



**State of Washington
PUBLIC DISCLOSURE COMMISSION**

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September 6, 2021

Delivered electronically to "bertmills@gmail.com"

Subject: Complaint regarding Riverview School District Officials, Dr. Anthony Smith, Superintendent, PDC Case 94420

Dear Bert Mills:

The Public Disclosure Commission (PDC) has completed its review of the complaint you filed on June 24, 2021. Your complaint alleged that Riverview School District Officials, Dr. Anthony Smith, Superintendent, may have violated RCW 42.17A.555 by using District facilities to assist the re-election campaign of Sabrina Parnell, an incumbent school board member, when the District communicated to the public information about Ms. Parnell receiving The Bridge-Builder Pin award.

The complaint also alleged District officials violated RCW 42.17A.575 by including Sabrina Parnell in a Public Service Announcement (PSA) concerning her receipt of The Bridge-Builder Pin award because municipal officers are prohibited from appearing in a PSA from January 1 through the general election if the municipal officer is a candidate for public office.

PDC staff reviewed your allegations; the applicable statutes and rules; the responses provided on behalf of Riverview School District Officials, Dr. Anthony Smith, Superintendent to determine whether the record supports a finding of one or more violations.

Based on staff's review, we found the following:

- A Public Service Announcement is defined in WAC 390-05-525 as a communication that has all seven characteristics listed in the rule. The announcement concerning Sabrina Parnell receiving The Bridge-Builder Pin award fails to meet the definition of a PSA because it was not "Designed to benefit or promote the community's health, safety, or welfare or nonprofit community events." In addition, arrangements for the communication were not made at least six months before Ms. Parnell became a candidate.
- The Bridge-Builder Pin award began in 1997 and has been given to 221 recipients, including students, volunteers, non-profit organizations, employees, and school board directors. The application form is available to the public on the District's website.

- While recipients of the award have averaged just over nine per year, there were six recipients during 2017, 2018, 2019, and 2020. There was no District-wide communication concerning the last six recipients. However, one of the 2016 recipients received a District-wide communication. All current school board directors have received The Bridge-Builder Pin award in the past.
- All recipients receive a Bridge-Builder Pin, the Bridge-Builder poem, and a copy of the nomination form. All recipients become part of the public record through the Board's meeting agenda and minutes. At times, when the recipient is a student, school staff, or school-based volunteer, a school principal may send out a school-specific announcement. Some recipients ask the District to not publicize their award outside of the District's agenda. District-wide communication of the award has been largely dependent on the availability of the District's Director of Communications. Occasionally, as in Ms. Parnell's case, the District has provided additional coverage of the award for the community. The District communicated Ms. Parnell's award using its newsletter, website, Facebook page, and email system.
- The Nomination Form for Sabrina Parnell was received May 23, 2021. It was submitted by The Riverview School District Board of Directors, Dr. Anthony Smith, Superintendent, the Executive Assistant to the Superintendent, and two student representatives to the Board. Generally, near the end of the school year, the District reaches out to the community, District Administration, and Board Members to see if anyone has a person they want to nominate. The District stated its Administrators took no consideration of Ms. Parnell's upcoming election when deciding to give her The Bridge-Builder Pin award.
- When the District receives a Bridge-Builder Pin Nomination, it processes the award for the next regular Board meeting. Ms. Parnell received The Bridge-Builder Pin award at the Board's May 25, 2021 meeting.
- Dr. Anthony Smith, Superintendent, made the decision to approve the nomination of Sabrina Parnell. The District stated all nominations since at least 2001 have been approved.
- Michael Ward, the District's Director of Communications, was planning to attend the May 25, 2021 meeting for another purpose, and because he normally covers awards, public information, and graduations, he wrote the story covering Ms. Parnell's award.

Based on these findings, staff has determined that in this instance, the use of Riverview School District facilities to highlight Sabrina Parnell receiving The Bridge-Builder Pin award while she was a candidate for re-election to the School board does not amount to a violation warranting further investigation.

PDC staff is reminding Riverview School District Officials, Dr. Anthony Smith, Superintendent, about the importance of not using District facilities in a manner that could result in assisting the campaign of an individual seeking election to public office. Although staff did not find evidence the nomination of Sabrina Parnell for The Bridge-Builder Pin award in May 2021 was done for the purpose of assisting her 2021 campaign for re-election to the Riverview School Board, staff will encourage District officials to postpone such awards in the future to a time when the individual being honored is not a candidate for public office. PDC staff expects in the future that District officials will be careful to use the facilities of Riverview School District in accordance with PDC laws and rules.

Based on this information, the PDC finds that no further action is warranted and has dismissed this matter in accordance with RCW 42.17A.755(1).

If you have questions, you may contact Phil Stutzman at 360-664-8853, toll-free at 1-877-601-2828, or by e-mail at pdcc@pdcc.wa.gov.

Sincerely,

Electronically Signed Philip E. Stutzman

Phil Stutzman
Compliance Officer

Endorsed by,

Electronically Signed Kim Bradford

Kim Bradford
Deputy Director
For Peter Lavallee
Executive Director

cc: Riverview School District Officials, Dr. Anthony Smith, Superintendent