


Title:	Social Media
Policy #:	20-COM-04
Subsequent Procedure(s)	N/A
Legal Reference:	R.C. 3304.15, 3304.16; Executive Order 2023-03D; DAS/OIT IT-04 "Use of Internet, E-mail and Other It Resources"
Effective Date:	June 3, 2024
Approved:	Kevin L. Miller, Director 
Origin:	Office of Communications
Supersedes:	20-COM-04 (03/25/24)
History:	20-COM-04 (02/28/22, 12/09/19)
Review/ Implementation	Begin Review – 09/08/25 Implement Revisions By – 03/09/26

I. AUTHORITY

This policy, and if necessary subsequent procedures, are issued in compliance with Ohio Revised Code (R.C.) 3304.15 and 3304.16 which establishes the power and authority of Opportunities for Ohioans with Disabilities (OOD) and its Executive Director to develop all necessary rules, policy and procedure in furtherance of its statutory duties.

II. PURPOSE

The purpose of this policy is to provide guidelines for the proper use of social media in accordance with appropriate federal (e.g., Code of Federal Regulations [C.F.R.]) and state law (i.e., Ohio Revised Code [R.C.], Ohio Administrative Code [Ohio Adm.Code]), Governor directives and executive orders, other governing agency (e.g., DAS, OBM) policy or guidance, and/or the Director expectations.

III. APPLICABILITY

This policy applies to all employees, contractors and temporary personnel.

IV. DEFINITIONS

Blogs – websites with dated items of content in reverse chronological order, self-published by bloggers (owners of content), and posts may have keyword tags associated with them, are usually available as feeds and often allow commenting.

Copyrighted Material – includes materials that may be protected by intellectual property law (e.g., a cartoon, article or excerpt from a book). In other words, if the information or material is copyrighted, it may not be publicly circulated without prior authorization from the copyright holder.

Feeds – means by which you can read, view or listen to items from blogs and other RSS-enabled sites without visiting the site, by subscribing and using an aggregator or newsreader.

Photosharing – uploading of images to a website (e.g., Flickr, Snapchat or Instagram) that allows adding tags and offering people the opportunity to comment or even reuse your photos if you add an appropriate copyright license.

Podcast – audio or video content that can be downloaded automatically through a subscription to a website or app so you can view or listen offline.

Post – an update from a social media user, or a comment made to another user’s social networking page or site.

Really Simple Syndication (RSS) –a web feed which allows subscribers to receive content from blogs and other social media sites.

Record – per R.C. 149.011, records are work-related documents and recordings.

Social Networking – use of a variety of websites that allow users to share content, interact and develop communities around similar interests.

Social Media – various forms of websites and applications through which users and organizations use online communities (e.g., Twitter/X, Facebook, LinkedIn, YouTube, Instagram) to share information, ideas, personal messages and other content (e.g., videos), collaborate/network and leverage for business development and organization.

Social Media Account Holder – an employee, contractor, or temporary personnel who has received approval to post to OOD social media accounts.

Social Media Administrator – an OOD employee within the Office of Communications assigned to manage social media.

Tags – keywords added to a social media post, photo or video to help users find related topics or media. Sometimes known as “hashtags.”

Terms of Service (TOS) – rules by which one must agree to abide by in order to use a service. It is generally assumed such terms are legally binding.

Wiki – a webpage or set of pages that is created by the Wiki owner and once given permission approved contributors can edit or create additional pages from anywhere in the world (e.g., Wikipedia).

V. POLICY

A. General

1. All OOD policies, procedures, and associated attachments can be found by accessing the [“Policies”](#) webpage and searching for the policy name or number.
2. The Director of Opportunities for Ohioans with Disabilities (OOD), along with the Chief of Communications, Chief Information Officer and Chief Legal Counsel, shall develop, implement and maintain a coordinated statewide plan for OOD social media, including formulating policies to achieve OOD’s mission and guiding principles.
3. OOD’s goal is to actively engage and expand its reach through social media, ensuring the appropriate and effective use of platforms to share valuable information. This includes fostering outreach efforts to connect with new individuals and serve a broader audience for the mutual benefit of OOD and those it supports.



B. Use of Personal Social Media Accounts

1. Employees, contractors, and temporary personnel may have personal social media accounts; however, there are certain prohibitions when posting statements related to OOD. The items listed below are prohibited.
 - a. Making statements on behalf of OOD without permission.
 - b. Making statements that may be perceived as representing the official OOD position or policy on a particular situation.
 - c. Making statements that disclose the identity of our applicants, eligible individuals or claimants (past or present), compromise our security, reveal trade secrets or provide tips based on inside information.
 - d. Using state email accounts or passwords in conjunction with a personal social media site.
2. Employees, contractors, and temporary personnel may:
 - a. access their personal social media during scheduled lunch periods, in accordance with “Use and Security of IT Resources, Including State Telephones” (60-ITG-01-02); and
 - b. re-post/share social media posts distributed by OOD social media accounts on their personal social media account.

C. OOD Social Media Accounts Oversight

1. The Director shall appoint a Social Media Administrator (SMA) in the Office of Communications.
 - a. The SMA, or designee, shall maintain a listing of approved OOD Social Media Account Holders”.
2. Due to the highly sensitive nature of some of the services rendered by OOD and the confidential data maintained, all social media accounts, social media management platforms, and paid subscription services must have, at a minimum, a primary and secondary administrator to administer and monitor the accounts for action to be taken quickly to correct any data that was published in error.
 - a. The SMA shall have administrative rights for all OOD social media accounts, social media management platforms, and paid subscription services.

D. Approval and Subsequent Requirements for Access to OOD Social Media Accounts

1. Approval for the establishment of an additional OOD social media account(s), to promote a particular program area, by a division/bureau or an employee, contractor, or temporary personnel approval shall be obtained from the divisional Deputy Director or designee, and shall be based on business reasons, taking into consideration OOD’s mission, guiding principles and the potential benefits for OOD.
2. In order to request access to an OOD social media account, the “Request for Social Media Access” form (20-COM-04.A) shall be completed and submitted, via email, to the appropriate Deputy Director, or designee, for initial approval.



**Opportunities for
Ohioans with
Disabilities**

- a. Upon their approval, the Deputy Director, or designee, shall forward to the Chief of Communications, or designee for final approval.
 - i. The Chief of Communications, or designee, shall notify the requestor of the determination made.
 - ii. Upon approval, the authorized individual (herein referred to as a “Social Media Account Holder” (SMAH), shall be scheduled for training by the Office of Communications. Training must be completed prior to the SMAH obtaining administrative rights to the social media account.
3. Due to the sensitive nature of some of the services provided through OOD and to promote consistency in the ability to communicate, an approved individual shall never use their regular, day-to-day personal email account to establish a social media account for OOD.
 - a. The SMA shall request the Division of Information Technology create a program-specific, OOD email address to use in conjunction with the social media account.
 - b. The SMAH shall use the email address and password provided by the SMA for the purpose of accessing the social media account. This email address and its contents are subject to all law, policies, and procedures as any other OOD email address.
 - c. The SMAH shall be responsible for monitoring this email account on a regularly defined basis, at least one (1) time per week.
4. The SMAH shall set up their account including, but not limited to the items listed below.
 - a. Utilizing the OOD program name, not their actual name or pseudonyms, when setting up the account. However, because an actual name will be used:
 - i. do not assume privacy, only share information for which the SMAH is comfortable disclosing; and
 - ii. use different passwords for different accounts, including existing work accounts to decrease the chances of accounts being compromised.
 - b. Ensuring the SMA:
 - i. has administrator rights;
 - ii. is provided all passwords and is notified ahead of time of any password changes; and
 - iii. is provided all administrator names (primary and secondary).
5. All SMAHs should familiarize themselves with the most current terms of service (TOS) of each form of social media. Each form has their own unique TOS which regulate how users interact.
 - a. If a SMAH thinks a TOS contradicts State/Federal law or OOD policy, then they shall contact the Division of Legal Services and the SMA or the Chief of Communications in order for a decision to be made about whether use of that social media is appropriate.

E. Social Media Posting and Monitoring

1. Any OOD employee, contractor or temporary personnel who would like to suggest social media posts shall contact the SMA.
2. The SMA and SMAH shall be responsible for the items listed below.
 - a. Always keeping their personal and professional lives separate when administering OOD social media sites.
 - b. Monitoring their OOD social media account(s) including, but not limited to, incoming messages from constituents and comments on agency posts.
 - i. Any message from a constituent shall be forwarded to the appropriate divisional staff within 24 hours or no later than the following business day.
 - c. Using extreme care, discretion, and planning when posting or communicating on behalf of OOD. This includes the following, but is not limited to, items listed below. If, at any time, a SMAH is uncertain about whether material should be posted, they should contact the SMA or in absence Chief, Office of Communications. If the SMA is uncertain about whether material should be posted, they should contact the Chief, Office of Communications.
 - i. Ensuring that all agency-related communication posted on social media accounts is professional, respectful, and conducted in accordance with OOD policies, procedures and expectations.
 - ii. Material posted online is not private and should be viewed as though it were a response to a news media request that would be shared with the general public.
 - a) If the material or comment being considered for online posting is not something that would be shared with the general public or news media, then it should not be posted.
 - b) Search engines can turn up posts years after they are created.
 - c) Posts can be easily forwarded or copied.
 - d) Posts can become widely known and may reflect on both the individual posting the material and OOD.
 - iii. Care shall be taken to avoid violating trademark, patent and copyright laws, to respect intellectual property rights, and to reference or cite sources appropriately.
 - iv. Logos, seals, trademarks, photos and other pictures, other than those owned by the state of Ohio, may not be used in materials or posts that are modified or newly created by OOD, without written consent from the organization.
 - a) These items may only be used when reposting information directly from another organization's information, without changes.



Opportunities for Ohioans with Disabilities

- d. Prior to posting content to any OOD social media account(s), the SMAH shall submit the proposed posts to the SMA, or in their absence the Chief of Communications, for approval.
- e. Social media reports will be generated on a monthly basis, providing a comprehensive overview (e.g. engagement rates, follower growth, impressions) of agency social media performance during the reporting period.
- f. Social Media Account Materials and Comments are Public Records
 - i. Materials and comments located on OOD social media accounts is a public record, which means that both the posts themselves and any feedback by other individuals (OOD or Non-OOD), including citizens, will become part of the public record.
 - ii. If a comment or post made on an OOD social media account must be removed for any reason (e.g., comment or post contains profanity, libelous content, personal information, other content deemed inappropriate), the OOD SMA may remove the content.
 - a) Prior to hiding or deleting the content, the OOD SMA must first make a lasting record of the content by capturing a “screenshot” image of the comment or post in question and saving that screenshot in a desktop file for a minimum of two (2) months, per the Office of Communications’ retention schedule (refer to “Records Management” [70-RM-02]).
 - b) In consultation with the Division of Legal Services, the OOD SMA may ban or block repeat or egregious offenders in accordance with OOD’s posted social media terms and conditions.
- 3. Upon receipt of a constituent message (refer to Section C.3.b.), the SMA shall respond within 24 hours or the next business day.
- 4. The Chief of Communications shall review social media content on OOD social media sites on a quarterly basis to ensure that confidential personal information (CPI) is not posted and that only approved posts have been published.

F. Acceptable and Unacceptable Use

- 1. The use of social media by employees, contractors and temporary personnel shall be consistent with applicable state, federal and local laws, regulations and policies, including OOD policies and procedures including, but not limited to: information technology, confidentiality, and records management (i.e., retention, disposal).
 - a. Per Executive Order 2023-03D, OOD shall not use social media applications, channels, and platforms that are owned by an entity located in China. (e.g., TikTok, Tencent QQ, Tencent Video, QQ International (QQi), Qzone, WeChat, Weibo, Xiao HongShu, Zhihu, Meituan, Toutiao, Alipay, Xiami Music, Tiantian Music, DingTalkfDing Ding, Douban, RenRen, Youku/Tudou, Little Red Book, and Zhihu).
 - b. Use of OOD Social Media Accounts
 - i. OOD social media accounts shall not be used for:
 - a) political purposes;

- b) conducting personal commercial transactions;
 - c) engaging in activities for personal gain or business; or
 - d) posting offensive language, discriminatory remarks, or personal attacks.
- ii. All OOD social media activities must pertain to OOD's objectives, programs, and services, ultimately supporting the agency's mission.
- a) During the use of OOD social media accounts, authorized OOD staff:
 - 1) must understand that all images and comments posted to social media may influence public perception of both OOD and the state of Ohio;
 - 2) must be respectful of the agency, other state agencies, state leaders, state employees, customers, partners, vendors, citizens and the public;
 - 3) shall ensure postings are clear, accessible, professional, accurate and ethical; and
 - 4) shall not post any of the items listed below:
 - 1.1 information, photos, links or other items online that would reflect negatively on any individual, the agency or the state;
 - 1.2 sensitive internal information; or
 - 1.3 any confidential personal information (CPI) pertaining to OOD or its employees, clients or other stakeholders, as stated in "Accessing and Securing Confidential Personal Information" (70-GL-02).
- iii. Security and Privacy
- a) OOD shall not collect information from social media accounts for commercial marketing.
 - b) OOD postings to social media accounts, including blogs and forums, shall comply with all agency policies and procedures.
 - 1) Information posted to an OOD social media account is public record and therefore any information that OOD is required by statute to protect from public dissemination (e.g., CPI) is not permitted to be posted to a social media account.
 - 1.1 OOD shall not post anything that involves the communication of CPI or sensitive internal information on a social media account.
 - 1.2 OOD shall not ask for CPI or sensitive internal information to be provided via social media sites.

- 1.1.1 Refer to “Access and Securing Confidential Personal Information” (70-GL-02) for specific direction on the responsibility for security and privacy incidents including breach notification requirements.

c) Monitoring of Posts by External Entities

- 1) If anyone visiting an OOD social media site chooses to provide personal information in a non-public way (e.g., completes a “Contact Us” form), the SMA shall:
 - 1.1 only use that information to respond to the message or request; or
 - 1.2 only share the information with another OOD program area or government agency if the inquiry relates to that program area or agency, or as otherwise allowed or required by law.
- 2) If anyone visiting an OOD social media site chooses to provide personal information (e.g., case number, SSN), in a publicly visible post on an OOD social media site, upon discovery, the SMA shall immediately log the date, the social media account, and a description of the post or comment and retained per “Records Management” (70-RM-02) prior to hiding or deleting the post or comment, if permissible by the social media site.
 - 2.1 The SMA shall forward any information, as necessary, to the appropriate subject matter expert for any required follow-up about the information posted.
- 3) OOD social media administrators must not give personal information to any private organizations.

iv. Social Media Marketing Plans

- a) If any employee, bureau, or office is interested in using social media for business-related marketing, a marketing plan must be developed and presented to the Office of Communications.
 - 1) The marketing plan must address why they are interested in having a social media presence and the benefits of doing so for their program or area and shall:
 - 1.1 identify targeted individuals and planned strategies, including but not limited to information strategies;
 - 1.2 identify management resources, internal teams, external management resources (e.g., contractors) and human resource needs to monitor usage, analyze information trends and prepare responses to assist with identifying future training requirements and needed outreach efforts; and
 - 1.3 explain the social media account’s value to the citizens of Ohio.

- 20-COM-04.A Request for Social Media Access

RESOURCES

- 70-RM-02 Records Management
- 70-GL-02 Accessing and Securing Confidential Personal Information
- 60-ITG-01-02 Use and Security of IT Resources, Including State Telephones
- 50-LR-15 Discipline Policy, 50-LR-15.A Discipline Grid

REVIEW

It is the responsibility of the Deputy Director, or designee, to review this policy, on or before, the date listed in the header and if applicable, make any necessary revisions. The Deputy Director, or designee, shall document the review as required in "Policy and Procedure Process" (10-ADM-01).