



United States Department of State
and the Broadcasting Board of Governors

Office of Inspector General

OFFICE OF INSPECTIONS

Review of the Use of Social Media
by the Department of State

Report Number ISP-I-11-10, February 2011

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PURPOSE, SCOPE AND METHODOLOGY OF THE INSPECTION

This inspection was conducted in accordance with the Quality Standards for Inspections, as issued by the President's Council on Integrity and Efficiency, and the Inspector's Handbook, as issued by the Office of Inspector General for the U.S. Department of State (Department) and the Broadcasting Board of Governors (BBG).

Purpose

The Office of Inspections provides the Secretary of State, the Chairman of the BBG, and Congress with systematic and independent evaluations of the operations of the Department and the BBG. Inspections cover three broad areas, consistent with Section 209 of the Foreign Service Act of 1980:

- **Policy Implementation:** whether policy goals and objectives are being effectively achieved; whether U.S. interests are being accurately and effectively represented; and whether all elements of an office or mission are being adequately coordinated.
- **Resource Management:** whether resources are being used and managed with maximum efficiency, effectiveness, and economy and whether financial transactions and accounts are properly conducted, maintained, and reported.
- **Management Controls:** whether the administration of activities and operations meets the requirements of applicable laws and regulations; whether internal management controls have been instituted to ensure quality of performance and reduce the likelihood of mismanagement; whether instance of fraud, waste, or abuse exist; and whether adequate steps for detection, correction, and prevention have been taken.

Methodology

In conducting this inspection, the inspectors: reviewed pertinent records; as appropriate, circulated, reviewed, and compiled the results of survey instruments; conducted on-site interviews; and reviewed the substance of the report and its findings and recommendations with offices, individuals, and organizations by this review.



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PREFACE

This report was prepared by the Office of Inspector General (OIG) pursuant to the Inspector General Act of 1978, as amended, and Section 209 of the Foreign Service Act of 1980, as amended. It is one of a series of audit, inspection, investigative, and special reports prepared by OIG periodically as part of its responsibility to promote effective management, accountability and positive change in the Department of State and the Broadcasting Board of Governors.

This report is the result of an assessment of the strengths and weaknesses of the office, post, or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG and, as appropriate, have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "H. W. Geisel".

Harold W. Geisel
Deputy Inspector General

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KEY JUDGMENTS

- Embassies are actively involved in social media, but successful sites with original content and strong interaction with their audience require a serious commitment of staff time.
- The new *Foreign Affairs Manual* (FAM) subchapter on social media provides useful and needed guidance on social media, but missions will need additional reminders of requirements.
- Some portions of the new FAM subchapter are complex or not easily interpreted, and missions will need further guidance and advice.

In the Office of Inspector General (OIG) FY 2010 inspection cycle, public diplomacy inspectors began looking systematically at embassies' use of social media. However, the on-the-ground inspections took place before the issuance of the new social media FAM subchapter, so inspectors could not measure embassies against the new regulations. The focus was on more general questions, such as the extent to which embassies were using social media, the chief challenges they faced, the degree to which the use of social media was connected to the Mission Strategic and Resource Plan (MSRP), methods of measurement, and the quality of technical support.

To supplement the inspectors' reporting, in August 2010, OIG staff examined a sampling of the Facebook sites of those embassies that were in the FY 2010 and FY 2011 inspection cycles. The purpose of this examination was to ascertain the degree to which sites were already in compliance with the new FAM provisions and to highlight potential problem areas in which embassies might need additional reminders or further guidance, in order to come into compliance with the FAM.

(b) (6)

CONTEXT

Given the rapid growth of social media worldwide in recent years, especially among young people, embassies are increasingly using social media as an important public diplomacy tool. From the beginning of her time in office, Secretary Clinton has voiced support for the use of social media¹ to communicate with people around the world. A May 2010 survey by the Office of eDiplomacy found that over half the U.S. missions had Facebook accounts, and a quarter had Twitter accounts.

The Department provided initial guidance through the Office of International Information Programs' (IIP) guidelines² (November 2008) and in 09 State 16064 (February 2009), Department Notice 2009-03-041, "Social Media and the Conduct of Diplomacy." It also established the Social Media Hub as a forum for exchanging ideas and best practices, and the Foreign Service Institute inaugurated courses on social media. As the effort and resources devoted to social media grew, so did the need for formal rules and guidelines, and a special, 30-member working group developed a new subchapter, 5 FAM 790, issued in June 2010. Work is underway on an addition to the *Foreign Affairs Handbook*.

¹ See Secretary Clinton's "21st Century Statecraft" video, posted on Facebook.

² See Internet Steering Committee's "Updated Social Media Guidance."

INSPECTION FINDINGS

In reports on social media at 22 missions in 2009-10, OIG inspectors found that the use of social media is extensive, but labor-intensive. Many embassies required additional staff or had to reprogram an existing position in order to use social media in an active way—for example, to generate original content for the social media site, update it daily, and respond to users. Those who primarily relied on Web site content for their social media sites generally cited lack of sufficient staff as an impediment to creating fresh content. At a number of embassies, American and local staff said they needed more training to use social media effectively. Depending on the country, a more active use of social media would require more content in the local language, which would greatly increase the need for translation resources. Public affairs sections generally took primary responsibility for mission social media sites and sometimes found it difficult to get other sections involved—a necessity for serious discussion of consular or policy issues.

Embassies' primary goal in establishing social media sites is to reach a younger audience. Those who succeeded in attracting a large and interactive audience had put a concerted effort into it and promoted it actively. However, not all embassies succeeded in building a large and interactive audience.

Social media have proven useful in a crisis to keep people informed about the situation. Embassy Bangkok, for example, used Facebook and Twitter to keep American citizens and the public at large informed about the volatile security situation and the status of embassy operations during the recent political crisis in Thailand.

With regard to site content, public diplomacy staff members are engaging in a balancing act. They know they are supposed to focus on the MSRP, but they fear that too great an emphasis on serious issues will make the site heavy, boring, and unable to attract an audience. Some have developed lighter, more creative content, reasoning that if their MSRP goal is to reach a younger audience, anything they do to achieve this automatically falls under the MSRP.

Some embassies have had problems with users posting questionable material on their social media sites, such as postings by supporters of a terrorist group and U.S. partisan political screeds. This issue is addressed in a subsequent recommendation. Others were uncertain about how to handle postings that were severely critical of U.S. society or policies. Embassy staff would welcome more discussion and guidance on this issue.

Local staff members generally have primary day-to-day responsibility for the sites. Supervision by Americans varies widely, and some social media sites may not be getting enough supervision from busy officers. Some embassy staff said there is a lack of a clear policy or guidelines about when postings or responses to comments have to be cleared.

RECOMMENDATION 1: The Under Secretary for Public Diplomacy and Public Affairs should encourage embassies to develop post-specific guidelines about clearance requirements for social media site postings and responses to users' comments and questions. (Action: R)

Embassy staff reported that technical support for social media is generally adequate at their mission. However, in many countries, low computer literacy, low Internet penetration, inadequate bandwidth for video, and local government blockages of social media Web sites limit the effectiveness of social media outreach. In view of local conditions, some embassies have avoided putting a lot of resources into social media. Others have gone ahead with it anyway, either because they think it is what Washington expects, or because they believe that the limited numbers of people they do reach still represent a key audience: educated youth.

Embassies' evaluation of their social media effectiveness was mostly limited to the number of fans or followers of their social media sites and the amount of interaction. As a measurement tool, the amount of interactivity on a site is a good indication of engagement. Facebook provides a useful tool, Facebook Insights, to assess in more detail the interactions with fans, and the popularity of various elements within a site. However, if the goal is to change attitudes, then additional measuring tools are needed. The Office of Policy, Planning and Resources of the Office of the Under Secretary for Public Diplomacy and Public Affairs is sponsoring a study (now in its initial stage) to measure the Department's public diplomacy social media efforts and assess attitudinal and behavioral changes.

SOCIAL MEDIA SITE REVIEW FINDINGS

In view of the new regulations in 5 FAM 790, OIG staff examined the Facebook sites of the missions in the FY 2010 and FY 2011 inspection cycles. This review focused on provisions of the FAM that can be evaluated by looking at the site itself, as well as through asking general questions about content and interactivity. Of the 57 missions in the survey, 42 had active public diplomacy Facebook sites. The other missions had no Facebook sites, or their sites were brand new, private, strictly ambassadorial, unavailable at the time of the review, or focused on consular or other specific issues.

The numbers of fans of embassy Facebook pages surveyed varied from a few hundred to nearly 150,000. The amount of interactivity with fans varied from one or two “likes” on some postings to hundreds of comments. Discussions of MSRP topics in any depth were rare, although discussions of American cultural topics were more common. Interestingly, one mission’s Facebook page drew frequent comments from the government of the country in which it was located, creating a sort of public dialogue. About a quarter of the missions updated their Facebook page daily, half updated it every few days, and about a quarter updated it less than once a week. More than half of the sites were exclusively in English, while about 10 percent were exclusively in the local language. The others were a mixture; often the embassy posted in English, and users posted in both English and the local language.

Some portions of 5 FAM 790, the new social media chapter, codified existing guidance. For example, 5 FAM 793.1 d. states: “All Department social media sites and applications must be registered in the Information Technology Assets Baseline (ITAB).” Previous guidance from IIP issued in November 2008 and posted on the Social Media Hub said that social media sites should be entered into ITAB. Among the 42 Facebook sites examined by the OIG team, only six were registered in the ITAB.

RECOMMENDATION 2: The Under Secretary for Public Diplomacy and Public Affairs, in coordination with the Under Secretary for Management, should remind embassies of the requirement to register all social media sites in the Information Technology Assets Baseline. (Action: R, in coordination with M)

Similarly, 5 FAM 793.4 b. states: “Official Department social media sites must include a Terms of Use statement that explains responsibilities of site administrators and site users, rules of behavior, privacy policies, and other terms.... Site administrators must post the Terms of Use before opening the site to the public.” The November 2008 IIP guidance said that a Terms of Use statement “must be posted prominently on the homepage of your social media site.” Of the 42 Facebook sites, only eight included a Terms of Use statement.

RECOMMENDATION 3: The Under Secretary for Public Diplomacy and Public Affairs should remind embassies about the requirement to include a Terms of Use statement on their social media sites. (Action: R)

All of the Facebook pages that OIG reviewed were clearly identified as official sites, but none of them had a “dot-gov” name, as 5 FAM 793.3 b. requires “to the fullest extent possible.” However, “Facebook.com” is standard for the initial part of a Facebook site name. In addition, the initial Facebook naming guidance issued by the Department’s Internet Steering Committee in July 2009 did not specify “dot-gov.” As examples of the proper naming convention it cited “www.facebook.com/italy.usembassy” and “www.facebook.com/surabaya.usconsulate.” Because of the large number of fans that successful Facebook sites have attracted, the OIG team believes it would be counterproductive to insist on name changes for existing pages that are clearly marked as official sites.

On the issue of accessibility for the disabled, 5 FAM 794 a. (7) (b) states: “Content posted by Department personnel on third-party social media sites should be Section 508 compliant if possible. As appropriate, the disclaimer for a Department page on a commercial social media site must explain that content on the site may not be compliant with Section 508, as the Department cannot control technical aspects of a social media site it does not own.” While some embassies made a serious effort to be Section 508 compliant, the majority of the mission Facebook sites the OIG team examined were not fully compliant. They included photos and graphics without explanations and videos without captions, and they did not include disclaimers.

RECOMMENDATION 4: The Bureau of Information Resource Management should provide additional guidance on Section 508 compliance, taking into account the special features and limitations of social media sites. (Action: IRM)

In its section on content, 5 FAM 794 a. (6) (a) says there should be “[n]o advertising or solicitation of any kind.” On several of the sites, fans had posted commercial material such as ads, hotel recommendations, and links to company Web sites.

RECOMMENDATION 5: The Under Secretary for Public Diplomacy and Public Affairs should provide advice on how to handle comments and postings from users of U.S. missions’ social media sites who include links to businesses and private organizations or who post questionable content. (Action: R)

On the issue of links, 5 FAM 794 a. (6) (a) states: “Personnel may post links in limited circumstances, but only for informational, not promotional, purposes. When non-Federal links are provided, the social media site must include the following information: The links contained herein are for informational purposes only and do not necessarily reflect the views or endorsement of the U.S. Government or the U.S. Department of State.” About a third of the sites the OIG team reviewed featured links to non-U.S. Government organizations, or to events such as musical groups, arts festivals, private study abroad programs, and nongovernmental organizations. Some private organizations were public diplomacy program partners, while others did not appear to be. Some of these non-U.S. Government sites were listed as “Favorite Pages.” In these cases, the difference between “informational” and “promotional” was hard to discern. Few sites had disclaimers.

RECOMMENDATION 6: The Under Secretary for Public Diplomacy and Public Affairs should provide guidance to embassies about listing non-U.S. Government social media and Web sites as “Favorites” in order to avoid crossing the line between “informational” and “promotional,” and should remind embassies about the need for disclaimers. (Action: R)

According to 5 FAM 794 a. (2) (b), information posted by Department personnel must “not promote a personal business or political point of view.” The sites generally stayed away from politics, though one embassy listed as a “Favorite Page” a link to “Students for Barack Obama,” the official student wing of the Obama for America campaign.

RECOMMENDATION 7: The Under Secretary for Public Diplomacy and Public Affairs should clarify the rules about links to political groups and the handling of user-generated content of a political nature. (Action: R)

There is nothing to prevent Americans from posting comments and questions on embassy social media sites, and 5 FAM 794 a. (6) (b) notes that, “[d]ue to the open and global nature of social media sites, Department-generated Public Diplomacy content must be carefully reviewed to avoid violations of the United States Information and Educational Exchange Act of 1948, as amended (Smith-Mundt).” About 10 percent of the embassy Facebook pages examined had a significant number of postings by Americans, and many more had some postings. However, except for those sites that focus on consular issues, the sites did not deliberately aim any significant amount of content at Americans.

OIG staff did not look at the issue of whether and how embassies are archiving social media records, but this is probably an area in which embassies will need more concrete guidance, in order to comply with the complexities of 5 FAM 794 a. (8) and (9). Further guidance may also be needed on the question of when the Privacy Act (as noted in 5 FAM 794 a. (5) (b) comes into play, when archiving records that include users’ comments. The OIG team made informal recommendations on these issues

OTHER ISSUES

Two of the Facebook pages that OIG reviewed did not provide a link to the embassy Web site, and seven embassy Web sites provided no link to the Facebook page. In addition to public affairs sections, other embassy sections and agencies are developing social media sites, but the Facebook pages of different mission sections and agencies (such as the consular section and USAID) did not always link to each other. The new FAM does not address the issue of linkages between and among mission social media sites and Web sites, but common sense would dictate that these sites should link to each other, in order to bolster each other's reach. The OIG team made an informal recommendation on this issue.

Embassies may need more advice on the security implications of social media, such as the issue of giving advance notice of ambassadorial travel in the promotion of public diplomacy programs or the use of photos and identifying information about embassy personnel. OIG made an informal recommendation on this issue.

RECOMMENDATIONS

RECOMMENDATION 1: The Under Secretary for Public Diplomacy and Public Affairs should encourage embassies to develop post-specific guidelines about clearance requirements for social media site postings and responses to users' comments and questions. (Action: R)

RECOMMENDATION 2: The Under Secretary for Public Diplomacy and Public Affairs, in coordination with the Under Secretary for Management, should remind embassies of the requirement to register all social media sites in the Information Technology Assets Baseline. (Action: R, in coordination with M)

RECOMMENDATION 3: The Under Secretary for Public Diplomacy and Public Affairs should remind embassies about the requirement to include a Terms of Use statement on their social media sites. (Action: R)

RECOMMENDATION 4: The Bureau of Information Resource Management should provide additional guidance on Section 508 compliance, taking into account the special features and limitations of social media sites. (Action: IRM)

RECOMMENDATION 5: The Under Secretary for Public Diplomacy and Public Affairs should provide advice on how to handle comments and postings from users of U.S. missions' social media sites who include links to businesses and private organizations or who post questionable content. (Action: R)

RECOMMENDATION 6: The Under Secretary for Public Diplomacy and Public Affairs should provide guidance to embassies about listing non-U.S. Government social media and Web sites as "Favorites" in order to avoid crossing the line between "informational" and "promotional," and should remind embassies about the need for disclaimers. (Action: R)

RECOMMENDATION 7: The Under Secretary for Public Diplomacy and Public Affairs should clarify the rules about links to political groups and the handling of user-generated content of a political nature. (Action: R)

INFORMAL RECOMMENDATIONS

Informal recommendations cover operational matters not requiring action by organizations outside the inspected unit and/or the parent bureau. Informal recommendations will not be subject to the OIG compliance process. However, any subsequent OIG inspection or on-site compliance review will assess the progress in implementing the informal recommendations.

With regard to archiving social media records, embassies need assistance in dealing with the complexity of the regulations, such as the difference between records, nonrecord content, and transitory records; methodology for preserving electronic records; procedures for social media sites that may change daily or even hourly; and Privacy Act regulations.

Informal Recommendation 1: The Office of Policy, Planning and Resources for Public Diplomacy and Public Affairs, in coordination with the Bureau of Administration, should provide clear and concrete instructions on the rules and methods of preserving social media records.

Informal Recommendation 2: The Office of Policy, Planning and Resources for Public Diplomacy and Public Affairs, in coordination with the Bureau of Administration, should provide clear and concrete guidance on Privacy Act regulations as they apply to social media records.

The various social media sites within embassies should link to each other, in order to bolster each other's audiences. Because of the structure of social media, it is possible for an embassy section or agency to start a social media site without other sections being aware of it.

Informal Recommendation 3: The Office of Policy, Planning and Resources for Public Diplomacy and Public Affairs should issue guidance directing embassies to require all the mission's official social media sites to link to one another and to the embassy's Web site.

As social media sites proliferate within embassies, a central repository of knowledge is needed, which logically should be the public affairs section.

Informal Recommendation 4: The Office of Policy, Planning and Resources for Public Diplomacy and Public Affairs should issue guidance directing embassies to inform their public affairs officers that the public affairs section is the central repository of knowledge with regard to official social media.

Embassies need to be aware of the security implications of publicizing embassy activities in advance and publishing photos of embassy personnel on social media sites.

Informal Recommendation 5: The Office of Policy, Planning and Resources for Public Diplomacy and Public Affairs, in coordination with the Bureau of Diplomatic Security, should issue guidance to embassies on how to develop a security policy for social media site content.

ABBREVIATIONS

FAM	<i>Foreign Affairs Manual</i>
IIP	Office of International Information Programs
ITAB	Information Technology Assets Baseline
MSRP	Mission Strategic and Resource Plan
OIG	Office of Inspector General
USAID	U.S. Agency for International Development

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