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UNITED STATES OFFICE OF GOVERNMENT ETHICS



April 9, 2015
LA-15-03

LEGAL ADVISORY

TO: Designated Agency Ethics Officials

FROM: David J. Apol
General Counsel

SUBJECT: The Standards of Conduct as Applied to Personal Social Media Use

Use of social media has become prevalent among Federal executive branch employees and agencies. The U.S. Office of Government Ethics (OGE) is aware that agency ethics officials have an interest in understanding how the Standards of Ethical Conduct for Executive Branch Employees (Standards of Conduct), 5 C.F.R. part 2635, apply to the use of social media. This interest is reflected in the increased volume of questions that OGE receives from various agencies seeking advice in this area.

As an initial matter, the Standards of Conduct do not prohibit executive branch employees from establishing and maintaining personal social media accounts. As in any other context, however, employees must ensure that their social media activities comply with the Standards of Conduct and other applicable laws, including agency supplemental regulations and agency-specific policies. To assist employees and agency ethics officials in this endeavor, OGE is providing the following guidance regarding issues that agency ethics official have frequently raised concerning employees' obligations under the Standards of Conduct when using social media.¹

1. Use of Government Time and Property

When employees are on-duty, the Standards of Conduct require that they use official time in an honest effort to perform official duties. *See* 5 C.F.R. § 2635.705. As a general matter, this requirement limits the extent to which employees may access and use their personal social media

¹ Employees should remain aware that other statutes and regulations outside of OGE's purview may further limit their use of social media. For example, the Hatch Act, 5 U.S.C. § 7321, *et seq.*, limits the extent to which executive branch employees may use social media to engage in certain political activities. *See* U.S. Office of Special Counsel, *Frequently Asked Questions Regarding the Hatch Act and Social Media*, April 4, 2012, available at: <https://ethics.od.nih.gov/topics/Hatch-Act-and-Social-Media-2012.pdf>

accounts while on duty. The Standards of Conduct also require employees to protect and conserve government property and to use government property only to perform official duties, unless they are authorized to use government property for other purposes. *See* 5 C.F.R. § 2635.704. For example, under the Standards of Conduct, a supervisor may not order, or even ask, a subordinate to work on the supervisor's personal social media account. Coercing or inducing a subordinate to maintain the supervisor's personal account would amount to a misuse of position and, if done on official time, a misuse of official time. The same would be true if the supervisor were to have a subordinate create content for the supervisor's personal account, even if the subordinate were not involved in uploading the content to that account. 5 C.F.R. §§ 2635.702(a), 2635.705(b).

Where agencies have established policies permitting limited personal use of government resources by their employees, those policies control what constitutes an authorized use of government resources. *See, e.g.* OGE Informal Advisory Opinion 97 x 3. In some cases, such "limited use" policies may authorize employees to access their personal social media accounts while on duty.

2. Reference to Government Title or Position & Appearance of Official Sanction

A question that frequently arises is the extent to which employees may reference their official titles on their personal social media accounts. In general, the Standards of Conduct prohibit employees from using their official titles, positions, or any authority associated with their public offices for private gain. 5 C.F.R. § 2635.702. The Standards of Conduct also require that employees avoid using their titles or positions in any manner that would create an appearance that the Government sanctions or endorses their activities or those of another. 5 C.F.R. §§ 2635.702; 2635.807(b).²

Employees' use of personal social media ordinarily will not create the impermissible appearance of governmental sanction or endorsement which would be prohibited under § 2635.702(b). An employee does not, for example, create the appearance of government sanction merely by identifying his or her official title or position in an area of the personal social media account designated for biographical information. *See e.g.* OGE Legal Advisory LA-14-08; OGE Informal Advisory Opinion 10 x 1.

In evaluating whether a reference to an employee's official title or position on social media violates the Standards of Conduct, the agency ethics official must consider the totality of the circumstances to determine whether a reasonable person with knowledge of the relevant facts would conclude that the government sanctions or endorses the communication. *See, e.g.* 5 C.F.R. §§ 2635.702(b); 2635.807(b); OGE Legal Advisory LA-14-08; OGE Informal Advisory Opinion 10 x 1. Relevant factors for agency ethics officials to consider in making the determination include:

² Agency supplemental regulations may place further limitations on employees' use of title or position, or may impose additional requirements such as mandating the use of a disclaimer.

- Whether the employee states that he or she is acting on behalf of the government;
- Whether the employee refers to his or her connection to the government as support for the employee's statements;
- Whether the employee prominently features his or her agency's name, seal, uniform or similar items on the employee's social media account or in connection with specific social media activities;
- Whether the employee refers to his or her government employment, title, or position in areas other than those designated for biographical information;
- Whether the employee holds a highly visible position in the Government, such as a senior or political position, or is authorized to speak for the Government as part of the employee's official duties;
- Whether other circumstances would lead a reasonable person to conclude that the government sanctions or endorses the employees' social media activities; or
- Whether other circumstances would lead a reasonable person to conclude that the government does not sanction or endorse the employees' social media activities.

Ordinarily, an employee is not required to post a disclaimer disavowing government sanction or endorsement on the employee's personal social media account. Where confusion or doubt is likely to arise regarding the personal nature of social media activities, employees are encouraged to include a disclaimer clarifying that their social media communications reflect only their personal views and do not necessarily represent the views of their agency or the United States. A clear and conspicuous disclaimer will usually be sufficient to dispel any confusion that arises. *See* OGE Legal Advisory LA-14-08.

3. Recommending and Endorsing Others on Social Media

Social media networks, particularly those focused on job seeking, sometimes allow users to recommend or endorse the skills of other users. The Standards of Conduct permit employees to use social media to make such recommendations or endorsements in their personal capacity. It is not a misuse of position for employees to provide such endorsements merely because they have provided their official titles or positions in areas of their personal social media accounts that are designated for biographical information.

OGE is aware that at least one social media service automatically adds a user's name, title, and employer to any recommendation that the user posts regarding a job seeker. In any such case where title and employer name are added automatically, OGE does not consider a

recommendation to constitute a misuse of position because the recommendation is readily understood by users of the social media service to be personal, rather than official, in nature. An employee should not, however, affirmatively choose to include a reference to the employee's title, position, or employer in a recommendation, except where 5 C.F.R. § 2635.702(b) expressly permits such references.

4. Seeking Employment Through Social Media

The basic provisions governing seeking employment are set out in subpart F of the Standards of Conduct. For these purposes "seeking employment" includes not only the kinds of bilateral employment negotiations that would implicate 18 U.S.C. § 208, but also certain unilateral expressions of interest in employment by the employee. Specifically, in addition to actual negotiations, as described in section 2635.603(b)(1)(i), seeking employment also includes unsolicited communications by the employee regarding possible employment, as described in section 2635.603(b)(1)(ii), and any response by the employee, other than rejection, to an unsolicited overture from a prospective employer, as described in section 2635.603(b)(1)(iii). *See* OGE Informal Advisory Opinion 04 x 13.

Employees who are seeking or negotiating for employment through social media must comply with the applicable disqualification requirements of 5 C.F.R. § 2635.601, *et seq.*, 18 U.S.C. § 208, and any additional requirements found in agency supplemental regulations. Public financial disclosure filers who are negotiating or have an arrangement concerning future employment or compensation also must comply with the notification requirements found in section 17 of the Stop Trading on Congressional Knowledge Act of 2012. *See* 5 U.S.C. app. § 101, note; OGE Legal Advisories LA-13-06 and LA-12-01.

An employee is not considered to be seeking employment with any person or organization merely because the employee has posted a resume or similar summary of professional experience to the employee's personal social media account. Likewise, an employee is not considered to be seeking employment merely because a person or organization has viewed the employee's resume on that social media account or has sent an unsolicited message, including one containing a job offer, to the employee. An employee who receives an unsolicited message or job offer is seeking employment with the sender only if the employee responds to the message and the employee's response is anything other than a rejection. 5 C.F.R. § 2635.603.

An employee will be considered to be seeking employment with a person or an organization if the employee contacts that person or organization concerning future employment. In the age of social media, there are a multitude of ways that an employee might contact a prospective employer and thereby trigger the seeking employment rules. For example, an employee would trigger the seeking employment rules by sending a message directly to the organization, uploading a resume or application to the prospective employer's social media account for recruiting employees, or otherwise targeting the organization through a social media communication.

5. Disclosing Nonpublic Information

The Standards of Conduct prohibit employees from disclosing nonpublic information to further their private interests or the private interests of others. *See* 5 C.F.R. § 2635.703. This prohibition applies without regard to the medium used for the unauthorized disclosure. In addition to the Standards of Conduct, other statutes and regulations prohibit the disclosure of specific categories of nonpublic information, such as classified or confidential information. Employees must follow the rules regarding the disclosure of nonpublic information found in the Standards of Conduct and all other applicable rules when using social media. The Standards of Conduct generally do not prevent employees from discussing or sharing government information that is publicly available. Employees may not, however, accept compensation for statements or communications made over social media that relate to their official duties. *See* 5 C.F.R. §§ 2635.807(a); 2635.703.

6. Personal Fundraising

Employees may use personal social media accounts to fundraise for nonprofit charitable organizations in a personal capacity, but they must comply with 5 C.F.R. § 2635.808, the section of the Standards of Conduct that covers fundraising. As a general rule, fundraising solicitations over social media are permissible so long as the employee does not “personally solicit” funds from a subordinate or a known prohibited source. *See* 5 C.F.R. § 2635.808(c)(1).

Fundraising requests over social media are potentially visible to a wide audience of followers and connections. An employee who posts or publishes a general fundraising announcement or request over social media has not “personally solicited” any prohibited source or subordinate merely because the employee is connected with the prohibited source or subordinate through the social media network. The same is true even if the prohibited source or subordinate views, comments on, or responds to the post. However, an employee may not respond to inquiries posted by prohibited sources or subordinates in reference to the fundraising request. Furthermore, an employee may not specifically reference, link to, or otherwise target a subordinate or known prohibited source when fundraising over social media. An employee doing so will be considered to have “personally solicited” that person in violation of 5 C.F.R. § 2635.808(c)(1). *See* OGE Informal Advisory Opinion 93 x 19; OGE Informal Advisory Opinion 93 x 8.

Additionally, employees may not use their official titles, positions, or authority associated with their positions to further fundraising efforts. *See* 5 C.F.R. § 2635.808(c)(2); OGE Informal Advisory Opinion 96 x 2. Employees are not considered to have used their official titles, positions, or authority associated with their positions to further fundraising efforts merely because they have provided this information in areas of their personal social media accounts designated for biographical information.

7. Official Social Media Accounts

Many Federal agencies maintain one or more official social media accounts for use in conducting official business. Subject to applicable legal authorities, each agency determines the

purposes for which its official accounts may be used. *See, e.g.* OGE Informal Advisory Opinions 93 x 6 and 93 x 24. When employees use these official accounts, they must do so in accordance with applicable agency directives, regulations, and policies. *See* 5 C.F.R. § 2635.704(a); OGE Informal Advisory Opinion 97 x 3. Put simply, official accounts are for official purposes.

OGE encourages agencies to adopt policies indicating which employees are authorized to access official accounts and defining the authorized uses for those accounts. Agency officials responsible for social media accounts may wish to visit the General Services Administration's online Federal Social Media Community of Practice and Social Media Registry at <http://www.digitalgov.gov/>.

Additional Information

In light of the ever evolving nature of social media, the foregoing advice is not intended to be comprehensive. OGE expects to issue additional guidance in the future addressing questions outside the scope of this Legal Advisory. Designated Agency Ethics Officials with questions regarding the application of the Standards of Conduct to social media may contact their assigned OGE Desk Officers.

Office of Government Ethics
Privacy Impact Assessment for the
Use of Third-Party Websites and Applications

July 2016
Program Counsel Division

**U.S. Office of Government Ethics
Privacy Impact Assessment (PIA) for the
Use of Third-Party Websites and Applications**

Provide copies of the signed PIA to OGE's Chief Information Security Officer and Privacy Officer.

Name of Project/System: OGE Social Media and Website Analytics Accounts on Third-Party Websites

Office: Program Counsel Division, U.S. Office of Government Ethics

A. CONTACT INFORMATION:

- 1) **Who is the person completing this document?** (Name, title, organization and contact information).

Brandon Steele
Associate Counsel
Legal, External Affairs and Performance Branch
Program Counsel Division
bastele@oge.gov
(202) 482-9209

- 2) **Who is the system owner?** (Name, title, organization and contact information).

Ty Cooper
Chief Information Officer
jtcooper@oge.gov
(202) 482-9226

- 3) **Who is the system manager for this system or application?** (Name, title, organization, and contact information).

Nelson Cabrera, Jr.
Assistant Director, Internal Operations
Internal Operations Division
ncabrera@oge.gov
(202) 482-9233

- 4) **Who is the Chief Information Security Officer who reviewed this document?** (Name, organization, and contact information).

Ty Cooper
Chief Information Officer
jtcooper@oge.gov
(202) 482-9226

- 5) **Who is the Privacy Officer who reviewed this document?** (Name, organization, and contact information).

Diana J. Veilleux
Chief, Legal, External Affairs and Performance Branch
Program Counsel Division
Diana.Veilleux@oge.gov
(202) 482-9203

- 6) **Who is the Reviewing Official?** (According to OMB, this is the agency CIO or other agency head designee, someone other than the official procuring the system or the official who conducts the PIA).

Ty Cooper
Chief Information Officer
jtcooper@oge.gov
(202) 482-9226

B. SYSTEM APPLICATION/GENERAL INFORMATION:

- 1) **Does this system contain any information about individuals?**

No.

- a. **Is this information identifiable to the individual?**

N/A

- b. **Is the information about individual members of the public?**

N/A

- c. **Is the information about employees?**

N/A

2) What is the purpose of the system/application?

OGE maintains social media and website analytics accounts on third-party websites (“third-party accounts”) to promote transparency, raise the visibility of the executive branch ethics program and OGE, and improve the usability of OGE’s website. Raising the visibility of the executive branch ethics program and OGE are critical steps towards building awareness of the systems in place to detect and resolve potential conflicts of interest. Additionally, OGE uses third-party accounts to provide cost-effective online training for ethics officials. This training provides ethics officials with the knowledge and skills needed to carry out the duties of their positions. Lastly, OGE uses third-party accounts to help analyze non-identifiable information about how visitors interact with OGE’s website. This information is vital in continuously improving OGE’s website.

OGE uses its third-party accounts to inform its external audiences about the executive branch ethics program and OGE, to provide ethics education and training for agency ethics officials, and to direct users to OGE’s official website or to contact OGE for more information. Such use will generally not implicate PII outside of voluntary user interaction with OGE. User interactions with OGE may include name, username, email address, photos, images, videos, content of messages or postings, or other personal information provided by the user. OGE may use this information to respond to comments or messages posted on or directed at OGE’s third-party accounts. OGE does not use its third-party social media or website analytics accounts to request, collect, maintain, or record PII.

OGE also uses analytic technology to monitor 1) traffic directed to its website through OGE’s third-party accounts and 2) engagement activities with OGE third-party pages, such as the number of views, clicks on posted links, “likes,” and “retweets,” and the number of “followers,” “friends,” “subscribers,” or similar connections. OGE uses this information to learn about the reach of its external communications by analyzing the number of users who visit OGE’s official website through links OGE posts on its third-party sites and to make its website and third-party accounts more useful to its external audiences. No PII is provided to OGE through these measurement technologies.

3) What legal authority authorizes the purchase or development of this system/application?

5 U.S.C. app. § 402, Authority and Functions, Ethics in Government Act.

C. DATA in the SYSTEM:

1) What categories of individuals are covered in the system?

People interacting with OGE’s website or third-party social media accounts.

2) What are the sources of the information in the system?

In general, the source of information will depend on the third-party application. For most social media applications, the information provided to OGE when a user voluntarily posts to an OGE third-party social media application is limited to the username. Some third-party websites may also collect PII during the registration process. Depending on the user's privacy settings, any member of the public may be able to view a user's name, username, and any other PII the user includes in his or her profile information, comments, or posts. This information, however, is in no way retained or solicited by OGE.

a. Is the source of the information from the individual or is it taken from another source? If not directly from the individual, then what other source?

If a user does interact with an OGE third-party account, the user's name, username, profile information, and the content of the messages or postings (including photos, images, videos, and other personal information provided by the user) may become available to OGE. Interactions include "following," "friending," "subscribing" to or otherwise associating with an OGE third-party account; posting comments, videos, or other content to an OGE page; exchanging messages; or participating in one of the various services, such as a live video chat.

b. What federal agencies provide data for use in the system?

None.

c. What State and local agencies are providing data for use in the system?

None.

d. From what other third party sources will data be collected?

The third-party applications, such as Google Analytics.

e. What information will be collected from the employee and the public?

In general, OGE does not collect data through third-party social media applications. Applications used for improving website performance may capture data, but this data is generic to the usage of the website and does not contain PII.

OGE does not "follow," "friend," "subscribe" to, or take similar actions to connect its account with other user accounts, except for U.S. government entities or certain international governmental organizations, nongovernmental organizations, or state government entities, within the ethics community. Furthermore, OGE does not use its third-party social media or website analytics accounts to request, collect, maintain, or record PII.

3) Accuracy, Timeliness, Reliability, and Completeness

- a. How will data collected from sources other than OGE records be verified for accuracy?**

N/A

- b. How will data be checked for completeness?**

N/A

- c. Is the data current? What steps or procedures are taken to ensure the data is current and not out-of-date?**

N/A

- d. Are the data elements described in detail and documented?**

All OGE third-party accounts are governed by OGE's Policy for Official OGE Social Media Accounts on Third-Party Websites. Additionally, OGE provides a privacy statement, either in full text or through a hyperlink, on the profile page of each of its third-party accounts. OGE periodically reviews the use of its third-party accounts to ensure that such use complies with OGE's policies and all federal privacy, accessibility, information security, records management, and other applicable laws, regulations, and guidance.¹

D. ATTRIBUTES OF THE DATA:

- 1) Is the use of the data both relevant and necessary to the purpose for which the system is being designed?**

N/A. Insofar as social media applications are concerned, OGE does not collect data on individual users. Applications used for improving website performance may capture data, but this data is generic to the usage of the website and does not contain PII.

- 2) Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected, and how will this be maintained and filed?**

No.

¹ Guidance includes, but is not limited to, *Memorandum M-10-23: Guidance for Agency Use of Third-Party Websites and Applications*, Office of Mgmt. & Budget, Exec. Office of the President, June 25, 2010, http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-23.pdf.

3) Will the new data be placed in the individual's record?

N/A

4) Can the system make determinations about employees/the public that would not be possible without the new data?

N/A

5) How will the new data be verified for relevance and accuracy?

N/A

6) If the data is being aggregated, what controls are in place to protect the data from unauthorized access or use?

N/A

7) If data is being aggregated, are the proper controls remaining in place to protect the data and prevent unauthorized access?

N/A

8) How will the data be retrieved? Does a personal identifier retrieve the data?

N/A

9) What kinds of reports can be produced on individuals? What will be the use of these reports? Who will have access to them?

None.

10) What opportunities do individuals have to decline/refuse to provide information (i.e., where providing information is voluntary) or to consent to particular uses of the information (other than required or authorized uses), and how individuals can grant consent.)

OGE does not request, collect, maintain, or record any PII about users made available to OGE through its third-party social media accounts. Content posted on OGE third-party accounts by other users may be retained independently by the third-party website and such retention period is governed by the terms of service agreement of each third-party website.

E. MAINTENANCE AND ADMINISTRATIVE CONTROLS:

- 1) If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?**

N/A

- 2) Is the data in the system covered by existing records disposition authority? If yes, what are the retention periods of data in this system?**

Under the Privacy Act, a system of records is a group of records from which information is retrieved by the name of an individual, or by any number, symbol, or other unique identifier assigned to that individual. OGE does not use its third-party social media or website analytics accounts to request, collect, maintain, or record PII and thus does not create a system of records.

- 3) What are the procedures for disposition of the data at the end of the retention period? How long will the reports produced be kept? Where are the procedures documented?**

N/A

- 4) Is the system using technologies in ways that the OGE has not previously employed (e.g., monitoring software, Smart Cards, Caller-ID)?**

No.

- 5) How does the use of this technology affect public/employee privacy?**

Many of the risks presented by third-party websites depend on how users decide to use these websites.

- 6) Will this system provide the capability to identify, locate, and monitor individuals? If yes, explain.**

No.

- 7) What kinds of information are collected as a function of the monitoring of individuals?**

N/A

- 8) What controls will be used to prevent unauthorized monitoring?**

OGE takes reasonable precautions to protect its third-party accounts and information voluntarily submitted to OGE on a third-party website. OGE restricts access to its

third-party social media and website analytics accounts only to employees who have received management approval to access the account to perform their official duties. Access to OGE third-party accounts is limited to employees who administer those accounts. OGE utilizes best practices for creating secure passwords for its third-party accounts, and all such accounts are clearly identified as official OGE accounts. Additionally, policies governing the creation of an OGE third-party account must be reviewed by the agency's Chief Information Officer, Privacy Officer, and Records Officer to ensure compliance with IT security-policy and procedures, federal privacy laws, and federal records laws.

9) Under which Privacy Act systems of records notice does the system operate? Provide number and name.

Under the Privacy Act, a system of records is a group of records from which information is retrieved by the name of an individual, or by any number, symbol, or other unique identifier assigned to that individual. OGE does not use its third-party social media or website analytics accounts to request, collect, maintain, or record PII and thus, does not create a system of records.

10) If the system is being modified, will the Privacy Act system of records notice require amendment or revision? Explain.

N/A

F. ACCESS TO DATA:

1) Who will have access to the data in the system?

OGE restricts access to its third-party social media and website analytics accounts only to employees who have received management approval to access the account to perform their official duties. Access to OGE third-party accounts is limited to employees who administer those accounts.

2) How is access to the data by a user determined? Are criteria, procedures, controls, and responsibilities regarding access documented?

OGE restricts access to its third-party social media and website analytics accounts only to employees who have received management approval to access the account to perform their official duties. Access to OGE third-party accounts is limited to employees who administer those accounts.

3) Will users have access to all data on the system or will the user's access be restricted? Explain.

OGE restricts access to its third-party social media and website analytics accounts only to employees who have received management approval to access the account to

perform their official duties. Access to OGE third-party accounts is limited to employees who administer those accounts.

4) What controls are in place to prevent the misuse (e.g., unauthorized browsing) of data by those having access?

OGE takes reasonable precautions to protect its third-party accounts and information voluntarily submitted to OGE on a third-party website. OGE restricts access to its third-party social media and website analytics accounts only to employees who have received management approval to access the account to perform their official duties. Access to OGE third-party accounts is limited to employees who administer those accounts. OGE utilizes best practices for creating secure passwords for its third-party accounts, and all such accounts are clearly identified as official OGE accounts. Additionally, policies governing the creation of an OGE third-party account must be reviewed by the agency's Chief Information Officer, Privacy Officer, and Records Officer to ensure compliance with IT security policy and procedures, federal privacy laws, and federal records laws.

5) Are contractors involved with the design and development of the system and will they be involved with the maintenance of the system? If yes, were Privacy Act contract clauses inserted in their contracts and other regulatory measures addressed?

No.

6) Do other systems share data or have access to the data in the system? If yes, explain.

No.

7) Who will be responsible for protecting the privacy rights of the public and employees affected by the interface?

N/A

8) Will other agencies share data or have access to the data in this system (Federal, State, or Local)?

No.

9) How will the data be used by the other agency?

N/A

10) Who is responsible for assuring proper use of the data?

N/A

See Attached Approval Page

The Following Officials Have Approved this Document

1) System Manager

Nelson Cabrera, Jr. (Signature) 07/6/16 (Date)

Name: Nelson Cabrera, Jr.

Title: Assistant Director, Internal Operations

2) Chief Information Officer

Ty Cooper (Signature) 07-06-16 (Date)

Name: Ty Cooper

Title: Chief Information Officer

3) Senior Agency Privacy Officer

Diana Veilleux (Signature) 7/8/16 (Date)

Name: Diana Veilleux

Title: Chief, Legal, External Affairs and Performance Branch



United States
Office of Government Ethics
1201 New York Avenue, NW, Suite 500
Washington, DC 20005-3917

MEMORANDUM

TO: OGE Employees

FROM: Walter M. Shaub Jr. *Walter M. Shaub Jr.*
Director

DATE: January 17, 2014

SUBJECT: OGE Policy for the Creation and Use of Official OGE Social Media Accounts on Third-Party Websites

I. Overview and Purpose

OGE is committed to expanding its external communication efforts to raise the visibility of the executive branch ethics program generally and OGE's work in particular. These efforts will promote greater understanding of the systems in place to detect and resolve conflicts of interest, thereby increasing public confidence in the integrity of government programs and operations. Social media accounts on third-party websites ("third-party accounts") provide an additional avenue for OGE to inform, educate, and engage its external audiences. In addition, third-party accounts can be used to provide cost-effective online training for ethics officials. This training provides ethics officials with the knowledge and skills needed to carry out the duties of their positions.

This memorandum describes OGE's policies and procedures for the authorization and use of official OGE third-party accounts.

II. Applicability

This policy applies to all OGE employees acting in an official capacity when creating, using, or managing an official OGE third-party account.

This policy does not apply to OGE employees using social media for personal use while using government-owned office equipment; such use is covered by OGE's Policy on Limited Personal Use of OGE Office Equipment. This policy also does not apply to OGE employees using social media in their personal capacities; however, employees are always required to follow the Standards of Ethical Conduct and other applicable laws and regulations (such as the Hatch Act).

III. Definitions

"Social Media" is an umbrella term for forms of electronic communication through which users create online communities to share information, ideas, personal messages, and other content.

These include social networking sites (such as Twitter and Facebook), video-sharing websites (such as YouTube), blogs, and forums.

“Third-Party Website” refers to a website that is not exclusively operated or controlled by a government entity.

IV. Policy

- a. All OGE third-party accounts, including profile content, must be approved in writing by the Program Counsel prior to creating the account.
- b. Prior to setting up an OGE third-party account, employees must consult with the agency employee responsible for reviewing terms of service, the Privacy Officer, the Chief Information Officer, the Records Officer, and any other agency employee with responsibilities in ensuring compliance with applicable federal laws and regulations for the use of a third-party account.
- c. Where feasible, OGE third-party accounts should be identified by using OGE’s full name (U.S. Office of Government Ethics) and official logo, include a link to OGE’s official website (www.oge.gov), and include general contact information for OGE, such as ContactOGE@oge.gov and 202-482-9300.
- d. Links to a third-party account on OGE’s official webpage, www.oge.gov, must be clearly designated as a link to an outside webpage, such as using the icon for the third-party website.
- e. Prior to setting up an OGE third-party account, the account username, profile page content, and associated email account must be approved by the Program Counsel or the head of the branch or division determined by the Program Counsel to be responsible for the third-party account. Third-party account passwords should be created by the employee responsible for setting up and maintaining the third-party account (the account manager).
- f. OGE third-party account passwords should follow best practices for password security. The password should be unique to each third-party account OGE uses. Employees should use due diligence to protect written passwords from unauthorized access.
- g. When prompted to enter an account password, employees should check the URL to make sure they are on the third-party website. If in doubt, employees should go directly to the homepage for that third-party website in the browser.
- h. Third-party account passwords may be shared only with those employees approved in writing to have access to the account by the Program Counsel or by the head of the branch or division determined by the Program Counsel to be responsible for the third-party account. Account access should be granted to a limited number of persons.

- i. The account manager must monitor the third-party account for updates to the third party website's policies and terms of service. The account manager must consult with the appropriate agency official to ensure any changes comply with federal law.
- j. All content posted on OGE third-party accounts must be reviewed and approved in accordance with the policies set forth in the appendices listed in Section VI for each type of third-party account.
- k. When a third-party account "follows," "friends," "subscribes" to, or makes other similar connections to another account, such action does not constitute an endorsement of that account holder. However, OGE employees should be aware that such action could be misconstrued by others to be an endorsement. Therefore, OGE third-party accounts may not "follow," "friend," "subscribe" to, or similarly connect with other user accounts, except for U.S. government entities as approved by the Program Counsel or by the head of the branch or division determined by the Program Counsel to be responsible for the third-party account.
- l. No personally identifiable information (PII) may be requested, collected, or maintained through OGE third-party accounts. Employees may review comments and messages directed at OGE through the third-party website and may use information provided by the user, including PII, to respond to the comment or message.
- m. To the extent that a user posts or sends PII to OGE through its third-party accounts, employees will use the minimum amount of information necessary to accomplish a purpose authorized by statute, executive order, or regulation.
- n. The above privacy policies listed at (l) and (m) must be reflected in a privacy statement and made available, either in full text or through a link to the statement on OGE's official website (www.oge.gov), on the profile page of each OGE third-party account. The statement must also include the following:
 - 1. the specific purpose of OGE's use of the third-party account;
 - 2. a link to the privacy policy of the third-party website and an explanation that the website is controlled or operated by a third party that is not governed by OGE's privacy policies;
 - 3. a statement explaining that all information provided to OGE through its account may be available to the operator of the third-party website and other users; and
 - 4. notice of the use of any web measurement and customization technology in connection with the third-party account.¹

¹ This notice must include the information required by *Memorandum M-10-23: Guidance for Agency Use of Third-Party Websites and Applications*, at Attachment 3, Office of Management & Budget, Executive Office of the President, June 25, 2010

- o. All privacy statements must be reviewed by OGE's Privacy Officer.
- p. To the extent that OGE third-party accounts are used to solicit comments and feedback, the accounts may only be used to solicit general feedback, unless the collection of information complies with the Paperwork Reduction Act and is approved by the Program Counsel or the head of the branch or division determined by the Program Counsel to be responsible for the third-party account.²
- q. In the event that information posted, received, or connected with an OGE third-party account meets the definition of a record, as defined by 44 U.S.C. § 3301 and 36 C.F.R. § 1222.10, employees will adhere and conform to OGE's Records Management Policy. If unsure about how best to comply, employees should contact and work with the Records Management Officer.
- r. Employees using a third-party account on behalf of OGE are bound by the Standards of Ethical Conduct for Employees of the Executive Branch, 5 C.F.R. Part 2635, and other applicable laws and regulations.
- s. All content posted through a third-party account must follow all laws, regulations, and executive orders, which includes but is not limited to copyright, trademark, and privacy laws. Content posted through an OGE third-party account must comply with Section 508 of the American Rehabilitation Act of 1973.
- t. Any use of web measurement and customization technologies in connection with OGE third-party accounts must comply with OMB Memorandum M-10-22: Guidance for Online Use of Web Measurement and Customization Technologies.³ For OGE third-party accounts that use bit.ly hyperlinks as a web measurement technology, the "bit.ly" account may not be linked to the third-party account and the default settings for the "bit.ly" account must be set to private.

V. Responsibilities

The **Program Counsel** is responsible for approving the creation and use of official OGE social media accounts on third-party websites.

The **Program Counsel Division** is responsible for developing policies and procedures for the use of third-party accounts.

² The Paperwork Reduction Act (PRA) does not apply to general solicitations and feedback requests on social media sites, but surveys and specific, structured questions may create a federal record and be covered by the PRA. *See Memorandum for the Heads of Executive Departments and Agencies and Independent Regulatory Agencies*, Office of Mgmt. & Budget, Exec. Office of the President, at 3-4, April 7, 2010.

³ *Memorandum M-10-23: Guidance for Agency Use of Third-Party Websites and Applications*, Office of Management & Budget, Executive Office of the President, June 25, 2010

The **Account Manager** assists in setting up and maintaining the third-party account, posting content to the third-party account, and monitoring for updates to the third-party website's policies and terms of service.

The **Chief Information Officer** is responsible for completing any necessary security assessments and reviewing OGE's third-party account policies and procedures to ensure compliance with IT security policies and procedures.

The **Privacy Officer** is responsible for reviewing OGE's third-party account policies and associated privacy impact assessments and privacy statements to ensure compliance with federal privacy laws.

The **Records Officer** is responsible for reviewing OGE's third-party account policies to ensure compliance with federal records laws.

VI. Related Procedures, Standards, and Guidance

See the attached appendices for additional procedures, standards, and guidance for each type of OGE social media account on a third-party website.

1. Appendix A: Twitter Policies, Procedures, and Guidance
2. Appendix B: YouTube Policies and Procedures
3. Appendix C: Google+ Policies and Procedures

Appendix A: Twitter Policies, Procedures, and Guidance

I. Background

Twitter is an online social networking and microblogging site started in 2006 that has become one of the top ten most visited Internet sites.⁴ All 24 major agencies use Twitter,⁵ as well as agencies comparable in size to OGE.

OGE uses Twitter to promote transparency of executive branch decision making processes by raising visibility of the executive branch ethics program. More specifically, OGE uses its Twitter account to direct users to OGE's official website and to provide target audiences with the latest news from OGE regarding executive branch ethics; links to OGE's latest advisories, education materials, program reviews, reports, and other updated information; updates on relevant ethics legislation; general information about OGE and executive branch ethics; and important dates for federal employees and ethics officials.

II. Policies and Procedures

- a. For security purposes, any Twitter account password should consist of at least 10 characters, including upper and lower case characters, numbers, and symbols.
- b. All content posted through OGE's Twitter account must be approved by the Program Counsel or the designated backup.
- c. All content posted through Twitter that provides evidence of OGE's organization, functions, policies, decisions, procedures, or operations⁶ or contains other substantive information must also exist on OGE's official website (www.oge.gov) and include a hyperlink to the information.
- d. The account manager will respond to direct messages in Twitter requiring substantive information by directing the sender to contact OGE through ContactOGE@oge.gov or by calling 202-482-9300.

III. Guidance for Drafting Tweets

- a. Tweets are limited to 140 characters or less, including spaces. Hyperlinks are shortened to 20 characters, leaving 120 characters for text.

⁴ Twitter now has over 500 million registered users and handles over 1.6 billion searches a day. *Twitter Turns Six*, Twitter.com, (March 21, 2012), <http://blog.twitter.com/2012/03/twitter-turns-six.html>; *Statistic Summary for Twitter.com*, Alexa, (last viewed February 22, 2013) <http://www.alexa.com/siteinfo/twitter.com>

⁵ The major federal agencies include all cabinet level agencies, EPA, GSA, NASA, NSF, OPM, SBA, SSA, and USAID. U.S. Gov't Accountability Office, GAO-11-605, *Social Media* (2011).

⁶ See 36 C.F.R. § 1222.14(b) (extra copies of documents preserved for convenience of reference are considered non-record materials).

- b. The purpose of a tweet is to catch the target audience's attention and direct them to OGE's website and other executive branch ethics information. Tweets should be short and succinct, but interesting enough to catch the reader's attention. Additionally, tweets should use keywords, avoid covering multiple topics in one tweet (one tweet per story), avoid excessive abbreviations, and should link directly to the information or document upon which the tweet is based.
- c. The tone of a tweet should be less formal and more conversational. Employees should write tweets in plain English. Employees should keep tweets simple and use a hyperlink to provide the reader with more details.
- d. When applicable, a tweet should include a hashtag referencing a key term and should include other key terms that match trending topics.
- e. Tweets should be drafted in a manner that makes the content more accessible.⁷
- f. In most circumstances, more than one tweet should be drafted for a given document, website post, or topic. Such circumstances include, but are not limited to, the following:
 - 1. the tweet covers content containing more than one topic;
 - 2. the information provided in the tweet is relevant to more than one type of audience and can be written differently to target each audience;
 - 3. the tweet addresses the release of an OGE report or document.⁸

IV. Managing Twitter Trends

- a. Twitter accounts are most effective when posting tweets related to currently trending issues and stories in the media and on Twitter. To best utilize Twitter, tweets should be targeted towards trends related to executive branch ethics and include key words relating to the trend.
- b. Communication Outreach Group (COG) members will monitor replies to OGE tweets and comments directed at OGE for trends and draft responsive tweets.
- c. COG members will conduct regular searches of Twitter for trending topics and the use of key terms such as, but not limited to, OGE, Office of Government Ethics, conflicts of interest, STOCK Act, and financial disclosure. Based on these searches, COG members will draft appropriate tweets and suggest tweets from other users to re-tweet.

⁷ HowTo.gov, *Improving the Accessibility of Social Media in Government*, General Services Administration (November 19, 2013) <http://www.howto.gov/social-media/using-social-media-in-government/improving-accessibility#tip-twitter>

⁸ For example, the first tweet could announce that the report is released (linking to the report) and a second tweet could contain an explanation of the report or document (linking to an OGE webpage that explains the report in further depth).

- d. COG members will run regular reports through AIMS for inquiries from the press, Congress, federal employees, academia, and public citizens and draft responsive tweets based on topics of interest.

V. Responsibilities

All **OGE employees** are responsible for drafting tweets for all listserv messages, documents and content to be posted to OGE's official website and external education and events for which the employee is responsible.

COG is responsible for reviewing and revising submitted tweets; scheduling the release of tweets; monitoring replies to OGE tweets, comments directed at OGE, and executive branch ethics trends; drafting appropriate responsive tweets; and managing the overall communications strategy for using (or making use of) Twitter.

The **COG Program Manager** is responsible for setting up the Twitter account, posting scheduled tweets with the appropriate hyperlink, responding to direct messages, maintaining the Twitter account, and monitoring for emails regarding Twitter policy and terms of service updates.

The **Program Counsel** is responsible for reviewing and approving all content posted to Twitter, including tweets.

Appendix B: YouTube Policies and Procedures

I. Background

YouTube is a video-sharing website through which users can stream, upload, share, and view videos. OGE uses YouTube to provide educational videos about executive branch ethics rules and the executive branch ethics program and to contribute to the professional development of executive branch agency ethics officials.

II. Policies and Procedures

- a. For security purposes, any OGE YouTube account password should include at least 10 characters, upper and lower case characters, numbers, and symbols.
- b. All final videos or broadcasts must be approved by the Chief of the Legal, External Affairs, and Performance Branch (LEAP) prior to being posted online. The Chief will notify the Training Products Development Section (TPDS) when the videos have been approved and are ready to be posted.
- c. To the extent possible, YouTube settings should be set to not allow comments. Where not possible, TPDS will monitor for comments and replies to OGE posts. OGE will not respond directly to comments received via YouTube other than to direct the commenter to responsive content on OGE's official website (www.oge.gov) or to direct the commenter to contact OGE through ContactOGE@oge.gov or by calling 202-482-9300.
- d. TPDS will create and edit the educational videos to be posted on OGE's YouTube Channel. For webcasts, TPDS will set up and facilitate the webcast and edit the video for final approval of the Chief of LEAP before posting the video to YouTube.
- e. To comply with Section 508 of the Rehabilitation Act, OGE will ensure that videos loaded on YouTube are captioned or will include in the video description on the YouTube channel a statement regarding how an individual may access or obtain a captioned version of the video from OGE. OGE will take all other necessary steps to comply with Section 508 requirements for videos and multimedia presentation as summarized at <http://www.howto.gov/web-content/accessibility/508-compliant-and-accessible-multimedia>.
- f. Multimedia presentations that provide evidence of OGE's organization, functions, policies, decisions, procedures, or operations (including instructional materials for executive branch agency ethics officials) are considered records and must be retained according to OGE's Approved Records Disposition Authorities and the General Records Schedule.

III. Responsibilities

TPDS is responsible for setting up the YouTube account, posting approved videos, maintaining

the YouTube account, and monitoring for emails regarding YouTube policy and terms of service updates.

The **Chief of LEAP** is responsible for reviewing and approving all content posted to YouTube.

Appendix C: Google+ Policies and Procedures

I. Background

Google+ is an online social networking site through which users can share information, pictures, and videos. Google+ also has a live video chatting feature called Google “Hangouts” that allows a user to share documents, scratchpads, images, and YouTube videos with other users. It also includes a feature for broadcasting live video conversations that are accessible to anyone with a web browser. OGE uses Google+ to provide information about the executive branch ethics program and to conduct training for executive branch ethics officials through the Google+ Hangouts feature.

II. Policies and Procedures

- a. For security purposes, any OGE Google+ account password should include at least 10 characters, upper and lower case characters, numbers, and symbols.
- b. All content posted through OGE’s Google+ account must be approved by the Chief of the Legal, External Affairs, and Performance Branch (LEAP). For live video chats through Google+ Hangouts, a proposed schedule of events with topic summaries must be submitted in advance and approved before the event is hosted on Google+.
- c. All content posted through Google+ that provides evidence of OGE’s organization, functions, policies, decisions, procedures, or operations⁹ or contains other substantive information must also exist on OGE’s official website and include a hyperlink to the information.
- d. To the extent possible, the Google+ account settings should be set to allow only OGE to comment. Where not possible, the Training Products Development Section (TPDS) will monitor for comments and replies to OGE posts. OGE will not respond directly to comments received via Google+ other than to direct the commenter to responsive content on OGE’s official website (www.oge.gov) or OGE’s pages on OMB Max (www.max.omb.gov) or to direct the commenter to contact TPDS directly by email or phone or to contact OGE through ContactOGE@oge.gov or by calling 202-482-9300.
- e. TPDS will respond to direct messages in Google+ by directing the commenter to responsive content on OGE’s official website (www.oge.gov) or OGE’s pages on OMB Max (www.max.omb.gov) or by directing the commenter to contact TPDS, Contact OGE, or another OGE employee or group.¹⁰

⁹ 36 C.F.R. 1222.14(b) extra copies of documents preserved for convenience of reference are considered non-record materials.

¹⁰ For example, TPDS would direct press inquiries to the Press Officer and congressional inquiries to the Legislative Team.

- f. OGE will ensure that all multimedia presentations created through Google+ Hangouts are captioned. To the extent that live-captioning of the multimedia presentation creates an undue burden, OGE will provide a captioned version of the presentation either by subsequently posting the captioned presentation on YouTube or Max.gov or posting a statement regarding how an individual may access or obtain a captioned version of the presentation from OGE. OGE will take all other necessary steps to comply with Section 508 requirements for videos and multimedia presentation as summarized at <http://www.howto.gov/web-content/accessibility/508-compliant-and-accessible-multimedia>.
- g. Multimedia presentations created through Google+ Hangouts that provide evidence of OGE's organization, functions, policies, decisions, procedures, or operations (including instructional materials for ethics officials within the executive branch) are considered records and must be retained according to OGE's Approved Records Disposition Authorities and the General Records Schedule.

III. Responsibilities

TPDS is responsible for setting up Google+ accounts, posting approved content, monitoring for message and comments directed at OGE through its Google+ accounts, monitoring for Google+ policy and terms of service updates, and otherwise maintaining the Google+ accounts.

The **Chief of LEAP** is responsible for reviewing and approving content posted to Google+.



UNITED STATES OFFICE OF GOVERNMENT ETHICS

Preventing Conflicts of Interest
in the Executive Branch

Website Policies all OGE

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Third-Party Website Privacy Statement - Social Media

OGE maintains official social media accounts on third-party websites ("third-party accounts") to promote transparency and raise the visibility of the executive branch ethics program and OGE. Raising the visibility of the executive branch ethics program and OGE are critical steps towards building awareness of the systems in place to detect and resolve potential conflicts of interest. Additionally, OGE uses third-party accounts to provide cost-effective online training for ethics officials. This training provides ethics officials with the knowledge and skills needed to carry out the duties of their positions.

Third-Party Website Security and Privacy Policies

User activity on third-party websites is governed by the security and privacy policies of the third-party website. Users of third-party websites often share information with the general public, user community, and/or the third-party operating the third-party website. These actors may use this information in a variety of ways. Consequently, users should review the privacy policies of the third-party website before using it and ensure that they understand how this information may be used. Users should also adjust privacy settings on their accounts on any third-party website to match their preferences. Information about each third-party website that OGE uses, including a link to the third-party website privacy policy, is provided below:

- ◆ **Twitter** is a social networking website and its privacy policy can be found at <http://twitter.com/privacy>.
- ◆ **YouTube** is a video sharing website and users do not have to register with YouTube to view videos posted by OGE. For users registered with YouTube, please note that YouTube is a third-party site governed by a separate privacy policy that can be found at <http://www.youtube.com/t/privacy>.
- ◆ **Google+** is an online social networking website through which users can share information, pictures, and videos. Google+ also has a live video chatting feature called Google Hangouts that also allows a user to share documents, scratchpads, images, and videos with other users and includes a feature for broadcasting live video conversations that are accessible to anyone with a web browser. The privacy policy for Google+ can be found at <http://www.google.com/policies/privacy/>.

The information posted on or directed at OGE through OGE's third-party accounts is generally available to any users who are able to view OGE's profile page. To protect your privacy and the privacy of others, do not include your full name, date of birth, social security number, address, phone numbers, email addresses, case numbers, or any other sensitive personal information in your comments or responses. This information may be archived independently on, and retention of such information is governed by, the third-party website.

OGE Privacy Policy

OGE **will not** use its third-party accounts to: 1) actively seek personal information, 2) search for or by personal information, or 3) "follow," "friend," subscribe to, or take similar action to connect its account to other user accounts, except for U.S. government entities. To the extent a user posts or sends personal information to OGE through its third-party accounts, OGE will use the minimum amount of information necessary to accomplish a purpose authorized by statute, executive order, or regulation. OGE does not request, collect, maintain, or record personally identifiable information (PII) that users submit or publish when engaging with OGE through a third-party website.

OGE Use of Web Measurement and Customization Technology

OGE does use multi-session web measurement and customization technology to monitor traffic directed to its website through OGE's third-party accounts; engagement activities with OGE third-party pages, such as the number of views, clicks on posted links, "likes" and "retweets," and the number of "followers," "friends," "subscribers," or similar connections to OGE's third-party accounts. OGE uses this information to learn about the reach of its external communications by analyzing the number of users who visit OGE's official website through links OGE posts on its third-party sites and to make its website and third-party accounts more useful to its external audiences. This technical data is retained for purposes of conducting an annual review of OGE's effectiveness in meeting its goals to promote transparency of executive branch decision making processes by raising visibility of the executive branch ethics program and to advance a strong uniform executive branch ethics program through ethics education. No PII is provided to OGE through this measurement technology and OGE is unable to identify an individual or track information about a user or a user's account as a result of OGE's use of the measurement technology. Users may choose to visit OGE's official website (www.oge.gov) directly to access the information provided by OGE through its third-party account or choose to disable the cookie feature on their browser to block the transfer of this technical data.

Privacy Impact Assessment

The OGE privacy impact assessment for OGE's use of social media accounts on third-party websites can be viewed [here](#).

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Twitter



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intpriaps02.oge.gov

COG Responsibilities

- Report on branch/division activities
- Serve as Monthly Lead
 - Lead the Tuesday meetings
 - Draft agendas
 - Monthly reports
 - Submit accomplishments for the month
 - Run weekly AIMS report
 - Report out on stats
- [Track outreach](#)
 - Twitter (Monthly) and Articles (Weekly)
 - Director's Notes (Bi-annually)
 - Website Stats (Quarterly)
 - Google+ & You Tube (Bi-annually)
 - Listserv Subscribers (Quarterly)
 - Stakeholder Chart (Quarterly)
 - AIMS Data (Quarterly) -
 - Speaker Requests
- Review stats and making recommendations (Quarterly)
- Draft Reports and Respond to Data Calls
 - Planned work (Quarterly)
 - 6 month Report (Due to Mngmt by April 15 (Date depending on date of SOR))
 - Annual Report (Due to Mngmt by Mid-October)
 - Respond to Data Call for Planned Work and Accomplishments (June/July)
 - Update Accomplishments Log (Monthly)
- Maintain Governance Documents
 - Speaker process
 - Program Guide
- Maintain specific parts of OGE's homepage
 - Rotating Window
 - Banner Announcement
 - Identify content
 - Assign writer
 - Draft Content
 - Approval
 - Prepare post

- Post (determine when it should come down)
- OGE News
 - Identify content
 - Assign writer
 - Draft content
 - Approval
 - Prepare for posting (identify if other post need to be taken down)
 - Post
- Director's Notes
 - Schedule
 - Assigned
 - Written (Note, Tweet, Summary, Date, Subject Tags)
 - Prepare for Approval
 - Approval
 - Editor
 - Prepare for Posting
 - Posted
- Meltwater
 - Review media news and twitter for proactive outreach
- Twitter
 - Draft & Review Tweets
 - Collect standard monthly tweets
 - Control timing and spacing
 - Shepherd Tweets thru the Approval Process
 - Posting
 - Analyze trends and make recommendations
- Promote consistency of OGE messaging
 - Update Speaker Resource Guide (Annually)
 - Consistent "look" to OGE documents
 - Make recommendations to Senior Staff
 - Provide orientation to new employees
 - Provide talking points for Quarterly DAEO and OGE Meetings

- Support FY16 OGE Initiatives

- Marty Campaign

- Draft content
 - Approval
 - Post/Upload Website
 - Circulate to Ethics Community

- Integrity

- Review breach policy for COG considerations
 - Meet with George and discuss what happens during the exercises
 - Develop communications for worst case scenarios

- Website Update

- Review content (Director's Note & News Highlights)

- OpenGov

- Information set Inventory
 - Process for posting new information sets and related website analytics
 - Create an easy to access page oge.gov providing links to information on ethics-related laws under the jurisdiction of other agencies (Brian – need to ask Shelley)

- Summit

- Review communications plan
 - Draft content and schedule
 - Oversee implementation

Twitter Objectives:

1. Emphasize steps individual take to avoid ethics problems
2. Emphasize work OGE does to improve and strengthen ethics programs
3. Emphasize role of citizens in overseeing their government
4. Show OGE at work (in a better way)

Keep Program Review tweets (include "so what")

Re-frame of OGE oversight

DYK that OGE program reviews allow you to assess the health of agency ethics programs? Link to Open Gov.

Hook for specific program review reports (i.e. DYK that we just reviewed x-agency, we had several recommendations for improvement)

We just published our program review report of <agency>. They have already taken steps to strengthen their ethics program. #opengov

Re: Financial disclosure tweets:

Emphasize steps taken to avoid COI.

Learn about the steps that senior government officials take to avoid ethics programs. View their "ethics agreements" at: link

DYK that government officials

OGE is working with <agency> to improve their ethics program. Read our report and recommendations.