



STATE GUIDELINES



Social Networking Media



Combining technology and
social interaction to
create value.



August 2010

(v.2)



DAS
DEPARTMENT OF
ADMINISTRATIVE
SERVICES

Disclaimer: The purpose of this publication is to provide guidelines and suggestions to assist agencies in designing and maintaining their social networking accounts. Though this publication does not contain formal rules or government policies, DAS' ongoing development of formal policies will likely utilize the principles and suggestions that this publication contains. DAS encourages agencies to follow their respective existing policies in setting up and maintaining social networking accounts. Also, DAS strongly urges agencies to utilize state-owned e-mail accounts — not private personal accounts — when registering on social networking Web sites. Social media is constantly changing. The information in this document includes dates, where possible, with links to current Web sites.

Table of Contents

To go directly to a page, hover your mouse over the heading, hold down the CTRL key and click your mouse.

Purpose and Introduction	3
New Media Trends.....	3
Social Media Categories and Uses.....	5
Guiding Principles	6
Finding Your Social Media Voice.....	6
Rules of Engagement.....	8
Questions to Ask Yourself.....	10
Public Records and Moderation	12
Public Records.....	12
Public Meetings.....	12
Moderating Content.....	13
Blogs	14
Five-point checklist.....	14
Blogging forum.....	14
Reducing the Risks.....	15
Prohibited activities.....	16
Best Practices for Bloggers.....	16
Blog Public Notices, Policy and Record Retention.....	16
Moderating the Content.....	17
YouTube, Twitter, Facebook, Photo-sharing	18
Appropriate Uses of Twitter, Facebook and YouTube.....	18
YouTube.....	19
Facebook.....	22
Twitter24.....	
Flickr, Picasa.....	26
Other Popular Social Media Web Sites.....	28
Section 508 Compliance (Accessibility)	29
Measurement and Evaluation	30
Search for answers to these questions.....	30
Defining the return on investment in your social networking effort.....	31
Terms of Service Agreements	32
Privacy, Security and Risk	33
Viruses and Malware.....	33
Hijacking.....	34
Unauthorized mobile access.....	34
Privacy.....	35
Security.....	35
The Risks.....	36
Glossary	38
Frequently Asked Questions	44
Resources	45
Addendum: Article	46
Contacts	47

Purpose and Introduction

The Department of Administrative Services offers this guide to facilitate use of social media tools, or “Web 2.0,” by state agencies. Such tools can ease collaboration and information-sharing among agencies and the public they serve. DAS’ goal is not to limit the use of social media Web services; rather, our goal is to provide effective and appropriate guidance on security, privacy controls, best practices, and other important issues. Use this guide to complement your agency’s internal plans for communications and community and media relations.

Social media technology gives agencies the opportunity to inform the media, the public and each other on matters of immediate importance. By using highly accessible Internet-based tools, users can create content and engage in peer-to-peer conversations and exchanges (e.g., Blogger, Twitter, YouTube, Flickr, Facebook, etc.).

No substitute exists for good writing, however. The best public servants appreciate that writing well is not a tiresome duty, but a necessity. We hope this guide helps you fulfill this necessity.

The decision to utilize Web 2.0 technology should be a business decision that comes from the appropriate level of your agency. The decision-maker should consider the agency’s mission, objectives, capabilities and potential benefits. If you are a state employee or contractor who creates or contributes to blogs, microblogs, wikis, social networks, virtual worlds, or any other kind of social media both on and off the oregon.gov domain, these guidelines are applicable. State government expects all who participate in social media on its behalf to understand and follow these guidelines.

New Media Trends

According to a December 2008 survey from World Internet usage Statistics News and Population Stats, approximately 1.5 billion people currently use the Internet around the world (www.internetworldstats.com/stats.htm). Web sites, e-mail, blogs, tweets, videos and images, message alerts, instant messaging, Facebook, voice chat, and other Internet-based technologies have begun to overtake the traditional media as primary information sources for a growing share of the world population.

Because of this trend, a major push is under way in government to provide information directly to the public via online media, rather than rely exclusively on traditional media. These media enable agencies to create an open and transparent environment while speeding delivery of important information to the public.

Consider these statistics:

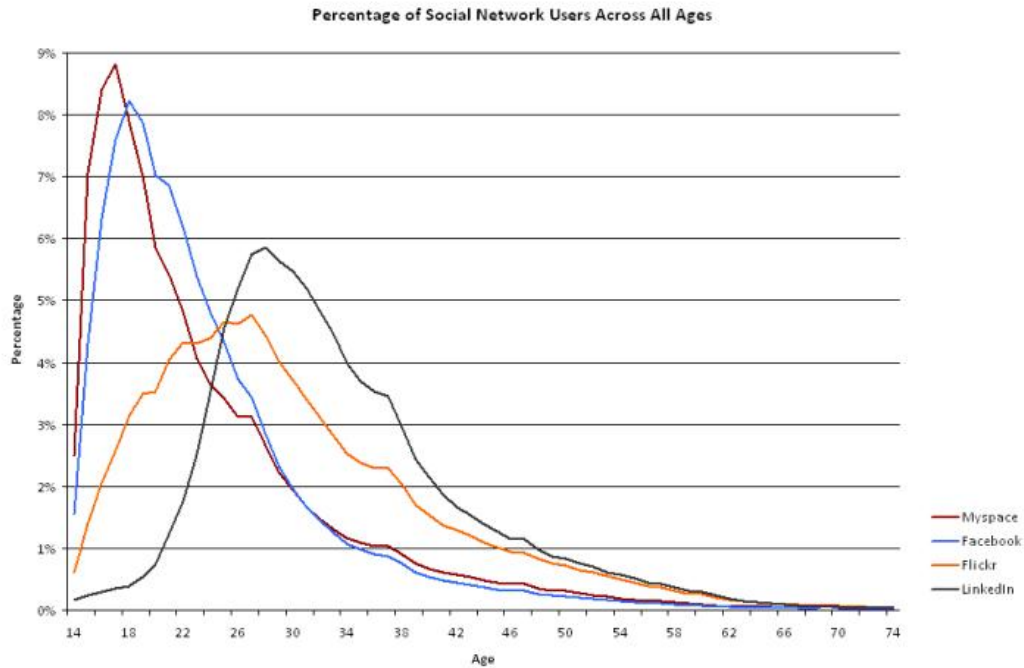
Social Media	Unique Worldwide Visitors
Bloggers	222 million
Facebook	200 million
MySpace	126 million

In addition:

- One in five Americans has listened to an audio Podcast.
- One in three Americans has set up a profile on a social networking site. More than 40 percent of these people visit their sites at least once a day.

- As of February 2009, Twitter had seven million unique visitors.
- As of March 2009, YouTube had 89 million unique viewers in the U.S.

The table below shows that as of June 2008, some social networks have a greater appeal for specific age groups. (from <http://www.newmedia.hhs.gov/resources/socialmedia101overview06-29-09.pdf>, 2009)











(excerpted from: *Social Media 101 Overview: The What and the Why*, 11/2009)
<http://www.newmedia.hhs.gov/resources/socialmedia101overview06-29-09.pdf>

Social Media Categories and Uses

(excerpted from: *Social Media 101 Overview: The What and the Why*, 11/2009)

<http://www.newmedia.hhs.gov/resources/socialmedia101overview06-29-09.pdf>

Category (Example)	Generally appropriate for...	Generally NOT appropriate when...
Aggregators  (Digg)	Increasing the reach of a blog or other often-updated public site	Used to promote a static Web site
Blogging  (WordPress)	Telling a story, i.e., narrative writing (about a finite event or an ongoing issue/project)	There aren't resources or content to post regularly
Content Syndication  (RSS)	Sharing Web site content with others, highlighting often-updated site content	Used to promote a static Web site
Microblogging  (Twitter)	Providing real-time updates; obtaining feedback; interacting at conferences, etc.	There aren't resources to participate regularly (as in posting and responding)
Photo Sharing  (Flickr)	Engaging with stakeholders and building community (e.g., for a specific event)	There aren't resources to post photos of your work
Social Bookmarking  (Delicious)	Sharing multiple links with stakeholders (see Aggregators too)	Used to promote a static Web site.
Social Networks  (Facebook)	Engaging with stakeholders and building community; obtaining feedback	There aren't resources to participate regularly (as in posting and responding)
Video Sharing  (YouTube)	Broadcasting events, interviews, tutorials, etc.; building community	The content could be expressed in a podcast (aka "talking head syndrome")

Guiding Principles

To understand and successfully engage Web 2.0 applications and Internet audiences, agencies will likely need to adopt new media policies. Remember that anytime you use a Web 2.0 application, you represent your agency. As an “e-ambassador” for your agency, you have an obligation to provide reliable and accurate information, and you must not publish anything that discredits the agency or the state.

Agencies should enforce certain restrictions to ensure consistency, safety and effective communications. If you use any social media, follow these guiding principles:

- Ensure that your agency sanctions official participation and representation on social media sites.
- Stick to your area of expertise; provide unique individual perspectives about what’s happening in state government.
- Post meaningful, respectful comments; never post spam, off-topic information or offensive remarks.
- Pause and think before posting. Reply to comments in a timely manner.
- Respect proprietary information, protected content and confidentiality.
- If you must voice disagreement with others’ opinions, do so appropriately and politely.
- Know and follow Oregon’s “Acceptable Use of State Information Assets” policy: <http://oregon.gov/DAS/EISPD/ESO/Policies.shtml>
- Follow applicable agency social media policies.
- Be careful when using “Tiny URLs” (see Glossary). You don’t always know where they will take you when you click on them. Some agencies choose not to use them or click on them. Sometimes Twitter makes them automatically. Though they are usually safe, consider that others might not use your tiny URLs.

Finding Your Social Media Voice

A strong organizational voice is essential to communicating your agency’s story. Your voice is a major component of your agency’s brand identity. Just as Oregon’s Web sites capture a consistent look and feel with colors, style and formatting, so should your agency’s voice be consistent in tone, style and texture. Your agency’s voice appears in the following forms:

- News releases
- Brochures
- FAQs
- Web content
- Customer service
- E-mails
- Social Media (Tweets, Facebook, YouTube, Blogs)

A consistent voice communicates value, authority, energy, professionalism and personality.

Challenges of social media:

- Rapid communicating in ‘real-time’ scenarios
- Frequent changes that require new processes and training (e.g., Facebook frequently changes its format)
- Multiple formats featuring unique benefits and challenges (e.g., Facebook and YouTube are flexible and fluid; Twitter is not)

Who are you? Your voice must accurately reflect your agency and its mission. Answer these questions to ensure that your voice is authentic and deliberate:

- Do you represent an agency or program?
- What is your mission? What are you trying to accomplish? (Base your content on your mission and goals.)
- What unique information do you have to offer?
- Why are you speaking? (To persuade? To educate?)
- Why do you want people to subscribe to your updates?
- How long will your agency or program exist?

Who is your audience? Your language, content and tone should flow from knowledge of your audience. Answer these questions to ensure that your voice is appropriate to your audience:

- Whom do you want to reach?
- Who wants to hear from you?
- What are your audience’s top tasks?
- How does your audience prefer to communicate?
- What do people expect from you? (Humor? Knowledge? Professionalism?)
- Why do people subscribe to your updates?

Use plain language. Always write clearly. Use language and terminology that mean something to your audience. Clear and direct language is always good.

- Facebook and Twitter updates require “vigorous writing,” careful editing and precise word choice.
- Focus every update on a single topic.
- Social media updates must compete with a lot of other information; make yours clear and valuable.
- Short form communication is here to stay.
- Posting too often annoys users. Find a balance in how often you post.

Match your language to your voice. Strengthen your multimedia (video, photos, podcasts) content with clear and explanatory titles and descriptions. Remember your audience when writing titles and descriptions.

- What do they need to know about your content?
- Why does your content matter to them?
- Seek to use keywords in titles and descriptions to facilitate discovery through search.
- Content titles and descriptions and video scripts are opportunities to reinforce your voice.

What do you talk about? Communicate value by providing useful information to your audience. Common types of content include:

- News updates
- Research findings
- Public service announcements
- Emergency notifications

How often do you communicate?

- Which activities merit official communications?
- How long does it take to create an official communication?
- How many people have to edit and approve official communications?

Your social media voice allows you to communicate faster, more personally, and more directly with your audience:

- Be authentic. Stay true to your mission and audience.
- Be timely and relevant. Social media operates in real time.
- Be social. Social contexts require that you sound more casual and human. Get to the point quickly.
- Speak directly to your audience. Don't speak about them; speak to them (i.e., don't tweet to a media outlet, tweet to your customer)
- Be consistent and flexible. A consistent voice allows your followers and fans to build a relationship with you over time.
- Avoid social media jargon. Social media may require some abbreviations and new syntax, but being understood is paramount. Keep acronyms to a minimum.

The Three "T's"

- *Train* your employees who will use the social media tools.
- Give them access to the *tools* they will need.
- *Trust* them to do the right thing.

Rules of Engagement

Social networking can help you build stronger, more successful professional relationships by enabling you to take part in global conversations about the work your agency does and the goals it pursues.

As you start to use these tools, strive to address the following factors:

- **Transparency:** Savvy users can quickly detect dishonesty in the social media environment. If you blog about your work in a state agency, use your real name, and be clear about your role. If you have a stake in the issue under discussion, be the first to point it out.
- **Judiciousness:** Don't let your efforts to be transparent cause you to violate the state's guidelines on privacy and confidentiality. Follow all applicable legal rules that govern external communication. Get permission to publish or report about conversations that may not be "public information." Verify the accuracy of any statement you make, and take care not to mislead. Make no claims you cannot substantiate. Never comment about legal matters, litigation, or any parties against whom the state may have lawsuits. If you want to write about other government entities, know what you are talking about and obtain appropriate approval before doing so. Be smart about protecting your agency, your privacy, and any sensitive or restricted information. Everything you publish in a social medium is widely accessible, and you cannot easily retract it. Your posts are likely to be around for a long time.
- **Expertise:** Do not comment outside your sphere of expertise. If you must write about a state concern that is outside your "lane," make this clear to your readers at the beginning. Write in the first person. If you publish to a Web site outside the state, use a disclaimer (e.g., "The postings on this site are my own and do not necessarily represent state government's positions, strategies, or opinions."). Respect brands,

trademarks, copyrights, fair use, disclosure of processes and methodologies, confidentiality, and financial disclosure laws. Remember: You are personally responsible for the content you post.

- **Perceptions:** When you identify yourself as a state employee, you create perceptions about your expertise and state government. Customers, legislators, stakeholders, business partners and interested citizens will form opinions about you and your agency, based on the content you post in the social media. Ensure that your content conforms to state government’s values and professional standards.
- **Tone:** Talk to your readers as you would talk to people in professional situations. Avoid overly “composed” language. Express your own personality, and say what’s on your mind. Offer content that invites response, and encourage comments. Broaden the conversation by citing comments from others about the same topic, and allow your content to be shared or syndicated.
- **Enthusiasm:** Share your agency’s enthusiasm and vision, and open channels to learn from others. The State of Oregon makes important contributions to our communities and the state, to the future of government, and to public dialogue on a broad range of issues. We provide services that benefit citizens and stakeholders throughout society. Use the social media to share information about what we do, and what we have learned.
- **Value:** The social media offers access to a staggering volume of written items, each of which competes for attention. The best way to get your post read is to write things that people find valuable. Communication from state government should help citizens, partners, and co-workers. Strive to be thought-provoking. Build a sense of community. If your post helps people improve their knowledge or skills, build businesses, do their jobs, or solve problems, it qualifies as *valuable*. Word will get out, and people will read it.
- **Diplomacy:** A fine line separates healthy debate from incendiary argument. Never denigrate others. Remember that you need not respond to every criticism or barb. Frame what you write to invite differing points of view without inflaming others. Some topics, like politics, are sensitive territory. Be careful and considerate. Once you put your words out there, you cannot pull them back.
- **Responsibility:** What you write is your responsibility. Participation in a social media network on behalf of the state is not a right—it’s a privilege and an *opportunity*. Treat it seriously. Follow the terms and conditions of any third-party sites. Go to the “Terms of Service” section in this document for more information.
- **Pause:** If you are about to publish information that gives you even slight discomfort, stop. Take a minute to review these guidelines. Identify what bothers you and fix it. You might want to discuss it with your manager. Ultimately, what you publish is yours, as is the responsibility for having said it. You will own the repercussions.
- **Mistakes:** If you make a mistake, admit it. Be upfront, and be quick with your correction. If you have posted to a blog, you may choose to modify an earlier post. Make it clear that you have done so.

Questions to Ask Yourself

Why engage in social networking?

A social medium—say a blog—lets you create a channel of communication between your agency and citizens you may not otherwise reach. A blog can be an effective method of explaining projects, policies, procedures, programs and perspective to citizens and the media.

The cost is measurable in employees' time (proportional to the use of the blog). The more people use it, the more resources the blog will require, but the cost is worthwhile if it enables the agency to meet the citizens' needs.

Things to consider:

- What is your agency's policy on the use of new media?
- What other divisions within your agency currently use (or plan to use) these tools?
- Do opportunities exist for a coordinated approach within the agency?
- Why will someone choose to read your blog, subscribe to your podcast, or regularly visit your Facebook page when the Web provides so many informational alternatives?
- Who will provide content? Do you have enough good material to post two to three times a day? Such material should include links to other sites, news stories, etc.
- Who is your target audience?
- What will drive traffic to your product? Does your planned content have the elements that drive Web traffic?
 - Is it relevant and timely?
 - What's in it for the reader?
 - Is it on topic, valuable and worthwhile?
 - Is it original, funny, scary, exciting?
 - Is it visual?
- Who will edit your online content? Have you designed an approval process that allows your team to post information quickly?
- Can you post throughout the day and possibly the night?
- What happens when the news is bad? Will your organization still post? More importantly, will you post more frequently?
- Any social medium requires someone to monitor it and filter the information from posters. Have you designated someone to do the monitoring? Who will decide what to filter?

- Will your communications sound personal rather than bureaucratic? Use a personal voice. Be authentic, original, and fresh.
- Is your organization willing to undertake a multi-year commitment with little or no guarantee of immediate return?
- Linking is important. To whom will you link, and what limitations will you set for adding more links? Will you only link to .gov sites? Give serious thought to the propriety and advisability of linking to any non-government site.
- Many Web 2.0 applications are inherently interactive. Are you prepared to answer questions? By definition, blogs, for example, are dialogues, not monologues. Are you ready to host a debate on your blog?
- How will you evaluate the effectiveness of your efforts? Can you track readership to determine which posts receive the most attention? Does your social media account show up on Google and other search engines?

Public Records and Moderation

Like other forms of communication, social media posts are public records. That means they require you to retain them. They are also covered by the First Amendment to the U.S. Constitution and the Oregon Constitution. Agencies that use social media must understand that they will need to retain content and decide whether to moderate comments that appear on their sites.

Launching any type of social media involves the following categories of information:

- Public Records
- Public Meetings
- Content Moderation

Public Records

- Be aware that content posted on social media sites may become the property of the vendor.
- Work with your records retention staff to determine whether the social media material is an official public record and whether it requires retention. The safest alternative is to avoid posting original records. Make sure you only post content that you retain somewhere else (e.g., press releases or articles that have appeared in a newsletter or on your website).
- Comments posted on your site also require retention.
- If employees post comments on other social media sites as part of their job, they should archive locally anything that requires retention.
- For comments and other materials that require retention, your options for purchasing third-party software include:
 - <http://advisormail.com>
 - <http://arkovi.com>
 - <http://www.cloudpreservation.com/>
 - <http://socialmedia.com>
 - <http://www.smarsh.com>
 - <http://www.zlti.com>
- Agencies should establish written procedures that guide how they will retain social media content. The procedure should address items such as:
 - What social media content constitutes a record
 - What method the agency will use to capture and store the records
 - Who is responsible for capturing and storing records
 - How long the records must be archived
 - If using a vendor, how the records will be backed up

Public Meetings

- Members of boards or other governing bodies should exercise caution when using social media tools. Simultaneous texting or tweeting among board members may constitute a public meeting.
- Refer to the public meetings manual for more guidance:
 - http://www.doj.state.or.us/pdf/public_records_and_meetings_manual.pdf

Moderating Content

- Post a comment policy statement, such as: “The state does not endorse the opinions expressed on this site.” (*See draft policy, below.*) Do not enable comments without a comment policy.
- Removing or not posting comments may be illegal under the First Amendment and/or the Oregon Constitution. Understand the risks before removing any content.
- Refer to the State Guidelines for Social Networking Media for tips on mitigating negative comments.
- If your agency is uncomfortable with the responsibility to moderate posting, you may wish to consider disallowing the posting of comments altogether. Keep in mind, however, this is not a recommended best practice for conducting social media outreach. We recommend each agency evaluate its ability to moderate content (e.g., time allowance, good judgment, etc.) when making this decision.

Agencies may wish to publish the following (or modified) terms of use and moderation policy on their social media pages:

Terms of Use and Moderation Policy

State of Oregon agency content and comments containing any of the following forms of information should not contain:

- *Comments not topically related to the particular content*
- *Profane language or tone*
- *Harassing language or tone*
- *Content that promotes, fosters or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation*
- *Sexual content or links to sexual content*
- *Solicitations of commerce*
- *Conduct or encouragement of illegal activity*
- *Information that may tend to compromise the safety or security of the public or public systems*
- *Content that violates an ownership interest of any other party*
- *Promotion or opposition of any person campaigning for election to a political office, or promoting or opposing any ballot proposition unless specifically authorized by the agency director*
- *Disclosure of information that an agency and its employees must keep confidential by law or administrative rule*

Content or comments of this nature found on a state agency’s social media site will be edited, revised or removed from the site. Only comments that comply with this standard will receive approval by state agency staff for posting.

Communications made through social media will in no way constitute a legal or official notice to the state of Oregon or its agencies or any official or employee of the state of Oregon for any purpose.

Use of this website constitutes acceptance of this policy. Any information posted here is public information and may be subject to monitoring, moderation or disclosure to third parties.

Blogs

Your agency might decide to start with one blog as a pilot. Employees who propose a new blog should develop a “decision document” to support the proposal. They should then seek the approval of a supervisor, an internal governance committee or the agency PIO.

Five-point checklist:

1. What type of blog do you propose? What’s the specific project/area/topic/event it will cover?
2. What purpose will it serve? How does it benefit the agency and/or citizens?
3. How will the blog supplement, complement, replace or compete with current blogs?
4. Who will form the team of blog post authors? Editors? Moderators?
5. What’s the expected lifetime of the blog?

Posting team: You may want to create a “posting team.” Any member of the posting team could submit possible blog postings. The team should operate with the following guidelines:

- To receive consideration, each post must bear the author’s signature. Editing by someone other than the original author is a good thing—something you should encourage. Full ghostwriting of entries, however, is *not* a good thing. The posting team should disallow submission of ghostwritten entries.
- Choose the people who would be the primary authors of posts.
- Except for general editing, the less filtering that occurs between the subject matter expert and the public, the better, as long as the author understands that he or she is acting in an official capacity and is writing for the agency, and not as an individual speaking personal opinions.
- The agency PIO should be the final authority in deciding whether to approve the team’s recommendations for posts.

Blogging forum: Blogging forums improve communications among employees, government customers, commercial suppliers and the public. Consider the following suggestions on how to establish and maintain a state-sponsored blog.

Create a blog request form that starts the process of setting up a blog. Require submission of the form to the agency’s public information officer. Include the following elements in the blog request form:

- Title for the blog
- Short statement about the purpose and value of the blog
- Desired URL shortcut (typically some variation of the unique blog name, but in all lower case, no spaces, no special characters, e.g., /daspablog)

The agency PIO should consult with the affected managers to determine whether to approve the request to start a blog.

Monitoring the blog is the responsibility of the blog owner. The owner must ensure proper supervision of the blog, and that the information it provides is accurate, timely, relevant, and complete. This responsibility includes de-activating the blog upon the blogger's termination. Immediately notify the agency's PIO if ownership-responsibility for the blog transfers to another person.

Reducing the Risks: Blogging involves risks. Here are some ways to reduce them.

Risk	Risk Reduction Technique
<p>Negative Comments</p> <p>Readers offer very negative, even crude comments.</p>	<ul style="list-style-type: none"> ■ A clear, consistent comment policy can counter off-base, rude and obscene comments. ■ Monitor comments constantly. Utilize notification software. ■ Allow both positive and negative posts, thereby building trust among the public. ■ Use the blog to address negative issues.
<p>Loss of message control</p> <p>Participants find ways to short-circuit the process of screening and vetting public statements; or multiple agency-authors post messages that are inconsistent or conflicting.</p>	<ul style="list-style-type: none"> ■ Communicate regularly with agency posters to ensure they stay on message. ■ Ensure that moderators are attentive and proactive in addressing posts that get around screening and vetting.
<p>Firestorm</p> <p>The blog becomes a forum for attacking the agency. Lack of understanding and/or failure to follow the rule of transparent authorship creates a firestorm.</p>	<ul style="list-style-type: none"> ■ Maintain a clear, consistent policy on comments to deter off-base, rude and obscene comments. ■ Monitor comments constantly. Utilize notification software. ■ Allow both positive and negative information to be posted, as long as the post is thoughtful and within the bounds of civilized discourse. ■ Use the blog to address negative issues. ■ Require all blog postings from the agency employees to be signed (name, title) ■ Regularly remind agency employees who write blog postings to remember that they speak for the agency, not themselves personally. They are spokespeople for the state.
<p>Neglect</p> <p>Employee has trouble monitoring or writing for the blog while still performing other duties.</p>	<ul style="list-style-type: none"> ■ Designate more than one person to administer the blog. ■ Employ a number of blog post writers (subject matter experts).

Prohibited activities: Do not allow the blog or its contributors to engage in the following activities:

- Use of vulgar or abusive language, personal attacks of any kind, or offensive terms targeting individuals or groups
- Endorsement of commercial products, services, or entities
- Endorsement of political parties, candidates, or groups
- Violation of the posting requirements and disclaimers contained in this guide
- Violation of Section 508 (ADA)-compliant postings

Best Practices for Bloggers:

- Blogs succeed when visitors feel they have reached a trusted source of information. Let readers know the blogger's identity and qualifications as a professional. Do not release any personal information (e.g., home addresses, residential phone numbers, etc.).
- Post content on a regular basis. This may mean daily or weekly, but not less frequently than every two weeks. Publicize the posting schedule. Be realistic in preparing a schedule. If a blog remains idle for 60 days or more, consider taking it offline.
- Make time and devote resources to moderating all comments that readers post. Commit to reading every comment received, even if you do not post individual responses to all of them. You may need time to research responses. Communicate to the audience the timeframe for responses.
- Invite guest contributors. This is a great way to enhance value without increasing workload. Announce the names of the contributors, and provide some information about each.
- Respond on the blog to the posted comments, especially negative ones. Blogs build credibility and readership if readers see them as open, accessible and responsive.
- If the same questions occur repeatedly, create boilerplate responses to some questions.
- People will find the blog in a variety of ways (e.g., via search engines, search and other e-mail alerts, RSS feeds, various social networking sites, book marking sites, or e-mail from another person). Visitors will often read only a headline (or title), or a headline and several opening sentences. The more intriguing and relevant the headline and the content that follows, the more likely the content is to build readership.

Blog Public Notices, Policy and Record Retention:

- All state blogs must contain a public notice. Example: *“The Department of Administrative Services manages this blog to improve communications with our employees, customers, commercial suppliers, and the general public. This blog will discuss [Subject matter of blog, e.g. information technology, schedules, communications, building issues, etc.]. Our use-policy is subject to amendment or modification at any time to ensure the blog’s continued use is consistent with its intended purpose as a limited forum.”* If the notice itself does not appear on the main page, then place a prominent link on the blog homepage that clearly identifies the attachment as “Privacy, Security and Legal Notice.” You may customize your public notice to meet your agency’s specific needs as they relate to the blog.

- All records—including information posted, received or connected in any way with state blogs that meet the definition of a record—will be subject to Oregon’s Public Records Law.

Moderating the Content:

“Moderating” means reviewing and approving content before it appears on the site. The state does not endorse or take responsibility for content posted by third parties. All users, however, must abide by accepted terms, conditions and code of conduct.

Publishing un-moderated content may generate serious liability for the state.

In some social media formats such as Facebook, Blogs, Twitter responses, etc., you may encounter comments that cause concern. If user-posted content adheres to context of the conversation and meets the standards of courtesy, then allow it to appear, regardless of whether it is favorable or unfavorable to the state. If the content is ugly, offensive, denigrating and completely out of context, do not allow it to be posted. If hurtful, insensitive comments are the norm on a particular subject, consider closing the story to any comments.

Most blogging software automatically notifies blog administrators of new post submissions, thus eliminating the need to manually check the blog. We suggest the agency create a group mailbox to receive comments. Designate someone to be responsible for monitoring the mailbox and screening comments. Encourage submissions within a reasonable timeframe (one or two business days) during regular business hours.

Automatic blog-monitoring mechanisms, such as Bloglines, Google or Technorati, can help you monitor blog posts. Using such tools can help make you aware of the issues that concern your audience. They can also help you track comments about your agency’s policies, procedures, programs and projects.

YouTube, Twitter, Facebook, Photo-sharing

Always consult your supervisor on terms of use agreements with social media sites (also, see the “Terms of Service” section in this document.)

Following are guidelines from some popular social media Web sites:

- **YouTube** http://www.youtube.com/t/community_guidelines
- **Twitter** <http://twitter.com/tos>
<http://twitter.zendesk.com/forums/26257/entries>
- **Facebook** <http://www.facebook.com/terms.php?ref=pf>
- **Flickr** <http://www.flickr.com/guidelines.gne>
- **Picasa** <http://picasa.google.com/web/policy.html>

It’s important to do some investigating before you start using Twitter, Facebook, YouTube or any other social media tool. Your investigation should include the following elements:

- Spend time learning about the tools
- Find out if your customers are using them.
- Investigate the time commitment needed.
- Examine how public records laws come into play
- Consider accountability and transparency issues with your team.
- Determine whether these tools would help meet your existing communication objectives.
- Work with your information technology systems section to balance your ability to interact with these sites with your agency’s network and information security protocols.

After thorough investigation, begin using these sites on a trial basis to enhance your existing communication plan. Start slowly and take small steps, evaluating your results along the way. Continue to interact with your executive leadership team to tackle such issues as who has authority to speak for the agency on these sites.

Appropriate Uses of Twitter, Facebook and YouTube

Use these social media tools to:

- Listen to and learn from customers, peers, stakeholders and others.
- Enhance existing messages.
- Share information with customers.
- Build relationships with customers.
- Reach a group of customers who you may not have reached before. For example, ODOT now has “followers/friends/contacts” that became interested in the agency because of their photos and videos—not because of a specific transportation-related issue or concern.
- Gather feedback, do research, monitor issues.
- Direct customers to services, resources or other sources of information.

Do not use these social media tools in the following ways:

- Do not participate just to say that you are participating. Establish a business reason that justifies using these tools.
- Do not use these programs just to hear yourself talk. These are not one-way communications.
- Do not falsify or hide identities to advocate for issues or programs.
- Do not use these programs and sites for personal benefit.
- Do not use inappropriate language.

YouTube (<http://youtube.com>)

What is it?

YouTube is a privately owned video-sharing Web site that lets users upload and share videos. You can organize YouTube content in three ways: YouTube channels, groups and playlists.

- **Channels:** An agency may acquire its own YouTube channel. Benefits include (1) ownership and (2) interaction. Users are more likely to identify with and interact with a Channel with a narrow focus. A channel requires a substantial commitment of time and resources to maintain -- a definite con.
- **Groups:** A group enables a user to browse all the videos of the agency by creating a defined content space within which each YouTube content manager maintains control. A group may be organization-specific. If an agency does not have its own channel, it could use a group within another larger channel to house its content. The group may also be topic-specific. Groups are often useful for specific campaigns that involve interaction with other YouTube users. You can structure a campaign group to let anyone join, upload content, and interact with other group members through discussions.
- **Playlists:** Channels can house multiple video playlists. When a user watches a video that is part of a playlist, the entire playlist appears next to that video. Playlists, therefore, can be a key way to maintain viewership and increase the visibility of other videos.

What can I do with it?

You can use YouTube's Adobe Flash Video technology to display your own video content, including movie clips and TV clips, as well as video blogging and short original videos. CBS, the BBC, UMG and other companies and government agencies offer material on the site. Unregistered users may watch the videos, while registered users can upload an unlimited number of videos. In general, YouTube lets you use video to tell your agency's story.

Many variables can be controlled within individual postings and within channels as a whole. These variables often become modified or removed as the YouTube service grows, while others are added. Here's a sample of the wide variety of variables:

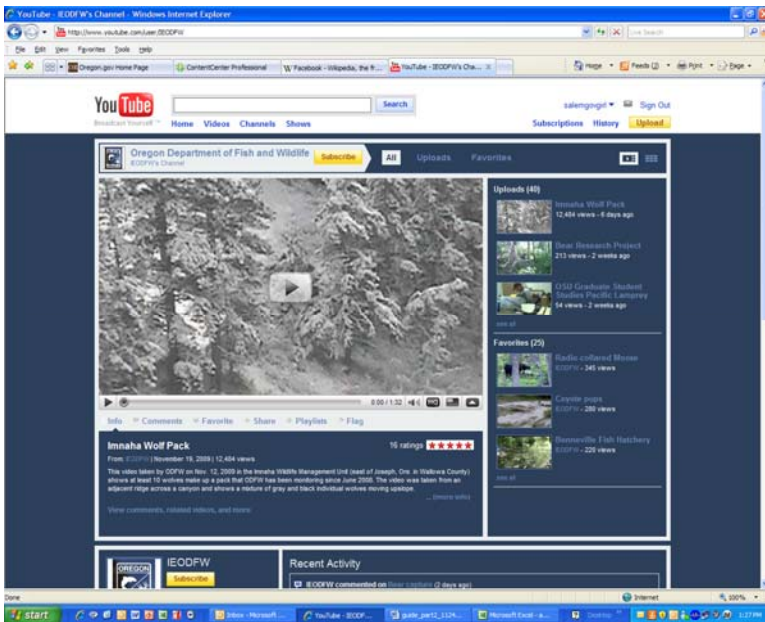
- **Quicklists:** These enable you to make a list of videos to watch later in a viewing session.
- **Adding a blog to the account:** You can connect a channel directly to a specific blog. Once you've added a blog to a YouTube account, you can post videos to that blog directly from the playback view.

- **Rating:** If activated, users may rate a video on a scale of 1 to 5.
- **Subscribing to tags:** Tags appear as descriptive metadata for each video uploaded. Subscribing to tags lets you follow all YouTube activity surrounding a particular topic.
- **Customizing the homepage:** Many ways exist to modify the look of a channel homepage.
- **Annotations:** You can superimpose boxes and callouts onto a completed video, enabling you to provide more information and link to other YouTube content.
- **Subscribe to other Channels:** Subscribing to a channel alerts you when someone updates that channel.
- **“Friending” other Channels:** Becoming friends is an easy way to keep track of what your friends are uploading, rating, and designating as “favorites.” It’s also an easy way to share public or private videos.
- **“Favoriting” videos:** Designating an external video as a “favorite” enables a user to bring it into a channel.
- **Comment moderation:** This gives you the option of allowing comments and video responses.

A few Oregon state agencies use YouTube. Here are links to OLCC, ODFW and ODOT YouTube channels.



Oregon Liquor Control Commission
<http://www.youtube.com/user/OLCC2008>



Oregon Department of Fish and Wildlife
<http://www.youtube.com/user/IEODFW>



Oregon Department of Transportation
<http://www.youtube.com/OregonDOT>

Tips:

- Users find video content predominantly through the search function on YouTube. Therefore, internal organization of video content is not a key factor in how a specific video is located. Associating related videos, however, is a way to increase overall views.
- Dedicate sufficient resources to ensure creation of high-quality videos. Search engine optimization (SEO) depends upon the viewers' responses:

- Number of views
 - Number and location of incoming links
 - Number of comments (if activated)
 - Number of channel subscribers
 - Viewers' ratings of the video (1 through 5 scale)
 - Others
- YouTube SEO relies upon the metadata attributed to each video. Though the user enters this data when uploading each video, the data can be changed at anytime:
 - Title of the video
 - Description of the video
 - Tags assigned to the video
 - YouTube's video playback technology requires users to download and install the Adobe Flash Player browser plug-in.
 - Standard account holders may upload videos up to 10 minutes long, with a size limit of 2 GB.
 - YouTube accepts video uploaded in most container file-types, including .AVI, .MKV, .MOV, .MP4, DivX, .FLV, and .OGG. These include video codecs such as MPEG-4, MPEG, and .WMV. As of July 21, 2009, YouTube users can upload 3D videos.

Guidelines

Follow these guidelines in administering your agency's presence on YouTube:

- Do not post videos that could discredit your agency or call into question the judgment of its workers.
- Be cautious of how the public might interpret a video. If you feel any misgivings at all, do not post the video.
- Do not cross the line between funny and distasteful. Remember: humor is not a universal value. Something you think is funny may be highly offensive to someone else.

Make sure your video does not violate the rules of common sense and decency. Do not put your agency in a situation that may result in account termination. Remember that these rules apply to all videos you upload to YouTube.

Facebook (www.facebook.com)

What is it?

Facebook is a global, privately-owned social networking Web site. Users may add friends and send messages. They may also update their personal profiles to notify friends about themselves, their companies or their agencies. Users can join networks organized by city, workplace, school, region and other criteria.

In 2011, Facebook agreed, in negotiations with the National Association for Attorneys General (NAAG) and the National Association of State Chief Information Officers (NASCIO), to [modify its terms of service](#) so state and

local governments can more easily utilize the popular social networking site. Facebook has modified the provisions of its terms and conditions to:

- Strike the indemnity clause except to the extent indemnity is allowed by a state’s constitution or law.
- Strike the language requiring that legal disputes be venued in California courts and adjudicated under California law.
- Require that a public agency include language directing consumers to its official Web site prominently on any Facebook page; and
- Encourage amicable resolution between public entities and Facebook over any disputes.

Oregon DOJ’s opinion is that Oregon can reasonably accept the Facebook revised Terms of Service.

What can I do with it?

As with many other social media tools, you begin by signing on and creating your profile. You can list a number of facts about yourself (or your agency) and post a picture. You can list your agency’s Web site & blog.

Once you are on, you can search for friends and ask people to be your friend on Facebook. When you send that invitation, the recipient may accept, deny or ignore it. Those who accept will appear on your friends list. You can also search out causes you support. If someone has a “cause page” on Facebook, you can link to it, and the page will display on your profile. You can send invitations to others to join the cause. You can link to another organization’s page as a fan, and it will display on your page. You can invite others to link as fans as well. On all the pages, you can post comments or links. You can post a note on a friend’s page (writing on his “wall,” which makes it visible to any friend), or you can send direct notes back and forth, one to one. A status bar displays your current comment or activity. People can link to videos or articles.

Tips:

- Consider the following factors before starting your Facebook account:
 - How many Facebook pages should your agency open?
 - How often will the page(s) be updated?
 - Facebook users share personal information (profiles, pictures, etc.) with each other. What does this mean to your agency?
 - Permanency of pages (deleted pages never really go away).
- Maintain a look of professionalism on Facebook, even though the site provides a casual atmosphere. Feel free to use a casual candid shot for your picture, instead of the professional portrait.
- Put all your links on Facebook: Web site, e-mail, LinkedIn, blog address, etc. People do look at profiles and do explore on Facebook.
- Monitor your Facebook friends. You will often receive requests to become friends from people you don’t know. Check them out before becoming friends, and remember that they do show up on your list.
- You can post pictures on your Facebook pages and others can view them. You do have a risk here; people can post pictures of you and label them, although you can remove the label.
- Do check your pages periodically and update your status. When you do, everyone on your friends list gets a notice at their page as to what you’ve done—posted a new status, changed your picture, posted an article, etc. Keep track of your friends’ postings and changes.
- Explore causes and organizations and invite friends to join them.
- Facebook gives you the opportunity to find lost friends, maintain contact, and receive updates.
- Guidelines: <http://www.facebook.com/home.php#/terms.php?ref=pf>

Twitter (www.twitter.com)

What is it?

Twitter is a free social networking and micro-blogging service that enables its users to send and read messages known as *tweets*. Tweets are text-based posts of up to 140 characters displayed on the author's profile page and delivered to the author's subscribers (*followers*). Senders can restrict delivery to those in their circle of friends, or by default, allow open access. Users can send and receive tweets via the Twitter Web site, Short Message Service (SMS) or external applications. While the service itself costs nothing to use, accessing through SMS may incur phone service provider fees.

What can I do with it?

For business purposes, think of Twitter as a blog. Post often, use it to educate, send alerts, etc. but know that your account will need constant maintenance.

You can link Twitter to your blog, Web site and your LinkedIn and Facebook accounts. Doing so will drive traffic from one to the other, increasing your internet visibility.

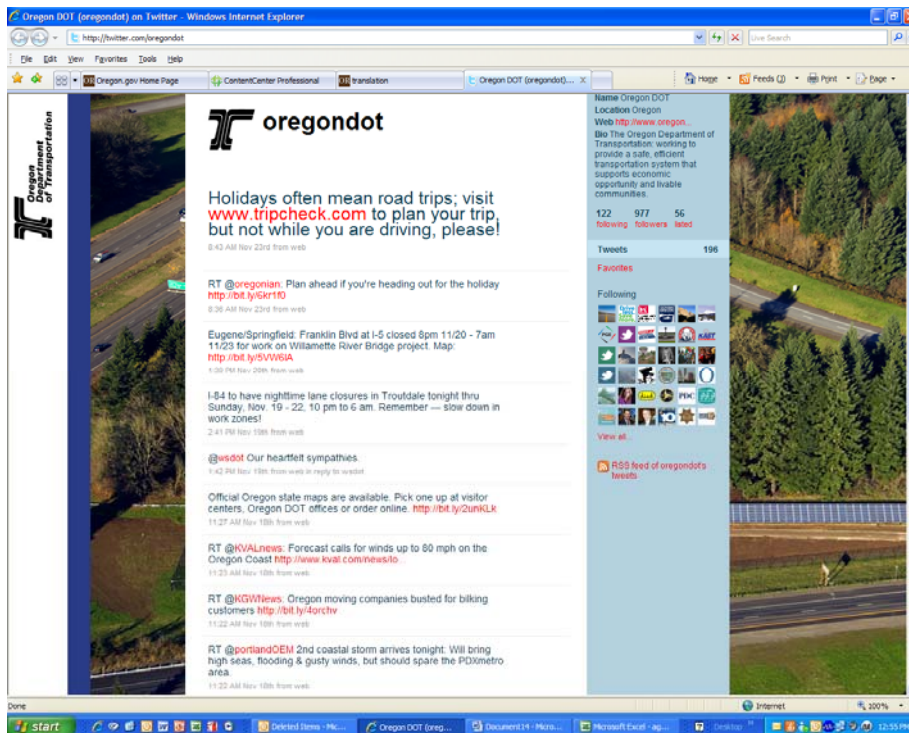
If you start with Twitter and post interesting tweets, others will start to follow you. You can, and should, follow others, as well. If you are working on a subject and need information, you can tweet about it and someone may quickly provide the answers you need. You can tweet about an interesting matter you are working on and others can respond.

Notable usage includes use in campaigning, use in legal proceedings, use in education, use in emergencies, use in protest and politics, use in public relations, and use to survey opinion.

Tips:

- Before setting up your Twitter account, consider the following factors:
 - How many twitter accounts does your agency need? Should you establish a single agency account, an account for each division, or accounts for specific employees? The answers depend on your communications objectives and the tactics you use to reach those objectives.
 - How often should you “tweet”? Again, the answer depends on your objectives and tactics.
 - Permanency of posts: You can delete a tweet if you make a mistake typing it in, but if someone picks it up before you delete it, it's out there.
- Tweet often. Maintain your account on a regular basis.
- Twitter is not for occasional use. For example, we would not use Twitter to announce building closures that occur maybe once or twice a year.
- Use Twitter to educate your followers.
- Make it a two-way conversation where possible -- like a blog.

ODOT uses Twitter to educate its “followers,” to link to items of interest, to send alerts about construction projects, lane closures, and upcoming storms.



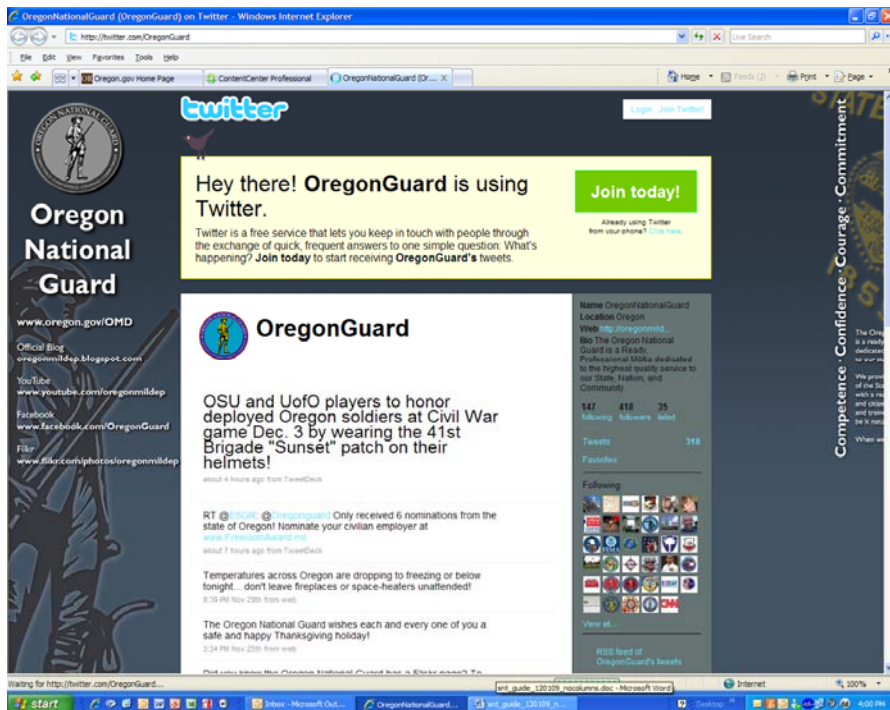
<http://twitter.com/oregondot>

Oregon Emergency Management uses Twitter to educate its followers, send out urgent weather updates and link to articles of interest.



<http://twitter.com/Baileyjn>

The Oregon National Guard uses Twitter to link to articles of interest, videos, the department blog and Web site. The Guard also uses the site to educate its followers and pass along tidbits of news items.



<http://twitter.com/OregonGuard>

Flickr, Picasa

What is it?

Two popular social photo sharing Web sites, Flickr and Picasa, allow users to post pictures that are generally visible and available to everyone else. Anybody can view and download these photos. It is important to abide by the community guidelines and be cautious of what you upload. Guidelines are available at:

Flickr: <http://www.flickr.com/guidelines.gne>

Flickr is an image and video hosting Web site, Web services, suite, and online community platform. A popular Web site for users to share personal photographs, the service receives wide use by bloggers as a photo repository.

Picasa: <http://www.picasa.google.com>

Picasa is a software application for organizing and editing digital photos. “Picasa” is a blend of the name of Spanish painter Pablo Picasso, and the phrase *mi casa* for “my house,” and “pic” for pictures (personalized art).

What can I do with it?

Flickr: Flickr offers two types of accounts: Free and Pro. Free account users may upload 100 MB of images a month and two videos. For the free user, only the most recent 200 photos will be visible in the “photostream.” The other photos are still stored on the site and links to these images in blog posts remain active. Free users can

also contribute to a maximum of 10 photo pools. Flickr deletes any free account that stays inactive for 90 consecutive days.

Flickr's Pro accounts allow users to upload an unlimited number of images and videos every month. A Pro user receives unlimited bandwidth and storage, and may place photos in up to 60 group pools. Pro users also receive ad-free browsing and access to account statistics.

Flickr asks photo submitters to organize images using tags (a form of metadata), enabling searchers to find images related to particular topics, such as place names or subject matter. Flickr was an early implementer of tag clouds, which provide access to images tagged with the most popular keywords. Flickr lets the user organize photos into "sets," or groups of photos that fall under the same heading. Sets are more flexible than the traditional folder-based method of organizing files, as one photo may belong to one set, many sets, or none at all. The user may group sets into "collections."

Flickr also offers a fairly comprehensive Web-service API that lets programmers create applications.

Flickr provides both private and public image storage. Users can set privacy controls that determine who can view the image. A "guest pass" allows private photos to be shared with non-Flickr members. Many members let anyone view their photos, and form a large collaborative database of categorized photos. Other members can leave comments about any image they have permission to view, and in many cases, can add to the list of tags associated with an image.

Picasa: Picasa provides file-importing and tracking features for organizing photos, as well as tags, facial recognition, and collections for further sorting. The service also offers several basic photo-editing functions, including color enhancement, red-eye reduction and cropping. Other features include slide shows, printing and image timelines. Images can be prepared for external use, such as for e-mailing or printing, by reducing file size and setting up page layouts. Users may also take advantage of integration with online photo printing services.

Picasa offers a search bar that is always visible when viewing the library. Searches are "live," in that displayed items are filtered as you type. The search bar will search filenames, captions, tags, folder names, and other metadata. You can even search for images that contain certain colors. Picasa uses technology to search for features within photos, such as people or buildings.

Picasa has no separate view window. The service provides only an "edit view" with a viewing area. Full-screen view is available in slideshow mode.

Picasa Web Albums (PWA) is a photo-sharing Web site from Google, often compared to Flickr and similar sites. It allows users with accounts at Google to store and share 1 GB of photos free of charge. In both paid and free accounts, the actual resolution of the photo is maintained (even though a smaller resolution photo may be displayed by the Web interface), and the *original* photo can be downloaded.

Tips:

- Keep your Flickr account active. Flickr will delete it after 90 consecutive days of inactivity.
- To view a full-screen image in Picasa, hold down the ctrl+alt keys while in "edit view," or press the Alt Gr key.
- Mac users take note. On January 5, 2009, Google released a beta version of Picasa for Mac (Intel-based Macs only). Also, a plugin is available for iPhoto to upload to the Picasa Web Albums hosting service. There is also a stand-alone Picasa Web Albums uploading tool for OS X 10.4 or later.

Other Popular Social Media Web Sites

Below are common online commercial sites:

Blip.TV

A hosting, distribution and advertising platform for creators of Web shows.

Delicious

A social bookmarking service that allows users to tag, save, manage and share Web pages from a centralized source. Users post links to stories or other media, write a brief description, and include tags that help when somebody searches for a topic.

Digg

A social bookmarking Web site that allows people to share and view content from all over the Web. All material is user submitted, and then is voted upon by visitors. The more Diggs (votes) a story receives, the higher up it goes, ultimately heading to the front page for maximum coverage. Viewers can also bury a story.

Feedburner

An RSS feed Web site that indexes blogs and tweets for RSS into a list form for ease of searching and scanning.

Linked-In

A business-oriented social networking site mainly used for professional networking.

Protopage

A free service that allows users to create a “homepage” to store notes, hyperlinks, and even custom software gadgets. In addition, protopage allows users to create and keep a “public page” and a “private page” (unlimited number of each).

Techrigy

A statistical data collector used to determine the number and type of people who visit a blog or twitter.

Vimeo

A video-centric social network site that supports embedding, sharing, video storage and allows user-commenting on each video.

Section 508 Compliance (Accessibility)

The state designed Oregon.gov to give users an easier way to find what they need from state government. The look users see today is a result of continuous efforts to improve Oregon.gov. One of those improvements is full compliance with the Americans with Disabilities Act (ADA).

Section 508 of the Rehabilitation Act of 1973, (as amended), is the federal standard for making electronic and information technology accessible to people with disabilities.

To view an excerpt from the Section 508 Web site, click here: <http://oregon.gov/DAS/accessibility.shtml>.

To view the Federal 508 Web site, click here:

<http://www.section508.gov/index.cfm?FuseAction=Content&ID=3>.

Measurement and Evaluation

Measurement and evaluation are an essential feature of any communication strategy or tactic. Counting is easy, but measuring the success of a communication effort is more challenging. Effective measurement drives evaluation and resources. Establish realistic expectations. Acknowledge that it takes time to establish a social media presence. Don't tie the continuation of usage to arbitrary audience metrics.

Resources on measurement include Icerocket, Technorati, Google Analytics, Blogpulse, and CustomScoop.

The following actions can help you conduct an effective and revealing effort to measure and evaluate your use of social networking media:

- Perform a communication audit across all products to understand the perception of the information consumer and identify inconsistencies.
- Define measurement benchmarks through detailed and achievable qualitative and quantitative metrics.
- Communicate the economic impact to leadership.
- Study the success of past measurement programs.

Determine the effect you wish to achieve with your blog, Twitter, or other social medium. Find ways to track the effects of your effort on target markets, advocacy organizations and stakeholders, then follow up to address any deficiencies or unintended results. Let the success of the plan and measurement shape future engagements, planning and budgeting. Simple analytics like counting hits, viewers and positive and negative comments are easy ways to show how new media can help define your "story" and will help your leadership see the value of what you are communicating.

Search for answers to these questions:

- How much coverage did your social networking generate?
- Did the right target markets get the message?
- Did third-party spokespeople carry those messages to other venues?
- How many bloggers quoted your article, or how many tweets came back? Were they useful? How many visitors read your blog?
- Learn more about measurement at:
<http://www.thenewpr.com/wiki/pmwiki.php/Main/HomePage?pagename=PRMeasurement.HomePage>.

Defining the return on investment in your social networking effort

Technology and market research analysts, Forrester Research, recently published some basic guidelines agencies can use to measure a blog’s return on investment. You can adapt these guidelines to evaluate your other social networking programs, as well.

Goal	Possible Measure
■ Address stakeholder needs and interests	Number of posts/month; survey of posters
■ Attract untapped audience	Survey of posters
■ Increase media attention	Page hits, etc.; survey of media
■ Increase Web site traffic	Page hits, etc.

	Benefit	Metric	Value
Increased brand visibility	Blog traffic	Number of unique visitors, page views	Cost of advertising in similar content channel
	Press mentions	Number of blog-driven stories by offline press, Web media, or high-profile bloggers	Cost of advertising in same publication
	Search engine positioning	Percentage of search results landing in the first three search pages driven by blog	Cost of search engine optimization to improve ranking
			Cost of paid search for blog-driven keywords
	Word of mouth	Number of blog posts in a Technorati search	Cost of hiring a buzz agent
		Number of people commenting on blog	
	Savings on customer insight	Number of times a year that blog comments provide useful business insight	Cost of a focus group or other market research tactic
	Reduced impact from negative user-generated content (UGC)	Number of press stories that mention UGC	Historical change in sales associated with change in Net Promoter-type metric
Change in Net Promoter Score or other attitude metric post-UGC			
Increased sales efficiency	Number of clients/prospects who read the blog, number of salespeople who read blog	Decrease in the cost of sales	

From “Calculating The ROI Of Blogging,” Forrester Research, Inc.

Terms of Service Agreements

The National Association of State Chief Information Officers (NASCIO) is working on a model agreement with various social networking media firms to protect the interests of states that use those media.

As of January 2010, NASCIO has created a Social Networking workgroup to negotiate the Terms of Service amendments for both FaceBook and YouTube as their first effort. They are using the agreements negotiated by the Federal government as a basis for agreements with the states.

A list of federal Terms of Service amendments for social networking is available at https://forum.webcontent.gov/Default.asp?page=TOS_agreements.

The NASCIO workgroup is also working collaboratively on a “NASCIO Best Practices Guide to Social Networking.” The goal of the workgroup is to work quickly and produce outcomes over the next few months. We will update this document as the work is completed.

Go to the Facebook section of this document ([page 22](#)) for more information about Facebook Terms of Service.

Privacy, Security and Risk

The use of social media must meet your agency's current policies for Internet use. Require your employees to learn and follow the agency's policies on acceptable use of state information assets.

Statewide Security Policy Information

- Enterprise Security Policies (<http://oregon.gov/DAS/EISPD/ESO/Policies.shtml>)
- Acceptable Use of State Information Assets (<http://oregon.gov/DAS/OP/docs/policy/state/107-004-110.pdf>)
- Employee Security (<http://oregon.gov/DAS/OP/docs/policy/state/107-004-053.pdf>)
- Information Security (<http://oregon.gov/DAS/OP/docs/policy/state/107-004-052.pdf>)

The following security issues cause concern and require consideration prior to the launch of any social medium.

- Viruses and Malware
- Hijacking
- Unauthorized mobile access

Viruses and Malware

Threat or vulnerability

- Introduction of viruses and malware to the agency's or the state's network

Risks

- Data leakage
- Data theft
- Owned systems (zombies)
- System downtime
- Resources required to clean systems

Recommended mitigation techniques

- Install anti-virus and anti-malware software on all systems and update daily at minimum.
- Use content-filtering technology to restrict or limit access to social media sites.
- Where possible, install anti-virus, anti-malware and filtering software on mobile devices, such as smartphones.
- Establish or update agency policies and standards.
- Develop and conduct awareness training and campaigns to inform employees of the risks involved with using social media sites.

Hijacking

Threat or vulnerability

- Fraudulent or hijacked organization presence that exposes customers or the organization to inaccurate information

Risks

- Customer and employee backlash
- Adverse legal actions
- Exposure of customer information
- Damaged reputation
- Targeted “phishing” attacks on customers or employees

Recommended mitigation techniques

- Engage a brand protection firm that can scan the Internet and search out misuse of the enterprise brand.
- Give periodic informational updates to customers to maintain awareness of potential fraud.
- Establish clear guidelines on what information should be posted as part of the social media presence.
- Immediately contact third-party social media provider and notify them of the fraudulent account.

Unauthorized mobile access

Threat or vulnerability

- Employee’s unauthorized access to social media via agency-supplied mobile devices (smartphones, PDAs)

Risks

- Infection of mobile devices
- Data theft from mobile devices
- Circumvention of agency controls on social media access
- Data leakage

Recommended mitigation techniques

- Route enterprise smartphones through an agency network filter, if possible, to restrict or limit access to social media sites (only if the agency policy limits or restricts access to social media).
- Install appropriate controls (anti-virus, anti-malware software) and continuously update them on mobile devices.
- Establish or update agency policies and standards on the use of smartphones to access social media.
-
- Develop and conduct awareness training and campaigns to inform employees of the risks involved with using social media sites.

Privacy

Federal public Web sites must conduct privacy impact assessments if they collect personally identifiable information. They must also post a “Privacy Act Statement” that describes the agency’s legal authority for collecting personal data and how the data will be used. They must post privacy policies on each Web site in a standardized machine-readable format such as Platform for Privacy Preferences Project, or P3P.

Read DAS’ “Privacy and Terms and Conditions” information before registering on a social networking site.

Resource: <http://www.oregon.gov/DAS/EISPD/EGOV/termsconditions.shtml>

Although some social media Web sites are exempt from the prior requirements, the state 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 Department of Justice to ensure they are in compliance with all privacy protection requirements.

Security

Information is an asset that, like other important business assets, is essential to an organization. Agencies must secure and protect that asset. Sharing information through social media technologies adds risk that agencies must account for and mitigate.

The decision to use social media technology must align with the strategic risk management direction of the agency. If an agency decides to use social media technology, the most effective risk-mitigation takes the form of educating users and making them aware of essential security measures.

Information security policies and processes also help address risk. User guidelines should be part of agencies’ policies on human resources and acceptable use. In general, information with a classification level greater than one should not be placed on or made available via social networking sites.

Agencies must establish controls (e.g., Web content filters, firewalls, strong passwords, etc.) to prevent hacking of the social media technology. The consequences of hacking can be incredibly harmful, because hacking can lead to the leakage of sensitive information.

When deciding whether to use social media technology, agencies must consider the following:

- Business, legal, and regulatory requirements applicable to the agency
- Statewide Information Security Plan, Policies, and Standards. (Go to <http://oregon.gov/DAS/EISPD/ESO/index.shtml> for more information on these topics.)
- Contractual security and privacy obligations
- Technical security regarding accounts, the application, and data security
- No circumvention or violation of the enterprise or Agency acceptable use policies, without prior authorization
- Liability
- Technical threats (i.e., malware)
- Privacy threats (i.e., leakage of personally identifiable information)
- Authenticity, reliability and integrity of information
- Reputation
- Management of the account (password sharing is not a viable option)

The Risks

In recent times, major security issues have troubled the social networks. Security firms have found that up to one in 600 profile pages on social networking sites hosted some form of malware. This trend has continued over the past several years, according to Kaspersky Lab Global Research. Last year, sites such as Facebook and Twitter became hotbeds of malware and spam. A worm recently spread on Twitter, infecting an unknown number of Twitter profiles. The worm propagated from one user profile to another by exploiting cross-site scripting vulnerabilities in unfiltered inputs on the Twitter profile pages.

Security concerns for these sites abound because many of the pages on Social Networking sites contain embedded scripts that can be compromised. Advertisements on these pages can infect PCs with un-patched systems simply by accessing a Web page with a compromised ad. Trojan horse programs could upload automatically without the warning prompt, causing immediate infection. Injected scripts can allow unsuspected, unguided session hijacking. Infected users are also vulnerable to phishing attacks.

DAS Risk Management received the following information from the Broker of Record, Willis HRH.

- The potential risks of social networking sites fall mainly into the area of cyber liability and arise from the ability of cyber criminals to access sensitive/personal data via the network. The main perils appear below:
 - Implantation or spread of a computer virus
 - Security breaches such as unauthorized access and unauthorized use
 - Content infringement (Web site copyright, trademark, domain names)
 - Cyber extortion
 - Breach of privacy / Identity Theft (electronic and non-electronic)
 - Denial of service outages
 - Destruction, modification, or disclosure of electronic data
 - Loss of business income due to a network security breach
 - Information theft
 - Fraud (including theft of customer funds or credit card/account numbers)
 - Theft of computer system resources
 - Covered acts caused by service providers
 - Negligent release of confidential information
 - Expenses associated with breach of security notification requirements

The article, *“Despite popular opinion, the blogosphere isn’t the Wild West,”* (See “Addendum: Articles” at the end of this document) describes why public companies need to develop policies to govern employees’ use of social networking sites and blogs, in order to avoid violating certain SEC regulations regarding fair disclosure.

■ Links to two other articles are listed below:

- This link provides background on how federal agencies and the US Department of Defense address social media. (<http://mashable.com/2008/08/07/theory-of-social-government/>)
- This link provides a sample acceptable use policy. Scroll down on the page to link to the policy. (<http://zdnetasia.com/techguide/security/0,39044901,62051415,00.htm>)

- Risk management strategies must include education and training. Assign curriculae designed to educate government employees and citizens about concerns inherent in using new technologies in a government context.
- This article, “Network Security and Privacy” by Oregon’s Broker of Record, Willis HRH, covers security and privacy issues to consider before getting involved in social media.
(http://oregon.gov/DAS/docs/state_of_or_cyber_risk.pdf)

Glossary

The following terms have special meanings in the context of using and operating a Web 2.0 application:

Advocacy: Creating a movement of “net-fluencers” to influence conversation, actions or motives in support of one’s objective.

Aggregation: Gathering and remixing content from blogs and other Web sites that provide RSS feeds; typically displayed in an aggregator like Bloglines or Google Reader, or directly on your desktop using software (often also called a newsreader). Beneficial for breaking news. CNN has effective tools like these. Digg and Reddit are examples of aggregator sites.

Example: Smithsonian 2.0 Blog (<http://smithsonian20.typepad.com/blog>)

Example: AIDS.gov Blog (<http://blog.aids.gov>)

Alerts: Search engines, like Google, allow you to specify words, phrases or tags that you want checked periodically, with results of those searches returned to you by e-mail.

Archive: Collections of earlier items usually organized by week or month. You may still be able to comment on archived items.

Audio Video Interleaved (AVI): A Microsoft Corporation multimedia video format. It uses waveform audio and digital video frames (bitmaps) to compress animation.

Authenticity: The sense that something or someone is “real.” Blogs enable people to publish content, and engage in conversations, that show their interests and values, and so help them develop an authentic voice online. Agencies should always be transparent and authentic while online.

Avatar: A graphical image that represents a person within the new media arena. You can build a visual character with the body, clothes, behaviors, gender and name of your choice. This may or may not be an authentic representation. View Secondlife.com for more information. (<http://secondlife.com>)

Back channel communications: Private e-mails or other messages sent by the facilitator or between individuals during public conferencing. They have a significant effect on the way that public conversations go.

Badges and buttons: Graphics embedded into a Web page (similar to a widget, and sometimes called one); they link to online content elsewhere, and typically serve as content syndication tools, to lead someone to content on another site.

Example: CDC H1N1 Buttons (<http://www.cdc.gov/#buttons>)

Bandwidth: The capacity of an electronic line, such as a communications network or computer channel, to transmit bits per second (bps).

Blog: Web sites with dated items of content in reverse chronological order, self-published by bloggers. Items (posts) may have keyword tags associated with them; they are usually available as feeds and often allow commenting. Blogs may be moderated by the host or may allow any material to be posted. Webcontent.gov provides advice on blogs. (<http://www.usa.gov/webcontent/technology/blogs.shtml>)

Blogosphere: The totality of blogs on the Internet, and the conversations taking place within that sphere.

Blogroll: A list of sites displayed in the sidebar of a blog, showing what the blogger reads regularly.

Bookmarking: A Web-based service that lets users create and store links; saving the address of a Web site or item of content, either in your browser, or on a social bookmarking site like Delicious. If you add tags, others can easily find your research, too, and the social bookmarking site becomes an enormous public library.

Example: Holdrege Area Public Library, NE (http://www.holdregepubliclibrary.org/delicious_links.html)

Bulletin boards: The early vehicles for online collaboration, where users connected with a central computer can post and read e-mail-like messages.

Categories: Pre-specified ways to organize content. Example: a set of keywords that you can use but not add to when posting on a site.

Champion: An enthusiast or group of enthusiasts who can get conversations started by posting messages, responding to others or helping them.

Chat: A Web site interaction among a number of people who add text items one after the other into the same space at (almost) the same time. A place for chat, a chatroom, differs from a forum because conversations happen in “real time,” similar to face-to-face.

Cloud computing: The use of applications hosted across the Internet by an independent service provider. An example of cloud computing is a Google Doc, in which the word processing program is accessible through a Web browser, and the content in the document resides in Google’s servers.

Community, online: A group of people who communicate mainly through the Internet.

Community building: The process of recruiting potential community or network participants to help them find shared interests and goals, use the technology and develop useful conversations.

Conference, online: The conversations of people involved in a Web forum, often organized around topics, threads, and themes.

Constructives: The science of applying new media viral mapping to a specific public affairs issue to determine a projected outcome; educating readers on projected paths.

Content management systems: Software suites that offer the ability to create static Web pages, document stores, blogs, wikis and other tools.

Conversation: The currency of social networking; an exchange of information through blogging, commenting or contributing to forums.

Cookie: Information (in this case URLs, Web addresses) created by a Web server and stored on a user’s computer. This information lets Web sites keep a history of a user’s browsing patterns and preferences. People can set up their browsers to accept or not accept cookies.

Copyright: A form of intellectual property that gives the author of an original work exclusive rights for a certain time period in relation to that work, including its publication, distribution and adaptation.

Crowdsourcing: The collective skills and enthusiasm of those outside an organization who can volunteer their time to contribute content and solve problems.

Creative Commons: A not-for-profit organization and licensing system that offers creators the ability to fine-tune their copyright, spelling out the ways in which others may use their works. For more information, visit: <http://creativecommons.org/>.

Cyberculture: A collection of cultures and cultural products that exist on and/or made possible by the Internet, along with the stories told about these cultures and cultural products.

Digital story: A short personal nonfiction narrative composed on a computer, often for publishing online or publishing to a DVD, told from the narrator's point of view. See Center for Digital Storytelling (<http://www.storycenter.org/>) and Creative Narrations (<http://www.creativenarrations.net/>).

Domain name: A method of identifying computer addresses. Your e-mail address has a domain address. If there is a ".edu" at the end of your e-mail address that means your account is affiliated with an educational institution. A ".com" extension means the account is business related and a government account has a ".gov" suffix.

E-mail lists: Important networking tools offering the ability to "starburst" a message from a central postbox to any number of subscribers, and for them to respond.

Embedding: The act of inserting video or photos to a Web site or e-mail.

Facilitator: Someone who helps people in an online group or forum manage their conversations.

Feed: The means by which you can read, view or listen to items from blogs and other RSS-enabled sites without visiting the site, by subscribing and using an aggregator or newsreader.

Flash: Animation software used to develop interactive graphics for Web sites as well as desktop presentations and games.

Forum: A discussion area on Web sites where people can post messages or comment on existing messages asynchronously (that is, independently of time or place).

Friends: Contacts whose profile you link to in your profile, thereby creating your network. On some sites, people have to accept the link; in others, they don't.

Groups: Collections of individuals with some sense of unity through their activities, interests or values. They are bounded: you are in a group, or you're not. They differ from networks, which are dispersed, and defined by nodes and connections.

Hyperlink: Text, images, or graphics that, when clicked with a mouse (or activated by keystrokes), will connect the user to a new Web site. The link is usually obvious, such as underlined text or a "button" of some type, but not always.

Instant messaging (IM): Chatting with one other person using an IM tool like AOL Instant Messenger, Microsoft Live Messenger or Yahoo Messenger. The tools let a user show availability for a chat. Instant messaging can be a good alternative to e-mails for a rapid exchange. Problems arise when people in a group are using different IM tools that don't connect.

Listening: Setting up searches that monitor blogs to determine when an organization receives a mention or reference; also, the art of skimming feeds to the blogosphere to find out what topics bubble up.

Listserv: A list of e-mail addresses of people with common interests. Software enables people who belong to a list to send messages to the group without typing a series of addresses into the message header.

Lurker: A person who reads but does not contribute or add comments to forums. The “one-percent rule-of-thumb” says that one percent of people contribute new content to an online community, another nine percent comment, and the rest lurk.

Malware: Malicious software designed to infiltrate a computer without the owner’s informed consent. The expression covers a variety of forms of hostile, intrusive, or annoying software or program code. The term “computer virus” is sometimes used as a catchall phrase to include all types of malware, including true viruses. Wikipedia on Malware (<http://en.wikipedia.org/wiki/Malware>)

Mashups: Mixes of technology, audio, video and maps that combine several tools to create a new Web service. For example, a mashup would be a Google map showing average housing prices drawn from a city assessor’s online database. See <http://www.popfly.com/> for free development.

Example: Johnson County, Kansas’ Crime Map Mashup (<http://www.jocosheriff.org/cmap/>)

Example: TweetCongress (<http://tweetcongress.org>)

Micro-blog: Extremely short blog posts in the vein of text-messaging. The messages are available to anyone or to a restricted group that the user chooses. Twitter, a popular micro-blog client, allows for posts of up to 140 characters, uploaded and read online or through instant messaging or mobile devices via text-messaging.

Networks: Structures defined by nodes and the connections between them. In social networks, the nodes are people, and the connections are the relationships that they have. Networking is the process by which you develop and strengthen those relationships.

Newsgroup: An Internet “site” centered on a specific topic or course. Some newsreader software can “thread” discussion so there can be various topics centered on a central theme.

Newsreader: Web site or desktop tool that acts as an aggregator, gathering content from blogs and similar sites using RSS feeds so you can read the content in one place, instead of having to visit different sites.

Open-source software: Software available under a license that permits users to study, change and improve the software, and to redistribute it in modified or unmodified form.

Peer-to-peer: Direct interaction between two people in a network. In that network, each peer connects to other peers, opening the opportunity for further sharing and learning.

Permalink: The address (URL) of an item of content. Example: a blog post, rather than the address of a Web page with lots of different items. You will often find it at the end of a blog post.

Phishing: The criminally fraudulent process of attempting to acquire sensitive information such as usernames, passwords and credit card details by masquerading as a trustworthy entity in an electronic communication. Communications purporting to be from popular social Web sites commonly try to lure the unsuspecting public. Phishing typically occurs by e-mail or instant-messaging. It often directs users to enter details at a fake Web site whose look and feel are almost identical to the legitimate one. Even when using server authentication, it may require tremendous skill to detect that the Web site is fake.

Wikipedia on Phishing (<http://en.wikipedia.org/wiki/Phishing>)

Photo-sharing: Uploading images to a Web site like Flickr, Picasa, SmugMug, BubbleShare and Photobucket, adding tags and offering people the opportunity to comment or even re-use your photos if you add an appropriate copyright license.

Example: Library of Congress Flickr Project (http://www.flickr.com/photos/library_of_congress)

Podcast: A series of digital media files (either audio or video) that are released episodically and downloaded through web syndication. The mode of delivery differentiates podcasts from other ways of accessing media files over the Internet, such as simple download or streamed webcasts. Special client software applications known as *podcatchers* (e.g., iTunes, Zune, Juice, and Winamp) are used to automatically identify and download new files in a series when they are released, by accessing a centrally-maintained web feed that lists all files associated with the series. New files are thus downloaded automatically and stored locally on the user's computer or other device for offline use, giving simpler access to episodic content.

List of government podcasts (http://www.usa.gov/Topics/Referency_shelf/Libraries/Podcasts.shtml)

CDC advice on podcasts (<http://www.2c.cdc.gov/podcasts/BestPractices.htm>)

Post: Item on a blog or forum.

Presence online: Availability for contact by instant-messaging, voice-over IP, or other synchronous methods of communication; also, the degree to which an individual's name shows up in an online search.

Profiles: Information that users provide about themselves when signing up for a social networking site. As well as a picture and basic information, such information may include personal and business interests, a "blurb" and tags to help people search for like-minded people.

Remixing: The process of taking separate items of content, identified by tags and published through feeds, and combining them in different ways.

RSS: "Really Simple Syndication," which allows subscribers to receive content from blogs and other social media sites, delivered through a feed.

RSS Feed Specifications (<http://www.rss-specifications.com/rss-feed-etiquette.htm>)

Shockwave: A three-dimensional (3D) animation technology format.

Sharing: The process of offering other people the use of text, images, video, bookmarks or other content by adding tags, and applying copyright licenses that encourage use of content.

Smartmob: A gathering of users for an activity or event as a result of an online connection or network.

Social networking sites (SNS): Online communities where users can create profiles and socialize with others, using a range of social media tools including blogs, video, images, tags, lists of friends, forums and messages.

Webcontent.gov provides advice on SNS. (http://www.usa.gov/webcontent/technology/other_tech.shtml)

Streaming media: Video or audio intended to be listened to online but not stored permanently.

Tag: A keyword added to a blog post, photo or video to help users find related topics or media.

Threads: Strands of conversation.

Tiny URL: A Web service that provides short aliases for redirection of long URLs.

Wikipedia on Tiny URLs (http://en.wikipedia.org/wiki/Tiny_url)

To create a Tiny URL (<http://www.tiny.cc>)

To shorten Government (.gov, state.or.us, .mil, .fed.us, .si.edu) URLs

(http://oregon.gov/DAS/EISPD/EGOV/BOARD/docs/trusted_government_url_shortening.pdf)

Trackback: A facility for other bloggers to leave a calling card automatically, instead of commenting. "Blogger A" may write on "Blog A" about an item on "Blogger B's" site, and through the trackback facility leave a link on B's site back to A. The collection of comments and trackbacks on a site facilitates conversations.

Transparency: The ability to enhance searching, sharing, self-publishing and commenting across networks to find out what's going on in any situation where online activity occurs.

Troll: A hurtful, but possibly valuable person who, for whatever reason, is both obsessed by and offended by everything you write on a blog.

URL: Unique Resource Locator is the technical term for a Web address like <http://www.oregon.gov>.

Video sharing: The process of sharing videos and making them available for others to view and comment on. Video sharing sites let viewers “embed,” or display others’ video on their own sites. Examples include YouTube, Blip.tv and Vimeo.

Example: HHS YouTube Channel (<http://www.youtube.com/user/USGOVHHS>)

Virtual worlds: Online places like Second Life, where you can create a representation of yourself (an avatar) and socialize with other residents. Basic activity is free, but you can buy currency (using real money) in order to purchase “land” and trade with other residents. Some organizations use Second Life to run discussions, virtual events and fundraising.

Example: CDC in Whyville and Second Life (<http://www.cdc.gov/HealthMarketing/ehm/virtual.html>)

Web 2.0: A term coined by O’Reilly Media in 2004 to describe blogs, wikis, social networking sites and other Internet-based services that emphasize collaboration and sharing, rather than less interactive publishing (Web 1.0). It is associated with the idea of the Internet as platform.

Widget: “Window gadget,” a stand-alone application that can be embedded in other applications, like a Web site or a desktop, or viewed on a PDA. A widget may help accomplish missions like subscribing to a feed, doing a specialist search or even making a donation. For example, a widget might link to a display of the latest news and weather, a map program, or photos.

Example: CDC widget for H1N1 Flu (<http://www.cdc.gov/h1n1flu/>)

Whiteboard: The online equivalent of a write-on/wipe-off glossy surface; a tool that lets one write or sketch on a Web page.

Wiki: A Web page with an editing capability that lets users contribute to a body of information. The best-known example is Wikipedia, an encyclopedia created by thousands of contributors across the world. Once people have appropriate permissions (set by the owner), they can create pages and add to and alter existing pages. Webcontent.gov provides advice on wikis. (<http://www.user.gov/webcontent/technology/wiki.shtml>)

Worm: A self-replicating computer program that uses a network to send copies of itself to other nodes (computers on the network) without any intervention by the user. Unlike a virus, it does not need to attach itself to an existing program. Worms nearly always harm the network, if only by consuming bandwidth, whereas viruses corrupt or devour files on a targeted computer.

Wikipedia on worms (http://en.wikipedia.org/wiki/Computer_worm)

XML: “Extensible Markup Language,” which is a system for organizing and tagging elements of a document so that the document can be transmitted and interpreted between applications and organizations. Human readable XML tags define “what it is,” and HTML defines “how it looks.” XML allows designers to create their own tags.

Frequently Asked Questions

Q: When can social media sites be viewed at work?

A: Follow your agency's policies for viewing social media sites during business hours.

Q: Can employees create a Twitter or Facebook account for agency use?

A: Follow your agency's policies for creating Twitter or Facebook accounts.

Q: Who owns the content posted to social media?

A: Read Oregon's "Terms of Service" agreement for social media. For an update on this information, go to this document's section on "Terms of Service."

Q: What is social media?

A: The use of technology combined with social interacting to create or co-create value.

Q: Who created the Oregon Terms of Service agreement?

A: The National Association of State Chief Information Officers (NASCIO) is in the process of creating this document with input from the states. The Department of Justice will review and edit Oregon's document.

Resources

Policy Is Not Enough: Educate Employees About Social Media Use

http://www.oregon.gov/DAS/EISPD/EGOV/BOARD/docs/sm_policy_not_enough_educate.pdf

VBA - Social Networking - WIIFM? (What's in it for me?)

<http://www.vtbar.org/Upload%20Files/WebPages/CLE/midyearmeeting/2009mym/materials/7socialnetworking/1mcsocialnetworking.pdf>

Staying Informed and Involved Online

http://www.mass.gov/?pageID=gov3terminal&L=3&L0=Home&L1=Key+Priorities&L2=Civic+Engagement+%26+Strong+Communities&sid=Ago v3&b=terminalcontent&f=staying_informed_involved_online&csid=Agov3

U.S. Department of Health and Human Services: YouTube Guidance

<http://www.newmedia.hhs.gov/standards/youtube/>

U.S. Department of Health and Human Services: Twitter Guidance

<http://www.newmedia.hhs.gov/standards/twitter>

U.S. Department of Health and Human Services: Social Media 101 Overview: The What and the Why

<http://www.newmedia.hhs.gov/socialmedia101.html>

U.S. Department of Health and Human Services: Social Networks

<http://www.newmedia.hhs.gov/tools/socialnetworks.html>

RSS Specifications

<http://www.rss-specifications.com/rss-feed-etiquette.htm>

What are the risks associated with social networking sites?

http://www.portal.state.pa.us/portal/server.pt?open=512&objID=337&&level=1&menuLevel=Level_1&mode=2

Twitter suspends accounts of users with infected computers

http://www.pcworld.com/businesscenter/article/168201/twitter_suspends_accounts_of_users_with_infected_computers.html

Web 2.0 Security: Things to Know about the Social Web

<http://www.networkworld.com/news/2009/060509-web-20-security-things-to.html>

Addendum: Article

“Despite popular opinion, the blogosphere isn’t the Wild West”

Portland Business Journal / Nov. 2, 2009

Garry J. Schnell is an attorney at Davis Wright Tremaine LLP in Portland. Reach him at 503-778-5262.

Public companies must be cautious when developing a social media policy and must comply with SEC regulations.

While online social media provides many benefits, there are potential pitfalls to its use: federal securities law violations, disclosure of confidential information, and various tort claims such as invasion of privacy or defamation.

In addition to company sponsored blogs, employees may also use online social media to discuss a variety of information from product development to financial or personnel issues. In particular, one SEC regulation prohibits the selective disclosure of material information.

Last year, the SEC issued guidance that primarily addresses when information posted on a company Web site is “public,” and when a company becomes liable for information on Web sites. For the first time, the SEC recognized that companies can post information, and have that information be considered “disseminated” without having to place the same information on a newswire or in a public filing.

Is the information public?

Generally, Regulation FD, as it’s called, prohibits selective disclosure of material nonpublic information. It provides that information can be publicly disclosed by either a public filing or by disseminating the information through “another method (or combination of methods) of disclosure that is reasonably designed to provide broad, non-exclusionary distribution of the information to the public.”

The SEC’s new guidance set forth three considerations to help determine whether information posted on corporate Web sites is considered “public.”

- Whether a company’s Web site is a recognized channel of distribution.
- Whether information is accessible and disseminated in a manner calculated to reach investors.
- Whether information is posted for a reasonable period of time so that it has been absorbed by investors.

Antifraud issues?

The SEC’s guidance refers to the use of “Interactive Web Site Features,” which include blogs, electronic shareholder forums and other social media. The SEC advises companies to “consider taking steps to put into place controls and procedures to monitor statements made by or on behalf of the company on these types of electronic forums.”

One of the most important issues are statements made on blogs or other interactive Web sites that are subject to the antifraud provisions of the federal securities laws. Companies cannot require investors to waive protections under these laws as a condition to the use of such interactive Web sites.

Public companies should establish disclosure controls and procedures to monitor statements made by or on behalf of the company. The guidance clarifies that statements made on blogs or other online social media are subject to the antifraud provisions of the federal securities laws.

In addition, social [sic] media policies should include requirements for company blogs and electronic forums and other interactive tools to be linked to the company’s Web site.

The policy should also address what should not be discussed on employee blogs, Tweets or Facebook pages, including laws governing the dissemination of information for the public.

Contacts

For more information about this document, please contact the State Web Information Publisher at linda.morrell@state.or.us.

This document is available online at: http://www.oregon.gov/DAS/EISPD/EGOV/BOARD/social_networking_guide/index.shtml

The Employee Expectations Template for Social Networking Media is online at: http://www.oregon.gov/DAS/EISPD/EGOV/BOARD/docs/employee_expectations_081910.pdf

