



MEMORANDUM

To: Board of Directors

From: Brittany Chavez, General Manager

Date: October 15, 2026

Subject: Policy Handbook Legal Review and
Proposed Dress Code Update

This memorandum summarizes the focused legal review of the proposed District Policy Handbook and presents recommended revisions to the dress code for administrative and office employees.

Background and Scope of Legal Review

Following review by the policy committee consisting of President Gorke, Director Tolbert, and the General Manager, the proposed handbook was submitted to Christina M. Pritchard of White Brenner LLP for a focused legal review. The review prioritized material legal concerns, compliance requirements, and significant liability risks, particularly within the District's employee discipline procedures.

The following policies were the primary subjects of legal review:

- Policy 3105—Voluntary Demotion and Non-Disciplinary Reassignment: Voluntary placement safeguards, accommodation considerations, and employee rights.
- Policy 3110—Paid Administrative Leave: Employee availability requirements, periodic review of continuing leave, and applicable employee protections.
- Policy 3115—Personnel Investigations: Investigation procedures, representation rights, and Firefighters Procedural Bill of Rights Act requirements.
- Policy 3120—Disciplinary Action: Grounds for discipline, notice and response procedures, administrative appeals, and hearing procedures.
- Policy 3150—Employee Grievance Procedure: The relationship between grievances and disciplinary appeals, including the appropriate procedure for each.

Status of Legal Review

Counsel provided the initial focused review on September 18, 2026. Staff submitted proposed revisions for follow-up review on September 23. On October 14, counsel provided three additional recommendations concerning administrative appeal eligibility and predisciplinary

procedures under Policy 3120, and employee availability during administrative leave under Policy 3110.

Staff has incorporated these latest recommendations into the policy text to address the concerns identified in counsel's October 14 correspondence.

The legal review was limited in scope and does not constitute a comprehensive legal review or blanket approval of every provision in the proposed handbook. The policies and sections identified above were the subjects of the focused review and related follow-up correspondence.

Additional Proposed Update—Policy 3200, Dress and Appearance

The Board's current direction requires office and park staff to wear District logo shirts. Staff recommends modifying this requirement for office employees to allow business-casual attire with a District-issued name tag during work hours. Office employees could voluntarily purchase District-approved logo shirts through the District's approved vendor and wear them as part of their regular work attire.

This change would maintain a professional appearance and clear identification while reducing recurring District expenses for office staff logo apparel. Park staff would continue to wear required District logo shirts. Fire Department uniform requirements would remain governed by the applicable policies and Memorandum of Understanding.

Staff proposes the following revisions to Sections 3200.2, 3200.3, and 3200.5. The remaining sections of Policy 3200 would remain unchanged. These proposed revisions were not included in the focused legal review described above.

Proposed Section 3200.2—Job-Appropriate Appearance

Employees and volunteers shall maintain a clean, neat, and professional appearance appropriate to their assigned duties, work environment, safety needs, scheduled activities, and interaction with the public. Clothing shall be clean, in reasonable repair, and suitable for the work being performed.

Administrative and office employees shall wear business-casual attire and a District-issued name tag while on duty. Appropriate business-casual clothing includes collared shirts, blouses, sweaters, slacks, chinos, professional dresses or skirts, and clean footwear suitable for the assignment. District-approved logo shirts may also be worn as provided in Section 3200.3.

Clothing shall provide appropriate coverage and permit the employee to perform assigned duties safely. Clothing intended primarily for sleep, beachwear, visibly torn or excessively distressed clothing, and clothing displaying obscene, unlawfully harassing, or discriminatory content are not appropriate for routine office duties.

The General Manager may authorize different attire or an alternative means of identification when appropriate for field work, maintenance, training, community events, emergency assignments, or an identified safety concern.

Appearance standards shall be based on legitimate safety, operational, identification, sanitation, or public-service needs and shall not be based on stereotype or personal preference unrelated to the work. All requirements are subject to Section 3200.9.

Proposed Section 3200.3—District Uniforms and Logo Apparel

An employee or volunteer assigned a District uniform shall wear the authorized uniform while on duty or representing the District unless a supervisor authorizes different attire for the assignment. Park staff shall wear District-approved logo shirts while on duty unless different attire is authorized for the assignment.

Administrative and office employees shall not be required to wear District logo shirts. They may voluntarily purchase approved logo shirts through the District's approved vendor and wear them in place of other business-casual shirts. A District-issued name tag shall be worn whether the employee chooses business-casual clothing or an approved logo shirt.

The General Manager may authorize business attire, field clothing, event clothing, plain clothes, or other job-appropriate attire when it better serves the assignment.

Only authorized uniforms, insignia, badges, patches, nameplates, rank markings, and District logos may be worn or displayed as representing the District. A person shall not wear a District uniform or logo apparel in a manner that falsely suggests the person is on duty, holds a rank or authority not assigned, or speaks for the District without authorization.

Fire Department uniform classes, insignia, and operational specifications may be established in the Fire Department Policy Manual and any applicable Memorandum of Understanding, consistent with this policy.

Proposed Section 3200.5—Uniform Issuance and Cost

The General Manager shall determine the authorized quantity, class, specifications, vendor, replacement cycle, and issuance method for required uniforms and District-approved apparel, consistent with this policy and any controlling agreement.

Administrative and office employees ordinarily shall wear their own business-casual clothing. The District shall provide the name tags required by this policy.

Office employees who choose to purchase optional District logo shirts shall purchase them at their own expense through the District's approved vendor. Such purchases are voluntary and are not a condition of employment. These employee-purchased shirts remain the employee's

property and are not subject to return upon separation. Their use remains subject to the authorized-use requirements of this policy.

The District shall provide required logo shirts for park staff and other required uniform items through direct issuance, an approved vendor, an authorized allowance, or reimbursement of an approved purchase. Purchases and reimbursements require advance authorization. The District shall pay or reimburse the cost and maintenance of required uniforms when required by law, a Memorandum of Understanding, an employment agreement, or District policy.

District-issued uniforms, name tags, badges, insignia, and logo apparel remain District property unless the General Manager expressly designates an item as the recipient's property. Return at the end of District service is governed exclusively by Policy 3180.

Requested Board Direction

Staff recommends that the Board receive this update regarding the focused legal review and provide direction on incorporating the proposed revisions to Sections 3200.2, 3200.3, and 3200.5 into the final handbook for adoption.