

Vocational Rehabilitation Agency Guidance on Social Media Use: A Policy Analysis

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Abstract

Given vocational rehabilitation's (VR) substantial role in workforce development, it follows that agencies would encourage and support consumers using the most current job-seeking methods, including social media. Recent data, however, show that online strategies are limited in VR practice and that many agencies lack comprehensive policies to guide social media use. We conducted a qualitative analysis to examine current VR social media policies and procedures and offer recommendations for policy development. Through an examination of open coding of 22 policies and one guideline, we identified seven themes and 25 subthemes, which mapped onto recommended social media policy elements from research. Only two VR policies, however, covered themes in a comprehensive way, and only one policy acknowledged social media as a tool for consumer job search. This outcome is an oversight given the emphasis social media plays in employment networking, proof of performance, and skills demonstration when seeking employment.

Keywords

employment, career/vocational, ethics, qualitative, methodology/statistics, rehabilitation research design, technology

Using Social Media in Employment Search

According to 2015 Pew Research Center data, the Internet is the primary resource for job seekers. Among people searching for employment in the past 2 years, 79% used online resources to look for jobs and 34% claimed online resources were the most important to them, exceeding connections through family and friends, professional connections, employment agencies, print ads, or job fairs/events (Smith, 2015). Aligned with these findings, current job seekers recognize the importance of the Internet and social media for researching employers, networking with family, friends and professionals, and promoting themselves through a positive online presence (Downey, 2012; Prodromou, 2015; Quast, 2013).

Employers use online resources to recruit potential employees, investigate job candidates, fact-check resumes, and research common connections (Grasz, 2014; Prodromou, 2015). Social networking sites like Facebook, LinkedIn, and Twitter offer opportunities to network and screen candidates and vertical job boards allow employers and job candidates to connect. A 2014 CareerBuilder survey of hiring managers reported that 43% used social networking sites to research job candidates, and among those, 51% found information that disqualified a candidate such as

inappropriate photographs, discriminatory comments, or poor communication skills (Grasz, 2014). Other managers (23%) reported hiring candidates based on things they found online such as background information that supported professional qualifications, creativity, or varied interests. Another study reported that 75% of recruiters are required to conduct online research of job candidates (Cross-Tab Marketing, 2010). Together, these data tell a persuasive story about the importance of online job search skills for securing employment, and include lessons for workforce development programs, including vocational rehabilitation (VR).

Social Media Use in Vocational Rehabilitation

Currently, there are 81 VR agencies in the United States, District of Columbia, and territories serving approximately 600,000 clients annually (Rehabilitation Services

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Administration, 2013). The VR system invests approximately US\$3 billion each year on individualized vocational and rehabilitative services to assist people with disabilities prepare for, secure, and maintain employment. Services include vocational counseling and guidance; job placement assistance; college, vocational, or skills education/training; referrals; and other employment supports such as job coaching, assistive technology, and supported employment. With the implementation of the Workforce Innovation and Opportunity Act (WIOA), VR responsibilities also include provision of transition services to better prepare students with disabilities for competitive integrated employment (U.S. Department of Education, 2014).

Given VR's substantial role in workforce development, it follows that agencies would encourage and support consumers using the most current job-seeking methods, including social media. Recent data, however, indicate that online strategies are limited in VR practice. A recent study about counselor use of social media in the VR setting ($n = 1,432$ counselors representing 32 agencies) found that 40% were blocked from using some or all social media sites while at work and only 43.3% used social media for any work activity (Goe & Ipsen, 2016). Despite low use rates, 37% of respondents said they had participated in training about social media use though work, and receiving training was significantly associated with higher reported rates of preparedness to help consumers (a) research job opportunities, (b) develop skills for professional networking, (c) improve consumer online reputations, and (d) address issues of disability disclosure on social media sites.

These findings are supported in another survey distributed to VR administrators ($n = 41$) that focused on agency policies and use. When asked whether staff could access social media sites at work, 34% responded yes, 37% responded "on a limited basis," and 29% responded no, staff did not have access (Ipsen, Goe, & West-Evans, 2013). Most respondents, however, indicated their agencies were moving toward more access in the future. Agency policies were mostly lacking at this time, where 61% of respondents said their agency did not have existing policies to guide social media use or were currently operating under state-level or parent policies that lacked applicability to counselor-consumer engagement.

Social Media Policies Within VR

Lack of supporting or clarifying policies and procedures makes it difficult for staff to confidently use social media within a counseling context, particularly where issues of confidentiality and ethics are concerned (Bontke & Lawler, 2012; Ipsen et al., 2013; Lehmann & Crimando, 2011). The diversity of uses, ever-evolving nature of social media platforms, and limited ethical guidance to keep pace with these changes can leave VR professionals unprepared to use

social media in VR practice (Garcia et al., 2016; Lehmann & Crimando, 2011). Adding to this confusion has been limited guidance for social media use by the Commission on Rehabilitation Counselor Certification (CRCC) Code of Ethics (Hartley, Tarvydas, & Johnston, 2015).

Sound social media policies will become even more important as VR allocates significant resources to transition aged youth through WIOA mandates, and general caseloads become increasingly networked (Chapin & Byrne, 2013). The typical social network user shares a variety of personally identifying information including name, age, interests, location, education, employment, and photos. They also rely on social networks for communicating with friends, accessing information, or planning events (Pham, 2014). To reach and engage this group, VR counselors need to embrace evolving communication strategies, and VR agencies must have effective policies in place to minimize ethical and confidentiality concerns (Garcia et al., 2016).

Background Literature

Researchers from the Center for Technology in Government conducted a policy analysis of 26 social media documents from various governmental agencies and interviewed 28 government professionals about social media practice that resulted in a set of eight essential policy elements including the following (Hrdinova, Helbig, & Peters, 2010):

- Employee access—guidelines about which employees may have access to social media sites and specific processes for gaining access.
- Account management—how the agency and employees create, maintain, and close social media accounts.
- Acceptable use—guidelines around personal, professional, and agency use and how these are monitored.
- Employee conduct—posting guidelines and consequences for inappropriate conduct.
- Content—editorial controls, monitoring, and disclaimers related to posted content.
- Security—best practices for ensuring data security and posting procedures related to personally identifying information.
- Legal issues—guidelines regarding records management and various disclaimers related to agency versus personal opinions.
- Citizen conduct—guidelines regarding two-way communication with consumers and how to handle this engagement.

Garcia and colleagues (2016) conducted a small study of VR policies ($n = 5$) and State Department policies ($n = 8$) related to professional use of social media in a rehabilitation setting. They identified 11 policy themes including account creation procedures, confidentiality, enforcement, definitions,

disclaimers, existing policies, oversight, appropriate use, purpose, reach, and accessibility for people with disabilities. Likewise, Pham (2014) suggested policy elements for school psychologists including purpose, definitions, informed consent, professionalism and privacy, legal liability and disciplinary action, technological competence, and tips for responding to social networking requests from clients.

This article builds on research by examining current VR social media policies and procedures. It concludes with suggestions for developing a comprehensive VR social media policy that includes safeguards against confidentiality and ethical concerns in terms of expanded social media use in practice.

Method

We secured Council of State Administrators of Vocational Rehabilitation (CSAVR) approval to conduct this research and contacted 76 VR administrators in the United States and Washington, D.C. We mailed cover letters describing two research projects, one on social media and another on contracted job development, and followed up with administrators to see whether they would be willing to participate in one or both projects. Administrators from 33 agencies agreed to participate in a counselor survey about social media use, and 23 of these (13 general, three blind, and seven combined) representing 20 states provided social media policies or guidelines for their agency. One agency provided documents focused on consumer computer use and were excluded from the analysis. Of the 22 remaining agencies, 14 provided agency-specific policies, eight provided state-level or overarching policies, and two provided guidelines about social media use. In one case, a state provided both an agency-specific and a state-level policy as they touched on different topics, and one state only provided guidelines.

Data Analysis

All policies were uploaded into NVivo qualitative software and analyzed by a team of two researchers. Analysis began with open coding to identify themes and dimensions in the data (Strauss & Corbin, 1998). Researchers first read and interpreted the policies independently. They assigned key words or phrases to short sections of the policy and categorized these into themes. Researchers compared themes and created coding categories and definitions based on identified themes. Researchers resolved coding disagreements through discussion and reanalysis of the content until consensus was reached. After initial coding, researchers reexamined the data and relationships among codes. Researchers discussed data that appeared miscoded and recoded data upon consensus. As in the first round, codes with similar meanings were merged. Through this process, researchers

identified seven themes and 25 subthemes highlighted in Table 1. Appendix A provides sample policy excerpts for each of the themes and subthemes described.

Policy Description

Twenty policies and one guideline provided a policy description. Of these, 19 included a *scope* of what was covered in the policy and who was affected, 15 provided a description of *oversight* by another agency or law, and 15 included a *justification* for why the policy was being implemented. Social media *justifications* include a communication strategy that reflects current practice ($n = 9$), a way to increase consumer engagement with the agency ($n = 7$), and a strategy for marketing the agency to the public and harder to reach constituents ($n = 7$). Social media was also described as a method to gather feedback from the public and consumers about the VR agency ($n = 4$), increase VR program transparency ($n = 3$), engage employers ($n = 2$), and broadcast emergency information ($n = 2$). One policy highlighted social media as means for helping build consumer capacity in job-seeking activities, including “providing job seekers with current job-seeking skills,” helping consumers “establish a professional online presence” and using “current employment practices in a digital era.”

Definitions

Fourteen policies and one guideline included operational definitions of *social media* and/or social networking and five of these included definitions of additional social media terminology or platforms such as blog, follower, tweet, Facebook, Twitter, and YouTube. Six policies included other definitions that were applied to social media guidelines such as “personally identifiable information” or “terms of service” with social media providers.

Administrative Controls

Administrative controls ($n = 19$ policies) described ways the agency retained control of social media content. This theme included five dimensions including account management, required administrative approvals, reviews and audits, policy adherence, and evaluation.

Account management ($n = 13$ policies) outlined administrative privileges for agency social media platforms. Of these, two policies described a centralized model, where a limited number of agency personnel (one to three staff) managed accounts and had approval to post information. The remaining 11 outlined a more disbursed model of social media administration that included other site administrators, such as regional supervisors or area office staff.

Required administrative approvals ($n = 13$ policies) described required approvals for establishing individual

Table 1. Social Media Policy Components.

Policy description (<i>n</i> = 20 policies, 1 guideline)	Why the agency supports the use of social media.
Justification (<i>n</i> = 15 policies)	Who is affected by the policy or guideline and what it covers.
Scope (<i>n</i> = 19 policies & 1 guideline)	Additional social media policies, guidelines, or laws that apply, including state and parent agency policies.
Oversight (<i>n</i> = 15 policies)	
Definitions (<i>n</i> = 14 policies, 1 guideline)	Definitions of social media, and various platforms or modalities, such as Facebook, blog, or podcasts.
Social media (<i>n</i> = 14 policies & 1 guideline)	Definitions of other terms in the policy, such as monitoring, public records, or personally identifiable information.
Other (<i>n</i> = 6 policies)	
Administrative controls (<i>n</i> = 19 policies)	Outlines who has privileges and access to agency platforms and who is responsible for making and reviewing posts.
Account management (<i>n</i> = 13 policies)	Describes required approvals before posting to an agency account or before establishing individual or program specific accounts.
Required approvals (<i>n</i> = 13 policies)	Right of agency to review employee posts on social media for alignment with policies.
Reviews and audits (<i>n</i> = 11 policies)	Expectations about employee understanding of social media policies and disciplinary actions to policy violations.
Policy adherence (<i>n</i> = 11 policies)	Processes for evaluating the effectiveness of posts, such as feedback from stakeholder, focus groups, or analytics software.
Evaluation (<i>n</i> = 4 policies)	
Prohibited use (<i>n</i> = 18 policies)	Violations about posting personally identifying information (PII) or violating HIPAA or FERPA on social media or other electronic formats.
Confidentiality violations (<i>n</i> = 14 policies)	Describes prohibited uses of technology by employees, such as hacking, knowingly spreading viruses, engaging in criminal activity, posting discriminatory or harassing comments, etc.
Personal use violations (<i>n</i> = 17 policies)	
Security (<i>n</i> = 13 policies)	Guidelines for accessing technical assistance when security comes into question and reviewing third-party providers.
Technical support & oversight (<i>n</i> = 8 policies)	Procedures for setting and changing passwords.
Passwords (<i>n</i> = 7 policies)	Guidelines for minimizing threats to security, including settings configurations, and log out procedures.
Practices to minimize security threats (<i>n</i> = 6 policies)	
Public engagement (<i>n</i> = 17 policies)	Respectful; within purview of expertise; balance between transparency and privacy protections.
Ethical guidelines (<i>n</i> = 11 policies)	Guidelines about communications with work-related people (clients and coworkers) on personal accounts.
Professional use guidelines (<i>n</i> = 6 policies)	Suggested language for separating professional and personal opinions.
Disclaimers (<i>n</i> = 3 policies)	Acknowledgment that posts on personal accounts may be perceived by public as representing the agency.
Public perceptions (<i>n</i> = 3 policies)	Requirements or forms for gaining consumer permissions to post social media content.
Consumer releases/agreements (<i>n</i> = 4 policies)	Guidelines about what constitutes public record.
Public records (<i>n</i> = 13 policies)	
Posting guidelines (<i>n</i> = 17 policies, 1 guideline)	Accessibility requirements for social media.
Accessibility (<i>n</i> = 7 policies)	Posts that are accurate, concise, respectful, and proofread.
General guidelines (<i>n</i> = 11 policies)	Suggestions for posting content and response time to public comments.
Type and frequency (<i>n</i> = 9 policies, 1 guideline)	Guidelines about responding to public comments and criticisms of the agency.
Responding to public (<i>n</i> = 10 policies)	

Note. HIPAA = Health Insurance Portability and Accountability Act of 1996; FERPA = Family Educational Rights and Privacy Act.

Table 2. Personal Use Violations.

Type	Description	Policies
Unprofessional comments	Including comments that are harassing, obscene, defamatory, or discriminatory	<i>n</i> = 13
Conducting personal business	Including soliciting donations, advertising, or promoting political agendas, candidates, or groups	<i>n</i> = 12
Violating copyright procedures	Including forwarding copyrighted information and violating software licenses by downloading copies on multiple machines	<i>n</i> = 11
Violating laws	Including unspecified local, state, or federal laws	<i>n</i> = 9
Interfering with security	Deliberately spreading viruses, damaging files or computers, copying files without authorization, logging into another's computer	<i>n</i> = 5
Personal activities	Including gaming, online dating, chatting or posting in personal online communities, making personal purchases, etc.	<i>n</i> = 5
Spamming	Including forwarding chain letters, jokes, pictures, obscene materials, etc.	<i>n</i> = 5
Nontransparency	Using aliases or fake accounts, posting anonymously, or disguising one's identity	<i>n</i> = 2
Negative comments	Posting negative comments about the agency, staff, or programs	<i>n</i> = 1

employee accounts. Seven of these outlined a specific process for gaining approvals, such as a submitting a plan or application and/or training or branding requirements for getting started. In particular, agencies required employee justifications for establishing their own social media accounts. The following types of information were requested:

- Type of platform and target audience
- How it will meet business objectives of the agency
- Type of information or content to be posted
- How the employee will use the platform and anticipated time commitment
- How the site will be maintained over time

Reviews and audits (*n* = 11 policies) described review of employee posts for compliance with agency or state-level policies. Of these, 10 referred to audits for content violations such as offensive material or confidentiality violations, two referred to compliance with brand identity, and one referred to compliance with agency passwords and guidelines for privacy settings. *Policy adherence and understanding* (*n* = 11 policies) described disciplinary action for policy violations, and five of these explicitly describe employee responsibility for reviewing policies and attaining understanding. *Evaluation* (*n* = 4 policies) described review of social media outreach strategies, including input from social media stakeholders (*n* = 3) and use of web-based analytics to assess impact (*n* = 1).

Prohibited Use

Confidentiality violations. Of the 18 policies describing prohibited uses of social media, 14 focused on posts and

public comments that violated confidentiality, such as including personally identifying information (i.e., social security number, full name, address, phone number) or case-specific information that violated FERPA (Family Educational Rights and Privacy Act) or HIPAA (Health Insurance Portability and Accountability Act of 1996) protections. In addition, one policy said not to comment on anything related to legal matters or litigation and another warned of confidentiality breeches from unauthorized public comments.

Personal use violations. Personal use violations (*n* = 17 policies) included a range of personal use violations described in Table 2.

Security

Security issues (*n* = 13 policies) were addressed in terms of technical support and oversight, password procedures, and practices to minimize security threats. *Technical support and oversight* (*n* = 8 policies) included passages that described responsibility within the agency for responding to identified security threats and for reviewing social media sites and third-party plug-ins that might introduce security risks. This subtheme also included statements about review of social media service provider agreements by legal counsel to check for discrepancies between state law, agency policies, and provider agreements.

Passwords (*n* = 7 policies) included specific procedures for developing strong passwords and updating them to minimize hacking. *Practices to minimize security threats* (*n* = 6 policies) included limits on peer-to-peer file transfers, not clicking on shortened URLs, not following links to

third-party content, and logging out of accounts and closing browsers when finished viewing.

Public Engagement

The theme of public engagement ($n = 17$ policies) provides guidance for engaging the public in ethical, transparent, and professional ways. Passages are separated into six subthemes including ethical guidelines, professional use guidelines, public perceptions, disclaimers, consumer releases, and public records. *Ethical guidelines* ($n = 11$ policies) focus on posts that are credible, accurate, transparent, and within a person's level of expertise or authority. These guidelines include using full professional contact information when setting up work-related accounts and communicating via social media. *Professional use guidelines* ($n = 6$ policies) relate to clear separation of personal and professional communications. In these passages, employees are discouraged from communicating with, commenting on, or following work-related people or agency pages from personal social media accounts, including present and former consumers and coworkers. *Disclaimers* ($n = 3$ policies) include language for making posts from professional accounts that are distinct from the agency such as "The opinions expressed here are the personal opinions of the author and do not necessarily represent the views and options of THE AGENCY." *Public perceptions* ($n = 3$ policies), on the contrary, refer to situations where personal comments are still perceived by the public as representing the agency. *Consumer releases* ($n = 4$ policies) describe requirements for obtaining consumer permission before sharing any comments, posts, pictures, audio recordings, or videos of consumers on social media.

Public records ($n = 13$ policies) describe the public nature of social media and the confidentiality risks associated with social media posts. All of these policies included specific language that highlight public record laws and eight further describe how social media records will be downloaded and maintained by the agency. Six policies also describe confidentiality risks associated with social media generally, and the fact that reposts and third-party provider agreements may limit the opportunity to remove content posted on social media sites.

Posting Guidelines

Posting guidelines ($n = 18$ policies, 1 guideline) highlight strategies for engaging the public with social media. Subthemes include accessibility, general guidelines, types and frequency, and responding to public comments. *Accessibility* ($n = 7$ policies) includes references to alternate or accessible formats for all types of social media posts including videos, pictures, audio files, and written

materials. *General guidelines* ($n = 11$ policies) stress professional standards for making posts, such as accurate, truthful, and/or factual; concise, clear and accessible, without jargon or abbreviations; proofread and with correct grammar, spelling and punctuation; and respectful and mindful of impact.

Types and frequency ($n = 9$ policies and 1 guideline) include suggestions for types, frequency, and tenor of posts. Types of posts ($n = 5$ policies and 1 guideline) include specific suggestions for topics, such as sharing local and disability-related events (i.e., job fairs, transition fairs, and business expos), notices about changes to services (i.e., office moves, new hours), information about related services (i.e., child care, transportation, support services), upcoming public meetings (i.e., state rehabilitation council meetings), links to other sources (i.e., newspaper articles, career blogs, other agency posts), sharing survey results, and highlighting good business partners or consumer success stories. Frequency ($n = 5$ policies) suggests rates for posting, monitoring, and responding to social media comments, and tenor ($n = 3$ policies) highlights audience engagement through posts that are passionate, provoking, or purposeful.

By design, social media allows users to create, share, and respond to content. Open communication platforms, however, open the agency and VR staff to negative comments from the public. *Responding to public comments* ($n = 10$ policies) includes a variety of strategies for responding to negative public content on social media accounts. These include acknowledging the negative comment and passing it along to an appropriate person ($n = 4$ policies); responding in a polite and professional manner ($n = 4$ policies); ignoring the comment to minimize the potential for an escalated argument ($n = 3$ policies); removing the comment, particularly if it violates acceptable use guidelines; modifying settings so that comments are screened by a moderator before posting ($n = 3$ policies); and moving the discussion to a more secure communication channel ($n = 2$ policies). In addition, four policies recommend posting acceptable use statements on all agency-related social media accounts, such as specifying the types of posts that will be removed. One policy included a no-engagement statement that specifies the agency will not engage in two-way conversation over social media channels.

Policy Completeness

There was variation in the comprehensiveness of agency policies. Of the 22 policies and one guideline reviewed, seven policies addressed all seven identified themes. Of these, two addressed 80% or more of the subthemes. The remaining policies addressed 6 themes (7 policies), 4-5 themes (5 policies), 1-3 themes (3 policies), and between 4% and 65% of the subthemes.

Discussion

Through open coding of 22 policies and one guideline, we identified seven themes and 25 subthemes, which mapped onto recommended social media policy elements from the research (Garcia et al., 2016; Hrdinova et al., 2010; Pham, 2014). Only two policies, however, covered themes in a comprehensive way, and only one policy acknowledged social media as a tool for consumer job search. This is an oversight given the emphasis social media plays in employment networking, proof of performance, and skills demonstration when seeking employment.

In the absence of clear guidelines, counselors may feel unprepared to incorporate social media into counseling practice. Data from a study about social media use among counseling staff ($n = 1,447$) indicated that only 28% of counselors feel prepared to assist consumers with improving their online reputations and only 31% feel prepared to assist them with online professional development activities (Goe & Ipsen, 2016). In part, this may relate to concerns over ethics in counseling practice or lack of clear procedures or guidelines for working with consumers in online job search activities (Barros-Bailey & Saunders, 2010; Chapin & Byrne, 2013; Lehmann & Crimando, 2011).

Garcia and colleagues (2016) highlighted the absence of ethical guidelines for direct communication with consumers within current VR social media policies. Similar issues might apply for counselor assistance with consumer social media competencies. For instance, assisting a client with improving online reputation may open counselors to finding information that falls under “duty to warn” laws.

The most recent CRCC (2017) Code of professional ethics included some basic guidelines for social media use, but many of these are not consistently included in agency-level policies. These guidelines include guidance about (a) a clear separation of counselor professional and personal pages and profiles; (b) acknowledging that information posted on social media sites can be easily shared and become permanent in the public domain; (c) informing consumers about the benefits, limitations, and boundaries of social media use within VR practice; (d) limiting counselor Internet searches on consumers unless it is relevant to the counseling process and the consumer has been informed; and (e) making sure that counselor posts do not include any personally identifiable information, without prior written consent by the consumer.

The American Counseling Association (ACA; 2014) also has some applicable guidelines that might be incorporated into VR policies. Among these include (a) developing a plan for how to respond to “friend” requests from consumers with and without boundary issues; (b) developing an informed consent form for consumers that clearly outlines social media advantages, limitations, and risks to confidentiality; (c) exploring privacy settings for both

counselor and consumers so sensitive information is not unknowingly shared; (d) and guidelines on how to avoid accidental disclosure of confidential information. In addition, counselors could benefit from training on ethical situations that balance values of consumer autonomy and justice, with counselor nonmaleficence and beneficence (ACA, 2014; Garcia et al., 2016; Hartley et al., 2015). Together, CRCC and ACA guidelines provide a framework for developing a bare bones VR policy.

In response to these recommendations, VR agencies should do a better job in clearly describing how social media will be used at the agency and counselor levels along with the agency’s commensurate efforts to address ethical and confidentiality concerns for varied uses. A surprising gap in agency policies was omission of how social media would be used to assist consumers seek or secure employment. In fact, only one policy alluded to this capacity. This is in contrast to data that indicate approximately 26% of counselors utilize Facebook in counseling practice, including to search for jobs (18%), find out information about consumers (16%), explore a consumer’s online reputation (10%), or find consumer’s they have lost contact with (16%, Goe & Ipsen, 2016). At a minimum, policies should describe how consumers will be fully informed about the benefits, limitations, and boundaries of social media use within VR practice.

Policies should also guide counselors in ethical decision making where social media is concerned. Clear delineation of appropriate and inappropriate social media uses will help counselors confidently adopt existing practices. Processes for addressing emerging strategies should also be covered, because networking strategies and sites continually evolve. Along these lines, agencies must continually revisit and revise social media policies to accommodate changing online strategies and emerging legal issues and interpretations that occur with them. Synthesizing these recommendations with existing policies, we recommend the following essential policy elements:

- Policy scope—comprehensive guidelines about social media use at both the agency and counselor levels, including a full description of acceptable practices.
- Consumer awareness—procedures for informing consumers of the risks and benefits of social media engagement, including inherent risks to confidentiality and social media as public record.
- Acceptable use guidelines—clear delineation of agency expectations, monitoring procedures, and associated disciplinary actions.
- Account management—how the agency and employees create, maintain, and close social media accounts.
- Confidentiality—procedures for how the agency and counselor will minimize risks to confidentiality breaches (such as privacy settings, log out

procedures, password protocols, and posting guidelines) and steps for addressing any unforeseen confidentiality or security breach.

- Ethical guidelines—posting guidelines that highlight professionalism, confidentiality, and counselor non-maleficence and beneficence.

Conclusion

In this era of growing connectivity, social media plays an increased role in counselor-consumer communication, job search, and advocacy (Hartley et al., 2015). In this

environment, VR policies, guidelines, and training will become increasingly important for supporting effective counseling practice. This article explored existing themes and subthemes from VR social media policies and provides some suggested benchmarks for crafting a comprehensive social media policy for consumer interaction and engagement. Next steps involve input from VR administrators and counselors to vet existing policy themes, identify gaps, and provide input on ethics in practice. Through this process, we hope to develop a model social media policy that could be used as a working template for VR agencies and adapted as needed to specific agency goals.

Appendix

Sample Excerpts.

Policy description	
Justification	<p>“Social Media technology is a powerful tool that can enhance education, communication, engagement and career activities. The Bureau of Rehabilitation Services (BRS) has created a professional social media presence in order to best advocate for our job seekers, utilize the most current methods of communication and provide job seekers with the tools to engage with employers in this digital era.”</p> <p>“The DORS social media channels are tools that provide a means for consumers, businesses, community rehabilitation programs, other stakeholders, and the public to interact with DORS.”</p>
Scope	<p>“This Social Media policy is established to articulate expectations and guidelines to protect the confidential integrity of agency, employee, and client information of the Arkansas Department of Career Education. This policy does not preclude employee use of social media. It defines accountability and responsibilities regarding an employee’s unauthorized use of agency, client, and employee information in social media networks or in any public communication.”</p>
Oversight	<p>“The use of social media is subject to applicable statutes, code and laws as well as all policies pertaining to the code of conduct and ethics published in the DWD Policy Manual.”</p>
Definitions	
Social media	<p>“Social Media—Primarily Internet and mobile-based tools for sharing and discussing information. The term most often refers to activities that integrate technology, telecommunications, and social interaction, alongside the construction of words, pictures, video, and audio.”</p>
Other	<p>“Monitoring—reviewing, editing, and reporting to management, as appropriate, comments posted on social media sites to ensure adherence to HHS and DARS social media policies.”</p> <p>“Public Records—A record is defined broadly to include electronic records, including e-mail and metadata. Any record that is prepared, owned, used or maintained by the DSB potentially relates to the conduct of government and is potentially disclosable.”</p>
Administrative controls	
Account management	<p>“The Public Information Office as authorized by the ODRS Director is responsible for overseeing the ODRS’ brand identity and key messages communicated on the sites. The Public Information Office will maintain a log of all social networking services used by agency employees in the course of official business. The Public Information Office is responsible for oversight and management of all agency accounts with social networking providers. Authorization for the engagement with agency social network accounts is a function of the Public Information Office.”</p>
Required approvals	<p>“For interactive accounts: Employees wishing to establish social media interactive accounts for official KCC business communication or who wish to set up an RSS feed must seek advance approval by following the KCC Social Networking Account Procedure/Request Form (available on the KCC Intranet). All such applications must meet strict standards and will be assessed accordingly. Any requests that are denied may be appealed to the KCC Social Media Policy Committee. At any point during the application process, the committee may inquire for more information regarding application. The applicant listed on the form will have three business days to reply to the request.”</p>

(continued)

Appendix. (continued)

Reviews and audits	<p>“IVRS Social Media Account Audits. Social Media accounts and passwords shall be audited a minimum of twice a year. Audits shall confirm accounts and passwords with supervisors and staff assigned to use those accounts.”</p> <p>“MIS and OCCR will be responsible for the continued monitoring of all communications and marketing developed through social media or online tools. These offices have the right to remove or restrict any content that is deemed in violation of this social media policy or the MDRS brand identity standards.”</p>
Policy adherence	<p>“Understanding the provisions of the Social Media Policy is the responsibility of the employee. Understanding means that each employee shall direct specific questions to his/her supervisor regarding any policy provision that he/she does not understand, or for which clarification is needed. A lack of understanding does not preclude responsibility for compliance with these policy provisions nor accountability for substantiated infractions or violations.”</p>
Evaluation	<p>“The Public Affairs Officer and Staff Specialist for Electronic Accessibility & Internal Communication will meet, as needed, with DORS Executive Staff, the social media contacts, and the Division-designated Social Media Council to review and evaluate DORS social media strategies and procedures.”</p>
Prohibited use	
Confidentiality violations	<p>“It is unlawful to disclose or use ODRS” or respective client’s confidential or proprietary information in any form of online media.</p>
Personal use violations	<p>“The following content is not allowed: 1. Profane comments or language; 2. Sexual content or links to sexual content; 3. Solicitations for other businesses or commerce; 4. Comments in support of or opposition to political campaigns or voting measures; 5. Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, status with regard to public assistance, national origin, physical or mental disability or sexual orientation; 6. Content that encourages illegal activity; 7. Content that violates the Health Insurance Portability and Accountability Act of 1996 (HIPAA) Privacy and Security Rules; 8. Information that may compromise the safety or security of MDRS personnel or infrastructure or the general public; and 9. Content that violates a legal ownership interest of any other party or public.”</p>
Security	
Technical support & oversight	<p>“DTI will provide technical leadership in security, network performance issues and application usage. The GIC will lead in content and statewide coordination implementation. DTI will manage the overall network usage of social media sites, particularly as it relates to bandwidth and malware/exploit issues. Accordingly, as required, DTI may filter some or all sites categorized as Social Media to mitigate complications of use.”</p> <p>“CPER has the authority to accept the terms of use of third-party social media sites on behalf of DARS after the terms have been reviewed by legal services, the Information Resources manager (IRM), and executive management.”</p>
Passwords	<p>“a. IVRS ITS staff shall be responsible for changing universal or all-purpose account passwords on the social media site and the IVRS network, documenting password changes and communicating new passwords to applicable staff. b. As a best practice it is recommended that when practical and feasible, IVRS ITS use a password generation tool in order to create strong passwords. c. Social Media account passwords shall be changed when staff who have access to those accounts leave employment.”</p>
Practices to minimize security threats	<p>“Social networking can make a user’s computer vulnerable to denial of service (DoS) attacks. Social networking users will configure their social networking clients in such a way that they do not receive messages from unauthorized users.”</p> <p>“Users of social media must be aware of scams and viruses. Social media tools generally contain third-party content not under the control of the agency. Malicious code may be hidden in links, games, surveys, advertisements, e-mail, and instant messaging programs. It is recommended that you do not click on or follow links to third- party content displayed on social networking pages.”</p>
Public engagement	
Ethical guidelines	<p>“Ethical Conduct: State Employees and State Organizations will act and conduct themselves according to the highest possible ethical standards. A summary of the key points of ethical Social Media conduct are reproduced below: i. Customer protection and respect are paramount. ii. We will use every effort to keep our interactions factual and accurate. iii. We will strive for transparency and openness in our interactions and will never seek to “spin” information for our benefit. iv. We will provide links to credible sources of information to support our interactions, when possible.”</p>

(continued)

Appendix. (continued)

Professional use	"A. Do not use your personal social media accounts to 'like,' 'follow' or comment on the BRS social media pages, only use professional accounts. B. Do not use your personal social media accounts to 'friend' or 'follow' job seekers, use only professional accounts."
Disclaimers	"Each employee will include a disclaimer for all direct or indirect comments that are posted that references this agency. The following is a disclaimer statement example: 'The opinions expressed here are the personal opinions of the author and do not necessarily represent the views and opinions of the Arkansas Department of Career Education.'"
Public perceptions	"While utilizing social media tools, differentiating among public, private, personal and professional opinions can be difficult at times. When an individual is identified as an employee of the state, the person creates perceptions about expertise towards the state regarding legislative stakeholders, customers, business partners, the general public, colleagues, and managers."
Consumer releases/ agreements	"Before sharing a comment, post, picture or video through any type of social media, obtain appropriate permission. For job seeker, their permission must be in the form of a written release of information."
Public records	"All MDRS social media sites are subject to State of Mississippi public records laws. Any content maintained in a social media format is a public record. All approved designated personnel should maintain content in an accessible format so that it can be produced in response to a public records request."
Posting guidelines	
Accessibility	"Public information materials (both printed and electronic) are accessible to individuals with cognitive, motor, or sensory disabilities. DORS Staff Specialist for Electronic Accessibility & Internal Communication is responsible for providing these materials using the best technologies possible in view of staff and financial resources."
General guidelines	"Information presented on social media sites must follow professional standards for good grammar, spelling, brevity, clarity, and accuracy and must avoid jargon, obscure terminology, or acronyms."
Type and frequency	"Postings on the DORS Facebook page may include: A. Consumer success stories. B. Notices about changes that impact DORS services (i.e., emergency/inclement weather closings of DORS offices, office moves, road closures, etc.) C. The DORS YouTube channel link. D. Events (i.e., job fairs, transition fairs, business expos, etc.) E. Resource news/information/news for: Consumers (i.e., info/news about related services: child care, transportation, supports services, etc.); Businesses/Employment Partners; CRPs. F. Notices of Maryland State Rehabilitation Council (MSRC) meetings. G. Notices of DORS/MSRC Public Meetings."
	"Responses to all inquiries or comments must be posted within a 24 hour time period. When replying speak to followers or fans as you would any other consumer in a professional situation. Encourage comments and engaging conversation."
Responding to public	"Unfavorable comments will be acknowledged (when appropriate) and concerns will be passed to the appropriate DORS staff member, or referred to the CAP office. Responding to negative comments creates an opportunity to address consumer/public frustrations, influence perception about DORS, and share useful and educational information."

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