Category: General Administration, Communications Management CDC-GA-2011-01 Issue Date: 09/14/2011, Updated 9/11/2013, 1/8/2015¹ Proponent: Office of the Chief Information Officer; Office of the Associate Director for Communication

CDC ENTERPRISE SOCIAL MEDIA POLICY

Sections: 1.	PURPOSE AND SCOPE
2.	BACKGROUND
3.	POLICY
4.	RESPONSIBILITIES
5.	REFERENCES
6.	ABBREVIATIONS AND ACRONYMS
7.	DEFINITIONS

Exhibits:

- A. SAMPLE OF OFFICIAL SOCIAL MEDIA CHANNELS
- B. GUIDELINES AND BEST PRACTICES

1. PURPOSE AND SCOPE

This policy governs the official use of social media at the Centers for Disease Control and Prevention (CDC)². In the last several years, the use of Facebook, YouTube, Twitter, and other social media tools to disseminate health messages has grown significantly, and continues to trend upward. CDC has found using social media tools as an effective way to expand reach, foster engagement, and increase access to credible, science-based health messages.

This policy is applicable to all organizations within the CDC as well as all CDC employees, contractors, fellows, and other non full-time employees employed by CDC. In the event of any conflict between this policy and any other CDC policy, directive, or regulation, this policy will govern and supersede any previous issuance or directive.

2. BACKGROUND

The CDC uses social media as a strategic communications tool. The benefits of social media include:

- Increasing the dissemination and potential impact of CDC's science
- Improving reach to diverse audiences
- Furthering the delivery of consistent, timely, repetitive, and tailored/targeted messages
- Facilitating engagement, participation, transparency, collaboration, and interactive communication
- Enhancing health communication efforts

Social media are online tools and services that encourage interaction and engagement among the individuals who use these tools. Social media services are participatory and include user-generated content. Types of user-generated content include posting content on the Internet, commenting on content that others have created or posted, and downloading and interacting with content that others have created. Social media can include, **but is not limited to**: web and mobile phone applications, blogs, photo and video sharing sites, micro-blogging and social

Note: This policy has been cleared for publication on CDC.gov. As a CDC operational policy, it contains references or links to the CDC intranet. These internal links will not work for users accessing this document outside of the CDC network.

¹ Clarification added regarding the use of disclaimers.

² References to CDC also apply to the Agency for Toxic Substances and Disease Registry (ATSDR).

networking sites, and wikis. For more information about strategic use of social media, please see: <u>Social Media Toolkit for Health Communicators</u>.

3. POLICY

A. Personal Use of Social Media

The same principles, guidelines, and standards of conduct that apply to CDC employees generally apply to employee participation in social media, both inside CDC on the intranet, and publicly on the internet. In particular, all leaders, managers, and employees must adhere to established CDC policies on <u>Use of CDC Information Technology Resources</u> and <u>Standards of Ethical Conduct for Employees of the Executive Branch</u> when participating in any work-related social media activities.

This policy creates no new standards for ethical conduct, and nothing in this policy should be construed to enlarge or diminish any preexisting rights of employees or otherwise affect terms of employment with CDC.

All participation in social media through the use of CDC resources must follow the security guidance contained in the HHS <u>Rules of Behavior</u> (CDC Implementation) and the standards from Office of the Chief Information Security Officer (OCISO). Additional CDC guidance for ensuring safe, secure use of social media is contained in CDC's <u>Social Media and Third Party</u> <u>Site Security Implementation Standards</u>, and other guidance and best practices documents created by the CDC through OCISO and the Division of Public Affairs (DPA), within the Office of the Associate Director for Communication (OADC).

Personal profiles in social media spaces will be set up using personal email addresses and will not include representations or depictions of the agency. Individuals will not post in online forums while identified as employees of CDC unless they are an official CDC spokesperson. (Please see <u>CDC Media Relations Policy</u>, 3.C.4 for more information on CDC spokespeople.) Embargoed content must never be posted.

Guidelines for Personal Employee Participation in Social Media

- Employee participation in social media may be governed by laws and regulations concerning employees' outside activities. If the activity is related to the employee's work or the mission of the agency, the employee should consult his or her supervisor or the CDC Office of the General Counsel (OGC) <u>Ethics Program</u> if the employee has any concern that the activity may fall under the purview of the Ethics Regulations or HHS Supplemental Ethics regulations. See <u>Quick Facts About Outside Activities</u>
- Employees are encouraged to carefully consider the content of their posts and comments in social media spaces, as most may be retained by the third-party vendor indefinitely. Employees may discuss their posts and comments with their supervisor for advice and guidance, if they choose. However, employees ultimately have sole responsibility for anything they post online. Employees who discuss influential scientific information and identify themselves by name online must make it clear that the opinions they express are their own and do not reflect the official position of CDC in any way on any topic

- When not acting as official CDC spokespersons, all CDC staff, including leaders, who choose to disclose their affiliation with CDC, HHS or the Federal Government shall ensure that they do not post material or statements that could give the impression that they are representing CDC, HHS or the Federal Government. If there is a chance that the materials or statements could be misconstrued as CDC or Federal Government business, the user shall post a disclaimer stating that the opinions expressed are those of the individual alone and do not reflect those of the CDC, HHS or Federal Government. For further information on disclaimers, see <u>CDC/ATSDR Operationalization of Office of</u> Management and Budget [OMB] Bulletin and HHS Draft Guidance on Disclaimers).
- A standard disclaimer does not exempt CDC leaders and managers from special responsibility when using social media tools. By virtue of their position, they must consider whether personal thoughts they publish may be misunderstood as expressing CDC policy
- This policy does not cover or limit employees' participation on social media sites and applications away from work, i.e., using a non-government-provided computer, and discussing a topic that is unrelated to the employee's job or professional activities

B. Official Use of Social Media

1) Official Postings to non-CDC sponsored Social Media Channels

When an employee posts content or comments online that represent CDC, that employee must identify himself or herself by name and title; and the content of all posts must be formally approved through the procedures established by the employee's center, institute, or office (C/I/O) to publicly release information to the public. This may also include approval by the center-level Associate Director for Communication Science (ADCS) in the Health Communication Science Office (HCSO), and/or the News Media branch, DPA, OADC for CDC's C/I/Os.

2) Official Postings to CDC-sponsored Social Media Channels

Individuals who maintain and monitor CDC social media profiles may access and contribute content in their official capacity in accordance with the security standards from OCISO and guidelines outlined in the <u>Social Media and Third Party Site Security</u> document, using the login information for the official profile and must not post official content using personal profiles.

The content of all posts must be formally approved through the procedures established by the employee's C/I/O before public release. This may also include approval by the ADCS in the HCSO, and the News Media branch, DPA, OADC for CDC's C/I/Os.

All content posted by CDC in CDC-sponsored social media channels and applications must be <u>Section 508 compliant</u> to the maximum extent possible. (See Section 3.B(4)(j) below for more guidance about 508 compliance.)

CDC staff and programs who wish to post content or provide comments in response to comments received on the official CDC channels will work with the administrators of the official social media channels to post and clear the content or respond to comments. Staff and C/I/Os will not respond using individual profiles.

3) Managing and Posting on official CDC Social Media Channels

CDC C/I/Os that participate in social media in an official capacity must commit time and resources to establish a profile or channel, handle comments from the public, maintain security standards, and ensure Section 508 compliance.

<u>Guidelines</u> that address the processes, best practices and technical specification for social media will be developed by the CDC Social Media Council and maintained by OADC. These guidance documents and processes should guide all official use of social media. They will be added to this policy as they are created and approved.

See the definition section to help distinguish between profiles, channels, and applications.

4) Specific Requirements for Creating and Managing Official Social Media Profiles, Channels, or Applications

a) Profile Creation and Disclaimers: All official profiles in social media channels must be branded with the CDC name and/or logo. All official profiles must include a disclaimer based on OMB policy and the negotiated Terms of Service stating:

"Posted comments and images do not necessarily represent the views of CDC. If you are looking for official CDC information, please go to: <u>www.cdc.gov</u>."

When applicable, all profiles must include this posted comment policy.

- b) Terms of Service: Prior to using a social media channel, staff must ensure that channel has a negotiated Terms of Service agreement in place with the General Services Administration (GSA) and HHS. OADC will be consulted to make a determination.
- c) Privacy Impact Assessment: Each new social media site or application must be included in the privacy impact assessment conducted by OCISO and DPA. Each new social media site or application must include a privacy statement and a posted link to CDC's privacy policy.
- clearance: Any use of a social media channel, creation of a new profile, or development of a social media application must first be cleared by a C/I/O's Associate Director for Communication Science (ADCS). C/I/Os without an ADCS must follow their formal clearance chain and consult with OADC. New social media profiles must also be reviewed by the CDC Social Media Council prior to launch.
 Some social media activities must also be approved by OADC. See the table provided below to determine which profiles may need approval.

All content posted in social media channels or applications must be cleared. The content should be cleared by procedures in place for the C/I/O who owns the profile and/or the content owner (see chart below). For more information about specific social media channels, please refer to the <u>Social Media Toolkit</u>.

Social Media A	pplication	Usage Approval

Social Media Channel	ADCS Approval	CDC Social Media Council Review	OADC Approval	OADC Notification
Blogs	Yes	Yes	No	Yes
Buttons and Badges	Yes	No	No	Yes
eCards	Yes	No	No	Yes
Facebook	Yes	Yes	No	Yes
Twitter	Yes	Yes	No	Yes
Mobile – Texting	Yes	No	No	Yes
Mobile – Applications	Yes	No	No	Yes
Widgets	Yes	No	No	Yes
YouTube – Posting Videos	Yes	No	No	Yes
New/Emerging Social Media Channels	Yes	Yes	Yes	Yes

- e) Registering Profiles: All profiles created on any social media channel must be reported to OADC and OCISO. OADC will maintain a directory of all official social media profiles. Please contact <u>SocialMedia@cdc.gov</u> to register your profile.
- f) Security: CDC social media channels and applications must be related to CDC's mission and operated under the umbrella of CDC's core values and the CDC pledge. All participation in social media must follow information security and privacy standards published by HHS and OCISO. All content owners will follow the guidelines in the <u>Social Media and Third Party Site Security</u> document. CDC information must be protected as required by the Privacy Act, policies on Controlled Unclassified, sensitive and health information, as well as other applicable requirements.
- g) Guidance and Best Practices: All participation in social media will follow the guidance, standards, and best practices documents created by OADC and the Social Media Council. These are available at: <u>http://www.cdc.gov/SocialMedia/Tools/guidelines/</u>.

- h) Content Monitoring and Moderation: Comments must be moderated and approved or removed based on a posted comment policy. All social media profiles require regular management; the frequency depends on the type of site and type of content. Frequency of maintenance should be posted as part of the comment policy.
- i) Records Management: A federal record is determined by its content and not by the medium in which it is created, received, and/or transmitted. Each C/I/O is responsible for determining which content contained within a social media application is a federal record and its retention, based on <u>CDC</u> and/or <u>General Records</u> <u>Schedules</u>. The maintenance of these records, either in print or electronic form, is the responsibility of the C/I/O originating the content. For assistance with social media and records management issues contact <u>MASO Records Management</u>.

C/I/Os must establish controls over their social media sites to ensure federal records are being captured and:

- Select a designate/designates who are responsible for official records created, received, and transmitted
- Ensure designate/designates monitor content to ensure that it is downloaded and stored in a way that prevents modification of records and allows access for required retention periods
- Ensure designate/designates have knowledge of where original records reside
- Ensure designate/designates, with the assistance of key stakeholders, determine how social media records will be downloaded from social media sites for temporary or permanent retention

The C/I/O will contact the CDC Records Officer, for assistance in determining records status and for additional management assistance.

- j) Section 508 Compliance: All content posted by CDC in social media channels and applications must be <u>Section 508 compliant</u> to the maximum extent possible. This includes, but is not limited to, captioning and audio description of videos, use of appropriate headings and color, and ensuring alternate text and a description in the caption for photos and other images. When compliance is limited by technical factors, an additional disclaimer regarding Section 508 compliance may be added to the page to refer people to compliant content on CDC.gov. Section 508 compliance of developed social media applications must be approved by the CDC Section 508 Coordinator.
- k) Contractors Creating and Managing Social Media Channels: Contractors must also comply with all elements of this policy. CDC should pay particular attention to ensure that creation of channels, profiles, or applications have been cleared by CDC, that security issues are addressed, that CDC staff can access the site, and all requirements are being actively addressed by the contractor. CDC must pay particular attention to ensure that contracted work has been approved prior to development, that the content posted has been cleared, and that the contractor is managing the profiles under the guidance of CDC.

4. **RESPONSIBILITIES**

A. CDC Chief Information Officer

• Provides technical and electronic resources for hosting, maintenance and administration of CDC social media channels and applications, both internally and externally

B. Office of the Chief Information Security Officer

• Provides expertise in security and privacy

C. Associate Director for Communication

- Approves all requests for creation of new social media profiles, channels or applications
- Ensures clearance of all posted content
- Ensures contractors comply with policy and standards for social media
- Reports new profiles, applications and channels to OADC
- Ensures all social media activities comply with this social media policy
- Provides input to new social media policies, standards and guidance through their CDC social media council representative

D. Office of the Associate Director for Communication

- Reviews and approves requests for the establishment of CDC-sponsored public, external social media, as applicable
- Maintains and makes available a list of CDC-sponsored public, external social media channels and applications
- Recommends additional policies/procedures, if required, for CDC-sponsored public, external social media channels and tools
- Develops and maintains usage guidelines, posting guidelines, and other guidelines needed for CDC social media use
- Provides oversight and management of social media channels and applications operated by CDC
- Recommends additional policies, if required, for social media related issues
- Provides oversight and management of CDC's primary social media channels and applications

E. CDC Employees and Managers

• Adhere to the requirements of this policy

F. CDC Records Officer

- Provides expertise in records documentation
- Provides records control schedules
- Provides other assistance for maintaining federal records

G. CDC Social Media Council

- Reviews and approves standards, guidelines and best practices related to CDC's social media use
- Reviews new CDC social media profiles prior to launch and provides feedback and recommendations to the C/I/O.

H. CDC Section 508 Coordinator

- Provide expertise in Section 508 compliance of social media technologies
- Review and approve developed social media applications

5. REFERENCES

- A. <u>Standards of Ethical Conduct for Employees of the Executive Branch</u>. United States Office of Government Ethics, October 2002.
- **B.** <u>HHS-OCIO-2010-0006H</u>, HHS-OCIO Policy for Information Systems Security and Privacy Handbook. September 22, 2010.
- C. HHS-OCIO Policy 2010-0003, OCIO Policy for Social Media Technologies. March 31, 2010.
- **D.** <u>HHS Rules of Behavior</u> (For Use of Technology Resources and Information). February 12, 2008.
- E. CDC-IS-2005-03, <u>Use of CDC Information Technology Resources</u>. Policy last updated September 2008.
- **F.** CDC-IS-2005-02, Controlled Unclassified Information Policy. Policy last updated July 22, 2009.
- **G.** CDC-IS-2006-01, <u>Identification of Contractors' Employees and Safeguarding Government</u> <u>Information</u>. January 9, 2006.
- H. <u>CDC-IS-2002-06</u>, Protection of Information Resources. Policy last updated March 12, 2010.
- I. CDC-GA-2005-06, <u>Clearance of Information Products Disseminated Outside CDC for Public</u> <u>Use</u>. July 22, 2005.
- J. <u>Disclosure of Confidential Information Generally</u>, 18 U.S.C. 1905 (Trade Secrets Act). July 3, 2007.
- K. CDC-CM-2007-01, Employee Communication Branding. April 9, 2007.
- L. CDC-CM-2009-01, <u>CDC Media Relations Policy: Release of Information to News Media</u>. Last updated March 9, 2011.
- M. CDC-GA-2002-04, <u>Use of Seals, Logos, and CDC Logo Design</u>. Last updated January 3, 2011.
- **N.** <u>CDC IT Security Program Implementation Standards</u>. March 13, 2011. See Appendix L: Social Media and Third-Party Site Security.
- **O.** CDC-GA-2002-03, <u>Identification of CDC on Print or Electronic Material</u>. Last updated March 8, 2010.
- P. <u>CDC/ATSDR Operationalization of the OMB Bulletin and HHS Draft Guidance Document on Disclaimers</u>.

Q. <u>Level III Software Products Security Evaluations</u>. CDC Office of the Chief Information Security Officer, last updated August 14, 2008.

6. ABBREVIATIONS AND ACRONYMS

ADCS – Associate Director for Communication Science

CDC – Centers for Disease Control and Prevention

C/I/O – Centers, Institute, Offices

CIO – Chief Information Officer, CDC

DPA – Division of Public Affairs

FOIA – Freedom of Information Act

GSA – General Services Administration

HCSO – Health Communication Science Office

HHS – Department of Health and Human Services

IT – Information Technology

NARA – National Archives and Records Administration

OADC – Office of the Associate Director for Communication

OADS – Office of the Associate Director for Science

OCISO – Office of the Chief Information Security Officer

OEC – Office of Enterprise Communication

OMB – Office of Management and Budget

7. DEFINITIONS

Applications: Widgets, Mashups

Channel or Site: Major social media channels such as Facebook, Twitter, YouTube, Mobile, texting

Mashup: a web page or application that uses and combines data, presentation or functionality from two or more sources to create new services

Profile: New instance or identity on an existing social media channel

Section 508: Requirement of federal agencies to make electronic and information technology accessible to people with disabilities, as mandated by a 1998 revision of the Rehabilitation Act of 1973

Widget: a CDC.gov application that displays the featured content directly on a personal web page. Content can be embedded in personalized home pages, blogs, and other sites. Once the widget is added, there's no technical maintenance. CDC.gov will update the content automatically

Exhibit A: Sample of Official Social Media Channels

CDC Facebook Page: <u>http://www.facebook.com/CDC</u> CDC YouTube Channel: <u>http://www.youtube.com/user/CDCStreamingHealth</u> CDCgov Twitter Profile: <u>http://twitter.com/CDCgov</u>

Exhibit B: Guidelines and Best Practices

<u>CDC Social Media Tools Guidelines & Best Practices</u>: These guidelines have been developed to assist in the planning, development and implementation of social media channels and activities at the Centers for Disease Control and Prevention (CDC). They provide critical information on lessons learned, best practices, clearance information and security requirements when using these channels.

<u>Social Media Toolkit for Health Communicators</u>: This toolkit provides guidance in developing governance for social media, determining which channels best meet communication objectives, and help in creating a social media strategy.

Note: This policy has been cleared for publication on CDC.gov. As a CDC operational policy, it contains references or links to the CDC intranet. These internal links will not work for users accessing this document outside of the CDC network.