

ONTONAGON COUNTY RURAL ELECTRIFICATION ASSOCIATION

Administrative Policy No. 900-1

Date: August 27, 2019

CORPORATE TRANSPARENCY POLICY AND INFORMATION REQUEST PROCEDURE

The Ontonagon County REA strives to be open and accountable, making relative information accessible to its members. The REA also encourages members, employees, or others with concerns about any aspect of the governance of the REA to come forward. Members have requested additional transparency with respect to the manner in which the REA Board of Directors (the Board) conducts business.

While the REA strives to provide transparency, the REA also strives to protect confidential information that, if disclosed, could cause harm to the organization, its members, employees, or contract partners, and to eliminate unnecessarily duplicative and cost-prohibitive requests for information and documents. As discussed at the 2019 Annual Meeting, and as previously determined and memorialized in Board of Directors Resolution 3-2015, disclosing information as to member lists, records as to personnel, contractual agreements, and communications with legal counsel, would result in harm to the REA, its members, employees, or contract partners.

The Board of the REA has determined that the best way to reconcile these two conflicting goals is to create a clear and concise procedure for requesting information.

INFORMATION REQUESTS

Members can request information about the REA that is not otherwise published and available to the members. The REA will comply with these requests wherever possible and will use reasonable efforts to respond within 30 working days. All requests must be in writing by U.S. Mail or hand delivery to the REA offices and must contain the following information: name and signature of the requesting individual; member number; district the individual resides within; the requested information; and purpose for the request. The Board of the REA will evaluate these requests and determine whether providing the requested information will cause harm to the REA or its members, employees, or contract partners, whether the purpose of the request is valid, and also whether the request is unnecessarily duplicative and cost prohibitive.

In those instances where the REA determines that disclosure would cause it harm or cause harm to its members, employees, or contract partners, the harmful information will be redacted before the disclosure is made. In some instances, none of the information requested will be disclosed due to potential harm. The REA will not provide information that is unnecessarily duplicative and cost prohibitive. Where information is redacted or is otherwise not provided, the REA will provide a written explanation as to why the request was denied.

The REA has received requests from members for the nominating petitions for the elections of the Board. Starting with the election of June 20, 2020, redacted petitions will be published on the REA's website not less than 15 days before the Annual Meeting. All information that would otherwise disclose members' identities will be redacted, with the exception of member numbers, to protect the privacy of individual members.