

**SUNSHINE LAW POLICY OF
THE HOUSING AUTHORITY OF THE CITY OF JEFFERSON**

1. It is the policy of the Housing Authority of the City of Jefferson that its meetings, records, votes, actions and deliberations shall be open to the public in accordance with the Missouri Sunshine Law (Sections 610.010, et seq., RSMo) unless otherwise provided or authorized in the Sunshine Law or in other applicable law.

2. The Executive Director of the Housing Authority shall be the records custodian of the Authority. The Executive Director shall appoint another employee who shall serve as records custodian in his absence and make the identity and location of the alternate records custodian available to the public upon request.

3. The Executive Director of the Housing Authority may provide that access to public records must be requested on designated request forms. Request for access to public records shall be acted upon as soon as possible but shall be approved or denied no later than the third business day following the request. The records custodian may respond to the request in any one of the following ways:

- a. Approve immediate access to the public records;
- b. Approve access to the public records but at a later time; or
- c. Deny access to the public records.

4. If access is not permitted immediately, the records custodian shall give a detailed explanation for the cause of the delay. The records custodian shall also give the place and

earliest time and date the records will be available. The delay may exceed three business days from the date the decision to approve access is made, but only for a reasonable cause.

5. If access to the records is denied, the records custodian shall indicate the basis for the denial on the written request. A copy of the denial shall be provided to the person seeking access to the records, if requested by that person, at no charge. The denial of access to the requested records shall be provided no later than the third business day following the request for the records.

6. Original records may not be removed from the offices of the Jefferson City Housing Authority without the prior written approval of the records custodian.

7. Fees, including the cost of staff time and document search and duplication, may be charged for copying public records in accordance with applicable law. Payment of these copying fees may be requested prior to making the copies.

8. Each meeting of the Housing Authority and of any committees or entities of the Housing Authority which are regulated by the Sunshine Law shall be preceded by notice of the meeting which states the date, time, place and tentative agenda of the meeting. This notice shall be placed in a prominent place in the Housing Authority office that is easily accessible to the public and marked for that purpose. The notice shall also be made available to any representative of the news media who requests notice of a particular meeting.

9. Notice of a meeting shall be posted and given at least twenty-four (24) hours in advance of the meeting. If, for good cause, giving twenty-four (24) hours' advance notice is impractical or impossible, notice shall be given as soon as is reasonably possible.

10. Meetings shall be held at a place reasonably accessible and at a time reasonably convenient to the public unless that is impractical or impossible. All reasonable efforts shall be made to grant special access to the meeting to handicapped or disabled individuals.

11. If it is necessary to hold a meeting on less than twenty-four (24) hours' notice, or at a place not reasonably accessible to the public, or a time not reasonably convenient to the public, the nature of the good cause justifying the departure from the normal requirements shall be stated in the minutes of the meeting.

12. All public votes shall be recorded.

13. Certain records, meetings and votes may be closed by the Housing Authority in accordance with the exceptions to closed meetings and records detailed in Section 610.021, RSMo, or in other provisions of law. Only the portion of the meeting space necessary to house the members of the Board in the closed session shall be closed to the public, and members of the public shall be allowed to remain to attend any subsequent open session held following the closed session.

14. Notice of closed discussions shall be included in the required meeting notices. The notice of a closed meeting or vote shall include the reason for closing the meeting or vote and a reference to the Sunshine Law provisions authorizing the closing.

15. The name of each member and the vote cast on the decision to close the meeting or vote shall be recorded in the minutes. The reason for closing a meeting or vote and the statutory reference authorizing the same shall be announced publicly.

16. When a record, meeting or vote is closed by action of the Housing Authority, the vote or public record shall, if it is required by the statutory exception itself, be made public within the time set out therein.

17. The recording by audiotape, videotape, or other electronic means of any open meeting shall be allowed. The executive director may establish guidelines regarding the manner in which such recording is conducted so as to minimize disruption to the meeting. No audio recording of any meeting, record, or vote closed pursuant to the provisions of section 610.021 shall be permitted without permission of the Board.

18. Any member of the Board who transmits any message relating to public business by electronic means shall also concurrently transmit that message to the custodian of records in the same format. The provisions of this section shall only apply to messages sent to two or more members of that Board so that, when counting the sender, a majority of the body's members are copied. Any such message received by the custodian shall be a public record subject to the exceptions referenced above.

19. All Housing Authority records on the following subjects shall be closed records and shall not be opened or disclosed except as that may specifically be required by the Sunshine Law or as any of them may specifically be excepted from this policy by Board action:

a. Legal actions, causes of action or litigation involving the Housing Authority and any confidential or privileged communications between the Housing Authority or its representatives and its attorneys;

b. Leasing, purchase or sale of real estate by the Housing Authority, in any capacity, where public knowledge of the transaction might adversely affect the legal consideration therefor;

b. Hiring, firing, disciplinary or promoting of particular employees by the Housing Authority when the records contain personal information about the employee;

d. Welfare cases of identifiable individuals;

e. Specifications for competitive bidding;

f. Sealed bids and related documents until all bids are opened, and sealed proposals and related documents or any documents related to a negotiated contract until a contract is executed or all proposals are rejected;

g. Individually identifiable personnel records, performance ratings or records pertaining to employees or applicants for employment;

h. Records which are protected from disclosure by law;

i. Confidential or privileged communications between the Housing Authority or its representatives and its auditor, including all auditor work product;

j. Existing or proposed security systems and structural plans of real property owned or leased by the Housing Authority;

k. Records that identify the configuration of components or the operation of a computer, computer system, computer network or telecommunications network which would allow unauthorized access to or unlawful disruption of that equipment or those systems of the Housing Authority; and

l. Credit card numbers, personal identification numbers, digital certificates, physical and virtual keys, and access codes or authorization codes that are used to protect the security of electronic transactions involving the Housing Authority.

REQUEST FOR RECORDS

Name: _____
Address: _____
Telephone: _____

I request from the Housing Authority of the City of Jefferson, Missouri, the following documents for review:

- ☐ I request copies of these records.
☐ I do not request copies of these records.

I understand that I am responsible to pay the necessary fees incurred in searching for these records and in any duplication of the records that I request.

Date: _____ (Signature) _____

RESPONSE TO REQUEST FOR RECORDS

- ☐ Access to the requested records is authorized for immediate review.
☐ Access to the requested records is authorized for _____ at
(Date)

(Place)

- ☐ Access to the requested records is not immediate for the following reasons or reasons:
☐ Access to the requested records is denied. The records are closed pursuant to the following provisions of the Missouri Sunshine Law:

- ☐ Legal actions or confidential or privileged communications (Section 610.021(1))
☐ Real estate transactions (Section 610.021(2))
☐ Hiring, firing, discipline or promotion of personnel (Section 610.021(3))
☐ Non judicial mental or physical health proceedings (Section 610.021(5))
☐ Scholastic records (Section 610.021(6))
☐ Welfare cases of identifiable individuals (Section 160.021(8))
☐ Software codes (Section 610.021(10))
☐ Specifications for competitive bidding (Section 610.021(11))
☐ Sealed bids or proposal (Section 610.021(12))
☐ Individually identifiable personnel records (Sections 610.021(13))
☐ Other closed records laws (Section 610.021(14))
☐ Other: _____

Date _____ JEFFERSON CITY HOUSING AUTHORITY

By: _____