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Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005

REPRESENTING EPA ONLINE USING SOCIAL MEDIA

1. PURPOSE

These procedures provide the steps and principles that must be considered when representing EPA online in an employee's official capacity while using social media. For purposes of these procedures, "social media" is a term for a wide spectrum of user-driven content technologies.

2. SCOPE AND APPLICABILITY

These procedures apply to EPA employees representing EPA online in their official capacities and to contractors working on behalf of EPA. These procedures replace the "Interim Guidelines for EPA Employees who are Representing EPA Online Using Social Media," but otherwise do not supersede or replace existing legal responsibilities and policies in effect. These procedures do not apply to employees' online activities while not on official duty; however, employees are always bound by the Standards of Ethical Conduct for Employees of the Executive Branch, the conflict of interest statutes, and the Hatch Act. There are ethical obligations to follow even when employees are engaged in their personal capacities. For example, even in their personal capacities, employees should not misuse their EPA positions or titles nor engage in partisan political fundraising.

3. AUDIENCE

The audience for this policy includes any EPA employee, contractor, or other person who uses social media on behalf of EPA.

4. BACKGROUND

Social media platforms like Facebook and Wikipedia offer EPA employees the chance to engage with the public in new ways. The general public has a strong interest in EPA, and they are using social media tools to share information and opinions about the Agency's activities. It benefits environmental protection to both create new social media tools and, where appropriate, participate in existing tools by adding the Agency's official perspective or correcting errors.

5. AUTHORITY

CIO Policy 2184.0: Social Media Policy (June 20, 2011)

5 C.F.R. 2635.703 Standards of Ethical Conduct for Employees of the Executive Branch (PDF)

6. PROCEDURES

When employees participate on EPA's behalf in social media as part of their official duties, they are representing the Agency. They should exercise the same decorum and professionalism that they would if they were speaking on EPA's behalf at a conference or public meeting. Even online, when we are functioning in an official capacity, we are the Agency's representatives and the same

managerial considerations and ethical principles apply.
- Employees must obtain their supervisor's approval before representing EPA online, and must not opine on behalf of the Agency in areas that are outside their assigned duties.
- Any posting performed by Agency employees acting in their official capacity should be properly cited and fully supported.

Examples of representing EPA online include, but are not limited to, writing posts for, commenting on non-EPA blogs, chatting in an online forum, or editing a non-EPA wiki (such as Wikipedia).

Steps for representing EPA online in an official capacity

1. **Represent your office**. The line between public and private, personal and professional can sometimes get blurred in online social networks.
   - It is important that you remember that you are participating in your official capacity and not in your personal capacity. Make sure that your online activities and online content associated with you while you are officially representing EPA are consistent with your job responsibilities at EPA.
   - If you see online errors about EPA that are not in your area of expertise or you are not authorized to represent EPA in regard to the subject matter, then pass them on to someone who is an expert in the area or who is authorized to represent EPA in regard to that issue. If you do not know whom to contact, please consult with your supervisor or the Office of External Affairs and Environmental Education (OEAEE).

2. **Respect your time and effort and obtain approval.** Consider the time and effort needed to respond and the value of your participation. Discuss the following with your supervisor and obtain approval, whether creating a new item or responding to an existing item. Contractors should discuss and obtain approval from their EPA contract manager.
   a. Time to research and write a posting, response, or edit.
   b. Likely viewership and value of participating.
   c. Importance of the issue.

3. **Identify your EPA affiliation.** Because you are participating in your official capacity, you may create a profile on social media sites that identifies you as an employee of the "U.S. Environmental Protection Agency" and use your work email address.
   - Do not comment or edit anonymously.
   - Remember that your actions reflect on the Agency.
   - If you are an EPA contractor, you should make that fact clear and identify your company.

4. **State facts, not opinions.** Generally, when representing EPA online, do not engage in discussions of opinion about EPA's programs, because promoting ourselves instead of focusing on facts could be construed as propaganda or lobbying.
   - Cite your sources when stating facts.
   - In some cases, you may be authorized to express official opinions through submitting op-ed or similar articles to online publications. If you wish to do so, you must obtain permission from your Communications Director or Public Affairs Directors and comply with applicable publication policies and use of disclaimers.

5. **Identify supporting sources.** If a supporting source is online, then provide information so that others can access it. Online support may include EPA Web pages and other materials including video and audio; offline bibliographical references are second-best. Do not edit or write without supporting citations, and include a disclaimer to clarify that references made to non-EPA information do not constitute an endorsement.

6. **Protect nonpublic information.** Social media blur many of the traditional boundaries between internal and external communications.
   - Be thoughtful about what you publish or post online.
   - Do not disclose or use nonpublic information.
   - Pay attention to the rules about misuse of position.
   - If you would not say something offline or include it in a written letter, do not post it online.

For more information about nonpublic information refer to Standards of Ethical Conduct for Employees of the Executive Branch (PDF) (85 pp, 325K), specifically 5 C.F.R. 2635.703. (http://www.usoge.gov/ethics_docs/publications/reference_publications/rfsoc.pdf)

7. **Ethics apply, even online.** As an EPA employee, you are bound by the Standards of Ethical Conduct for Employees of the Executive Branch.
   - Do not use your public office or EPA position, title or authority for private gain.
   - Do not misuse government property or government time.
   - Do not divulge nonpublic information, which includes any information that is exempt from disclosure that is designated as confidential, or has not actually been disseminated to the public and is not authorized to be made available to the public upon request.
   - Abide by the Hatch Act and do not lobby.
   - Contractors must follow contracting rules.

   Simply put, behave professionally, responsibly, impartially and above all ethically, and with your supervisor's approval. More information about EPA Ethics Program (http://intranet.epa.gov/ogc/ethics.htm)

8. **Maintain records when applicable.** Agency records created or received using social media tools must be managed according to the applicable records schedule in a recordkeeping system. More information about records and social media can be found at EPA Records Management Program (www.epa.gov/records) and Section 15 (Maintain Records) of Using Social Media to Communicate with the Public Procedure.

9. **Share your experiences and best practices.** To help all of EPA learn good models for online engagement, please inform your Web Content Coordinator (http://www.epa.gov/webgovernance/leadership.html), who will track these types of activities for your program office or Region.
   a. If your social media use is a one-time event, send the URL and a brief summary of the situation.
   b. If your participation is ongoing, let the Web Content Coordinator know the general nature of what you are doing. (For example, you are generally monitoring relevant blogs and commenting where appropriate.)

   The flow chart, Should I Respond Online on EPA's Behalf? (PDF) provides questions that may help guide your decisions. The flow chart is included as an attachment.

7. RELATED DOCUMENTS

Please refer to the CIO Policy 2184.0: Social Media Policy (June 20, 2011)

8. ROLES AND RESPONSIBILITIES

The Chief Information Officer/Assistant Administrator, Office of Environmental Information, and the Associate Administrator for External Affairs and Environmental Education are jointly responsible for monitoring compliance with this procedure.

Office of Environmental Information (OEI) applies the requirements of this procedure in its functions of providing appropriate Agency-wide web technology services and security, policy, guidance, and technical assistance to Program and Regional offices. OEI develops policy and procedures for social media use in consultation with OEAEE.

OEAEE applies the requirements of this procedure in its functions of managing communications and product review, specifically the Office of Web Communications (OWC). OEAEE also develops Terms of Service agreements with third-party sites in consultation with OEI and the Office of General Counsel. OEAEE develops and implements social media awareness training in conjunction with OEI.

Office of General Counsel (OGC) provides legal guidance relating to the Web, reviews and approves terms of service, and oversees ethics requirements for EPA employees.

Office of the Inspector General (OIG) will adhere to the Social Media Policy to the extent that it is not inconsistent with the Inspector General Act of 1978, as amended, or with the policies, procedures, and guidelines established by the Office of Inspector General.

Senior Information Officials (SIOs) serve as the primary point of accountability for the effective oversight, coordination, and management of information and information technology (IT) within their respective organizations and are responsible for ensuring that their office is in compliance with EPA's Social Media Policy, procedures and supporting documents.

Information Management Officers (IMOs) support their respective SIO in implementing the SIO's information technology and information management functions and responsibilities.

Communication Directors in program offices are responsible for managing communications from their organizations, including Web efforts.

Public Affairs Directors at Regional Offices are responsible for managing communications from their organizations, including Web efforts.

Web Content Coordinators, as members of the Web Council, are responsible for working with their respective regional and program offices to discuss appropriate social media usage for that office in accordance with OEAEE and OEI web policy and web practices.

Web Infrastructure Coordinators, as members of the Web Council, are responsible for working with their respective regional and program offices to discuss appropriate social media usage for that office in accordance with OEAEE and OEI web policy, procedures, and web practices.

Records Liaison Officer (RLO) - A person responsible for overseeing a records management program in a headquarters or field office in cooperation with the agency records management officer.

Regional and program offices provide quality content and appropriate infrastructure and resources to communicate the Agency's work and mission on the web. Regional and program offices may provide additional procedures and guidance as needed to meet their respective priorities, provided they do not conflict with those that apply to the Agency as a whole. Ultimate accountability for Region and program areas on the web is at the most senior level, typically at the Assistant Administrator or Regional Administrator level.

9. **DEFINITIONS**
Disclaimer - A statement that limits or specifies rights or obligations. In many instances you will need to include the standard disclaimer that views expressed are opinions and not official Agency policy. Another often-used disclaimer is the standard exit disclaimer when you include a link to an outside website.

Records - Include all books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the United States Government under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them. Library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of

documents preserved only for convenience of reference, and stocks of publications and of processed documents are not included. (Source: 36 CFR 1220.14)

Social Media - any online tool or application that goes beyond simply providing information, instead allowing collaboration, interaction, and sharing. Examples of social media include: blogs; microblogs; wikis; photo and video sharing; podcasts; virtual worlds; social networking; social news and bookmarking; web conferencing and webcasting.

Third-party website – for purposes of this procedure, any website that is not owned, operated or co-sponsored by EPA. Refers to sites as a whole; EPA accounts on such sites are still third-party, even though EPA controls the content of those accounts.

10. WAIVERS

There are no waivers from this procedure.

11. RELATED PROCEDURES, STANDARDS AND GUIDANCE

Using Social Media Internally at EPA Procedure, CIO 2184.0-P01.1 (http://intranet.epa.gov/oeiintra/imitpolicy/policies.htm June 20, 2011)

Using Social Media to Communicate with the Public Procedure, CIO 2184.0-P02.1 (http://intranet.epa.gov/oeiintra/imitpolicy/policies.htm June 20, 2011)

Requirements for creating, customizing, and maintaining Web products on the Agency's Public Access and Intranet servers are found at: http://www.epa.gov/webguide

EPA Order CIO2101.0 A1, "Policy on Limited Personal Use of Government Office Equipment," covers limited personal use of government-owned office equipment. http://intranet.epa.gov/oei/imitpolicy/qic/ciopolicy/2101-0.pdf

Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. Part 2635, http://www.usoge.gov/ethics_docs/publications/reference_publications/rfsoc_02.pdf

All design requirements for public access EPA web pages (www.epa.gov) are found at: http://yosemite.epa.gov/oei/webguide.nsf/standards-guidance

Best practices and general information about EPA and social media can be found on the Social Media @ EPA blog: http://blog.epa.gov/socialmedia/

All Office of Environmental Information (OEI) Information Management and Information Technology (IM/IT) policies are located at: http://intranet.epa.gov/oei/imitpolicy/policies.htm

EPA's administrative policies issued through the Office of Administration and Resources Management (OARM) Directives Clearance Review Process are located at: http://intranet.epa.gov/policy/index.htm

Federal Web requirements, best practices, and guidance are found at Webcontent.gov http://www.usa.gov/webcontent/

12. MATERIAL SUPERSEDED

Interim Guidance, "Representing EPA Online Using Social Media," January 26, 2010.

13. ADDITIONAL INFORMATION

For further information about this policy, please contact the Policy and Program Management Branch, Office of Information Analysis and Access, in the Office of Environmental Information.

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and Chief Information Officer
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