

UTAH DEPARTMENT OF HEALTH AND HUMAN SERVICES POLICY AND PROCEDURES		
Policy: 06-05		Page 1 of 10
CONTENT CREATION AND REVIEW POLICY		
<p><b>RATIONALE:</b> The Utah Department of Health and Human Services is working to meet its vision that all Utahns have fair and equitable opportunities to live safe and healthy lives. All DHHS communication, written and visual, is a large contributor to realizing this vision and as a result, review and oversight of materials being released to the public and to DHHS staff is essential. DHHS requires clear and consistent language and professional visuals across all products, both internal and external. This policy and its procedures are consistent with this rationale as the department pursues its goal of ensuring that all Utahns are healthy and safe.</p> <p><i>Related Policies, Applicable Standards, Statutes:</i>  DHHS Policy 06-01, 06-02, 06-03, 06-04, Utah Code § 63G-2-103(22)</p>		
<b>Original Effective:</b> <b>September 1, 2023</b>	<b>Revision:</b>	<b>Next Review Due:</b> <b>September 1, 2028</b>

## I. DESCRIPTION

This policy is designed to provide direction on the levels and process of review for written and visual communications content being developed and released by the department publicly or communicated to a large audience internal to DHHS.

This policy supersedes any previous department policy governing this subject matter. It does not supplant any existing federal, state, or department laws/policies to which the department shall adhere.

## II. DEFINITIONS

The following terms are defined for this policy as:

- A. **Content:** All written, visual, or audible copy, ideas, illustrations, information, diagrams, designs, messages, photographs, or other materials produced by DHHS staff, contractors, or vendors on behalf of DHHS. Content is primarily intended to be public-facing or distributed to a large number of people. This may include, but is not limited to: reports, legislative materials, data briefs, educational (including Q&As) and training materials, social media posts, websites, videos, images, strategic plans, press releases, and internal communications.
- B. **Content approval:** The final department-level approval of content before publication or dissemination. This authority rests with PAE and EDO.
- C. **Content approver:** A member of PAE who has the authority to allow or stop the dissemination of a document after a document is finalized or nearly finalized by an OU director or designee. An approver may also be a member of EDO if the content is deemed to be sensitive material.
- D. **Content creator:** A DHHS staff member, contractor, or vendor who creates content.
- E. **Content review:** The process a content creator undertakes to get feedback on content during the development process, prior to content approval, and during regular intervals after publication or dissemination.
- F. **Content reviewer:** A person who needs to be consulted and may provide input on content. Reviews may happen at the OU, PAE, or EDO level during the content creation process, depending on the sensitivity of the content.
- G. **Culturally appropriate:** Content that is respectful and recognizes cultural differences and the nuances, values, and sensitivities of the target audience.
- H. **DHHS-affiliated media:** Any digital media, website, or online application created by an operational unit within the department, including those created for an operational unit by a vendor.
- I. **DHHS or department:** The Utah Department of Health and Human Services and any operational unit within.
- J. **DSE:** The DHHS Division of Data, Systems, and Evaluation
- K. **DTS:** The Utah Division of Technology Services and collectively all its operational units.
- L. **EDO:** The DHHS executive director's office.
- M. **Objectionable or offensive content:** Content that is obscene, pornographic, libelous, defamatory, unlawful, offensive, or otherwise violates a publisher's standards or guidelines.
- N. **Operational unit (OU):** Operational units within DHHS, including divisions, offices, or standalone operations whose director reports to the executive

director, a deputy director, or an assistant deputy director. The Utah State Hospital and Utah State Developmental Center are considered OUs.

- O. **Public Affairs and Education (PAE):** The DHHS Office of Public Affairs and Education. The DHHS communication director is the director of this office.
- P. **Personally identifiable information (PII):** Personally identifiable information (PII) is any data that could potentially identify a specific individual. It may include the following: name, address, email, telephone number, date of birth, passport number, fingerprint, driver's license number, credit or debit card number, bank account, and Social Security number.
- Q. **Public information officer (PIO):** Public information officers are designated spokespersons and media coordinators for the department. PIOs are housed in the PAE, unless granted exemption by the DHHS executive director. PIOs are responsible for working with OUs to respond to public information and media requests.
- R. **Public information officer (PIO) liaison:** Staff in OUs who are designated by their OU director as the first point of contact and subject-matter experts for PAE to coordinate public relations issues, marketing and outreach, media engagement, and communication strategies as needed for their OU. These individuals shall complete training provided by PAE to be authorized spokespeople for their area of expertise or responsibility. PIOs and PIO liaisons are not synonymous and have different authorization per this policy.
- S. **Public materials:** Any material produced to communicate a message to a broad audience, including but not limited to, the following: advertisements, brochures, fact sheets, mailers, newsletters, newspaper inserts, paid social media ads, reports, scripts, social media, videos, websites, etc.
- T. **Sensitive content:** Includes content that may be culturally or politically sensitive and may include content: (i) related to controversial issues; (ii) about recent or pending high-profile or controversial legislation; (iii) related to topics that are consistently in the news; (iv) with the potential to impact other agencies; and (v) developed for a national audience.

### III. POLICY

- A. Content development
  - 1. When developing content, content creators shall consider and may apply the following principles:
    - a) Content shall align with the mission and vision of DHHS and the Governor's Office.
    - b) Content shall improve the customer experience.

- c) Content shall be seen as an appropriate use of taxpayer funds.
  - d) DHHS leadership shall be comfortable discussing this content with the public, the governor, the Utah State Legislature, and the media.
  - e) Content shall be culturally appropriate.
  - f) Content shall promote trust.
  - g) Content shall not be objectionable or offensive, and that determination shall be made in consultation among the content reviewer and the content approver.
  - h) When using words that may be misunderstood, the word shall be defined or put in context to avoid misinterpretation.
2. Content creators shall:
- a) Make sure content adheres to related policies, standards, and statutes, including but not limited to the following:
    - 1) DHHS Graphics Standards Guide;
    - 2) DHHS Writing Style Guide;
    - 3) DHHS Policy 06-01 Public Education;
    - 4) DHHS Policy 06-02 Media and Public Information;
    - 5) DHHS Policy 06-03 Websites and Online Applications;
    - 6) DHHS Policy 06-04 Language Access; and
    - 7) State of Utah web standards, guidelines, and design systems.
  - b) Consider the principles established in Section III.A.1.
  - c) Make sure content posted publicly does not include any personally identifiable information (PII) or any demographic information that could reveal any individual's identity without consent, as outlined in DHHS Policy 06-02 Media and Public Information.
  - d) Cite sources appropriately or seek permission to use images or video.
- B. Content review and approval: All content released to the public shall be reviewed, at appropriate levels, depending on the content, and in accordance with the following:
- 1. EDO and PAE review and approval are required, prior to publication, for the following:
    - a) All sensitive content; and
    - b) The following materials that do not contain sensitive content:
      - 1) Documents distributed to policymakers or used in public hearings or committees;

- 2) Documents distributed to the Governor's Office;
      - 3) Documents released to the public except those released in response to a GRAMA request;
      - 4) Documents and statements released to the media;
      - 5) Presentations given by DHHS employees to national organizations; and
      - 6) Content elevated to EDO from PAE for review.
    - c) PAE shall review and approve all public materials and non-sensitive content, including but not limited to the following:
      - 1) Social media posts;
      - 2) Education and training materials, with the exception of procedural and operational training materials; and
      - 3) Materials the OU director or their designee determine that the content requires review from PAE or EDO.
  2. Content in Spanish shall be approved by the PAE Spanish-speaking PIOs.
  3. Public materials shall be reviewed by the OU responsible for the materials and approved according to the following timelines, unless otherwise directed by or requested of PAE or EDO:
    - a) Public materials which are publicly posted on a DHHS website shall be reviewed at least yearly.
    - b) Public materials deemed to be sensitive material shall be reviewed at least every two years.
    - c) All other public materials shall be reviewed at least every five years.
  4. Any department website with links to external websites or external documents (not produced by the state of Utah) shall include a disclaimer or link to the department disclaimer stating, "The Utah Department of Health and Human Services may occasionally link to outside sources of information. DHHS and the state of Utah do not necessarily endorse the provider of the content and are not responsible for any content published on the external site." The disclaimer is available at [dhhs.utah.gov/disclaimer](http://dhhs.utah.gov/disclaimer).
- C. Content for social media
1. Content creators shall adhere to the policies and procedures for social media as outlined in:
    - a) DHHS Policy 06-01 Public Education;
    - b) DHHS Policy 06-03 Websites and Online Applications; and

- c) Annual Division of Technology Services Security Awareness training.
  - 2. Social media shall be used to help educate people about DHHS programs, services, and events and bring positive attention to the department.
  - 3. DHHS-affiliated social media channels shall not be used to share or promote opinions or advocate for political groups, or other groups or programs that do not align with the DHHS vision and goals.
  - 4. DHHS-affiliated social media shall not be used in a way that creates arbitrary posts that do not have relevance to the department, its vision, or its programs.
  - 5. PAE shall have full administrative rights or access to the account logins and passwords for all DHHS-affiliated digital media accounts, per DHHS Policy 06-01 Public Education.
  - 6. Content on DHHS-affiliated social media platforms should be directly related to the department's vision and goals. All light-hearted content designed to cultivate increased audience interaction shall be in good taste and consistent with the principles for the department's content development listed in Section III.A.
  - 7. Per DHHS Policy 06-01 Public Education, the department shall have controls in place to make sure those with login information do not share the login information improperly and do not use the accounts for unauthorized posts.
- D. Roles and responsibilities
- 1. Content creators shall:
    - a) Follow the content development principles in Section III.A.;
    - b) Be responsible for translation of materials if needed or required;
    - c) Follow OU content review processes;
    - d) Send content to DSE for review if content contains data provided by DSE;
    - e) Obtain content review by PAE, if necessary;
    - f) Send content to PAE for content approval prior to publication or dissemination;
    - g) Prior to acceptance, notify the OU director or designee of any invitations to speak or present at conferences or other events in their official capacity as a state employee; and

- h) Maintain an inventory of existing content for the OU and submit content to PAE for approval according to the timeline listed in Section III.B.3.:
    - 1) Content creators or web content editors shall review website content on an ongoing basis.
    - 2) A review of website content shall occur at least yearly.
- 2. OU director or designee shall:
  - a) Identify a PIO liaison to be the first point of contact with PAE for content review and approval and media relations, as outlined in DHHS Policy 06-02 Media and Public Information;
  - b) Review content created by staff within their OU in accordance with and ensure adherence to the following:
    - 1) DHHS Graphics Standards Guide;
    - 2) DHHS Writing Style Guide;
    - 3) DHHS Policy 06-01 Public Education;
    - 4) DHHS Policy 06-02 Media and Public Information;
    - 5) DHHS Policy 06-03 Websites and Online Applications;
    - 6) DHHS Policy 06-04 Language Access; and
    - 7) State of Utah web standards, guidelines, and design systems.
    - 8) Documents shall be in a high-quality format prior to release for the next level of content review.
  - c) Develop an OU-specific review process;
  - d) Identify and notify PAE and EDO of sensitive materials for review and approval; and
  - e) Make sure all requirements of this policy are followed.
- 3. The DSE director or a designee shall:
  - a) Review public materials that include data originating from the division before the material is submitted to PAE for approval.
  - b) Data originating in other OUs that is sent to DSE for storage or other purposes is not subject to this requirement. This includes data sent to and stored in the data warehouse.
- 4. PAE shall:
  - a) Develop a process for content review and approval;
  - b) Provide training for content creators, PIO liaisons, and OU directors so they are aware of the review and approval process and understand their roles in the process;
  - c) Create content for the department as needed;

- d) Translate content into other languages for the department, as needed;
  - e) Provide content review, as needed; and
  - f) Identify and notify EDO of sensitive materials for review and approval.
- 5. Office of Legislative Affairs, prior to EDO approval, shall review content matching the following criteria:
  - a) Distributed to legislators;
  - b) Used in public hearings; or
  - c) Used in legislative committee meetings.
- 6. EDO or their designee shall:
  - a) Review content sent to EDO from content creators, OU directors, or PAE; and
  - b) Approve content identified in Section III.B.1.
- E. Failure to comply with these policies may result in disciplinary action.

#### **IV. PROCEDURE**

- A. Content creators and the OU director or designee shall consider the following before submitting content for approval by PAE or EDO:
  - 1. Does the content have a clear audience and communication goal?
  - 2. Does the content align with the department's vision and goals?
  - 3. Has more than one person reviewed the content?
  - 4. Has the content been reviewed by any relevant stakeholders?
  - 5. Does content involve another OU's expertise?
  - 6. Has the data been checked by DSE or other data subject-matter experts?
  - 7. Has the content been checked for adherence to DHHS branding and writing style guidelines, as well as other related DHHS policies?
  - 8. Is the content considered sensitive material?
  - 9. Does the OU have a process to review current material?
  - 10. Does the OU have a process to maintain an inventory of existing content, including websites?
- B. PAE shall assign a PIO to each OU to assist with content review and approval.
- C. Content approval workflow:
  - 1. All content shall have more than one person review the material prior to distribution.
    - a) Content that will be translated into non-English languages shall have more than one person review the content.

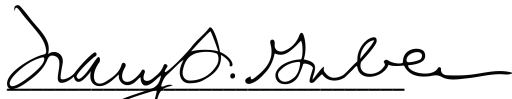


- 1) Content shall be approved by PAE in English first, before translation begins.
  - 2) Content in Spanish shall be approved by the PAE Spanish-speaking PIOs after the content is approved in English by the OU's assigned PIO.
2. PAE shall work with the PIO liaison in each OU on media requests and media materials, as outlined in DHHS Policy 06-02 Media and Public Information.
3. Content creators and OU directors or their designees shall submit content to their assigned PIO for review or approval.
4. Content creators shall make every effort to submit content for review and approval one month prior to content publication deadlines.
5. PAE shall submit sensitive content to EDO for final approval. The assigned PIO shall notify EDO if the content is considered sensitive materials and help facilitate approval with EDO and the content creator or OU director or designee.
6. Content approval shall be provided in writing by PAE to the content creator or OU director or designee to the content creators.
7. EDO shall provide approval in writing to the content creator, OU director or designee, and PAE for content deemed to be sensitive material.
8. Content reviewers and approvers shall provide timely review and feedback, consistent with the level of review that was expected.
  - a) As outlined in DHHS Policy 06-02 Media and Public Information, PAE shall make every effort to return materials within 3–5 working days. Materials that are more than five pages, difficult to review, or which require plain language or translation by PAE should be submitted with a minimum two-week window for approval. PAE shall communicate with OUs if a longer timeframe for approval is needed due to extenuating circumstances.
  - b) Several rounds of review may be necessary before a content creator or OU director or designee submits content for approval.

## **V. EXCEPTIONS**

- A. PAE may suggest exceptions to this policy with approval from EDO.

- B. EDO may make exceptions to this policy as necessary.
- C. Exceptions shall also meet the criteria found in these applicable policies:
  - a) DHHS Policy 06-01 Public Education;
  - b) DHHS Policy 06-02 Media and Public Information;
  - c) DHHS Policy 06-03 Websites and Online Applications; and
  - d) DHHS Policy 06-04 Language Access.

  
Tracy S. Gruber

Date September 1, 2023

Utah Department of Health and Human Services Executive Director