information to the mass media, it is essential that the LCTCS colleges and System Office maintain a centralized news effort so that media will receive an organized flow of information that is consistent in style, quality, and content. It is the responsibility of each of the LCTCS colleges to develop an internal system to accommodate media requests. Within the LCTC System Office, the planning, research, writing, and distribution of news items, statements, public service announcements, feature articles, and other informational materials (including photographs) released to the media is centralized in and coordinated by the Office of External Affairs, with the approval of the President (who serves as custodian of System Office records).

The intent of this policy is not to handicap or restrict faculty or staff employed by the System from expressing their opinions or providing information to media representatives regarding their research and/or areas of expertise. It does apply, however, to questions regarding System policy, which should be referred to the Office of the President, which will work with the Office of External Affairs for response.

In instances of direct media contact, faculty and staff members may ask to call the reporter back and contact the Office of External Affairs for advice and counsel before consenting to interviews, particularly on sensitive questions. Employees should always state that their views given are personal opinions and not necessarily those of their colleagues, the College where they are employed, or the System Office.

In an emergency, crisis, or controversy, the President of the System may designate a spokesperson for the System. In that event, all calls from media regarding that particular situation will be referred to the spokesperson through the Office of External Affairs.

In all circumstances that may have an impact upon System policy, the President and the Office of External Affairs will be consulted.

Requests for Information

The President serves as custodian of System Office records, documents, writings, letters, memoranda, or other written, typed, copied, electronic or developed materials possessed, assembled by the System Office. Likewise, the Chancellor of each LCTCS college is designated the custodian of all records maintained by the college.

- If there is a request for information at an LCTCS college or the System Office, this request should be directed to the appropriate custodian (the Chancellor or President), or his/her

designee(s) immediately upon receipt. The custodian or his/her designee will forward the request to the appropriate individual(s).

- The System requires individuals that have a desire to examine or receive copies of information to provide a written request, which includes the documents requested. This will assist staff in responding specifically to the request, i.e., providing the requested information for examination or for copies, if applicable, in a timely manner.
- The CEO of the particular institution or his/her designee(s) shall make a determination as to whether or not the information requested is public information. If found to be public information, the document(s) will be released immediately.
- If the requested document(s) is not public information, the requestor will be informed by the responsible party (in writing) and such information will not be released (specific guidelines outlined in the section “Determining whether information is public information.”)

Determining whether information is public information

In instances where the responsible party is unable to ascertain whether or not the information requested is public information, the institution’s CEO or his/her designee shall seek an opinion from legal counsel on the status of the information.

The custodian or his/her designee shall within three (3) days (excluding Saturdays, Sundays and legal holidays) of the receipt of the request notify the requesting party of the determination and the reasons therefore.

If the information is deemed public in nature, it will be immediately released for examination or for duplication (if applicable).

(Information in this section derived from Louisiana Revised Statutes 44.32 D).

Availability of Records

If the information requested is not immediately available because it is in active use (as defined in the definition section), the custodian or his/her designee(s) will “certify” this in writing to the requestor, and shall fix a day and hour within three (3) working days not including Saturdays, Sundays, and legal holidays, when the information can be examined and/or copies can be provided (per Louisiana Revised Statutes 44.33 B).

If any record applied for by any authorized person is not in the custody or control of the custodian or his/her designee, the custodian or his/her designee shall certify this in writing to the requestor and shall in the certificate state in detail to the best of his/her knowledge and belief, the reason for the absence of the record from his custody or control, its location, what person then has custody of the record and the manner and method in which, and the exact time at which it was taken from his custody or control. He/she shall include in the certificate ample and detailed answers to inquiries of the requestor which may facilitate the exercise of the right granted by RS 44:34 (per Louisiana Revised Statutes 44:34)

Duty to permit examination; prevention of alteration; payment for overtime; copies provided; fees

The custodian shall present any public record to any person of the age of majority who so requests. The custodian shall make no inquiry of any person who applies for a public record, except an inquiry as to the age and identification of the person and may require the person to sign a register and shall not review, examine or scrutinize any copy, photograph, or memoranda in the possession of any such person; and shall extend to the person all reasonable comfort and facility for the full exercise of the right granted by RS 44:32; provided that nothing herein contained shall prevent the custodian from maintaining such vigilance as is required to prevent alteration of any record while it is being examined; and provided further, that examinations of records under the authority of this Section must be conducted during regular office or working hours, unless the custodian shall authorize examination of records in other than regular office or working hours. In this event the persons designated to represent the custodian during such examination shall be entitled to reasonable compensation to be paid to them by the public body having custody of such record, out of funds provided in advance by the person examining such record in other than regular office or working hours. (per Louisiana Revised Statutes 44:32 A)

If any record contains material which is not a public record, the custodian may separate the nonpublic record and make the public records available for examination. (per Louisiana Revised Statutes 44:32B)

No fee shall be charged to any person to examine or review any public records, except as provided in RS 44:32, and no fee shall be charged for examination or review to determine if a record is subject to disclosure, except as may be determined by a court of competent jurisdiction.

For all public records of state agencies, it shall be the duty of the custodian of such records to provide copies to the requestor. If copies of information are requested, the copies will be provided at fees established by the Commissioner of Administration (per Louisiana Revised Statutes 39:241). (Louisiana Revised Statutes 44:32 2)

Publications

It is the responsibility of the individual LCTCS colleges to establish specific guidelines for the printed matter produced in their Offices of Public Relations. To ensure that printed matter developed on behalf of the LCTC System Office for public distribution accurately reflects the goals and image of the LCTCS, it is desirable that uniform practices be followed in planning, editing, designing, purchasing, and producing such materials. Therefore, supervision and production of System promotional publications is coordinated by the Office of External Affairs, and must be approved by the System's chief public information officer to ensure that they contribute to and reflect favorably on the System.

Logos

In an effort to ensure that LCTCS logos are consistent with the vision of the System, new designs

for any LCTCS college or the System Office logo or dramatic changes to existing logos must be submitted to the LCTCS President for approval. Dramatic changes are defined under the definition section of this policy.

System Seal

Use of the LCTCS seal is governed by the LCTCS Board of Supervisors. Documents where the seal may be used are (1) diplomas and certificates evidencing completion of degree requirements from an LCTCS college, and (2) all contracts and documents that require the signature of the president of the LCTC System involving purchasing, selling, or leasing of land or facilities of the Board of Supervisors, if such documents require a seal.

Other uses of the LCTCS seal will be determined by the System's chief public information officer.

Letterhead

New designs or changes to existing LCTCS college letterhead shall be submitted to and approved by the college chancellor or his/her designee. Any college that alters its letterhead, shall forward a draft of the letterhead to the System Office as a "for your information (FYI)" item. However, if the logo on the letterhead is altered dramatically and was not pre-approved, the logo should be sent forward to the System President for review and approval, prior to adopting the newly designed letterhead.

LCTCS letterhead shall not be used for non-LCTCS purposes.

Photography and File Footage

Prior to taking photographs, it is suggested that all LCTCS colleges and the System Office have persons being photographed sign release forms so that photographs can be used for a variety of college promotional purposes (i.e., posters, event schedules, calendars, or general marketing practices.) to ensure that photographed subjects do not pursue legal action in regards to use of the property. The LCTCS encourages the mass media to use photographs released by the System or file footage gathered in System colleges only for illustration of LCTCS-related news or feature stories.

Electronic Media

To ensure that public service radio and television commercials and programs promoting the LCTCS colleges and all recruiting and promotional radio and television products about the LCTCS colleges effectively and uniformly reflect the goals and image of the LCTCS, all such electronic media presentations shall be approved by the college chancellor or his/her designee. The President of the LCTCS or his/her designee shall approve promotional communications developed on behalf of the System Office.

Telephone/E-Mail/Voice Mail/Internet Usage

All electronic and telephonic communication systems and all communication and information transmitted by, received from, or stored in LCTCS systems are property of the LCTCS, and as such are intended to be used for business purposes only.

- All telephonic/e-mail/voice mail/internet records are considered LCTCS records and should always ensure that the business information contained in these messages is accurate, appropriate and lawful.
- While the LCTCS does not intend to regularly review employee telephone/e-mail/voice mail/internet records, employees have no right or expectation of privacy in utilizing these systems. LCTCS and/or the State of Louisiana own the telephone, computer and software making up these systems and permits employees to use them in the performance of their duties for the LCTCS. Such records are to be treated liked LCTCS paper files, with the expectation that anything in them is available for review by authorized representatives of the LCTCS.
- Abuse of telephone/e-mail/voice mail/internet systems, through improper personal use, or use in violation of the law or policies of the LCTCS, will result in disciplinary action, up to and including termination of employment.

Solicitations, Distributions, And Use of Bulletin Boards

- LCTCS employees may not solicit other employees during working time, nor may LCTCS employees distribute non-work-related literature in work areas at any time.
- Persons not employed by LCTCS may not solicit LCTCS employees for any purpose on LCTCS premises.
- LCTCS staff bulletin boards should generally be maintained for posting of business related information and announcements. The System Office and each college shall develop an operating policy for posting of information on staff bulletin boards. All posted information must have authorization from the area identified in the operating policy.