

# **ST. CLAIR COUNTY COMMUNITY MENTAL HEALTH AUTHORITY**

## **BOARD POLICY**

Date Issued **12/23**

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### **I. APPLICATION:**

- ☒ SCCCMHA Board
- ☐ SCCCMHA Providers & Subcontractors
- ☒ Direct-Operated Programs
- ☐ Community Agency Contractors
- ☐ Residential Programs
- ☐ Specialized Foster Care

### **II. POLICY STATEMENT:**

It shall be the policy of St. Clair County Community Mental Health Authority (SCCCMHA) to ensure all communications with the general public are presented in a clear and consistent format, following the written ethical code of conduct for marketing, established standards and guidelines for interaction with the media, appropriate use of the St. Clair County Community Mental Health Authority logo, acceptable elements of design, and required reading proficiency levels.

### **III. DEFINITIONS:**

- A. **Marketing**: is the use of paid or unpaid promotional opportunities with a goal of promoting a particular service, program, or special event offered by SCCCMHA.
  - 1. **Elements of design**: refers to the arrangement and spacing of information on a page or advertisement, use of font style and type size, and use of illustrations in order to make information easy to understand.
  - 2. **Media**: refers to representatives of newspapers, magazines, newsletters, radio stations, television stations, internet websites, and social media platforms who ask for information with the intent of publicly disseminating information gathered through interview or conversation.
  - 3. **Logo**: refers to the board approved graphic illustration that represents St. Clair County Community Mental Health Authority.
- B. **“Person-First Language”**: refers to referencing a person first before any description of disability.
- C. **Public Communication**: includes, but is not limited to, the use of press releases, public service announcements, interviews with reporters, print advertisements, radio/television advertising, flyers, posters, brochures, billboards, banners, website content, Facebook and other social media content event participation and sponsorships to communicate information about SCCCMHA services or programs to the communities we serve or to a larger audience.

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#### IV. STANDARDS:

- A. All external publications/public communications will be reviewed by the Supervisor or Designee prior to distribution.
- B. SCCCMHA employees are not authorized to make public comment or communicate with the media regarding SCCCMHA services, projects, and activities unless directed to do so by the Chief Executive Officer or their designee.
- C. Person-first language will be used in all public communications.
- D. All public communication that is not generated or distributed by a member of the Community Relations Department will be copied to the Community Relations Supervisor to be maintained in a reference file.
- E. No service, program, or activity offered by SCCCMHA is authorized to create a new logo, unless authorized, for the purpose of branding the service or program. Only the SCCCMHA logo will be used for this purpose.
- F. All public communications regarding services, programs, or activities offered by SCCCMHA will clearly indicate that the service, program, or activity is offered by SCCCMHA.
- G. All communications intended for the general public will be written at or below the fourth grade reading level when possible. In some situations it is necessary to include information, medications, diagnoses, and conditions that do not meet the fourth grade reading level criteria.
- H. All printed publications (e.g. newsletters, brochures, booklets) will include an initial publication date or revision date if the publication was revised prior to re-printing. Minimum information will be month and year of publication. Recommended information will include: month and year of publication and file path of the publication.
- I. All publications will use elements of design that make reading the publication easier. These include, but are not limited to, appropriate font size and use of legible fonts, images, and universal symbols where appropriate.
- J. All public events attended by SCCCMHA staff on behalf of the agency will be reported to the Community Relations Department. Information to be reported includes: date, organization visited, topic of presentation, approximate age and number of persons present at presentation, any promotional "give away" items used at the event, and PowerPoint materials/handouts given, if any.
- K. SCCCMHA staff may not accept any form of stipend or honorarium in exchange for participating in a speaking engagement on behalf of SCCCMHA.

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- L. SCCCMHA staff who are cited in printed articles or interviewed on radio/television are asked to send clippings or air dates of coverage to the Community Relations Department for tracking purposes.
- M. Standard contact information on all written public communication will include: the local, toll-free numbers for the Access Center, and the address and main phone number of the SCCCMHA Administration Office unless the publication specifically describes a program/service that is offered only at a remote location and inclusion of the local address will enhance promotion of the program or service.

V. PROCEDURES:

A. Media Coverage

**All SCCCMHA Staff**

1. Transfers the call to the Chief Executive Officer's office or to the Community Relations Department if the Chief Executive Officer is unavailable.
2. Explains to the media the agency policy by saying "All media calls are handled by the Chief Executive Officer's office. I will transfer you to that department."

**Community Relations Department**

3. Issues press releases and public service announcements on behalf of SCCCMHA and its divisions, departments, programs, services, activities, and events.
4. Forwards copies of all press releases to the Chief Executive Officer or their designee to ensure awareness of potential media contacts for comment.

**Chief Executive Officer**

5. Notifies the Community Relations Department when a public interview/comment has been given for the purpose of tracking public communications.

**Community Relations Department / Designee**

6. Maintains listing of media contacts that includes media identification, SCCCMHA contact person(s), date of contact, and subject addressed.

B. Publications

**Community Relations Department / Designee**

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1. Coordinates the production of all publications (e.g. brochures, flyers, booklets, website, social media content, annual reports, newsletters, posters, and videos) intended for public distribution.

#### **All SCCCMHA Staff**

2. Use consistent contact information on all SCCCMHA publications.
3. Use the official SCCCMHA logo on all publications.

#### **Community Relations Department / Designee**

4. Ensures all publications are identified to the SCCCMHA organization, not to individual divisions, departments, programs, or staff members.
5. Ensures publications are written at an acceptable reading level, as determined by the Michigan Department of Health and Human Services.
6. Includes, where appropriate, the names of the SCCCMHA Board of Directors and leadership team in publications.
7. Ensures appropriate consents/releases are on file prior to gaining access to information about individuals receiving SCCCMHA services. (ref. administrative procedures #05-003-0010).

#### **Casemanagers/Clinicians**

8. Asks individuals who use SCCCMHA services if they are interested in being included in a publication, informing the individuals they are under no obligation to participate in a publication.
9. Obtains required consent forms/and releases prior to passing along private information about any individual.

### **C. Health Fairs, Speakers, Sponsorships, Other Communications with the Public**

#### **All SCCCMHA Staff**

1. Notifies the Community Relations Department when he/she has been contacted to participate in a community event, speaking engagement, or participate virtually or in-person in any other public event as a representative of SCCCMHA.

#### **Community Relations Department / Designee**

2. Provides promotional “give away” items, appropriate printed publications, display board, or other items needed by staff participating in an event.

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3. Staffs SCCCMHA table at an event, or makes arrangements for other trained staff to represent SCCCMHA.

D. **Marketing**

**Community Relations Designee**

1. Designs print advertisements, billboards, flyers, and other promotional materials, or reviews the designs of others to ensure it aligns with SCCCMHA's "Marketing Code of Ethics".
2. Writes radio or television advertisements, or reviews those written by others to ensure it aligns with SCCCMHA's "Marketing Code of Ethics".
3. Creates social media content or reviews content created by others to ensure it aligns with SCCCMHA's "Marketing Code of Ethics."
4. Verifies billings for paid advertisements and forwards for approval, ensuring payments are only made for advertisements that actually occurred.

**All SCCCMHA Staff**

5. Directs all requests for advertisements or sponsorships to the Chief Executive Officer's assistant.

**Chief Executive Officer / designee**

6. Approves all paid advertisements or sponsorships prior to agency commitment to participate.

VI. **REFERENCES:**

- A. MDHHS Contract
- B. Michigan Mental Health Code Section 330.1724

VII. **EXHIBITS:**

- A. SCCCMHA "Marketing Code of Ethics"

VIII. **REVISION HISTORY:**

Dates issued 04/08, 04/10, 01/12, 05/13, 05/14, 05/15, 09/16, 09/17, 11/18, 11/19, 11/20, 12/21, 12/22.

## **St. Clair County Community Mental Health Authority**

*The Board of Directors of St. Clair County Community Mental Health Authority adopted at its regular meeting on May 3, 2022:*

### Board Statements on

- Legal Requirements and By-Laws
- Risk Management
- Accessibility
- Rights of Persons Served
- Technology
- Human Resources Management
- Cultural Competency / Diversity
- Health and Safety
- Financial Planning and Management
- Marketing Code of Ethics
- Addressing Behavior Concerns Involving Individuals Receiving CMH Services

These plans have been endorsed by the Board of Directors of the St. Clair County Community Mental Health Authority.

  
CMH Board Chairperson

5-3-22  
Date

St. Clair County Community Mental Health Authority

## **Board Statement on**

### *Marketing Code of Ethics*

*The Board of Directors of St. Clair County Community Mental Health Authority (SCCCMHA) adopted at its regular meeting on May 3, 2022.*

This code of ethics will guide the marketing practices within the St. Clair County Community Mental Health Authority. We define marketing as the intentional distribution of information in various forms with the goals of:

- Describing the availability of services and supports offered by St. Clair County Community Mental Health Authority
- Informing the public how to access available services and supports
- Diminishing the stigma associated with mental illnesses, intellectual/developmental disabilities, and substance use disorders

The Marketing Code of Ethics adheres to the following standards:

1. Marketing efforts will accurately portray services provided.
2. SCCCMA will not engage in false or misleading advertising regarding facts about programs, benefits offered, outcomes of services, costs of services or credentials of providers.
3. High pressure techniques or manipulation will not be used in promoting services to the public, to referral sources, or to those who use SCCCMA services.
4. No deceptive practices will be used when advertising in any type of media; this includes but is not limited to print, radio, television, and social media outreach.
5. All materials written exclusively for individuals served will be written at or below a fourth grade level, per Michigan Department of Health & Human Services mandate.