

Public Communication Policy

Policy Title:	Public Communications Policy
Effective Date:	April 5, 2018
Purpose:	To comply with the reporting requirements of Washington State RCW 70.290 and to ensure that any external communications or political activity by the Washington Vaccine Association or its directors, officers or staff are (i) authorized, (ii) accurately reflect the position of the Association, and (iii) are consistent with applicable law.

This Public Communications Policy (the “Policy”) will guide the Washington Vaccine Association (WVA) Board of Directors (collectively the “Board” and each member, individually, a “Director”) and the WVA Executive Director (“ED”), along with their representatives, agents and employees, (each an “WVA Representative”) in communications on behalf of the “WVA”).

A. Definitions:

For purposes of this policy,

1. “Communications Position” means communications entirely consistent with the Board’s determination that WVA’s purposes are furthered by activities which support the continuation of the Washington universal vaccine purchase program, which program is designed to provide Washington children access to vaccines recommended by the Washington State Department of Health and Human Services as defined in RCW 70.290.010 (10).
2. “Political activity” means any activity which is intended to or is likely to have the effect of:
 - a. influencing legislation or regulation;
 - b. advocating for the success or failure of a political party, candidate or partisan political group; or
 - c. endorsing or otherwise supporting a political party, candidate or partisan political group.
3. “Public advocacy activity” means any activity which is intended to or is likely to have the effect of:
 - a. presenting to members of the public and/or public officials a particular point of view or perspective on a matter of social policy or preference; or
 - b. advocating for certain action or inaction by members of the public and/or public officials regarding a matter of social policy or preference.

B. Required Reports:

1. WVA will timely submit all reports required by Washington State RCW 70.290 and any other applicable law or regulation. These include the following (collectively the “Annual Reports”):
 - a. On an annual basis, beginning no later than November 1, 2010 and by November 1st of each year thereafter, establish the estimated amount of the assessment [RCW70.290.030 (5)(j)].
 - b. Notify, in writing, each health carrier and third-party administrator of the health carrier’s or third -party administrator’s estimated total assessment by November 15th of each year [RCW70.290.030 (5)(k)].
2. Report Preparation Procedures:
 - a. Annual Reports shall be consistent with the Communication Position.
 - b. The ED will prepare the initial draft of each Annual Report and provide the opportunity for review and comment by the Department of Health.
 - c. The ED will next disseminate a draft of each Annual Report to the Board for individual comments by email or telephone. The ED will synthesize Director comments and disseminate a revised draft to the Board.
 - d. At the request of any Director directed to the ED or Board Chair, the Board will discuss the revised Annual Report at its next regular meeting or, if the filing deadline requires, at a special meeting called by the Board Chair.
 - e. Consistent with any final Board direction, the WVA Executive Director will finalize and timely file each Annual Report.
3. Unless otherwise directed by the Board, the ED will post all final Annual Reports on the WVA website.
4. WVA will produce one additional written communication piece per year in consultation with the DOH to be sent to stakeholders

C. Public Statements and Communications:

1. When acting in his or her official WVA capacity no WVA Representative may make any oral or written communication contrary to any Communications Position.
2. Requests for WVA public statements should be directed to the Board Chair. The Board Chair may communicate on behalf of WVA or request the ED or other Director to do so. All communications made on behalf of WVA must be accurate, consistent with its purposes and the Communication Position, and in fulfillment of the fiduciary duty of loyalty to WVA.
3. Additionally, the ED is authorized and directed to respond to factual inquiries about WVA, and to communicate as needed to collect assessments.

D. Political Activity:

1. Political Campaigns

- a. Neither WVA nor any WVA Representative, acting in its official capacity for WVA, may participate, directly or indirectly, in any activity directed at the success or failure of a political party, a partisan political candidate, or a partisan political group.
- b. Neither WVA nor any WVA Representative, acting in its official capacity for WVA, may endorse a candidate, contribute WVA funds to a candidate's campaign, or use WVA facilities, letterhead, web sites or other social media to conduct any fundraising or other activities in support of a candidate.

2. Public Policy Positions:

- a. WVA may take an official position on public policy issues germane to its mission and operations, but only in accordance with the following procedures:
 - i. The Board must approve the content and nature of the policy position, after first determining that the issue is pertinent to WVA's mission and/or operations.
 - ii. All communication of the WVA policy position will be conducted solely by WVA representatives authorized by, and only through means approved in advance by, the Board or a duly-constituted Board legislative committee.
 - iii. WVA policy positions will not: (i) identify one or more candidates for political office; (ii) approve or disapprove of any candidate's position or actions with respect to the policy issue; (iii) reference voting or an upcoming election; or (iv) be delivered in close proximity in time to an election in which the policy issue is germane.
- b. No WVA Representative may assert any policy position on behalf of WVA, or give the appearance of asserting any policy position on behalf of WVA, except in strict accordance with the procedures described above and in a manner consistent with WVA's approved policy positions.

3. Political Activity and Public Advocacy as Private Citizen

- a. Any WVA Representative may conduct or participate in political or public advocacy activities in his or her individual capacity as a private citizen.
- b. Each WVA Representative has a fiduciary duty of loyalty to WVA when acting in an official capacity. When conducting political or public advocacy activity as a private citizen, each WVA Representative must take the following steps to ensure that he or she is not using his or her official WVA capacity to further personal political or social views or goals, or creating the possibility that his or her political activity as a private citizen may be misconstrued as the activity of, or an expression of support by, WVA:
 - i. When conducting political or public advocacy activity as a private

citizen, each WVA Representative must utilize personal letterhead, social media, telephone lines, email, and facilities and conduct such political activity outside of the WVA Representative's official duties for WVA.

- ii. An WVA Representative may note his or her title or official capacity with WVA solely for identification purposes. Whenever such capacity is noted (i) in connection with any private political or public advocacy activity, whether verbal, written or electronic (including email, web sites, blogs, online commentary, Facebook, Twitter or other social media), or (ii) in a manner or under circumstances which may create an inference that such private political or public advocacy activity is conducted on behalf of, or with the support of WVA, then the WVA Representative must state expressly in each such instance that he or she is acting in an individual capacity, and in no way on behalf of WVA.
- iii. Except in strict accordance with Paragraph D.2.a above, no WVA Representative has authority to conduct any political or public advocacy activity on behalf of WVA, or to create the appearance that he or she is acting on WVA's behalf or with WVA's support. Each WVA Representative will take all steps necessary to clarify the personal nature of any political or public advocacy activity conducted as a private citizen.

E. Enforcement, Review and Revision:

This Policy will be enforced by the Board at any regular or special meeting. The Board may consider all courses of action, including but not limited to education and training and possible removal from the Board in accordance with provisions in the WVA bylaws or, in the case of staff, termination.

This Policy may be updated from time to time by the Board.

DATE ADOPTED: April 5, 2018.

LAST REVISED: _____