



WESTERN OKLAHOMA WORKFORCE DEVELOPMENT BOARD

1222 10th Street, Suite 115, Woodward, OK 73801

Workforce Innovation and Opportunity Act

Public Relations and Communications Policy

No individual in the United States may, on the basis of race, color, religion, sex, national origin, age, disability, or political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship or participation in any WIOA Title I-financially assisted program or activity, be excluded from participation in, denied the benefits of, subjected to discrimination under, or denied employment in the administration of or in connection with any WIOA Title I-financially assisted program or activity.



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“Equal opportunity employment/program. Auxiliary aids and services are available upon request to individuals with disabilities.”

PUBLIC RELATIONS AND COMMUNICATION POLICY

I. PURPOSE

The purpose of the Public Relations and Communications policy is to provide guidance to the Western Oklahoma Workforce Development Area (WOWDA) system to ensure effective and appropriate communication of the Western Oklahoma Workforce Development Board (WOWDB) local operations, activities, events, and notices regarding Workforce Innovation and Opportunities Act (WIOA) Title I programs. This policy establishes the Western Oklahoma Workforce Development Board (WOWDB) standards for communications. This policy is established in accordance with applicable State and Federal laws and regulations.

II. BACKGROUND

The WOWDB is expected to be the community's local expert in workforce development issues. To effectively communicate the vision of the workforce development system as promulgated by WIOA and its associated regulations the WOWDB must implement an effective public relations and communication plan of action. Workforce development services and activities are only valuable to the degree or extent that they are properly understood and trusted by those accessing the workforce development system.

Reputation and image are essential for the WOWDB. The development and implementation of an effective public relations and communication plan of action to strategic constituencies, including education and training stakeholders, system partners, employers, participants and contracted service providers is key to the quality of the work force development system.

All communication by WOWDB must abide by federal and state requirements, including IRS regulations prohibiting WOWDB from endorsing any political candidate. All parties must also abide by other applicable law, such as copyright and defamation laws, as well as the terms of service, terms of use, privacy policies, and other requirements of any communications platforms.

III. BABEL NOTICE: (29CFR 38.9(g)(3)): This document contains vital service information. To enable telephone conversation between people with speech or hearing loss and people without speech or hearing loss please call Oklahoma Relay at 711- (<http://www.oklahomarelay.com/711.html>) or TDD/TTY: 800-722-0353. If English is not your preferred language, please contact:

Western Oklahoma Workforce Development Board
Tara Goldman, One Stop Operator
Phone: 580-716-7276
400 E. Central, Ste. 103
Ponca City, OK 74601
Goldman.Tara@odle.com

Or, State Equal Opportunity Officer
Oklahoma Office of Workforce Development
Ferris Barger, State Equal Opportunity Officer
900 N Portland Avenue, BT 300
Oklahoma City, OK 73107
Office: 405.945.9184
TDD/TTY: 800.722.0353
Email: Ferris.barger@okstate.edu

IV. POLICY ON COMMENTS FROM THE PUBLIC AT WOWDB MEETINGS

The Western Oklahoma Workforce Development Board (WOWDB) desires to be open to the public and encourages communication in order to hear the viewpoints of citizens throughout the Western Workforce Area. The WOWDB considers the responsible presentation of these viewpoints vital to the efficient operations of the System and the WOWDB. System stakeholders, workforce partners, businesses, and other constituents are encouraged to participate in Workforce Area activities through the attendance of WOWDB Meetings so that they may become better acquainted with the operation and programs of the Western Oklahoma Area, and that the WOWDB may have an opportunity to hear the wishes and ideas of the public.

The WOWDB will have an agenda item labeled “Comments from the Public” on each Regular WOWDB Meeting Agenda that affords citizens the right to speak on any action item on the Agenda for that meeting. Matters not on the Agenda are not proper subjects for discussion. Members of the public shall not be recognized or allowed to be heard or participate at any other time during the Meeting or while the WOWDB is conducting its official business. The purpose of the WOWDB meetings is to carry on the business of the Western Oklahoma Workforce Development Board in an orderly and businesslike manner. Therefore, the WOWDB sets the following rules for public participation at WOWDB meetings:

- A. All meetings of the Board will be open to the public.
- B. The Board shall conduct its business pursuant to the Oklahoma Open Meeting Act. The meetings are not public hearings, but are meetings held in the public. Spontaneous discussion from the audience will not be permitted.
- C. As the purpose of the “Comments from the Public” agenda item is to hear the comments, concerns and opinions of patrons, WOWDB Members and administrative staff shall not respond to questions from the public. The Oklahoma Open Meeting Act prevents the discussion or action by the WOWDB on any item presented under the “Comments from the Public” Agenda topic.
- D. Information about items on the agenda should be obtained from the Workforce Board Executive Director.
- E. All visitors shall be asked to list their names on the meeting’s attendance/sign-in sheet.
- F. Pursuant to the Oklahoma Open Meeting Act, an item must appear on the posted agenda if discussion and action are to occur.

- G. "Comments from the Public" is not when Workforce System Partners or stakeholders should discuss reports or provide updates of projects. An agenda item will be clearly labeled for these types of reports if such reports are necessary.
- H. Advanced requests to address the WOWDB is not required but will be accepted. Advance requests for permission to address the WOWDB must be submitted to the WOWDB Executive Director in writing no later than five days (not including weekends or holidays) preceding a meeting of the WOWDB. The request shall state the name of the individual or group submitting the request, a telephone number and mailing address, the purpose of the request and topic to be presented.
- I. The WOWDB Executive Director shall confer with the WOWDB Chair concerning whether the requested item should be placed on an agenda and, if so, the appropriate meeting for such discussion. The WOWDB Executive Director will respond to all written requests that an item be placed on an agenda.
- J. At the meeting, the WOWDB Chair shall recognize speakers, maintain proper order, and adhere to time limits established by this policy:
 - 1. During the agenda item for "Comments from the Public", if there is allowable time, a limit of five (5) minutes is established for individuals addressing the WOWDB.
 - 2. Groups or organizations shall designate one spokesperson to address the WOWDB.
 - 3. The WOWDB reserves the right to limit repetitive comments.
 - 4. All presentations pursuant to this policy shall be directed to the Chair of the WOWDB. No questions or comments shall be directed to WOWDB members except upon approval of the Chair.
 - 5. Members of the WOWDB and the Board Executive Director may ask questions of any person who addresses the WOWDB.
- K. This policy does not create a right to address the WOWDB. The WOWDB reserves complete control over its agenda and the conduct of its meetings.

V. FIRST AMMENDMENT AUDIT GUIDELINES

Certain citizen groups have begun conducting "First Amendment Audits" in public buildings. There has recently been video of such an "audit" at the offices of an Oklahoma state agency or public buildings that was posted on the Internet. The audit consists of a member of the citizens group walking into the public building and taking video with his or her cell phone or small camera. If an employee engages with the auditor to ask who the person is and what he or she is doing, or if the employee responds to questions of the auditor, the exchange is recorded and posted on the Internet. This guideline document is to inform employees of the rights members of the public have in public office buildings, how the WOWDB would like employees to respond when confronted by a "First Amendment Audit" and the duty of employees to enforce rules in areas of restricted access.

5.1 Interviewing and Recording in American Job Centers or other related public office Buildings:

- A. Individuals conducting First Amendment audits have the right to be present and record activity in areas of buildings occupied by employees that are traditionally open to the public during normal business hours.
- B. Examples of areas traditionally open to the public are:
 - a. All areas that are not access-controlled areas
 - b. Reception areas
 - c. Hallways and lobbies open to public access
 - d. Public meeting rooms except when used for private, confidential interviews, staff meetings or for Executive Sessions of a public body
- C. Individuals conducting First Amendment audits have the right to ask questions. The right to ask questions does not impose a duty on employees to respond to the questions asked. Employees should not feel pressured to answer any question.
 - 1. If an employee does respond to the questions or decides to participate in the interview, such employee remains bound by confidentiality and the Oklahoma Ethics Rules.
 - 2. Ethics Rule 2.9 requires state officers or employees who engage in political activities to do so on their own time. Employees should be cautioned to avoid using the First Amendment audit as a forum to express personal political opinions or agendas.
 - 3. If an employee whose duty station is within an area open to the general public and does not feel comfortable being present during a First Amendment audit, the employee's supervisor may temporarily reassign the employee to another location during the audit.
 - 4. Employees should always be kind and courteous to members of the public entering the offices. Employees should conduct themselves in a manner that will reflect positively on their agency and the Western Oklahoma Workforce Development Area.
 - 5. If a person conducting a First Amendment Audit attempts to disrupt the business of the agency/office or attempts to disturb other members of the public in the office, the person conducting the audit can be asked to leave. If anyone threatens violence or commits a violent act, the police should be called.

5.2 First Amendment Audits in Public Meetings:

- A. Individuals conducting First Amendment audits have the right to be present at all public meetings held in accordance with the Oklahoma Open Meetings Act.
- B. Individuals may record public meetings with audio and visual equipment.
- C. A public body is not required under the Oklahoma Open Meeting Act or the First Amendment of the U.S. Constitution to provide individuals an opportunity to express views or interview members of the public body. Oklahoma Attorney General Opinion 02-26.
- D. A public body may voluntarily choose to allow public comment. If the agenda for the public meeting states that the comments must be limited to items on the agenda, any comments or questions not on topic would be outside the scope of the agenda and in violation of the Oklahoma Open Meeting Act. A public body choosing to allow

public comment has the right under the Oklahoma Open Meeting Act and the First Amendment of the U.S. Constitution to place reasonable "time, place and manner" restrictions on public comments, such as limiting comments to 5 minutes per person, or requiring speakers to sign up prior to the start of the meeting. Please see "Attachment A", "Policy on "Comments from the Public" at WOWDB Meetings".

5.3 Encountering or becoming aware of a First Amendment audit at an American Job Center or other public office buildings:

- A. Notify your Division Director/Supervisor immediately
- B. Remain calm and composed
- C. Be kind and courteous
- D. Do not engage in arguments or attempt to challenge the person conducting the audit.
- E. Do not allow the person conducting the audit to venture into a restricted access area. Be firm, but not combative. If instructions regarding restricted access areas are not followed, call the police.
- F. If anyone threatens violence or commits a violent act, the police should be called.

After the "First Amendment audit" is over and the person has left the building, report this activity in a detailed email to the WOWDA One-Stop Operator, Yolanda Creswell, creswell.yolanda@odle.com and CC your WOWDB Executive Director, Christi Porter, christipor@wowdb.org.

VI. AFTER BUSINESS HOURS ACCOMMODATION FOR ONE-STOP CENTERS

Generally speaking, most services to clients/customers are provided during normal working business hours: Monday – Friday, 8am-5pm. In order to provide maximum access to partner program services at times that meet participant needs, some services may be offered at other times to accommodate the schedules of working individuals. If these services cannot be administered utilizing other means, such as technology, and requires staff to work after business hours, that staff is to contact their supervisor and follow their agency's procedures for working after hours. The goal is to offer access to services by a staff member or an appropriate direct linkage while ensuring the safety and welfare of workers and without creating an undue hardship on the operation of the center. In the event an accommodation of hours cannot be made for the customer/client, the center manager/lead can notify the one-stop operator.

VIII. EQUAL OPPORTUNITY AND NONDISCRIMINATION STATEMENT:

All Recipients, and Sub recipients/Sub grantees must comply with WIOA's Equal Opportunity and Nondiscrimination provisions which prohibit discrimination on the basis of race, color, religion, sex (including pregnancy, childbirth, and related medical conditions, transgender status, and gender identity), national origin (including limited English proficiency), age, disability, political affiliation or belief, or, for beneficiaries, applicants, and participants only, on the basis of citizenship status or participation in a WIOA Title-I financially assisted program or activity.

IX. POLICY ADDITIONS AND CLARIFICATIONS:

The WOWDB Executive Director is authorized to issue additional instructions, guidance, approvals and/or forms to further implement the requirements of this policy, without making substantive change to the policy, except in situations where new or updated state and federal guidance is issued.