

# Social Media Navigator GSA's Guide to Official Use of Social Media 2018

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#### Introduction

GSA encourages the use of appropriate social media technologies to engage with the public and enhance communication, collaboration and information exchange in support of our mission. This guide covers best practices about the use of social media and social networking at GSA, and applies to technology hosted on internal federal government servers and servers outside the federal government. The Navigator includes:

- Considerations for delivering strategic messaging
- Your responsibilities when accessing social media services
- Guidance around the use of official versus personal accounts
- The processes for creating and maintaining social media accounts
- An explanation around GSA policies and our social media landscape

The information in the Navigator does not supersede or replace existing legal responsibilities and policies in effect, and does not apply to your personal online activities while not on official duty; however, we are always bound by the Standards of Ethical Conduct for Employees of the Executive Branch, the conflict of interest statutes, and the Hatch Act. There are ethical obligations to follow even when we are engaged in our personal capacities, as we will review in this guide. If you have any questions about getting started using social media at GSA, contact GSA's Office of Strategic Communication (OSC) at socialmedia@gsa.gov.

The Social Media Navigator is subject to review and updates to incorporate changes in available technologies and relevant practices and policies.

# **GSA's Social Media Landscape**

Social media isn't just where content is discovered, but where it is shared. GSA is represented on a variety of social media platforms. From leadership, to business lines and even government-wide initiatives housed within GSA - get to know them!

#### Social Media at GSA

 A place where anyone, inside or outside of the agency can learn about GSA's Social Media sites and initiatives. Learn how we use Facebook, Instagram, Twitter, and more to connect with customers and share information to help us better serve the public and fulfill our mission.

# **Before You Begin**

Federal agencies use social media platforms like Facebook and Twitter to engage with the public on a daily basis. While these tools are a good way of extending message reach, they should never be used as a sole means of issuing official agency communications. There is one exception: during crisis situations, GSA may determine that updates via official social media accounts is the best way to keep employees and the public informed about an ongoing situation. Agencies must ensure government information is available and accessible to people without Internet connectivity, so you must provide members of the public who don't have Internet connectivity with timely and equitable access to information. This might mean providing hard copies of reports and forms if requested.

# **Using Social Media to Reach Your Audience**

The use of social media at GSA should be strategic. Here are a few things to consider when requesting a social media account:

# Define your goals for using social media

- Will you be using social media to provide customer service, listen to customers, or communicate to customers?
- How will your account link with traditional GSA media such as press releases or blog posts?

# Identify your target audience

- To "find your customers where they are", have you researched what platforms they use to interact? Keep in mind that social media might not be the right method for reaching them.
- How have others used social media successfully for similar programs?

#### Survey existing social media accounts at GSA

- Official social media accounts are for informing our intended audiences about the great work we do at GSA. Will a new account confuse current audiences? Build new/different audiences?
- How will this account support GSA's mission of providing the best value in real estate, acquisitions and technology?

#### Identify the strategic need for the account

- Does it make sense to create an account or should you leverage GSA's social media presence?
- Have you developed a thoughtful social media strategy or communications plan?

#### Monitor and review your account regularly

- Have you used your account in the way intended?
- Do you use your social media account regularly?
- Are you building up your audience? Is your audience interacting with you on social media?
- What metrics are helping you inform the use of your account?
- Does it make sense to continue this account?

# **Understanding Official vs. Personal Accounts**

#### **Official Accounts**

#### What does official capacity mean?

You are communicating in your official capacity when your supervisor assigns this activity as part of your official duties. Your supervisor should clearly explain the assignment and what social media tool or tools you can use. When you communicate in an official capacity you are communicating on behalf of GSA, just as if you were standing at a podium at a conference, communicating the agency's views to everyone.

#### Accounts used in an official capacity:

Subject to applicable legal authorities, GSA determines the purposes for which its official accounts may be used. Simply put, official accounts are for official purposes. Employees permitted to use official accounts must do so in accordance with applicable agency directives, regulations and policies and any additional instructions from his or her supervisor or the Associate Administrator for the Office of Strategic Communication.

If you are authorized to have an official GSA account using your personal name (ex: @GSAEmily), the official GSA account which utilizes your personal name must be used for official purposes only and in accordance with agency directives, regulations, and policies.

#### **Personal Accounts**

#### What does personal capacity mean?

Personal capacity means you are acting on your own time and representing yourself and not the agency or the US Government. It's important to remember that when you use your social media tools personally, you're not speaking for GSA, and it shouldn't appear to others as though you're speaking for GSA.

#### Accounts used in a personal capacity:

Personal social media accounts, i.e., social media accounts not authorized for official agency use may be established and maintained by employees without authorization from GSA. However, employees must ensure that their personal social media accounts comply with the Standards of Ethical Conduct and other applicable laws, including but not limited to the Hatch Act, the use of the agency's seal, logos, and program names, and the prohibition(s) on disclosing nonpublic information.

Additionally, an employee's personal social media account must not be designed in such a manner where a reasonable person would reasonably believe the employee's personal social media account is an official GSA social media account. The employee may only include his/her official position/title on a social media account if the GSA position/title is one of several biographical details (and not given more prominence than the others) and the employee includes a disclaimer such as "Views expressed are mine alone". A disclaimer on a social media account will not overcome a determination that a social media account appears to be a sanctioned GSA account or an official GSA social media account. Employees' personal social media accounts that are found as appearing to be sanctioned by GSA may be subject to disciplinary action in accordance with applicable agency policies, laws, and regulations. Questions can be referred to the Office of General Counsel.

# Things to Know

# **Comment Policy**

The agency can monitor and remove comments that are political, target specific individuals or groups, are commercial in nature, are abusive or are similarly unacceptable. Contact <u>GSA's</u> <u>Office of General Counsel</u> as situations arise that may require the monitoring or removal of comments posted on or to a GSA social media site.

The views expressed in visitor comments reflect those of the comment's author and do not necessarily reflect the official views of the U.S. General Services Administration or the federal government.

We reserve the discretion to delete or not allow comments that contain:

- Vulgar or abusive language;
- Personal or obscene attacks of any kind;
- Offensive terms targeting individuals or groups;
- Threats or defamatory statements;
- Links to any site;
- Suggestions or encouragement of illegal activity;
- Multiple successive off-topic posts by a single user or repetitive posts copied and pasted by multiple users, or spam;
- Unsolicited proposals or other business ideas or inquiries; or Promotion or endorsement of commercial services, products, or entities. (Note that non-commercial links that are relevant to the topic or another comment are acceptable.)

# Section 508 Standards (Accessibility)

Section 508 of the Rehabilitation Act of 1973, requires that electronic and information technologies purchased, maintained, or used by the federal government meet certain accessibility standards. That means making Web-based content accessible for people with disabilities so they have access to the same information as everyone else. Agencies employing non-federal social media services still must ensure that people with disabilities have equal access to those services. You can use this handy 508 checklist to ensure the accessibility of your content, particularly captioning videos. Contact GSA's Section 508 coordinator if you have questions or complaints.

Resources: Section508.gov

OMB Memo M-06-02 Section 508 Standards

**Federal Acquisition Regulations** 

#### **Endorsements of Products, Services, or Businesses**

You cannot use your government position, title, or any authority associated with your public office to endorse any product, service or business. This restriction applies when you use social media in your official capacity. The use of GSA social media accounts and tools in an official capacity is part of the authority associated with your public office. For example, if you're using social media in your official capacity, you can't post a statement saying "GSA should negotiate a terms of service agreement with Twitter because Twitter is the best platform for public communication." This statement endorses Twitter by stating that Twitter is the "best" platform for communication. However, if you're using social media in your official capacity, you could post a statement such as "GSA just negotiated a terms of service agreement with Twitter.

which will provide GSA with a platform to communicate with the public." This is a statement of fact versus an opinion and an endorsement. Avoid endorsing or appearing to endorse any private interests or nonfederal groups.

#### **Nonpublic Information**

Various laws and regulations may prohibit the disclosure of certain information. The Privacy Act, Procurement Integrity Act [PDF - 173 KB], Freedom of Information Act, National Defense Authorization Act of 2016, Executive Order 13556 Controlled Unclassified Information and Executive Order 13526 Classified National Security Information limit what can be shared with unauthorized individuals. These laws and orders, for example, prohibit disclosure of certain privacy related information, source selection information, contractor proposal information, and classified information. You should not disclose nonpublic information through social media activities. GSA Order PBS P 3490.2 Document Security for Sensitive but Unclassified Building Information (GSA-only link) is a policy to protect sensitive but unclassified (SBU) building information for GSA-controlled space. GSA-controlled space includes owned, leased, and delegated Federal facilities. The Standards of Ethical Conduct for Employees of the Executive Branch prohibits employees from using nonpublic information to further their own or another's private interests, whether through advice or recommendation, or by knowing about an unauthorized disclosure. Nonpublic information is information you receive because of your federal employment that you know, or reasonably should know, has not been made available to the general public and is not authorized to be made available to the public on request.

Some examples of nonpublic information are:

- information covered under the Privacy Act that cannot be released
- classified information
- proprietary information from private-sector vendors or contractors
- information designated as exempt under FOIA
- source selection information on contracts or grants
- sensitive but unclassified information
- confidential business information as defined by federal law
- confidential information designated by the agency

Remember, what is true on the phone, snail mail or email is equally true using social media. If it's not public information, it should not appear on GSA's social media sites.

#### **Records Management**

When you use electronic media, whether it's a blog, a website, email or any other type of electronic communication, know that the regulations that govern proper management, archival and release of records still apply. The National Archives and Records Administration (NARA) offers resources and guidance to agencies to ensure proper records management. Contact records@gsa.gov for questions about records management at GSA. You can also take records management training designed by NARA on <a href="mailto:GSA's DigitalGov University">GSA's DigitalGov University</a>.

Resources: NARA Bulletin 2014-02 - Guidance on managing social media records
NARA - Implications of Recent Web Technologies for NARA Web Guidance
NARA Bulletin 2010-05 - Guidance on Managing Records in Cloud Computing
Environments
OMB Circular A-130

#### **Intellectual Property**

The use and management of social media technologies raises several questions about the legal concepts of copyright, fair use, and intellectual property ownership. Agencies should be diligent to ensure they consider existing intellectual property laws when implementing social media technologies. Government content can sometimes be free from copyright per 17 USC 105, but this is not always true, especially where images are concerned, and especially if the government is using the images under license. In addition, government websites may have names or logos that are protected under trademark law. Thus, content on government websites cannot automatically be assumed to be free of intellectual property rights and available for any individual or site provider wishing to use it.

Social media technologies that allow public contribution of content may also create challenges about the protection of intellectual property contributed by visitors. Agencies must post clear disclaimers detailing the copyrights that nongovernment contributors may retain, and provide clear guidance on the reuse of trademarked phrases or logos. Also, you should post clear disclaimers detailing liability if a member of the public's post violates another's intellectual property. Please note that the GSA StarMark is registered with the U.S. Patent and Trademark Office, and the GSA seal is protected by criminal statute. Contact GSA's Office of General Counsel with specific questions.

Resources: Copyright.gov

<u>U.S. Trademark and Patent Office</u> <u>GSA's Office of General Counsel</u>

Guidance on Using GSA's Branding Images (GSA-only link)

# **Information Quality Standards**

The public places a high degree of trust in dot-gov content and considers it an authoritative source. Under the Information Quality Act, agencies must maximize the quality, objectivity, utility, and integrity of information and services provided to the public. With social media information dissemination products, agencies must reasonably ensure suitable information and service quality consistent with the level of importance of the information. Reasonable steps include: clearly identifying the benefits and limitations inherent in the information dissemination product (e.g., possibility of errors, degree of reliability, and validity); and taking reasonable steps to remove the limitations inherent in the product or information produced. Content creators and agency management should ensure that the agency position, rather than one person's opinion, is reflected in all communications.

#### **Laws for Information Collection**

Agencies must, when practicable, use electronic forms and filing to conduct official business with the public, and social media technologies can be used in many cases to meet this need. Federal public websites must ensure information collected from the public minimizes burden and maximizes public utility. The Paperwork Reduction Act covers the collection of data from the public; it requires OMB approval of all surveys given to 10 or more participants. This includes any sort of survey where identical questions are given to ten or more participants. The exception to the survey rule is an anonymous submission form where users can provide openended comments or suggestions without any sort of government guidance on the content. The Children's Online Privacy Protection Act also has rules about communication and collection of data from people younger than 13. If you have questions about these acts, contact GSA's Office of General Counsel. OMB has approved the use of a fast-track process by agencies for some information collection which can be useful for social media related surveys and questionnaires. Contact GSA's Regulatory Secretariat to learn more.

Resources: Federal Information Collection (OMB)

Children's Online Privacy Protection Act

2010 OMB Memo on Social Media, Interactive Technologies and the Paperwork

**Reduction Act** 

GSA's Office of General Counsel

GSA's Privacy Act Officer (GSA-only link)

# **Lobbying Rules**

18 USC 1913 prohibits the use of appropriated funds to lobby a member of Congress. The statute reads, in part, as follows: "No part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of Congress, a jurisdiction, or an official of any government to favor, adopt, or oppose, by vote or otherwise, any legislation, law, ratification, policy, or appropriation, whether before or after the introduction of any bill, measure, or resolution proposing such legislation, law, ratification, policy, or appropriation. ..." These restrictions also apply to social media. Refer any questions to GSA's Office of General Counsel.

Resource: OMB Policies for Federal Public Websites

# When the Federal Advisory Committee Act Applies

Since many social media technologies excel at enabling information-sharing across the Internet, government programs may use them to share ideas on current and future plans, to gather opinions about a variety of issues and to strengthen the relationship between the public and government. Depending on the circumstances (such as targeting specific experts for an online discussion of proposed policy); these interactions may be subject to the Federal Advisory Committee Act (FACA). If the group that is interacting with GSA meets the definition of an advisory committee under FACA, the group's activities will likely be subject to the FACA. An advisory group meeting held in virtual space instead of office space is not exempt from the government's rules on FACA.

The Federal Advisory Committee Act applies when:

- a statute, executive order, or federal agency establishes or utilizes any committee, board, commission, council, conference, panel, task force, or other similar group in the interest of obtaining advice or recommendations for the President or one or more agencies or officers of the Federal Government; and
- at least one member of the group is not a federal employee.

The Federal Advisory Committee Act does not apply when an agency seeks individual advice or feedback from the general public (e.g. town hall meeting).

To find out if a group is subject to the Federal Advisory Committee Act, contact the sponsoring agency's committee management officer, or the GSA committee management secretariat at <a href="mailto:cms@gsa.gov">cms@gsa.gov</a>.

Resource: Federal Advisory Committee Act

# **Getting Started**

# **Creating New Accounts**

GSA encourages an established Social Media presence that supports our mission of providing the best value in real estate, acquisitions and technology services. Accounts must support GSA's overall mission, adhere to the mission of the administration and include GSA branding (images and bio information).

#### **Social Media Accounts**

If you determine that a social media product will enhance your customer's experience, you must submit a request to OSC.

#### **Account Guidelines**

- All accounts must support GSA's overall mission
- All accounts must be representative of GSA as an official account
- All accounts must adhere to GSA IT's Rules of Behavior
- Provide <a href="mailto:socialmedia@gsa.gov">socialmedia@gsa.gov</a> with the name and email address of the account admin
- If your business needs change and you are unable to tweet at a regular rate, please let socialmedia@gsa.gov know and we can accommodate supporting social amplification for your team/principal from the main GSA twitter account
- Accounts must adhere to the GSA Branding in social media guidelines

# **GSA Branding in Social Media**

Official accounts must use GSA Branding on social media pages. Accounts for offices should use the GSA Star Mark as the icon picture and include an explanation of the office in the bio section. Accounts for GSA employees using social media in their professional capacity should use their official GSA photo as the icon picture and include their title and role in the bio section.

GSA recognizes that some offices have agency-approved branding outside of the GSA Star Mark. For those offices, please note this is your request to create a social media account.

Employees should be aware that they do not have permission to use agency branding on unofficial or personal accounts. The GSA StarMark and related branding are federally registered trademarks with the U.S. Patent and Trademark Office. The agency does not give employees permission to use the GSA StarMark and related agency branding. Those wishing to use the GSA StarMark must obtain specific authorization to do so. Only individuals specifically authorized by the agency to do so may use the GSA seal. Unauthorized use could be subject to criminal penalties under Title 18 of the U.S. Code.

# **Approval Process**

If a program office or individual is interested in establishing a social media presence, they should:

- 1. Send a request with a justification to socialmedia@gsa.gov. Justification should include:
  - Requesting office
  - Type of social media account
  - Account manager name
  - How you plan to use it strategically (See Using Social Media to Reach Your Audience)
- 2. Requests will be reviewed by GSA's Office of Strategic Communication.
- 3. OSC will notify you of the approval or denial of your request.

# Your Responsibilities

#### **Minimize Your Risk**

Social media tools and technologies such as Facebook, YouTube and Twitter, offer you powerful channels to deliver targeted marketing and outreach messages when, where and how users want information. The use of social media for federal services and interactions is growing tremendously, supported by initiatives from the administration, directives from government leaders, and demands from the public. It is your responsibility to read and apply <a href="GSA Order CIO 2104.1A CHGE 1 IT General Rules of Behavior">GSA Order CIO 2104.1A CHGE 1 IT General Rules of Behavior</a> (GSA-only link) and read Appendix E, "Risks and Mitigation Strategies," which provides recommendations and a checklist to protect our network security. Employees should also coordinate as needed with OSC and the Office of General Counsel (OGC) when creating, sharing, or discussing content regarding GSA or GSA-related matters.

# **Avoid Political Activity (Hatch Act)**

Even though social media is widely used in politics, the general rules that apply to government communications haven't changed. In your use of official social media tools, avoid any topics that may violate the Hatch Act, which prohibits you from being politically active while on duty, in any government space, in uniform or in a government vehicle. Political activity is any activity directed toward the success or failure of a political party, candidate for partisan political office, or partisan political group. In addition, even when you are acting in your personal capacity, on your own time and in your own space, you may not use your official title while participating in political activity, use your official authority to coerce any person to participate in political activity, or solicit or receive political contributions. These restrictions apply 24 hours a day, 7 days a week, 365 days a year, regardless of whether you are acting in an official or personal capacity.

Resources: <u>Hatch Act – Office of Special Counsel</u> GSA's Office of General Counsel

#### **Interactions with the Press**

Employees acting in an official capacity may not communicate with members of the press without express permission from OSC. If you are approached by a reporter on a social media page you manage in your official capacity, contact <a href="mailto:press@gsa.gov">press@gsa.gov</a>.

#### Write in Plain Language

The Plain Writing Act of 2010 requires the federal government to write all new publications, forms, and publicly distributed documents in a "clear, concise, well-organized" manner. Visit <a href="Plainlanguage.gov">Plainlanguage.gov</a> for examples of plain language and information on free training. Communicating in plain language means the audience can quickly and easily find what they need, understand what they find and act appropriately on that understanding.

#### **Monitor What You Control**

As a social media user, you're responsible for continually checking the pages you own. The person (or designee) who has responsibility for approving the page as well as the person who is posting is responsible for ensuring the information is accurate, timely, relevant and complete; and does not adversely affect the execution of GSA's or the federal government's missions and responsibilities. The person (or designee) who has responsibility for approving the page as well as the person who is posting are responsible for ensuring information is accurate in any retweets/reshares.

#### **Archive Your Social Media**

In accordance with U.S. National Archives and Records Administration <u>Bulletin 2014-12</u> and the Federal Records Act (44 U.S. Code, Chapters 29, 31 and 33), all official GSA social media records must be preserved. No official accounts are to be deactivated as all postings while in official capacity are to be archived and must be available for future access. Instead, accounts must be frozen. A frozen account means that the account will remain live but will no longer be used. The account holder (or designee) is responsible for archiving your social media records.

Resources: How to archive your Twitter account
How to archive your Facebook page

# **Ensure Meaningful Access by People with Limited English Proficiency**

Executive Order 13166 requires that people with limited English proficiency have meaningful access to an agency's federally conducted programs and activities in order to prevent national origin discrimination. The use of social media technologies to communicate and collaborate with citizens is a federally conducted activity. To ensure meaningful access by people with limited English proficiency, an agency must conduct an assessment that balances several factors including the number or proportion of eligible people with limited English proficiency, the frequency of contact, the nature and importance of the program or activity, and the availability of resources. If necessary (based on this four-factor analysis), an organization must develop and implement a limited English proficiency plan.

Resources: GSA's Office of Civil Rights Library

DOJ's Limited English Proficiency Program

# **Provide Data in a Usable Format**

Many social media technologies allow users to take data from one website and combine it with data from another, commonly referred to as "mashups." Agency public websites are required to provide most data in an open, machine readable, industry standard format that permits users to use data to meet their needs. Agencies should ensure these open industry standard formats are followed to maximize use of their data. The Digital Government Strategy initiated in 2012 encourages all agencies to make their information more usable than in the past, which helps in the development of applications and also to improve mobile technologies.

Resources: OMB Memorandum M-05-04

**Digital Government Strategy** 

**Open Data Policy** 

EO 05/09/13 - Making Open and Machine Readable the New Default for

**Government Information** 

# **Transitioning & Freezing Social Media Accounts**

There may be a need for a program office or OSC to transition or freeze social media accounts. Reasons include, but are not limited to: failure to comply with GSA social media policy or guidelines; transitioning social media accounts to a new Admin; reorganization of the office, transitioning to a new role, leaving the agency, retirement, or desire to no longer use social media accounts.

Contact socialmedia@gsa.gov for assistance to ensure proper steps are taken.

# **Appendix**

# **Frequently Asked Questions**

# What is the purpose of the GSA Social Media Navigator?

The Navigator provides guidance on how to use social media tools, such as Facebook, YouTube and Twitter, in carrying out our mission while still complying with rules and regulations. Social media is just another communications tool. When speaking in your official capacity, you must follow the same rules whether you communicate through social media, the telephone, gsa.gov or other medium.

# What does official capacity mean?

You are communicating in your official capacity when your supervisor assigns this activity as part of your official duties. Your supervisor should clearly explain the assignment and what social media tool or tools you can use. When you communicate in an official capacity you are communicating on behalf of GSA, just as if you were standing at a podium at a conference, communicating the agency's views to everyone.

# What does personal capacity mean?

Personal capacity means you are acting on your own time and representing yourself and not the agency or the US Government. It's important to remember that when you use your social media tools personally, you're not speaking for GSA, and it shouldn't appear to others as though you're speaking for GSA.

# Can I include where I work on my personal social media?

Yes, here are more details:

- LinkedIn: Can put position/agency
- Facebook: Can put position/agency
- Twitter: Position/agency has to be one of several biographical details. Include Tweets are my own

# Can I use social media tools such as Facebook and Twitter for my job?

Yes, you may use both GSA-sponsored and third-party sites to help get the agency's message out. Keep in mind the rules governing official GSA communications, such as the Standards of Ethical Conduct for Employees of the Executive Branch. You must submit your request to create a social media account to socialmedia@gsa.gov.

# Does GSA's Social Media Policy require offices to use social media tools?

No. The policy simply encourages the use of social media technologies to enhance communication, collaboration and information exchange in support of our mission.

# It manage my office's social media platforms. What can't I talk about?

Your office's efforts with social media should always be related to GSA's mission, so you should always keep your message strategic and focused. Follow the same rules using your office's blog that you use with any other communication tools (telephone, Internet, etc.) These rules cover endorsements, appropriate language, political statements and other topics.

# Can I retweet any post on my organization's official twitter account?

You can retweet, but be wary of content and compliance with the social media Order and the Hatch Act. You are responsible for what you tweet. If someone else "approves/authorizes that RT" they are also responsible.

# Can I use the agency logo or my organization's branding on my personal social media?

No branding created at GSA is allowed to be used on personal accounts.

# Can I promote jobs at GSA or other agencies on my/my organization's official account?

You can promote GSA jobs on official social media accounts but not jobs at other agencies and private organizations.

# Twitter isn't Section 508 compliant, but GSA uses it to communicate. Why is that?

Information that a Federal Agency sends out via a 3<sup>rd</sup> party social media tool must also reside on the Agency website. Commercial tools are opportunities for supplementing how we reach our target audiences. They should not, however, replace official communication channels. Our offices using Twitter make the information in their posts available through official channels that meet all legal requirements. Generally speaking, as long as there's equal access to the information for people with and without disabilities, and commercial sites are not the only or official source of GSA information, our offices can communicate using sites such as Twitter or Facebook.

#### What are social media records?

As stated in the U.S. National Archives and Records Administration <u>Bulletin 2014-12</u>: Social media allows individuals to collaborate, create, organize, edit, comment on, combine, and share content, likely resulting in the creation of Federal records. The <u>Federal Records Act (44 U.S.C. 3301)</u> defines Federal records as any material that is recorded, made or received in the course of Federal business, regardless of its form or characteristics, and is worthy of preservation. Social media content that meets this definition must be managed according to the applicable laws and regulations.

This list of questions will help you determine record status of your social media content:

- Does it contain evidence of an agency's policies, business, or mission?
- Is the information only available on the social media site?
- Does the agency use the tool to convey official agency information?
- Is there a business need for the information?

If the answers to any of the above questions are yes, then the content is likely to be a Federal record. Also, social media content may be a Federal record when the use of social media provides added functionality, such as enhanced searchability, opportunities for public comment, or other collaboration. A complete Federal record must have content, context, and structure along with associated metadata (e.g., author, date of creation). The complete record must be maintained to ensure reliability and authenticity.

# I manage my office's social media account. Am I responsible for archiving the records?

Yes, the account holder (or designee) is responsible for archiving your social media records.

#### Resources

#### General

- <u>GSA Social Media Directory</u> Visit our sites and be social! The Directory includes a comprehensive list of GSA-managed digital accounts and links to policy and guidance.
- <u>U.S. Digital Registry</u> GSA's DigitalGov manages the registry (available in English and Spanish), in which anyone can confirm the validity of a variety of government social media accounts. All official agency digital accounts should be added to the registry.
- <u>DigitalGov</u> This site is a platform to help those in agencies providing digital services and information for the public. DigitalGov staff works government-wide to help all agencies strengthen their social media practices, including working to negotiate Federal—compatible Terms of Service (TOS) agreements between the federal government and vendors who offer free social media tools.

# **Comment Policy**

- GSA's Social Media Comments Policy The agency can monitor and remove comments that are political, target specific individuals or groups, are commercial in nature, are abusive or are similarly unacceptable.
- GSA's Office of General Counsel Contact the Office of General Counsel as situations arise that may require the monitoring or removal of comments posted on or to a GSA social media site.

#### Cookies

- OMB Memorandum-10-22 Many social media tools use "persistent cookie" technology. A persistent cookie is a small text file that a website places on a visitor's computer so that it can remember the visitor when they show up again later. In general, websites use cookies for things like a "Remember Me" checkbox that lets you quickly log into a website, or to get metrics on site usage to understand how people are using the site. You should familiarize yourself with the most recent guidance from OMB on the use of persistent cookies by Federal agencies in.
- OMB Memorandum-10-23 Guidance for Agency Use of Third-Party Websites and Applications.

#### **Privacy**

- <u>"Privacy Act Statement"</u> The government requires public-facing websites to conduct privacy impact assessments if they collect personally identifiable information (PII). They should post a statement that describes the agency's legal authority for collecting personal data and how the data will be used. Privacy policies on each website also must be in a standardized machine-readable format such as the Platform for Privacy Preferences Project, or P3P. Information on social media platforms must be accessible by others, so don't disclose information protected by the Privacy Act or other PII unless you're authorized to do so in that medium.
- GSA's Privacy Program GSA protects PII security and confidentiality through various methods including security technologies and strict access controls. GSA's Privacy Act program establishes the processes and procedures, and assigns responsibilities, for fulfilling the Privacy Act's mandate. Also published here is our privacy policies and practices as they apply to GSA employees, contracting requirements, contractors, and clients.
- Privacy Best Practices for Social Media Guide created by the Federal CIO Council.

## **Records-Keeping**

 <u>Bulletin 2014-12</u> - Released by the U.S. National Archives and Records Administration, this Bulletin provides guidance on managing social media records. The use of social media may create Federal records that must be captured and managed in compliance with Federal records management laws, regulations, and policies.

# **Risks and Mitigation Strategies**

 GSA IT - Social media sites are not, for the most part, any more or less insecure than other types of web applications. GSA IT monitors efforts to mitigate vulnerabilities affecting the GSA Enterprise in a timely manner, manages the annual Federal Information Security Management Act (FISMA) assessment process and conducts continuous monitoring of GSA systems and the Agency Incident Response Program.

# **Requirements Checklist When Using Social Media**

This is a quick reference to help make sure you're doing everything right when using social media tools in your official capacity as a GSA employee.

Have I? (Yes/No)	Action
	read and understood GSA's IT Rules of behavior?
	considered how to communicate strategically?
	contacted the Office of Strategic Communication (OSC) with your request to create an account?
	made sure that my social media is accessible to people with disabilities by following Section 508 accessibility rules?
	planned for records management?
	paid attention to copyrights and other intellectual property?
	complied with all privacy protections requirements?
	avoided political activity and adhered to lobbying rules?
	made sure my data is in a usable, machine readable, industry standard format?
	found out whether the Federal Advisory Committee Act (FACA) applies?
	checked into whether I need to get OMB approval for surveys?
	made sure that my communications reflect the agency's position rather than just one person's opinion?
	had someone review my content to make sure that it is written in plain language and that I am being objective and trustworthy?
	ensured meaningful access to people with limited English proficiency?
	followed a plan for monitoring my social media content regularly?

**Change Log for Annual Update** 

Number	Date	Person Posting Change	Change
#1	Dec. 9, 2015	Monica Fitzgerald, GSA IT	Updated all links and edited text for clarity.
#2	Dec. 9, 2015	Monica Fitzgerald, GSA IT	Changed the terms "Official Use" and "Personal Use" to "Official Capacity" and "Personal Capacity" on page 3.
#3	Dec. 9, 2015	Monica Fitzgerald, GSA IT	Removed reference to outdated title "GSA's Center for Excellence in Government" on page 4.
#4	Dec. 9, 2015	Monica Fitzgerald, GSA IT	Updated the language on Nonpublic Information including a link to information on Controlled Unclassified Information (CUI) on page 7.
#5	Dec. 29, 2015	Monica Fitzgerald, GSA IT	Updated the language on Intellectual Property on page 10.
#6	Dec. 29, 2015	Monica Fitzgerald, GSA IT	Added a link on Privacy Best Practices for Social Media from the Federal CIO Council to the Privacy Considerations section on page 10.
#7	Dec. 9, 2015	Monica Fitzgerald, GSA IT	Updated the language on the Hatch Act on page 11.
#8	Dec. 9, 2015	Monica Fitzgerald GSA IT	Updated the language Providing Data in a Usable Format and added a link on making information open and machine readable on page 11.
#9	Apr. 28, 2017	Sarah Bryant, GSA OSC	Updated the language for the introduction and removed the Section 1 title. Updated language on Official Capacity vs. Personal Capacity. Added a section "Creating New Accounts". Moved GSA's Social Media Landscape to be Section 6. Revised the language for Section 4 "Social Media Use Should be Strategic" and incorporated it into a revised Section 1 "Using Social Media to Reach Your Audience". Updated language in Section 2 "Your Responsibilities" and moved it to Section 5. Updated the language for Section 7 "This Guide Will be Continued to be Reviewed".
#10	Oct. 4, 2017	Sarah Bryant, GSA OSC	Added "Interactions with the Press" section under "Your Responsibilities" (p. 7), added information under "Transitioning & Freezing Social Media Accounts" about consequences for noncompliance (p. 8), added information in "Minimize Your Risk" (p. 8) about coordinating with OSC and OGC, and added information in "Understanding Official vs. Personal Accounts" (Section 4, p. 15-16) about using social media accounts in official and personal capacities.
#11	Feb. 2018	Kristen DiReda, GSA OSC	Updated FAQs. Reorganized content order for improved clarity.