Center for Technology in Government

Designing Social Media Policy for Government: Eight Essential Elements

Jana Hrdinová
Program Associate
jhrdinova@ctg.albany.edu
(518) 442-3983
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University at Albany

Agenda

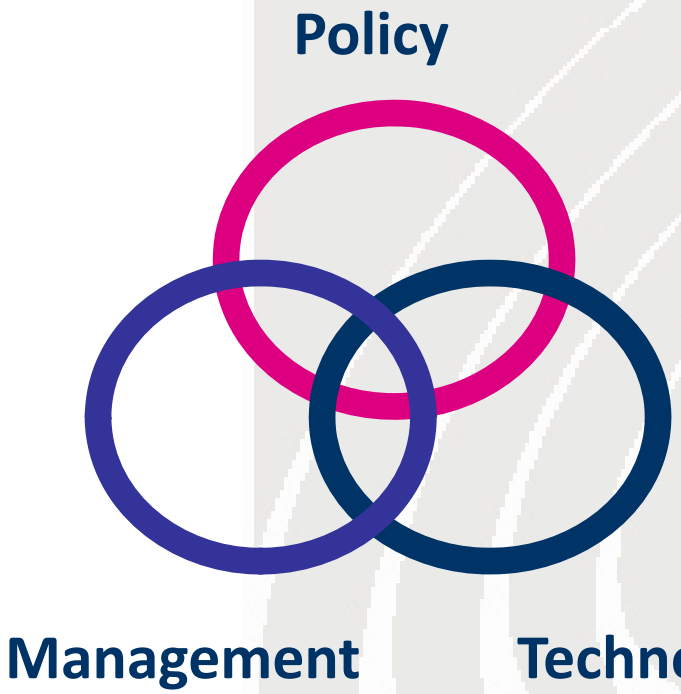
- Introduction
- Why do governments need a social media policy
- Three uses of social media in government
- Policy components

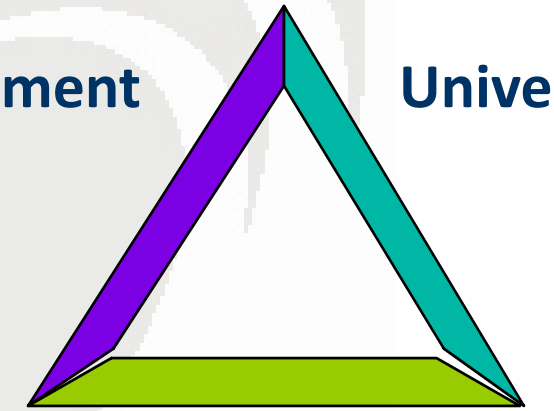
CTG mission

- The mission of the Center for Technology in Government at the University at Albany is to foster public sector innovation, enhance capability, generate public value, and support good governance.

- We carry out this mission through applied research, knowledge sharing, and collaborative problem solving at the intersection of policy, management, and technology.

Our focus and partners





Exploratory Social Media Project

Phase 1

Government workshops

(July 2009 – Oct 2009)

2 workshops with over 65 state and local government professionals

Phase 2

Environmental scan & interviews

(Nov 2009 – May 2010)

32 government professionals

1 federal agency

2 state entities

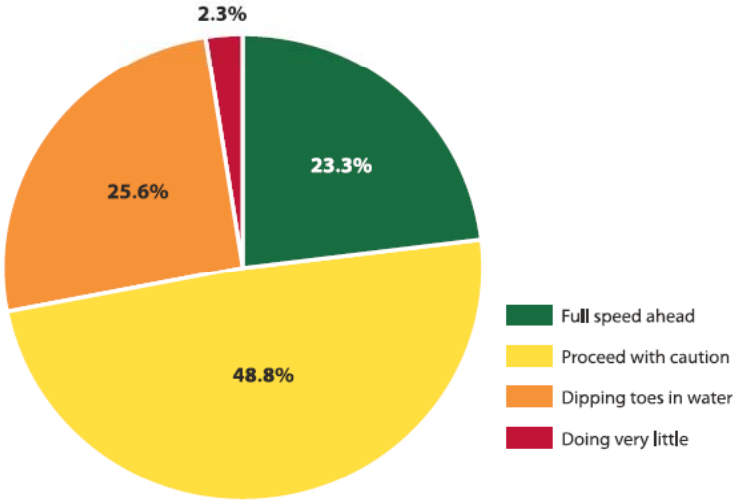
3 local governments

7 state agencies

Review of 26 government social media policies and guidelines

Use of social media in government

Figure 11: How would you characterize the current status or implementation of social media initiatives in your state?



Retrieved from: NASCIO Friends, Followers, and Feeds: A National Survey of Social Media Use in State Government September 2010 http://www.nascio.org/publications/surveys.cfm (10/2010)

"As of July 2010, we identified that 22 of 24 major federal agencies had a presence on Facebook, Twitter, and YouTube."

Challenges In Federal Agencies' Use of Web 2.0 Technologies - Statement of Gregory C. Wilshusen, Director Information Security Issues

GAO
Accountability * Integrity * Reliability

Why do governments need a social media policy?

- Inform and educate employees
- Set internal and external expectations
- Define proper use and procedures
- Prevent problems from happening in the first place
- Establish and maintain legitimacy

Three Uses of Social Media in Government

Boundary issues & challenges

Issues	Challenges
• Simultaneous engagement in professional and personal uses	• Monitoring employee use is more difficult
	• Difficulty in coordinating agency message
• Linked up personal and professional identities	• Legal issues connected to employees' right to privacy and free speech
• Permanency of social media content	• Change in organizational culture and business processes

Eight Essential Elements

Access

Access policy delineates who and under what conditions can access social media tools from a government-owned network or device.

Access strategies:

- Open access without restrictions
- Access based on function or role within an agency
- Access based on selected sites or tools

Example of access policy

Sample language for requesting access

"All social media requests must be submitted in the form of a business case to the Deputy County Executive for Information, who will then consult with the E-Government Steering Committee. If approved, agencies must fill out and have an agency director sign the Procedural Memorandum 70-05 Revised: Request for Waiver/ Exemption Form and return it to the Information Security Office in the Department of Information Technology"

~Fairfax County, VA

Account management

Account management encompasses the creation, maintenance, and destruction of social media accounts.

Account management:

- Account opening protocol
- Guidance on maintenance of log-on information of existing account and employees with access
- Account closing guidance
- Password guidance

Example of account policy

Sample language outlining multiple approvals needed to create a social media account

"There should be an authorization process for employees wishing to create an account for the benefit of the agency, with the agency Public Information Officer (PIO) as the authority to oversee and confirm decisions. In this role, the PIO will evaluate all requests for usage, verify staff being authorized to use social media tools, and confirm completion of online training for social media.

PIOs will also be responsible for maintaining a list of all social networking application domain names in use, the names of all employee administrators of these accounts, as well as, the associated user identifications and passwords currently active within their respective agencies.

~ State of North Carolina

Acceptable use

Acceptable use policies outline how employees are expected to use agency resources, restrictions on use for personal interests, and consequences for violating the policy.

Acceptable use:

- Most of the policies reviewed use references to existing policies regarding usage of government-owned resources
- Most agencies address acceptable use of social media tools for personal reasons, but with the increasing popularity of these tools, agencies will need to start addressing professional use as well

Lee Landor, who had been the deputy press secretary to Manhattan Borough President Scott Stringer since May, posted comments on her Facebook page criticizing Mr. Gates and the president, whom she referred to at one point as "O-dumb-a." It appears she made the postings on government time (suggesting it was done from a government computer).

~Bruce Maiman, Populist Examiner

Example of acceptable use policy

Sample language for addressing acceptable use of social media sites for personal use while at work.

"Employees should follow regulations and policies according to the City's Email and Electronic Communication Acceptable Use Policy. Some aspects of that policy that relates to employees' use of social media/networking resources include the following: …

2. Use of the City-provided Internet Email and Lotus Notes is a privilege. Unauthorized use will result in the loss of access for the user and, depending on the seriousness of the infraction, may result in disciplinary action as deemed appropriate.

3. Employees should recognize that there are restrictions and limitations to use of the Internet and its related technologies. There is a limited amount of personal use that is understood and permissible, but employees should be as conservative as possible in such personal use and understand that public records laws may bring their use under scrutiny by the media and public."

~ City of Chandler, AZ

Employee conduct

Employee conduct addresses what is “right” and “wrong” in terms of employees’ behavior when engaging with social media tools or on social media platforms as an employee of a particular agency.

Employee conduct:

- Existing rules of conduct
- Blurry line between personal and professional
- Balancing employees’ right to free speech and privacy and protecting agency integrity
- Usage of disclaimers on personal postings

Examples of employee conduct policy

Sample language outlining employee conduct expectations when using social media

A summary of the key points of ethical Social Media conduct are reproduced below:
i. Customer protection and respect are paramount.
ii. We will use every effort to keep our interactions factual and accurate.
iii. We will strive for transparency and openness in our interactions and will never seek to "spin" information for our benefit.
iv. We will provide links to credible sources of information to support our interactions, when possible.
v. We will publicly correct any information we have communicated that is later found to be in error.
vi. We are honest about our relationship, opinions, and identity.
vii. We respect the rules of the venue.
viii. We protect privacy and permissions.

~ State of Delaware

Sample language outlining disclaimer use for employees

If you publish to a Website outside the State, please use a disclaimer something like this: "The postings on this site are my own and do not necessarily represent the State of Utah's positions, strategies, or opinions."

~ State of Utah

Content

Content policy delineates procedures for publishing official agency information on official agency social media sites.

Content considerations:

- Strategies vary from centralized control to light editorial oversight over employee postings
- Content policy does not have to set detailed protocol for whole agency, but can simply direct departments to create and abide by a set protocol
- Content policy versus content guidelines

Example of content policy

Sample language concerning content management

"Agencies are responsible for establishing, publishing, and updating their pages on social media sites. Although it will be the agency's responsibility to maintain the content, the Office of Public Affairs will monitor the content on each of the agency pages to ensure 1) a consistent countywide message is being conveyed and 2) adherence to the Social Media Policy. The Office of Public Affairs also reserves the right to direct agencies to modify social media content based on best practices and industry norms."

~Fairfax County, VA

Security

Security policy outlines security procedures employees have to follow when using social media tools.

Security considerations:

- Behavioral versus technical issues
- Employee education
- Fast pace of technological changes
- Some policies utilize existing security policies for Internet use, others are more specific to social media environment

Example of security policy and resources

Sample language outlining security processes to follow:

Agency IT Administrators shall:

1. Limit Internet access Social Media web sites according to the agency's acceptable use policy, while allowing authorized Users to reach content necessary to fulfill the business requirements. Limitations may include: ....

b. Allowing Internet access to Users who are specifically authorized.

c. Preventing unnecessary functionality within Social Media web sites, such as instant messaging (IM) or file exchange.

d. Minimizing and/or eliminating the addition of web links to other web sites, such as "friends", to minimize the risk of exposing a government user to a link that leads to inappropriate or unauthorized material.

2. Enable technical risk mitigation controls to the extent possible. These controls may include:

a. Filtering and monitoring of all Social Media web site content posted and/or viewed.

b. Scanning any and all files exchanged with the Social Media web sites.

~ State of California

Secure Use of Social Media
Published by New York State Office of Cyber Security
http://www.cscic.state.ny.us/lib/policies/documents/Cyber-Security-Guideline-G10-001-Social-Media-V1.pdf

Guidelines for Secure Use of Social Media by Federal Departments and Agencies
Published by US Federal CIO Council
http://www.cio.gov/Documents/Guidelines_for_Secure_Use_Social_Media_v01-0.pdf

Social Media and Security
Published by Massachusetts Executive Office for Administration and Finance, under its Social Media Guidance and Best Practices website.
http://www.mass.gov/?pageID=afsubtopic&L=7&L0=Home&L1=Research+%26+Technology&L2=Information+Technology+Services+%26+Support&L3=Application+Services&L4=Mass.Gov&L5=Social+Media+Guidance+%26+Best+Practices&L6=Social+Media+and+Security&sid=Eoaf

Building A Modern Security Policy For Social Media and Government
Presentation
http://www.slideshare.net/rybolov/building-a-modern-security-policy-for-social-media-and-government

Social media Security Mitigations
Published by US Center for Disease Control.
http://www.cdc.gov/socialmedia/Tools/guidelines/pdf/securitymitigations.pdf

Legal issues

Legal issues connected to agency and employee use of social media tools.

Legal considerations:

- Policy environment has not caught up to technology
- Policies reviewed took two approaches – make reference to users abiding by existing laws or detail specific laws to abide by
- Issues that seem to be most pressing:
  - Terms of Service
  - Records management
  - Freedom of speech
  - Citizen privacy

Example of policy addressing legal issues

Sample language outlining specific laws and impact

"All City of Hampton social networking sites shall adhere to applicable state, federal and local laws, regulations and policies including all Information Technology and Records Management City policies and other applicable City policies.

...

3. Freedom of Information Act and e-discovery laws and policies apply to social media content and therefore content must be able to be managed, stored and retrieved to comply with these laws.

4. City of Hampton social networking sites are subject to Library of Virginia's (LVA) public records laws. Relevant City of Hampton and (LVA) records retention schedules apply to social networking content. Records required to be maintained pursuant to a relevant records retention schedule shall be maintained for the required retention period in a format that preserves the integrity of the original record and is easily accessible using the approved City platforms and tools.

5. All social network sites and entries shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure.

6. Content submitted for posting that is deemed not suitable for posting by a City of Hampton social networking moderator because it is not topically related to the particular social networking site objective being commented upon, or is deemed prohibited content based on the criteria in Policy –Item 9. of this policy, shall be retained pursuant to the records retention schedule along with a description of the reason the specific content is deemed not suitable for posting."

~ City of Hampton, Virginia

Resources for legal issues

Social media legal resources

State of Massachusetts Legal Guidance Toolkit
Published by Massachusetts Executive Office for Administration and Finance, under its Social Media Guidance and Best Practices website.
http://www.mass.gov/?pageID=afterminal&L=6&L0=Home&L1=Research+%26+Technology&L2=Information+Technology+Services+%26+Support&L3=Application+Services&L4=Mass.Gov&L5=Social+Media+Guidance+%26+Best+Practices&sid=Eoaf&b=terminalcontent&f=itd_portal_services_social_media_legal_toolkit_abstract&csid=Eoaf

State of New York Legal 2-Kit
Published by the New York State CIO/OFT Empire 2.0 Center for Excellence.
http://www.empire-20.ny.gov/legal_toolkit

Report on Federal Web 2.0 use and Record Value
Published by National Archives and Records Administration about usage of social media tools by federal government and implications for records management.
http://www.archives.gov/records-mgmt/resources/web2.0-use.pdf

Records Advisory – Preliminary Guidance on Social Media
Published by New York State Archives.
http://www.archives.nysed.gov/a/records/mr_social_media.shtml

Web2.0 and Accessibility
Published by NYS Forum IT Accessibility Work Group
http://www.empire-20.ny.gov/sites/default/documents/whitepaper.pdf

GSA Social Media Handbook
Published by the United States General Services Administration. Provides guidance for federal agencies on applicable federal legal issues.
http://www.gsa.gov/graphics/staffoffices/socialmediahandbook.pdf

Social Media Guidebook: A guide for the use of social media sites by local governments.
Published by the Greater Metro Telecommunications Consortium (GMTC), which is a Colorado-based intergovernmental agency comprised of local government representatives who work together on telecommunications issues.
http://www.gmtc.org/reg_auth/2010_GMTC_Social_Media_Guidebook_%28Final%29_%282%29.pdf

Citizen conduct

Citizen conduct refers to setting protocols for the appropriate conduct of citizens on an official agency social media site and how will inappropriate conduct be handled.

Citizen conduct:

- Existing rules of conduct
- Guidelines address issues such as offensive language, political endorsements, trademark material
- Rules pertain to who is responsible for monitoring and reviewing citizen input

Example of policy addressing citizen conduct

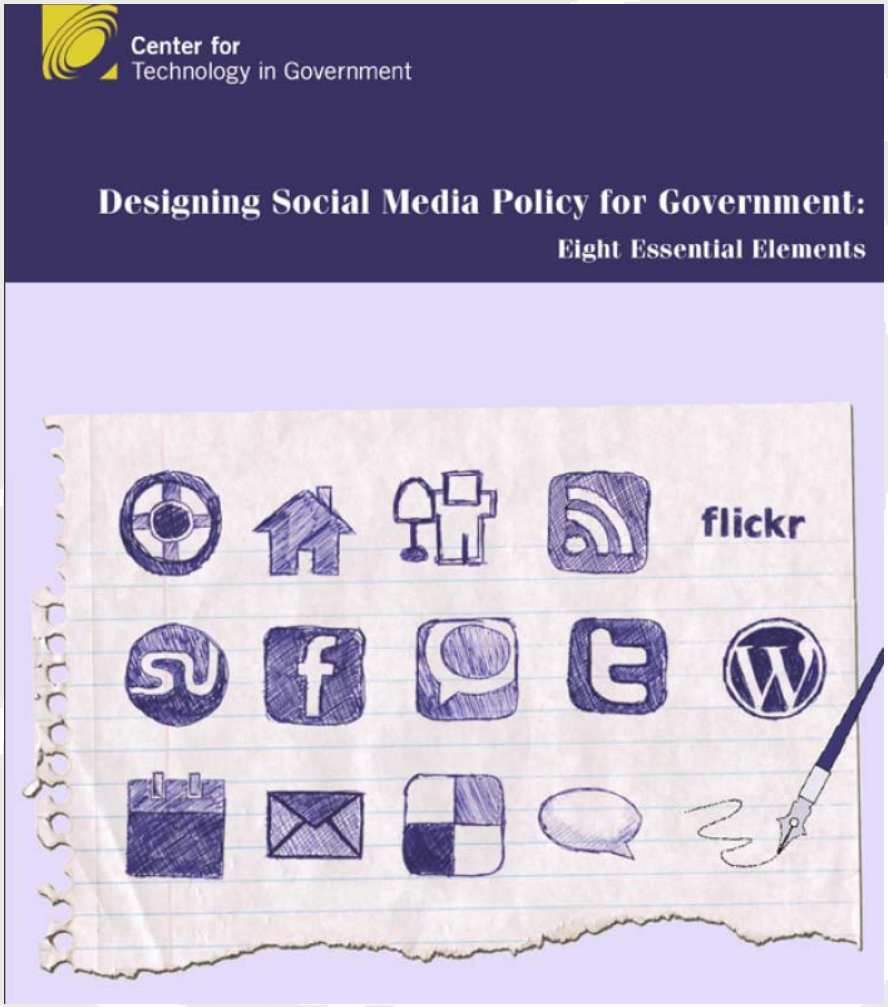
Sample language outlining the preferred conduct of citizens

"Users and visitors to social media sites shall be notified that the intended purpose of the site is to serve as a mechanism for communication between City departments and members of the public. City of Seattle social media site articles and comments containing any of the following forms of content shall not be allowed:

a) Comments not topically related to the particular social medium article being commented upon;
b) Comments in support of or opposition to political campaigns or ballot measures;
c) Profane language or content;
d) Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation;
e) Sexual content or links to sexual content;
f) Solicitations of commerce;
g) Conduct or encouragement of illegal activity;
h) Information that may tend to compromise the safety or security of the public or public systems; or
i) Content that violates a legal ownership interest of any other party.

These guidelines must be displayed to users or made available by hyperlink. Any content removed based on these guidelines must be retained, including the time, date and identity of the poster when available (see the City of Seattle Twitter, Facebook and CityLink standards)."

~ City of Seattle, Washington



http://www.ctg.albany.edu/publications/guides/social_media_policy/social_media_policy.pdf

OCIO Office of the DOT Chief Information Officer

DOT Social Media Policy Development

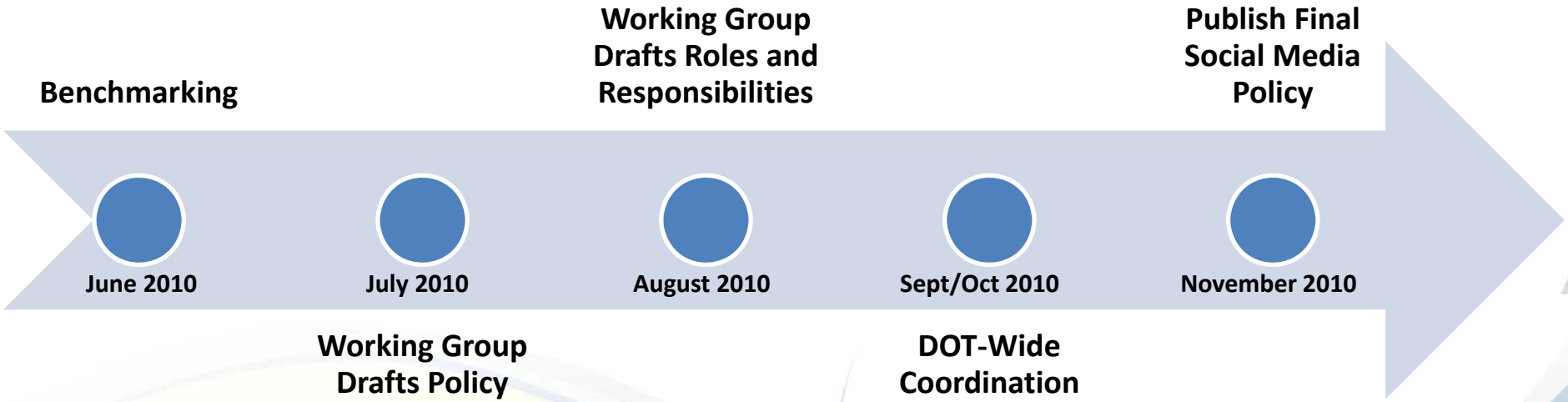
April 2011

Agenda

- Approach
- Benchmarking
- Policy Development
- Moving Forward

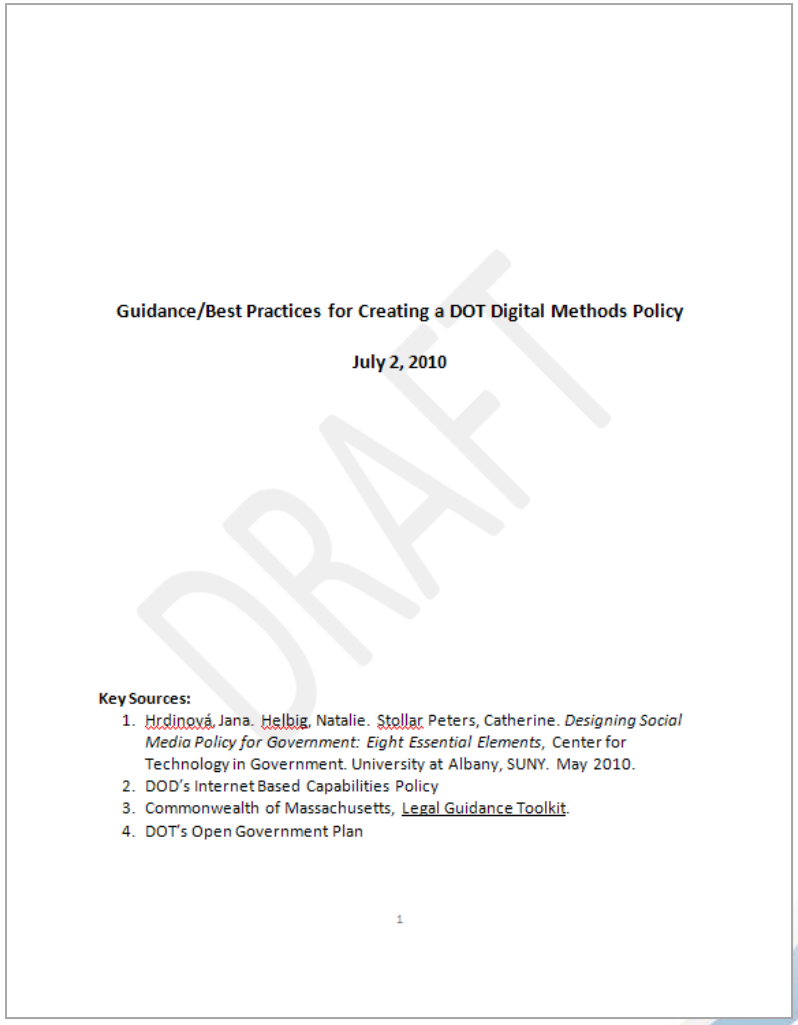
DOT's Approach to Developing a Social Media Policy

- DOT's Open Government Plan imposed a Fall 2010 deadline for the DOT to develop its first social media policy
- The total time to develop the policy was 6 months
- An interdisciplinary working group of 30 DOT employees participated



Benchmarking

- The DOT Open Gov Team began with a survey of existing social media policies and programs, including:
  - CTG Study
  - State Department
  - DOD
  - EPA
  - GSA
- This survey resulted in a framework that would guide the discussions of the Social Media Policy Working Group



Guidance/Best Practices for Creating a DOT Digital Methods Policy

July 2, 2010

DRAFT

Key Sources:

1. Hrdinová, Jana. Helbig, Natalie. Stollar Peters, Catherine. *Designing Social Media Policy for Government: Eight Essential Elements,* Center for Technology in Government. University at Albany, SUNY. May 2010.
2. DOD's Internet Based Capabilities Policy
3. Commonwealth of Massachusetts, Legal Guidance Toolkit.
4. DOT's Open Government Plan

1

Benchmarking Activities

- Define personal use, professional use and official use
- Determine what would be in scope of the CIO Policy
  - The location for the policy would be within the IT policy chapter of the DOT, thus not all issues were appropriate to address here
- Assign responsibility for developing draft policy statements in several key areas:
  - Should employees have access to social media sites at work? (Employee access)
  - Who should be permitted to maintain social media accounts and how should we manage that? (Account management)
  - What use of social media is considered acceptable at work, both from the resource and restrictions on personal interest point of views? (Acceptable use)
  - How are employees expected to behave on social media sites and what are the consequences of misbehaving? (Employee conduct)
  - Who is allowed to develop and post content on social media sites and who is responsible for ensuring accuracy, security, privacy and confidentiality? (Content)
  - To what extent will the department manage the technology and behavioral security risks associated with social media use? (Security)
  - Will the department allow these sites to include citizen feedback (two-way communication? (Citizen conduct)
  - Which laws apply to social media use? (Legal issues)
  - What social media sites should be approved for employee access? (Acceptable apps)

Drafting Policy Statements

CIOP Social Media Policy Covers

Employee Access
- Official Use
- Professional Use
- Personal Use

Acceptable Use
- All Use

Account Management
- Official Use
- Professional/ Personal Use

Citizen Conduct
- Professional/ Personal Use

Security
- All Use

Acceptable Apps
- Official Use
- Professional Use
- Personal Use

Legal
- Official Use
- Professional/ Personal Use

Content
- Official Use
- Professional Use
- Personal Use

Citizen Conduct
- Official Use

Employee Conduct
- Official Use
- Professional/ Personal Use

General Counsel led the drafting of policy statements

Public Affairs led the drafting of policy statements

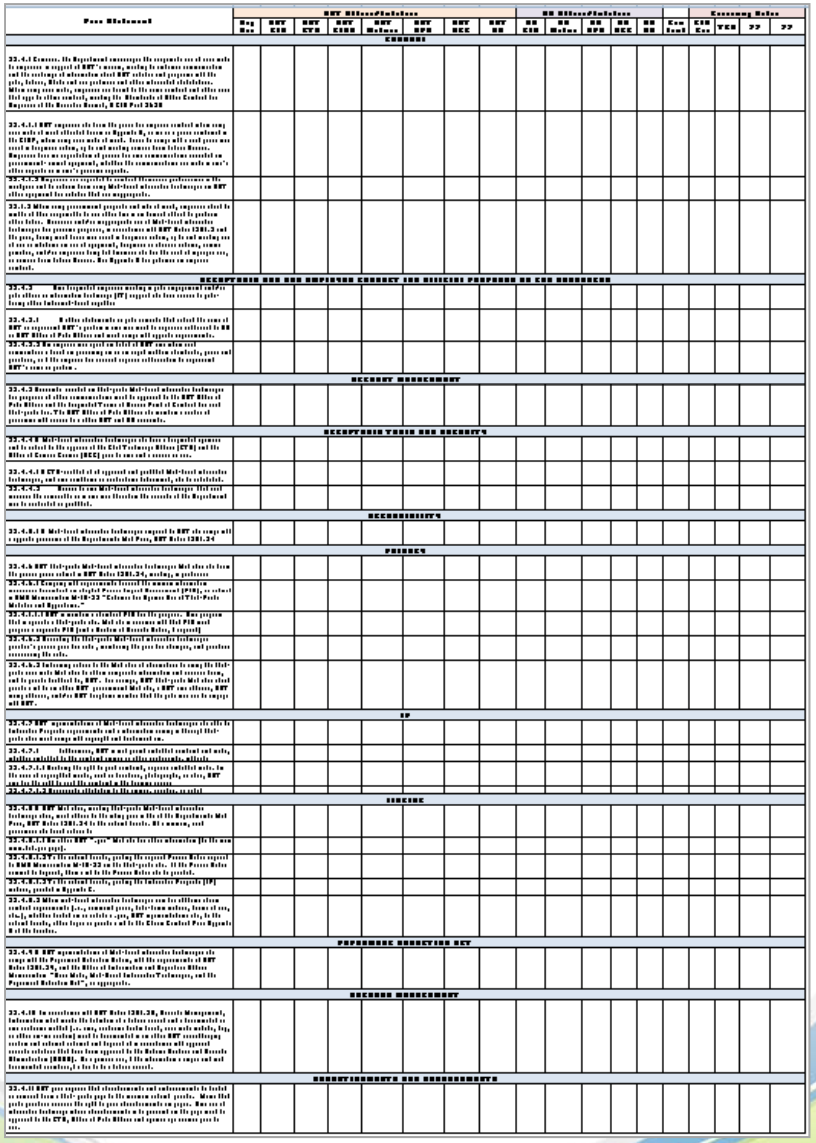
Social Media Policy Working Group Drafted

OCIO led the drafting of policy statements

OCIO Office of the DOT Chief Information Officer

Drafting Roles and Responsibilities

- The Working Group used a Responsible, Accountable, Consulted, Informed (RACI) Matrix to determine what individuals, offices and governance bodies would oversee each policy statement
- Responsible parties spanned the OCIO (CISO, CTO, ACIO for Policy Oversight), General Counsel, Public Affairs, Human Resources, and the modal equivalents of those offices
- These roles and responsibilities were then included in the draft policy



Coordinating Policies in the DOT

Duration: Flexible

Round 1 Review

- Reviewed by Subject Matter Experts during policy development
- Includes early review by security & privacy experts

Duration: Two Weeks

Round 2 Review

- Reviewed by stakeholder CIOs
- Includes expert review from legal, Section 508 compliance, etc.

Duration: Two Weeks

Round 3 Review

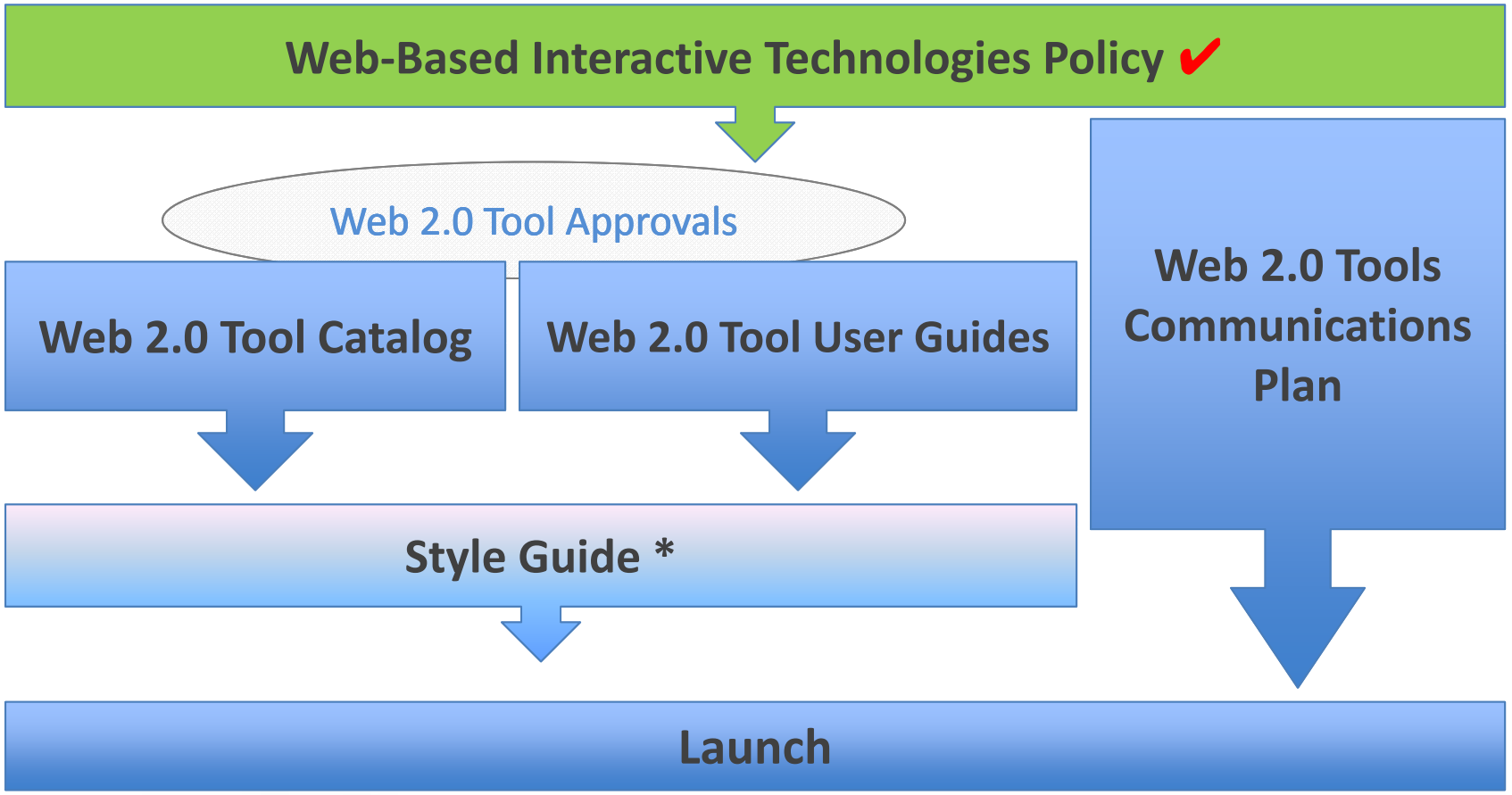
- Formal coordination through DOT Administrators and Secretarial Officers
- Only three options available
  - Concur without comment
  - Concur with comment
  - Non-concur

Upon completion of reviews, DOT CIO performs final review and signs

Summary of DOT Social Media Policy

- Covers all DOT Employees
- Specifies an approval process for official accounts
- Lists specific account management requirements
- Requires an approved tools list to be developed by the OCIO
- Requires tool specific guidance to be developed separately—the policy covers high level requirements for records management, accessibility, PRA, intellectual property, advertisements, etc…
- Contains several appendices:
  - Employee conduct
  - Standardized citizen conduct policy (terms of use for external sites)
  - Standardized intellectual property and privacy notices
  - Legal authorities and guidance

Moving Forward



The development of the policy was the foundational activity upon which training, communications, and tool guidance will be created.

IT Catalog

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