Survey of the Farm Credit Administration’s Use of Social Media

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

## Introduction

## Background
- Administration Priorities
- Guidance and Privacy Act Considerations
- U.S. Government Accountability Office (GAO) Report on Social Media
- Comparison of Social Media by Financial Regulators and the Farm Credit System (FCS)

## Objectives, Scope, and Methodology

## Observations
- **FCA Presence on Social Media**
  - Governance and Risk Management
  - Should FCA adopt Social Media
  - Monitoring
- **Employee Use of Social Media**
  - Awareness and Training
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
  - 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
  - “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
- National Archives and Records Administration (NARA )
- 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

Number of agencies

Reposting information available on agency Web sites
Posting content not available on agency Web sites
Soliciting comments
Responding to comments on posted content
Providing links to non-government Web sites

Social media
Facebook
Twitter
YouTube

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
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

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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
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

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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

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, D.C.

The Farm Credit Administration was established by Executive Order 6094.

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 Dust Bowl. The Emergency Farm Mortgage Act loaned funds to farmers in danger of losing their properties. The campaign refinanced 20% of farmers’ 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.
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.
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)
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)
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
Approximately 82% of respondents indicate they use social media.

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

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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

More than once per day, 27%
Once per day, 21%
Once per week, 21%
Less than once per month, 6%
Once per month, 7%
Do not use social media, 18%
Less than once per month, 6%
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

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

- Not concerned, 16%
- Somewhat concerned, 43%
- Very concerned, 24%
- Extremely concerned, 17%

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

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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?