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What is new media?

New media is an umbrella term meant to encompass all new digital technologies. Blogs, website content, social networking, online video and podcasts, are all forms of new media.

While technology is evolving quickly and new sites pop up every day, a few platforms appear to be sticking around. The New Media team at PPFa has developed the following document to share our strategy, legal, and security best practices for Facebook, MySpace, Twitter, YouTube, and blogging.

Before getting into specifics, there are a few guiding principles the national office follows when using new media. In general new media is:

- Connected and non-hierarchical. Unlike traditional broadcast media where the flow of information is very linear from producer to consumer, new media allows information to flow between individuals across existing networks.
- Interesting and niche. New technologies allow anyone to have a voice online, without an editor, a staff, or even any money. This proliferation of voices has led to an incredibly diverse (and sometimes chaotic) media environment where only the best content gets attention. New media content does not need to have a mass appeal, and content that is interesting to particular groups or niche audiences can perform particularly well.
- Quick and up-to-the-minute. Readers go to blogs because they want to find out what's happening now, without waiting for tomorrow's paper. Because new media is expected to be quick, there is a higher tolerance for small errors and frequent revisions. Online news cycles are often faster than traditional ones, sometimes news is moving so quickly we determine it's best to let something die rather than respond.
- Authentic and personal. Visitors look to new media to connect personally to writers, like-minded individuals, and friends. They expect a personal voice, honesty and transparency, and have no tolerance for 'spin.'
- Searchable and enduring. In the age of Google, it's easier than ever to find and monitor conversations that you're interested in. Every day search engines refine our searches for photos, maps, and connections between people. It almost feels like Google, Yahoo and MSN are anticipating our search. The archival nature of the Internet also means nothing is "hidden" for long and content quickly moves beyond its original, intended audience.

We are always happy to discuss general trends and best practices in new media. We also recommend the following books and blogs (and would love your suggestions!):

- [Here Comes Everybody](#) by Clay Shirky
- [The Search](#) by John Battelle
- [Mashable.com](#)
- [Techcrunch.com](#)

Local and National Presences on New Media

The difference between local and national Planned Parenthood presences on new media is one of depth versus breadth. As we know from research and experience, the majority of the population only knows of one "Planned Parenthood"—very few people understand the nuance of a national office, a state office, or an affiliate or local 501(c)(4) organization.. Those that do, however, are your most committed supporters and, unfortunately, may be your most committed foes.

In new media, our breadth rather than depth often means that our national presences have a large group of less connected supporters. PPFa and the Action Fund have lots of friends, fans and followers who recognize the name Planned Parenthood and want to be part of a national movement, but these people are not necessarily connected in person to our offline work.

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At a local level, we often see smaller groups of very committed supporters—your online friends attend fundraisers, rallies and teen nights and more importantly, they understand that you are their health care advocate and a reliable source. When you host an event and invite Facebook fans, they show up, become volunteers, or make a donation.

What does depth mean for your work?

- It's natural for state and local new media pages to have fewer followers and less user generated content, though these members are usually more active than the average supporter. Also, because you're reaching out into the local community, your number of friends, fans and followers will plateau—that's ok!
- People who are friends/fans of local Planned Parenthood organizations on new media platforms are typically "super-advocates" – local activists that are passionate about reproductive rights and are looking to directly support Planned Parenthood in their community.
- New media is a great way to encourage your online fans to meet you offline at events, to take action on local issues, and support your special programs. Local Planned Parenthood organizations are uniquely positioned to activate local supporters, garner the support of young activists and engage a local community.
- Consider focusing your work on:
 - Creating an online community for advocates, and translating that community interaction into on-the-ground action—ask questions, encourage discussion, and listen.
 - Connecting with local groups.
 - Highlighting special programs or services.

Additional ways to connect with supporters:

- Interact with supporters when possible through comments, messages, and re-tweets. Ask questions, encourage supporters to talk to each other, and listen to their answers.
- Send messages consistently yet sparingly. Up to twice a week is good for bulletins on MySpace and updates on Facebook. No more than once a day for blogs (MySpace) or notes (Facebook). Twitter and other various small posting outlets on Facebook (status updates, links) can be used a few times a day.
- Friend, Follow and Fan other Planned Parenthood organizations to keep up with what others are doing online (and borrow their best ideas!). Follow guidelines on linking between 501(c)(3) and 501(c)(4) sites, set out in the [Quick Guide: 501\(c\)\(3\)/501\(c\)\(4\) New Media](#).
- Don't feel the need to involve social media in every campaign. What you're posting should be relevant to and appropriate for your social networking audience.

New Media Messaging

While our goal is to keep our messages consistent across media, new media demands a more casual tone and style. As you expand your work in new media, you may need to train new spokespeople to represent you in new technologies, because while the style may change, the same principles apply to all of your communications. We strongly recommend training all of your staff or volunteers who are working on new media by utilizing the PPFA style guide and basic talking points. Starting with the same strategy and message will allow more ownership and flexibility in execution. Finally, we all make mistakes—probably more as we expand the number of venues where we aim to respond quickly and personally—so set up some review processes and plan how you will correct and learn from the inevitable fumbles.

General best practices for new media language and tone

- Language on blogs and social networking should be very casual and fresh (read other popular blogs frequently to get an idea of what a good “bloggy” voice is). Short ‘n’ sassy beats the pants off of long n’ boring.
- Social media is a great opportunity to allow our supporters to feel like they’re getting a personal, behind-the-scenes peek at Planned Parenthood. Tone should be conversational and warm, as if you’re speaking with friends.
- Having real-person representatives as the authors of your blogs and social media messages puts a human face on our organization. For example, the national office’s Social Media Specialist signs Facebook messages “XOXO, Kendall at Planned Parenthood.”
- Create unique content for social networks so there’s an incentive for people to join and friends/fans feel like they’re getting a special inside scoop.
 - Do not use social networks to simply repost web content. Nobody is interested in seeing your exact website in Facebook form.
 - Don’t send an exact copy of an email message to your social networks. Repurposing an email is fine, but only if the copy is edited to reflect a more social media-appropriate tone (though it’s best to simply write entirely unique content). Using emails word-for-word is a huge no-no – many of your social networking friends/fans will likely be on your email lists as well, and they’ll resent getting double messages
 - Press releases are not blog posts. It’s ok to incorporate talking points, but do so sparingly and make the wording as casual as possible. Sterile, “professional” language is a social media turn-off.
- Your organization has final responsibility for content posted on its social media pages. Ask yourself if you would want a volunteer in charge of your website or other publication. Your Facebook page is no different. If you do use volunteers, they must be trained and you must work closely with them to monitor their work. Clarify goals/ground rules up front, give them message & best practices training, and check their work frequently to ensure that content is appropriate.
- Remember, content you post online is publicly available. Don’t post anything that you wouldn’t want to see in an email to your CEO or Board Chair, attributed to you.
- Have fun! No seriously, HAVE FUN!

Promotion

While new media is an increasingly important and popular method of spreading your message, it’s important to be strategic about how you utilize both your content and supporters on social networking. “Build it and they will come” doesn’t necessarily apply here. Success depends on the connections you make and the ways in which you use them - simply having a presence and waiting for people to discover you isn’t enough.

- Promote your social networks on your other web properties, GetActive campaigns, e-mail signatures and printed materials. Be sure to follow advice on linking between 501(c)(3) and 501(c)(4) sites contained in the [Quick Guide on New Media](#). Plan campaigns that have the express goal of growing your new media friends, fans and followers—from contests to events, share with your contacts online. Note: contests often have legal rules. Check with local counsel.

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Setting Goals and Evaluating Effectiveness

There are a number of metrics to determine the success of your new media work, and they will be different for each Planned Parenthood organization, based on its goals. If you are trying to build your lists, number of friends/fans/followers might be the right metric. If you are looking to build connection to your members, the number of comments or posts might be a good metric. If you are looking to recruit more volunteers/offline activists, conversion from online friend to offline contact may be important.

Legal Best Practices

- Establish a written procedure and policy for reviewing all sites for appropriateness of content, including postings by outside individuals and organizations. See comment guidelines. Review should be frequent and regular and all inappropriate materials should be deleted, where that is possible.
- Follow the advice in the [Quick Guide: 501\(c\)\(3\)/501\(c\)\(4\) New Media](#) on compliance with the tax and election laws..
- While we encourage all affiliates to build innovative and creative web properties, please follow national office guidelines on appropriate use and display of the Planned Parenthood trademark and logos.
- Don't use other people's copyrighted items—photos, videos, audio or text—without their permission. Links or very short excerpts with a link are fine.
- If you're posting photos/videos you've taken yourself, double-check that you have appropriate [permission and release](#) from the subjects.
- Follow legal guidelines on obtaining patient stories or other information in the clinic setting. .. Never post patient stories or photos on-line without following these [guidelines](#).
- If individuals post their personal stories on your pages, obtain permission before using those stories in another context. For example, don't use a personal story in a fundraising letter without obtaining [permission](#).
- Sites made up of "unofficial" blogs by Planned Parenthood staff members must follow all the legal guidelines for official sites.
- Maintain a written policy for staff members blogging on their own time. See [sample policy](#) on Extranet.

Security Best Practices

Remember: content on new media sites is publicly available, sharable, and findable. Do not post content that might compromise the privacy or safety of individuals associated with you. Don't post pictures of health center interiors and don't identify your doctors or clinicians by photo or by name, without express written permission. Don't publicize private events or locations of individuals

- Do not interact with anti-choice activity, but remove or block users as appropriate (see sample comment guidelines).

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- When it comes to moderating comments, you know your area best—something that reads as “healthy debate” in one area could read as “threatening” in another area. Use your best judgment.
- Consult your local security staff to discuss specific areas of concern.
- Consider who is a spokesperson and who is a public face. As an administrator of a Planned Parenthood social media presence, you may find yourself more visible than before. Consider which details of your life are personal, that you will not share, in advance. Discuss any concerns with your affiliate security point person.
- If a particular individual threatens or harasses you online, review the User Agreement for the site, and report any behavior you think is in violation immediately. Do not get into an argument in public space. If you feel the conflict has escalated so that it poses a genuine threat to you personally, or to Planned Parenthood, talk with your affiliate security person and discuss filing a complaint with law enforcement. Remove offending materials, where possible. See comment guidelines.

Additional Suggestions

Designing your pages

- Make sure your profile/page name is correct and easily searchable.
- Graphics are better than text, but only if they're clean, simple, visually pleasing, and convey the necessary information.
- Make health information findable. Although we often use new media for advocacy, always remember to have information for seekers of health information and services. Clearly state necessary affiliate/medical center info (locations, phone numbers, services) in an easy-to-find location, but don't have it be the focus of your profile/Page.
- Each Planned Parenthood organization should have only one centralized location per social network. Only one profile on MySpace, one Page on Facebook, one Twitter account. Creating specialized niche profiles/Pages confuses supporters and disorganizes your community.
- State and local organizations are welcome and encouraged to use national materials and resources. You may repost our blogs, tweets, and images. However, observe legal guidelines in [Quick Guide: 501\(c\)\(3\)/501\(c\)\(4\) New Media](#) on posting Action Fund electoral content on your 501(c)(3) site or page.



Facebook.com, <http://www.Facebook.com>, connects people with friends and others who work, study and live around them. People use Facebook to keep up with friends, upload an unlimited number of photos, share links and videos, and learn more about the people they meet. Originally a site for college students only, in 2006, Facebook opened its doors first to high school students, and then to anyone with an email account. As of January 2009, Facebook has 200 million active users, with more than 100 million users who log on to Facebook at least once each day.

Nationally, we've found that our users are primarily interested in advocacy and activism, and our Facebook presence is run by Planned Parenthood Action Fund, our 501(c)(4) organization. This also allows us to post appropriate electoral content. We use Facebook primarily to:

- Share breaking news or articles, and provide a space for fans to comment or discuss it
- Ask supporters to take action on online advocacy campaigns
- Promote website, video, and blog content
- Provide content that fans want to share with each other
- Create a way for supporters to personally connect with Cecile on her page

Locally, Planned Parenthood organizations also use Facebook to:

- Invite supporters to events, fundraisers, and activities
- Organize their student activists
- Ask online supporters to become offline activists
- Promote health center services, promotions, or discounts

Frequently Asked Questions

What is the difference between a page, profile or group?

- **Profile:** individual space for people to connect with friends. Organizations and businesses are not allowed to use profiles, they should create pages.
- **Group:** created by a personal Facebook profile to establish a community of people and friends that share and discuss relevant topics.
- **Page:** gives brands, companies and organizations a place to display their newest products, campaigns and initiatives with their supporters or customers. Pages are created specifically for public entities like us, so even though they are administrated through individual profiles, administrators are not acknowledged publically. Planned Parenthood organizations should have pages.

Should I create multiple Facebook Pages for new campaigns or departments?

- You may have many entities that interact with supporters (501(c)(3), 501(c)(4), PAC) but we recommend only one entity presence per social network (ie. You may want to position your Facebook page as advocacy work, so you 501(c)(4) entity might run that, while your MySpace page is more focused on health information and services, which your 501(c)(3) entity might run). Having more than one local entity on each site only serves to confuse your supporters.

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My teen group wants to create a presence on Facebook. What should I do?

- Let them have a presence, if they want. Take some time to clarify goals/ground rules up front, give them some message & best practices training, and check it frequently to give feedback. Your organization must maintain final authority over whether content may be posted.

How do I make sure people don't say the wrong thing on Facebook?

- This is the beauty and the frustration of the web--your users will not do what you tell them. You can offer opportunities, give them ways to get involved, but if your supporters really want to talk about Chlamydia, they are going to talk about Chlamydia. However, you must maintain a regular procedure of reviewing and removing, if necessary, posted comment. See comment guidelines.

How can I get users to do what I want them to do?

- Online activists are often super-advocates--when they're engaged in the issue. We can ask them to participate, give them cool stuff to do, and interact often. It's just as important to listen to our active supporters so we hear what they want, too.
- The other piece is not asking too much of them. Reach out when it's truly imperative to have online action.



YouTube is the leader in online video, and the premier destination to watch and share original videos worldwide through a Web experience. YouTube allows people to easily upload and share video clips on www.YouTube.com and across the Internet through websites, mobile devices, blogs, and email. The benefit of YouTube is its popularity and scope. With more than 17 percent of internet users visiting YouTube daily, it's considered the third most popular website online (www.alex.com).

Nationally, we primarily use videos to:

- Showcase the work of affiliates and give an inside look at our work through Cecile's video blog
- Provide information on health topics and services
- Share personal stories from patients, volunteers and supporters with decision-makers
- Give video statements to press

Locally, video can be used for sharing personal stories, successes and responses to local news. Your teen group may also be a source for excellent video content.

Note: we have created an easy "how-to" [video](#) about creating meaningful video content.

Frequently Asked Questions

Should I create separate channels for new campaigns?

- We have a separate PPFA, 501(c)(3), and Planned Parenthood Action Fund, 501(c)(4) channel. We've found having two broad sites to host all of our videos is best for our users. They allow our subscribers to follow all of our work. When there are new campaigns we can highlight new work in our profile image and of course, a separate 501(c)(4) channel is necessary to carry electoral material. Having a separate 501(c)(3) channel allows affiliates to take advantage of YouTube's non-profit program. This allows for advanced branding and donations.
- With YouTube there isn't a really efficient way to organize videos, but the playlist feature is a way to highlight featured campaign videos.

Should I pay someone to produce videos or can I make them myself?

- Expensive video does not always equal great video. Using equipment that is affordable and comfortable can produce compelling results. If cost is an issue, consider teens with video skills, college film students, local actors, and volunteers with video experience as potential resources. Check out this [video](#) for more tips.
- Online users are forgiving of lesser video and sound quality if the subject matter is worth their time.
- If you're struggling, ask yourself the following questions: Who is our intended audience? How will we promote this video? What information are we providing in this video?

How can I share the new videos?

- Use YouTube's embed feature to post the video on other websites. Videos can be embedded on local Planned Parenthood sites, social networking sites, blogs, and linked to via e-mail. The more places a video lives, the more viewers it will receive. Make sure you do not embed videos with electoral content on your 501(c)(3) sites or link to them from those sites.

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Are tags, descriptions, and titles important?

- You bet. Carefully choose the title, description, tags and thumbnail to accurately reflect the content of your video. Choosing popular tags, creating an interesting title, and picking the best thumbnail will make your video stand out in search results.



Twitter is a free social networking and micro-blogging service that allows users to send "updates" (or "tweets"; text-based posts, up to 140 characters long) to the Twitter website, via text message, IM, or a third-party application. Updates are displayed on the user's profile page and instantly delivered to other users who have signed up to receive them. The sender can restrict delivery to those in his or her circle of friends (delivery to everyone is the default). It's easy to forget but imperative to remember, Twitter is searchable, findable, and public.

Nationally, we use Twitter to:

- Provide a personal connection to Cecile with personal tweets
 - Promoting news, blog posts, and advocacy opportunities
 - Share interesting sites, resources, or organizations
- On the national level, Twitter is run by Planned Parenthood Action Fund, our 501(c)(4) organization.

Already, local Planned Parenthood organizations are using Twitter as a mode to feed information to their supporters more immediately, and create a personal closeness to the organization.

Check out this article about using Twitter effectively:
<http://www.nytimes.com/2009/05/21/fashion/21whiz.html?em>

Frequently Asked Questions

Can I put URLs in my tweets?

- Yes, and we encourage you to. Use one of the following websites to shorten your URL thus maximizing your character limit: www.tinyurl.com & <http://bit.ly/>

Lila Rose is following me. What do I do?

- It's your call to block or let anti-choice people or organizations follow you. No matter which you choose, know that anti-choice individuals will follow you. Having them visible on your list may be a good reminder that anything you post on your Twitter feed is public, and general security (and message) concerns apply.
- You should have a general policy about which followers you allow and delete those you do not approve. See comment guidelines.

What do I do about anti-choice @replies?

- Do not interact with any anti-choice activity. Please contact PPFA Security if you are experiencing violent threats or a user who is continually problematic.

What are general security rules?

Follow the security rules outlined above. Use Twitter to alert activists to public events and communicate other public information, not to post personal information about you or anyone else.



MySpace offers an interactive, user-submitted network of friends, personal profiles, blogs, groups, photos, music, and videos. MySpace also features an internal search engine and an internal e-mail system. As of November 2008, MySpace had 126 million unique visitors.

Nationally on MySpace, we find that younger audiences come to www.MySpace.com/plannedparenthood for information on health topics and to show support of our mission. Users tend to ask questions about birth control, pregnancy and STDs. The national MySpace page is run under the name of PPFA, our 501(c)(3) organization.

Locally, MySpace is a great opportunity to share reproductive and sexual health information in a safe space. It's also good for connecting with other local organizations.

Frequently Asked Questions

How should I design my profile?

- Your contact information and logo should be easy to spot on your profile. Graphics should be exciting, but more importantly clean and simple. Extravagant profile designs can cause older computers and those with slow internet connection to crash or freeze. Be sure to test your design in popular browsers, too (Internet Explorer, Firefox, Safari, Google Chrome).

How should I interact with my friends?

- Post "thanks for the add" and "happy birthday" comments which both advertise your profile on friends' pages and connect you to supporters. You can use images from PPFA's MySpace page to do this, and embed the link to your MySpace profile within the code.

How can I build my friend list?

- Add other Planned Parenthood affiliates. Add friends of friends who are commenting on our issues on their friend's profile. Add a link to your MySpace page to your organization's website. Follow [Quick Guide on New Media](#). Promote the link to your MySpace page in print materials. Approve friend requests and comments daily.

Should I even bother with MySpace?

- Despite slowed growth rates, at 126 million unique visitors, MySpace is still a major competitor. If you're wondering whether it's right for your audience, ask potential members whether they use it: health center clients, activists, peer educators, or staff.



Blogs and website content

"Blog" is short form for "web log," essentially an online, public diary. There is a blog for everything, from dog biscuits to dating with Herpes. Not all good mind you, but they exist.

At the national office, we think a great blog uses a unified voice, is authentic, short 'n' sassy and links to other sources.

Currently at the national office, we maintain a single blog on the Planned Parenthood Action Fund website:, www.plannedparenthoodaction.org/blog.

We use our blog to:

- Provide more information on current events, health topics, or advocacy opportunities
- Give in-depth information about Planned Parenthood programs, from international work to youth programs

Locally, Planned Parenthood organizations use blogs to talk about breaking news, respond to policy decisions, comment on recent sexual health studies, promote events, etc.

A few examples are:

- The Activist (<http://theactivist-pprm.blogspot.com/>): Advocacy, news, and current events
- Good Chemistry (<http://www.good-chemistry.org/>): Environment and health
- 'NYC Unrated Unfiltered (<http://unratedunfiltered.com/>): Advocacy, news, and current events

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Comment Guidelines

Comments, Followers, Fans and Friends: Developing a Policy to moderate and control content posted by others.

New media are unique in allowing an unparalleled level of instantaneous, interactive communications. However, we must be aware that content posted by others may, in certain circumstances, be attributed to us. Also we do not want to play host to causes and comments that are antithetical to the Planned Parenthood mission or unjustifiably hurtful to others.

On the other hand, messages from the public are a wonderful thing. They help us learn about our audience and gauge how our messages are being received. Debate and discussion stimulate a wider audience. There is, however, a delicate balance between healthy debate and unhealthy harassment.

Review processes vary from site to site. Here's what you need to know:

- Have one person assigned to review all comments and requests to friend, follow or be a fan on a regular basis, preferably daily, and exercise your authority to edit or deny access wherever possible and appropriate.

Moderating Comments

- The national office to review and post comments to the blog, so nothing goes up on the site without our approval.
- **Facebook** does not allow comments to be reviewed before they're posted, so you must be vigilant about checking comments and deleting them if necessary. If you must delete a comment on Facebook, it's also a good idea to "Report" (by clicking the button under the comment) before you delete it to try to ban harassers from your Page
- Like the Action Fund blog, **MySpace** allows you to pre-moderate all user generated content before it's posted. If this isn't happening, make sure the privacy settings are set to pre-moderate. If you are receiving anti-choice comments and messages from users, feel free to block that particular user.
- **YouTube** is flexible, so you can pick whether you'd like to approve comments before posting or delete them after the fact if necessary. We recommend pre-review The YouTube community is a little more dedicated to conversation and the exchange of ideas, so this may be the one place where you can exercise leniency when moderating anti-choice comments (but all extreme, violent, offensive, disrespectful comments should be deleted regardless.)

Sample comment review procedures and policy (followed at the national office):

- Delete comments that are racist, sexist, homophobic, or derogatory toward another commenter or the subject matter under discussion.
- Delete comments containing excessive profanity.
- Anti-choice comments are moderated on an individual basis. Anti-choice comments that are also respectful may be allowed, but keep in mind that the very people that depend on us for care are often on our pages, and it's our job to protect them from harassment or comments containing misinformation about medical procedures. While there is merit to free speech and discussion, these web properties belong to Planned Parenthood, and it's not our job to provide anti-choice individuals with a space to air their views.

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- Electoral comments must be deleted on 501(c)(3) sites, where possible . Electoral content on 501(c)(4) sites must follow state and federal election laws. See [Quick Guide: 501\(c\)\(3\)/501\(c\)\(4\) New Media](#).
- Forward threatening comments to your Security officer, then delete them.
- Delete spam that appears in the comments section.
- Individuals requesting more information may be messaged directly (if possible) or responded to in the comment section (use your best judgment).

Sample friend, follow and fan request procedures and policy: For guidelines on complying with tax and election laws on friends, followers and fans, see [Quick Guide: 501\(c\)\(3\)/501\(c\)\(4\) New Media](#).

The following friends, followers and fans are denied

- Anyone with Nazi/racist propaganda.
- Anyone with obviously sexist content on their page.
- Anyone with anti-choice content on their page.

Note: The beauty of Planned Parenthood is that we attract fans from all walks of life, all religions, all creeds, etc. And they can all be our supporters online. It is generally known that our friends don't necessarily represent us – and sometimes people will have seemingly unprogressive views but still support Planned Parenthood. So, at the national office, we are generous in allowing friends of varied views and lifestyles.

Quick Guide: 501(c)(3)/501(c)(4) New Media

The following guidelines are designed to help Planned Parenthood 501(c)(3) and 501(c)(4) organizations use new media without running afoul of (1) the federal tax law that forbids 501(c)(3) organizations from intervening in elections and (2) federal and state election laws.

Definitions

As used in this Quick Guide:

- “New media” means all digital media in which Planned Parenthood organizations communicate with the public: websites, blogs, YouTube, podcasts and social networking sites, such as Facebook, MySpace and Twitter.
- “Sites” means Planned Parenthood’s presence on any new media. Sites include “unofficial” Planned Parenthood sites used to post staff blogs.
- “Websites” is used when the advice is specific to that medium.

Do not post, or allow to be posted, partisan electoral material on a 501(c)(3) site.

- Do not post materials (including tweets) supporting or opposing candidates, advocating a pro-choice result in a coming election or urging the public to vote pro-choice, for pro-choice candidates, or for candidates who support our mission. For details on appropriate 501(c)(3) messages, see “Do’s and Don’ts for Public Affairs Activities During an Election Campaign,” available on the Extranet.
- Do not allow outside individuals and organizations to post comments or other materials on your 501(c)(3) site that would violate the rules against electoral activity by 501(c)(3) organizations. However, on certain sites, removing these materials is not practical. See advice below for Facebook and Twitter.
- *MySpace*: do not friend candidates or political parties. Do not allow candidates or political parties to be friends of Planned Parenthood. Remove friends who include partisan political messages in their icons.
- *Twitter*: do not follow candidates or political parties or invite them to follow Planned Parenthood. However, because it is impractical to do so, you need not remove candidates and political parties who follow Planned Parenthood on their own initiative.
- *Facebook*: do not post candidates or political parties as favorites or invite them to be Planned Parenthood’s fans. However, because it is impractical to do so, you need not remove candidates and political parties who become Planned Parenthood fans on their own initiative.
- Do not post links to candidates, campaigns or political parties.
- *Retweeting*: you may retweet 501(c)(3)-appropriate materials from 501(c)(4) entities on Twitter, even though the original site had electoral material; however, do not retweet electoral messages from 501(c)(4) Twitter sites or anything from candidate or political party sites.

- Do not raise funds for Planned Parenthood 501(c)(4) organizations or promote their fundraising events. You may, however, notify the public of 501(c)(4) events that are geared toward a policy or legislative goal and have no electoral or fundraising content.

Keep sites separate and distinct.

- Use separate sites for 501(c)(4) and 501(c)(3) organizations.
- Clearly brand each site with the name of the organization hosting it. For 501(c)(4) sites, prominently explain that the organization is separate and distinct from related 501(c)(3) organizations. As an example: “This Facebook page is operated by Planned Parenthood Action Fund of Gotham, Inc., the 501(c)(4) advocacy organization for Planned Parenthood of Gotham.”
- Websites should have separate URLs. Side bar and navigational features of websites should maintain the distinction between the organizations. For example, “About Us” on a 501(c)(4) website should be about the 501(c)(4) organization and not link back to the 501(c)(3).
- Shared 501(c)(3) and 501(c)(4) websites are not recommended and are not permitted for Planned Parenthood Online participants. If you wish to maintain a shared website, please contact a lawyer at the PPFA Office of the General Counsel.
- Do not raise funds for your 501(c)(4) organization on your 501(c)(3) site.

Hyperlinks from 501(c)(3) sites to 501(c)(4) sites.

Text of Link

If a Planned Parenthood 501(c)(3) organization provides a hyperlink from its site to material posted by its 501(c)(4) organization, the link should be neutrally worded with respect to elections and voting. Some possible examples for the text of such a link are:

- “Follow Planned Parenthood Action Fund of Gotham, our advocacy arm, on Twitter.”
- “Planned Parenthood Action Fund of Gotham,” carried as a footer on each page of the 501(c)(3) website site, along with hyperlinks to other Planned Parenthood web presences, such as teenwire.org.
- “Get Election Information.” Making this selection takes the visitor to the 501(c)(4)’s homepage.

Avoid such text as:

- “For information on voting pro-choice, go to the Facebook page of our advocacy arm, Planned Parenthood Action Fund of Gotham.”
- “Find out where the candidates stand on choice, go to the website for Planned Parenthood Action Fund of Gotham.”

Embedded Pop-up Disclaimer

Where technologically possible, links from 501(c)(3) sites to 501(c)(4) sites should include a pop-up window with a disclaimer that indicates that the visitor is leaving the 501(c)(3) web presence and going to materials posted by a 501(c)(4) organization.

501(c)(4) Website Landing Page Content

When a 501(c)(3) links to a Planned Parenthood 501(c)(4) organization's website, the link should take the visitor to the 501(c)(4)'s homepage only. The 501(c)(4)'s homepage should not contain candidate endorsements or other specific candidate information. From the 501(c)(4) homepage, the visitor should then be required to choose hyperlinks to candidate information within the 501(c)(4) site. *Do not "deep link" from the 501(c)(3) websites to candidate information within the 501(c)(4) site.*

Rules for 501(c)(4) sites.

- *Friends, Followers, Favorites, and links:* Because federal law bars corporations from assisting federal candidates, do not friend or be friended by (MySpace) federal candidates or political parties, provide links to their campaigns, follow them (Twitter) or post them as favorites (Facebook). Follow the same rules if state law has the same prohibition on corporations assisting candidates. Even if state law allows these postings, reporting to state authorities may be required.
- However, because it is impractical to do so, your 501(c)(4) Facebook and Twitter sites need not ban Fans or Followers who are candidates or political parties.
- Your own postings and comments of others that are visible on your organization's site should be carefully monitored to ensure that they do not violate federal or state campaign finance laws or Planned Parenthood endorsement policies. See "Federal Elections 2008: Legal Guidelines for Planned Parenthood 501(c)(4) Organizations," available on the Extranet.

Train staff and institute a regular monitoring process.

Staff-posted content: Make sure all staff who post materials on organizational sites are trained in the above rules. In addition, institute a practice of auditing all staff-posted new media content periodically (for example, weekly or monthly) to ensure that the rules are followed. However, during election season, a daily or more frequent review may be appropriate.

Content posted by outside individuals and organizations: Staff should monitor comments and other materials posted by outside individuals and groups on a daily basis to ensure that they do not violate legal rules or agency policy. The organization should have a set of written criteria for disallowing such postings.

Accurately allocate costs.

- As for all costs shared by 501(c)(3) and 501(c)(4) organizations, each organization must pay its fair share to ensure that the 501(c)(3) does not subsidize the 501(c)(4). In the case of much social networking new media, the only costs involved are staff time. The 501(c)(4) should pay the 501(c)(3) for the time shared staff spends working on the 501(c)(4) sites and content.
- In the case of websites, each organization must pay its own hosting and other fees to the internet provider. If the organizations share a website (not recommended), the costs should be allocated. One method is to allocate the costs in proportion to the webpages posted by each organization. If the number of pages changes frequently the allocation should be periodically revised.
- Be sure that the 501(c)(4) pays the 501(c)(3) for its share of costs, either in advance or by timely reimbursements, and in no case should reimbursements be made more than 30 days after the 501(c)(3) pays the expense.

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Blogging Policy

Planned Parenthood of Montana (PPMT) recognizes that employees and volunteers may engage in “blogging” while off duty. “Blogging,” for purposes of this policy, means posting information on your own, or on someone else’s, Web log, journal or diary on the Internet. “Blogging” also includes any other form of posting information on the Internet, such as postings on a personal Web site, social networking or affinity Web site, on a bulletin board, or in a chat room.

Employees and volunteers who engage in blogging should be mindful that their postings, even if done off premises and while off-duty, could have an adverse affect on PPMT’s legitimate business interests and the privacy interests of its patients. For example, the information posted could be PPMT’s trade secret, confidential business information, place PPMT or its patients and clients in a bad position, or reveal information about a patient from which he or she could be identified. In addition, some readers may view you as a *de facto* spokesperson for the affiliate. To reduce the likelihood that your personal blogging will have an adverse affect on PPMT and the patients we serve, we require that you observe the following guidelines:

- **Do not engage in blogging using any corporate electronic resources. This means that PPMT’s property, including but not limited to Internet access, computer hardware and software, may not be used by an employee for blogging without the express prior written consent of the PPMT’s CEO**
- **Your blogging is subject to all of the policies in our employee Handbook, (i.e.- Workplace and Sexual Harassment, “Confidentiality, HIPAA privacy statement and Electronic Communication).**
- **If your blogging includes any information related to PPMT please do the following:**
 - **Make it clear to your readers that the views expressed are yours alone and that they do not reflect the views of PPMT by stating, for example, “*The views expressed in this blog [or blog posting] are my own. They have not been reviewed or approved by Planned Parenthood.*”**
 - **Do not discredit, disparage or defame the mission or services of PPMT its staff, supporters, patients or partners.**
 - **Do not use the PPMT’s logo, trademark, or proprietary graphics, photographs of the affiliate’s premises, employees, clients or patients.**
- **Your blogging may not discuss individual clients or patients. This rule applies even if you think you have protected the patient’s or client’s confidentiality by omitting identifying information, such as names and addresses. There are many ways to deduce a person’s identity without such information, so we must ask that you not discuss individual clients and patients at all. We take our patients’ and clients’ privacy very seriously and expect that our employees and volunteers will as well.**

You also should consider the following if your blogging includes any information related to PPMT:

- **PPMT has spent substantial time and resources building its reputation and good will. These are valuable and important corporate assets. Before you make any posting in a blog that identifies yourself as an employee of PPMT or that identifies PPMT, please consider whether you are damaging the affiliate's reputation. If you are uncertain, you should consult your supervisor or the Human Resources Department before making the posting.**
- **You are more likely to resolve complaints about work by speaking directly with your co-workers, supervisor or other management-level personnel than by posting complaints in a blog. If you, nonetheless, decide to post complaints or criticism, avoid doing so in a way that is defamatory or damaging to PPMT or any of the affiliate's employees or be prepared to face possible consequences.**
- **These policies apply even if your blogging is anonymous or under a pseudonym. If you do engage in such blogging, you should be aware that in appropriate circumstances the affiliate will take steps to determine your identity.**
- **PPMT may require in its sole and absolute discretion that you temporarily confine your blogging to matters unrelated to PPMT if the affiliate determines this is necessary or advisable to ensure compliance with law or protect the interests of PPMT or those of its patients.**
- **If you need clarification of any aspect of this policy, contact your supervisor or the Human Resources Department. Failure to comply with this policy may lead to appropriate disciplinary action, which may include termination, and if appropriate, the affiliate will pursue all available legal remedies. Volunteers may be barred from providing further services to PPMT.**

I have read and understood the above-stated blogging policy. I accept it and understand that it is a condition of my employment with Planned Parenthood of Montana or my continued service as a volunteer.

Volunteer Signature _____ Date _____

Volunteer Name _____ Date _____