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Chapter 9 Web Logs (BLOGs) on Service Web Sites

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9.1 What is the purpose of this chapter? This chapter establishes policy on the proper use and management of Web logs, also known as "blogs," hosted on Fish and Wildlife Service (Service) or Service-sponsored, publicly-accessible Web servers.

9.2 What is a blog?

- **A.** A blog is a Web site where the blog author enters comments as he/she would for a journal or a diary. A typical blog focuses on a specific topic and may combine text, images, and links to blogs and other Web content related to the topic. The first recognized blogs appeared on the Web in 1997.
- **B.** In the early days of blogging, the communication direction was typically one-way. The blog author would provide entries into the blog, and the blog's audience would read them. Most blogs now feature a comment function that allows readers to share their comments on the topic with the blog's author and other visitors to the blog. The blog author may respond to comments or allow the blog comment section to function as a forum for continued discussion among visitors.

9.3 Why does the Service need a policy on blogs?

- **A.** There are many benefits to operating a public blog on a Government Web site. There are also risks, including potential legal liabilities.
- (1) As informal as blogs are meant to be, if they appear on a Government Web site, they are official Government communications and we must treat them as such.
- (2) Soliciting, accepting, and posting comments raises issues including privacy, information collection, and censorship.
- (3) Managers of blogs that allow comments must guard against malicious code and other security threats.
- (4) Blogs produce large volumes of records that we must properly manage.
- **B.** This policy helps us to:
- (1) Control blog content to ensure that it is in keeping with the mission and reputation of the Service;
- (2) Meet the expectations of blog visitors with content that is regularly updated and of consistently high quality;
- (3) Retain blog content according to relevant records schedules (see section 9.15.);
- (4) Protect the rights of citizens participating in blogs, including privacy rights; and
- (5) Ensure that software and hardware we use to operate blogs conform to established security, accessibility, and other relevant standards.

9.4 What is the scope of this chapter?

- A. This chapter applies to blogs on Service Web sites that the public can access, including:
- (1) Web sites we manage on Service Web servers, whether the Office of Information Resources and Technology Management (IRTM) or another Service office or program maintains them;
- (2) Web sites we build in partnership with other Federal and non-Federal organizations; and
- (3) Web sites, or blogs on Web sites, that we manage on servers we do not maintain.

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- **B.** This chapter does not apply to:
- (1) Internal blogs that only Service employees can access. Internal blogs must still conform to accessibility, security, records management, and other relevant laws and Web policies. (The Service may develop additional policies for internal blogs.)
- (2) Blogs employees establish on their own time that are unrelated to Service business. Employees must comply with Departmental restrictions on the personal use of Government computers (see 410 DM 2).
- (3) Blogs the Service neither manages nor maintains, but where employees provide content as recognized Service representatives.
- **9.5 What questions should a blog manager ask before requesting approval for and launching a blog?** Managing a blog successfully places a big responsibility on those who maintain it. Before a prospective blog manager seeks approval to establish a blog, he/she must consider the following questions and create a blog management plan to address them:
- A. What is the outreach objective for this blog?
- **B.** Why is a blog an effective way of achieving this objective?
- **C.** Do these objectives warrant the cumulative expense of maintaining the blog (providing content and reviewing and posting visitor comments, etc.) over the course of its expected lifespan?
- **D.** Who are the blog authors?
- E. What is the process for reviewing blog authors' posts?
- **F.** Will the blog accept and post comments from blog visitors?
- **G.** What is the process for reviewing and posting or not posting visitor comments in a timely manner?
- **H.** Will the blog author(s) respond through the blog to visitor comments? (If so, those responses must adhere to the review and authorization process covering initial blog postings.)

9.6 What is the approval process for establishing a blog?

- **A.** Service offices should only establish a blog if the blog will address a business need and after fully considering the anticipated costs of managing the blog.
- **B.** Prospective blog managers should work closely with their supervisors to review the questions in section 9.5. and develop a blog management plan (see section 9.6C).
- **C.** Prospective blog managers must complete a blog management plan before requesting a blog account. You can get a template of a blog management plan from your Web Council representative. A blog management plan helps ensure that the blog operates efficiently and achieves its outreach objectives.
- **D.** After completing a blog management plan, the blog manager must get approval for the blog. The blog manager must:
- (1) Consult with his/her Web Council representative and External Affairs office for guidance, including any additional Region- or program-specific requirements.
- (2) Get approvals in accordance with Region- or program-specific requirements.

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- (3) Send a blog account request following established procedures for requesting Web accounts. (See the Web Standards Handbook, section 1.3.2, which is available on the Intranet.)
- **E.** If the blog will not use blog software or hardware that IRTM maintains, the blog manager must address all Information Technology (IT) security and records management concerns associated with the blog. (See section 9.10 for security requirements.)
- **F.** The Service Web Council approves or declines to approve the blog account according to established procedures for approving Web account requests. If the Web Council does not approve the blog account, the appropriate Web Council representative will work with the blog manager to try to resolve outstanding issues.
- **G.** Once the Web Council approves the blog account, the blog manager must agree to:
- (1) Work in consultation with the appropriate Web Council representative when creating the blog site;
- (2) Identify the Service blog author with each blog entry;
- (3) Link to and follow the Service blog comment policy for acceptance and display of blog comments (see section 9.9);
- (4) Include the proper privacy, Freedom of Information Act (FOIA), and disclaimer notices on the site;
- (5) Meet any additional IRTM and Region- or program- specific requirements; and
- (6) Operate the blog according to the blog management plan.
- **9.7 What reporting requirements does the Service have once we approve a blog account?** Before we activate a blog, the National Web Manager must:
- **A.** Report the creation of the blog to the Assistant Director External Affairs and the Assistant Director IRTM.
- **B.** Notify the Department of the Interior Office of the Chief Information Officer (OCIO), through the Departmental Web Manager, about the blog, in accordance with OCIO Directive 2007-006. The notice must include:
- (1) Purpose of the blog,
- (2) Proposed blog Web address (URL), and
- (3) Point of contact (blog manager) information.
- 9.8 What are the requirements for blog content?
- **A.** Any content we post to a Web site that the Service manages, maintains, hosts, or sponsors is an official Government publication and must comply with all applicable Federal laws and policies, including Web standards. As with all Web content, Regional Directors and Assistant Directors are responsible for all blog content within their management areas.
- **B.** Fish and Wildlife Service employees who contribute to Service blogs are speaking as representatives of the Service. Employees must fairly and accurately reflect the positions and views of the Service and must not interfere with our primary mission.

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- **C.** Blog content that employees provide must meet Service standards for information quality. Service guidelines for information quality are available on the <u>Service Web site</u>.
- **D.** Personal remarks, even on topics that are not directly related to work for the Service, reflect on the Service and its reputation.
- (1) Blog authors must comply with established ethics guidance such as the Department's *Ethics Guide for DOI Employees* article on "Use of Government Property, Time, and Information."
- (2) Authors may express professional opinions that differ from existing Service policy or position only if the author clearly identifies the opinion as his/her own and not that of the Service.
- (3) Blog authors must not misstate or denigrate official Service positions.
- **E.** Blogs are intended for the informal exchange of ideas and not as a means to solicit or accept official comments on Service proposed rulemaking. Blog managers must:
- (1) Ensure their blog avoids any appearance of being an official channel for comments used as part of a rulemaking process; and
- **(2)** Not promote the submission of such comments to the blog and, when appropriate, instruct citizens who want to leave comments about <u>Federal Register</u> notices to do so using the process described in the <u>Federal Register</u> notice itself.
- **F.** Blog managers must not post content that is materially relevant to issues under active litigation without the prior approval of the Assistant Director External Affairs or the appropriate Assistant Regional Director External Affairs.
- **G.** Blog authors must not mention commercial entities, products, services, or other nongovernmental organizations or individuals in a way that directly or indirectly implies an endorsement or disapproval of those entities.
- **H.** Blogs must be predictable, reliable, and dependable.
- (1) Once a blog manager establishes a blog, he/she should maintain a regular schedule for new blog author postings of at least once a week.
- (2) Blog managers must review and post comments received from the public within 1 business day of receipt.
- (3) If we establish a blog to support a specific project, study, or other time-limited activity, blog authors should alert the blog's visitors of the limited lifespan of the blog. When the project or study is complete, the last blog entry must clearly indicate that the blog is closed and the date blog entries were ended.
- **I.** Service blogs must be a forum for open and respectful discourse.
- (1) Service blogs should be open to a variety of perspectives, but participants should treat each other, as well as the Service and its employees, with respect.
- (2) The blog manager or his/her designee must review comments received before posting them for public viewing.
- (3) Blog managers may only post those comments that adhere to the provisions of the "Blog Policy Statement" (see section 9.9).
- (4). The blog manager must include a link to the Service Blog Policy Statement page (see section 9.9).

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9.9 What is the Service's Blog Policy Statement page? Blog managers who allow visitors to post comments for public view must link their blogs to the general page that describes Service policy for posting blog comments. Figure 9-1 shows the Blog Policy Statement page:

Figure 9-1: Blog Policy Statement

U.S. Fish & Wildlife Service Blog Policy Statement

We welcome your participation in this blog. Please read the following statement before submitting comments.

In order to participate, you do not need to provide, and we prefer that you do not provide, your full name or any other personally identifying information such as email address or phone number. Do not give us any information you do not want to share with all blog visitors.

So that we can measure visitation to this blog, we may capture anonymous information such as the IP address of your internet connection, but we will not link this information to specific comments or blog participants. Please see our Privacy Statement for more information.

This is a moderated blog. We will review all comments before we post them and will not post comments that do not comply with this blog policy.

We will not post comments that contain:

- vulgar, offensive, threatening, or harassing language;
- threats against the Government, its employees, or other citizens;
- content that violates the privacy of another individual; or
- promotions of commercial products or services.

Comments should be related to the posted topic; off-topic comments may not be posted.

Statements made in this blog, either by you or by us, will in no way constitute a legal or official notice from, or comment to, the Fish and Wildlife Service or any official or employee of the Fish and Wildlife Service for any purpose.

Reporters should send questions to the Office of External Affairs through their normal channels and should not submit questions here.

This blog will operate during normal business hours (9:00 a.m. to 5:00 p.m., local time), Monday through Friday. We will review comments submitted after hours or on weekends the next business day for posting.

Any references that we make to commercial entities, products, services, or other nongovernmental organizations or individuals is solely for the information of people using this blog. Such references are not an official or personal endorsement of any product, person, or service, and may not be quoted or reproduced for the purpose of stating or implying Fish and Wildlife Service endorsement or approval of any product, person, or service.

We may amend or modify this blog policy statement at any time to ensure its continued use is consistent with the blog's intended purpose as a limited forum.

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9.10 What are the IT security requirements for blogs?

- **A.** Any Service-sponsored blog, including those not hosted on a Service-controlled server, must follow Service Web standards, including security standard 2.1.4 from the *Web Standards Handbook*.
- **B.** Blog managers hosting a blog on an outside server:
- (1) Must work with IRTM to assess the ramifications of a potential security breach, and
- (2) May have to obtain certification from IRTM that their blog content is adequately protected.
- C. To protect IT resources, blogs must:
- (1) Not allow the insertion of malicious code through attachments of any kind;
- (2) Limit blog comments to text only (no attachments). (They may include Web addresses, but not "clickable" links to other Web sites.);
- (3) Impose a character limit for comments to prevent attempts to overload the system with excessive content; and
- (4) Activate other security safeguards IRTM identifies to prevent activities that might threaten IT resources.

9.11 What are the privacy and information collection requirements for blogs?

- **A.** The Paperwork Reduction Act requires Federal agencies to limit collection of information from citizens and to receive approval from the Office of Management and Budget (OMB) for information collection. Service blogs provide a forum for citizen input, but unless the blog manager has specific OMB approval, a Service blog must not use blog entries to:
- (1) Survey or solicit information from blog visitors, or
- (2) Require visitors to provide information as a prerequisite to submitting blog comments.
- **B.** Blog software must not require blog visitors to log in before leaving comments, unless the blog manager intends to use the login to limit participation to specific people.
- **C.** We may collect IP addresses, browser information, and similar data as part of regular server logs and Web site visitation analysis (in accordance with <u>Service and Departmental Privacy policy</u>). If so, we will use the information only in aggregate and will not link it to specific blog content over time.
- **9.12** What FOIA considerations should employees understand before establishing a blog or posting comments on it? Blog content becomes part of the public domain when it is posted. We cannot refuse to release its content if we receive a FOIA request.

9.13 What are the accessibility requirements for blogs?

A. Blogs must conform to the requirements of section 508 of the Rehabilitation Act. Blog content and the blog's Web interface must be accessible to those with disabilities. If a blog manager uses blog software that IRTM has not provided and does not maintain, then the manager must ensure that the form fields are appropriately labeled so that screen readers can interpret them and people can navigate the blog using keyboard (non-mouse) commands.

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B. To prevent "spam" attacks against blog sites, many blogs require blog visitors to perform some action before submitting comments to demonstrate that an actual person is submitting the comment and not an automated system. Any system we employ to prevent automated postings (e.g., any "human verification system") must conform to the requirements of section 508.

9.14 What are the copyright law requirements for blogs?

- **A.** Copyrighted content that blog managers post must conform to Service Web standards (see the *Web Standards Handbook*, section 2.1.2). Regardless of the format, content that employees produce when performing official duties is in the public domain.
- **B.** Blog managers should not knowingly post for public view any copyrighted material submitted as a blog comment unless they note that they have permission from the copyright holder to use the content.

9.15 What are the requirements for records management?

- **A.** Blog content, whether posted by the blog manager or by others commenting on the blog topic, is a Federal record and we must manage it as such.
- **B.** The current schedule generally allows us to capture and retain these records under the following categories:
- (1) General correspondence, and
- (2) Public comment reports.
- **C.** The longest applicable records retention generally is 10 years. For ease of records management, for blogs on Service servers, we will use IRTM software to save each entry and comment for 10 years unless we are directed to do otherwise.
- **D.** For a blog that is not on a Service server or cannot use the IRTM software for some other reason, it is the responsibility of the blog manager to maintain records as required.

9.16 What happens if a blog manager does not comply with Service blog requirements?

- **A.** Web Council representatives may revise Web pages when necessary to comply with Service and Departmental policy or to correct inaccuracies or inappropriate content (see the Service's Web Council Charter for more information).
- **B.** The National Web Manager, in consultation with the Assistant Directors of External Affairs and IRTM, may revise, suspend, or close any active blog that has not been properly approved or does not comply with this policy.

/sgd/ Bernard Mazer ACTING DEPUTY DIRECTOR

Date: April 10, 2009

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