February 26, 2025

CRFPD Board Meeting

Consent agenda attachment for item 4.2.v.

Background

The potential need to update of the policies displayed on the website is something we generally agree we need to review. I started the process with a discussion with SDAO’s Legal and Technical Administrator, Tonya Grass, last year. The purpose of this memo is to finalize the results of those discussions and propose recommendations to the Board.

Ms. Grass made the general comment that there is no requirement that Districts post policies on the website. She suggests that the best practice is to post information that is of interest to and most commonly requested by the public, as a transparency and efficiency measure. Some items on our Policy page may have been placed there to demonstrate compliance with certain requirements that aren’t necessarily of any interest to the public at large, and decisions related to those matters would be illustrated in the minutes if there was a specific inquiry. In other words, we don’t need to have some of these items on the website. In fact, some are undated, possibly out of date and/or may cause confusion or be inconsistent with other more updated policies.

The policies are shown in order of appearance on the website.

**Financial Policy**

Dated 4/24/2024. This is the updated version.

*Suggested action*: No action required, but suggest the policy be reviewed annually and necessary updates be made, dated and posted. This was discussed in the January Board meeting. See below for potential additions to the Financial Policy.

**Locke Scholarship Policy**

Dated 9/2020. The policy was updated in 2024, primarily regarding payment methods. It’s not clear that this policy is of interest to the public at large.

*Suggested action*: Remove from website, but verify that updated information is readily available to the RRVs, e.g. in the Employee/Volunteer Handbook.

**Public Meeting Policy**

Undated. The website version overlaps substantially with (but is not identical to) Section 3 of the current Board Policy Manual.

*Suggested action*: remove the website version and post the Board Policy Manual on the website. Review and update the Board Policy Manual with council on a schedule (e.g. in even numbered years).

**Ethics Policy**

Dated 2/23/2016. The current Ethics Policy is described in the Board Policy Manual (Section 6). *Suggested action*: remove the website Ethics Policy and post the Board Policy Manual on the website. Review and update the Board Policy Manual with council on a schedule (e.g. in even numbered years).

**Policy Regarding Legal Advice**

Dated 11/22/2011. The document itself is titled as a resolution, not a policy, and the context is unclear. Ms. Glass noted that this isn’t something she typically sees on a District website and points out that pre-loss assistance is available to the District but is only a *requirement* in certain employment matters in order to waive the deductible. At the end of the day, for any given situation the Board can decide whether to seek SDAO assistance, the assistance of Council or both.

*Suggested action*: remove this item from the website.

**Policy Adopting GASB 54**

Dated 2/2013. The document itself is titled as a resolution, not a policy, and may or may not reflect the most current accounting practices with which the District complies. Ms. Glass suggests that we have (1) a general policy for accounting practices, and (2) an investment policy; I’ve requested samples from her. I note that our Financial Policy references an investment policy (“Investments” on the last page), but I didn’t find the investment policy itself.

*Suggested action*: remove the current posting; use the templates (when received) to develop the appropriate policies and post them (or perhaps include them in the Financial Policy). The lead on this might best be with the Treasurer?

**Policy Adopting Minimum Capitalization**

Dated 2/2013 (this was perhaps adopted in conjunction with the GASB 54 policy?). The document itself is titled as a resolution, not a policy, and says District “…funds shall have a $5,000 threshold for capitalization purposes.” The intent and purpose are unclear, and it appears that no update has occurred in a dozen years.

*Suggested action:* Remove from the website unless it can be determined that it’s still relevant. If a capitalization threshold is appropriate, perhaps this would become part of the Financial Policy? Again, the lead on this might be best with the Treasurer.

**Document Retention Policy**

Dated 1/25/2011. The policy adopts OAR 166-150-0005 <https://secure.sos.state.or.us/oard/viewSingleRule.action?ruleVrsnRsn=26026>

Ms. Grass points out that we are required to comply with this regulation (along with all the other applicable regulations) whether we adopt a policy to do so or not, and she doesn’t usually see it posted on District websites.

*Suggested action*: Remove from the website.

**Public Records Disclosure Policy**

Undated. The policy says the District will comply with ORS 192.410-192.505. It looks like the State originally adopted disclosure requirements in 1973 with updates in 2015, so it’s not clear whether the language in our posted policy includes the updates. Ms. Grass suggests an updated policy and records request form be posted on the website and provided templates.

*Suggested action:* Once the templates are reviewed and approved, replace the existing language with the update.

**Cyber Liability Policy**

Dated 10/24/2017. I found it difficult to assess what’s required of our District specifically, in this policy. Eileen or Jeff Lane (Corvallis IT) might be of assistance. To what extent does the District have (in a computer, in the cloud, on a portable drive) information that is PHI (Protected Health Information), PI (Personally Identifiable Information) or PCI (Payment Card Industry data)? It is possible that we need a policy with respect to these data, but Ms. Grass notes that she doesn’t often see it posted on the website.

*Suggested action*: follow up with City on possible policy needs for the District specifically, then Eileen if needed, to develop a current policy. Remove current policy from website.

**Workplace Harassment Policy (SB479)**

Undated but SB479 became effective 9/29/2019 (not sure if there are any updates). Monica Shultz, an HR specialist at SDAO, suggested that the accurate policy is (or should be) included in the CFD employee/volunteer handbook. In the District’s case this document is managed by CFD/the City.

*Suggested actions:* remove the item from the website; confirm with CFD that the updated regulations are reflected in the current Employee/RRV Handbook; provide board members with access to the handbook and require that the policy in the handbook be read by board members annually.

**Dorm Entry Policy**

Dated 1/23/2018. This seems like a good policy to have, and to make available to RRVs and CFD, but Ms. Grass notes it’s not useful to the public.

*Suggested action*: Remove from the website but add to the Board Manual since it specifically addresses Board behavior. CFD may also choose to include this information in the employee/volunteer handbook. Also suggest editing the policy (see below); as currently stated Board members could enter bathroom/shower areas with no notice.

Current policy: The Board accepts that this personal space extends to other areas of the residential section of the Locke Station (the East side of the station beyond the apparatus bay) to include the electrical room, kitchen, day room, exercise room and bathrooms however, no notice nor any approval is required for any board member to enter these areas.

Proposed change: The Board accepts that this personal space extends to other areas of the residential section of the Locke Station (the East side of the station beyond the apparatus bay) to include the electrical room, kitchen, day room and exercise room ~~and bathrooms~~ however, no notice nor any approval is required for any board member to enter these areas. Bathroom/shower area access by board members requires that a staff member has established that the bathroom is vacated before board member entry.

**Board Duties and Responsibilities Policy Manual**

*Suggested action*: add the Manual to the website; calendar the manual for review and updates by council and Board (e.g. on even numbered years).

**Ethics Complaint Procedure**

Last fall Ms. Grass said she would be developing a template policy that we should post on this this topic; I’ve reached out to see if that’s now available.

*Suggested action*: in the absence of a template but in line with Ms. Grass’ suggestion, post on the website something along the lines of: If you have concerns that the Oregon Government Ethics Commission (OGEC) rules have been violated by a member or members of the Board, your first step is to write or email the board with your concern(s)so that the issue can be addressed. For information on filing a complaint with OGEC, please see the instructions on their website:

<https://www.oregon.gov/ogec/public-records/pages/how-to-file-a-complaint.aspx>

**Public Contracting Policy**

Ms. Grass noted that we don’t have a policy on our website, but she was uncertain as to how we currently handle contracts and noted it would be good to have our policy posted.

*Suggested action*: I’ve requested a template policy from Ms. Glass.