

## Attachment "J"

DRAFT LETTER

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 BABCNC 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 BABCNC appreciates guidance.

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 prefer two alternatives: 1) require NCs to develop digital media policies with this draft presented as a template or 2) have the City's Information Technology agency adapt current City policies to meet NC needs.

In the event that neither of these suggestions is implemented, we present the following specific feedback on the current draft of the policy:

### 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 by DONE and BONC

Enforcement of these policies are delegated to DONE 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 which 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. Given that there are already provisions in this policy to protect passwords, the Department has no reason other than exerting control over access to accounts to have passwords.

In addition, section 7.1 dictates that in an emergency communications must defer to various City agencies. This section does not say that information must match communications of those agencies but that the NC must DEFER to these agencies. This implies that NC Outreach teams led by volunteers will be responsible for contributing to the outreach efforts of City agencies. This is not acceptable. City agencies have substantial staff paid to get their messages out to residents. That these may be underdeveloped and inadequate should not confer responsibility on the neighborhood council. The neighborhood council’s participation in and amplification of City-sponsored outreach efforts is at will and should not be required.

The policy dictates that no neighborhood council may include endorsement of private entities, including non-profit organizations. This should include an exclusion for announcements related to Neighborhood Purpose Grants. If the NC spends money supporting the work of a non-profit, stakeholders deserve to know about it.

#### Extra Administrative and Board Work

BABCNC 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.

To require the board to vote on every digital media account wastes everybody’s time, and to inform the board of all digital communications would also detract from other efforts. Most board members will have the ability to (and should be) consumers of the neighborhood council’s digital media content and that should be sufficient for oversight.

The requirement for setting up separate email accounts for administration and keeping accounts attached to those email addresses would require substantial extra unnecessary work.

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, then 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

The policy states that the council shall have “as few neighborhood council Digital Communications accounts as possible”. Since policy has already dictated requirements for digital media accounts, this

would seem to be saying that the NC should operate on as few platforms as possible. Since each platform has a specific purpose and a specific demographic, adhering to this would limit the outreach capacity of the NC. For example, if BABCNC wanted to get a TikTok account to try to engage young people, we should presumptively resist the impulse because it would violate this principle? It's not imperative to provide a set and consistent level of activity on each platform. If an NC wanted to produce a series of YouTube videos this doesn't compel them to continue to keep producing YouTube videos in the future at the same rate.

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 council's 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

Again, BABCNC 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.

Best regards,