



# Office of Inspector General United States Department of State

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Office of Evaluations and Special Projects

February 2019

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## **Management Assistance Report: Use of Personal Social Media Accounts to Conduct Official Business**

**MANAGEMENT ASSISTANCE REPORT**

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## Summary of Review

The Office of Inspector General (OIG) received allegations that certain ambassadors were violating Department of State (Department) policy by using their personal social media accounts to post about issues of Department concern. OIG conducted a review of Department social media policies and the personal Twitter accounts of all of the Department's ambassadors that OIG could locate. OIG found that some of those ambassadors have posted information that does not appear to comply with Department policies regarding social media. OIG also found, however, that the Department's guidance on this topic lacks clarity.

## BACKGROUND

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The Department encourages its employees, "in both their official and personal capacities" to undertake "responsible activities, including public communications" to advance U.S. foreign policy.<sup>1</sup> It specifically notes that "social media provides an important means for the Department to fulfill its lead role in the conduct of U.S. foreign policy" and so "encourages innovative and responsible use of social media by employees."<sup>2</sup> Department bureaus, embassies, consulates, and other missions may use various social media platforms, such as Twitter and Facebook, as tools for public diplomacy.<sup>3</sup>

The Department's social media policies are set forth in the Foreign Affairs Manual (FAM), the Foreign Affairs Handbook, and diplomatic cables. These policies distinguish between official and personal social media postings. Official postings are those made "pursuant to an employee's employment responsibilities, or in any capacity representing the Department."<sup>4</sup> Personal postings are those postings that are made in the employee's capacity as a private citizen and that do not represent the official position of the Department.<sup>5</sup>

If an employee is making an official posting, the FAM requires it to be placed on the social media account created and managed by the Department, rather than a personal account created and managed by the employee.<sup>6</sup> These official accounts must be clearly labeled and identifiable as official and named according to the Department's naming convention.<sup>7</sup> The FAM identifies several

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<sup>1</sup> 3 FAM 4174.1(a) (July 27, 2015).

<sup>2</sup> 3 FAM 4174.1(b) (July 27, 2015); *see also* 5 FAM 792.1 (June 10, 2010) (encouraging "responsible use" of social media).

<sup>3</sup> The Department maintains a public list of official social media accounts on its website: <https://www.state.gov/r/pa/ode/socialmedia/>

<sup>4</sup> 3 FAM 4173 (March 27, 2017).

<sup>5</sup> 3 FAM 4173 (March 27, 2017).

<sup>6</sup> 10 FAM 181.1(b) (August 24, 2017); 10 FAM 182(a) (August 24, 2017).

<sup>7</sup> 10 FAM 181.2 (August 24, 2017). For example, on Twitter, the official accounts have a handle that begins with "usamb" or "usembassy."

important justifications for this requirement, including compliance with the Federal Records Act. In fact, if an employee uses his or her personal social media account for official communications, those accounts are then considered Department accounts and must either be retained by the Department for use by the next incumbent or retired in accordance with applicable records disposition schedules.<sup>8</sup>

On the other hand, if the employee intends to make a personal posting and the subject of the posting relates to a topic “of Departmental concern,” the employee must seek Department review before doing so.<sup>9</sup> The FAM defines “of Departmental concern” as “pertaining to current U.S. foreign policy or the Department’s mission (including policies, programs, operations or activities of the Department of State or USAID), or which reasonably may be expected to affect the foreign relations of the United States.” The FAM sets out the relevant review office for different types of employees; for Chiefs of Mission, the final review office is the Bureau of Public Affairs (PA).<sup>10</sup> The FAM notes that there are important reasons for this review requirement, including the Department’s need to determine whether the communication would disclose classified or other protected information without authorization, to allow the Department to prepare for potential ramifications for its mission or employees that could result from the proposed public communication, or to identify “public communications that are highly likely to result in serious adverse consequences to the mission or efficiency of the Department, such that the Secretary or Deputy Secretary must be afforded the opportunity to decide whether it is necessary to prohibit the communication.”<sup>11</sup>

## FINDINGS

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OIG received allegations that four ambassadors were using their personal social media accounts in violation of Department policy. OIG reviewed the personal social media accounts of these four ambassadors and confirmed that all had posted about matters of Department concern. Most of these posts simply reposted content from official Department accounts, which does not violate Department policy. However, each of the four ambassadors did, to varying degrees, post original content that related to issues that were clearly of Departmental concern.

OIG also examined whether other ambassadors were in compliance with the Department’s social media policies. OIG attempted to identify and review the personal Twitter accounts of the ambassadors to other nations and to international organizations as well as those of individuals serving as ambassadors-at-large.<sup>12</sup> As of September 12, 2018, there were 138 officials serving in

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<sup>8</sup> 10 FAM 182(c) (August 24, 2017).

<sup>9</sup> 3 FAM 4173 (March 27, 2017). Employees do not need to seek approval to repost or retweet content that has previously been posted to an official Department account. 10 FAM 182(a)(1) (August 24, 2017).

<sup>10</sup> 3 FAM 4174.3(a) (March 27, 2017).

<sup>11</sup> 3 FAM 4174.2(c)(1) (March 27, 2017).

<sup>12</sup> OIG limited its social media search to Twitter, because its users are far more likely to make their posts public, as compared to other social media platforms.

these positions. Of the 138 officials, OIG was able to locate personal Twitter accounts of 37 ambassadors.<sup>13</sup> Of those 37 personal accounts, 20 ambassadors posted original content that related to issues that were clearly of Departmental concern.<sup>14</sup>

Some examples of these posts follow:

- One ambassador frequently uses a personal Twitter account to support sanctions against Iran and to encourage corporations not to do business in Iran.
- In December 2017, an ambassador used a personal Twitter account to endorse the resumption of diplomatic ties between the European Union and the ambassador's host nation.
- In March 2018, an ambassador used a personal Twitter account to thank allied governments for supporting an inquiry into the nerve agent attack in Salisbury, England.
- In April 2018, an ambassador posted on a personal Twitter account criticism of Russia for failing to support an investigation of the use of chemical weapons by the Syrian government.
- In June 2018, an ambassador used a personal Twitter account to condemn corruption in the ambassador's host nation.

In June 2018, OIG requested from PA a list of all personal social media posts it had reviewed since June 2016. The 15 instances that PA provided did not include any of the posts described above; in fact, none of the requests for review were made by an ambassador.

As an initial matter, OIG found that the FAM itself does not clearly distinguish between official and personal postings. The FAM defines official capacity as "pursuant to an employee's employment responsibilities, or in any capacity representing the Department, regardless of location or forum."<sup>15</sup> The FAM defines personal capacity as "not pursuant to an employee's official capacity."<sup>16</sup> Both definitions lack specificity, and even PA officials with whom OIG met had difficulty in articulating the difference between them and the circumstances in which each definition would apply.

However, OIG also found that the posts above, as well as other posts that OIG reviewed, were inconsistent with existing Department policies regardless of how they are designated. If the posts

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<sup>13</sup> Other ambassadors may have personal Twitter accounts, but OIG was unable definitively to locate such accounts. This could be because they used a pseudonym or because the accounts were for individuals with a common name but did not have a photograph associated with their account.

<sup>14</sup> These 20 accounts included the original 4 ambassadors.

<sup>15</sup> 3 FAM 4173 (March 27, 2017).

<sup>16</sup> 3 FAM 4173 (March 27, 2017).

described are treated as personal postings, the ambassadors did not seek the required review from PA to post on topics of Departmental concern.<sup>17</sup> If, however, they are treated as official postings, the ambassadors did not follow Department policy that requires such postings to be made on official, rather than personal, social media accounts.<sup>18</sup>

The Department should ensure that its employees—ambassadorial and non-ambassadorial alike—understand how to properly manage their social media accounts. Although this review was limited to ambassadors, OIG notes that the issues discussed have implications for a range of Department employees.

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<sup>17</sup> 3 FAM 4173 (March 27, 2017).

<sup>18</sup> 10 FAM 181.1(b) (August 24, 2017); 10 FAM 182(a) (August 24, 2017).

## RECOMMENDATIONS

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OIG makes three recommendations to the Office of Policy, Planning and Resources within the Office of the Under Secretary for Public Diplomacy and Public Affairs. Its complete response can be found in the appendix.

**Recommendation 1:** The Office of Policy, Planning and Resources, in coordination with the Bureau of Public Affairs and the Bureau of International Information Programs, should clarify the distinction in the Foreign Affairs Manual between personal and official social media postings and give examples of each type.

**Management Response:** In its December 14, 2018, response, the Office of Policy, Planning and Resources concurred with this recommendation and noted that it will ask the recently formed Social Media Account Working Group to clarify the Department's guidance and post this update to the Social Media Hub. The Department expects that "case-specific examples" will be posted on the Department's Social Media Hub in approximately three months.

**OIG Reply:** Based on the Department's response, OIG considers this recommendation to be resolved. The recommendation can be closed when OIG receives a copy of the updated guidance.

**Recommendation 2:** The Office of Policy, Planning and Resources should issue periodic, regular notices to Department employees to remind them of the Department's policies regarding the use of personal social media accounts.

**Management Response:** In its December 14, 2018, response, the Office of Policy, Planning and Resources concurred with this recommendation. It noted that Department employees currently receive "sporadic" reminders of the Department's policies regarding the use of personal social media accounts. It stated that it will "regularize and coordinate" these reminders and issue them at least annually.

**OIG Reply:** Based on the Department's response, OIG considers this recommendation to be resolved. The recommendation can be closed when OIG receives copies of such reminders.

**Recommendation 3:** The Office of Policy, Planning and Resources, in coordination with the Bureau of Public Affairs and the Bureau of International Information Programs, should review the personal Twitter accounts of ambassadors and other senior Department officials and take appropriate action to remedy any violations of Department policy.

**Management Response:** In its December 14, 2018, response, the Office of Policy, Planning and Resources concurred with this recommendation and noted that it will ask the Social Media Account Working Group to develop and implement "more detailed guidelines, roles, and responsibilities for reviewing social media accounts" and for taking "appropriate action to remedy any violations of

Department policy." The Department estimated that it will develop and implement these guidelines in six months.

**OIG Reply:** Based on the Department's response, OIG considers this recommendation to be resolved. The recommendation can be closed when OIG receives documentation of this process.

# APPENDIX: DEPARTMENT OF STATE RESPONSE



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**United States Department of State**

***Washington, D.C. 20520***

December 14, 2018

## **MEMORANDUM**

**TO:** OIG – Jeffery McDermott

**FROM:** R/PPR – Brian Heath, Acting

**SUBJECT:** Response to OIG Management Assistance Report – Use of Personal Social Media Accounts to Conduct Official Business

The Under Secretary for Public Diplomacy and Public Affairs (R)'s Office of Policy, Planning and Resources (R/PPR), in coordination with the Bureau of Public Affairs (PA) and the Bureau of International Information Programs (IIP), offers the following comments in response to the above-captioned Report and its recommendations.

**OIG Recommendation 1:** The Office of Policy, Planning and Resources, in coordination with the Bureau of Public Affairs and the Bureau of International Information Programs, should clarify the distinction in the Foreign Affairs Manual between personal and official social media postings and give examples of each type.<sup>1</sup>

**Management Response:** We concur with Recommendation 1. The Department recently established a Social Media Account Working Group (consisting of representatives from R/PPR, L, PA, IIP, and M) to examine potential gray areas within the Department's policies regarding the use of personal social media accounts that may warrant further consideration. R/PPR, in coordination with PA and IIP, will ask the Working Group to review the relevant policies as reflected in the Foreign Affairs Manual, clarify the distinction between personal and official social media postings, and give examples of each type. Due to the rapidly changing information environment and evolutions of technology, we expect the case-specific examples will be posted to IIP's Social Media Hub (<http://socialmedia.state.gov>), which serves as the Department's internal repository for digital media best practices and guidance. The estimated timeline for doing so is three months.

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<sup>1</sup> In the original version of the draft Report that R/PPR, PA, and IIP received from OIG, all three recommendations were addressed to PA. As a result of subsequent discussions about the appropriate allocation of responsibility for these issues within the Department, OIG agreed to direct Recommendations 1 and 3 to R/PPR, in consultation with PA and IIP, and to direct Recommendation 2 to R/PPR. Our responses here reflect these corrections to the original recommendations.

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**OIG Recommendation 2:** The Office of Policy, Planning and Resources should issue periodic, regular notices to Department employees to remind them of the Department's policies regarding the use of personal social media accounts.

**Management Response:** We concur with Recommendation 2. While Department employees now receive sporadic reminders of the Department's policies regarding the use of personal social media accounts, R/PPR will regularize and coordinate these reminders. To begin with, R/PPR will issue such notices at least annually, and will reassess the content and frequency of the notices as appropriate. As needed, R/PPR will also coordinate with other Department offices to provide additional guidance on appropriate use of social media.

**OIG Recommendation 3:** The Office of Policy, Planning and Resources, in coordination with the Bureau of Public Affairs and the Bureau of International Information Programs, should review the personal Twitter accounts of ambassadors and other senior Department officials and take appropriate action to remedy any violations of Department policy.

**Management Response:** We concur with Recommendation 3. While we have reviewed and taken action on individual accounts in the past, R/PPR, in coordination with PA and IIP, will ask the Social Media Account Working Group to develop and implement more detailed guidelines, roles, and responsibilities for reviewing social media accounts and taking appropriate action to remedy any violations of Department policy. The estimated timeline for developing and implementing these guidelines, roles, and responsibilities is six months.

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