

INFORMATIONAL MEMORANDUM

Tukwila Metropolitan Park District

TO: Tukwila Pool MPD Board
FROM: Verna Seal, Board President
DATE: November 13, 2013
SUBJECT: Suggestion Box Policy

ISSUE

Adoption of Suggestion Box Policy.

FINANCIAL IMPACT

No Financial Impact

BACKGROUND

In June 2013, the Tukwila Pool Advisory Committee (TPAC) proposed the MPD install a suggestion box at the pool. The box was installed in August and the first round of suggestions was reviewed.

Snure Law Offices was requested to review the procedures to ensure we were meeting requirements as they relate to public access and adherence to public records laws and responsibilities. On October 1, 2013, the Board received legal advice on procedures for the Suggestion Box at the pool.

DISCUSSION

The attached policy incorporates the input and advice of the MPD Board Attorney.

RECOMMENDATION

Adoption of attached policy.

ATTACHMENTS

- A. Draft Suggestion Box Policy
- B. Snure Law Offices review and recommendation
- C. TPAC Suggestions

Subject	Suggestion Box Policy	Policy #	
Effective Date	Immediately		
Last Revised			
Approved By		Date	

PURPOSE OF POLICY: To establish policy and guidelines for Suggestion Box Procedures.

POLICY STATEMENT: A suggestion box provides patrons an avenue to provide feedback and comments to the Tukwila Pool Metropolitan Park District (MPD).

PROCESS: The following shall provide for accurate and consistent collection, retention, review and response to suggestion box comments.

Access to Suggestion Box: The MPD Board shall retain the ability to access the suggestion box. An MPD Board member will be designated as the primary custodian of the suggestion box and shall collect and log all suggestions on a monthly basis.

Collection of Suggestion Cards: Once suggestion cards have been collected and logged they shall be available for review by Contracted Staff and TPAC members.

Storage and Retention of Suggestion Cards: All suggestions submitted to the Park District suggestion box become public records of the Park District. Accordingly, primary copies shall be retained and remain in the custody of the Park District to ensure compliance with the Revised Code of Washington (RCW). The MPD Board shall direct where suggestion card records are stored.

Tracking System and Suggestion Review: The designated Board member opening the suggestion box shall provide a tracking report to the MPD Board at a regularly scheduled occurrence. The tracking report shall include the name(s) of person(s) collecting and reviewing the suggestion cards, the date suggestions were collected, the verbatim wording contained within each suggestion provided, a recommendation for response, or, for purely operational matters, how the suggestion was responded to. All documentation of tracking, review and recommendations shall be maintained as Park District records. The MPD Board shall direct where suggestion cards and tracking records are stored.

Responses to or Implementation of Suggestions: The MPD Board shall control all substantive responses to, or implementation of, any suggestions received. The MPD Board shall direct and take action on all substantive recommendations before they are implemented. The Governing Board shall delegate responsibility for operational decision making related to suggestions to its contracted staff.

Confidentiality: Suggestion box submissions shall be treated confidentiality, however a promise of confidentiality regarding the suggestions placed in the box is not appropriate as all suggestions made are subject to disclosure under the Public Record Act.

DEFINITIONS:

MPD Board: The Tukwila City Council serves as the Governing Board of the Park District pursuant to RCW 35.61.050(3). The Governing Board is the legislative and governing body of the Park District. The general authority of the Governing Board is to exercise the powers granted to the Park District are set forth in Chapter 35.61 RCW. The Governing Board also has the authority to delegate authority and responsibility as necessary to operate the Park District.

TPAC: The Governing Board exercised its power to create TPAC by Resolution to “serve in an advisory capacity” to the Governing Board. *Tukwila Metropolitan Park District, Resolution No. 8*. As a Governing Board created advisory committee, TPAC is an extension of the Park District and has no independent existence. TPAC must comply with all legal requirements that apply to the Park District. For example, if the Park District delegates to TPAC responsibility to collect, track and review suggestions from the suggestion box, the records created in the review and tracking process are public records of the Park District. TPAC members must be aware of this requirement. All TPAC records are Park District records and TPAC created records must remain in the custody of the Park District and retained in a manner that complies with the Park District’s record retention requirements.

Contracted Staff: Contracted staff is defined as the staff that works for the support services contractor.

DRAFT

SNURE LAW OFFICE, PSC

A Professional Services Corporation

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October 1, 2013

MEMORANDUM

To: Governing Board, Tukwila Pool Metropolitan Park District

From: Brian Snure

Re: Suggestion Box Procedures

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Issue: How should the Park District manage the recently established suggestion box at the Pool?

Background: In June 2013, the Tukwila Pool Advisory Committee “TPAC” recommended that the Park District implement a suggestion box at the pool to “increase community voice and involvement.” TPAC included with its recommendation the following proposed process for managing the suggestion box and suggestions received through suggestion box.

1. TPAC Members will work with the contracted staff to acquire and install a secured suggestion box to be located in the lobby or other mutually agreed on prominent location at the Tukwila Pool. Key will be held by a designated TPAC Member.
2. TPAC Members will work with contracted staff to produce and post appropriate signage and suggestion cards. Signage and cards will include language directing urgent and immediate needs to contracted staff.
3. contracted staff will ensure the suggestion cards are adequately stocked and writing utensils provided as necessary.
4. TPAC Members will collect suggestion cards at an interval no longer than quarterly, but will attempt to collect them monthly.
5. At collection TPAC Member(s) will jointly pre screen the suggestion cards with contracted staff to identify operational issues.
6. TPAC Members will develop an internal tracking system (spreadsheet) for all suggestion cards and review them at TPAC Meetings. This will become a standing agenda item.

7. TPAC Members will make recommendations from the suggestion cards to the Board/contracted staff as appropriate.
8. TPAC Members and contracted staff shall consider suggestion cards and spreadsheet entries to be confidential, however, they shall be made available to the Board as requested or needed.

The Governing Board authorized TPAC to work with staff to implement the suggestion box to be managed consistent with the recommendations and process set forth by TPAC. Subsequently certain questions have arisen regarding the process and whether the process as implemented is consistent with the statutes, such as the Public Records Act, that govern the Park District.

Analysis:

General Premise: The suggestion box is a Park District suggestion box. Accordingly, the management of the suggestion box must be in compliance with the statutory requirements that apply to public assets and public records.

Status of the Park District, the Governing Board and TPAC.

Park District: The Tukwila Metropolitan Park District is a special purpose municipal corporation created and governed by chapter 35.61 RCW.

Governing Board: The Tukwila City Council serves as the Governing Board of the Park District pursuant to RCW 35.61.050(3). The Governing Board is the legislative and governing body of the Park District. The general authority of the Governing Board is to exercise the powers granted to the Park District are set forth in Chapter 35.61 RCW. The Governing Board also has the authority to delegate authority and responsibility as necessary to operate the Park District.

TPAC: The Governing Board exercised its power to create TPAC by Resolution to “serve in an advisory capacity” to the Governing Board. *Tukwila Metropolitan Park District, Resolution No. 8*. As a Governing Board created advisory committee, TPAC is an extension of the Park District and has no independent existence. TPAC must comply with all legal requirements that apply to the Park District. For example, if the Park District delegates to TPAC responsibility to collect, track and review suggestions from the suggestion box, the records created in the review and tracking process are public records of the Park District. TPAC members must be aware of this requirement. All TPAC records are Park District records and TPAC created records must remain in the custody of the Park District and retained in a manner that complies with the Park District’s record retention requirements.

Recommendations for Suggestion Box Procedures:

With the above relationships in mind, I offer the following recommendations regarding the suggestion box procedures.

1. **Access to Suggestion Box.** The Governing Board should retain the ability to access the suggestion box separate from any access delegated to TPAC. The Governing Board's access could be through contracted staff or by providing the President of the Governing Board with a key to the box.
2. **Collection of Suggestion Cards.** The suggestion cards should either be initially collected and logged by contracted staff or, if the Governing Board wishes to have TPAC continue this role, TPAC's responsibility should be further defined consistent with recommendation No. 3.
3. **Storage and Retention of Suggestion Cards.** All suggestions submitted to the Park District suggestion box become public records of the Park District. Accordingly, it is imperative that the primary copies be retained in the custody of the Park District. If TPAC members are authorized to obtain the cards, TPAC members must be directed where to deliver the original records for proper storage and custody. If TPAC members want to take the suggestion cards offsite for review or analysis, TPAC members should only take copies of the records.
4. **Tracking System and Suggestion Review.** If the Governing Board wants TPAC to track, review and provide recommendations, the Governing Board should be clear that all documentation of the tracking, review and recommendations should be maintained as Park District records. TPAC members that create such records should be directed where to deliver and store the records.
5. **Responses to or Implementation of Suggestions.** The Governing Board should control all substantive responses to, or implementation of, any suggestions received. Once again, the Governing Board may wish to have TPAC review, process and make recommendations regarding responses or implementation of suggestions but the Governing Board should direct and take action on all recommendations before they are implemented. The Governing Board, of course, may delegate responsibility for operational decision making related to the suggestions to its contracted staff.
6. **Confidentiality.** While I have no objection to the procedure advising contracted staff and TPAC members to treat suggestions confidentially, neither contracted staff or TPAC members should ever make any promises of confidentiality regarding the suggestion box as all suggestions made are subject to disclosure under the Public Record Act.

If you have any further questions, regarding these issues, please advise.

Suggestion Box

Purpose:

To provide patrons an additional avenue to provide suggestions, feedback, comments to the Tukwila Pool Metropolitan Park District.

Background:

STP members commented that a suggestion box located at the pool could be a way of reaching out to patrons. It was noted that many ideas over the past CIP and year have been a result of Patron Suggestions. Some examples are: Privacy Change Areas, Improved ADA Access, Scholarship Program. These have provided a more comfortable and improved experience for pool patrons. TPAC members discussed the pros and cons at the May 8, 2013 meeting and decided to proceed with background work for a presentation for the June TPMPD meeting in support of the idea.

Process:

- TPAC Members will work with the Contracted Staff to acquire and install a secured suggestion box to be located in the lobby or other mutually agreed on prominent location at the Tukwila Pool. Key will be held by a designated TPAC Member.
- TPAC Members will work with Contracted Staff to produce and post appropriate signage and suggestion cards. Signage and cards will include language directing urgent and immediate needs to Contracted Staff.
- Contracted Staff will ensure the suggestion cards are adequately stocked and writing utensils provided as necessary.
- TPAC Members will collect suggestion cards at an interval no longer than quarterly, but will attempt to collect them monthly. At collection TPAC Member(s) will jointly prescreen the suggestion cards with Contracted Staff to identify operational issues.
- TPAC Members will develop an internal tracking system (spreadsheet) for all suggestion cards and review them at TPAC Meetings. This will become a standing agenda item.
- TPAC Members will make recommendations from the suggestion cards to the Board/Contracted Staff as appropriate.
- TPAC Members and Contracted Staff shall consider suggestion cards and spreadsheet entries to be confidential, however, they shall be made available to the Board as requested or needed.

Summary

TPAC feels this community outreach is a valuable resource for the TPMPD and would be happy to take on the added responsibility. There are future possibilities of expanding this outreach to include online surveys/suggestions.