

March 1, 2013

MEMORANDUM TO: Stephen D. Dingbaum
Assistant Inspector General for Audits
Office of the Inspector General

FROM: Darren B. Ash **/RA/**
Deputy Executive Director
for Corporate Management
Office of the Executive Director for Operations

SUBJECT: INDEPENDENT EVALUATION OF NRC'S USE AND SECURITY
OF SOCIAL MEDIA (OIG-13-A-08)

This is in response to the Office of the Inspector General's (OIG) "Independent Evaluation of NRC's Use and Security of Social Media" (Report Number OIG-13-A-08), dated January 23, 2013. The Office of Public Affairs, the Office of Information Services, and the Computer Security Office have addressed the 34 recommendations. The management decision, corrective actions, target completion date, and point of contact for each recommendation are enclosed.

Enclosures:
As stated

cc: Chairman Macfarlane
Commissioner Svinicki
Commissioner Apostolakis
Commissioner Magwood
Commissioner Ostendorff
SECY
OPA

CONTACT: Jack Montgomery, OIS/BPIAD/EASB
301-415-5984

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NAME	S. Daniel, Acting:	M. Givvines:	J. Flanagan: M. Givvines for	D. Ash:
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INDEPENDENT EVALUATION OF NRC’S USE AND SECURITY OF SOCIAL MEDIA (OIG-13-A-08)			
Recommendation	Response	Completion Date	POC
1. Broaden NRC’s definition of success beyond quantitative viewership rates to include qualitative evaluations of digital influence, thought leadership within the nuclear social media discussion, and strength of relationships with prominent influencers.	<p>Agree</p> <p>Action—Standards for Government agencies to measure social media success are currently being developed by the General Services Administration’s (GSA’s) Center for Excellence in Digital Government. When these are finalized, the Office of Public Affairs (OPA) will review and adopt those most appropriate for an independent regulatory agency to use as indicators of successful outreach to the public.</p>	End of CY 2013	OPA, Holly Harrington
2. Develop and implement a process to monitor user activity on NRC’s social media platforms after content posts to evaluate content vitality and network distribution.	<p>Agree</p> <p>Action—With the hiring of a full-time social media specialist, OPA has been able to expand its practice of monitoring activity on the NRC’s social media platforms and evaluating the impact of content. OPA is now beginning to use the built-in analytics on the agency’s social media platforms, with an emphasis on the blog and Twitter, and developing an efficient way to track appropriate user statistics. Our Twitter analyses are also tracking mentions, retweets, and direct shares to Twitter from the blog.</p>	End of CY 2013	OPA, Holly Harrington

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3. Develop a baseline for performance by benchmarking NRC's social media metrics (i.e., viewership, subscriptions, shares, and influence) against activity within the digital nuclear industry community.	<p>Disagree</p> <p>NRC does not think that benchmarking the performance of the NRC's social media against activity within the digital nuclear industry community is appropriate for an independent, regulatory agency with a stated mission of outreach, information, and awareness to the general public. NRC expects to use the governmentwide standards now in development at GSA, which may allow us to benchmark against other Federal agencies whose mission is similar or complementary to the NRC, such as the Federal Emergency Management Agency, U.S. Environment Protection Agency, Department of Homeland Security, and U.S. Geological Survey.</p>	End of CY 2013	OPA, Holly Harrington
4. Generate content periodically that provides unique access to nuclear facilities and nuclear resources by providing photos and information.	<p>Agree</p> <p>Action—NRC will continue to generate content that offers unique access to nuclear facilities and resources, such as photographs, videos, and information to the extent appropriate for a regulator and within boundaries set to safeguard proprietary or sensitive information, equipment, and locations.</p>	End of CY 2013	OPA, Holly Harrington

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5. Make article authors more prominent by including the blog article byline at the top of each post (rather than the bottom) so readers are immediately aware of who wrote the articles.	<p>Agree</p> <p>Action—NRC initiated this change in January 2013 and explained it in this blog post: http://public-blog.nrc-gateway.gov/2013/01/03/happy-new-year-and-some-nrc-blog-updates/.</p>	Accomplished.	OPA, Holly Harrington
6. Develop and implement a process for creating more visibility into NRC’s commenting policy and periodically respond to rejected posts to build trust and transparency.	<p>Agree in Part and Disagree in Part</p> <p>Action—The blog’s comment policy is currently accessible on every page of our blog, and it has been a nonissue among the readers in the 2 year tenure of the blog. In that time, an extremely tiny minority of the more than 2,000 comments has not been posted, and NRC has received no complaints about our policy or the application of it. On the contrary, NRC has been applauded for the liberalness with which the NRC is applying its guidelines. However, NRC did choose to highlight and reiterate the policy in a blog post by the Public Affairs Director on January 3, 2013. See it here: http://public-blog.nrc-gateway.gov/2013/01/03/happy-new-year-and-some-nrc-blog-updates/. OPA also now retains a copy for our records of any comment not posted along with applicable justification (e.g., allegation, personal attack).</p>	Accomplished	OPA, Holly Harrington

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7. Rather than only soliciting input from and creating content around topics NRC departments are interested in, solicit input on a regular basis from readers and bloggers regarding content they would be most interested in (and at what level of technicality) and create content based on their input.	<p>Agree</p> <p>Action—OPA will continue to initiate posts that seek public input on topics readers would like covered in the blog. OPA also develops specific content based on feedback received through other mechanisms (e.g., public meetings, emails, and media coverage). Some examples: http://public-blog.nrc.gov/2013/01/16/improving-communication-at-the-nrc/, http://public-blog.nrc.gov/2013/01/03/happy-new-year-and-some-nrc-blog-updates/, and http://public-blog.nrc.gov/2012/08/22/taking-the-next-step-building-a-21st-century-digital-government/.</p>	Accomplished	OPA, Holly Harrington
8. Develop and implement a process for expanding tagging taxonomy beyond “nuclear” so content is labeled by audience or type of information.	<p>Agree</p> <p>Action—OPA expanded its tagging taxonomy in January 2013, added the action to the blog procedures and discussed it in this blog post: http://public-blog.nrc.gov/2013/01/03/happy-new-year-and-some-nrc-blog-updates/.</p>	Accomplished.	OPA, Holly Harrington
9. Develop and implement a process for the use of rich media including videos, photos, charts, interactive graphs, and info-graphics in social media posts.	<p>Agree</p> <p>Action—The NRC is working to expand its capability to embed additional, relevant media into its blog posts. Beginning in January 2013, the agency began expanding linking to other relevant content.</p>	Accomplished	OPA, Holly Harrington

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10. Develop and implement a process for adding visual interest and facilitating access to existing blog posts. For example, embed YouTube videos and Flickr slideshows within blog posts.	<p>Agree</p> <p>Action—OPA is maximizing opportunities to add visual interest to its blog posts.</p>	Accomplished	OPA, Holly Harrington	
11. Insert links in YouTube videos so videos are clickable and link back to www.nrc.gov, the blog, or other NRC platforms.	<p>Disagree</p> <p>As we already link to our public Web site and our blog in the video text description, we do not think that the inclusion of links in the actual video will significantly enhance access to our Web site, blog, or other platforms.</p>		OPA, Holly Harrington	
12. Conduct periodic content analysis to glean which types of posts generate the most activity and replicate blog elements that have proven successful.	<p>Agree</p> <p>Action—With the hiring of a social media specialist, OPA is maximizing the use of built-in analytical features of our existing social media platforms to gauge the interest in various types of content, including the number of Facebook “shares,” likes, and tweeting occurring on posts. OPA would consider future use of third-party, GSA approved analytics software to the extent such use will benefit our efforts to produce the most interesting content for our targeted audience.</p>	Accomplished	OPA, Holly Harrington	

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13. Develop and implement a process for expanding photo offerings on Flickr beyond bar graphs or the NRC Chairman.	<p>Disagree in Part and Agree in Part</p> <p>Action—OPA disagrees with the characterization of the content on Flickr. There are more than 1,100 images on the agency’s Flickr page; the vast majority of photographs are not of the NRC Chairman. OPA agrees that it will continue to expand photo offerings on Flickr with new photographs added weekly. A backlog of photos to be migrated from the old photo gallery to Flickr is ongoing as workload resources allow.</p>	Accomplished	OPA, Holly Harrington	
14. Allow and respond to user comments on NRC YouTube and Flickr sites rather than directing them to the NRC blog.	<p>Disagree</p> <p>OPA believes the current system of driving traffic to the very-well-received blog is the best use of social media at this time, a belief supported by other Government social media experts who applaud the success and vitality of the NRC blog. OPA will, however, monitor feedback on the subject and periodically reconsider this approach, particularly if OPA is able to expand the content on the agency’s YouTube site to the extent that opening comments on that platform becomes appropriate.</p>		OPA, Holly Harrington	

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15. Develop and implement a process for identifying digital influencers and monitoring activity by maintaining a matrix of influencers according to shifting scores and activity.	<p>Agree</p> <p>Action—OPA has, in the past, exercised specific outreach to bloggers and other social media content providers who have an interest in nuclear or regulatory topics related to the NRC. In addition to considering nontraditional media as part of our normal media outreach, OPA also continue to consider, when appropriate, specific outreach to nontraditional media, such as blogger’s roundtables.</p>	Accomplished	OPA, Holly Harrington
16. Develop and implement a process for determining what information each user group needs and regularly provide that information on NRC’s blog and in NRC’s Twitter feed.	<p>Agree</p> <p>Action—With the hiring of a social media specialist, OPA is maximizing the use of built-in analytical features of our existing social media platforms to gauge interest in various types of content, including the number of Facebook “shares,” likes and tweeting occurring on posts. OPA is also using the analytics in Twitter to monitor retweets and mentions to measure interest and inform future tweets and posts.</p>	Accomplished	OPA, Holly Harrington

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17. Engage in active outreach to bloggers and other social media followers by providing special opportunities to connect with NRC staff, such as tailored content, virtual or physical meet and greets, and discussions.	<p>Agree</p> <p>Action—As part of its second phase for the agency’s social media program, OPA is proposing the launch of a pilot live discussion platform from which social media followers can meet and participate in real-time dialogue with members of the NRC staff on various topics of high public and media interest. The live discussion tool would also offer a unique opportunity to further tailor content to user or follower preferences based on participant feedback and the popularity of specific discussions. During the 6 month pilot, the NRC anticipates holding approximately 10 live chats on topics including hurricane preparedness, seismic studies related to nuclear power plants, and NRC activities related to the Japanese nuclear incident of 2011.</p>	Launch April 2013.	OPA, Holly Harrington
18. Develop and implement a process for regularly hosting brown bags or other training classes to build awareness of NRC social media activities.	<p>Agree</p> <p>Action—OPA will continue its program of conducting presentations about social media to program offices throughout the agency, including expanding these presentations to all four regional offices in 2013. OPA has formed a Social Media Champions Certificate program to aggregate agency-wide support for the social media program.</p>	Accomplished	OPA, Holly Harrington

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19. Evaluate all of OPA's published materials and make sure information on how social media can be accessed by users is clearly defined and visible.	<p>Agree</p> <p>Action—Upon the need to reprint, OPA is working with the graphics department to ensure our social media branding is visible on published material. OPA will continue to review existing printed and electronic materials as well as future publications to ensure social media branding is considered.</p>	Accomplished	OPA, Holly Harrington
20. Periodically host a blogger’s roundtable where NRC invites prominent nuclear bloggers to opine on key issues. This can be done either in person or virtually through forums such as Google Communities.	<p>Agree</p> <p>Action—These have been conducted in the past and, when appropriate and part of a communications strategy, will be used again, along with the new live chat platform and various Webinars held regionally on specific issues.</p>	Accomplished	OPA, Holly Harrington
21. Monitor, note, and engage frequent posters, commenters, and active Twitter followers.	<p>Disagree in Part and Agree in Part</p> <p>OPA already monitors all blog comments and has begun reviewing retweets and mentions of the NRC in other tweets. Our upcoming chat platform will allow engagement with the public and those actively following NRC social media. The NRC as a whole also offers ample opportunity for those interested in NRC business to participate in dialogue through public meetings, Webinars, and other venues. We believe this level of engagement is sufficient.</p>	Accomplished	OPA, Holly Harrington

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22. Develop and implement a process to evaluate and monitor NRC’s influence scores quarterly to capture and understand existing user sentiments, behavior, and awareness.	<p>Disagree</p> <p>The NRC is an independent, regulatory Federal Government agency with a stated mission of openness and transparency in its regulatory process, which must be strictly conducted in the absence of any appearance of influence from those we regulate as well as anyone who may have a stake in our regulations, including the Executive Branch of the Government, commercial vendors, foreign countries, and members of the media. Seeking to influence is neither a goal of the NRC as a whole nor of its social media programs specifically, which are only intended to raise awareness, provide information, and promote dialogue. “Digital influence scores” are not an appropriate measure for the NRC.</p>		OPA, Holly Harrington

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23. Develop and implement a process to evaluate how NRC’s score rises or falls dependent on a rise in readership or engagement and adjust strategies depending on outcome.	<p>Disagree</p> <p>The NRC is an independent, regulatory Federal Government agency with a stated mission of openness and transparency in its regulatory process, which must be strictly conducted in the absence of any appearance of influence from those we regulate as well as anyone who may have a stake in our regulations, including the Executive Branch of the Government, commercial vendors, foreign countries, and members of the media. Seeking to influence is neither a goal of the NRC as a whole nor its social media programs specifically, which are only intended to raise awareness, provide information, and promote dialogue. “Digital influence scores” are not an appropriate measure for the NRC.</p>		OPA, Holly Harrington

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24. Develop and implement a process to solicit feedback from digital influencers about what they see are trends, preferences and needs in information and content within the digital nuclear community.	<p>Disagree</p> <p>The NRC is an independent, regulatory Federal Government agency with a stated mission of openness and transparency in its regulatory process, which must be strictly conducted in the absence of any appearance of influence from those we regulate as well as anyone who may have a stake in our regulations, including the Executive Branch of the Government, commercial vendors, foreign countries, and members of the media. OPA will continue to solicit input from the public and other stakeholders regarding content using processes already in place, such as public meetings, blogger’s roundtables, live chat, blog comments, etc. Singling out so-called digital influencers for special access is counter to the NRC’s mission of outreach, transparency, and openness to the public as a whole.</p>		OPA, Holly Harrington

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<p>25. Update the agency's information management and security policies to include social media.</p> <p>A) Include social media policy guidance in the revised MD 3.2 – Privacy Act in accordance with guidance provided in OMB Memorandum 10- 23, <i>Guidance for Agency Use of Third Party Web Sites and Applications</i>.</p> <p>B) Revise MD 3.53, Records and Document Management Program and include social media in accordance with the guidance provided in NARA Bulletin 2011-02, <i>Guidance on Managing Records in Web 2.0/Social Media Platforms</i>.</p> <p>C) Revise the existing PII Breach Notification Policy and Computer Security Incident Response Policy to include the following statement: <i>All of the information contained in this policy applies to the use of social media</i>.</p>	<p>Agree</p> <p>A) As MDs are updated, the Office of Information Services (OIS) will seek to properly incorporate social media guidance as appropriate.</p> <p>B) As MDs are updated OIS will seek to properly incorporate social media guidance as appropriate.</p> <p>C) OIS will look to add the verbiage specified.</p>	Quarter 3 of FY 2014	OIS, Edwin Leong
<p>26. Conduct annual security and vulnerability assessments of NRC's social media channels. CSO should outline the requirements to perform the assessments and facilitate the process.</p>	<p>Agree</p> <p>Action—CSO will outline the requirements to perform the assessments and facilitate the process.</p>	Sept 30, 2013	CSO, Shalom Nevet
<p>27. Develop a section on social media security for inclusion in the annual mandatory Computer Security Awareness Course. Include information on Federal and NRC social media policies and employee responsibilities to safeguard PII and sensitive agency information when using social media inside and outside of the NRC network.</p>	<p>Agree</p> <p>Action—The Computer Security Awareness Course (CSAC) includes social networking information. The course content explains the importance of guarding online privacy and protecting the organization.</p>	Accomplished	CSO, Judy Petsch

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28. Develop a section on social media security for inclusion in the OPA social media training for all official NRC bloggers. Include an overview of social media security and Federal and NRC social media policies, as well as guidelines regarding employee responsibilities to safeguard PII and sensitive agency information when developing posts for the NRC blog.	<p>Disagree</p> <p>Social media-related concerns are covered by the NRC's CSAC as provided by CSO. Every employee of the NRC, including all NRC bloggers and moderators are already required to take this training annually.</p>		OPA, Holly Harrington
29. Disseminate electronic agencywide Yellow Announcements on a periodic basis regarding social media security, NRC-approved social media sites and the responsibilities of employees to safeguard PII, sensitive agency data, and proprietary information when using social media sites inside and outside of the NRC network.	<p>Agree</p> <p>CSO works with other NRC offices to disseminate Yellow announcements to convey policy; network announcements and articles. In addition to using Yellow Announcements as a means to communicate policy, various newsletters, such as the spring 2011 Frontline and the entire March 2012 Security Newsletter were devoted to social networking (media). To better highlight social media, the annual announcement of the computer security awareness course will include a reminder to be aware of social media security and to safeguard PII, sensitive agency data, and proprietary information when using social media sites inside and outside of the NRC network. The announcement will also state that these topics are addressed in the course.</p>	January 2014	CSO, Judy Petsch

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<p>30. Revise warning messages for network users:</p> <p>A) Revise warning message for users that attempt to access approved social media sites to indicate that any postings they make must comply with Federal and NRC social media policies and that they are responsible for safeguarding the personally identifiable information of themselves, fellow employees and members of the public.</p> <p>B) Revise the warning message to users and visitors who attempt to access approved social media sites via the NRC Intranet site and public facing website to indicate that activity on NRC social media sites is monitored by the Agency and subject to NRC policies.</p>	<p>Agree</p> <p>Action—OIS will update the messages to reflect the recommended language.</p>	4th quarter FY 2013	OIS, Edwin Leong
<p>31. Revise the Problem Report to include a link to the Interim Guidance on the Use of Social Media.</p>	<p>Agree</p> <p>Action—OIS will update the report to include a link.</p>	4th Quarter FY 2013	OIS, Edwin Leong
<p>32. Include social media security articles in the IT Security Awareness Newsletter, which is published and disseminated by the Computer Security Office (CSO) on a quarterly basis.</p>	<p>Agree</p> <p>Action—CSO included social networking media in the March 2012 newsletter, and CSO will continue to include social media as appropriate in periodic updates to the IT Security Awareness Newsletter.</p>	Accomplished.	CSO, Judy Petsch
<p>33. Establish a social media governance structure including representatives from the OGC, CSO (Policy Standards and Training Team, Cyber Situational Awareness, Analysis and Response Team), OIS (ICOD, Enterprise Architecture Team, Records and Archives Services Section, FOIA/Privacy Section) and OPA, and convene periodic meetings to guide NRC policies and practices around social media content, security, privacy, and records management.</p>	<p>Agree in Part and Disagree in Part</p> <p>Action—OPA already has “The Communications Council,” which is the primary vehicle for agencywide discussions of communications issues, including social media. OPA has created a Social Media Champions Certificate Program to help foster discussions specific to social media.</p>	Accomplished	OPA, Holly Harrington

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34. Develop an SOP to track, monitor, and escalate to other NRC offices, comments posted on the NRC blog that do not adhere to NRC policies.	<p>Agree in Part/Disagree in Part</p> <p>Action—The blog’s comment policy is currently accessible on every page of our blog, and it has been a non-issue among the readers in the two-year tenure of the blog. In that time, an extremely tiny minority of the more than 2,000 comments has not been posted, and we have received no complaints about our policy or the application of it. On the contrary, we have been applauded for the liberalness with which the NRC is applying its guidelines. However, we did choose to highlight and reiterate the policy in a blog post by the Public Affairs Director on January 3, 2013. See it here: http://public-blog.nrc-gateway.gov/2013/01/03/happy-new-year-and-some-nrc-blog-updates/. OPA also now retains a copy for our records of any comment not posted along with applicable justification (e.g., allegation, personal attack).</p>	Accomplished	OPA, Holly Harrington