

# Survey of the Farm Credit Administration's Use of Social Media



**Report #M-12-01**

Farm Credit Administration  
Office of Inspector General

MANAGEMENT ADVISORY REPORT  
September 12, 2012

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# Introduction

Social media provides an additional method of communication

Many Federal agencies use social media to:

- Share information with the public
- Interact with the public by soliciting and responding to comments

Reviewed FCA's strategy regarding its utilization of social media:

- Does FCA have a plan for determining presence on social media networks?
- Does FCA provide guidance to employees on the use of social media?

Since FCA does not have an active social media presence, OIG issued this Management Advisory Report to highlight issues that should be considered.

# Background:

## Administration Priorities

### White House commitment to transparent and open government

- Open Government Directive
  - [The White House, Memorandum for the Heads of Executive Departments and Agencies: Transparency and Open Government, January 21, 2009](#)
  - Implement principles of transparency, participation, and collaboration
  - Keep public informed
  - Provide public with opportunity to contribute ideas and expertise
  - Improve effectiveness thru collaboration
- The Digital Government Strategy
  - [Digital Government: Building a 21<sup>st</sup> Century Platform to Better Serve The American People, May 23, 2012](#)
  - “Enable the American people and an increasingly mobile workforce to access high-quality digital government information and services anywhere, anytime, on any device.”
  - Agencies required to optimize 2 or more customer facing services for mobile use within 12 months
  - Post progress on website by late August 2012

# Background:

## Guidance and Privacy Act Considerations

### Guidance issued by:

- Office of Management and Budget Memoranda:
  - [Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 7, 2010](#)
  - [M-10-22: Guidance for Online Use of Web Measurement and Customization Technologies, June 25, 2010](#)
  - [M-10-23: Guidance for Agency Use of Third-Party Websites and Applications, June 25, 2010](#)
- National Archives and Records Administration (NARA )
  - [NARA, Bulletin 2011-02: Guidance on Managing Records in Web 2.0/Social Media Platforms, October 20, 2010](#)
- General Services Administration (GSA)
  - Terms of Service Agreements
- [HowTo.gov](#)
  - Managed by [GSA's Office of Citizen Services and Innovative Technologies](#) and the [Federal Web Managers Council](#)
- [Chief Information Officers \(CIO\) Council](#)
- [U.S. Office of Special Counsel \(OSC\)](#)

### Privacy Act Considerations

- Should only maintain information that is relevant, necessary and appropriate
- Development and amendment of FCA Privacy Policy as described in OMB Memoranda
- If personal data is collected in agency sponsored social media, policies and privacy must be kept current
- Precautions must be taken with respect to use of third-party websites, external links and applications

# Background:

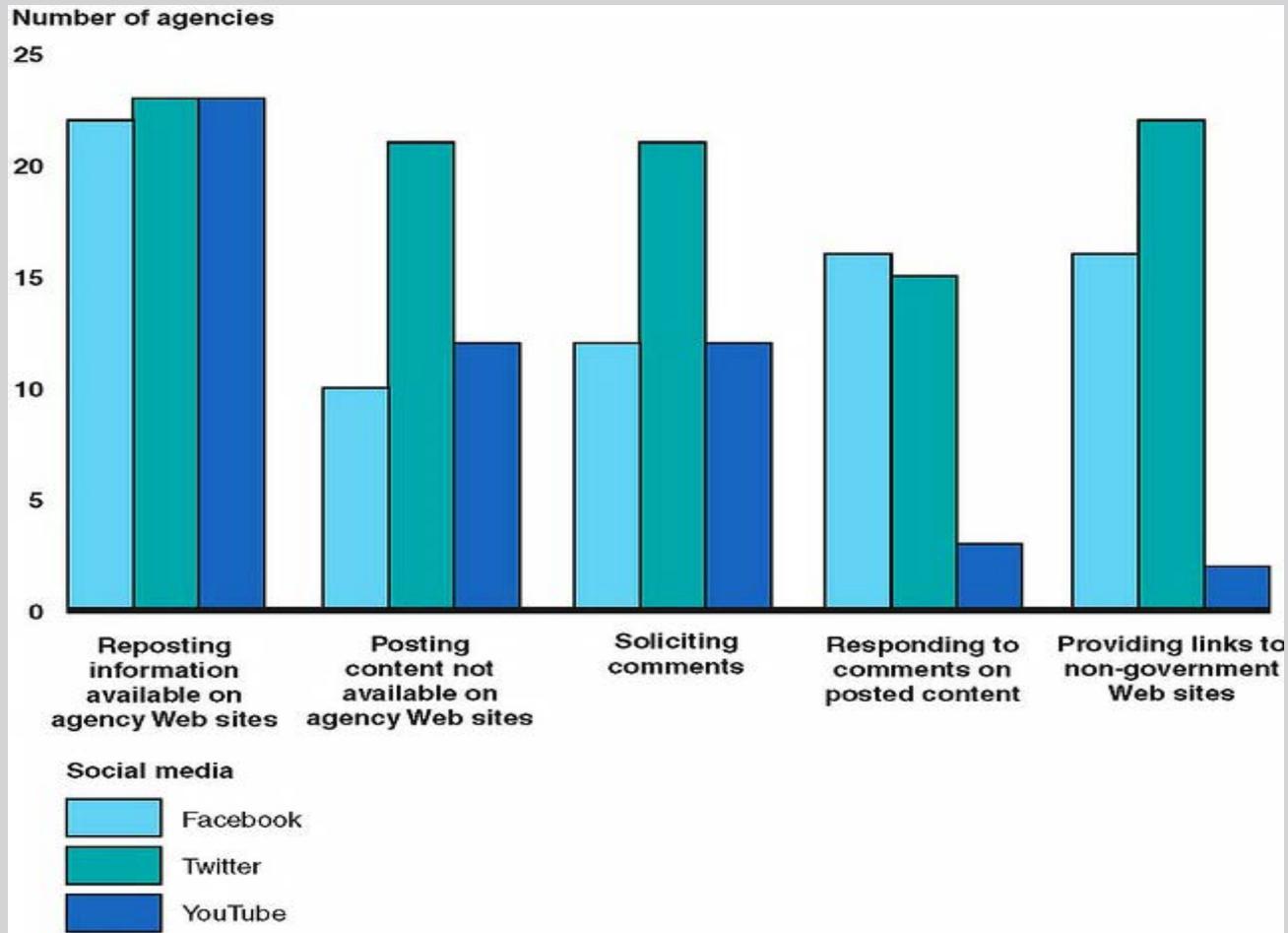
## GAO Report on Social Media

[SOCIAL MEDIA, GAO 11-605, June 2011](#)

[Federal Agencies Need Policies and Procedures for Managing and Protecting Information They Access and Disseminate](#)

- GAO's objectives:
  - Describe how agencies are using social media
  - Determine the extent of policies and procedures for managing and protecting information associated with the use of social media
  
- GAO examined Facebook pages, Twitter accounts, and YouTube channels
  - 23 of 24 major federal agencies had a social media presence

# Background: GAO Report on Social Media



Source: GAO analysis of publicly available data.

Excerpt from GAO-11-605

# Background:

## GAO Report on Social Media

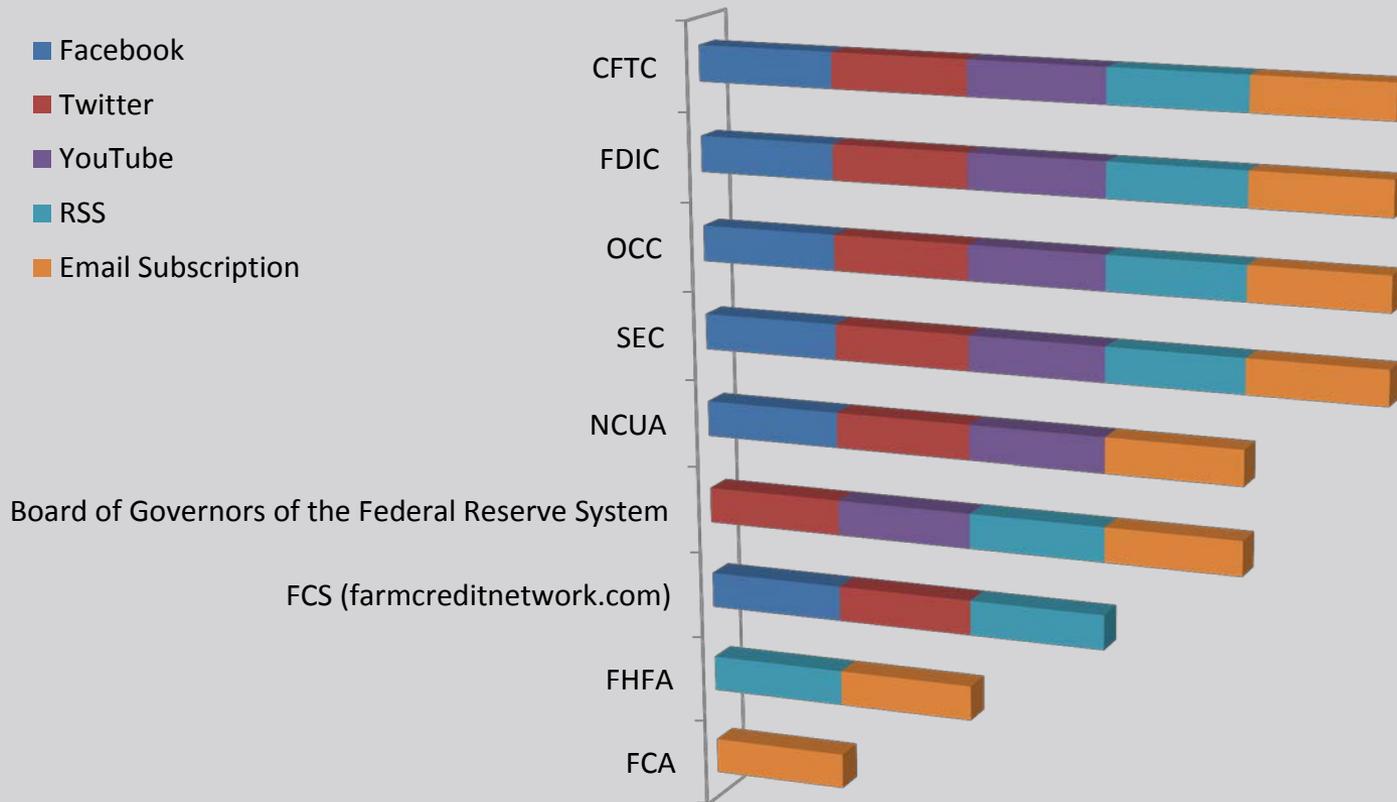
[SOCIAL MEDIA, GAO 11-605, June 2011](#)

[Federal Agencies Need Policies and Procedures for Managing and Protecting Information They Access and Disseminate](#)

- GAO recommended agencies ensure information associated with social media is managed and protected by developing policies and procedures for:
  - Records management
  - Privacy
  - Security

# Background:

## Comparison of Social Media Use by Financial Regulators and the FCS



Currently, FCA has one email subscription provided by the FCA OIG's website. This email subscription enables users to opt to receive an email when new Inspector General reports and other publications are posted.

As of August 2012

# Objectives, Scope, and Methodology

## Objectives:

- Determine the extent that FCA and its employees use social media tools
- Review FCA's governance, risk management, awareness training, and monitoring of social media

Focused on major public social networking tools

## Performed the following steps:

- Reviewed the Administration's priorities related to Open Government
- Identified and reviewed related guidance
- Reviewed Agency policies and procedures
- Conducted interviews with the CIO, Director of Office of Congressional and Public Affairs (OCPA), staff from OCPA, Office of General Counsel, and Office of Management Services
- Interviewed officials at GSA and Department of Health and Human Services OIG
- Compared the use of social media to other financial regulators and the FCS
- Searched the major public social media channels to determine the extent of FCA's presence
- Surveyed employees to determine the extent of their use of social media

Performed from May 2012 through August 2012

Observations shared with key communications and information technology personnel

# Observations

## FCA presence on Social Media

- Governance and Risk Management
- Monitoring

## Employee use of Social Media

- Awareness and Training

# Governance and Risk Management: Policies and Procedures

## FCA's policies and procedures related to social media

- PPM 201 Information Release Policy
  - Release and distribution of public information
  
- PPM 202 FCA Publications and World Wide Web Homepage Policy
  - OCPA responsible for approving content on the Agency's Homepage
  
- PPM 903 Records Management
  - Recently revised to include section on social media
  - Alerts staff that records management needs to be considered if FCA pursues social media

# Governance and Risk Management

Workgroup formed to consider whether FCA should adopt social media

## Social Media Workgroup

- Chair, Director, OCPA
- OCPA
- OMS
- OGC
- ORP
- OE

## Briefings on social media

- Information Resources Management Oversight Committee (IRMOC)
- Senior Staff
- Social Media Workgroup

Research report developed by an intern for the Chief Executive Officer

- Social Media, January 13, 2012

# Governance and Risk Management: Risks

## Risks:

- Lack of strategy and plan
- Inappropriate comments made by public
- Inadequate training
- Spear phishing and social engineering
- Hijacked account

## Risks of unofficial presence:

- Inaccurate or misleading content
- Unauthorized disclosure

## Examples of FCA's unofficial presence:

- Facebook not maintained by FCA (example on next slide)
- LinkedIn not maintained by FCA

## Examples of accounts with similar names not representing FCA or a Federal agency:

- Facebook – FCA represents another organization
- Twitter - @ FCA represents an individual not associated with FCA

# Governance and Risk Management: Example of FCA's unofficial presence

Farm Credit Administration | Facebook

facebook

Email or Phone

Password

Keep me logged in

[Forgot your password?](#)

[Sign Up](#)

Facebook helps you connect and share with the people in your life.



[Info \(0\)](#)

[Wikipedia \(0\)](#)

20

like this

## Farm Credit Administration

[Like](#)

[Create a Page](#)



Organization

### Description

From Wikipedia, the free encyclopedia

The **Farm Credit Administration** is an independent agency of the Executive Branch of the United States Government. It regulates and examines the banks, associations, and related entities of the Farm Credit System, a network of borrower-owned financial institutions that provide credit to farmers, ranchers, and agricultural and rural utility cooperatives. It derives its authority from the Farm Credit Act of 1971. The FCA is headquartered in McLean, Virginia, near Washington, DC. The Farm Credit Administration was established by Executive Order 6084.

The Farm Credit Act of 1933 provides for organizations within the Farm Credit Administration. The Farm Credit Act of 1933 was part of President Franklin D. Roosevelt's New Deal, to help farmers refinance mortgages over a longer time at below-market interest rates at regional and national banks. This helped farmers recover from the Dustbowl. The Emergency Farm Mortgage Act loaned funds to farmers in danger of losing their properties. The campaign refinanced 20% of farmer's mortgages.

An Executive order by Roosevelt in 1933 placed all existing agricultural credit organizations under the supervision of a new agency, the Farm Credit Administration. The Farm Credit Administration was independent until 1939, when it became part of the U.S. Department of Agriculture, but became an independent agency again under the Farm Credit Act of 1953. This Act created a Federal Farm Credit Board with 13 members (one from each of the 12 agricultural districts and one appointed by the Secretary of Agriculture) to develop policy for the Farm Credit Administration.

### Source

Description above from the Wikipedia article Farm Credit Administration, licensed under CC-BY-SA full list of contributors [here](#). Community Pages are not affiliated with, or endorsed by, anyone associated with the topic.

### Want to like this page?

To interact with Farm Credit Administration you need to sign up for Facebook first.

[Sign Up](#)

It's free and anyone can join. Already a member? [Log in](#).

# Governance and Risk Management: OIG Suggestions

1. Develop a social media strategy and plan to define what type of role FCA will have in social media networks.
2. The workgroup should become active in developing and implementing a social media strategy and plan for the Agency.
3. Regardless of whether FCA will have a presence on social media, FCA should reserve accounts from each of the major social media channels for potential future use. In addition,
  - Consider reserving home pages on new social media channels before FCA's identifier is taken, and
  - Use a consistent identifier to make it easy for the public to identify official FCA accounts.
4. Policies and procedures should be revisited if FCA plans to adopt a social media presence.

# Should FCA adopt social media: Employee reactions

Employee comments for how social media could be used at FCA:

Some employees think FCA should not have an active presence on social media networks

Other employees think social media could be used for:

- “recruiting”
- “employee alerts and information”
- “inform the public regarding pending regulatory proposals where we are seeking public comments”
- “input from the public regarding the need for changes to regulatory or policy guidance”
- “survey the public regarding mission-related activities of the System”
- “engage the community more directly and increase the Agency’s exposure”

# Should FCA adopt social media: Email subscriptions or RSS feeds

## Email subscription or RSS\* feeds

- FCA audience requested
- Provides public with a simple way to stay informed of new content posted on FCA's website
- OMS and OCPA working on email subscription

\*RSS – Really Simple Syndication allows users to subscribe to updates from multiple websites and receive in one place (email or desktop)

# Monitoring

FCA does not monitor social media networks to learn what is said about FCA

Some FCA examiners monitor the FCS

17 employees use social media to monitor activity related to the FCS or institutions they examine and/or supervise

- 6 daily
- 3 weekly
- 1 monthly
- 7 ad hoc

Most common tools identified as most useful for monitoring activity related to the FCS or the institutions examined and/or supervised:

- Facebook
- Google
- Twitter
- RSS feeds
- Blogs

Employee suggestions for monitoring the Farm Credit System:

- “searches on how the system is being discussed in social media”
- Google search of blogs to identify possible issues at an institution  
(e.g. employee posting inappropriate or confidential information, borrower complaints)

# Monitoring: OIG Suggestion

5. FCA should consistently monitor social media networks
  - Identify social networks to monitor
  - Identify key words
  - Identify tools used for monitoring
  - Setup automatic alerts
  - Develop plans on when/how/who to react to negative situations

# Awareness and Training: Policies & Guidance related to Employee use of Social Media

## PPM 902B

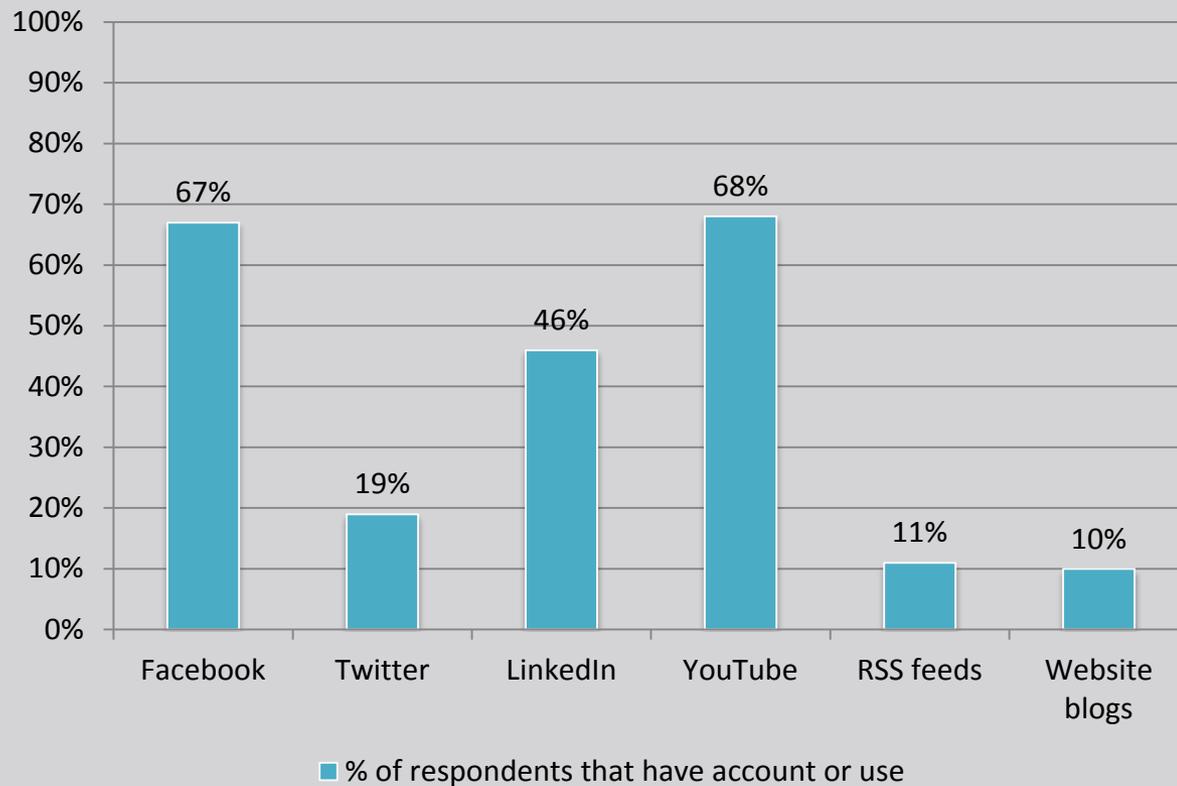
- FCA Internet, E-Mail, and Network Acceptable Use Policy
- Provides limited personal use, unless it:
  - Interferes with official duties
  - Poses a security risk
  - Consumes excessive resources, or
  - Creates impression that personal views represent official position of FCA

## Hatch Act

- OSC guidance addresses social media related to political activity
- Training provided by FCA's ethics officials

# Awareness and Training: Survey of FCA and FCSIC Employees

Approximately 82% of respondents indicate they use social media

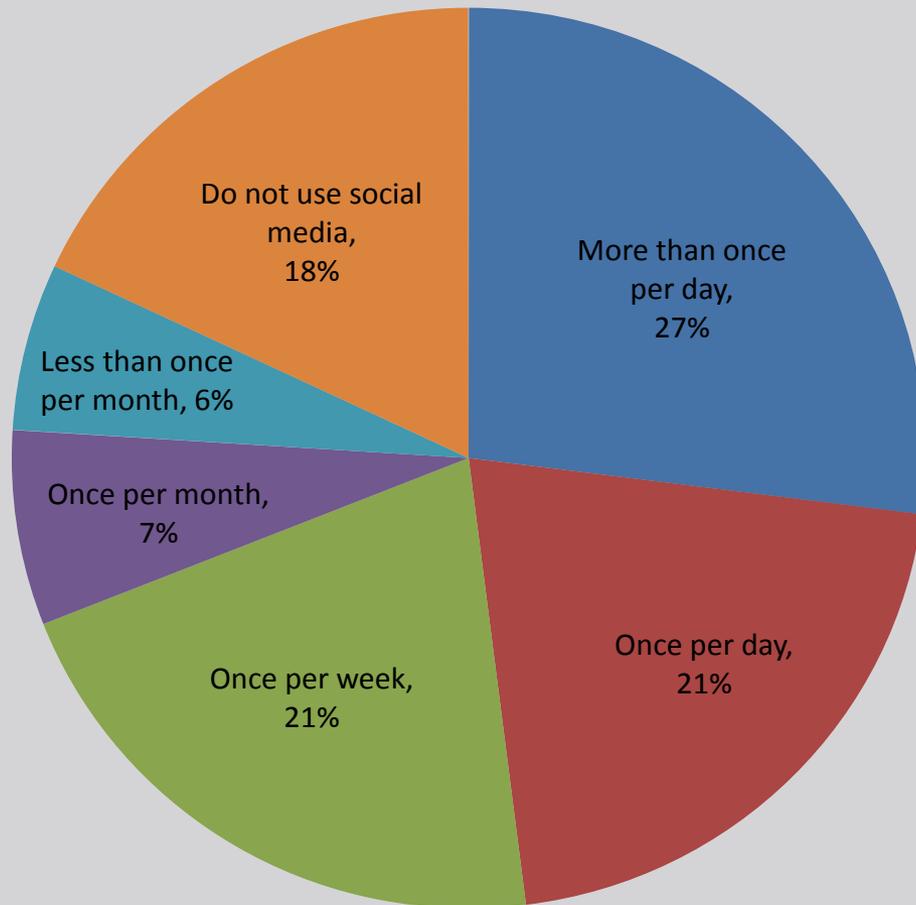


Survey Results – Based on 57% response rate of all FCA and FCSIC employees

Report #M-12-01 Survey of Social Media Use at FCA

# Awareness and Training: Survey of FCA and FCSIC Employees

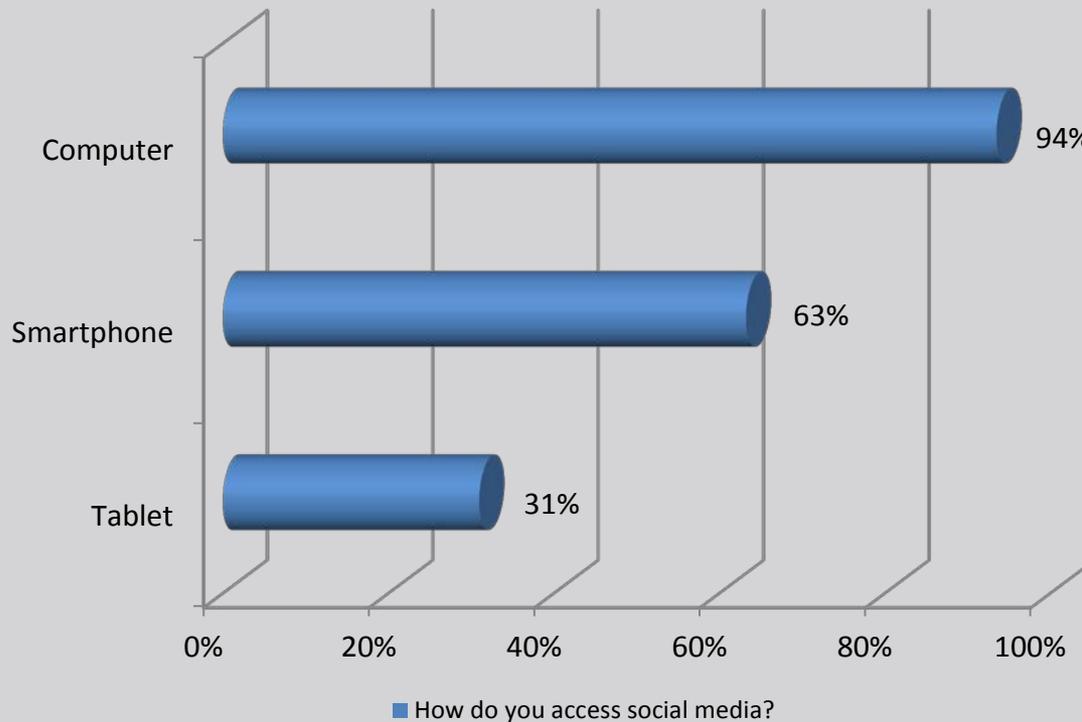
84% of respondents that use social media access it at least once a week



Survey Results – Based on 57% response rate of all FCA and FCSIC employees

# Awareness and Training: Survey of FCA and FCSIC Employees

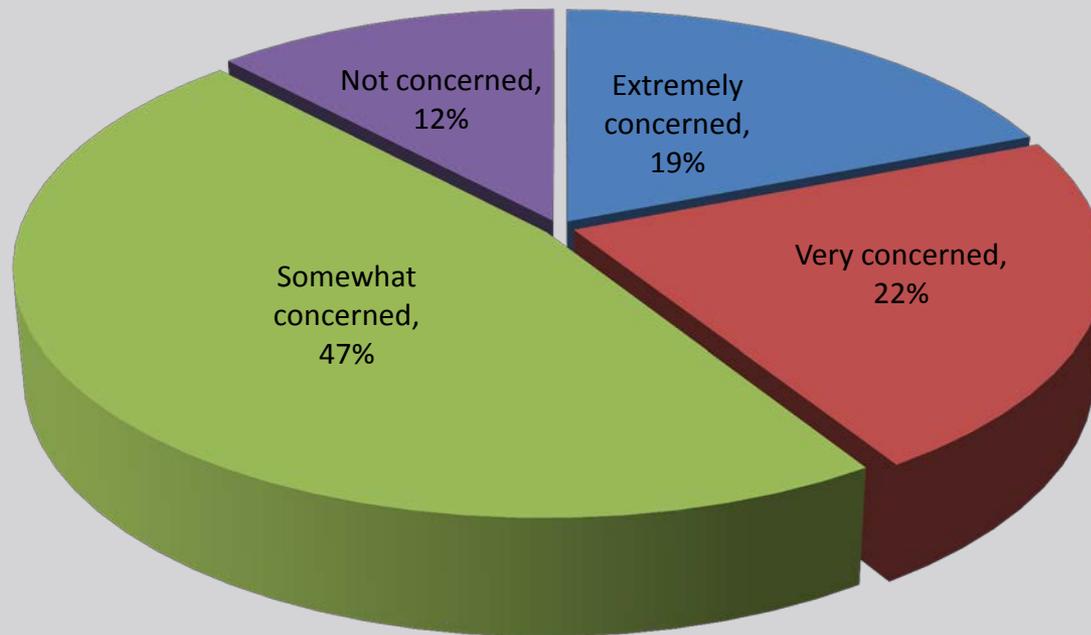
## Tools used to access social media



Survey Results – Based on 57% response rate of all FCA and FCSIC employees

# Awareness and Training: Survey of FCA and FCSIC Employees

**Do you have concerns about protecting your identity on social media networks?**



Most employees have concerns about protecting their identity on social media networks.

But, only 39% of respondents monitor their own identity.

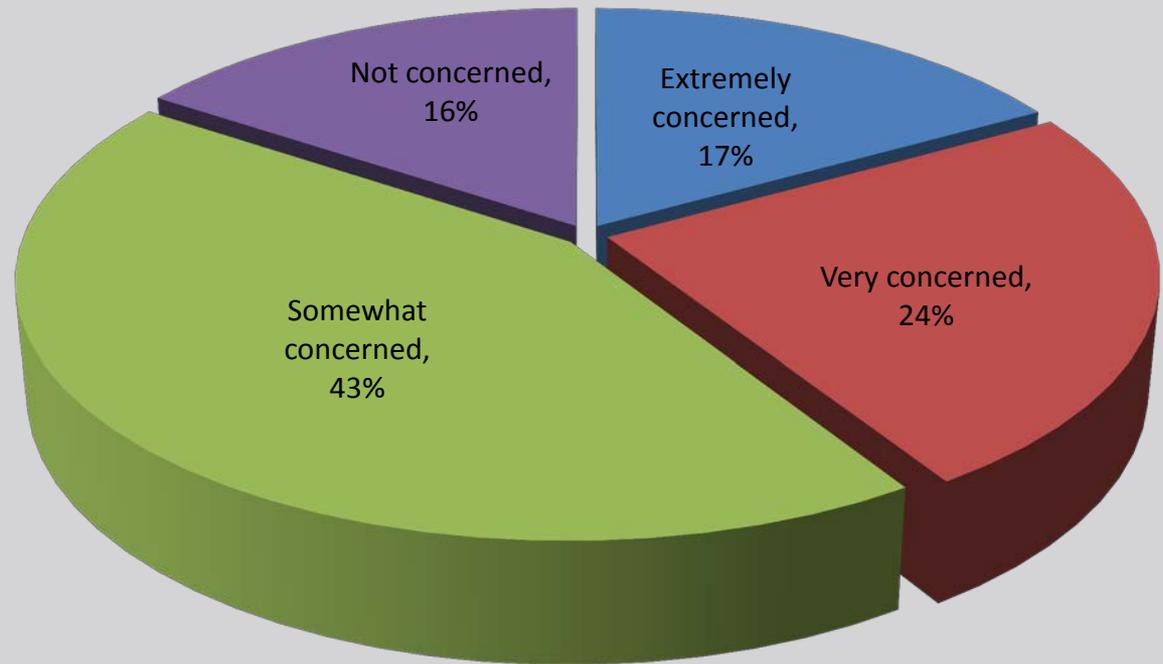
Of those that monitor their identity, most monitor on an ad hoc basis:

- Daily - 5%
- Weekly - 7%
- Monthly - 14%
- Ad hoc - 74%

Survey Results – Based on 57% response rate of all FCA and FCSIC employees

# Awareness and Training: Survey of FCA and FCSIC Employees

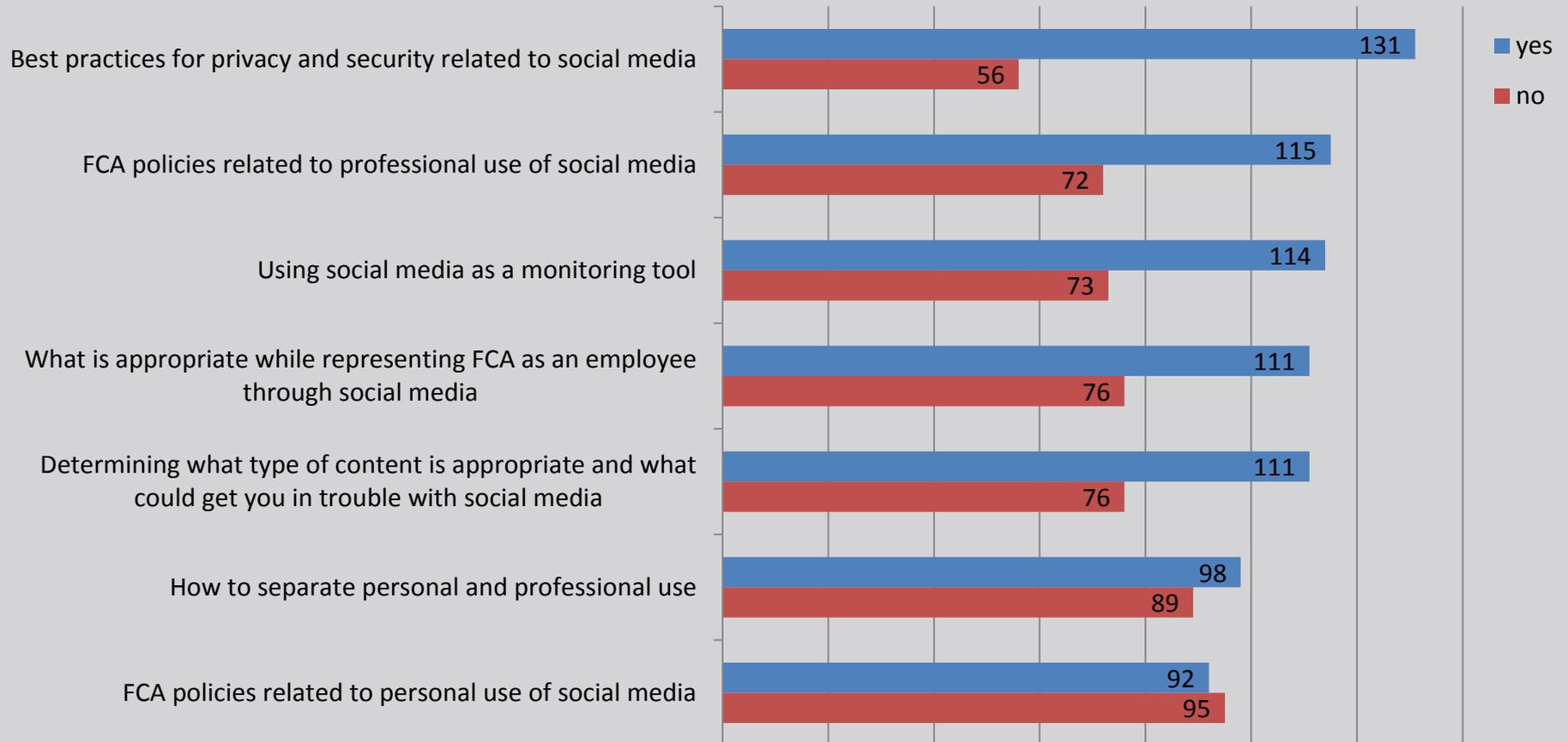
**Do you have concerns regarding the security of your social media accounts?**



Most employees have concerns regarding security of their social media accounts

Survey Results – Based on 57% response rate of all FCA and FCSIC employees

# Awareness and Training: Survey of FCA and FCSIC Employees



Survey Results – Based on 57% response rate of all FCA and FCSIC employees

# Awareness and Training: OIG Suggestion

6. FCA should incorporate social media into its annual security awareness training program.  
Suggested topics to cover:
  - FCA policies on professional and personal use
  - FCA policy on employees representing FCA
  - Disclosure of employer and position
  - Distinguishing FCA accounts from personal accounts
  - Appropriate vs. inappropriate content
  - Best practices for securing your account and maintaining privacy
  - Using social media as a monitoring tool
  - Self-marketing on LinkedIn
  - Recommendations via social media
  - Use of social media through Agency devices

# Matters for Board Consideration: Governance

1. What kind of presence does the Board want FCA to have on social media?
2. What is FCA's purpose(s) for using social media?
3. Should the FCA Board develop a Policy on the Agency's utilization of social media?
4. What are the major milestones and timeframes for implementation?