

December 15, 2020

Board of Neighborhood Commissioners Los Angeles City Hall
200 N Spring St #2005
Los Angeles, CA 90012

Re: Comments on the Digital Media Policy

Dear Commissioners:

We at the Palms Neighborhood Council appreciate the effort to set some parameters around proper use of social media. Best practices for administration of websites and social media accounts as well as special responsibilities of City entities are not always obvious, so the Palms NC appreciates guidance.

The Palms Neighborhood Council has an active social media presence. Our social media account is used for “promotion of neighborhood council membership and attendance at meetings and promotion of approved and authorized neighborhood council events,” and much more. We use it for community engagement with our #PalmsPride, education such as how to safely vote during a pandemic, and amplifying the voices of our elected officials. We have separate email lists for different committees for targeted communications. To communicate with our stakeholder volunteers, we use a Facebook group. One use that doesn’t meet the definition a “proper use” of social media quoted earlier in this paragraph from Sections 1 and 8.1 in the draft Policy is to engage the community on changes they want to see in the new Community Plan. Engagement is key. We want to engage by being engaging.

In general, we find two major issues with this policy. It is informed by too narrow a view of the Neighborhood Councils' chartered purpose and it is too cumbersome to implement, taking valuable time and bandwidth away from the ability to implement Councils' chartered purpose. Neighborhood Councils are run by volunteers and are meant to operate with a degree of autonomy so we would like to register an objection to the presentation of this policy as a whole. We believe that behavioral issues should be addressed in the Code of Conduct and Brown Act issues should be addressed via training. These things shouldn't be the focus of a Digital Media Policy. Additionally, if a digital media policy is approved, we recommend a yearly review of said policy, including Neighborhood Councils in the process.

We find this document to be vague in some parts and overly specific in others. Our areas of concern include the following:

Limited View of NC Purpose

The policy states that “Proper use for a neighborhood council's website, social media, or newsletters/reports is the promotion of neighborhood council membership and attendance at meetings and promotion of approved and authorized neighborhood council events.”

The actual chartered purpose of Neighborhood Councils is, “to promote more citizen participation in government and make government more responsive to local needs” and further to “monitor the delivery of City services.” In our view, any communication that advances these goals or contributes to fulfillment of these purposes is proper use of digital media or any other type of media.

Overreach

Enforcement of these policies are delegated to the Department of Neighborhood Empowerment and the City Clerk who may, at what appears to be their discretion, suspend Neighborhood Councils' digital media accounts. The mechanism of this suspension would necessarily involve control of the accounts that the Department will have due to the requirement of handing over passwords and usernames for all accounts to them. This step is said to be “primarily for security purposes” and to “assist neighborhood councils in regaining access to their accounts,” but this would also be the only way a suspension could be implemented. We do not believe DONE and the City Clerk should be able to suspend Neighborhood Councils' digital media accounts at their discretion or have access to neighborhood council account information. We believe that Neighborhood Councils can maintain account security without relinquishing NC autonomy.

The policy dictates that no Neighborhood Council may include endorsement of private entities, including non-profit organizations. We disagree with this policy. Instead, we believe this should be consistent with the existing endorsement policies for other City entities.

Extra Administrative and Board Work

The Palms NC finds many parts of this policy to involve extra, unnecessary work, which is particularly problematic since the Neighborhood Council is made up of volunteers and administration already takes enough volunteer and meeting time.

While posting of timely and accurate information is always optimal, this policy needlessly legislates that there be a “timely and accurate content review process” conducted by the Neighborhood Council. Codifying this is unnecessary and seems to serve as preparation for yet another extensive paperwork process that must be taken on by the volunteers that make up the Neighborhood Council and that would also then waste valuable meeting time.

Finally, the requirement that “all Digital Communications shall originate from the neighborhood council, acting through its board” seems to imply that the Board would need to approve all social

media posts and newsletter and website content. If this were the case, the NC would need to decide whether to substantially detract from board effectiveness or from outreach efforts. Further, the prohibition against committees having digital media accounts is unnecessary. Such accounts might well advance the Neighborhood Council's chartered purpose.

Policies That Are Contrary to a Good Outreach Strategy

We disagree with Section 6.4 regarding multiple NC accounts. Social media is a domain that requires agility. We believe that NCs should be able to decide for themselves how many accounts will best serve their outreach purposes.

The compulsion to link back to the NC website and its agendas is also contrary to good strategy. Brevity is very important in certain social media communications. While these links are often an obvious and integral part of the communication, they are not always, and trying to fit them in every time would destroy the communications. City Council members aren't compelled to link back to council agendas and meetings. Why should Neighborhood Councils be?

The requirement that "All neighborhood council Digital Communication must ... display neighborhood council contact information" likewise is absurd. A Tiktok video is normally less than 30 seconds. A tweet is a small number of characters. Digital media communications come from accounts and it's the account itself that is the contact information. If somebody wants to contact the Council, any web search will lead to the ability to do so. To burden all communications with this responsibility is unnecessary.

Conclusion

The Palms NC would support the requirement that we have a digital media policy. This would be an integral part of our standing rules. Procedures and policies, however, should be informed by applicable law and dictated by each Council. **We ask that Neighborhood Councils be an integral part in the development of a policy that works for all of us.**

WHEREAS the proposed Digital Media Policy is a direct overreach in power and scope of limiting the ability of Neighborhood Councils to effectively communicate with their constituency

BE IT RESOLVED the Palms NC rejects the proposed Digital Media Policy.

Best regards,

Palms Neighborhood Council

CC:

Raquel Beltran, DONE General Manager