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Description of document: Export-Import Bank of the United States (Ex-Im Bank)
Social Media Policy, 2015

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Export-Import Bank of the United States
Freedom of Information and Privacy Office
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Washington, D.C. 20571
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[Online Freedom of Information Act Request Form](#)

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Reducing Risk. Unleashing Opportunity.

July 28, 2020

Via Electronic Mail

Re: FOIA Request # 202000071F

This is the final response to your Freedom of Information Act (FOIA) request to the Export-Import Bank of the United States (EXIM Bank). We received your request in our FOIA Office via the National FOIA Portal on July 27, 2020. You requested “the EXIM Bank Twitter Clearance Process/Policy and the Social Media Clearance Process/Policy for posting content on the agency's Twitter or other Social Media accounts.”

We conducted a comprehensive search of the files within the Office of Ethics, FOIA Department for records that would be responsive to your request. The search produced the attached records. After carefully reviewing the responsive documents, we have determined they are releasable in their entirety; no deletions or exemptions have been claimed. For your convenience, we are attaching the documents to this message as an PDF file.

For your information, Congress excluded three discrete categories of law enforcement and national security records from the requirements of the FOIA. See 5 U.S.C. §552(c) (2006 & Supp. IV 2010). This response is limited to those records that are subject to the requirements of the FOIA. This is a standard notification that is given to all of our requesters and should not be taken as an indication that excluded records do, or do not, exist.

EXIM Bank’s FOIA regulations at 12 C.F.R.404.9 (a) state that EXIM Bank shall charge fees to recover the full allowable direct cost it incurs in processing request. In this instance, because the cost is below the minimum, there is no charge.

I trust that this information fully satisfies your request. If you need further assistance or would like to discuss any aspect of your request please do not hesitate to contact our FOIA Public Liaison, Ms. Lennell Jackson at (202) 565-3290 or by E-Mail at Lennell.Jackson@exim.gov.

Sincerely,

LISA TERRY

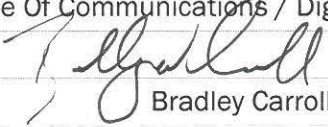
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LISA TERRY
Date: 2020.07.28
08:57:55 -04'00'

Lisa V. Terry
Chief FOIA Officer

Attachment: Responsive Documents (1 PDF file)



EXIM Bank Social Media Policy

Source:	Office Of Communications / Digital Engagement	Version:	1.0
Approved:	 Bradley Carroll	Effective:	12/15/2015
Title:	Senior Vice President for Communications	Review:	

1 POLICY

1.1 Purpose

The purpose of this policy is to provide guidance to Export-Import Bank (hereafter "EXIM Bank" or "Bank") employees on official and personal use of social media technology. This policy addresses proper use of social media tools and social networking services by Bank employees, both in their personal capacity or in any official capacity as representatives of EXIM Bank.

This policy further serves as a tool for preventing misuse or unauthorized use of social media and to remind Bank employees (including contractors and non-federal employees such as student interns, fellows and volunteers) of their personal and professional responsibilities when using social media. EXIM Bank employees engaging in social media must take care to do so in an authorized, non-discriminatory, sensitive, and appropriate manner as outlined in this policy.

1.2 Background

President Obama's Memorandum on Transparency and Open Government, issued on January 21, 2009, encourages Federal agencies to use technology to communicate and engage with the public. In response, OMB's 2009 Open Government Directive outlines specific actions for implementing principles that support greater interaction and collaboration with the public, including the use of social media, and web-based interactive technologies as a means to becoming more transparent, participatory and collaborative.

The Bank recognizes the opportunity and potential of social media to further its mission and provide better transparency and service to its stakeholders as well as the general public. The Bank also understands that participation on social media platforms for personal use is commonplace and widespread.

1.3 Policy Statement

It is the policy of EXIM Bank to ensure that its use of social media is consistent with its commitment to openness and transparency. The Bank's communication and engagement goals, however, must be effectively balanced with protecting other interests, such as privacy, protection against harassment, information security, records management, and Section 508 access for persons with disabilities in

the use of social media.

Employees are expected to conduct themselves professionally in the workplace and may not use government office equipment for social media activities that are illegal, inappropriate, or offensive to fellow employees or the public, including, but not limited to offensive speech based on race, color, religion, sex, national origin, age, or disability.

2 AUTHORITY

2.1 Authorities for this policy include:

- 2.1.1 [President Barack Obama Memorandum, "Transparency and Open Government," January 21, 2009](#)
- 2.1.2 [Director Peter R. Orszag memorandum, OMB M-10-06, "Open Government Directive," December 8, 2009](#)
- 2.1.3 [Director Peter R. Orszag memorandum, OMB M-10-23, "Guidance for Agency use of Third-party Websites and Applications," June 25, 2010](#)
- 2.1.4 [Rules of Behavior for Users of Ex-Im Bank's Information Systems \(hereinafter referred to as "Rules of Behavior"](#)
- 2.1.5 ["Limited Personal Use" of Government Office Equipment Including Information Technology \(hereinafter referred to as "Limited Personal Use"\)](#)
- 2.1.6 [Ex-Im Bank "Records Management Program Policy," June 5, 2015](#)
- 2.1.7 [EXIM Bank Anti-Harassment Policy Statement, April 22, 2013](#)
- 2.1.8 [Guidelines for Securing Sensitive Ex-Im Bank Information and Systems](#)
- 2.1.9 [EXIM Bank, EXIM.gov Privacy And Security Policy](#)
- 2.1.10 [U.S. Office of Government Ethics 5 C.F.R. Part 2635: Standards of Ethical Conduct for Employees of the Executive Branch \(hereinafter, "Standards of Conduct"\)](#)
- 2.1.11 [United States Office of Government Ethics-The Standards of Conduct as Applied to Personal Social Media Use, April 9,2015](#)
- 2.1.12 [The Hatch Act of 1939, 5 U.S.C. §§ 7321-7326](#)

2.2 **Review Cycle** for this policy shall be annually.

2.3 Review History

Date	Changes
XX-XX-15	<ul style="list-style-type: none"> • Policy established

3 DEFINITIONS

3.1 **Employees:** For purposes of this policy, "employees" include all EXIM Bank staff, including contractors and non-federal employees such as student interns, fellows and volunteers.

- 3.2 **Official Use:** Use of social media to present official messages of EXIM Bank. Includes both the official social media accounts of EXIM Bank managed by the Office of Communications (currently Twitter, LinkedIn, YouTube, and any other official EXIM Bank accounts activated after this policy takes effect), as well as Official Spokesperson accounts designated by the Office of Communications.
- 3.3 **Spokesperson Users:** Employees who have been specifically designated by the Office of Communications to manage individual social media accounts for official use. (i.e., a Twitter account for the EXIM Press Secretary to present official messages of EXIM Bank).
- 3.4 **Personal Use:** Strictly personal use of social media in an employee's personal capacity.
- 3.5 **EXIM Bank "voice":** Use of social media with a level of authority reserved for official EXIM Bank social media accounts or Spokesperson accounts. For example, posting non-public information which allows the public to draw specific conclusions about the Bank's stance on a particular issue would be considered speaking with the Bank's voice.

4 SCOPE AND APPLICATION

- 4.1 **This Policy applies** to all Bank employees, including contractors and non-federal employees such as student interns, fellows and volunteers, who are active on any external or internal social media platforms, such as Twitter, Facebook, or forums hosted on EXIMCONNECT.
- 4.2 This policy does not supersede or replace any existing legal responsibilities and/or EXIM Bank policies, including the Rules of Behavior Limited Personal Use Policy, and Records Management Program policies, and serves to supplement other existing workplace guidelines.
- 4.3 This policy is subject to changes in social media technology as well as subsequent guidance issued by the Office of Government Ethics, and will be updated to reflect such changes. To the extent this policy conflicts, or appears to conflict, with any of the underlying authorities, the underlying authorities will prevail.
- 4.4 The policy applies to those categories of social media to which this policy applies include, but are not limited to:
 - **Video/Photo Sharing** – YouTube, Vimeo, Instagram, Flickr
 - **Blogging/Microblogging** – WordPress, Blogspot, Twitter, Tumblr
 - **Social Networking** - Facebook, LinkedIn
 - **Social Bookmarking** – Reddit, Pinterest
 - Other blogs, message boards and discussion forums

This policy also applies to social media properties that currently exist on, or may be introduced to, EXIM Bank's intranet, EXIMCONNECT.

- 4.5 **Exception:** This policy does not apply to use of social media by the Office of the Inspector General in the course of its operations.

5 RESPONSIBILITY

- 5.1 **The Senior Vice President (SVP) of Communications** in the Office of Communications, or his/her designee is responsible for implementation and administration of this policy. The SVP of

Communications is specifically authorized to make determinations as to which social media platforms may be used on behalf of the Bank.

- 5.2 **The Office of Communications** grants approval for participation in social media on behalf of the Bank, including Spokesperson Users, assigns discussion forum owners, and maintains a listing of all official presences on third-party social media sites. The Office of Communications is also responsible for enforcement, oversight, and management of official social media accounts.
- 5.3 **The Office of the Chief Information Officer, Division of Information Management and Technology (IMT)** leads efforts to protect and secure sensitive information and systems and supports business operations for Bank-sponsored social media forums including design, setup, and launch through the IMT Webteam.
- 5.4 **The Office of General Counsel, Office of Ethics** provides legal advice relating to the Bank's business and operations, including ethics considerations related to social media use.

6 PROCEDURES

- 6.1 **Official EXIM Bank social media accounts** are exclusively reserved to the Office of Communications to actively operate in the social media space on behalf of the Bank. At the time of this policy's publication, three external social media platforms are in official use by the Bank: YouTube (EximBankofUS), Twitter (@eximbankus) and LinkedIn (export-import-bank-of-the-united-states). Only specifically authorized employees within the Office of Communications may operate official EXIM Bank accounts. Their activities are strictly governed by specific short-, medium-, and long-term initiatives and Bank-wide communications strategies.
- 6.2 **Spokesperson User Accounts**
 - 6.2.1 **Requests for Spokesperson User accounts.** Spokesperson User accounts, on any platform, must be approved by the Office of Communications. Spokesperson accounts must be requested in writing, have advanced approval from the requester's SVP, and include a short explanation on the purpose of the request, proposed topics of communication, and description of the content to be posted. Requests must be submitted to the SVP of Communications at least 30 days prior to the requested account activation date and will be approved at the discretion of the Office of Communications.
 - 6.2.2 **Account Requirements.** Once approved, Spokesperson User accounts are subject to the following criteria:
 - Must be a new account specifically approved by the Office of Communications and managed by the approved spokesperson for the purpose of spokesperson activities;
 - Must be associated with an EXIM Bank email address;
 - Must include a prominently displayed statement on the account profile that the account is for the purpose of disseminating specific information about the Bank;

and

- Must be terminated, or the account transferred to the Office of Communications upon the employee's separation from the Bank.

6.2.3 **No Delegations.** Spokesperson User accounts may not be delegated or assigned without the permission of the Office of Communications.

6.2.4 **Limitation on Approvals.** Approval for a Spokesperson User account on one social media platform does not grant an approval for accounts on any other social media platforms. Additional spokesperson accounts must be requested and approved on a case-by-case basis.

6.2.5 **Account Ownership.** Spokesperson accounts remain the property of EXIM Bank at all times and the Office of Communications reserves the right to revoke, cancel, delete, or reassign a Spokesperson account at any time.

6.2.6 **Guidelines for Spokesperson Users**

6.2.6.1 Spokesperson Users are responsible at all times for following the applicable laws, regulations, and EXIM Bank policies governing information security and records management.

6.2.6.2 Spokesperson User accounts are strictly for official use only, and may not be used for personal use.

6.2.6.3 Spokesperson Users are responsible for monitoring the accounts they "follow", "friend", "connect," or otherwise connect their Spokesperson User accounts to and using other features provided by social media providers. Spokesperson User accounts must not be associated with any accounts that behave in ways that are socially and professionally unacceptable.

6.2.6.4 In compliance with the Hatch Act, Spokesperson User accounts may not be connected (i.e., "friends" on Facebook, "following" on Twitter, or "connections" on LinkedIn) to accounts which appear to directly or indirectly support advocacy or political activity.

6.2.7 **Records Retention.** All content generated from a spokesperson account may be retained as records, in accordance with EXIM Bank records management policies. Accordingly, Spokesperson Users must consider the content they create in context of EXIM Bank's records management policy.

6.2.8 **Existing "Spokesperson" Accounts.** Spokesperson accounts created before the effective date of this policy will be reviewed by the Office of Communications to ensure alignment with the requirements described.

6.3 **Personal Social Media Use**

6.3.1 **General Online Behavior.** EXIM Bank employees who use

social media tools for personal use outside of the workplace do not require approval to do so. However, employees are expected to behave responsibly, within the law, and with professionalism at all times when participating in social media networks and platforms.

- 6.3.2 **Professional Courtesy.** Employees are expected to refrain from creating the appearance of speaking in the Bank's voice or disseminating inaccurate, negative, or disparaging information about the Bank. Employees should always be mindful that information posted on social media is easily disseminated and cannot be fully deleted once posted. Therefore, the exercise of discretion and professional behavior is encouraged when acting in one's personal capacity.
- 6.3.3 **Linking to EXIM Bank accounts.** Employees may use their personal social media accounts to retweet and repost from, or links to, official Bank social platform communications.
- 6.3.4 **Identifying as an EXIM Bank employee.** Employees who identify themselves as EXIM Bank employees on social media platforms, either in their account profile or in individual posts, must be considerate and understanding that, depending on the context, certain posts, associations, and activity may reflect poorly on the Bank and could be harmful for EXIM Bank business activities.
- 6.3.5 **Use of Disclaimers.** It is strongly recommended that employees who identify themselves as EXIM Bank employees in social media include a disclaimer in their account profile that they are not posting in any official capacity (ex: "*Comments do not reflect the views of EXIM Bank, nor of my opinions in my official capacity as an employee of the Bank.*")
- 6.3.6 **No Official Email Accounts.** Employees may not use EXIM.gov email accounts to establish social media accounts for their personal use.
- 6.3.7 **Hatch Act Compliance and Political Activity.** Employees and individuals working at the Bank who engage in social media activities are entitled to exercise their rights of free speech and participation in advocacy and political activity when they act strictly in their personal capacities. However, employees are reminded that they remain subject to the Hatch Act, including the following:
- Bank employees may not engage in political activity (e.g. post, "like," "share," "tweet," or "retweet" any items supporting a partisan group or candidate on Facebook or Twitter) while on duty or in the workplace, including telework hours;
 - Any Official User or Spokesperson User social media accounts should be limited to official business matters

and remain politically neutral;

- Employees may engage in political activities through their personal use of social media, however, they may not solicit or receive political contributions at any time (Note: employees are permitted to make their own political contributions while on their personal time); and,
- Employees can “like” or “share” partisan political candidates through social media, but they cannot “like” or “share” political fundraising solicitations through social media.

6.3.8 Use of Official Time and Equipment. While engaging in personal use of social media, employees may not use EXIM Bank-issued equipment, such as computers, laptops, iPads, iPhones, or tablets, in any manner that would violate applicable laws or EXIM Bank policies, including, but not limited to the Limited Personal Use policy, IT Rules of Behavior policy, and the Standards of Conduct. Employees are prohibited from engaging in political activity, lobbying, grassroots lobbying, promotion of personal or private businesses, or disparagement of individuals using EXIM Bank-issued equipment, while on official duty, or on EXIM Bank property. Employees are expected to conduct themselves professionally in and out of the workplace and to refrain from using EXIM Bank-issued equipment for activities that are illegal, inappropriate, or offensive. Activities that are illegal, inappropriate or offensive to fellow employees or the public include, but are not limited to:

- Hate speech;
- Materials that ridicule on the basis of race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, parental status, whether the individuals has engaged in a protected activity, (i.e. filing a complaint of discrimination); and
- Pornographic materials.

6.3.9 Prohibited Activities. In addition to the restrictions in section 6.3.7, above, employees are prohibited AT ALL TIMES from engaging in the following behaviors on social media:

- Posting anything obscene, threatening, harassing, or defamatory;
- Committing personal attacks of any kind;
- Disclosing Personally Identifiable Information (PII), proprietary information, or otherwise non-public information about the Bank;
- Using the EXIM Bank seal or logo without approval;
- Promoting hate or violence;

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- Reporting or publishing EXIM Bank information that is pre-decisional or internal;
- Posting personal content implying it is endorsed by the Bank;
- Sharing specific information regarding EXIM Bank transactions;
- Discussing matters subject to any type of litigation involving EXIM Bank;
- "Reporting" fraud, waste, and abuse outside the appropriate channels;
- Using offensive or inflammatory speech regarding race, color, religion, sex, national origin, age, disability, genetic information, sexual orientation, etc.;
- Engaging in lobbying activity using an official EXIM Bank title; and/or
- Using Bank-issued equipment for any activity prohibited by law or this policy.

6.3.10 **Special Issues Regarding LinkedIn.** LinkedIn is a social networking service whose purpose is linking professionals with other professionals. EXIM Bank employees may identify themselves on LinkedIn with their professional titles at EXIM Bank in accordance with the personal use restrictions outlined in this section. However, due to the business-oriented nature of LinkedIn, many individuals and businesses that seek or do business with EXIM Bank are connected to EXIM Bank employees on LinkedIn. As such, EXIM Bank employees' presence and activity on LinkedIn is subject to greater appearance concerns. Therefore, employees should be particularly mindful of both the personal use, as well as, official use guidelines in this policy when engaging in activity on LinkedIn. Employees should also take care to ensure that their interactions with EXIM Bank customers on LinkedIn do not extend to conducting official business outside of official channels.

Note: EXIM Bank employees whose presence on LinkedIn is associated with only non-Bank related entities (such as a personal account created for an approved outside employment activity) AND whose accounts do not identify the employee as an employee of EXIM Bank are entitled to post information on LinkedIn in a manner consistent with strictly personal use, as set forth in this policy.

