

Corporation for National and Community Service

**Policies and Procedures**

**Policy Number: OPA 2009-01-2011-1**

**Effective Date: March 15, 2011**

**Revision Number:**

**Subject: Social Media Policy**

1. Purpose: This policy governs the use of social media for internal and external communications purposes. It is based on the template provided for the use of federal agencies by the U.S. General Services Administration.
2. Who is Covered: This policy applies to all CNCS employees. It also applies to contractors engaged in social media on behalf of CNCS as part of their duties.
3. Policies Cancelled: COO-800-2000, CNCS Policy on Listservs is cancelled..
4. Background: CNCS encourages the use of social media technologies to enhance communication, collaboration, and information exchange in support of the CNCS mission. By openly sharing knowledge, best practices, and lessons learned within the agency, with and from other federal, state, and local partners, and with and from the public, we can provide more effective solutions and efficiencies to enhance excellence in the business of government.
5. Originating Office: Office of Public Affairs

**Corporation employees can access this document electronically at [intranet.cns.gov](http://intranet.cns.gov)**

**Approved By:**

**James Siegal**

**Chief of Staff**

**[Signed version on file with Office of the Policy Coordinator]**

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## Chapter 1: Introduction

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### *Purpose*

This policy establishes CNCS guidance regarding the use of social media tools to facilitate collaboration and information sharing inside and outside of the agency. The scope includes the use of social media technologies hosted outside of federal government servers, social media technologies hosted on internal federal government servers, and individual user’s responsibilities when accessing social media services in either environment.

### *Applicability*

This policy applies to all CNCS employees. It also applies to contractors engaged in social media on behalf of CNCS as part of their duties. Compliance with the provisions of this policy is the responsibility of supervisors for employees and COTRs for contractors.

### *Background*

CNCS encourages the use of appropriate social media technologies to enhance communication, collaboration, and information exchange. CNCS has signed agreements with social media providers that make it possible for CNCS employees to use external social media technologies for official use while meeting their current legal requirements.

Social media tools are network-enabled and include interactive features and user-generated content. Tools include wikis, blogs, mash-ups, web feeds (such as Really Simple Syndication (RSS) feeds), moderated discussion tools, social networking sites, and virtual worlds. These tools are evolving rapidly and are shaping how we work with our customers, business partners, other government agencies, and the public.

Use of these technologies must follow the current laws and guidelines that govern information and information technology. These statutes and regulations include, but are not limited to accessibility, records management, privacy, security, and information quality.

### *Definitions*

#### **Social Media Technologies**

Social media is the collection of Web tools that facilitate collaboration and information sharing. Web-based communities and hosted services include social-networking sites, video and photo sharing sites, wikis, blogs, virtual worlds, and other technologies.

**Internal Social Media Technologies**

Social media on agency-controlled servers (within CNCS or via contract to CNCS). This could include, for example, wiki and blogging software installed on the agency's own infrastructure or a website on an outside server under contract with CNCS.

**External Social Media Technologies**

Social media on servers over which the agency has no control. This includes proprietary social networking sites such as Facebook and as well as collaboration services such as Wikipedia and blog hosting sites.

**Blog**

A web-based forum with regular entries of commentary, descriptions of events, or other materials where the blog host posts material on the website, and others may provide comments. Blogs may be moderated by the host or may allow any material to be posted.

**Micro-Blog**

Extremely short blog posts. The messages can either be viewed by anyone or by a restricted group that is chosen by the user. Twitter, a popular micro-blog client, allows for posts of up to 140 characters in length to be uploaded and read online or through instant messaging or mobile devices via text messaging.

**Cloud Computing**

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

**Mashup**

A web-based presentation of information that combines data and/or functionality from multiple sources.

**Non-public Information**

Nonpublic information is any information for which the general public is not authorized access in accordance with federal laws, Executive Orders, directives, policies, regulations, standards, or guidance. Information protected under the Privacy Act and vendor proprietary information are examples of nonpublic information.

**Photo Sharing**

Websites which allow users to post and share digital photos. These sites typically allow commenting and meta-data to be attached to photos.

**Podcast**

A way of publishing MP3 audio files on the web so they can be downloaded onto computers or portable listening devices. Podcasting allows users to subscribe to a feed of new audio files using software which automatically checks for and downloads new audio files.

**RSS Feed**

A web content format which, when used with an RSS aggregator, alerts users to new content on a website. RSS feeds enable users to avoid the conventional methods of browsing or searching for information on websites.

**Social Bookmarking**

A web-based service where users create and store links. Although web browsers have the ability to bookmark pages, those links are tied to one particular browser and computer. Social bookmarking, in contrast, is tied to an online account, which can be made public.

These bookmarks can be shared and discovered by others. Examples of social bookmarking sites include Digg and Reddit.

**Social Networking Services**

Tools used to connect people who share the same interests and/or activities, or who are interested in exploring the interests and activities of others. Social network services are Internet based and provide a variety of ways for users to interact. CNCS electronic mailing lists are considered social networking services for the purpose of this policy.

**Widgets**

Interactive tools with single-purpose services such as displaying the latest news and weather, a map program, or photos.

**Wiki**

A collection of web pages that encourages users to contribute or modify the content. By using a simple web interface, a community can collaborate on developing a document or web page, no matter where they're located. Wikipedia is an example.

**Video Sharing**

Websites on which users post video they have taken for others to view and comment on. YouTube is an example.

**Virtual Worlds**

Imagined places where users can socialize, connect and create using voice and text chat. Second Life is an example.

## Chapter 2: Social Media Guidelines

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### *Purpose*

CNCS uses and hosts social media forums to improve communications with employees, government customers, commercial suppliers and the general public. The use of social media is an element of CNCS business communications and this chapter provides guidelines on how to establish and maintain a CNCS-sponsored external or internal blog or other social media website. The Office of Information Technology (OIT) supports enterprise operations and the Office of Public Affairs oversees editorial use.

The use of commercial social media web sites is an opportunity for supplementing how CNCS reaches its target audiences. However, the use of a social media site should never replace official communication channels, such as [www.nationalservice.gov](http://www.nationalservice.gov). Because these sites evolve at a rapid pace, how to best incorporate them will need to be tailored to your department or office's needs and its overall communications strategy.

### *Process for Initiating an Official CNCS-sponsored Social Media Site*

- (1) A Social Media Request Form is used to initiate a blog or official CNCS presence on any social networking site (see attached). For example, the AmeriCorps State and National outreach Twitter feed would require a Social Media Request Form. A Corporation employee encouraging Facebook friends to participate in the MLK Jr. Day of Service would not require a Social Media Request form. Signed requests should be submitted to Amy Borgstrom [aborgstrom@cns.gov](mailto:aborgstrom@cns.gov) in pdf form or via fax (202) 606-3476.
- (2) Requests must be approved by the originator's office or unit director, the Office of General Counsel, and the Office of Public Affairs. CNCS must have a Terms of Service agreement with any external hosting service.
- (3) Requests should include a title for the blog or CNCS social media site, a short statement about the purpose and/or value of the site, and a desired URL shortcut (typically some variation of the unique site name, but in all lower case, no spaces, no special characters, e.g., /CNCSscioblog). Logos should be incorporated according to Corporation rules on logo use.
- (4) If hosting a blog or other social media presence outside of CNCS, then indicate where it will be hosted and why that is preferable to hosting the blog internally. If hosting the site internally, any specialized software must be approved and installed by OIT in accordance with current OIT policy.
- (5) The originator of the request will name the host(s) in the request.
- (4) Monitoring the site is the responsibility of the host(s) designated by the Originator. The Originator, or a designee, appointed in writing and designated on the Social

Media Request Form, must ensure proper supervision of the site to ensure the information is accurate, timely, relevant, complete, and does not reflect adversely on CNCS or the United States Government. This responsibility includes inactivating the site upon the site host's termination and/or notifying OIT and OPA that the site has been transferred to another individual.

- (5) The Originator or designee must review the site quarterly for nonpublic information and provide a statement to the CNCS Privacy Officer stating that the review was conducted and if nonpublic information was found during the review.
- (6) The site will be suspended if any of the following occurs:
  - 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.
  - Seeking donations to an individual, group, non-profit or for-profit organization, or cause; or endorsement of fundraising events without explicit approval of the CEO.
  - Discussion of topics unrelated to CNCS's mission.
  - Failure to adhere to the posting requirements and disclaimers contained in Paragraph (2), Posting Policy, below.
  - Failure to make Section 508 compliant postings.
  - Failure to follow the latest guidance posted on the Intranet intended for CNCS social media sites.

### ***Guidance for Hosts***

- Blogs and other social media sites succeed when visitors feel they have reached a trusted source of information. The blog should let readers know who the host is from a professional standpoint.
- Do not release any personal information that the general public should not know, for example releasing home addresses or phone numbers.
- Be prepared to post content on a regular basis. This may mean daily, weekly, but not less frequently than every two weeks. Let readers know what the posting schedule is. Be realistic in preparing a schedule. It is always better to increase frequency over the life of the site. If a social media site remains idle for 60 days or more, CNCS reserves the right to take it offline.
- Be prepared to make time and devote resources to moderating all comments that readers post. Be committed to reading every comment received, even if nothing is posted in response to all of them. Time may be needed to research responses.
- Communicate to the audience the timeframe within which the comment may be posted.
- Invite guest contributors. This is a great way to enhance value without increasing workload. Be sure to work with the Office of General Counsel to include appropriate disclaimer language for non-Corporation contributors.
- Be prepared to respond to posted comments, especially negative ones, or be very clear that you will not be responding to individual comments in the description of the blog.

- If the same questions are posed over and over again, consider creating boilerplate responses to some questions.
- Be aware that there are a variety of ways people will find the social media site (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). This means the individuals will often be reading only a headline (or title), or a headline and a couple of sentences.
- The more intriguing and relevant the headline of the posting and the content that follows, the more likely the content is to build readership.

### ***Social Media Posting Requirements and Disclaimers***

The sections below identify required statements and disclaimers for CNCS -sponsored blogs and social media sites. These statements, or links to pages containing them, should be located on the main page of every CNCS sponsored social media site.

(1) General Policy. The Corporation for National and Community Service (CNCS) manages this to provide a forum for improving communications with our employees, government customers, our commercial suppliers, and the general public. This site will discuss (Subject matter of site, e.g. information technology, schedules, communications, building issues, etc.). This site use policy is subject to amendment or modification at any time to ensure the site's continued use is consistent with its intended purpose as a limited forum.

(2) Posting Policy. You are encouraged to share your comments, ideas, and concerns. CNCS will delete comments that contain abusive, vulgar, offensive, threatening or harassing language, personal attacks of any kind, or offensive terms that target specific individuals or groups. CNCS will delete comments that are clearly off-topic, that promote services or products, or that promote or oppose any political party, person campaigning for elected office, or any ballot proposition or pending legislation. Gratuitous links to sites are viewed as spam and may result in the comment being removed.

Communications made through the site's e-mail and messaging system will in no way constitute a legal or official notice or comment to CNCS or any official or employee of CNCS for any purpose. The content of all comments are released into the public domain unless the commenter clearly states otherwise, so do not submit anything you do not wish to be broadcast to the general public. CNCS does not discriminate against any views, but reserves the right not to post comments that do not adhere to these standards. CNCS will make best efforts to review comments and post them as quickly as possible.

(3) Product References by Site Host. Any references to commercial entities, products, services, or other nongovernmental organizations or individuals that are included in this site are provided solely for the information of individuals using this site.

These references are not intended to reflect the opinion of CNCS, the United States Government (Government), or its officers or employees concerning the significance, priority, or importance to be given the referenced entity, product, service, or organization.

Such references are not an official or personal endorsement of any product, person, or service, and may not be quoted or reproduced for the purpose of stating or implying CNCS or Government endorsement or approval of any product, person, or service.

(4) Records Management. All social media sites must conform and comply with the agency's records maintenance and disposition system to the greatest degree possible.

(5) Linking Policy. The (Site Name) site may include useful hypertext links or pointers to information created and maintained by other public and private organizations and individual's sites. All hypertext links must conform to all points in Section 6. (Site Name) provides these links and pointers solely for the site users' information and convenience.

When a user selects a link to an outside website, he/she is leaving the (Site Name) site and is subject to the privacy and security policies of the owner/sponsor of the outside website. Hyperlinks to information created and maintained by other public and private organizations should not be construed as an endorsement of the views or privacy policies contained on those linked pages.

- CNCS does not control or guarantee the accuracy, relevance, timeliness or completeness of information contained on a linked website.
- CNCS does not endorse the organizations sponsoring linked websites, and do not endorse the views they express or the products/services they offer.
- CNCS cannot authorize the use of copyrighted materials contained in linked websites. Users must request such authorization from the sponsor of the linked website. Those who provide comments are responsible for the copyright of the text they provide.
- CNCS is not responsible for transmissions users receive from linked websites.
- CNCS does not guarantee that outside websites comply with Section 508 (Accessibility Requirements) of the Rehabilitation Act.

(6) Copyright Information. Links to CNCS sites are welcomed. Unless a copyright is indicated, information on CNCS's sites is in the public domain and may be copied and distributed without permission. Citation to the U.S. General Services Administration as the source of the information is appreciated. If a copyright is indicated on a video, photo, graphic, or other material, permission to copy the material must be obtained from the original source.

(7) Privacy. (Site Name) follows the CNCS.gov privacy policy. CNCS will not share or sell any personal information obtained from users with any other organization or government agency except as required by law. Please view our complete Privacy and Security Policy. To protect your own privacy, and the privacy of others, please do not

include phone numbers, e-mail addresses, or other personal information in the body of your comment.

The (Site Host Office Name) manages this site as a portal for information from CNCS. However, information posted on this site is not official policy of CNCS and will in no way grant anyone any rights, privileges, or standing on any matter. All information should be verified through official channels at CNCS.

### **Chapter 3: Section 508**

Section 508 of the Rehabilitation Act of 1973, (as amended), requires that electronic and information technologies purchased, maintained, or used by the federal government meet certain accessibility standards. These standards are designed to make online information and services fully available to the 54 million Americans who have disabilities, many of whom cannot access information that does not comply with the Section 508 standards.

Agencies are required by the Federal Acquisition Regulations to modify acquisition planning procedures to ensure that the 508 Standards are properly considered, and to include the standards in requirements documents. OMB reminds agencies to disseminate information to the public on a timely and equitable basis, specifically mentioning meeting the Section 508 requirements in OMB Memorandum M-06-02.

Agencies employing non-federal Web 2.0 services are required to ensure that persons with disabilities have equal access to those services as defined in the Accessibility Standards. The agency must evaluate the accessibility of the non-federal site and consider the accessibility of all available alternatives. If dissemination of information in an accessible manner constitutes an undue burden on the agency, a non-accessible non-federal site may still be used, but the agency must make the information available in alternative formats for individuals with disabilities. In these cases, the program office must document these evaluations and determinations. Resources: Section 508 of the Rehabilitation Act, OMB Memo M06-02

### **Chapter 4: Records Management, Retention, and Archiving**

#### ***Records Management, Retention and Archiving***

All records, including information posted, received and/or connected in any way with CNCS social media websites that meet the definition of a record, will adhere and conform to all documentation contained in but not limited to federal-wide requirements on records maintenance and disposition.

According to 44 USC 3301 the definition of a federal record is “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, 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.”

When using electronic media, whether it is a blog, a website, a wiki, email, or any other type of electronic communications, the regulations that govern proper management, archival of records, and release (Freedom of Information Act) apply. CNCS users working with the Records Management Officer determine the most appropriate methods to capture and retain records on both government servers and technologies hosted on non-federal hosts. Note that the regulations apply to content that is removed as well as content that remains posted.

The National Archives and Records Administration offers resources and guidance to agencies to ensure proper records management.

### **Chapter 5: Information Quality**

The public places a high degree of trust in .gov content and considers it an authoritative source. Under the Information Quality Act and associated guidelines, agencies are required to maximize the quality, objectivity, utility, and integrity of information and services provided to the public. With regard to social media information dissemination products, agencies must reasonably ensure suitable information and service quality consistent with the level of importance of the information.

Reasonable steps include: 1) clearly identifying the benefits and limitations inherent in the information dissemination product (e.g., possibility of errors, degree of reliability, and validity), and 2) taking reasonable steps to remove the limitations inherent in the product or information produced. Agency management must ensure that the agency position is reflected in all communications rather than one person's opinion. Resource: Information Quality Act, Pub. L. No. 106-554

### **Chapter 6: Availability to Persons with Limited English Proficiency**

Executive Order 13166 requires that agencies take reasonable steps to ensure meaningful access to their federally conducted programs and activities by persons with limited English proficiency (LEP). The use of social media technologies to communicate and collaborate with citizens is a federally conducted activity. In order to ensure meaningful access by LEP individuals, agencies must conduct a flexible and fact-dependent individualized assessment that balances four factors; (1) the number or proportion of eligible LEP persons, (2) the frequency of contact, (3) the nature and importance of the program or activity, and (4) the availability of resources. This framework was established by the U. S. Department of Justice (DOJ) pursuant to Executive Order 13166 to guide federal agencies on the implementation of and compliance with the Order. For more information on LEP at CNCS, please contact CNCS's Office of Civil Rights and Inclusion (OCRI).

### **Chapter 7: Availability of Information and Access to Persons without Internet**

Agencies are required to provide members of the public who do not have Internet connectivity with timely and equitable access to information, for example, by providing hard copies of reports and forms. For the most part, using social media technologies as an exclusive channel for information distribution would prevent users without Internet

access from receiving such information. In addition, some social media services require high speed Internet access and high bandwidth to be effectively utilized, which may not be available in rural areas or may be unaffordable. In general, this requirement is no different for social media implementations than it is for other electronic service offerings. Programs must simply make alternative, non-electronic, forms of information dissemination available upon request. Resources: OMB Circular A-130 section 8 (See a5(d)) and Appendix IV

### **Chapter 8: Usability of Data**

Agency public websites are required, to the extent practicable and necessary to achieve intended purposes, to provide all data in an open, industry standard format that permits users to aggregate, disaggregate, or otherwise manipulate and analyze the data to meet their needs. Agencies need to ensure that these open industry standard formats are followed to maximize the utility of their data. Resource: OMB Memo M-05-04 and M-10-06.

### **Chapter 9: Intellectual Property**

The use and management of social media technologies raises several questions about the legal concepts of copyright, fair use, and intellectual property ownership. Agencies must be diligent to ensure that they consider existing intellectual property and copyright laws when implementing social media technologies.

While the federal government typically provides public data which is not considered copyrightable intellectual property, social media technologies that allow public contribution of content may potentially create challenges regarding the protection of intellectual property contributed by visitors. The ease of copying and propagating data from many sources on the Internet makes it very easy to unintentionally breach copyright laws. Most commercial media sharing websites warn of the illegal use of copyrighted materials and trademarks. This strategy may or may not prove sufficient to protect the interests of government agencies, depending on specific circumstances.

Agencies must establish policies and post clear disclaimers detailing the copyrights that non-government contributors to their sites may retain. Government content on any site is generally public domain and therefore can not become the intellectual property of an individual or be protected by a site provider. Care must be taken to not create the appearance of a copyright on a government created work, unless specifically permitted by statute. Resources: Copyright.gov, U.S. Trademark Law

### **Chapter 10: Privacy**

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

OMB policy mandates that federal websites are prohibited from using persistent cookies and other web tracking methods unless their use has been approved by an agency head or designated agency sub-head, for a compelling need. When approved in this fashion, agencies must post clear notice of the nature of the information collected in the cookies, the purpose and use of the information, whether or not and to whom the information will be disclosed, and the privacy safeguards applied to the information collected. Resource: OMB Memo M-03-22

Although some social media websites are exempt from the prior requirements since they are not federal websites, CNCS is required to protect personally identifiable information on internal websites or pages on external social media websites. If Personally Identifiable Information (PII) is accidentally placed on a corporation-sponsored social media website, an incident report must immediately be submitted by the CNCS staff member who discovers the PII, using the on-line Security Incident Report located on the CNCS portal homepage at: <http://portal.cns.gov>.

The Privacy Act of 1974 (as amended) may also apply to the activities undertaken on social media platforms, and individuals should consult with the CNCS Privacy Officer and Office of General Counsel to ensure they are in compliance with all privacy protection requirements.

### **Chapter 11: Federal Advisory Committee Act**

Since many social media technologies excel at enabling information sharing across the Internet, government programs may use them to share ideas regarding current and future plans, to gather opinions about a wide variety of issues and to strengthen the relationship between citizens and their government.

Depending on circumstances (such as targeting specific experts for an online discussion of proposed policy), some of these efforts, depending on how they are structured, may meet the functional definition of a virtual or electronic advisory group and therefore fall under the purview of the federal Advisory Committee Act (FACA). Just because an advisory committee meeting is held in virtual space instead of office space, it is not exempt from the government's rules on such activities.

Any advisory group, with limited exceptions, that is established or utilized by a federal agency and that has at least one member who is not a federal employee, must comply with the FACA. In general, when government agencies seek input and suggestions from the general public on various issues, FACA likely would not apply. However, if the government is managing and controlling the group in any way, such as selecting members, setting an agenda, or consolidating results generated by the group of participants, the group would fall within the bounds of FACA. Resource: FACA

### **Chapter 12: Information Collection & Paperwork Reduction Act**

Agencies are required, when practicable, to use electronic forms and filing to conduct official business with the public, and social media technologies can be used in many

cases to meet this need. Federal public websites must ensure that information collected from the public minimizes burden and maximizes public utility.

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

### **Chapter 13: Lobbying**

18 USC 1913 prohibits the use of appropriated funds for purposes of lobbying a member of Congress. The use of appropriated funds may extend to the payment of employee salaries, equipment, office space, etc. Such funds may not be “used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a Member of Congress, to favor or oppose, by vote or otherwise, any legislation or appropriation by Congress, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation...”

Federal employees using social media should be mindful of 18 USC 1913, because a violation or attempt to violate the statute may result in a fine or imprisonment, as well as a removal from government office or employment. Resource: 18 USC 1913  
References [http://www.usa.gov/webcontent/reqs\\_bestpractices/omb\\_policies.shtml](http://www.usa.gov/webcontent/reqs_bestpractices/omb_policies.shtml)

**Social Media Request Form**

Originator:

Title:

Extension:

Name of Proposed Social Media Site:

Purpose/Value of Proposed Social Media Site:

Internal url:

Need specialized software:

External url:

External justification:

Host(s), Titles, and extensions:

This site will include all required disclaimers.

Signature of Originator

Date:

Approved by Office/Unit Director:

Date:

Approved by Office of General Counsel:

Date:

Approved by Office of Public Affairs:

Date: