# BLM External New Media Strategy

**BLM**

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# Introduction

Since March 30, 2010, the Bureau of Land Management (BLM) has been actively engaged in the use of third-party external social media sites as part of its continuous effort to communicate with and engage its publics and stakeholders.

Under the direction of the Department of Interior's (DOI) Social Media Policy (Appendix A), the BLM's National Communications Directorate (Washington Office or WO 600) and State External Affairs Offices have established 41 distinct social media presences across Facebook, YouTube, Twitter, and Flickr. These social media sites have generated over 40,000 combined fans and followers, have generated tens of thousands of comments, and have published over 475 videos that have been viewed more than 140,000 times.

The BLM's external new media portfolio is managed by the BLM's New Media Lead in the Office of Assistant Director for Communications (AD-600). The BLM's New Media Lead coordinates with DOI's New Media Office and provides high-level input into DOI's new media policy, develops policy for the BLM's new media program, and provides the tools and framework under which the Bureau's new media program operates. In addition, the BLM's New Media Lead ensures that new media operations meet the needs of and conform with the vision of the

BLM's leadership and that the BLM speaks with one voice through new media.

The BLM's success in external new media operations stems from a unique partnership between the national and state offices. The BLM's overarching new media strategy is to encourage development at the state level due to the local nature of the BLM's operations. The Bureau's national and state communications staff believes that interactive communities are best built closer to on-the-ground activities. The BLM's evolving national presence, managed by the New Media Lead, syndicates state content and messaging that advances the priorities of the Director and Secretary.

As laid out in IM 2010-112 (Appendix B), all external new media operations and presences are approved and created by the BLM's New Media Lead, and all new media content is managed by WO or State communications staff. As the messaging and engagement arm of the BLM, WO 600 is responsible for setting policy for all external engagement efforts of the Bureau including New Media. This document was prepared by WO 600 and communications professionals from across the BLM who have been successfully advancing the Bureau's new media priorities for nearly to two years.

The phrase new media typically refers to interactive forms of Internet-based, including podcasts, RSS feeds, social networks, text messaging, blogs, wikis, and virtual worlds. In this strategy, the phrase "social media" may be used where social new media tools (such as Facebook and Twitter) are discussed, but use of that phrase does not limit the scope. Per DOI policy, external new media tools that are managed by Communications, and thus in scope for this strategy, include but are not limited to:

Media Sharing - Examples: YouTube, Flickr, iTunes;

Blogging/Microblogging - Examples: WordPress, Blogger, Twitter;

Social Networking - Examples: Facebook, MySpace, LinkedIn, Ning;

Document and Data Sharing Repositories - Examples: Scribd, SlideShare, Socrata;

Social Bookmarking - Delicious, Digg, Reddit;

Widgets - Examples: Google Maps, AddThis, Facebook "Like"; and

Video Streaming -- Examples: uStream, Livestream.

This strategy outlines four overarching goals of the external new media program, with strategic objectives and action items that address each of the goals. Additionally, the strategy outlines ongoing challenges in the development of the BLM's new media program and offers solutions for each. Finally, the document identifies action items for immediate implementation and outlines the roles and responsibilities for the BLM's external new media operations.

# Goal 1: *The BLM will use new media to become a more transparent agency and deliver rich, meaningful content.*

*The BLM will use social media to become a more transparent agency, share its mission, and broaden its audience. BLM Director Bob Abbey has established a goal that citizens will become more engaged in and aware of the BLM-managed lands. To achieve that goal, the BLM must proactively reach out to stakeholders and new communities through multiple devices and media.*

## Regularly Engage the Public Where They Are

New media can reach members of the public where they are—on their laptops, smartphones, iPads, and in their homes, workplaces, or frequent recreation spots. The public can visit a BLM office virtually or gather information through new media. The use of new media also allows the BLM to reach a different audience than it would normally reach through traditional methods. Through social networks, the BLM can reach a diverse public and engage communities across of geographic or economic landscapes, thereby allowing more democratic access to and stewardship of public lands.

## Follow the Conversation on Blogs and other Social Media

The BLM should follow all available outlets of information, including blogs and other organizations' social media sites, to be aware of trends and conversations pertaining to BLM lands and activities.   The BLM's communications staff and program leads can best address any public concerns or issues related to BLM lands and programs when they know what the public is saying about us and other agencies.

## Counter Misinformation in the Same Medium

The BLM should use its external social media sites to counter misinformation in social media. Increasingly, the public receives its news and information through social media, and responding to allegations and misinformation through traditional media –such as press releases, website posts, and interviews- will not reach those individuals exposed to misinformation.

By posting content on Facebook, Twitter, YouTube, and other social media sites, the BLM's communications professionals can insert BLM's message and factual information into the conversation where it occurs.

## Deliver Rich, Meaningful Content

The BLM should use new media to deliver content that the public wants to consume. Social media allows us to add a depth and layer through words, pictures, video, etc. that we can't achieve through other venues.  It gives us a way to connect with people that is transparent and genuine, compelling and meaningful.

## Initiate the Conversation

The BLM has moved from being reactive to proactive on social media sites by  pushing our message and content.  The BLM should continue to use its social media sites to initiate conversations on its terms.

The BLM maintains **15** Facebook pages that have a combined following of more than **41,000** fans.

# Action Items

## Focus on things people want to share/ refine our efforts

The BLM communications staff will constantly evaluate interactions, comments, and views of content posted on social media sites to refine content.  The BLM will post content that moves its message while encouraging members of the public to consume content and share content with others.

## Promote our presence

The BLM communications community will continuously seek new ways to market the BLM on social media.

- The BLM communications community will implement and encourage the use of email signatures that highlight the BLM's presence in social media.

- The BLM communications community will encourage the mention of social media sites in appropriate BLM publications and investigate insertion of social media references on the standard business card template

- The BLM communications community will incorporate AddThis (share) buttons on its external webpages as part of the enterprise web redesign effort.

- The BLM communication staff and program leads will encourage partners and stakeholders to advertise the BLM's social media presence through direct links and content syndication.  The BLM communications staff will actively provide new content to such groups for syndication.

## *Use each medium to provide content people expect to see*

BLM Communications will provide content on social media sites in the same format in which the public posts and consumes content.

- While utilizing content available on blm.gov, the BLM communication staff will rephrase and repackage content to ensure that it takes the form of social media content, not just web content posted on social media sites.

- The BLM will avoid RSS syndication on social media sites.  The BLM communications staff will actively post content directly on third-party sites.

- The BLM will continue to manage the Wild Horse and Burro Facebook page under the unique parameters established by WO Communications.

The BLM has posted **476** videos on YouTube, which have been viewed more than **144,000** times.

# *Goal 2: The BLM will use new media to raise awareness of the BLM's mission and activities*

*The BLM should use social media to raise awareness of the agency's multiple-use mission, myriad activities and programs, and contributions to the public. In FY 2010, the activities on BLM-managed lands supported more than 550,000 jobs and boosted the economy by more than $122 billion. Social media is an effective vehicle for communicating this broad range of responsibility and activity.*

## Promote Expertise Unique to the BLM

The BLM should use external social media to support the highly-qualified BLM specialists in communicating their knowledge and expertise with the public. The BLM's mission is supported by 10,000 highly-qualified employees dedicated to the balanced stewardship of the public lands for present and future generations. These employees are, in many cases, some of the best at what they do. Using social media to tell their story will not only enhance the credibility and leadership of the BLM but also allow BLM employees to affect land stewardship discussions outside of the BLM.

## Highlight Multiple-Use While Emphasizing "Fun Stuff"

The BLM can use social media to expose the public to the broad range of BLM activities, while at the same time, highlighting the sorts of activities the public can more actively engage in. Some BLM functions are decidedly more "social" than others: for example, recreation, the NLCS, and youth programs. By taking a structured approach to external social media, the BLM can raise awareness of all activities while more actively providing content that will encourage interaction and engagement by the public.

# Action Items

## Engage BLM employees to develop content

The BLM will encourage employees to develop social media content that captures the full range of the BLM's mission. The BLM communications staff will utilize the existing national MyBLM blog and local internal communication tools to collect this content, and will rely on internal video/photo sharing technology (implemented by IRM) to further enhance BLM employees' ability to create and share content.

## Advertise our presence

The BLM's National New Media Lead will ensure that all BLM social media sites follow/like each other and will push content for syndication across National and State social media sites as appropriate.

# *Goal 3: The BLM will use new media to recruit and retain a diverse and talented workforce*

*The BLM will utilize new media solutions to recruit and retain a diverse and talented workforce. The BLM's recruitment efforts support the Department of the Interior's (DOI) goal for an inclusive and diverse workforce that represents the American public that it serves. The Department's goal and BLM's recruitment efforts address the mandates under the numerous Executive Orders, and the BLM's recruitment activities support Interior*

*Secretary Ken Salazar's pledge that the DOI will create the "Next Generation of Conservation Leaders." In a time of limited resources, the BLM must utilize new media tools – tools that reach target audiences en masse through cost effective means – to successfully address the Department's diversity and hiring goals and the BLM's workforce needs.*

# Action Items

## *As a home base for all social media and marketing, enhance the BLM's national career web pages*

- The BLM's communications and human resources staff will add more pictures and videos of BLM employees from diverse backgrounds, to include youth, veterans and veterans with disabilities, as well as ethnic diversity

- The BLM's communications and human resources staff will add employee diaries – similar to the Peace Corps volunteer diaries – posted by student employees and employees in professions of greatest need

- The BLM's communications and human resources staff will develop a recruitment calendar that can sync with social media sites

- The BLM's communications and human resources staff will develop e-brochures about BLM careers and special hiring programs, such as the Presidential Management Fellows (PMF) Program

## *Expand recruitment efforts on social media sites*

- The BLM's communications and human resources staff will create and post additional employee videos on the BLM's National YouTube site

- The BLM's communications and human resources staff will add feeds on the BLM's National Careers Twitter site that follow employee diaries on the BLM's national career web pages

- The BLM's communications and human resources staff will develop a Careers Facebook page

## *Post the BLM's job vacancies on free partner social media sites and job boards to enhance recruitment efforts*

- The BLM's communication and human resources professionals will post job vacancies on the nation's largest job aggregators, Simply Hired and Indeed; job boards such as Craigslist; and social media sites hosted by partner organizations, such as www.FedsHireVets.gov.

# Goal 4: *The BLM will continue to be a leading DOI agency in the use of external new media*

*Since 2009, the BLM has helped lead the way in the development of an external social media presence at DOI. Working closely with the Department's New Media Director, the BLM has supported the creation of social media sites at the national and state levels, and through appropriate governance and management strategies, has developed thousands of engaged followers and fans.*

## Emphasize local

The BLM must continue to emphasize local content across its social media universe while, at the same time, maintaining effective Communications governance. While the BLM is headquartered in DC, its content lives out West; the experiences and opportunities the BLM provide are local and community-based in nature. By continuing to highlight local opportunities on state social media sites, the BLM will engage its public in ways it that it cannot from a national level. That said, the BLM must further syndicate state content nationally and develop a robust national presence.

## Engage regularly

The BLM's talented communications staff must continue to engage regularly on its external social media sites.  Failure to provide new, fresh content on social media pages will result in a disengaged public who will be less likely to consume our social media content.

# Action Items

## Actively engage with DOI New Media Director

The BLM's New Media Lead will continue to actively engage with DOI New Media Office to ensure that the BLM is engaging in new media efforts appropriately and to encourage the use of new tools and sites that advance the Bureau's mission.

## Investigate sites at local level

At the discretion of the BLM's New Media Lead and State External Affairs Chief, the BLM will pilot social media sites at the local level, to investigate the potential of social media sites for targeted local sites.  Current sites under consideration include a Facebook page for Prehistoric Pathways National Monument, District Facebook pages in Colorado, and a Facebook "Ambassador" program for the Imperial Sand Dunes in California.
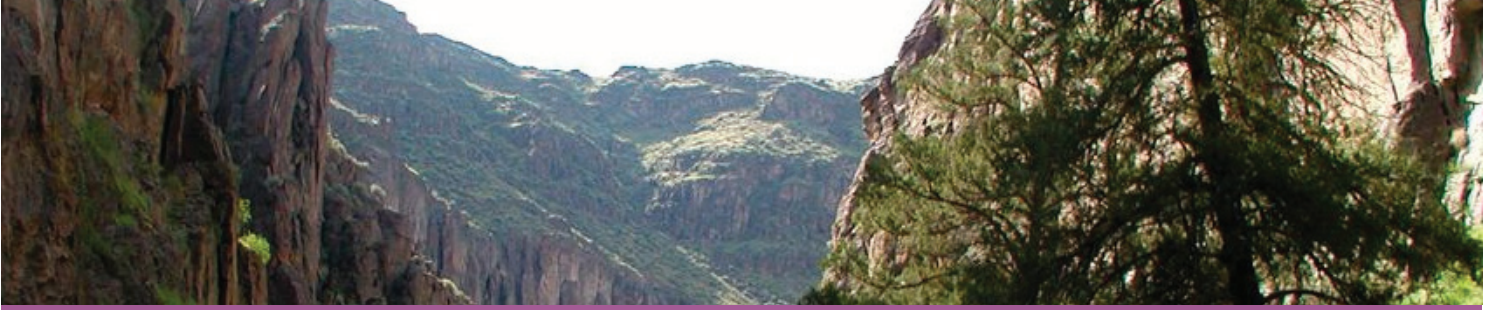
# Potential Challenges

The use of external new media across the BLM raises certain chanllenges.

*New media, especially social media, is a powerful communications tool that can compete with other communications/mission needs*

The use of external social media at the BLM is inherently a communications function. As such, the BLM must rely on its communications/external affairs professionals to manage the social media sites. Development of content for social media requires both labor and resources, and as such, the BLM must seek efficiencies in managing content and communications. The BLM must empower its communications professionals to manage and integrate new media and traditional media effectively.

**Options:**

- Use of tools like Hootsuite to manage posting of content

- Dedicated New Media Specialist in State Office or plan fornew media integration with existing staff

- Regular social media meetings among State/National new media leads and with programs

- Sharing/reusing content

*The new media universe is constantly evolving*

**Options**:

- Engaging with DOI on emerging outlets

- Continuous evaluation business need

for new media

- Engage IRM if technical support is needed

## *Management of numerous sites may dilutemessage*

**Options**

- Effective communication and coordianation between National/State new media leads

- Connection of new media messages to content on BLM.gov

- Effective oversight of new media staff by EA/Communication chiefs

- Constant interaction between DOI New Media and BLM New Media Lead

## *It's too easy to get into the weeds*

**Options**

- Effective governance from WO Communications

- Internal website for best practices

# Priority Action Items

## Development of internal website to share governance, strategy, and links to social media sites
Responsible Party: Communications

## Hiring/reassignment of dedicated New Media Specialist in each State Office, or alternate plan for staffing
Responsible Party: State Directors, Communications, Director

## Creation of employee New Media Guide
Responsible Party: Communications, State EA Chiefs

## Development of internal photo/video sharing technology
Responsible Party: IRM, Communcations

# Roles and Responsibilities

This section outlines the roles and responsibilities for New Media activity within the Bureau of Land Management (BLM).  This section conforms to the Department of Interior's (DOI) policies regarding new media/web 2.0 technologies, specifically the Social Media Policy and Department Manual Chapter for Communications.  The types of content and examples of services to which this policy applies include, but are not limited to:

- Media Sharing - Examples: YouTube, Flickr, iTunes

- Blogging/Microblogging - Examples: WordPress, Blogger, Twitter

- Social Networking - Examples: Facebook, MySpace, LinkedIn, Ning

- Document and Data Sharing Repositories - Examples: Scribd, SlideShare, Socrata

- Social Bookmarking - Delicious, Digg, Reddit

- Widgets - Examples: Google Maps, AddThis, Facebook "Like"

Parties Involved:

- Washington Office (WO) Communications Point of Contact

- WO Information Resources Management (IRM) Point of Contact

- WO Human Capital Management Point of Contact

- DOI New Media Director

- State BLM External Affairs Chiefs

**I. External Third-Party New Media Websites Approved by DOI**

a.      Per DOI policy, WO Communications will be responsible for creating and managing all third-party web presences.  This includes all services listed in the Department's Social Media Policy and Social Media Guidebook.

b.      Any program or State requesting a third-party web presence must submit the request to the State External Affairs Chief or WO Communications Point of Contact (POC), depending on the scope of the request.  The request must include a written justification that contains the nature of the site, list of individuals who would manage content, examples of content to be posted, and statement outlining the benefit to the BLM and the public.

c.      Requests approved by State External Affairs chiefs must also be approved by the WO Communications POC.

d.      Communications will notify DOI upon activation on any new social media presence, and will also notify AD-IRM and publish to http://www.blm.gov/socialmedia

e.	Where access to these sites requires action by Information Resources Management (IRM), IRM will enable access to the sites for Communications staff and take lead on determining access levels for all BLM employees.

f.	Where use of these sites requires interconnectivity to the BLM network or special access from the BLM network, IRM will be responsible for managing connectivity.

g.	Where use of these sites allows for custom templates or coding, Communications will work with IRM to develop templates.

## II.	External Third Party Social Media Websites Not Approved by DOI

a.	Per DOI policy, agencies should not engage in external third party social media websites independently without approval from the Communications POC and the DOI New Media Director.

b.	Where a state or program inquires as to a new social media website not approved by DOI, Communications will be responsible for coordinating with DOI New Media Director as to viability of this website.

c.	Any program or State requesting a third-party web presence must submit the request to the State External Affairs Chief or WO Communications Point of Contact (POC), depending on the scope of the request.  The request must include a written justification that contains the nature of the site, list of individuals who would manage content, examples of content to be posted, and statement outlining the benefit to the BLM and the public.

d.	Requests approved by State External Affairs chiefs must also be approved by the WO Communications POC.

e.	If the BLM is granted approval to proceed independently, IRM will be responsible for conducting a PIA and network vulnerability study, while Communications will be responsible for Terms of Service negotiations.

f.	Upon completion of PIA and TOS, IRM will present final package to Deputy Director, Operations for signature.

## III.	External Social Media Presence (blog, calendar, mobile application) On BLM.GOV

a.	For all web communications that can be accomplished through our content management system, Communications will be responsible for establishment and maintenance of the content.

b.	Where a program or state identifies new social media functionality for the website, upon submission of the request from State External Affairs chief and approval of concept by Communications, IRM will be responsible for PIA, network vulnerability analysis, and software development.

c.	No social media presence may be established on BLM.gov without IRM approval as to privacy and network impact/security.

# Appendix A — DOI Social Media Policy

## SECTION 1: Social Media and Social Networking Policy

The following policy regarding the official and non-official/personal use of social media and social networking services and tools is effective Nov. 18, 2010. This policy describes the official use of social media and social networking tools in the establishment and use by DOI or a DOI bureau of a third-party social networking or social media account or service as an official means of communication or public engagement. This policy does not govern the visiting of third-party social media or social networking websites in one's official capacity for research or informational purposes.

At the time of this policy's publication, only four social media tools are approved (Facebook, Twitter, Flickr, and YouTube). Other examples in this policy are provided for illustrative purposes only.

The types of content and examples of services to which this policy applies include, but are not limited to:

• Media Sharing - Examples: YouTube, Flickr, iTunes

• Blogging/Microblogging - Examples: WordPress, Blogger, Twitter

• Social Networking - Examples: Facebook, MySpace, LinkedIn, Ning

• Document and Data Sharing Repositories - Examples: Scribd, SlideShare, Socrata

• Social Bookmarking - Delicious, Digg, Reddit

• Widgets - Examples: Google Maps, AddThis, Facebook "Like"

President Obama's memo on Open and Transparent Government encourages Federal agencies to use technology to communicate and engage with the public. Social media services and tools (often referred to collectively as "Web 2.0") are powerful and effective means to communicate quickly and broadly, share information, and interact with colleagues and the public. DOI is taking advantage of these third-party tools and services in order for to reach a wider audience and to facilitate and enhance professional communication and collaboration.

It is critical that social media tools be accessed and used in a responsible manner. As with e-mail and other electronic means of communication, official use of these applications to communicate and engage with the public must be in accordance with all the applicable Federal policies related, including but not limited to the Section 508 (Accessibility), Records Management, Retention, and Archiving, Information Quality, and Intellectual Property. (See Section 2.).

Under the auspices of Departmental Manual Part 110, 5.3.A, the DOI Social Media Handbook provides additional information and best practices about the use of social media and social networking at DOI.

**Official Use of Social Media and Social Networking at DOI**

DOI encourages its bureaus to use social media tools to communicate their missions and messages with the public when there is a legitimate business case to do so. Bureaus are encouraged to carefully weigh their options when deciding whether to use social media. The DOI Social Media Handbook provides guidance on specific types of social media tools and services.

Before beginning any social media project, employees must first be granted approval to use social media, social networking, or other Web 2.0 services or tools to directly support or enhance activities being undertaken in an official Department of the Interior capacity. Contact persons for each Bureau and office are listed in Appendix A. Each bureau and office will maintain a catalog of all official social media presences; this catalog will be periodically reported to the DOI Office of Communications and Office of the Chief Information Officer.

The need for this approval is threefold: (1) There may already be bureau- or Department-level social media efforts that accomplish the same or similar goals. It is necessary for the bureaus and the Department to keep track of social media efforts to ensure there is no undue overlap or duplication. (2) Bureau-level coordination and participation helps ensure that information is, when appropriate, delivered to our constituents and the public in the context of unified themes or messages. (3) A social media account must be covered under a special terms of service agreement (TOS), privacy impact assessment (PIA) and possibly a system of records notice (SORN) approved by the Department of the Interior. In order for a new social media account to be covered under a DOI TOS agreement, it must be approved by the bureau point of contact in Appendix A and reported to the Department Office of Communications.

Any social networking profiles or social media presences that have not been approved via your bureau's point of contact may be terminated.

Bureaus will periodically report on all social media presences to the DOI Office of Communications and Office of the Chief Information Officer. DOI will keep a running list of all official presences on third-party social media Web sites so the public may know which communications channels are DOI approved. Only approved social media presences will be included on this list.

The use of social media services is further dependent on those services that have approved DOI TOS agreements. If there are third-party services that a bureau has identified as appropriate for use, the bureau office of communications or public affairs officer should contact the DOI Office of Communications for review of the TOS and confirm PIA and SORN compliance.

**Guiding Principles**

- The following principles should be employed when using public-facing social media services in an official capacity within DOI.

- Do not discuss any agency or bureau related information that is not considered public information. The discussion of sensitive, proprietary, or classified information is strictly prohibited. This rule applies even in circumstances where password or other privacy controls are implemented. Failure to comply may result in fines and/or disciplinary action.

- Third-party social media Web sites should never be the only place in which the public can view DOI or bureau information. Any information posted to a third-party social media Web site must also be provided in another publicly available format such as the DOI or bureau Web site.

- When you are representing DOI or a bureau in an official capacity, DOI or the bureau is responsible for the content you publish on blogs, wikis, social networking Web sites, or other forms of social media. Assume that any content you post may be considered in the public domain, will be available for a long period of time, and can be published or discussed in the media -- likely beyond your or DOI's influence

- Remain focused on your mission. If using social media tools to communicate with the public isn't one of your primary duties, don't let it interfere with those duties.

- Know and follow DOI and Executive Branch conduct guidelines, such as the Appropriate Use of the Internet, Limited Personal Use of Government Equipment, and Standards of Ethical Conduct for Employees of the Executive Branch.

- Do not engage in vulgar or abusive language, personal attacks of any kind, or offensive terms targeting individuals or groups.

- Do not endorse commercial products, services, or entities.

- Do not endorse political parties, candidates, or groups.

**Non-Official/Personal Use of Social Media and Social Networking**

DOI employees, or those working on behalf of DOI, who use social media and social networking services and tools for strictly personal use outside of the workplace do not require approval to do so. However, DOI recognizes that these types of tools can sometimes blur the line between professional and personal lives and interactions. Therefore, employees are reminded that, as representatives of DOI, their office, or their bureau, the above rules and guidelines must be taken into consideration when participating in these services at any time, but particularly when identifying themselves as employees of DOI or when context might lead to that conclusion. Any activity using Government equipment (including access to the Internet) is governed by Department of the Interior guidelines on the Personal Use of Government Office Equipment.

By exercising discretion and common sense when employing social media for professional or personal purposes, you will help assure that their great potential is fully realized without inadvertently compromising our professional, legal, or ethical standards.

Employees should remember that standards of ethical behavior and other ethics policies are applicable. (See Section 2.)

**Guiding Principles**

The following principles should be employed when using social media services in an non-official/personal capacity within DOI.

Be aware of your DOI association in online social networks. If you identify yourself as a DOI employee or have a public facing position for which your DOI association is known to the general public, ensure your profile and related content (even if it is of a personal and not an official nature) is consistent with how you wish to present yourself as a DOI professional, appropriate with the public trust associated with your position, and conform to existing standards, such as Standards of Ethical Conduct for Employees of the Executive Branch.  Employees should have no expectation of privacy when using social media tools.

When in doubt, stop.  Don't post until you're free of doubt.  Be certain that your post would be considered protected speech for First Amendment purposes.  Also, add a disclaimer to your social networking profile, personal blog, or other online presences that clearly states that the opinions or views expressed are yours alone and do not represent the views of the Department of the Interior or your bureau.

In a publicly accessible forum, do not discuss any agency or bureau related information that is not already considered public information. The discussion of sensitive, proprietary, or classified information is strictly prohibited. This rule applies even in circumstances where password or other privacy controls are implemented. Failure to comply may result in fines and/or disciplinary action.

# SECTION 2: Federal Policies Applicable to the Use of Social Media

Including, but not limited to, Section 508, Records Management/Retention/Archiving, Privacy and the Freedom of Information Act

**Section 508 (Accessibility)**

Section 508 of the Rehabilitation Act of 1973, (as amended), requires that electronic and information technologies purchased, maintained, or used by the Federal Government meet certain accessibility standards. These standards are designed to make online information and services fully available to the 54 million Americans who have disabilities, many of whom cannot possibly access information that does not comply with the Section 508 standards. Agencies are already required by Federal Acquisition Regulations to modify acquisition planning procedures to ensure that the 508 Standards are properly considered and to include the standards in requirements documents. OMB reminds agencies to disseminate information to the public on a timely and equitable basis, specifically mentioning meeting the Section 508 requirements in OMB Memorandum M-06-02. Agencies employing non-Federal Web 2.0 services are required to ensure that persons with disabilities have equal access to those services as defined in the Accessibility Standards. However, equivalent access to the information disseminated on those services must be displayed on the agency's Web site with a clear link back to accessible content.

All content displayed on DOI and bureau Web sites must adhere to 508 standards regardless of whether or not the content is created and hosted by DOI or bureaus. Content created and hosted by a third party and displayed on DOI or bureau Web sites via a widget is subject to 508 compliance standards.

At the time of this writing, changes are being considered to official implementation of Section 508 standards. These changes would essentially require that federal websites be Level AA conformant to WCAG 2.0 standards. In anticipation of such revisions, DOI requires that Interior websites conform to WCAG 2.0 Level AA standards whever possible.

Resources: Section 508 of the Rehabilitation Act, OMB Memo M-06-02, Draft Information and Communication Technology (ICT) Standards and Guidelines (http://www.access-board.gov/sec508/refresh/draft-rule.htm)

## Records Management, Retention, and Archiving

When using electronic media, whether it is a blog, a Web site, a wiki, e-mail, or any other type of electronic communication, the regulations that govern proper management and archival of records still apply. DOI users, working with the Records Management Officer, determine the most appropriate methods to capture and retain records on both government servers and technologies hosted on non-Federal hosts. The National Archives and Records Administration offers resources and guidance to agencies to ensure proper records management.

DOI and bureaus will need to work with the Records Management Officers to determine the proper records maintenance schedules and dispositions for content posted on third-party Web sites.

Resources: OMB Circular A-130, "Management of Federal Information Resources," section 8a4; Implications of Recent Web Technologies for NARA Web Guidance

## Information Quality

The public places a high degree of trust in government content and considers it an authoritative source. Under the Information Quality Act and associated guidelines, agencies are required to maximize the quality, objectivity, utility, and integrity of information and services provided to the public. With regard to 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 1) clearly identifying the benefits and limitations inherent in the information dissemination product (e.g., possibility of errors, degree of reliability, and validity), and 2) taking reasonable steps to remove the limitations inherent in the product or information produced. Agency management must ensure that the agency position is reflected in all communications rather than one person's opinion.

DOI and bureaus should include a disclaimer when posting content on third-party Web sites that explains that DOI is only responsible for quality of the information posted by the official DOI account and not for the quality of the information posted by other users.

Resource: Information Quality Act, Pub. L. No. 106-554

**Availability to Persons with Limited English Proficiency**

Executive Order 13166 requires that agencies provide appropriate access to persons with limited English proficiency. The scope of this requirement encompasses all "Federally conducted programs and activities." Anything an agency does, including using social media technologies to communicate and collaborate with citizens, falls under the reach of the mandate. Under this Executive Order, agencies must determine how much information they need to provide in other languages based on an assessment of customer needs. The requirements for social media implementations are no different than those for other electronic formats.

DOI and the bureaus are responsible for satisfying all policy requirements related to content that they provide to a third-party site; however, they cannot control and are thus not responsible for other content on that site. If the failure of the third-party site to satisfy the requirements of Executive Order 13166 or any other law or regulation discussed here presents an obstacle for the site user to the DOI or bureau content, that content must be offered on the DOI or bureau primary website in a fully compliant manner.

Resources: Commonly Asked Questions and Answers Regarding Executive Order 13166; Executive Order 13166

**Availability of Information and Access to Persons Without Internet Access**

Agencies are required to provide members of the public who do not have internet connectivity with timely and equitable access to information, for example, by providing hard copies of reports and forms. For the most part, using social media technologies as an exclusive channel for information distribution would prevent users without internet access from receiving such information. In addition, some social media services require high speed internet access and high bandwidth to be effectively used, which may not be available in rural areas or may be unaffordable. In general, this requirement is no different for social media implementations than it is for other electronic service offerings. Programs must simply make alternative, non-electronic forms of information dissemination available upon request.

Resources: OMB Circular A-130 section 8 (See a5(d)); Appendix IV

**Usability of Data**

Many social media technologies allow users to take data from one Web site and combine it with data from another, commonly referred to as "mashups." Agency public Web sites are required, to the extent practicable and necessary to achieve intended purposes, to provide all data in an open, industry standard format that permits users to aggregate, disaggregate, or otherwise manipulate and analyze the data to meet their needs. Agencies need to ensure that these open industry standard formats are followed to maximize the utility of their data.

Resource: OMB Memo M-05-04; "Provide Appropriate Access to Data" (WebContent.gov)

**Intellectual Property**

Images, text, video, audio files used in blogs or on third party social media Web sites must comply with Copyright Law of the United States of America and Related Laws Contained in Title 17 of the United States Code and other Federal policies and directives.

Generally, U.S. Government works are not protected by intellectual property law. However, that does not mean that most Government works are in the public domain. In addition, if an employee prepares a work and gives that work to a contractor pursuant to a contract, the rights to the final product may be subject to the contractor's intellectual property interest. Employees should be careful about the nature of the work they produce. Resources: Cendi, Copyright.gov, U.S. Trademark Law

**Privacy**

Federal public Web sites are required to conduct privacy impact assessments (PIAs) if they collect personally identifiable information, post a "Privacy Act Statement" that describes the agency's legal authority for collecting personal data and how the data will be used, and post privacy policies on each Web site in a standardized, machine readable format such as Platform for Privacy Preferences Project, or P3P.

The Department of the Interior requires a preliminary PIA for all systems. The preliminary PIA determines if the system contains PII, and is kept as a record by the Department.

Two-way blogs (including any system by which the public may post comments) must protect the privacy of citizens who contribute comments to the blog. Blog software must not require blog visitors to log in before leaving comments. Blogs requiring contributors to provide personally identifiable information (PII) such as an e-mail address, in order to participate must follow all guidelines for protection of that information under the Privacy Act. Bureaus are encouraged to allow the actual public-facing comments to be anonymous to promote a freer exchange of ideas.

Bureaus and offices are permitted to collect IP addresses, browser information, and similar data as part of their regular server logs and Web site visitation analyses provided that they use such information only in aggregate and cannot link it to specific blog content over time.

Although some social computing Web sites are exempt from the prior requirements since they are not Federal Web sites, DOI is always bound to protect personally identifiable information on internal Web sites or pages on external social media Web sites. The Privacy Act of 1974 (as amended) may also apply to the activities undertaken on social media platforms, and individuals should consult with the DOI Privacy Office and Solicitor's office to ensure they are in compliance with all privacy protection requirements.

Resource: Privacy Act of 1974

**Federal Advisory Committee Act**

Since many social computing technologies excel at enabling information-sharing across the Internet, government programs may use them to share ideas regarding current and future plans, to gather opinions about a wide variety of issues, and to strengthen the relationship between citizens and their government. Depending on circumstances (such as targeting specific experts for an online discussion of proposed policy), some of these efforts, depending on how they are structured, may meet the functional definition of a virtual or electronic advisory group and therefore fall under the purview of the Federal Advisory Committee Act (FACA). Just because an advisory committee meeting is held in virtual space instead of office space, it is not exempt from the Government's rules on such activities.

Any advisory group, with limited exceptions, that is established or used by a Federal agency and that has at least one member who is not a Federal employee, must comply with the FACA. In general, when Government agencies seek input and suggestions from the general public on various issues, FACA likely would not apply. However, if the Government is managing and controlling the group in any way, such as selecting members, setting an agenda, or consolidating results generated by the group of participants, the group would fall within the bounds of FACA. To find out if a group comes under the FACA, any individual may contact the sponsoring agency's Committee Management Officer or the GSA Committee Management Secretariat.

Resource: FACA; GSA's FACA overview and guidance

**Information Collection & Paperwork Reduction Act**

Agencies are required, when possible, to use electronic forms and filing to conduct official business with the public, and social computing technologies can be used in many cases to meet this need. Federal public Web sites must ensure that information

collected from the public minimizes burden and maximizes public utility. The Paperwork Reduction Act (PRA) covers the collection of data from the public. The PRA requires OMB approval of all surveys given to ten (10) or more participants. This includes any sort of survey where identical questions are given to ten or more participants, regardless of the format. The exception to the survey rule is an anonymous submission form where users can provide open ended comments or suggestions without any sort of Government guidance on the content. Questions about the applicability of the PRA should be directed to the DOI or bureau privacy officers or the Office of the Solicitor.

See Privacy, above.

Resources: Paperwork Reduction Act, DOI Office of the Solicitor

## Freedom Of Information Act

Government-sourced content posted via third-party social media Web sites or on public Government Web servers becomes part of the public domain upon posting. With limited exceptions, such content is therefore not exempt from FOIA requests.

Resource: FOIA

## Security

Any DOI-sponsored social media service or application not hosted on a DOI-controlled server must be evaluated by the Office of the Chief Information Officer according to DOI Security Categorization instructions to assess the ramifications of a potential security breach of that service. Non-DOI servers hosting DOI social media services may be required to attain certification and authentication to verify that content is adequately protected. DOI is required to host services and applications on ". (dot) gov" domains whenever possible. In order to protect IT resources, applications must not allow the insertion of malicious code through attachments of any kind. Two-way blogs must incorporate a character limit for comment forms to prevent text-dumping, and other security safeguards must be active to prevent activities that might threaten bureau IT resources.

As an additional safety measure, members of the public are not allowed to attach or upload files of any kind to DOI-hosted services; however, they may be allowed to attach or upload files to externally hosted services.  For example, a commenter to a DOI-hosted blog would not be allowed to attach a video file; but a commenter to a YouTube posting might be allowed to post a video response.

## Ethics

All Government-wide and Department of Interior standards and codes of ethical behavior for employees apply to employees'use of social networking and social media tools for both official and personal use including:

• Appropriate Use of the Internet

• Limited Use of Government Equipment for Personal Purposes

• Standards of Ethical Behavior for Employees of the Executive Branch

• Non-Official Expression

• Disclaimer

DOI and bureaus are responsible for satisfying all policy requirements related to content that they provide to a third-party

site; however, because they cannot control and are thus not responsible for other content on that site, they should determine whether or not DOI's presence on the site reflects favorably upon the Department and does not diminish its reputation or integrity.  DOI and bureaus should note that they are not responsible for, nor can they control other content on the site on the part of the site which the bureau does control, as well as on its website. If the third-party site does not meet the requirements of Executive Order 13166 or any other law or regulation discussed here in such a way as to present an obstacle for the site user to the DOI or bureau content, that content must be offered on the DOI or bureau primary Web site in a fully compliant manner.

Office of Communications

U.S. Department of the Interior

By: Matt Lee-Ashley, Director -- Nov. 18, 2010

# Appendix B — Interim Social Media Policy

April 30, 2010

In Reply Refer To:
1543, 1553 (610) I

EMS TRANSMISSION 05/06/2010

Instruction Memorandum No. 2010-112

Expires: 09/30/2011

To:      All Washington Office and Field Officials
Attn: External Affairs Chiefs and State/Center CIOs

From:   Deputy Director, Operations

Subject:            Interim Social Media Policy

Program Area: Communications; Web Governance

Purpose: Consistent with Department of the Interior (DOI) guidance and approval for participation in the DOI Social Media Pilot program, this Instruction Memorandum (IM) transmits interim policy on the establishment and maintenance of the Bureau of Land Management's (BLM) presence on approved social media websites (Facebook/YouTube/Twitter/Flickr).

Policy/Actions: All BLM employees must adhere to the following policies when seeking to use or using approved social media websites. As the BLM matures in its presence on social media websites, policies will need to be reviewed and enhanced. Working cooperatively with other BLM Directorates, including Law Enforcement, Human Capital Management, Fire and Aviation, and Information Resources Management (IRM), the Communications Directorate may establish additional policies that are consistent with this IM and may transmit them to State/Center External Affairs (EA) Chiefs.

Managing Content and Using Social Media

BLM external social media pages are to be managed in accordance with the following policies:

•        States and Centers are highly encouraged, but at this point not required, to establish and maintain a presence on approved social media websites.

•        Only authorized BLM personnel may represent the BLM on public social media websites. Authorized BLM personnel include the Washington Office Public Affairs Chief, State/Center EA Chiefs, and designated personnel within their offices. Authority may not be delegated outside the Public/External Affairs Offices at either the State or National level, though in the case of Twitter, this authority might be granted upon application. See "Twitter" discussion (below) for policy and procedures. Representation includes using the BLM login to provide content to BLM pages, using the BLM logo on any social media pages, or establishing a page/forum/channel on external social media websites, whether or not the website is approved by DOI. See "Unofficial/Personal Use" (below) for further discussion.

•        Discussions of any BLM-related information that is not already considered public information is prohibited. The discussion of sensitive, proprietary, or classified information is prohibited. This rule applies even in circumstances where password or other privacy controls are implemented.

•        A social media website can never be the only place in which the public can view DOI or BLM information. Any information posted to social media websites must also be available on the BLM Website. DOI and BLM policy both require that all information posted to third-party sites also be maintained on the BLM Website.

•        The BLM is responsible for the content published on social media websites. Assume that any content posted on a social media website is in the public domain, will be available for a long period of time, and can be published or discussed in the media.

• Treat an official use of social media websites as official correspondence using equivalent judgment, discretion and common sense.

• Per DOI policy, requests for use of other social media websites are to be submitted to the Assistant Director for Communications (AD-600), who will work with DOI, the Office of the Solicitor, and the IRM Directorate to evaluate feasibility and utility. Only Facebook, Twitter, YouTube, and Flickr have been approved.

• DOI, BLM, and Executive Branch conduct guidelines, such as the Appropriate Use of the Internet, Limited Personal Use of Government Equipment, and Standards of Ethical Conduct for Employees of the Executive Branch must be followed consistent with existing BLM policy.

Unofficial/Personal Use

Only authorized employees may represent the BLM on public social media websites. Other employees may, in their own time, participate on social media websites to the same extent as the general public. However, employees are reminded that, as representatives of the BLM the rules and guidelines in this IM must be taken into consideration when participating in these services at any time, but particularly if and when identifying themselves as employees of BLM or when context might lead to that conclusion.

Individuals who identify themselves as BLM employees, or who in context might seem to be representing the BLM, should provide the following disclaimer, either in profile or in comments, that indicates the employee is not speaking on behalf of the BLM: "This is my personal account. The views and opinions expressed here do not represent the views or official positions of the BLM or the Department of the Interior."

Access Across the BLM Network

At present, only individuals identified in the DOI Social Media Pilot have access to approved social media websites across the BLM network. The Social Media Pilot is reserved for select Public Affairs, Law Enforcement, and IT staff, and only for the purposes of conducting official BLM business. The BLM's Acceptable Use Policy applies, and employees may not engage in personal activity on public social media sites. No exception or waiver process exists for access across the network.

Comments and Interaction

Consistent with DOI policy, the BLM will allow all comments on public social media pages and will not alter or edit them in any way, except under certain instances noted below. Authorized BLM employees maintaining public social media pages should frequently monitor pages and delete comments pursuant to the disclaimer below (which must appear on all BLM public social media pages):

"We welcome your comments and hope that our conversations here will be useful, informative and courteous. You are fully responsible for the content of your comments.

We do not discriminate against any views, but we reserve the right to delete any of the following:

• violent, obscene, profane, hateful, or racist comments

• comments that threaten or defame any person or organization

• solicitations, advertisements, or endorsements of any financial, commercial, or non-governmental agency

• comments that suggest or encourage illegal activity

• multiple, successive off-topic posts by a single user

• repetitive posts copied and pasted by multiple users"

Comments in clear violation are to be deleted. When in doubt, employees should coordinate with State EA Chiefs or Washington Office Division of Public Affairs (WO-610). Refer to Attachment 1 for policies on responding to comments.

Site-Specific Guidance

I. Facebook:

A. National Pages

National Page: The BLM will establish a National Facebook page. This page will be managed and maintained by WO-610.

Programmatic Pages: BLM National program pages will be managed and maintained by the Washington Office Division of Public Affairs. Programs will be selected based on the following criteria: level of national interest, amount and quality of information to be provided, potential for significant public engagement, and potential for advancing the mission of the BLM. The Communications Directorate will work in conjunction with the Executive Leadership Team (ELT) to determine which programs will have Facebook pages.

B. State Pages:

As resources permit, State Offices should focus resources on thorough implementation of a few interactive and innovative pages rather than establish pages for all units. States are encouraged to post photos, event descriptions, trivia, and other interactive content as resources permit.

State and Center Pages: Each State and Center is encouraged to maintain a Facebook page. WO-610 staff will establish these pages upon request from State/Center EA Chiefs, pursuant to DOI guidelines, and will implement the BLM's branding on the pages. State pages will be administered by the State EA Chief, who may delegate to state EA staff who are granted access under the DOI Social Media Pilot. This authority may not be delegated outside the State Office EA staff. State/Center pages should post State and National news releases and are encouraged to post photos, event descriptions, trivia, and other interactive content as resources permit.

District/Field/Unit Pages: States may maintain Facebook pages for District and Field Offices, and other units within the State. Per DOI policy, State EA Chiefs should request approval from the Division Chief of BLM Public Affairs for establishing District/Field/Unit pages. Only designated staff in the State EA Offices may maintain the page on behalf of the BLM, and this authority will not be delegated outside the State Office EA staff. When the EA Chief requests creation of a page, he/she may request that the District/Field/Unit Manager and/or EA Officer for that page be included in the Social Media Pilot to view pages. Maintenance may not be delegated outside the State/Center EA Office.

II. YouTube

The BLM will maintain a National YouTube channel. State/Center EA Offices are encouraged to maintain YouTube channels for the State/Center Offices. Policies for branding/governance of the BLM's YouTube presence were established by IM 2010-038, "Use of and Branding in YouTube," which is incorporated in this IM.

III. Twitter

The Washington Office Division of Public Affairs will establish and maintain a National Twitter account. This account will be used to send news releases, highlight web pages and BLM initiatives, and disseminate other information as appropriate.

States, Centers, and National programs wishing to use Twitter at any level within the organization for business purposes are to develop a proposal as soon as practicable, but no later than June 1, 2010. This proposal must include: summary of target audiences, number/position of employees needing access, areas of discussion, plan for content approval, description of value-added for the BLM and publics, discussion of risks and how these risks will be mitigated, and impacts of denial. Because of the nature of Twitter, it is possible that certain employees outside the public affairs offices may be granted access. Proposals are to be sent to the AD-600, who will work with appropriate leadership at the BLM and DOI in assessing proposals and establishing accounts.

IV. Flickr

The Washington Office Division of Public Affairs will establish and maintain a National Flickr account. States and Centers may operate Flickr accounts consistent with policies established in IM 2010-038. Requests for accounts are to be sent to the AD-600.

Timeframe: This IM is effective immediately.

Background: DOI and BLM leadership recognize that social media are important communications tools and therefore have directed that these policies be established. To mitigate risks associated with social media, it is expected that State and Center Directors will be leaders in this effort. All employees should help assure that the potential of these communications tools is fully realized without inadvertently compromising the BLM's professional, legal, or ethical standards.

DOI policy (available on the BLM Communications intranet site) establishes the AD-600 as the BLM point-of-contact for all social media websites. A single point-of-contact (POC) is needed to ensure that page creation is coordinated with the appropriate Federal contacts and that duplicative pages are not created. Additionally, because our use of approved social media websites is governed by terms-of-service (TOS) agreements negotiated between the websites, the General Services Administration, and DOI, the AD-600 must ensure that the correct TOS are applied to each BLM instance. DOI policy states that all pages not established through the AD-600 will be removed by the DOI.

At a minimum, the BLM's presence on Facebook will allow us to be searchable on the site and direct users to our website. We can syndicate our news feed onto our Facebook page, add photos, and republish video to our Facebook page with minimal labor resources. Additionally, we can link to, and be linked by, other Federal/State agencies and organizations with which we have formal partnerships. The BLM's Facebook presence will also allow for the establishment and fostering of fan bases and increased interaction with our publics. The bulk of this interaction and innovation is expected to occur on local pages for NLCS units, recreation areas, etc. State Directors are encouraged to work with EA Chiefs in identifying the areas to pilot local Facebook pages.

Twitter is a social networking and "microblogging" service that allows users to send and receive short 140-character messages known as tweets. Tweets are displayed on the author's profile page and delivered to the author's subscribers (followers). Twitter has over 22 million users.

Research found that instant messaging systems like Twitter did a better job of disseminating information during emergencies than traditional media or government emergency services. Those using Twitter during the October 2007 California fires kept their followers informed of the location of various fires minute by minute. The American Red Cross started using Twitter to exchange minute-to-minute information about local disasters, including statistics and directions.

YouTube and Flickr are multimedia social media outlets that allow for the posting of videos (YouTube) and photographs (Flickr). Both sites will allow the BLM's multimedia to reach a wider audience than the traditional webpage.

Budget Impact: Use of social media is anticipated to have minimal-to-moderate budget impact, with the burden on the National and State/Center EA Offices.

Manual/Handbook Affected: None.

Coordination: This IM was coordinated with the Deputy Director for Operations, the Information Resources Management Directorate, the BLM Communiqué Change Management Board, the DOI Office of New Media, and BLM EA Chiefs.

Contact: For policy guidance concerning electronic communications, please contact Jeff Krauss, Division Chief for Public Affairs, at 202-912-7410. For technical questions regarding access to social media sites across the BLM network, please contact Lisa Lindholm, Division Chief for IT Security, at 202-912-7590. For all other questions, please contact Kaveh Sadeghzadeh, Public Affairs Specialist, at 202-912-7423, or Peter Ertman, IRM Advisor for Communications, at 202-912-7447.

Signed by:

Mike Pool

Deputy Director, Operations        Authenticated by:

Robert M. Williams

Division of IRM Governance,WO-560

February 2012

http://www.blm.gov/socialmedia