SOCIAL MEDIA WORKGROUP
of the
DENTAL PROFESSIONAL ADVISORY COMMITTEE (DePAC)

Standard Operating Procedure (SOP) and Social Media Policy
Version: 1.1
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I. PURPOSE

The purpose of this document is to establish rules, policies, and procedures intended for the Social Media Workgroup (SM WG) of the Dental Professional Advisory Committee (DePAC).

II. BACKGROUND

Social media activities by the DePAC were initiated in 2015 and implemented by members of the Communications Workgroup of DePAC under the direction of the DePAC Executive Committee. The Social Media Workgroup was established in January 2016 to appropriately address and fulfill the social media needs of the dental category of the United States Public Health Service (USPHS).

The DePAC uses social media as a strategic communication tool to recruit dental candidates and disseminate information to officers regarding USPHS activities, events, and announcements. Social media can include, but is not limited to: web and mobile phone applications, blogs, photo and video sharing sites, micro-blogging and social networking sites, and wikis.

Use of social media technologies must follow the current laws and standards that govern information and information technology. This document addresses the most current standards and policies relevant to the use of social media as indicated in the "HHS Social Media Policies Checklist" (HHS, 2015). These policies are applicable to all voting members, subcommittees and organizations within the DePAC.

III. ORGANIZATION & OFFICERS

A. Membership

In accordance with (IAW) the bylaws of the SM WG, the Chairperson will be a voting member of the DePAC and will be the designated social media representative for the Dental Category. All USPHS dental officers and civil service dentists are eligible to volunteer as members of the SM WG. The criteria for membership and roles are determined by the bylaws of the Workgroup (DePAC Bylaws, 2016). There is no specific size requirement of the SM WG.

B. Responsibilities

The primary duty and responsibility of the SM WG shall be to develop and implement social media activities for the DePAC. To achieve these goals, the SM WG shall:

1. Support DePAC engagement with the USPHS Combined Category Social Media Task Force.

2. Adhere to the DePAC social media policies and procedures, review HHS and other relevant policy annually at minimum, and notify the DePAC Executive Committee (XC) if DePAC SM SOP/policy updates are indicated.
3. Oversee and monitor activities on the DePAC Facebook page weekly with more frequent oversight as indicated by page traffic and topic postings.
4. Act in an advisory role to the XC regarding SM policy and procedure and provide support for additional SM project as directed by the DePAC Chair.
5. Annual review and revision of this document as needed and, development of new policies and procedures related to social media technologies.

IV. OPERATIONS & PROCEDURES

A. Social Media Workgroup
1. All of the following WG operations will be IAW the current DePAC Bylaws.
2. WG Chair duties, meeting frequency and requirements, monthly reports to the XC, and member expectations.
3. Monthly reports will include current information about all Dental PAC social media channels, level of engagement (i.e. number of posts), and recommendations for future initiatives.

B. Information Management Standards
1. Review the Standard Operating Procedure and Social Media Policy annually and revise as needed.
2. Develop new guidance, policies, and/or procedures as required or as tasked.
3. Regularly review other dental and public health social media channels for traffic trends as well as relevant dental and public health topics.
4. Regularly monitor social media policies from HHS, National Archives and Records Administration (NARA), General Records Schedules (GRS), and other federal government agencies.

C. System Administrator Groups
1. The WG Chair will be responsible for managing all Dental PAC SM channel administrator groups.
2. The WG Chair will maintain a list of all Dental PAC SM channels and their administrator groups.
3. Assignment of WG members to administrator groups will be determined at the start of each calendar year by the WG Chair or his/her designee.
4. These groups will be updated by the WG Chair as needed throughout the year.

D. DePAC SM Posting Process
1. Submission, Clearance and Approval Process:

a. All postings that officially represent the DePAC must adhere to the submission, clearance, and approval process. All system administrators are authorized to determine the appropriateness of a post for the SM channel they administer.

     b. Posting requests may be direct or indirect.

          i. Any request to post information on a SM channel that is routed to a WG member is considered to be direct. If a member is not an appointed system administrator he/she must route the request to the WG Chair or Vice Chair for review.

          ii. Any request which is submitted through a SM channel is considered indirect and must be reviewed for appropriateness by the system administrator of that SM channel. Indirect requests are not required to be submitted to the SM Chair or Vice Chair unless they are deemed inappropriate.

     c. All requests must be Section 508 compliant for posting. The Workgroup will refer to the United States Access Board for the Guide to Section 508 Standards. This site is intended for federal government guidance regarding Section 508 compliance and available web applications to help determine the accessibility of social media tools that are being considered for official use by the DePAC.

     d. The SM WG Chair and Co-Chair will consult with the DePAC Chair to ensure messages posted on the social media channels are appropriate for the public. All official postings will be reviewed by the appointed system administrator, Chair or Vice Chair as defined by the post type (direct vs indirect) in order to eliminate inaccurate or misleading statements as well as to determine appropriateness or relevance to the dental profession or the USPHS.

     e. Each member authorized to review posts (i.e. system administrator/ Chair/ Vice) will be responsible to maintain a log of posts that were reviewed and the outcome.   Review of posts will be completed within 1 week to ensure information is provided on SM channels in a timely manner. All rejected posting requests will be reported to the Chair detailing the reasons for rejection.

     f. All approved posting requests will be sent to the appropriate social media channel.

     g. All rejected posting requests will be tracked by the WG Chair. This information will included in the DePAC monthly reports highlighting any trends associated with rejections.

2. WG Member-Identified Content: WG Members may identify content for posting while reviewing dental professional sites and other government SM sites. Content appropriate for re-posting on the Dental PAC SM channels may include (but are not limited to):

a. Content from other HHS social media outlets.

b. DePAC content that has been posted to the Dental Bulletin Board (DBB) listserv.

c. Content from the Commissioned Corps Management Information System (CCMIS) web page, to include the DePAC section.

d. USPHS job postings that have also been announced via other sources.

e. Current dental health news and articles with relevant dental or public health information. Government sources are preferred as compared to private news resources (e.g. CNN, JADA, etc), especially when a link is included due to Section 508 compliance.

E. HHS Social Media Policy Requirements

1. Access and IT Security

   a. Members of the SM WG will read the "Policies that Apply to Social Media" and the "Best Practices for Protecting Third-Party Websites and Applications" at a frequency of not less than once every operational term, or after a change in leadership or membership, whichever occurs first.

   b. The DePAC Incident Response Plan (Attachment A) outlines relevant implications, procedures for notifying internal personnel, and includes the appropriate response when a security incident occurs or inappropriate content is posted.

2. Licensing

   a. The Workgroup will check the list of HHS Terms of Service Agreements to ensure that HHS agreements exist for all social media channels used by the DePAC.

   b. The DePAC will not use any third-party service for social media purposes that does not have a Term of Service agreement with HHS.

3. Copyrighted Content

   a. The Workgroup will use only approved logos on DePAC SM channels to clearly identify ownership by the DePAC and USPHS.

   b. The Workgroup, via the Chair or Co-chair, will seek approval from the DePAC Chair for use of any non-government logos or trademarked images.

4. Official Agency Sources of Information

   a. The Workgroup will ensure that each DePAC social media site, app, or tool is linked to the DePAC official website https://dcp.psc.gov/osg/dentist to facilitate the ability for users to find additional information from an official source.

   b. The Workgroup will not collect personally identifiable information (PII) on any DePAC social media channels. The public may post their own PII as

comments, but it will not be retained by the SM WG and will be removed from public viewing.

c. The Workgroup will complete an adapted Privacy Impact Assessment (PIA) for each DePAC SM channel. The Workgroup will contact HHS.cybersecurity@hhs.gov to obtain the PIA form. The PIA will be reviewed annually for updates.

d. Privacy Notice and Posting
   i. The DePAC does not have an established Privacy Policy. The DePAC will use and adhere to the HHS Privacy Policy for all DePAC SM channels.
   ii. The Workgroup will prominently post the HHS Privacy Notice on all social media channels to the extent feasible.

5. Use of Cookies with Third-Party Sites and Applications
   a. The Workgroup will not accept nor solicit information from its social media third-party sites and applications that contain user information (i.e., user activity, personally identifiable information) collected by web measurement and customization technologies (persistent cookies).
   b. In the event that a social media tool is embedded or incorporated on the DePAC official website, the Workgroup will take necessary steps to disclose the Privacy Policy.

6. Record Keeping
   a. The DePAC Web Records Schedule (Attachment C) should be referenced for details associated with record keeping and the utilization of social media. The WG will perform an annual review and update of this document when appropriate.
   b. The U.S. National Archives and Records Administration (NARA) will be consulted annually to review the social media records recommendations.
   c. Photo consent collected for all DePAC social media channels will be maintained by the SM Chair and the DePAC Chair. The consent will be retained indefinitely as long as the photos are being used by the social media channels.

7. Comment Moderation
   a. The Workgroup will clearly state or include a link to the "HHS Comment, Privacy, and Link Policies" on all DePAC social media channels to the extent possible.
   b. The WG will develop and implement procedures for each social media channel for moderating (reviewing and clearing) all comments before they are posted, to the extent feasible.
   c. For current DePAC Facebook Page comment moderation procedures see section IV.E.2 of this document.

8. Linking, Liking, Following, and Endorsement

a. The WG will include an exit disclaimer when linking to non-government links (social media channels) from the DePAC social media site.
b. The WG Chair will consult with the DePAC Chair regarding appropriate entities to follow/like from DePAC SM accounts.

F. Facebook Page

1. Objectives
   a. The Facebook page is intended for multiple information dissemination objectives as listed below, but not limited to:
      i. Sharing USPHS relevant information with existing Corps Officers.
      ii. Increased visibility of initiatives and policy released from the OSG.
      iii. Information pertaining to the current standards of practice for the profession of dentistry and public health.
      iv. Providing information regarding the USPHS dental program for potential applicants.
      v. Any additional information as per request by the dental category's Chief Professional Officer provided it is within appropriate SM policy.

2. Facebook Posting Moderation
   a. The DePAC SM WG will consider all direct and indirect requests for posting of information (see section IV.D.1 of this document).
   b. The Workgroup Chair and Co-Chair will select SM WG members to serve as the DePAC Facebook administrators. These administrators will be individually assigned to review all posts and content on a rotating schedule set by the WG Chair. Any assigned administrator can approve a post during their rotation. Administrators may consult with the Chair or Vice Chair if there is uncertainty associated with the appropriateness of a post.

3. Allowable posts
   a. Information posted on the Facebook page may include the following:
      i. Job announcements;
      ii. Legislation changes involving the Commissioned Corps that have been released and made public;
      iii. Agency-specific information/links/articles;
      iv. Current dental health and public health news/articles;
      v. Other information approved by the Dental CPO or DePAC Chair

   b. Information (comments, photos, etc.) will not authorized for posting if it includes and of the following:
      i. Political views;
      ii. Personally Identifiable Information (PII);
      iii. Personal attacks;
      iv. Comments on unreleased policies or internal working documents;

v.   Explicit commercial endorsements;

vi.   Threatening, obscene, or discriminatory language (including hate speech) about race, color, national origin, age, sex (including sexual orientation and gender identity), religion, disability, or other legally or agency-protected group;

vii.   Photos of an officer with unacceptable or incorrect uniform wear;

viii.   Content or links irrelevant to dental health and/or public health;

ix.   Embedded media, such as videos or photos (hyperlinks are acceptable);

x.   Spam or undecipherable language (gratuitous links will be viewed as spam).

4.   Vacancy Announcements
   a.   All job postings should include an agency contact person.
   b.   Job postings that appear on the Facebook page may not always have a duplicate posting on the DePAC official web page or the DBB listserv.

5.   Photo Requirements
   a.   Encourage the submission of action shots that tell a story so that prospective dental officers see work in action.
   b.   Provide captions that identify the agency and individual(s), and that describe the task/activity depicted in photo; however, minimize the use of first and last name together. For example, LCDR John Doe should be captioned appropriately as LCDR Doe.
   c.   Ensure officers in photos are wearing uniform correctly.
   d.   Exclude photos that may contain personally identifiable information.
   e.   Disable geotagging settings.
   f.   Self-edit photos before submitting a request to post by removing irrelevant, random, and duplicate images.
   g.   Submit one simple image per event/activity/individual. Multiple photos of a single event/activity/individual may not be posted.
   h.   All photos must be submitted with a photo release for the individual(s) shown. (Attachments C, D).

V.   ATTACHMENTS
   Attachment A. DePAC Social Media Incident Response Plan
   Attachment B. DePAC Web Records Schedule
   Attachment C. Photo Release Individual
   Attachment D. Photo Release Group
   Attachment E. References

Attachment A. Incident Response Plan

DePAC Social Media Incident Response Plan

Introduction
In accordance with the <u>National Institute of Standards and Technology (NIST) Special Publication (SP) 800-53 Rev. 4</u>, HHS defines a computer security incident as "a violation or imminent threat of violation of computer security policies, acceptable use policies, or standard computer security practices." Use of third-party systems is not without risk (i.e., may be "hacked"). To address this risk, the DePAC created an incident response plan as a best practice measure to protect DePAC information, reduce chances of getting hacked, and to plan ahead in the event a DePAC social media channel is compromised. Although the social media channel such as Facebook, Twitter, or Instagram is a tool that is not owned by the government, the content will be regularly monitored and action will be taken to edit, remove, or replace inappropriate content while still allowing a discussion.

Purpose and Scope
This Incident Response Plan establishes standards and procedures for how the DePAC is notified of and responds to an incident, including but not limited to, potential and real cyber-attack, unsolicited posts, inappropriate posts, and defacement or hijacking of DePAC social media channels.

This plan applies to all DePAC members and individuals representing the DePAC who use, or collect and maintain information on official DePAC social media channels.

Response Procedure
The response plan described below begins when an incident is first discovered and reported by anyone—general public, DePAC members, contractor, etc.

Notification
1. The DePAC member who identifies or receives the report of an incident on a DePAC social media channel will send a notification e-mail to the DePAC Chair and Vice-Chair as well as the DePAC SM WG Chair or Co-Chair.
2. The System Administrators (members of the Social Media Workgroup) will assess the incident and take appropriate action.
3. Depending on the severity of the incident, the DePAC may recommend that the incident be elevated beyond the DePAC to the HHS Computer Security Incident Response Center (CSIRC) at <u>csirc@hhs.gov</u> or 866-646-7514.

Documentation of the Incident
Documentation of the incident is important, especially if any investigation should lead to legal action. In that case, it is incumbent on the DePAC to produce all information ensuing from the investigation, including written communications, samples of the "before" and "after" defacement pages (i.e., screenshots), cost and time accounting for remediation, and the final report/lessons learned.

1. The Administrators will take screenshots of the incident, collect log files, and any other pertinent information regarding the incident or defacement.
2. The screenshots and information gathered will be maintained by the SM Chair and the DePAC Chair.
3. Retention of this information will be for one calendar year after the incident pending no additional action is determined.

Investigation and Remediation
1. The Administrators will provide the collected information of the compromised page to the DePAC SM for evaluation and analysis.
2. After remediation has been completed, a final report will be provided to the DePAC SM WG and will include:
   • What allowed the defacement to occur;
   • Steps taken to ensure no further defacements occur;
   • Amount of time necessary to respond to the incident and remediate the issue(s);
   • Any issues noted with other DePAC SM sites.
3. Once the cause of the problem is determined, the password for the compromised social media channel is changed and reevaluated.
4. Any other social media pages that were built in a similar fashion or using similar technologies must also be monitored for potential hacking(s).
5. The Administrators will then republish the corrected page. It will be regularly monitored for a repeat incident for one (1) month post-incident. Additionally, content managers of all sites, not just compromised ones, will verify accuracy of time-sensitive information and hacking on a quarterly basis.

Attachment B. Records Schedule

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DePAC Web Records Schedule

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DePAC web records are written or electronic materials that document procedures and decisions related to the operation and maintenance of DePAC social media platforms, including but not limited to the DePAC Facebook Page.

The following web materials may be considered web records:

1. Written documents (governance, reports, memoranda, promotional pieces, letters, etc.) dealing with the creation, management and maintenance of DePAC social media platforms.
2. Design documents (wire frames, sites design, etc.) dealing with the creation, management and maintenance of DePAC social media platforms.
3. Other DePAC-related web content, including but not limited to:
    a. Blogs or other interactive web content,
    b. Public input related to and delivered via other web-based DePAC platforms.

DePAC Web Records Schedule

The DePAC web records schedule establishes categories of records, determines how long categories of records must be kept and defines when the records may be deleted or destroyed. The DePAC SM WG will oversee and update this schedule with consultation by the DePAC webmasters as needed. The HHS Web Records Policy & Guidance (2007) will be used as reference in developing and usage of this schedule.

Records Schedule

#	ADMINISTRATIVE WEB RECORDS:	SCHEDULE	DEFINITION
1.	Templates, style sheets, and code that determine site architecture	May be destroyed when superseded or no longer applicable.	Non-essential working papers retained by CMU WG for reference purposes.
2.	Web site design records	May be destroyed when one (1) year old.	Non-essential working papers retained by staff member for reference purposes.
3.	Web management and operations records	May be destroyed when two (2) years old.	Oversight and compliance record.
4.	Metrics – inventory of Web activity (Web Trends, etc.)	May be destroyed every two (2) months, or when superseded or no longer applicable.	Oversight and compliance record.
7.	Log Files	May be destroyed when superseded or no longer applicable.	Transitory files. Documents of a short term interest which have no documentary or evidential value.

Records Schedule (continued)

#	ADMINISTRATIVE WEB RECORDS:	SCHEDULE	DEFINITION
8.	Usability records, including test designs and usability testing reports	May be destroyed when superseded or no longer applicable.	Testing record.
9.	"Contact Us" Web communication from the public commenting or requesting information	May be destroyed three (3) months after issue is resolved, or request has been fulfilled.	Requests for information and copies of replies thereto, involving no administrative actions, no policy decisions, and no special compilations or research and requests for transmittals of publications, photographs, and other information.
10.	Other transitory files – routine requests for information or publications (no policy decisions or administrative actions required)	May be destroyed when three (3) months old.	Transitory files. Documents of a short term interest which have no documentary or evidential value.
#	CONTENT WEB RECORDS:	SCHEDULE	DEFINITION
1.	Dynamic home pages that change frequently reflect temporal importance and/or carry content created by the Web's managing entity	May be destroyed when 90 days old.	Office Working File.
2.	Web management content	May be destroyed one (1) year after the content is no longer of use.	Oversight or compliance file.
#	HACKING AND OTHER INCIDENT INVESTIGATIONS:	SCHEDULE	DEFINITION
1.	Written communications, samples of the "before" and "after" hacked pages (i.e., screenshots), cost and time accounting for remediation, final report/lessons learned	May be destroyed after one (1) year.	Email correspondence, photos, documents and other investigation files.

Attachment C. Photo Release - Individual

USPHS Dental Professional Advisory Committee
Individual Photo/Image Release Form

Date: _____, 20_____

The United Health Public Health Service Dental Professional Advisory Committee collects photographs and images as a means of visually transmitting USPHS activities, events and announcements for recruitment, retention and to disseminate information. We request your permission and consent to include your photographs and images in our various forums. These photographs and images will be used only for official purposes.

I, (print name, including rank) _____,
hereby voluntarily grant consent to the United States Public Health Service Dental Professional Advisory Committee without expectation of compensation, to publish photographs and images of me for full use, without restriction of any kind, or of anyone for whom I have legal responsibility on this date for all official publication, presentation, exhibit, video or other print or digital format.   I further grant the United States Public Health Service Dental Professional Advisory Committee full rights to reuse my photographs and images.

_____
Signature

_____
Name of minor(s)

_____
Guardian Signature (if granting permission for a minor)

Attachment D. Photo Release - Group

USPHS Dental Professional Advisory Committee
Group Photo/Image Release Form

Date: _____, 20_____

The United Health Public Health Service Dental Professional Advisory Committee collects photographs and images as a means of visually transmitting USPHS activities, events and announcements for recruitment, retention and to disseminate information.   We request your permission and consent to include your photographs and images in our various forums. These photographs and images will be used only for official purposes.

We hereby voluntarily grant consent to the United States Public Health Service Dental Professional Advisory Committee without expectation of compensation, to publish our photographs and images for full use, without restriction of any kind, or of anyone for whom we have legal responsibility on this date for all official publication, presentation, exhibit, video or other print or digital format. We further grant the United States Public Health Service Dental Professional Advisory Committee full rights to reuse all photographs and images.

Rank	Name(guardian or member)	Minor's Name	Signature (guardian or member)

Attachment E. References

References

1. Bylaws of the U.S. Public Health Service Dental Professional Advisory Committee. (2016). *Bylaws of the Social Media Workgroup*.

2. National Institute of Standards and Technology (NIST) (2013). *Security and Privacy Controls for Federal Information Systems and Organizations.* NIST Special Publication (SP) 800-53 Rev. 4. Retrieved from http://csrc.nist.gov/publications/drafts/800-53-rev4/sp800-53-rev4-ipd.pdf

3. U.S. Department of Health and Human Services (HHS). (2007). *HHS Web Records Policy & Guidance.* Retrieved from http://www.hhs.gov/web/policies-and-standards/web-policies/web-records/index.html U.S. Department of Health and Human Services (HHS). (2014). *HHS Information Security and Privacy Policy (IS2P) – 2014 Edition.* Retrieved from http://www.hhs.gov/ocio/policy/#Security

4. U.S. Department of Health and Human Services (HHS). (2015). HHS Social Media Policies Checklist. Retrieved from https://www.hhs.gov/sites/default/files/web/socialmedia/getting_started/checklist_social_media_policies.pdf