

October 5, 2017

VIA EMAIL

Micaiah Titus Ragins
Compliance Coordinator
Washington State Public Disclosure Commission
711 Capitol Way, Room 206
Olympia, WA 98504-0908

*Re: Complaint filed by Eva Bennett regarding Jefferson Healthcare
(PDC Complaint No. 24651)*

Dear Mr. Ragins:

We serve as counsel to Jefferson County Public Hospital District No. 2 (the "District"). This letter responds to the above-referenced Complaint filed by Eva Bennett on August 15, 2017, alleging District employees have improperly used public facilities for campaign activities related to the November 2017 election for District commissioner. The District offers the following discussion to assist the Public Disclosure Commission with its preliminary evaluation of this matter.

The District operates nine primary care, internal medicine, and urgent care clinics throughout Jefferson County. The District's hospital is a 25-bed critical access care hospital, and the District's primary care clinics provide pediatrics, family medicine, obstetrics, women's health, internal medicine, and urgent care. The District employs 700 people throughout its fully integrated health care system.

After it was notified of the Complaint on September 5, 2017, the District conducted an internal investigation into Ms. Bennett's allegations. As discussed in greater detail below, a number of the Complaint's allegations are unfounded. As to those instances where the District believes its employees engaged in improper conduct, the District outlines below the steps the District will be taking to ensure compliance with the Fair Campaign Practices Act, Chapter 42.17A RCW ("FCPA"). In light of the foregoing, the District believes a formal investigation into this Complaint is unwarranted and respectfully requests that Commission staff dismiss the Complaint.

1. Complaint and Summary

Ms. Bennett's Complaint alleges that District employees have engaged in political activities during work hours using District equipment in support of Bruce McComas, a candidate for hospital district commissioner in the November 2017 election. Ms. Bennett also alleges that one employee wore a McComas campaign t-shirt during work hours, and that employees have

been pressured to support the McComas campaign and feel at risk of losing their jobs if they fail to do so. Ms. Bennett further alleges that she, as a patient, was also solicited for support, and felt that the quality of care she received from some District employees might have been threatened when she did not react positively.

The FCPA prohibits the use of public facilities for the purpose of assisting a campaign for election. RCW 42.17A.555 provides:

No elective official nor any employee of his or her office nor any person appointed to or employed by any public office or agency may use or authorize the use of any of the facilities of a public office or agency, directly or indirectly, for the purpose of assisting a campaign for election of any person to any office or for the promotion of or opposition to any ballot proposition. Facilities of a public office or agency include, but are not limited to, use of stationery, postage, machines, and equipment, use of employees of the office or agency during working hours, vehicles, office space, publications of the office or agency, and clientele lists of persons served by the office or agency.

It is clear from the District's internal investigation that some of its employees are concerned about the upcoming election. But the District found no evidence that employees have been threatened or coerced into campaign activity. The District also found no evidence that any employee wore campaign buttons or t-shirts while they were working at the hospital. And, the District found no evidence that hospital staff solicited patients to support Mr. McComas.

However, the District did find evidence that some employees used public facilities inappropriately, by distributing literature, using agency phones, and circulating endorsement forms. Employees have been repeatedly advised by the District that such activity may only occur on employees' own time without the use of agency equipment. But, in light of the noncompliance with its directives uncovered in the course of this investigation, the District will issue additional directives to employees and training on this topic, is in the process of evaluating potential corrective action as to noncompliant employees, and is actively pursuing revisions to District policies to provide employees additional guidance.

2. Discussion

2.1 There is no evidence of coercion to participate in political activity or threats to employee jobs.

Ms. Bennett's Complaint alleges that several employees informed her that they were approached during work hours and pressured to "endorse, support the campaign of, and/or attend campaign events in support of" commissioner candidate Bruce McComas, and that employees are concerned about losing their jobs.

The PDC's guidelines provide that employees may not be "subjected to coercion, pressure, or undue influence to participate in political activity or to take a particular position." *Guidelines for Local Government Agencies in Election Campaigns (Public Disclosure Law Re: Use of Public Facilities in Campaigns)*, PDC Interpretation No. 04-02 (May 22, 2013).

The District found no support for these allegations of coercion or pressuring employees. Some employees interviewed were clearly concerned about the outcome of the election, and some believe the outcome could have consequences for their own jobs. But the District found no evidence that employees feared they might lose their jobs based on whether or not they campaigned for either candidate.¹

2.2 There is no evidence supporting Ms. Bennett's supplemental submission.

In a supplemental submission dated September 14, 2017, Ms. Bennett alleged that Nancy Biery "observed Ms. Jeinell Harper, RN, wearing a Bruce McComas campaign t-shirt in the hospital, during the work day, while treating patients."

Several days later, on September 18, Ms. Bennett sent an email to District Risk Manager Rena Sleight stating, "Please withdraw my addition to my PDC complaint in which I stated that Nancy Biery observed Ms. Harper in a McComas t-shirt. I was wrong. I'm sorry. I was wrong." Exhibit A. In a subsequent phone call with Ms. Sleight, Ms. Biery confirmed that Ms. Harper was not wearing a McComas t-shirt.

The District found no evidence that Ms. Harper or any of her staff wore campaign buttons or t-shirts on campus. The District's Personal Appearance Policy prohibits employees from wearing "pins, buttons, cartoons, product advertisements [and] campaign buttons" while working at the hospital. Exhibit B. Ms. Harper has a McComas campaign sign on her car, but parks on the street and not on the District campus. *See* WAC 390-05-271 (statute "does not restrict the right of any individual to express his or her own personal views concerning, supporting, or opposing any candidate or ballot proposition, if such expression does not involve a use of the facilities of a public office or agency.").

2.3 There is no evidence that employees solicited patients to support McComas.

Ms. Bennett also alleges that while she was a patient she was approached by "hospital staff" to solicit her support for McComas. She contends that when she did not react positively, she "felt the quality of the care [she] received might be threatened."

The District interviewed the two employees who interacted with Ms. Bennett in August 2017 and found no support for these allegations. Neither employee solicited Ms. Bennett's support for Mr. McComas, and both employees treated Ms. Bennett in a professional manner.

2.4 Allegations regarding other activity during work hours using hospital equipment.

Ms. Bennett alleges that employees have engaged in campaign activity during work hours, and have made telephone calls on District phones. While a majority of employees are

¹ District Risk Manager Rena Sleight interviewed Nancy Biery, campaign manager for Cheri Van Hoover, as well as Ms. Van Hoover, but neither provided details of District employees engaging in coercion. While both mentioned rumors circulating among hospital staff, these rumors do not relate to coercion of employees or any improper use of public facilities.

aware of and abide by the guidelines communicated to them, the District agrees that a few employees have engaged in inappropriate activity, despite the District's direction to not do so. These violations may have been inadvertent, or based on employees' misunderstanding of the PDC guidelines. However, the District recognizes that the employees nonetheless violated the PDC guidelines and is not attempting to minimize such violations.

2.4.1 The District has repeatedly reminded employees not to use public facilities for campaign activity.

The PDC guidelines provide the following examples of permitted activities for agency employees:

May inform staff during non-work hours of opportunities to participate in campaign activities.

May engage in campaign activities on their own time, during non-work hours and without using public resources. . . .

May, during non-work hours, make available campaign materials to employees in lunchrooms and break rooms that are used only by staff or other authorized individuals.

Guidelines for Local Government Agencies in Election Campaigns (Public Disclosure Law Re: Use of Public Facilities in Campaigns), PDC Interpretation No. 04-02 (May 22, 2013).

Consistent with these guidelines, the District has repeatedly reminded employees that they may not use public facilities or equipment for campaign purposes. In an email dated July 3, 2017, CEO Mike Glenn wrote to all District employees:

As we enter into another election season, some of you have asked if it was OK for a hospital employee to campaign for a commissioner candidate. The answer is **yes . . . but.**

Yes, you can participate in the campaign of a commissioner candidate. Your right to engage in political activism or expression, most often defined by participating in a political campaign, is protected by state statute. **But**, employees are **not** protected by this statute during work time, and you **may not** use work time or hospital facilities (offices, copy machines, stationary, telephones, etc) to assist a campaign for any person's election to office.

This means district employees can campaign for a candidate but only on their **own time, using their own supplies and equipment.**

Let me know if you have a specific question about any of this, or if you would like to review the legal documents supporting my email.

Exhibit C (emphasis in original).

In a subsequent email dated Monday, August 28, 2017, Mr. Glenn again reminded employees of these rules, and specifically informed employees, that they “**cannot talk to a patient being treated at Jefferson Healthcare about a particular candidate.**” Exhibit D (emphasis in original). And, Mr. Glenn emailed employees again on September 22, 2017, with additional guidance, providing employees with a copy of the PDC guidelines. Exhibit E.

2.4.2 While most employees complied with the District’s directives, some employees failed to do so.

The findings of the District’s investigation are summarized below. The District believes most of its employees have appropriately heeded its directives. However, based on its investigation, the District also believes some employees have used public facilities inappropriately.

- J.H.² is a registered nurse who works in a managerial role at a District clinic. While she volunteers with the McComas campaign, has publicly endorsed him, and wrote a letter to the editor supporting Mr. McComas, none of these activities involved the use of public facilities. At the end of June, L.R. is an RN lead in the same clinic and reports to J.H. J.H. and L.R. were on a break from their duties, signing up employees for the Relay for Life event, and asked to speak with J.A., an employee in the Women’s Health Clinic. J.A. was not working with a patient, and the meeting occurred toward the end of the day. The employees discussed the election. J.A. recalls that J.H. asked J.A. to endorse Mr. McComas, and J.A. declined stating she did not know enough about the candidate. J.H. denies this occurred. After the primary, J.H. contacted J.A. on a District phone and asked if she would consider endorsing Mr. McComas. Mr. McComas later left a message for J.A. at work on a District phone. J.A. did return his phone call at work on a District phone.
- J.H. and L.R. also met with a management employee, B.M., during work hours. After asking B.M. to fill a spot on the Relay for Life team, J.H. and L.R. asked B.M. to endorse Mr. McComas. L.R. recalls B.M. said she would need to know more about Mr. McComas. B.M. does not recall the content of the conversation, but remembers finding literature about Mr. McComas on her desk.
- L.R. approached J.L., a patient advocate, in a hospital stairwell to discuss the election. J.L. believes this occurred before the first of the CEO’s emails on public facility use. J.L. said she felt uncomfortable and asked L.R. to continue the conversation outside the hospital. The two stepped outside and spoke on the sidewalk.
- V.T., a secretary, asked L.R. for information on Mr. McComas during a work day. The two stepped outside to discuss the candidate in order to comply with the District’s directives.

² Should the Commission wish to review the full names of the above-referenced employees, the District will promptly provide that information to the Commission.

- K.G., a department director, and L.R. met in the hospital stairway to sign an endorsement petition. This was a planned meeting discussed between the two employees over the weekend. The two met prior to starting work in the morning.
- L.R. called a District phone in the pharmacy to speak to E.B. and invite her to an event for Mr. McComas at L.R.'s home on the weekend. E.B. felt the call was inappropriate and that L.R. should have called E.B.'s personal cell phone. L.R. did not recall this conversation but thought it may have occurred.
- J.H. asked S.G., another nurse, to bring campaign documents to a nurse working in the Intensive Care Unit. S.G. believes that this occurred after her own shift ended. When S.G. arrived with the pamphlets, the ICU nurse could not go on break. C.W., a charge nurse, saw S.G. walk up to the nurse's station, and ask if employees could go on a "break" in order to sign an endorsement letter a few weeks before the primary. S.G. made this request in a joking way indicating she did not take the requirement to be on break seriously. C.W. was annoyed because the employees were not on break, and she believed this was contrary to the email from the CEO on campaign activities in the workplace. After a few employees signed the endorsement letter, S.G. left the campaign literature in the employee lounge. S.G. acknowledged in her interview that she knew she needed to be on break to engage in campaign activities.
- J.H. called another employee approximately four to six weeks ago at work using a District phone and asked the employee to take a campaign picture with Mr. McComas. The employee declined. J.H. denied that this phone call occurred.
- K.S., a physician and District contractor, sent an email regarding the importance of the election and a potential endorsement to other medical staff on May 24, 2017. This email does not mention a specific candidate but talks about gathering consensus for an endorsement. This email was sent to several other employees at District email addresses. In a follow-up email, K.S. asked the copied employees to provide their private email addresses. K.S. and members of the Medical Executive Committee also authored a letter outlining the medical staff's expectations for a board member. This letter does not endorse a particular candidate. K.S. also authored an article supporting Mr. McComas and met with the medical executive team regarding the election, but did so without the use of public facilities.

2.5 Campaign promotional materials.

Following receipt of Ms. Bennett's complaint, the District became aware that several employees had appeared in campaign materials in support of Mr. McComas.

The PDC guidelines provide: "Agency employees shall not use or wear their agency-issued, agency-purchased, agency-owned or agency-replaced uniforms to assist a campaign or to support or oppose a ballot proposition." *Guidelines for Local Government Agencies in Election*

Campaigns (Public Disclosure Law Re: Use of Public Facilities in Campaigns), PDC Interpretation No. 04-02 (May 22, 2013).

In the campaign materials the District has reviewed, one employee wore a hospital-issued name tag; one employee wore a hospital-issued labcoat; and one commissioner is shown with a District vehicle. Another employee appeared with a labcoat he personally purchased, consistent with the PDC guidelines on permitted activities.

After learning of the issue, the District sent out an additional reminder to employees that using agency equipment in support of a campaign was a violation of the PDC guidelines and state law. That email, sent by CEO Mike Glenn to all employees on September 22, 2017, stated:

As many of you may be aware, voters participating in the upcoming November 7, 2017 election will select one of two candidates for a position on the Board of Commissioners of the Jefferson County Public Hospital District No. 2.

Please remember that, under Washington State law, public hospital district facilities may not be used to assist the campaign of any candidate for elected office. Any election advocacy must be done on your own time and without District resources. This means that you may not use your work hours or District computers, printers, email or other District facilities for any election advocacy.

The state agency charged with enforcing these campaign rules has specifically stated:

- “Agency employees shall not use or wear their agency-issued, agency-purchased, agency-owned or agency-replaced uniforms to assist a campaign or to support or oppose a ballot proposition.”
- “This same prohibition applies to related equipment including but not limited to: firearms; badges; nametags; holsters; handcuffs; jackets; belts; vests; shoes; agency patches, logos, insignias, emblems; and radios.”
- “Prohibited uses include but are not limited to using or wearing those uniforms at campaign functions or in political advertisements such as TV commercials.”

In addition, as we advised all employees on July 3, 2017 and again on August 28, 2017, District employees may not talk to a patient being treated at Jefferson Healthcare about a particular candidate. Any campaigning for a particular candidate may only be done on your own time, using your own supplies and equipment. Failure to comply with these principles is not only a violation of Jefferson Healthcare’s expectations of its employees, but a violation of state law.

Attached are the Washington Public Disclosure Commission Guidelines for Local Government Agencies in Election Campaigns. Please review the table of

examples of activities which are permitted and those which are prohibited related to specific district staff and facilities, starting on page 6.

Exhibit E.

3. Conclusion

The District offers this response to Ms. Bennett's allegations. Ms. Bennett's allegations are largely without factual support, but in light of the issues uncovered by the District in the course its investigation, the District is evaluating appropriate coaching, education, and if necessary, corrective action for noncompliant employees, and is actively pursuing revisions to District policies to provide employees additional guidance. The District will also issue additional employee communications providing further guidance and evaluate conducting an all-employee training.

In light of the foregoing response, the District does not believe a formal investigation by the Commission into Ms. Bennett's allegations is warranted. The District respectfully requests that Commission staff dismiss this Complaint.

Finally, the District notes that it has no record of being subject to prior Public Disclosure Commission investigations. The District takes this Complaint seriously and will provide its fullest assistance to the Commission. If you or your staff have any questions, need any additional information, or would like to follow up with anyone at the District, please advise. We will promptly make whatever arrangements are necessary to facilitate the Commission's work.

Very truly yours,

Foster Pepper PLLC



P. Stephen DiJulio

cc: Jefferson Healthcare Board of Commissioners
CEO Mike Glenn
Rena Sleight

EXHIBIT A

From: [Eva Raczkowski Bennett](#)
To: [Sleight, Rena](#); [Eva Raczkowski Bennett](#)
Subject: Please withdraw my addition to my PDC complaint
Date: Monday, September 18, 2017 1:42:36 PM

Dear Ms Sleight:

Please withdraw my addition to my PDC complaint in which I stated that Nancy Biery observed Ms Harper in a McComas t-shirt. I was wrong. That is not what she observed. I'm sorry. I was wrong.

Thank you.

Eva R Bennett

EXHIBIT B



Origination: 04/2014
Last Approved: 09/2017
Last Revised: 09/2017
Next Review: 09/2018
Owner: Caitlin Harrison: Director /
Business Partner
Policy Area: Human Resources Policies
References:

Personal Appearance

PURPOSE:

Jefferson Healthcare ("JH") employees are required to present a clean, neat appearance and dress according to the requirements of their position or unit/department standards. Employees have the responsibility to comply with the unit/department's dress code, presenting a neat and professional image appropriate for our work environment.

OPERATIONAL GUIDELINES:

1. Employees are required to visibly wear a JH official identification badge at all times while on JH property. Badge lanyards are acceptable providing they contain a breakaway clasp for safety and do not interfere with patient care. Designated clinical staff must also display the additional provided badge attachment that identifies their discipline if provided to the employee by Human Resources. Employees may not alter their badge in any way or add attachments. Pins, personal buttons, cartoons, political or advertising on the badge or lanyard are not acceptable. Pins issued by JH (eg., Jefferson University, service awards, buttons and Employee Recognition) are allowed but may not interfere with the employee's name or picture.
2. Employees are expected to be aware and conscientious of their personal hygiene, neatness of attire and cleanliness of apparel. Clothes will be in good repair, unwrinkled, and clean. Hair must be clean and neatly trimmed/styled and be contained in a manner so that it does not come into contact with patients or visitors or interfere with the employee's ability to perform assigned tasks. Dietary employees shall wear hair nets or designated headgear at all times while on duty.
3. Scented lotion, oils or perfumes are not permitted. Odors considered to be offensive such as cigarette or cigar smoke, body odor, etc., are not permitted.
4. Pins, personal buttons, cartoons, product advertisements, campaign buttons or other items may not be worn.
5. Clothing, jewelry, shoes, and accessories or anything else that may potentially interfere with the delivery of treatment, patient well being or endanger the employee or patients is inappropriate. Hats of any kind, other than those issued/designated by JH are not acceptable. In clinical areas, hand jewelry should be minimized to allow safe hand washing and proper application of gloves. Jewelry must be of reasonable shape and size and present a professional image, as determined by JH.
6. Hosiery and/or socks are required while working in patient care areas.

7. Certain types of appearance and/or attire are ordinarily considered inappropriate and unacceptable in all areas of Jefferson Healthcare. These include, but are not limited to:
 - Nontraditional hair, i.e. spikes, mohawks and/or nontraditional colors
 - Sweatpants, sweatshirts, workout attire, jeans, shorts, cutoffs, beach or yard work attire, men's sleeveless shirts
 - Clothing with logos/sport logos of any kind. T-Shirts with or without a logo (exception: T-shirts or polo style shirts with JH logo are acceptable)
 - Tube tops, tank tops, halter tops, camisole tops, sundresses, bare midriff and see through clothing. Ladies' sleeveless shirts must be three finger widths in length from each side of the shoulder cap. Skirts must be no shorter than 2-3" above the knee. Formfitting, low cut neck necklines or revealing clothing of any kind, or other types of clothing that do not present a businesslike appearance, as determined by JH
 - Visible piercings other than small nose studs or earrings are not permitted. Concealing piercings with Band-Aids is not permitted
 - Visible tattoos that are flagrant, religiously, culturally, racially, or sexually explicit in nature –and/or imply violence or threatening acts, as determined by JH. Tattoos may not be visible on the face or anterior (side/front) neck
 - Flip flop shoes
 - Open toed shoes in patient care areas (peep toed shoes are permissible in non patient care areas). Shoe heels shall not be higher than three (3) inches in height for safety purposes
 - Artificial fingernails or fingernail enhancements in patient-facing areas (to include all clinics)
8. Employees who fail to follow personal appearance, unit/department dress code and/or personal hygiene guidelines may be sent home and directed to return to work in proper attire. Under such circumstances, employees will not be compensated for the time away from work or travel in accordance with federal, state and local law.
9. The manager/JH reserves the right to determine the appropriateness of an employee's attire. Continued failure to comply with this policy may result in corrective action, up to and including termination of employment.
10. From time to time, Executive level leadership may allow sports-team attire (ie., SeaHawks, or Port Townsend jerseys). Such allowances will be provided via written communication, with parameters outlined within. It is encouraged employees contact their Manager should they have any question on what is appropriate attire.
11. To the extent the facility and unit/department policies differ, the specific dress code policies of the unit/department will prevail and employees are required to comply with the department's guidelines.
12. Good judgment on the part of the individual employee, with periodic assistance from peers and managers, should, in most instances, be sufficient to define what is appropriate.
13. Questions concerning the Personal Appearance policy should be directed to Human Resources.

REFERENCED DOCUMENTS:

Reference Type	Title	Notes
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Attachments:

No Attachments

Approval Signatures

Approver	Date
Caitlin Harrison: Director / Business Partner	09/2017
Caitlin Harrison: Director / Business Partner	09/2017

COPY

EXHIBIT C

White, Suzy

From: Glenn, Mike
Sent: Monday, July 3, 2017 2:27 PM
To: ALLUSERS
Subject: Board Elections

Good afternoon,

As we enter into another election season, some of you have asked if it was OK for a hospital employee to campaign for a commissioner candidate. The answer is **yes...but**.

Yes, you can participate in the campaign of a commissioner candidate. Your right to engage in political activism or expression, most often defined by participating in a political campaign, is protected by state statute. **But**, employees are **not** protected by this statute during work time, and you **may not** use work time or hospital facilities (offices, copy machines, email, stationary, telephones, etc) to assist a campaign for any person's election to office.

This means district employees can campaign for a candidate but only on their **own time, using their own supplies and equipment**.

Let me know if you have a specific question about any of this, or if you would like to review the legal documents supporting my email.

Thanks, I hope this helps.

MG

EXHIBIT D

White, Suzy

From: Glenn, Mike
Sent: Monday, August 28, 2017 10:54 AM
To: ALLUSERS
Subject: Board Elections...A Reminder

Good afternoon

As we enter into another election season, some of you have asked if it was OK for a hospital employee to campaign for a commissioner candidate. The answer is **yes...but**.

Yes, you can participate in the campaign of a commissioner candidate. Your right to engage in political activism or expression, most often defined by participating in a political campaign, is protected by state statute. **But**, employees are **not** protected by this statute during work time, and you **may not** use work time or hospital facilities (offices, copy machines, email, stationary, telephones, etc) to assist a campaign for any person's election to office. **And no, you cannot talk to a patient being treated at Jefferson Healthcare about a particular candidate.**

This means district employees can campaign for a candidate but only on their **own time, using their own supplies and equipment.**

There appears to be a high level of interest in employee involvement in this election. Let's all commit to complying with Jefferson Healthcare policies and the law.

Let me know if you have a specific question about any of this, or if you would like to review the legal documents supporting my email.

Thanks, I hope this helps.

MG

EXHIBIT E

From: [Glenn, Mike](#)
To: [ALLUSERS](#)
Subject: Election "Dos" and "Don'ts" for Public District facilities
Date: Friday, September 22, 2017 5:15:41 PM
Attachments: [04-02Revised052213.rev .pdf](#)

Good afternoon,

As many of you may be aware, voters participating in the upcoming November 7, 2017 election will select one of two candidates for a position on the Board of Commissioners of the Jefferson County Public Hospital District No. 2.

Please remember that, under Washington State law, public hospital district facilities may not be used to assist the campaign of any candidate for elected office. Any election advocacy must be done on your own time and without District resources. This means that you may not use your work hours or District computers, printers, email or other District facilities for any election advocacy.

The state agency charged with enforcing these campaign rules has specifically stated:

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Attached are the Washington Public Disclosure Commission Guidelines for Local Government Agencies in Election Campaigns. Please review the table of examples of activities which are permitted and those which are prohibited related to specific district staff and facilities, starting on page 6.

Thank you

MG