

Interim Guidance 831-2

DATE: February 24, 2010

SUBJECT: Rules of Behavior for Using Web 2.0 and Social Media Web Sites and Responsibilities for Content Management

TO: Departmental/Office Heads, Staff Directors, et. al., Administrative Officers, Administrative Contacts

Purpose of this transmittal memo. This transmits Interim Guidance 831-2, Rules of Behavior for Using Web 2.0 and Social Media Web Sites and Responsibilities for Content Management.

Explanation of changes. Contact information for implementing and managing web 2.0 and social media sites is updated. Additional information is provided about the Terms of Service (ToS) agreement processes (see pars. 9 & 10). Records management guidance is expanded (see par. 18).

Effective Date. This guidance is effective date of signature.

Contact information. You may direct questions about this interim guidance to [name of contact person] in room [number], [name of building]; at [telephone number]; by fax at [fax number]; or by e-mail at [e-mail address].

Director
Policy and Planning Staff

Attachment

INTERIM GUIDANCE 831-2
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TO: Departmental/Office Heads, Staff Directors, et. al., Administrative Officers, Administrative Contacts

1. What is the purpose of this interim guidance?

This interim guidance provides guidelines for appropriate behavior when communicating on web 2.0 sites, provides information to agency staff members and contractors regarding their responsibilities for managing content on an agency web 2.0 presence, and designates the agency's Digital Strategy and Services Staff as the office to contact on these matters.

2. What are the authorities for this interim guidance?

- a. 5 U.S.C. § 301, Departmental Regulations (January 8, 2008), which provides that the head of an executive agency may prescribe regulations for the use of the agency's property;
- b. Pub. L. 104-06, The Clinger-Cohen Act of 1996;
- c. Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794(d)), and The Workforce Investment Act of 1998, which included the Rehabilitation Act Amendments of 1998, enacted on August 7, 1998;
- d. Pub. L. 105-277, Government Paperwork Elimination Act of 1998;
- e. OMB Circular A-130 (Revised, Transmittal Memorandum No. 4), "Management of Federal Information Resources;"
- f. OMB M-00-13: Privacy Policies and Data Collection on Federal Web Sites, June 22, 2000; and
- g. Presidential Memorandum of January 21, 2009 (Transparency and Open Government).

3. To whom does this guidance apply?

- a. Guidance for implementing and managing web 2.0 technologies and social media sites applies to personnel who have been assigned the roles of content/product owner, content author, content/project manager, and/or content/site moderator. (See Part 1.)

b. Guidance for appropriate behavior when communicating on web 2.0 and social media sites applies to all agency employees, interns, volunteers, and detailees (referred to as agency “staff” or “staff members”), and contractors who access these sites. (See Part 2.)

4. What are the general principles governing agency web 2.0 and social media sites?

a. Staff members and contractors represent the agency in multiple and varied ways. Social media, as newer forms of interaction, allow for communication in real time with customers, whether they are Federal agencies or members of the public. These interactions provide a new source of information about the agency and its mission.

b. Content created by agency staff and contractors must comply with Federal and agency-specific guidelines and policies. No prohibited information may be posted, whether to an agency or external site (e.g., another government agency, educational, not-for-profit, or commercial site).

c. Agency staff members and contractors also use social media tools as a way to communicate and collaborate internally. In internal communications, staff members and contractors must comply with agency-specific behavioral guidelines and directives. Federal agency employees also must comply with the *Standards of Ethical Conduct for Employees of the Executive Branch* and applicable agency guidance.

d. All information posted by agency staff and contractors on agency web 2.0 or social media sites is subject to monitoring. If content is found to be non-compliant with Federal and agency-specific guidelines and policies, and is hosted on an agency web site, the content will be taken down until corrections have been made. If the information is hosted on an external site, the individuals who are responsible for the content will take down the information until corrections have been made.

5. Definitions

a. **Approved agency-sponsored social media site.** An agency web 2.0 presence approved by the Digital Strategy and Services Staff and hosted on an agency-owned server.

b. **Approved external social media site.** An externally-hosted social media application where the agency has negotiated a specific terms of service (ToS) agreement for an agency web 2.0 presence.

c. **Professional activities.** For Federal agency employees, interns, volunteers, detailees, and contractors, those professional activities that: are characterized by specialized knowledge or academic preparation, are related to work responsibilities, and improve the “state of the art,” or provide for an individual’s career development.

d. **Social media and web 2.0.** Social media and web 2.0 are umbrella terms that define the various activities that integrate technology, social interaction, and content creation. Social media use the “wisdom of crowds” to connect information in a collaborative manner online. Through social media, individuals or collaborations of individuals, create, organize, edit or comment on, combine, and share web content. Social media and web 2.0 use many technologies and take many forms, including: RSS and other syndicated web feeds, blogs, wikis, photo-sharing, video-sharing, podcasts, social networking, social bookmarking, social voting, mashups, widgets, virtual worlds, micro-blogs, and more.

Part 1 -- Guidance for implementing and managing web 2.0 and social media sites

6. What are the roles and responsibilities for implementing and managing web 2.0 technologies and social media sites?

a. **Content/product owner --** The departmental/office head or program director responsible for an approved web 2.0 or social media site or product, such as a blog or a YouTube channel.

- (1) Selects the content/project manager.
- (2) Approves the content authors and content/site moderators speaking on behalf of the agency.
- (3) Obtains funding resources, if needed, for approved web 2.0 technologies and social media sites.

b. **Content author --** An agency staff member or contractor who has been given the authority to speak on behalf of the agency in an official capacity or as a subject matter expert.

- (1) Posts content on an agency-sponsored or an approved, externally-sponsored social media site, after having been pre-approved to do so. Without prior approval from the content/product owner or appropriate manager, content authors may **not** disseminate official statements or nonpublic information or offer an official interpretation of agency policy or practices.
- (2) Follows comment policies for the specific site and adheres to the agency's policies for participating in web 2.0 and social media sites. If an external site is used, management of content is also subject to the policies and guidelines of the host site.
- (3) Reports any inappropriate content or behavior to the content/site moderator.

c. **Content/project manager --** Responsible for working with the agency's Digital Strategy and Services Staff and other appropriate departments/staffs (e.g., policy/planning, legal counsel, records management, information technology [IT] services, and IT security) to coordinate the development and implementation of a web 2.0 technology or social media site.

- (1) Resolves issues about record status and content presentation. Content presentation elements include the look and feel of the agency's presence, and the coordination, development, and evaluation of designs and content against design, usability, and accessibility standards.
- (2) Provides ongoing feedback to the content/product owner regarding the status of the project and reports any change in requirements to the agency's Digital Strategy and Services Staff.

d. **Content/site moderator --**

- (1) Ensures that feedback (comments) do **not** violate the purpose and policies of the site. When technically feasible, the moderator reviews and approves comments to the site.
- (2) Updates the site on an agreed-upon schedule (daily, weekly, monthly, etc.) and checks the site frequently to see if responses are needed.
- (3) Monitors the content to identify changes in record status.
- (4) Reports any inappropriate content or behavior to the agency's Digital Strategy and Services Staff.

7. How can content authors avoid providing information that is in conflict with official agency information?

Follow the guidance outlined in the agency directive regarding content rules and requirements for agency-hosted and externally-hosted web sites. In using agency web 2.0 sites and external sites, you must ensure that the information you post does **not** conflict with official agency information. Appropriate content criteria can be found in the agency's Web Content Rules and Requirements Directive.

8. Can content authors respond to the media (press, etc.) through agency web 2.0 sites?

Contacts with media sites must follow policy in the agency's Media Relations Directive and must involve coordination with the public affairs department/staff.

9. What is the approval process for establishing agency web 2.0 or social media projects?

Any new web 2.0 or social media projects should be reviewed by your departmental/office head and submitted to the agency's Digital Strategy and Services Staff via e-mail. Use the attached document (Web 2.0 and Social Media Project Proposal) for submitting proposals for new web 2.0 and social media projects. The Digital Strategy and Services Staff will review the proposals and determine which projects are in the best interests of the agency based on mission, available resources, and other priorities. When necessary, the Digital Strategy and Services Staff will bring forward issues to senior management.

10. Once my office has an approved account on a social media site like Twitter, am I permitted to use some of the tools or add-ons that are available on these sites?

The answer depends on whether the application has a ToS agreement separate from the agreement that the agency signed with the original provider. Twitter has a number of separate applications or services developed by the public that have similar names and seem to imply that they were created by Twitter. Things like twitterfeed.com (a service that uses an RSS feed to update your Twitter status) or TwitPic (which allows photos) are not owned or developed by Twitter and may have a different ToS agreement that the agency's legal counsel has not reviewed or approved. If you see something you might want to use, please contact the agency's Digital Strategy and Services Staff via e-mail so that the agreement can be evaluated. Do **not** add applications or services to a social media site without prior approval.

Part 2 -- Guidelines to agency staff and contractors for appropriate behavior when communicating on any web 2.0 sites

11. May agency staff and contractors access web 2.0 and social media sites for personal use during the work day?

Yes, per, the agency's directive, Appropriate Use of Agency Office Equipment, agency staff and contractors are authorized to use agency office and IT equipment during non-work time so long as the use does **not** interfere with official business, unduly burden the system, or involve inappropriate uses described in the directive.

Security risks are a part of the social media environment, just like they are with e-mail (for example, spam or viruses in attachments) and the Web in general. Use common sense and be aware that some hackers use social media sites and software applications ("apps"), like games and quizzes, to "phish" for information or spread malware. Ensure that your use of social media complies with the agency's Appropriate Use Directive. By way of reminder, all agency staff and contractors are required to complete annual IT security and awareness training, as per the agency's IT Security Directive.

12. What are inappropriate uses specific to accessing web 2.0 and social media sites during work time?

The agency's Appropriate Use Directive lists the following inappropriate uses:

- a. Using agency office equipment (e.g., e-mail, facsimile machines, letterhead) to transmit a personal endorsement of any product, service, or enterprise (including professional organizations). The use of agency office equipment to transmit or convey an official endorsement of a product, service, or enterprise, as well as the endorsement itself, must be cleared (see the agency's Administrative Procedures Manual).
- b. Using agency office equipment to make or disseminate official statements or nonpublic information, or to offer an official interpretation of agency policy or practices. The use of agency equipment for these purposes, as well as the statements or interpretations themselves, must be cleared. The use of agency office equipment to unofficially disseminate official statements or information regarding official programs or activities, or personal interpretations of official agency policy or practices, must otherwise be in accordance with law and must expressly distinguish between personal opinion and agency policy and practice, as required by the agency's Administrative Procedures Manual and Appropriate Use Directive.

In a web 2.0 environment, agency staff and contractors **must** be sensitive to the implications of any activities or statements that can be directly linked to their agency affiliation (as employees, interns, volunteers, detailees, or contractors).

13. May I access web 2.0 and social media sites in my professional capacity?

Yes. The agency encourages you to use the internet to accomplish job responsibilities and to further the agency's mission through professional activities and discussions. Accessing web 2.0 and social media web sites for these reasons is an acceptable use. See the agency's Appropriate Use Directive for other examples.

14. If I am contributing to sites in my professional capacity, as an agency representative, do I need to get any content cleared before posting?

In general, if you are acting in an official capacity, representing an agency position, you must have been pre-approved to do so or you work in a job that authorizes you to speak for the agency.

15. May I, as an agency staff member or contractor, express my personal views about issues relating to the agency through web 2.0?

In accordance with the agency's Media Relations Directive, you must **not** express your personal views on issues when speaking for the agency or a particular department, office, or unit. If you are not speaking for the agency, you may generally express your personal views, so long as you do so on personal time, do not divulge nonpublic information, and make it clear that you are speaking as a private citizen. Also, the *Standards of Ethical Conduct for Employees of the Executive Branch* limit Federal employees' ability to use their title or agency affiliation when acting as private citizens.

16. How can I ensure that when I participate in web 2.0 and social media sites, my personal opinions are not mistaken for official comment on behalf of the agency?

- a. In circumstances where your agency affiliation is clearly identified (e.g., your .gov e-mail address) or widely known (e.g., within professional organization web environments), you should use a disclaimer, which you may place near the bottom of your message, clearly stating that you are expressing personal, not official, opinions. One acceptable disclaimer is: “The contents of this message are mine personally and do not necessarily reflect any position of the Federal government or the [name of agency].” As Twitter discussions are limited to 140 characters of text, it is recommended that you identify your content as unofficial in your biographical information if you otherwise use your agency affiliation.
- b. It is your responsibility as an agency staff member or contractor to ensure that you are **not** giving the false impression that you are acting in an official capacity when you use agency office equipment for “non-official” purposes. If there is an expectation that such personal use could be interpreted to represent the agency, then an adequate disclaimer **must** be used.

17. May a Federal employee comment on web 2.0 or social media sites about commercial products or services that he/she has received as a Federal employee?

No. Federal employees must **not** endorse, either directly or by implication, commercial products or services, or policies or activities of an individual or external organization or entity. Federal employees also must **not** include on the agency’s public web sites text or image content that implicitly or explicitly conveys an endorsement of any non-Federal organization or commercial product.

18. How are records created by social media activities maintained under the agency’s Records Control Schedule?

- a. Records created by this interim guidance are in two categories: administrative records (e.g., proposal forms) and social media content.
 - (1) Administrative records created by this interim guidance are currently unscheduled and may **not** be destroyed at this time.
 - (2) Records created and maintained in social media may be covered in the agency’s Records Control Schedule and/or the General Records Schedules and should be managed in accordance with approved dispositions.
- b. Content/project managers, with input from the agency’s records management staff, should assess the “record value” of the content at the proposal stage and determine if they will be creating or maintaining data and/or information that can be identified as

“Federal records,” as defined by 44 USC 3301 and 36 CFR 1222. This assessment should be done periodically as the record value may change over time. Additionally, the content/site moderator should be aware of the record status and report apparent changes to the content/project manager and the records management staff.

19. Whom should I contact regarding this interim guidance?

You may direct questions about this interim guidance to [name of contact person] in room [number], [name of building]; at [telephone number]; by fax at [fax number]; or by e-mail at [e-mail address].