SOCIAL MEDIA LEGITIMACY: A NEW FRAMEWORK FOR PUBLIC PARTICIPATION, AND THE BEHAVIOR OF ORGANIZATIONS

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ABSTRACT

Public engagement via social media is not treated as legitimate citizen participation. Too often, participation via social media fails to lead to informed decision-making, better public policies, or stronger service delivery. In this thesis, I detail barriers to social media legitimacy in participation, including current laws and organization behaviors. Using Arnstein’s ladder of participation as a theoretical foundation, I propose a new evaluative framework for public participation – a Social Media Participation Range. The framework offers a new evaluative tool for researchers and practitioners to analyze citizen participation via social media.

In this study, I have found that information from social media is discounted by organizations compared to information from traditional sources, whether public meetings or news sources. Public participation via social media lacks legitimacy, and many organizations use social media only in superficial and tokenistic ways. Citizens are currently not well served by opportunities to provide substantive comments about public issues and decisions via social media. In most cases, the initial discounting of information from social media is followed by a series of low impact internal organizational practices, buoyed by particular organizational beliefs, which provide a false view of the value of the information or risk posed by it. Many of the organizations studied displayed a low level of organization care toward social media and perceived social media as low risk, which leaves organizations vulnerable. In this study, I provide a framework – Social Media Risk/Care Axis – to help explain this phenomenon. I identify a number of public policies that should be changed to eliminate bias against social media. It calls for organizations to adapt in order to maximize the opportunities that social media presents to improve government decision making.
# TABLE OF CONTENTS

ACKNOWLEDGEMENTS ................................................................................................................. 2

ABSTRACT ..................................................................................................................................... 3

Chapter 1: Introduction ................................................................................................................ 9
  Literature Review .................................................................................................................. 10
  Critical Review .................................................................................................................. 25

Chapter 2: A New Framework: Social Media Participation Range ........................................ 28
  Tier 1: Social Media Non-Adoption ................................................................................. 30
  Tier 2: Social Media Non-Participation ........................................................................ 32
  Tier 3: Social Media Tokenism ....................................................................................... 33
  Tier 4: Social Media Legitimacy ...................................................................................... 35
  Conclusion .......................................................................................................................... 37

Chapter 3: Methods .................................................................................................................... 39
  Limitations ........................................................................................................................ 46
  Ethics ................................................................................................................................. 47

Chapter 4: Results...................................................................................................................... 49
  Respondents ....................................................................................................................... 49
  Comparing Treatment of Social Media and Traditional Media .................................... 53
  Comparing Treatment of Comments via Social Media and Public Meetings .................. 60
  Analyzing the Role of Senior Leaders .......................................................................... 61
  Analyzing the Role of Beliefs about Social Media ....................................................... 62

Chapter 5: Conclusions .............................................................................................................. 65
  Public Comments via Social Media ................................................................................. 65
Role of Senior Leaders .................................................................70
Internal Sharing .................................................................................74
Information Sharing as Stimuli ..........................................................78
Organizational Structure .................................................................80
Organizational Beliefs ........................................................................83
Social Media Risk/Care Axis ............................................................85
Recommendations .............................................................................88
Conclusion .........................................................................................93

References ........................................................................................96

Appendix A: Institutional Research Board Approval Letter ..................100
Appendix B: Recruitment Scripts .......................................................101
Appendix C: Interview Participant Consent Form ...............................105
Appendix D: Interview Guide ............................................................106
Appendix E: Survey Participant Consent Form and Survey .....................109
LIST OF TABLES

Table 4.1. Description of Respondent Organizations .......................................................... 50
Table 4.2. Description of Respondent Job Titles ............................................................... 51
Table 4.3. Description of Respondent Characteristics ....................................................... 53
Table 4.4. Code Book for Paired T-Test Variables ............................................................. 54
Table 4.5. Internal Sharing of Information ........................................................................... 55
Table 4.6. Code Book and Descriptives for Share Categories ............................................. 56
Table 4.7. Organizational Stimuli and Response/Change ..................................................... 58
Table 4.8. Involvement of Ranking Officials ....................................................................... 59
Table 4.9. Senior Leader Concern ...................................................................................... 60
Table 4.10. Analysis of Variance ......................................................................................... 60
Table 4.11. Reasons Social Media Comments Receive Less Weight .................................... 61
Table 4.12. Reasons Social Media Comments Receive Less Weight .................................... 61
Table 4.13. Role of Senior Leader ...................................................................................... 62
Table 4.14. Beliefs about Social Media ............................................................................... 64
Table 5.1. Senior Leaders and Social Media ....................................................................... 71
LIST OF FIGURES

Figure 1.1. Arnstein's Ladder ........................................................................................................ 12
Figure 1.2. How People Get Their News...................................................................................... 17
Figure 2.1. Social Media Participation Range…………………………………………………...30
Figure 5.1. Social Media Risk/Care Axis......................................................................................86
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>3CMA</td>
<td>City-County Communications &amp; Marketing Association</td>
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<td>APTA</td>
<td>American Public Transportation Association</td>
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<td>CASE</td>
<td>Council for Advancement and Support of Education</td>
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<td>CEQ</td>
<td>Council on Environmental Quality</td>
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<td>EIS</td>
<td>Environmental Impact Statement</td>
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<td>Federal Transit Administration</td>
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<td>IAP2</td>
<td>International Association for Public Participation</td>
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<td>ICT</td>
<td>Information Communication Technologies</td>
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<td>IRB</td>
<td>Institutional Research Board</td>
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<td>MPO</td>
<td>Metropolitan Planning Organization</td>
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<td>NAGC</td>
<td>National Association of Government Communicators</td>
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<td>NEPA</td>
<td>National Environmental Policy Act</td>
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<td>NYDEC</td>
<td>New York State Department of Environmental Conservation</td>
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<td>USDOT</td>
<td>United States Department of Transportation</td>
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<td>SAFETEA-LU</td>
<td>Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users</td>
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<tr>
<td>SAS</td>
<td>Scanning, Assessing, and Sharing</td>
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<td>TCRP</td>
<td>Transit Cooperative Research Program</td>
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<td>TSA</td>
<td>Transportation Security Administration</td>
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<td>UTAUT</td>
<td>Unified Theory of Acceptance and Use of Technology</td>
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Chapter 1

Introduction

A distinction of American democracy is its citizen participation in public issues, particularly at the local level. In his famous 1835 work, Democracy in America, de Toqueville marveled at the prevalence of local associations and citizen participation in America as compared to Europe, typified by New England town meetings. There is little dispute, at least from a comparative perspective, about the abundance of opportunities available for such participation in the United States (U.S.) today. Through the years, American law has institutionalized citizen participation in governmental decision-making processes. The 20th century saw a number of federal laws enacted that set requirements for citizen participation in rulemaking ("Administrative Procedure Act," 1946), the operation of agency advisory committees ("Federal Advisory Committee Act," 1972), and federally-funded major projects ("National Environmental Policy Act," 1969). At the local level, many planning commissions require public hearings for zoning issues.

Despite the intentions of these laws to support citizens’ rights to participate in their government, these legally mandated processes are widely criticized for being unproductive, inefficient, and damaging to public trust (Nabatchi & Leighninger, 2015). I am concerned that prescribed methods of public participation are outdated and insufficient, stymieing participation, particularly amongst younger generations. For example, National Environmental Protection Act (NEPA) regulations make no mention of social media and instead emphasize public meetings and hearings. Yet, social media networks, chock full of debate of public issues, are today’s town halls or public squares of yore. I am concerned that engagement via social media is not treated as legitimate citizen participation. Too often, citizen engagement via social media fails to lead to
informed decision-making, or better public policy and service delivery. And this concern extends beyond what is found in law; organizational barriers also prevent social media from being treated as legitimate citizen participation.

The goal of my study is to catalyze government to embrace social media as legitimate citizen participation. In order to achieve this goal, we need to know how public agencies currently treat citizen participation via social media and how they could be changed to maximize opportunity. To describe the range of treatment of social media as citizen participation, I will develop a conceptual framework for its evaluation, based on Arnstein’s ladder of participation, which will benefit future researchers and practitioners. My project will identify organizational barriers to the use of social media as legitimate citizen participation and recommend changes for public agencies.

With this knowledge, a foundation can be laid for policy makers to discuss the improvement of laws that currently inhibit social media as a form of legitimate citizen participation. Public agencies can use this information to better meet public expectations and transform their internal operational models to support social media as legitimate citizen participation. To legitimize citizen participation without regard for historic biases toward particular communications methods, best practices could address organizational structure, models for internal information sharing, and the personal adoption of technology by senior leadership. Current laws and agency practices result in important voices of our citizens not being heard. Yet with modest changes, a government which is more responsive to its citizens is within our reach.

**Literature Review**

Social media refers to web-based communications platforms that allow users to generate
their own content and interact with one another and is based on collaboration, information sharing, and feedback (Transportation Research Board, 2013). Social media includes blogs, micro-blogs, social networking platforms, and media sharing. Contemporary social media platforms whose adoption is commonly measured by researchers include Facebook, Twitter, Instagram, LinkedIn, YouTube, and Pinterest (Bertot, Jaeger, & Grimes, 2012; Bonsón, Torres, Royo, & Flores, 2012; Duggan & Brenner, 2013; Thackeray, Neiger, Smith, & Van Wagenen, 2012; Transportation Research Board, 2013).

**Theoretical Foundation: Ranges of Public Participation.** Researchers have sought to describe the range of public participation that citizens and government experience and organize its different types and qualities. A seminal work by Sherry Arnstein (1969) sets out a framework of public participation – a “ladder” with eight rungs or levels. The lowest rung represents a state of “non-participation” whereby the public is not afforded participation opportunities or is manipulated by government. Ascending up the ladder, the next levels represent a state of “tokenism” whereby the government provides public participation that amounts to “consultation” or “informing.” It is only at the highest levels of this ladder that citizens share any power, from a state of “partnership” all the way up to the highest level, “citizen control.”
Figure 1.1. Arnstein’s Ladder

ARNSTEIN’S LADDER OF PARTICIPATION (1969)

CITIZEN POWER

1. MANIPULATION
2. THERAPY
3. INFORMING
4. CONSULTATION
5. PLACATION
6. PARTNERSHIP
7. DELEGATED POWER
8. CITIZEN CONTROL

NON PARTICIPATION

TOKENISM
Another description of citizen power in terms of social media might be “citizen co-production.” Linders (2012) examines how social media and web 2.0 has led to the re-emergence of citizen co-production which treats citizens more as a “partner,” paving the way for both increased opportunity and responsibility for achieving desired societal outcomes. Social media, because of the ease in which information is shared and connects citizens, can multiply government’s ability to leverage the eyes, ears and smartphones of citizens for the public good. For example, citizens of New York dealing with the devastation of hurricane Sandy in 2012 alerted fellow citizens about government emergency services by “retweeting” agency messages (Chatfield, Scholl, & Brajawidagda, 2014).

Arnstein’s very influential framework has been the basis of study, been built upon, and critiqued by researchers over the last forty years. In four case studies concerning habitat protection, Brooks found that public participation was mostly in the token category (Brooks & Harris, 2008). Other researchers have described the range of public participation experiences in terms of “authenticity” (King, Feltey, & Susel, 1998). “Conventional participation,” described as ineffective, is contrasted with “authentic participation,” which is characterized by collaboration, partnership, and trust. King’s authentic participation could only exist at the upper end of Arnstein’s ladder. King lists four parts common to all public participation – issue, administrative systems/processes, administrators, and citizens. In a conventional participation context, the issue and citizens are separated by administrative systems/processes, which provide the rules, and administrators, who are the experts and gatekeepers. In this structure, citizens have little role to play in defining or meaningfully addressing issues. Citizen participation is structured to be reactionary. Authentic participation provides a model of citizen participation whereby the same four parts are re-ordered, allowing citizens and administrators to work in concert to address the
issue (King et al., 1998). The prescribed NEPA public involvement requirements are reminiscent of the conventional model of participation which puts distance between citizens and the issue.

The International Association for Public Participation (IAP2) has also developed a useful range of public participation—a “spectrum”—that is becoming an international standard for practitioners in defining the public’s role in the process. The spectrum has six categories that range from informing, the lowest level of impact on public decisions, up to empower, the highest level of impact on public decisions (International Association for Public Participation, 2014).

Ubiquity & Opportunity for Citizens. Today, social media use in the U.S. transcends racial, age, and gender populations. Seventy-three percent of all adults on the internet use social media, almost all of whom (71%) use Facebook. Younger internet users are most likely to use social media with 84% of all users between the ages of 18 – 29 on at least one social media channel. But social media use amongst older adults is growing too: today, 45% of all adults 65 years of age or older use Facebook (Duggan & Brenner, 2013).

Millennials (those born after 1980 with no chronological end point at this time) are the most unattached to traditional institutions than any generation in recorded American history, but they are the most connected to networks of friends on social media. Millennials are less attached to political and religious institutions and traditional social institutions, such as marriage (Pew Research Center, 2014). It is not a stretch to assume this detachment extends to their interface with government bodies and civic engagement, which has implications for public participation design. Research should explore this topic specifically, as well as user expectation on social media; if Millennials were to participate in government decision-making, do they believe that social media is a legitimate venue for it?

Furthermore, social media strategies present an opportunity for agencies to increase
citizen participation amongst vulnerable populations by providing access through a low-cost and non-threatening medium. The digital divide – the chasm between those who have easy access to technology and those without (for example: in-home high speed internet access versus no access) – remains but is narrowing. This is particularly true amongst younger people with smart phones. Researchers found no statistically significant difference between blacks and whites when it comes to smartphone ownership, and 98% of all blacks between ages 18 – 29 have either a broadband connection at home or a smartphone (Smith, 2014). Use of specific social media platforms varies across racial/ethnic groups. Young blacks (40%) are more likely to use social media platforms like Twitter than young whites (28%) (Smith, 2014). On Instagram, which 17% of all adults on the internet use, blacks (34%) and Hispanics (23%) are more likely to be users than whites (12%) (Duggan & Brenner, 2013).

**Power & Potential for Government.** Governments and public officials have embraced social media for a variety of reasons. Researchers found that information communication technologies (ICT), including social media, serve to make government more transparent and open, reduce corruption, and increase citizen participation in their government (Bertot, Jaeger, & Grimes, 2012). For example, it was noted that, despite being closed off from traditional media, the world was able to see into the protests, riots, and aftermath of the 2009 Iranian election because of the heavy use of microblogging, mostly on Twitter, by Iranians “self-reporting” the activities (Bertot et al., 2012). In the U.S., tweets from news reporters about heavy-handed police tactics against protestors of a police shooting in Ferguson, Missouri captured the nation’s attention and led to a convergence of the national press corps on the town to cover the story (Tau, 2014). Self-reporting and digital innovations, such as live streaming mobile apps, are putting paid journalists, who are in a rush to break news, in competition with ordinary citizens
The rise of social media and self-reporting has also corresponded with a decline in the role of newspapers, a traditional American institution, as evidenced by advertising revenues, the number of employees, and closing of newspapers (Kaiser, 2014). And losses are not reserved for local newspaper outfits; big brands have also taken major hits. In 1993, The New York Times Co. bought the Boston Globe for $1.8 billion; it was sold in 2013 for only $71.2 million (Mitchell & Matsa, 2015). In 2013 Amazon.com Inc. founder Jeff Bezos surprised many when he agreed to buy the Washington Post for $250 million. Although a hefty sum, experts speculate the paper would have fetched $2 billion only ten years prior (Irwin & Mui, 2013).

Technology has diffused the sources from which people get news. Today, over 40% of Americans get their news from social media (see Figure 1.2) (Kaiser, 2014). Smartphone and social media use has become so commonplace that the average user checks in to Facebook using their phone by 7:31 AM. Even before they’ve gotten out of bed to use the bathroom, most use their smart phone to read the news and peruse other information (Woollaston, 2014).
Social media has proven adept not only to capture events, but also to drive them. For example, social media played a “crucial” role in the closing of a U.S. university (University of South Florida Polytechnic), as the discussion of independence that preceded its closure was fomented primarily by local news media on Twitter (Kelling, Kelling, & Lennon, 2013). In 2015, President Obama became the first U.S. president to establish a personal Twitter account (Shear, 2015), joining Pope Francis who has been communicating via the medium since 2012. This
evidence of the power of social media exposes its potential if properly harnessed by government for its citizens.

Government has responded to the ubiquitous nature of social media by adopting social media platforms to communicate with citizens, which is a necessary step to legitimizing citizen participation on social media. From transportation to healthcare to higher education, government agencies are taking to social media. In a 2012 study, researchers found that 100% of higher education institutions surveyed had an institutional presence on Facebook, 94% were on Twitter, and 92% on YouTube/Vimeo (Syme, 2012). That same year, another study showed that 60% of state health departments in the U.S. used at least one social media application, 86% had a Twitter account, 56% had a Facebook page, and 43% had a YouTube account (Thackeray, Neiger, Smith, & Van Wagenen, 2012). Most local governments within the European Union (EU) use multiple web 2.0 strategies for transparency purposes (Bonsón, Torres, Royo, & Flores, 2012). Since many of the most popular social media platforms are free to subscribers, including organizations, there’s no reason to expect a slowing in agency adoption.

**Barriers to Social Media Legitimacy.** Social media adoption and even engagement should not be mistaken for legitimate citizen participation in public issues via social media. For example, there is a vast difference in using social media to make the public aware of a forthcoming public hearing and comment opportunity on an issue and actually using social media to generate public comments to the issue as an alternative to meeting attendance. The former use is an attempt to drive citizens to participate in a “traditional” way, often designated as official; the latter use legitimizes the participation of the citizens using the medium in which they are, arguably, most comfortable and declares it sufficient.

A strict adherence by agencies to methods through which “formal comments” can be
submitted is nothing new. Brooks and Harris (2008) found that public participation programs of the New York State Department of Environmental Conservation (NYDEC) ignored meetings organized by the citizen groups themselves; they failed to capture relevant input from citizens outside public meetings deemed official by NYDEC. In the social media realm, there is a lack of guidance for public transit agencies about whether to include comments received in this medium in the administrative project record. Citizens are told their comments on social media will not be considered “formal” in the outreach program and must submit them by other means (Transportation Research Board, 2013), which is evidence of bias toward citizen input received through traditional channels. This is to say nothing of the organizational allegiance to traditional requirements that have their own failings.

Values in Government. Contemporary values regarding the roles of government and citizen in public affairs also serve to constrain the legitimization of citizen participation through social media. Although not widely embraced, there is a movement toward “deliberative” public participation whereby issues are debated and solutions mutually agreed upon (Abelson et al., 2003). The “short-hand” nature of social media (e.g. only 140 characters per tweet) and its remote use present challenges for public administrators attempting to foster such deliberation which requires listening, considering alternatives, and compromise. To address this gap, initiatives such as Cornell E-Rulemaking Initiative (CeRI) are dedicated to finding innovate ways to increase the quality and magnitude of citizen engagement in the rulemaking process. CeRI employs web and social media strategies to garner citizen interest in rulemaking and encourage their participation. The CeRI RegulationRoom works to improve the awareness of particular rules and the quality of the comments submitted by citizens (Farina & Newhart, 2013).

A competing government value is the pursuit of efficiency, as articulated by the New
Public Management paradigm of administration. Such efforts to streamline government processes have served to circumvent public participation. One study found that government reform efforts have resulted in the development of fewer Environmental Impact Statements (EIS) for major projects which trigger public involvement requirements (Turina, 2001). Arnstein would say that development of less full-blown EIS results in non-participation. Social media, however, presents real opportunity to capture citizen input at a low cost and with little delay. Not only is input from citizens available on modern communications technologies, but capturing this input is faster and cheaper than the deployment of traditional techniques (Turina, 2001).

Supporters of efficiency might oppose any increased public participation requirements due to the potential for increased legal challenges of major public projects with claims that citizen rights to participate were violated. NEPA is already a highly litigated statute, as seventeen challenges to the law have already been heard by the U.S. Supreme Court since its enactment in 1969 (Lazarus, 2012). The extent to which increased citizen participation is a driver of those suits is not clear from the literature. Growth of project records due to the increase in substantive public comments through social media might provide additional grounds for challenge.

**Laws and Regulations.** Laws and regulations are inhibiting social media as legitimate citizen participation either because of the outdated methods prescribed or their silence on the issue which allows for agency discretion. Outdated laws perpetuate failed public participation formats, one of the most common of which is the traditional three minutes speakers are allocated to address their elected representatives (Leighninger, 2014).

Congress has institutionalized public participation through the Administrative Procedure Act, which requires a Notice of Proposed Rulemaking and public comment period in federal agency rulemaking ("Administrative Procedure Act," 1946). The Federal Advisory Committee
Act governs public participation in the work of advisory committees ("Federal Advisory Committee Act," 1972). Likewise, NEPA prescribes methods of “public involvement” for agencies. NEPA regulations tell us that public notice for public hearings, meetings or availability of environmental documents must be provided, but it does not prescribe the methods that must be used. NEPA suggests providing such notice by publication in local newspapers, local media, newsletters, direct mail and posting physical notices on-site but does not preclude other methods. There is no mention of electronic means, such as posting information on a website or social media. NEPA regulations on public involvement also require that agencies “solicit appropriate information from the public” but is silent on the methods for such solicitation ("National Environmental Policy Act," 1979).

Legitimacy of citizen participation through social media is further undermined by the fact federal agencies may develop their own processes and implement NEPA differently. According to CEQ, “These [agency] procedures must meet the CEQ standard while reflecting each agency's unique mandate and mission” (Council on Environmental Quality, 2014). In one respect, the regulations on public involvement are broad and encompassing and could be considered a starting point for citizen participation with room for agencies to utilize social media to a great extent. In another respect, these regulations are too specific and limiting in their listing of some potential methods for public involvement and the exclusion of web communications and social media. CEQ regulations on public involvement are outdated, and agency flexibility in NEPA implementation results in insufficient public involvement programs that fail to make information available to public officials before making decisions and taking actions by not properly accounting for social media. Arnstein might say that these regulations result in token participation whereby agencies meet the letter of the law, but with a public involvement program
that does not utilize social media, misses the spirit of the law – genuine citizen participation and citizen power. Future research should address how to improve laws and regulations to maximize citizen participation through social media.

Congress has passed statues to address public involvement design in the context of unique agency missions. For example, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) requires Metropolitan Planning Organizations (MPOs) to develop public participation plans and requires that public meetings be “conducted at convenient and accessible locations at convenient times; employ visualization techniques to describe plans; and make public information available in an electronically accessible format, such as on the Web” (“Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users," 2005). This federal requirement applies only to MPOs, organizations which are responsible for the development of long range regional transportation plans, and to the exclusion of many other organizations involved in infrastructure planning.

There are agency-produced-or-sponsored documents in the U.S. Department of Transportation (USDOT) that more fully address public involvement methods and offer best practices. One such piece of guidance widely relied upon is “Public Involvement Techniques for Transportation Decision-Making,” published in 1996, and includes a section called “On-line services.” The content and guidance, including descriptions of the use of “modems,” is archaic when matched against modern web communications, it predates social media, and is weighted toward face to face meetings. A 2012 report by the Transit Cooperative Research Program (TCRP), sponsored by the Federal Transit Administration, is the most comprehensive guidance on the use of social media by transit agencies. But the report makes no mention of incorporating social media into the NEPA process. It focuses on social media as a customer service and
marketing/communications tool (Transit Cooperative Research Program, 2012). These agencies lack guidance about whether to include citizen comments from social media in the administrative project record. Citizens are told their comments on social media will not be considered “formal” in the outreach program and must submit them by other means, an example of social media as token participation on the ladder. Grantees of the USDOT desire that policy makers address this discrepancy (Transportation Research Board, 2013).

In 2015, the White House announced the availability of a Public Participation Playbook, a compilation of public participation best practices from across the federal government that managers could use to develop public participation programs (Zarek & Herman, 2015). Though heralded as an innovation, the Playbook has shortcomings. Because none of the practices are required, the Playbook amounts to a menu of suggestions which could be ignored by managers. It also focuses on social media as a tool for messaging, timely notice, and basic metrics of engagement rather than how to leverage citizen input on social media for superior government. The Playbook does nothing to clarify how federal agencies should treat comments from social media in statutory decision making processes. In developing model legislation for public participation, scholars have taken inspiration in others experience in which merely authorizing practices in law resulted in a “dramatic proliferation” of those practices in government (Leighninger, 2014).

Organizational Problems. Organizational rules, practices, and behaviors in public agencies further undermine social media as legitimate citizen participation. Although many public organizations have adopted social media, gaps remain. For example, an examination of public health contractors found that, though many modes of public participation are utilized in required programs, virtually no contractor used social media (Amirkhanyan, Joon Kim, &
Lambright, 2013). Researchers found that almost half of local governments within the EU did not have a presence on common social networks and their adoption lagged behind citizens (Bonsón et al., 2012). Adoption does not connote social media interactivity/engagement, let alone legitimacy. For example, Thackeray et al. (2012) found only 1.5% of tweets from state health departments were in response to a tweet from a follower. The majority of Facebook posts (86%) received no comments, and 45.1% of Facebook posts had no likes. On YouTube, 78.3% of videos received no likes and 70.7% received no comments. These findings are an indication of social media tokenism, in that agency communications with the public are one-way and have elicited no apparent interest from the citizens.

Social media legitimacy is elusive even for those public organizations that have a high degree of social media engagement with citizens. Government information officers in Mexico identified a litany of risks presented by public sector involvement in social media (Picazo-Vela, Gutiérrez-Martínez, & Luna-Reyes, 2012). The perception of risk affects how public agencies treat information from citizens on social media and can contribute to mistrust. For example, federal agencies, such as the Transportation Security Administration (TSA), have edited posts from members of the public on agency blogs which serves to undermine transparency and the legitimacy of such participation (Bertot et al., 2012). And more higher education institutions reported that “potential reputation damaging events were discussed in social media channels” than the number of those who reported similar threats on traditional media (Syme, 2012). Further exploration of the role that perceptions of risk plays in agency treatment of social media would be informative.

There is no literature on the effect of personal adoption (or lack of) of social media by senior leaders within an organization on agency treatment of citizen participation through this
medium. If senior leaders – those who make decisions on public projects and issues – are not aware of their organization’s engagement on social media or what citizens are saying about them on social media, could it ever be more than token participation? Organizations and the communicators within them have long recognized the power and influence of the press and have paid close attention to how their reputations are molded by it. For example, sharing daily newspaper clippings with senior leaders, especially if one’s organization is the subject of the article or mentioned, is a customary organizational practice. The distribution to senior leaders of a story in a local newspaper might generate a significant policy discussion amongst those leaders that could result in a policy analysis or policy change, or it might prompt an immediate agency reaction, such as writing an editorial response. Does a social media post have the same effect? If not, why? This is an area of future research.

Curtis et al. (2010) attempted to explain the decision to personally adopt social media through the development of a Unified Theory of Acceptance and Use of Technology (UTAUT) which measures the relationship between participant adoption and performance expectancy, effort expectancy, social influence, facilitating conditions, voluntariness of use, self-efficacy, and anxiety. A 2010 study used UTAUT to measure participants’ perception of information on social media as fair and accurate and found that communications practitioners in non-profits were more likely to use social media if they find it credible (Curtis et al.).

Critical Review

Arnstein’s ladder should be - but has not been - adapted to explain the range of treatment citizen participation on social media receives from government, from non-participation (at the lowest level), climbing to tokenism, up to citizen control (at the highest level). Non-participation might include public agencies that have not adopted social media in their communications.
Tokenism might include agencies that use social media for one-way communications, such as agency posts that receive no comments or Facebook ‘likes,’ or lack of interactivity with customers. Another example of tokenism might be an agency using social media to encourage the public to attend a public hearing to submit comments on a project rather than treating the comments received on social media themselves as legitimate. I believe applying this framework in a study of modern public participation through social media will likely reveal it is mostly token too.

As an emergent technology, the study of social media, especially for the public sector, lacks well-developed theory and models. There is even less theoretical development at the nexus of social media and public participation; the latter topic is explained through frameworks developed as early as the 1960s. Theories of public participation and theories of social media adoption/digital government application are currently studied as separate disciplines.

King’s (1998) distinction of conventional vs. authentic participation is applicable to social media, though the literature falls short in its explanation of how to reduce the distance between the citizen and the issue. Future study should explore whether social media as public participation is restricted by conventional structures/processes and administrators or serves to put citizens closer to the issues. This framework also does not account for the effect of dynamic two-way communications of citizens and administrators on issues. Nevertheless, social media, with its low barriers of entry, cost and speed, could help overcome barriers to authentic participation, such as transportation, time constraints, and personal/family economics.

Such theoretical inadequacies raise the question: is social media simply the latest popular mode of communication, or does it represent a paradigm shift in communications that warrants new labels and theory. For example, prior to the web, citizens participated in government
decision-making through submitting written comments in agency rulemaking, or through NEPA public hearings, or by calling telephone phone hotlines for service failures, none of which appeared to undermine contemporary public participation theory and demand adaption. Social media does, however, demand adaptation of theories. Its effects go far beyond the addition of a communications channel – social media is fundamentally changing the way people engage with one another. Using Arnstein’s ladder as a foundation presents the potential for the development of a useful framework adaptation – a ladder of social media as legitimate public participation. Such a framework could accommodate the distinct qualities of social media and provide a sound basis for evaluation of many issues concerning citizens and their relationship with government.
Chapter 2
A New Framework: Social Media Participation Range

Arnstein’s 8-rung participation ladder provides a strong foundation for analyzing public participation. The essence of the ladder is the notion of participation as an “empty ritual” versus participation bearing real benefits. This description remains useful today and accurately describes potential participatory experiences. Some public meetings in 2015 might be empty rituals where citizens are “spoken at” by officials or “informed.” Others might bear real benefit where citizens are able to influence a municipal budgeting process through participatory budget prioritization. The effort to define characteristics of these experiences by tier with illustrations is highly useful.

The drawback to Arnstein’s ladder is that it only validates the activity of the citizen, which skirts the legitimacy of those who derive power from statute or election in a democratic society. The ladder does not imagine a state of participation wherein public organizations or officials could possibly retain control and develop a climate conducive to citizens actively shaping government decisions or exacting better service delivery. Arnstein’s highest level is a state at which citizens have assumed power formerly held by the government. Though this could be interpreted as merely descriptive, Arnstein’s writings imply that citizen power is the goal. After all, Arnstein frames citizen power as the polar opposite to “citizen manipulation,” a clearly negative connotation.

Regardless, in 1969, twenty years before the world wide web was first launched and thirty five years before Facebook, it could not possibly have accounted for how such digital innovations would alter the way that people relate to each other and institutions. It could not possibly have accounted for the way in which these innovations would dramatically reduce the barriers for citizen input by almost fully eliminating the delay in which information could be
delivered to stakeholders and exchanged (Pew Research Center, 2014). Modern communications, particularly the two-way nature of social media, demands a new evaluative framework for analyzing public participation.

A Social Media Participation Range was developed to help researchers and practitioners think about and describe the types and qualities of public participation using social media. Unlike Arnstein, this framework does not assume citizen power as a necessary goal for good government. Responsive government that delivers projects, programs, and services to meet the needs of the citizenry is an alternative goal which does not require power sharing. Such a goal makes no attempt to wrestle control from government officials who derive their power legitimately from statute or election. Instead, it assumes that through citizen participation, better government decision making is possible, resulting in more effective and efficient government.

The Social Media Participation Range builds off of the tiered concept introduced by Arnstein. It retains the essence of the ladder – the notion of participation as an “empty ritual” versus participation bearing real benefits. This range describes the citizen experience of participation in government via social media. Like Arnstein, this exploration includes “characteristics and illustrations” of public organization behaviors and the state of the law as it relates to citizen participation via social media.

Instead of ladder rungs, the tiers are denoted by signal strength bars. With each bar, barriers are broken down and access to information improves, paving the way for superior government for citizens. The number of tiers of participation from Arnstein’s eight have been reduced down to four. Like Arnstein, the lowest tier represents the state of least participation, ascending to the greatest state of participation. Tracking similar to Arnstein’s broad categories of participation (from non-participation, to tokenism, and up to citizen power), the Social Media
Participation Range goes from a state of *social media non-adoption*, to *social media non-participation*, to *social media tokenism*, and up to *social media legitimacy*.

**Figure 2.1. Social Media Participation Range**

**SOCIAL MEDIA PARTICIPATION RANGE**

**Tier 1: Social Media Non-Adoption**

**Overview.** In the Social Media Participation Range, the lowest tier is not a bar at all; it is represented visually in the vector as a dot. It is the state of *non-adoption*. In this state, because of agency practices and the law, the citizen is shut out from participating in government decision
making via social media. In a state of non-adoption, there is an extreme disconnect between agency communications practices and the communications preferences of the public, who widely use social media and increasingly expect to conduct regular transactions with organizations through these platforms. Stakeholders instead are expected to conform to the participation preferences of the agency that display little concern for cost or time incurred by stakeholders.

Organizational Behaviors. The qualities of this state include non-adoption by organizations of social media technologies, whether mainstream or emerging. For some agencies, this could mean non-adoption of some of the most popular platforms, currently Facebook, Twitter, and LinkedIn. For others that have long-adopted these platforms, this state could describe non-adoption of Pinterest, Instagram, Vine, or Snapchat, currently less generally popular platforms, but highly popular amongst specific demographic groups. When an agency has failed to even adopt social media to communicate with citizens and stakeholders, it precludes the opportunity for participation through this media. It is not uncommon for these agencies to host a series of public meetings, which require in-person attendance and limited speaking opportunities, to satisfy participation requirements.

In a state of social media non-adoption, public officials are ignorant to the power of social media and the risk posed by alienation from its contents. This ignorance stems, in part, from senior leader’s personal information habits. Senior leaders have not personally adopted social media, and they receive their daily information from traditional news sources, such as reading the newspaper. The risk for these organizations is high, because, despite their non-adoption, stakeholders and customers are using social media in great numbers anyway. Their organizational reputation is being molded on social media without their knowledge.

To facilitate participation, agencies must adopt platforms that appeal to their key
demographics, even if on the fringe of mass adoption. For example, for an agency whose stakeholders include a high proportion of youth, the adoption of Snapchat, a platform very popular with youth (Lenhart, 2015), could prove more valuable than Facebook.

**Tier 2: Social Media Non-Participation**

**Overview.** The first bar (and second tier) in the range is *non-participation*. In this state, agency practices and the law present significant barriers to citizen participation via social media which brings no benefits to citizens or government decision making. For agencies, *non-participation* is when they have taken the step to adopt social media technologies, but mostly use them for one-way communications. In this state, social media is inconsequential. There is a complete disconnect between social media information and senior decision making. Many public organizations likely exist in this state but further work would need to be done to document this.

**Organizational Behaviors.** In this state, an agency might have created a Facebook page, but citizen participation with the agency through this page is lacking. Posting by the agency can be sparse. The agency treats social media as if they are a megaphone – used only to amplify a message they want to inform the public of, rather than inviting comment on, issues important to stakeholders. This is due to a general lack of understanding by those maintaining agency pages of the inherent social, sharable, and collaborative nature of the media. This lack of engagement attracts little public interest and feedback and often bears few social media subscribers (Facebook fans, Twitter followers, etc.) to agency pages.

The performance of the agency’s social media presence is rarely monitored and analyzed by staff. It is never reported internally. Senior leaders take almost no interest in social media in this state. They might even mistakenly view social media as faddish and extraneous to the core business and do not invest in personnel with social media skills.
**Policy Characteristics.** When it comes to the law, there exists a method bias against social media. In other words, the law explicitly requires a particular method of participation, such as public meetings, but makes no accommodation for social media. This results in organizations giving consideration to comments received in traditional forums, such as public meetings, and dismissing germane public comments that are submitted via social media. Agencies perceive no incentive to internalize public feedback from social media because no policy requires it.

**Tier 3: Social Media Tokenism**

**Overview.** The second bar in the range is *tokenism.* In this state, agency practices and the law amount to empty rituals for citizens participating via social media, which brings limited benefits to citizens and government decision making. A state of *tokenism* could be characterized by considerable two-way communications between an organization and its customers or stakeholders.

**Organizational Behaviors.** Organizations may have large numbers of subscribers to their social media pages. Posting is frequent and engaging and receives comments or other responses from the public, such as Facebook “likes.” Agency social media is active, but used often for token purposes (question of the day, entertainment, naming contests, and other trivial activities). A substantive use, such as feedback on the organization’s latest proposal or venture, is less frequent or non-existent.

Though these organizations might recognize the value of social media as a tool for engagement, these organizations have failed to harness social media for its most meaningful uses, such as citizen participation in government decision making. In fact, these organizations use social media to channel customers and stakeholders to other – “more formal” – channels of
participation. For example, an agency might post on social media a notice of a public hearing, at which citizen comments will be recorded for future consideration, or direct people to an online crowdsourcing platform, rather than requesting public comments directly through social media. Comments received on social media related to substantive public issues are not documented in public project records or processes.

In this state, organizations underestimate the power and risk of information from social media. Information generally receives a low level of care. Staff may monitor social media for information, but knowledge of it tends to remain there. Staff do not typically share information from social media with senior leaders, and senior leaders are not typically involved in any response to social media information. Even for organizations that have professional social media staff, the organizational structure reinforces medium bias by putting more emphasis on traditional “media relations” staff than on social media.

Though senior leaders may have personally adopted social media, they are not personally engaged with stakeholders on its platforms. This is an inhibitor to senior leaders truly understanding its power and opportunities presented by it. In fact, senior leaders might have a social media account that is “ghostwritten” by staff members so that there is the appearance of senior leader engagement when none actually exists. In this state, senior leaders still get most of their first-hand information from traditional media.

Despite high engagement, information from social media has little effect on agency decision making. Because it is not freely shared within an organization, information from social media does not cause significant discussion amongst senior leaders; after all, they cannot discuss what they are not aware of. In this state, social media rarely triggers organizational response, including to problems presented by customers and stakeholders. It also rarely triggers policy
review which could result in organizational change. This token approach to social media differs from organizational treatment of information from the news media, a source that senior leaders put more stock in.

**Policy Characteristics.** In a state of *social media tokenism*, the law allows for organizations to use social media for mandatory public participation, but does not require it. Because it is not required, staff are often confused about whether to include citizen feedback via social media in official government proceedings. To ensure compliance with the law, organizations ‘check the boxes’ that are required for public participation, and, without compulsory use, social media goes unchecked.

**Tier 4: Social Media Legitimacy**

**Overview.** The third bar (and highest tier), *legitimacy*, is characterized by highly meaningful social media interactions. In this state, agency practices and the law facilitate citizen participation via social media which brings significant benefit to citizens and government decision making.

**Organizational Behaviors.** These organizations are as concerned with the nurturing of citizenship through social media as they are with growing the number of subscribers and engagement metrics. In this respect, not only do organizations take great care to cultivate the potential impact of individual social media users on public policy, they are digital role models whose online behavior positively influences public participation beyond social media. The uses of social media are highly substantive, including explanations of complex policy topics and requests for input on pending agency actions. Social media even facilitates citizen co-production – the concept of citizens partnering with government to deliver public service or produce public goods – resulting in more effective government.
In a state of legitimacy, organizations possess an understanding of the opportunity and risk of social media. Organizations seek to maximize the benefit of social media for customers and stakeholders, including reducing traditional barriers to public participation, such as time, place and cost. Organizations value all participation methods and display no bias in their application. A citizen post on social media has equal weight to public comments made in more traditional forums, such as public meetings; the post is documented for the sake of the official proceeding or project record. Citizens are never restricted to provide their input by alternative method – their participation is validated in whichever medium they prefer. Citizens are only channeled from social media to other methods as an offer of additional participation opportunities. Agencies use this citizen input to improve decision making or service delivery.

This strong connection between social media and organizational decision making is made possible by regular information exchange between citizens and senior organizational leaders. In these organizations, information from social media is given a high level of care. Staff freely share information they encounter on social media with senior leaders in the organization. This information regularly triggers discussion at the highest levels. Further exploration of such issues may result in a review of policy or an organizational change. Senior leaders are involved with developing social media content and responses to significant posts.

Senior leaders in an organization have personally adopted social media and regularly engage with stakeholders on platforms. This contributes to first-hand knowledge of customer or citizen concerns and respect for social media’s power, and the opportunity it presents. Senior leaders’ daily information scanning regimen includes a balance of sources, including social media. Organizations take a balanced approach to allocating resources for social media and traditional media. For example, staff responsibility for traditional news media does not outrank
social media.

In a state of *social media legitimacy*, the risk for organizations presented by social media is also high, but substantially mitigated. This is due to the close attention paid to social media and the high level of care critical information receives when encountered. Officials are not caught off guard by information on these platforms because they are instantly aware of what is said about them and its context. Problems articulated by customers and stakeholders are identified quickly. This information undergoes a proper situational analysis which may involve a review of organizational policies or practices. Action is taken, and a response – developed in conjunction with senior leaders – is delivered to the public.

**Policy Characteristics.** The law puts social media on equal footing with other more traditional methods of public participation. In this case, the law requires the use of social media whenever specific public participation methods are prescribed. In the eyes of the law and those responsible for implementation, a comment made by a citizen on social media is equal to a comment made in person at a public meeting. To achieve this, outdated statutes and regulations are amended to keep pace with modern communications realities.

**Conclusion**

The Social Media Participation Range is an evaluative framework for analyzing public participation in light of changes to society brought about by digital innovations, including social media. The limitations of this framework include the potential over-simplification in describing a wide range of participatory experiences in too neat tiers. Also, some characteristics attributable to one tier might also be true of another tier. Because all typologies suffer from these limitations, such limitations should not be construed to undermine the participation range’s usefulness to researchers and practitioners. This framework gives researchers and practitioners common
language and descriptions of the qualities of public participation using social media, an emerging field. Furthermore, the Social Media Participation Range extends beyond the case-by-case evaluation benefits of predecessor frameworks that fail to describe the overall relationship between citizens and government. The Social Media Participation Range can be applied to a particular decision or policy area, but is best used as an overall yardstick for the relationship between the agency and the public.
Chapter 3
Methods

I am concerned with the legitimacy of citizen participation via social media. I am specifically concerned that participation via social media is, at best, token and that more traditional methods of participation are given more legitimacy. My research question is: how does public agency behavior currently treat citizen participation on social media, and what recommendations can be made to maximize the opportunity for such participation?

With this knowledge, communications practitioners and other public policy makers will have the information to make improvements to public policy and practice that currently inhibit the use of social media as a legitimate form of citizen participation. Public agencies can use this information to better meet public expectations and transform their internal operational models to incorporate social media in participation processes. To legitimize citizen participation without regard for historic biases toward particular communications methods, recommendations could address organizational structure, models for internal information sharing, documentation of public comments via social media, and the personal adoption of technology and stakeholder engagement by senior leadership. Lawmakers can use this information to clarify public participation regulations and balance traditional and new media methods.

In order to understand how social media is treated within organizations and its legitimacy, I compared its treatment to the treatment of information from traditional media sources. This is important because organizations and the communicators within them have long recognized the power and influence of the press and have paid close attention to how their reputations are molded by it. For example, sharing daily newspaper clippings with senior leaders, especially if one’s organization is the subject of the article or mentioned, is a customary organizational practice. The distribution to senior leaders of a story in a local newspaper might
generate a significant policy discussion amongst those leaders that could result in a policy analysis or policy change, or it might prompt an immediate agency reaction, such as writing an editorial response. Does a social media post have the same effect? If not, I wanted to find out why. I also wanted to find out if public comments made via social media are given the same weight as comments made in person at public meetings. If not, I wanted to find out why? To understand potential influences on disparate treatment I also wanted to understand the role of senior leaders in the organization as it relates to social media and organizational beliefs about social media.

The research method I used was surveying. I elected to conduct surveys because the data I sought could not be collected easily by other means. This data could not be collected by viewing readily available public information such as web pages and social media posts because it concerns the inner workings of organizations and how actors behave. Gaining access to the inside of an organization, through ethnography or records requests, and scrutinizing how it handles information would also be far more difficult. Though records requests under Freedom of Information laws might be an effective way to analyze how information is treated internally, honing in on specific communications related to these practices would be searching for the proverbial “needle in the haystack.” Secondary data analysis was also not viable for my study because I have not found any data sets concerning how public organizations are affected by their social media adoption.

Surveys allowed me to effectively answer my questions concerning organizational treatment and legitimacy of social media by asking those who represent, and have first-hand working knowledge of, the organizations I sought to understand. I targeted senior communications practitioners in public sector organizations from a wide array of industries to
complete my survey. These subjects are the most well-positioned insiders with direct working knowledge or easy access to the information I sought. A number of national organizations provided assistance in the distribution of my survey: the National Association of Government Communicators (NAGC), City-County Communications & Marketing Association (3CMA), the American Public Transportation Association (APTA), and the Council for Advancement and Support of Education (CASE).

These four organizations are comprised of members who match my target population. NAGC describes itself as “a national not-for-profit professional network of federal, state and local government employees who disseminate information within and outside government.” “Effective public communicators are vital to local government success, linking citizens to the essential information they need to access services and be part of the democratic process,” says the 3CMA website. Their members consists of “700 professional public communicators and marketers from all over the nation” from the ranks of local government. APTA, the preeminent industry for public transportation agencies in North America, has a Marketing & Communications Committee which includes a Social Media Task Force. CASE describes itself as “a professional association serving educational institutions and the advancement professionals who work on their behalf in alumni relations, communications, development, marketing and allied areas.” In addition, I posted my recruitment message, survey link, and consent form on CASE Communities, a secure online message board for CASE members who are communications professionals. I also made personal requests to twenty-one senior communicators in public agencies from my own professional network using my recruitment email, survey link, and consent form. My recruitment/sampling strategy was conducted without consideration of subject age, gender, race, or other demographic characteristics.
APTA provided me a list of their marketing & communications membership, which contained 335 individuals. I sent these individuals my recruitment email containing the survey link and consent form. The other three organizations sent my recruitment email with a link to my survey and consent form directly to their membership. It is not clear how many members were emailed, but the distributions which generated the greatest response were CASE, 3CMA, NAGC, and APTA, in that order.

I targeted predominantly senior communications professionals. These professionals – more so than lower level professionals or specialists of a specific media type – have an expert perspective on the questions I wished to answer. Senior level communicators have an ideal vantage point. They are close to senior leaders and able to see the bigger organizational picture and contextual landscape. At this level, they can also speak to how their organization treats social media versus other methods of communication and why. Lower level communicators, may not fully see the affect that media has on their organizations because they are not close enough to key decision makers. Similarly, social media specialists or other media specific position may have an unbalanced view of media treatment in general because they work day to day on only one type of media. For example, social media specialists might believe social media is treated with more or less care than traditional media because the specialists are not familiar with the care provided to traditional media.

I attempted to limit distribution of the survey to only these senior communicators. For example, CASE only sent the recruitment email to members with the title of “director” and higher. Furthermore, both the recruitment email and consent form explicitly stated that the survey was for intended for “senior communications practitioners.” Although the population I reached were predominantly senior communicators in charge of general communications, the
survey did attract other communicators. Their input is not without value and, therefore, remained in the final sample I analyzed.

A 46-question electronic survey (41 required, 5 optional) was created in SurveyMonkey and distributed to participants (the full list of questions can be found in Appendix E). The first question of the survey was reserved for the consent form which required acceptance before moving to the next question. The five optional questions allowed respondents to request follow up communications from the researcher regarding social media research. The forty remaining survey questions measured demographic information, organizational treatment of social media and traditional media, and the role of senior leaders and beliefs in organizational behavior toward social media. Specifically, I measured demographic information of a professional nature, not personal demographic information. I asked about respondents’ organization type (i.e. which level of government), job title, and major job responsibilities relative to my question of organizational behavior and treatment of social media.

I measured the organizational treatment of information from social media and traditional media. I asked respondents about the frequency, immediacy, and categories of information shared from social media and traditional media. I asked respondents how often information from social media and traditional media triggered senior leader discussion. I asked how often this information triggered an organizational response or change, and specially measured negative information as stimuli. I asked respondents about the differences in senior leader involvement in the preparation of social media and traditional media content, such as press releases and newspaper editorials. I also measured the level of concern senior leaders held for their reputations in social media and traditional media.

I measured the treatment of citizen comments made via social media and traditional
media. I asked whether respondents held public meetings. I measured the weight a comment made via social media is given in relation to a comment made in a public meeting. I asked respondents whether they use social media to channel citizens to “more formal” methods of participation. I measured the reasons why comments made via social media were given less weight.

I measured senior leaders’ role in organizational behavior toward social media. I asked about senior leaders’ communications habits. For example, I asked whether senior leaders used social media and engaged agency with stakeholders through it, and through which media they get most of their first-hand information. I asked respondents how important senior leaders view agency social media, and whether they believe there is connection between this view and their social media use. I also measured whether senior leaders were in touch with younger stakeholders.

I measured organizational beliefs about social media. I asked whether respondents believed traditional news had greater reach than social media, whether social media or traditional media made a more lasting impression, and on which media negative information was more damaging. I measured whether respondents believed information about their organization was likely to go viral on social media.

All of the data was exported from SurveyMonkey into a spreadsheet. Through a data cleaning process, the data was reordered for convenient analysis and grouped into topical sections. All null fields were replaced with a numeral “989898” that would be controlled for later in statistical analysis. I had partial or incomplete data for 425 distinct respondents. To handle the partial responses, I established a cutoff and then disposed of 74 partial responses that did not meet the threshold. The threshold I established was whether respondents had answered at least
the first eight questions of the survey. The eighth question – whether public comments via social media were treated with more, less or the same weight as comments made at public meetings – was a key question to my overall research.

There were three questions that included an answer option of “Other” and allowed respondents to insert a text explanation. The intent of this option was to allow for other possibilities beyond the provided answers and avoid “cornering” respondents into an answer that did not satisfy their views. Only two of these three questions generated responses in the “Other” category. These two questions asked which types of information are shared with senior leaders. A quirk discovered in the survey instrument was that it restricted respondents from only selecting “Other;” respondents who selected “Other” were also required to select another answer. There were four designed answers for the question of types of information shared with senior leaders: all, only positive, only negative, and only if deemed high risk. This situation required close analysis and re-coding. First, I analyzed whether the inserted text was substantively different than the designed answer options. If yes, I removed the designed answer selection and re-coded it as a new answer. Due to the distinctiveness of the answers provided for “Other,” five additional answers were established for types of information shared with senior leaders: relevant, consequential, a combination, other, and ‘of interest.’

There were two questions related to respondents experience with social media as part of the NEPA process. Only 21 respondents answered these questions. This data was not analyzed due to its low volume and concerns for lack of statistical power and generalizability. The remaining data was analyzed using IBM SPSS Statistics Version 22 software.

In addition to the survey, I conducted a set of interviews for a deeper understanding of agency conditions and obstacles to social media legitimacy and to ask questions why. The pool
of interviewees was developed by using one of my five optional survey questions to allow respondents to opt-in to a phone interview. Although the interviews were conducted, the data collected from the interviews was not systematically analyzed for the purposes of the thesis. Instead, data from the interviews was used to illustrate findings in the survey.

The interviews were conducted over the phone and lasted approximately one hour. A semi-structured questionnaire was used to guide the interview (the full interview guide can be found in Appendix D). Afterwards, a professional transcriptionist was hired to transcribe the interview verbatim. The following list describes the seven high ranking public sector communicator interviewees:

- Two directors of communications for mid-sized cities
- One communications director of a state department of transportation
- One communications manager at a large suburban public transit agency
- One associate vice president for communications at a mid-sized public university
- One director of marketing & public affairs at a large urban public transit agency
- One director of marketing & public relations at a mid-sized public community college

**Limitations**

Though I collected data from an array of public organizations, higher education and local government represented over half of total respondents. Although unlikely, due to the strong patterns found in the results, it is possible that higher education and local government exhibit behavior toward social media that is different from other public industries. Future studies on this topic should cast an even wider net and balance industry representation in the sample.

The data was collected in 2015. Social media is a highly dynamic topic of study due to
the dramatic recent improvements in mobile technologies, pervasive access to mobile devices for Americans, and cultural shifts resulting from mobile ubiquity. New social media platforms crop up each year, all with hype of general popularity and lesser with staying power. What was widely understood about preferred communications methods from just a few years ago are now false. For example, younger social media users dominated Facebook early on but have quickly abandoned the platform for Instagram and Snapchat. Regular studies should be conducted to determine whether agency treatment of citizen participation via social media also changes quickly and over time, as well as in what ways. It is possible, for example, that as senior leaders age out of their positions, new senior leaders bring greater personal acceptance of social media which increases the legitimacy of agency practices toward social media.

Due to the low response to questions specifically about NEPA public involvement, this study is limited in its ability to explain how agencies treat citizen participation via social media in NEPA processes. Study findings about public meetings and hearings – the backbone of traditional NEPA public involvement – provide insight on how NEPA subject agencies likely treat social media; however, future studies should specifically analyze social media as a NEPA method of public involvement.

Ethics

Approval for the study was required and granted by the Northeastern University Institutional Research Board (IRB). Consistent with my IRB approval, each study participant was required to give consent before participating. I used one version of the consent form for survey participants and another version for interview participants. Both versions of the form described the goal of the data collection method, why the population had been selected, and the risks to participants. The forms provided contact information for the researchers and other proper
disclaimers. The form for the survey participants included an estimated time of completion. All survey participants were required to mark “I consent” to the form before moving on to the first survey question. For the interview participants, I sent consent forms along with confirmation of participation emails. I reviewed relevant elements of consent over the phone with participants as part of the interview.

The study did not provide direct benefits to participants. It will, however, provide indirect benefits to participants as industry learns from the study about the treatment of citizen participation via social media and how to improve it. The possible risks or discomforts to participants of the study were minimal. There were no vulnerable populations targeted in this project. Participants could have felt a little uncomfortable answering survey questions if they disclosed participation practices that are contrary to the intent of public participation processes. To address this, survey respondents were anonymous. The identities of interview participants and personal identifying information was kept confidential and will not be published.

I stored survey data in SurveyMonkey software and also in a Microsoft Excel spreadsheet in my GoogleDrive. I stored data from telephone interviews on FreeConferenceCall.com software and on audio files in my GoogleDrive. The audio files of the interviews, along with the consent forms and confirmation of participation emails, will be retained for three years following the end of the study, after which they will be destroyed. Each of these storage locations is password-protected, and I am the only one with knowledge of the password and access to the storage. The only other person who temporarily had access to the interview data is the professional transcriptionist.
Chapter 4

Results

Respondents

This survey was primarily targeted at senior communications practitioners in public organizations. The population surveyed included a cross section of public organizations, including but not limited to local, state, and federal agencies, institutions of higher education, law enforcement, and public utilities. Some private institutions from higher education and K-12 education were included in the survey. These respondents were retained in the study because, despite their private status, they are subject to federal regulations. For example, any college with a student who receives federal financial aid is subject to oversight from the U.S. Department of Education. Likewise, universities that receive federal grant monies are subject to the regulations of that funding agency. Of the 349 total survey respondents, 315 provided their industry type. The largest percentage of respondents were: 33% from local government, 24.4% from public higher education, 13.7% from private higher education, 10.2% from public transportation, and 6% from federal agencies. Table 4.1 below provides a full list of respondent organization types by percent and count.
### Table 4.1. Description of Respondent Organizations

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<th>Respondent Organization Types</th>
<th>Count</th>
<th>%</th>
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<td>33</td>
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<tr>
<td>Public higher education</td>
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<td>Public transportation</td>
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<td>6</td>
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<td>Private K-12 education</td>
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<td>State agencies</td>
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<tr>
<td>Other (law enforcement, non-profit, etc.)</td>
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<td><strong>Total</strong></td>
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</tbody>
</table>

Of the 273 respondents who provided their professional title, 23.1% were directors of communications, 15.8% were communications managers/coordinators, and 12.5% were public information/affairs officers. In many cases, these positions are the top-ranked communications personnel within an agency and some of these position names are interchangeable within the communications field. For example, the duties of a Director of Communications in one organization may mirror those of a Public Information Officer at another agency. Among the respondents, 60.9% carried senior communicator job titles including coordinator, manager, director, chief, associate vice president, and vice president. Therefore, the survey predominantly reached the intended audience. Table 4.2 below provides a full list of respondent job titles by percent and count.
Table 4.2. Description of Respondent Job Titles

<table>
<thead>
<tr>
<th>Respondent Job Titles</th>
<th>Count</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director of Communications</td>
<td>63</td>
<td>23.1</td>
</tr>
<tr>
<td>Communications Manager/Coordinator</td>
<td>43</td>
<td>15.8</td>
</tr>
<tr>
<td>Public Information/Affairs Officer</td>
<td>34</td>
<td>12.5</td>
</tr>
<tr>
<td>Communications Specialist</td>
<td>29</td>
<td>10.6</td>
</tr>
<tr>
<td>Chief Communications Officer/VP</td>
<td>26</td>
<td>9.5</td>
</tr>
<tr>
<td>Digital-only position</td>
<td>23</td>
<td>8.4</td>
</tr>
<tr>
<td>Marketing position</td>
<td>21</td>
<td>7.7</td>
</tr>
<tr>
<td>Other</td>
<td>20</td>
<td>7.3</td>
</tr>
<tr>
<td>Community relations position</td>
<td>14</td>
<td>5.1</td>
</tr>
<tr>
<td>Total</td>
<td>273</td>
<td>100</td>
</tr>
</tbody>
</table>

The population surveyed – senior communications practitioners – are in the best position to answer the question of how public agencies treat citizen participation on social media. The director of communications at a state department of transportation described their role this way, “I don’t get into every single media issue, but I receive the ones that impacts the governor, the secretary, the commissioner in our executive leadership. The real hot button issues, the real controversial issues are the ones I get involved with. So I keep an oversight and keep tabs of what’s being said and done and that kind of thing. And I have a general oversight of it.” A communications director for a mid-sized city said, “I’m directly under the assistant city manager, but for all practical purposes, I really report to the city manager. Any time there’s an issue, I’m called in and we discuss our best strategy, the key messages, whatever strategy we need to do to address whatever issue comes up.” The vast majority of respondents (90.3%) were familiar with
agency public outreach and processes, which makes them authoritative on the issue of public comments via public meetings and hearings. These respondents know what takes place at agency-held public meetings, including the exchange of information between agencies and citizens/stakeholders, and their impact.

These senior communications practitioners play the role of an internal informant, clueing in higher ups into what is being said about the organization (75.1%). There is a gate-keeping quality to their work, as they regularly scan information sources and make decisions about what information is and is not important to share with others within the organization and what to let lie. One interviewee described it this way: “I’m sort of the first filter [public information] goes through, ascertaining the degree and nature of the message, evaluating where that message has originated, the potential scope and broadcast of that media through which the messages came, and really begin to filter it to the proper department offices or personnel on campus.” The act of sharing or not sharing a piece of information has serious consequences and is the precursor to other potential actions by the organization, all of which are triggered as a result of sharing. Survey respondents maintain this responsibility of scanning, assessing, and sharing (SAS) for traditional news sources (83.4%) as well as social media (82.8%). The consequential responsibilities of respondents toward this information extend beyond SAS. Those surveyed report that they seek facts internally to confirm external reports (76.8%); they prepare and distribute reports on social media activity (57%); and they plan responses to information through press releases (69.3%) and editorials (45%). These duties make the respondents authoritative on how public agencies treat citizen participation on social media and able to compare it to treatment of information from traditional media. Table 4.3 below provides a list of respondent job characteristics by percent and count.
**Table 4.3. Description of Respondent Characteristics**

<table>
<thead>
<tr>
<th>Most common respondent characteristics</th>
<th>Count</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Familiar with public outreach &amp; process</td>
<td>315</td>
<td>90.3</td>
</tr>
<tr>
<td>Determine relevant news and share internally</td>
<td>291</td>
<td>83.4</td>
</tr>
<tr>
<td>Monitor social media &amp; share internally</td>
<td>289</td>
<td>82.8</td>
</tr>
<tr>
<td>Seek facts internally about news story</td>
<td>268</td>
<td>76.8</td>
</tr>
<tr>
<td>Make people aware of what is said</td>
<td>262</td>
<td>75.1</td>
</tr>
<tr>
<td>Draft press releases</td>
<td>242</td>
<td>69.3</td>
</tr>
<tr>
<td>Deliver response to the media</td>
<td>237</td>
<td>67.9</td>
</tr>
<tr>
<td>Prepare &amp; distribute reports on social media analytics</td>
<td>199</td>
<td>57</td>
</tr>
<tr>
<td>Set tone for what others think</td>
<td>159</td>
<td>45.6</td>
</tr>
<tr>
<td>Draft editorials</td>
<td>157</td>
<td>45</td>
</tr>
</tbody>
</table>

**Comparing Treatment of Social Media and Traditional Media**

I performed paired t-tests and Pearson chi-square tests on paired questions to determine whether organizations behave differently when it comes to information encountered on social media and through more traditional methods. Results show that information from social media is treated with less care, affects organizational decision making to a lesser extent, and is of less concern to senior leaders than information from traditional news sources. I used an option in SurveyMonkey that assigns an ordinal scaled numerical code to answers upon export. The numerical codes ranged from a 1 to a 5, depending on the number of answers in each question. The answer reflecting the highest state of legitimacy was always assigned a 1; the lower the number assigned, the lower the state of legitimacy. Table 4.4 below provides a sample codebook for the variables directly compared to aid reader understanding and interpretation.
Table 4.4. Code Book for Paired T-Test Variables

<table>
<thead>
<tr>
<th>Variable</th>
<th>Survey Answer</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share Frequency</td>
<td>Always</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Frequently</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Rarely</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Never</td>
<td>4</td>
</tr>
<tr>
<td>Share Immediacy</td>
<td>When it happens</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Daily</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Weekly</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Monthly</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Never</td>
<td>5</td>
</tr>
<tr>
<td>Senior Leader Discussion</td>
<td>Always</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Frequently</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Rarely</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Never</td>
<td>4</td>
</tr>
<tr>
<td>Organizational Response/Change</td>
<td>Always</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Frequently</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Rarely</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Never</td>
<td>4</td>
</tr>
<tr>
<td>Negative Information –</td>
<td>Always</td>
<td>1</td>
</tr>
<tr>
<td>Organizational Response/Change</td>
<td>Frequently</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Rarely</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Never</td>
<td>4</td>
</tr>
<tr>
<td>Senior Leader Involvement</td>
<td>President/</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>senior leaders</td>
<td></td>
</tr>
<tr>
<td></td>
<td>No senior leaders</td>
<td>2</td>
</tr>
<tr>
<td>Senior Leader Concern</td>
<td>Very</td>
<td>1</td>
</tr>
<tr>
<td></td>
<td>Somewhat</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>Hardly</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>Not</td>
<td>4</td>
</tr>
</tbody>
</table>

**Internal Sharing of Information.** The act of sharing information within an organization is an important indicator of social media legitimacy, as information cannot be acted upon unless it is known by decision makers. Information from social media was shared less freely in organizations than information from news media (See Table 4.5). There was a statistically significant difference in the frequency with which respondents shared information from social media with senior leaders compared to the frequency of sharing information from traditional
media sources ($p=.0001$). Information from social media was shared less frequently (mean=2.21) than information from news media (mean=1.57).

There was a statistically significant difference in the *immediacy* with which respondents shared information from social media with senior leaders compared to the immediacy of sharing information from news media sources ($p=.0001$). Information from social media was shared less immediately (mean=2.28) than information from news media (mean=1.78).

**Table 4.5. Internal Sharing of Information**

<table>
<thead>
<tr>
<th>Measure</th>
<th>Media Type</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share Frequency</td>
<td>Traditional</td>
<td>344</td>
<td>Always</td>
<td>157</td>
<td>45</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>168</td>
<td>48.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>16</td>
<td>4.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>3</td>
<td>0.9</td>
</tr>
<tr>
<td></td>
<td>Social</td>
<td>322</td>
<td>Always</td>
<td>47</td>
<td>13.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>165</td>
<td>47.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>105</td>
<td>30.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>5</td>
<td>1.4</td>
</tr>
<tr>
<td>Share Immediacy</td>
<td>Traditional</td>
<td>328</td>
<td>When it happens</td>
<td>179</td>
<td>54.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Daily</td>
<td>86</td>
<td>26.2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Weekly</td>
<td>38</td>
<td>11.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Monthly</td>
<td>16</td>
<td>4.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>9</td>
<td>2.6</td>
</tr>
<tr>
<td></td>
<td>Social</td>
<td>309</td>
<td>When it happens</td>
<td>179</td>
<td>57.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Daily</td>
<td>20</td>
<td>6.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Weekly</td>
<td>25</td>
<td>8.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Monthly</td>
<td>15</td>
<td>4.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>70</td>
<td>22.7</td>
</tr>
</tbody>
</table>

There was a statistically significant difference in the categories of information respondents shared with senior leaders ($p=.0001$). Most respondents reported they shared *all* news media they encountered with senior leaders (68.5%), but they exerted much more discretion when it came to social media. Only 16.9% of respondents shared *all* social media information with senior leaders, while 56.8% reported they only shared social media they deemed *high risk*. This information risk assessment was much less prevalent with traditional
news media, as 18.5% of respondents only shared information from traditional media sources with senior leaders if it was deemed *high risk*. In other words, information from traditional media was generally assumed to carry risk and thus shared more freely. In contrast, social media was generally assumed to be innocuous and thus only shared when the exceptional high risk post was encountered. Table 4.6 below provides a code book for the Pearson chi-square test of share categories and their frequencies.

### Table 4.6. Code Book and Descriptives for Share Categories

<table>
<thead>
<tr>
<th>Media Type</th>
<th>n</th>
<th>Survey Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Traditional</td>
<td>324</td>
<td>All news</td>
<td>222</td>
<td>68.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only positive news</td>
<td>2</td>
<td>0.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only negative news</td>
<td>3</td>
<td>0.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only high risk news</td>
<td>60</td>
<td>18.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only relevant news</td>
<td>8</td>
<td>2.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only consequential news</td>
<td>16</td>
<td>4.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>A combination of news</td>
<td>1</td>
<td>0.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Other</td>
<td>6</td>
<td>1.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>News of interest</td>
<td>6</td>
<td>1.9</td>
</tr>
<tr>
<td>Social</td>
<td>301</td>
<td>All posts</td>
<td>51</td>
<td>16.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only positive posts</td>
<td>7</td>
<td>2.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only negative posts</td>
<td>12</td>
<td>4.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only high risk posts</td>
<td>171</td>
<td>56.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only relevant posts</td>
<td>13</td>
<td>4.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Only consequential posts</td>
<td>15</td>
<td>5.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>A combination of posts</td>
<td>14</td>
<td>4.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Other</td>
<td>13</td>
<td>4.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Posts of interest</td>
<td>5</td>
<td>1.7</td>
</tr>
</tbody>
</table>

**Organizational Stimuli and Response/Change.** The impact on decision making is another indicator of social media legitimacy. Once decision makers are aware of information, discussion about the information may ensue. That discussion may lead to an organizational response to the information or a change in policy or practice. There was a statistically significant difference in the amount of internal discussion amongst senior leaders resulting from information on social media compared to internal discussion from information on traditional media.
Information from social media resulted in less discussion amongst senior leaders (mean=2.79) than information from news media (mean=2.28).

There was also a statistically significant difference in the organizational response or change resulting from information on social media compared to the response or change resulting from information on traditional media ($p=.0001$). Information from social media resulted in less organizational response or change (mean=2.79) than information from news media (mean=2.71).

The organizational response or change specifically to negative information on social media was also tested. I found there was a statistically significant difference in the organizational response or change resulting from negative information on social media when compared to the response or change resulting from negative information on traditional media ($p=.0001$). Negative information from social media resulted in less organizational response or change (mean=2.55) than negative information from news media (mean=2.32). Table 4.7 below shows the responses related to organizational stimuli and organizational response/change.
Table 4.7. Organizational Stimuli and Response/Change

<table>
<thead>
<tr>
<th>Measure</th>
<th>Media Type</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior Leader Discussion</td>
<td>Traditional</td>
<td>328</td>
<td>Always</td>
<td>17</td>
<td>5.2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>202</td>
<td>61.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>108</td>
<td>32.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>1</td>
<td>0.3</td>
</tr>
<tr>
<td>Social</td>
<td>309</td>
<td></td>
<td>Always</td>
<td>3</td>
<td>1.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>74</td>
<td>23.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>216</td>
<td>69.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>16</td>
<td>5.2</td>
</tr>
<tr>
<td>Organizational Response/Change</td>
<td>Traditional</td>
<td>328</td>
<td>Always</td>
<td>3</td>
<td>0.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>96</td>
<td>29.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>220</td>
<td>67.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>9</td>
<td>2.7</td>
</tr>
<tr>
<td>Social</td>
<td>309</td>
<td></td>
<td>Always</td>
<td>7</td>
<td>2.3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>66</td>
<td>21.4</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>222</td>
<td>71.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>14</td>
<td>4.5</td>
</tr>
<tr>
<td>Negative Information – Organizational Response/Change</td>
<td>Traditional</td>
<td>315</td>
<td>Always</td>
<td>22</td>
<td>7.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>164</td>
<td>52.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>128</td>
<td>40.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>1</td>
<td>0.3</td>
</tr>
<tr>
<td>Social</td>
<td>293</td>
<td></td>
<td>Always</td>
<td>22</td>
<td>7.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Frequently</td>
<td>93</td>
<td>31.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Rarely</td>
<td>170</td>
<td>58</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Never</td>
<td>8</td>
<td>2.7</td>
</tr>
</tbody>
</table>

**Involvement of Ranking Officials.** The organizational hierarchy of responsibility for social media is an indicator of legitimacy. In many organizations, staff who routinely interact with news reporters rank higher in the organization than staff who routinely interact with stakeholders on social media. More than fifty percent of respondents reported that dedicated news staff outrank their social media counterparts. Furthermore, the care and attention given by senior decision makers to information on social media indicates the medium’s legitimacy (See Table 4.7).

Senior leaders are less involved in drafting and posting social media than traditional methods of public communication, such as sending press releases, submitting letters to the
newspaper editor or op-eds. There was a statistically significant difference in the involvement of senior leaders in preparation of social media compared to involvement in the preparation of press releases \((p=.0001)\). Senior leaders are less involved with the development of responses to information in social media (mean=1.65) than the development of an outbound press release (mean=1.45). There was a statistically significant difference in the involvement of senior leaders in preparation of social media compared to involvement in the preparation of editorial responses to news items \((p=.0001)\). Senior leaders are less involved with the development of responses to information in social media (mean=1.64) than the development of an editorial response to a news item (mean=1.05). Table 4.8 below shows the responses related to the involvement of ranking officials in organizational social media.

<table>
<thead>
<tr>
<th>Measure</th>
<th>Media Type</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Traditional news staff rank higher?</td>
<td>Traditional (press release)</td>
<td>349</td>
<td>Yes</td>
<td>201</td>
<td>57.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>148</td>
<td>42.2</td>
</tr>
<tr>
<td>Involvement in preparation</td>
<td>Traditional (press release)</td>
<td>324</td>
<td>President/senior leaders</td>
<td>182</td>
<td>56.2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>No senior leaders</td>
<td>142</td>
<td>43.8</td>
</tr>
<tr>
<td></td>
<td>Traditional (editorial)</td>
<td>315</td>
<td>President/senior leaders</td>
<td>300</td>
<td>95.2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>No senior leaders</td>
<td>15</td>
<td>4.8</td>
</tr>
<tr>
<td>Social</td>
<td></td>
<td>293</td>
<td>President/senior leaders</td>
<td>103</td>
<td>35.2</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>No senior leaders</td>
<td>190</td>
<td>64.8</td>
</tr>
</tbody>
</table>

**Senior Leader Concern.** There was a statistically significant difference in the concern senior decision makers have over their organizational reputation in social media compared to their concern for their organizational reputation in traditional media \((p=.0001)\). According to survey respondents, senior leaders are less concerned about their portrayal in social media (mean=2.20) than their portrayal in traditional news media (mean=1.59). Table 4.9 below shows the frequencies for senior leader concerns.
Table 4.9. Senior Leader Concern

<table>
<thead>
<tr>
<th>Media Type</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Traditional</td>
<td>293</td>
<td>Very</td>
<td>151</td>
<td>51.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Somewhat</td>
<td>116</td>
<td>39.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Hardly</td>
<td>22</td>
<td>7.5</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not</td>
<td>4</td>
<td>1.4</td>
</tr>
<tr>
<td>Social</td>
<td>293</td>
<td>Very</td>
<td>54</td>
<td>18.4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Somewhat</td>
<td>141</td>
<td>48.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Hardly</td>
<td>82</td>
<td>28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not</td>
<td>16</td>
<td>5.5</td>
</tr>
</tbody>
</table>

Table 4.10 below provides a list of variances for the paired t-tests conducted. Bold lettering indicates the media type treated with greater legitimacy.

Table 4.10. Analysis of Variance

<table>
<thead>
<tr>
<th>Factor</th>
<th>n</th>
<th>Media Type</th>
<th>Mean</th>
</tr>
</thead>
<tbody>
<tr>
<td>Share Frequency***</td>
<td>322</td>
<td>Traditional</td>
<td>1.57</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>2.21</td>
</tr>
<tr>
<td>Share Immediacy***</td>
<td>309</td>
<td>Traditional</td>
<td>1.78</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>2.28</td>
</tr>
<tr>
<td>Senior Leader Discussion***</td>
<td>309</td>
<td>Traditional</td>
<td>2.28</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>2.79</td>
</tr>
<tr>
<td>Organizational Response/Change***</td>
<td>309</td>
<td>Traditional</td>
<td>2.71</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>2.79</td>
</tr>
<tr>
<td>Negative Information –</td>
<td>288</td>
<td>Traditional</td>
<td>2.32</td>
</tr>
<tr>
<td>Organizational Response/Change***</td>
<td></td>
<td>Social</td>
<td>2.55</td>
</tr>
<tr>
<td>Senior Leader Involvement***</td>
<td>293</td>
<td>Traditional (press</td>
<td>1.45</td>
</tr>
<tr>
<td></td>
<td></td>
<td>release)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>1.65</td>
</tr>
<tr>
<td>Senior Leader Involvement***</td>
<td>288</td>
<td>Traditional (editorial)</td>
<td>1.05</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>1.64</td>
</tr>
<tr>
<td>Senior Leader Concern***</td>
<td>293</td>
<td>Traditional</td>
<td>1.59</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>2.20</td>
</tr>
</tbody>
</table>

*p<.05, **p<.01, ***p<.001  
Bold lettering indicates the media type treated with greater legitimacy.

Comparing Treatment of Comments via Social Media and Public Meetings

Among the respondents, 65% held public meetings or hearings. Of those who held public meetings or hearings, 47.1% reported comments from social media are given less weight than
comments at public meeting, 51.1% stated there is no difference, and 1.8% reported social media comments are given more weight. Furthermore, 65% of respondents reported that they use social media to channel citizens to “more formal” methods of citizen participation (See Table 4.11).

<table>
<thead>
<tr>
<th>Measure</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hold public meetings?</td>
<td>349</td>
<td>Yes</td>
<td>227</td>
<td>65</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>122</td>
<td>35</td>
</tr>
<tr>
<td>Social media comment</td>
<td>227</td>
<td>More weight</td>
<td>4</td>
<td>1.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Less weight</td>
<td>107</td>
<td>47.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Same weight</td>
<td>116</td>
<td>51.1</td>
</tr>
<tr>
<td>Channel to formal method?</td>
<td>223</td>
<td>Yes</td>
<td>145</td>
<td>65</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>78</td>
<td>35</td>
</tr>
</tbody>
</table>

Of the 107 respondents that said comments on social media receive less weight than comments in public meetings, the majority (53.3%) said they receive less weight because social media is not a formal channel of participation. The other top reasons given for the less than equal treatment for social media comments were: comments were out of view of senior leaders, comments are less credible, law favors public meetings, and concerns about user identity (See Table 4.12).

<table>
<thead>
<tr>
<th>Reasons given by respondents</th>
<th>Count</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not a formal channel of participation</td>
<td>57</td>
<td>53.3</td>
</tr>
<tr>
<td>Out of the view of senior leaders</td>
<td>47</td>
<td>43.9</td>
</tr>
<tr>
<td>Less credible</td>
<td>39</td>
<td>36.4</td>
</tr>
<tr>
<td>The law favors public meetings</td>
<td>32</td>
<td>29.9</td>
</tr>
<tr>
<td>Concerns about user identity</td>
<td>16</td>
<td>15</td>
</tr>
</tbody>
</table>

Analyzing the Role of Senior Leaders

Respondents were asked about senior leader’s technology use, information habits, and
stance toward social media. Most senior leaders continue to get their information from traditional
news sources and do not use social media. For example, 53.6% of respondents said senior leaders
get most of their first-hand information from traditional news sources; 46.4% said they had
mixed sources of information; and none said social media was the main source of information.
Only 29.8% of respondents said that senior leaders in their organizations use social media. The
numbers are lower when it comes to social media engagement. Only 7.7% of respondents said
senior leaders engage with stakeholders on social media. This is important because 90.4% of
respondents reported that senior leaders who use social media are more likely to believe it is
important. Overall, 36.9% of respondents said senior leaders view their organization’s social
media engagement as “not very important.” More than half of respondents said senior leaders are
“out of touch” with younger stakeholders (See Table 4.13).

<table>
<thead>
<tr>
<th>Measure</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social media usage</td>
<td>349</td>
<td>Yes</td>
<td>104</td>
<td>29.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>245</td>
<td>70.2</td>
</tr>
<tr>
<td>Stakeholder engagement – social media</td>
<td>349</td>
<td>Yes</td>
<td>27</td>
<td>7.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>322</td>
<td>92.3</td>
</tr>
<tr>
<td>First-hand information</td>
<td>293</td>
<td>Traditional sources</td>
<td>157</td>
<td>53.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mix of sources</td>
<td>136</td>
<td>46.4</td>
</tr>
<tr>
<td>View as important</td>
<td>293</td>
<td>Very important</td>
<td>185</td>
<td>63.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not very important</td>
<td>108</td>
<td>36.9</td>
</tr>
<tr>
<td>Connection between use and view of importance</td>
<td>293</td>
<td>Yes</td>
<td>265</td>
<td>90.4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>28</td>
<td>9.6</td>
</tr>
<tr>
<td>In touch with younger stakeholders</td>
<td>293</td>
<td>Yes</td>
<td>136</td>
<td>46.4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>157</td>
<td>53.6</td>
</tr>
</tbody>
</table>

**Analyzing the Role of Beliefs about Social Media**

Beliefs play a role in how public organizations treat citizen participation via social media.
Public organizations view social media as less risky than traditional media. Among the respondents, 82.9% said the impression left by traditional news is more lasting than a social media post. And 49.1% believe an item in the news about their organization will reach more people than on social media. If traditional media leaves a more lasting impression and has greater reach, than it logically follows that information from those media would be treated differently than social media. “If it’s coming from traditional media, from a reporter, yes, it’s treated more seriously,” said one interviewee. “I just think that there is a feeling that the more traditional media sometimes actually reaches more people than some of our social media. I don’t know that that’s true anymore, but that was the way, you know, it has certainly been perceived in the past. And so, if there was going to be response, it was probably even faster if it’s something that came through traditional media than it was in social media.”

Not only do most senior communications practitioners believe traditional media leaves a more lasting impression than social media, they also believe it is potentially more damaging. Of the respondents, 41.6% said that negative information from traditional media is more damaging to the organization than negative information from social media, 15.7% stated that traditional media is less damaging, and 42.7% believe there is no difference in damage. This general perception of social media as low risk is displayed in other ways. For example, 75.4% of respondents said that something about their organization was not likely to ‘go viral’ (See Table 4.14). Organizations that show little concern about information going viral on social media are exhibiting behaviors that veer from legitimacy.
Table 4.14. Beliefs about Social Media

<table>
<thead>
<tr>
<th>Measure</th>
<th>n</th>
<th>Answer</th>
<th>Count</th>
<th>Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Traditional news greater reach?</td>
<td>293</td>
<td>Yes</td>
<td>144</td>
<td>49.1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>149</td>
<td>50.9</td>
</tr>
<tr>
<td>More lasting impression</td>
<td>293</td>
<td>Traditional</td>
<td>243</td>
<td>82.9</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Social</td>
<td>50</td>
<td>17.1</td>
</tr>
<tr>
<td>More damaging</td>
<td>293</td>
<td>Social</td>
<td>46</td>
<td>15.7</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Traditional</td>
<td>122</td>
<td>41.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No difference</td>
<td>125</td>
<td>42.7</td>
</tr>
<tr>
<td>Likely to go viral?</td>
<td>293</td>
<td>Yes</td>
<td>72</td>
<td>24.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>221</td>
<td>75.4</td>
</tr>
</tbody>
</table>
Chapter 5
Conclusions

My research question was: how does public agency behavior currently treat citizen participation on social media, and what recommendations can be made to maximize the opportunity for such participation? Using the evaluative framework I developed, the Social Media Participation Range, the study results clearly show that public agency behavior treats citizen participation on social media as mostly token. Substantively equivalent information is treated differently – and with less care – when it comes from social media.

Public Comments via Social Media

The public comment function is sometimes the only direct opportunity for citizens voices to be heard in official decision making processes. How public comments are handled by those in custody of them is a clear indication of their legitimacy. Are the comments documented as part of a decision making process? Are the comments mitigated by the agency if found to be substantive? In general, the answer appears to be no. Comments made via social media do not receive the same treatment as comments made in a public meeting context.

Almost half of respondents said that citizen comments made via social media receive less weight than comments made in public meetings, and only 1.8% said social media comments receive more weight. The discounting of a comment because of the method through which it is delivered is a form of medium bias. This illustrates the chasm between agency treatment of social media and citizen expectation for their interactions. There is no evidence that citizens have anything less than full expectation they are engaged in legitimate policy discourse through social media. If citizens were aware of this discount, it could significantly alter their attitudes and behaviors.

Sixty-five percent of respondents said they use social media to channel citizens to “more
formal” methods of citizen participation. This is further evidence of method bias. The phenomenon described is an attempt to drive citizens to participate in a traditional way, such as public meetings, rather than legitimizing their participation in the medium citizens are comfortable. This is problematic because the definition of what is formal is simply the enacted preference of the agency. The logic goes: The law allows us to define our program. Our program is public meetings; therefore, public meetings is what is formal. Social media is not formal. One interviewee said, “Although people can leave their comments on Facebook, we have not folded that into the official record. It just isn’t part of the process. Legally, it’s not required… We’ll tell people how they can provide their input and that’s either through email or they can write a letter… It’s still fairly old-fashioned.” In this way, agencies are not aligned with citizen communications preferences or practices, nor are they taking advantage of the time and place benefits that social media brings.

It is a common practice for public agencies to post notice of public meetings pertaining to specific topics on social media sites. It is not unreasonable for citizens to believe that agencies want meaningful input on these very sites. What happens when a citizen responds to the post with a substantive comment pertaining to the meeting topic? The study results indicate that, many times, the comment is discounted, if considered at all. One interviewee said, “Well, we told you that that will not necessarily be considered an official comment and you should send it to this other channel. So, that was up to you whether you did that or not.” A substantively similar comment can be treated entirely differently depending on the medium through which it is delivered. For agencies implementing NEPA, they are required by policy to incorporate substantive citizen comments into environmental documents and mitigate them. Currently, that citizen comment on the agency social media site could be left without agency acknowledgement
Why do organizations give citizen comments via social media less weight than comments made in public meetings? Over half said that social media is not a “formal channel of participation.” The question of formality is often in the eye of the beholder. Formality is defined by – and often boils down to – agency preference, regardless of citizen expectation. One survey respondent echoed a famous saying, “Government is run by those who show up.” This sentiment was also conveyed by a number of interviewees, including one who advised how citizens and stakeholders should have their voice heard: “If we’re going to have a public meeting, it means that the right players would be in the room and would be hearing the information [from you] firsthand. If you’re putting [your input] on social media, you’re not getting the same attention that you’d get if you were standing in front of a microphone and in front of a group of administrators.” Holding fast to formality helps organizations avoid logistical challenges posed by public comments on social media. One interviewee said, “And I won’t call it a policy. It’s definitely procedural. When we started Facebook and Twitter and everything, we felt that it could become unmanageable if everyone just started putting a comment up here or there, and so we wanted to relegate them to using our formal channels.” The interviewee went on to say it is more difficult to understand commenter’s intentions when delivered on social media and wondered whether the full thread in a social media conversation would be documented or only parts of it. Another interviewee also described the logistical problem of having to search social media sites for comments rather than comments arriving directly in an email inbox.

More than a third of respondents said citizen comments via social media are given less weight because social media is less credible. This view of credibility could be explained in a number of ways, and the interviews shed some light. The fact social media comments are not
delivered in-person, such as meetings, seem to undermine the substance of the comments as far as interviewees were concerned. One interviewee suggested that not showing up in-person called into question the commenters’ commitment to the issue, saying, “If we have a person who came to the meeting and invested their time, and was one-on-one, well then we know who that person is. I mean that stock goes up because they have put the time in [to attend the meeting] and there’s value there.” The interviewee also said that not delivering comments in person is liberating for the commenter, which is negative according to the interviewee. “You are a little more free with what you say than if you do it in person,” the interviewee said. “I think that’s a drawback. Sometimes, it’s not as serious as the one-on-one. Yeah, I think when you get on social media, sometimes, you have a bit of a different personality than you would in a one-on-one setting.”

Other interviewees and survey respondents said social media requires less effort, “draws a disproportionate amount of negativity,” and contains less informed commenters. The explanations given for discounting comments from social media demand further study to arrive at common definitions of formality and credibility, and understand how pervasive the interviewees’ perspectives are across sectors. Regardless, senior communications practitioners must confront their own biases and contribute to ushering in the legitimacy of social media.

Only 15% of survey respondents said citizen comments via social media are given less weight due to concerns over user identity. The general lack of concern for user identity is interesting. One possible explanation is that senior communications practitioners have become comfortable with online formats and have not let occasional issues of anonymity overshadow substantive input. Another potential explanation is that senior communications practitioners have similar concerns with identity in meetings. After all, it is common for citizens to make public comments at a meeting simply by signing a sign-in sheet – there is no authentication process. A
citizen who uses an avatar for a profile picture on social media is no less authentic than a group of well-rehearsed citizens, reading off of the same script in favor or against an issue or project.

**The Role of Law.** The letter of the law appears to be an important factor in the legitimization of social media. Thirty percent of respondents said citizen comments via social media are given less weight because the law favors public meetings. This is true of NEPA regulations, for example, where public meetings are mentioned, and where there is no mention of social media. Public organizations are often focused on compliance rather than innovation. Some would describe it as “checking off the boxes.” If the law requires public meetings and is silent on social media, one can expect the agency to offer public meetings in order to comply. If the law was silent on methods but required a high volume of public input in alignment with citizen communications preferences, agencies might very well employ social media in conjunction with or in place of public meetings to comply. If the law required public meetings, social media, and other specific methods, agencies would approach these methods in terms of compliance.

The lack of legal clarity on whether comments via social media must be documented for federal decision making processes, like NEPA, is a risk for agencies. This question is ripe for legal challenge. A lawsuit from a citizen who makes a substantive comment on an agency Facebook page which goes undocumented – and unmitigated – could derail a public project by tying it up in the courts. Most interviewed expressed a lack of clarity and confidence about how the law treats public comments via social media. Policy makers can use information from this study to clarify public participation policy, balance traditional and new media methods, and provide agencies with clear guidance for public participation and help them avoid litigation.

If social media were treated equally, citizens would benefit and government would become more responsive. And if social media were incorporated into a much more
comprehensive rethinking of public participation, it could potentially lead to a more dramatic and far-reaching expansion of democracy. “There’s a low threshold to participate,” said one interviewee. “You download it [social media applications], and you begin a conversation. I think it’s empowering.” Citizens could participate in the manner most comfortable, convenient, and cost-effective for them rather than having to conform to agency communications preferences rife with barriers. Leveling the playing field for social media participation would open up public decision-making to more citizens on the political fringe, particularly youth and racial/ethnic and income minorities who use social media most. Said, one interviewee, “We know that anything high tech and that’s short, interesting, and fun is how our younger generation and our minorities [engage]. We found through our citizen surveys that they really respond and get a lot of their information from our social media, more so than the white middle class and middle age…I think it was a surprising trend for many, but it’s just the reality.”

**Role of Senior Leaders**

Over 40% said citizen comments via social media are given less weight because social media is out of the view of senior leaders. In other words, senior leaders discount social media, so it is discounted by the agency. To the extent that communications practitioners believe that engaging in social media is a best practice, they appear to be eschewing their own preferences to stay in line with senior leader communication habits. A president or senior leadership team supportive of social media has an opposite effect. One interviewee said, “If our president didn’t value social media, obviously, the rest of the organization wouldn’t either. His support for it and his understanding and belief in its importance has allowed us to really begin to change the way our office operates and the way the rest of the campus operates.” Communication professionals in general will not risk substituting the senior leader’s personal communications preferences for
best practice, which highlights the importance of social media adoption and engagement by senior leaders.

This explanation for the discounting of public comments made via social media shows how heavily the role of the senior leader can play within organizational culture and practice. Senior leaders in a public organization are public policy makers. Policy is made through their decision making. Therefore, senior leader social media habits and beliefs that contribute to their understanding of public issues and citizen concerns are important (See Table 5.1). The role that senior leaders play in organizational social media is an indicator of its legitimacy. The study results show a pattern of tokenism when it comes to the role of senior leaders in organizational social media.

<table>
<thead>
<tr>
<th>Table 5.1. Senior Leaders and Social Media</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Source of most first-hand information from social media?</strong></td>
</tr>
<tr>
<td></td>
</tr>
<tr>
<td>Use social media?</td>
</tr>
<tr>
<td>Engage with stakeholders on social media?</td>
</tr>
<tr>
<td>In touch with youth?</td>
</tr>
<tr>
<td>As concerned for reputation in social media as traditional media?</td>
</tr>
<tr>
<td>As involved in preparation of social media as press releases?</td>
</tr>
<tr>
<td>As involved in preparation of social media as editorials?</td>
</tr>
<tr>
<td>Believe social media very important for organization?</td>
</tr>
</tbody>
</table>

Today’s senior public officials still get most of their first-hand information from traditional news sources, even if this is not reflective of how other agency staff get their information. Over half of respondents said that senior leaders in their organizations get most of their first-hand information from traditional sources, whereas none said senior leaders get most of their first-hand information from social media. Despite the facts that newspapers are waning in influence in general audiences (Kaiser, 2014), many of these senior leaders still thumb through their morning newspaper edition before heading off to work. Most striking, perhaps, are the
results related to senior leader social media adoption and engagement. Only 29.8% of respondents said senior leaders in their organization use social media and only 7.7% reported senior leaders engage with stakeholders on these platforms.

There is a gaping hole between the social media habits of the senior leaders in question and most other demographic categories. According to the study results, senior leaders’ use of social media is extremely low. Senior leaders, by virtue of the typical years of professional experience required for their positions, skew toward an older demographic. Said one interviewee, “I think it has to do with – not to be discriminatory – but with age a little bit and what people are used to. People who have adopted technology a little more and see how much is going on there know the power; and those who haven’t engaged as much and use traditional forms may not realize the level of activity happening on social media.” But age alone cannot explain this disparity. After all, 63% of all adults online between the ages of 50 – 64 use Facebook (Duggan, Ellison, Lampe, Lenhart, & Madden, 2015). It might be that senior leaders, because of their elevated positions and reliance on staff for execution, are shielded from the need to understand common tasks or basic customer concerns. Regardless of the cause, this phenomenon puts senior leaders out of step with the rest of society when it comes to technology adoption, which makes them particularly at risk of detachment from youth and racial/ethnic and income minorities who prefer social media to communicate. More than half of respondents said senior leaders were out of touch with younger stakeholders.

It is no wonder that more than one-third said senior leaders do not view the organization’s social media efforts as very important. Said one interviewee:

“Yes. If it [information] is coming from traditional media, from a reporter, yes, it’s treated more seriously I would say in general… I just think that there is a feeling that the more traditional media sometimes actually reaches more people than some of our social media. I don’t know that that’s true anymore, but that was the way, you know, it has
certainly been perceived in the past. And so, if there was going to be response, it was probably even faster if it’s something that came through traditional media than it was in social media.”

These senior leaders do not use social media, so, it should not be surprising that they struggle to understand social media and its value. Study participants make this point overwhelmingly (90%): senior leaders who use social media are more likely to believe it is important. Furthermore, senior leaders are more concerned about their reputations in traditional media than in social media. The majority of respondents said senior leaders were very concerned about their reputation on traditional media, whereas only 18.4% were very concerned with their social media reputations. Less than 10% said senior leaders were hardly or not concerned about their reputations on traditional media, whereas more than one third were hardly or not concerned about their social media reputation. One interviewee explained the disparity this way:

“When something bad gets printed in the paper, it’s like physical evidence, and for some reason, that hits senior leaders harder. When you see your name or your organization, and it’s there in black and white on a piece of paper, I just think it has more initial impact. It’s going to take some time to continue stressing [to leaders] that even if it’s not printed on a piece of paper that lands on your doorstep or on your desk, the benefit or detriment can be just as great if not greater via social media.”

Another interviewee said:

“I think when there’s bad traditional press, that’s considered worse than when there’s unfavorable things being said on social media, and I think that’s wrong. There was a comment made to me [by the president] when we had a bad editorial, but that was taken more serious than all the good stuff that was happening on social media related to the same subject. The newspaper doesn’t have the following that social media does. You know, readership of print publications, viewership of news stations, that’s all going down.”

Senior leaders are also less involved in the preparation of social media content (e.g. tweets) than for traditional media (e.g. press releases or editorials). It is not uncommon for senior leaders, even the president of an organization, to be involved in the preparation of vehicles to news publishing. After all, senior leaders read these publications – and so do their friends. They
care very much how they – and their organizations – are portrayed. “[Social media] is treated differently because of the nature of who’s seeing it,” said one interviewee. “So we just don’t have, particularly at the senior level, we just don’t have a lot of people who follow social media, participate, you know, in any way. And where it comes to the traditional news outlets, more people are seeing it so more people are reacting to things.” The president might be the very last set of eyes on a press release or editorial before communications staff sends it out. The sheer volume of social media, for some organizations, makes it impractical that senior leaders are involved in preparation of all posts. As people who do not use social media to engage with stakeholders and have less concern for these media, it is also not a surprise senior leaders are less involved in preparation of it.

**Internal Sharing**

The internal sharing of information is an indicator of legitimacy. As it is the communicator’s job to scan media and share internally to raise awareness of what is being said about the organization, the act of sharing (or not sharing) is a vital one; it is the stimuli for an entire range of organizational responses. This study shows a pattern of tokenism when it comes to the internal sharing of information from social media. Specifically, information from social media is shared with less frequency, immediacy, and with more caveats. In the absence of sharing, organizations have no reason to respond. Forty-five percent of respondents *always* shared traditional news with senior leaders in their organization, whereas only 13.5% *always* shared social media with senior leaders. Only 5.5% of respondents said they shared traditional news *rarely* or *never* with senior leaders, whereas 31.5% said they shared social media with senior leaders *rarely* or *never*. In sum, almost a third of communicators rarely or never share social media information with senior leaders who are making public policy decisions.
The categories of traditional information shared are much more wide ranging than social media, an indicator of social media tokenism. Over two-thirds of respondents said they share all news, by far the largest category, whereas only 16.9% said they share all posts on social media. There are very practical reasons for this – volume, is one. It is possible that an organization receives only one mention per day in the press, but receives hundreds on social media. Sharing hundreds of social mentions daily may be difficult for communicators to organize, or may be overload for those who receive the information. But information from social media is shared much less freely. Over half of respondents said they share only high risk posts from social media with senior leaders, whereas only 18.5% said they shared only high risk news. In other words, information from traditional media was generally assumed to carry risk and thus shared more freely. In contrast, social media was generally assumed to be innocuous and thus only shared when the exceptional high risk post was encountered.

The immediacy with which information from social media is shared is also an indicator of tokenism. Over a quarter of respondents report sharing traditional news on a daily basis with senior leaders, whereas only 6.5% share social media information daily. This can be explained by the development and distribution of a compilation of ‘daily news clips,’ an approach that many communicators take in internal information sharing. Sometimes organizations pay for a third party “clipping service” that will compile the news clips for staff. These results show that there is no similar compilation of daily social media clips.

Interviewees spoke at length about how seriously the responsibility of compiling and distributing traditional news clips is taken. An associate vice president at a mid-sized university reported it takes 90 minutes each day to compile the news clips and said, “It began with our senior leadership only, the president of council. But there grew to be so much interest in it, I
think, we’re over 300 to 400 people now that it goes out to every single day… But it proves valuable because of what it did – it helped us break down that wall between campus and community.” On the pervasive sharing within one organization, an interviewee said, “We share the news clips with every employee who has email. We do everything electronically online, and we collect them, and we send them out. And we also have an intranet and they’re posted there as well too. So everyone has access to see what’s been said about and what’s in the news.” On third party clipping services, another interviewee said, “We sort of survey the headlines every day for all the regional media, and really the media across the country. We have a couple of media monitoring services that help us make sure we don’t miss something, and so, you know, we have two different media monitoring services in addition to our, you know, manual way of picking up stuff. And so, we send out headlines and media mentions list at least twice a week, sometimes more, and then if there’s something that actually aired on a radio station or TV station, then we share those as part of that.”

When communicators are scanning media, they are looking for mentions of their organization and information relevant to them. The study results show that when communicators come upon information about their organization in traditional news, they freely share it with others in their organization, including senior leaders, maybe even their board. Over 80% do one of two things with the information: either they share it immediately, or they share it as part of a daily compilation of news clips. They also distribute it to those most affected within the organization. For example, a news report on the cleanliness of buses in a public transit agency would be sent to the head of the maintenance department who employs the nightly cleaning crew.

What happens when communicators come across substantively similar information from
social media sources? For example, a customer who tweets “this bus is dirty.” The study results demonstrate that this information is shared less freely inside the organization. There is a more complicated determination that takes place regarding whether to share information. The communicator conducts an informal risk assessment and shares the information only if he/she deems its high risk. What goes into such a risk assessment? One possible risk could be the likelihood of others on social media seeing the negative information. So, communicators may ask themselves, does the person who reported the dirty bus information have many followers on social media who are likely to see his/her post? Is the post likely to go viral? Maybe the risk is the likelihood of a post to spiral into mainstream news. Perhaps “ordinary” transit cleanliness issues are deemed not newsworthy, but another incident, like cell phone video of a bus driver texting while driving, is deemed newsworthy? Because of differences in internal information sharing, it is possible for senior leaders to be made aware of a news report about bus cleanliness while kept in the dark about a self-published social media post on the same subject.

One thing is clear, there is a lot of personal subjectivity when it comes to determining whether information is high risk. One interviewee said, “It’s kind of a gut feeling … when I know that something has the potential of being controversial or has the potential of someone setting the narrative before we have an opportunity to, those are the things that rise to the occasion. If I know that we need to be prepared with an answer or a response or to be proactive in launching that first salvo, that’s information that I start circulating to the right audiences for discussion purposes.” Another interviewee admitted that follower count plays at part in risk assessment, saying “If it’s on Twitter, we look to see OK, how many followers does this person have? You know, is this low impact or is this being seen by a ton of folks? Sometimes that is a determining factor. If it’s toxic, we may ignore it.”
Information Sharing as Stimuli

Study results show that social media triggered less discussion amongst senior staff than information from traditional news sources. Senior level discussion is important because it is the precursor to action. Shared information is the stimuli upon which an organization may react. A single senior staffer or even the president could initiate an inquiry of organizational practices or policy as a result of the information coming to light. Without sharing internally with senior decision makers, a piece of information is unlikely to be acted upon. In the absence of scanning, assessing, and sharing (SAS), senior decision makers would have to know a piece of information on their own in order act on it. This is possible through senior leader’s personal media scanning habits; however, without staff intervention, information is more likely to bypass senior leaders.

Over 65% of respondents reported that traditional news always or frequently triggered discussion amongst senior leaders, whereas less than 25% said social media always or frequently triggered discussion. Over 75% said social media rarely or never triggered such discussion, whereas less than a third said the same about traditional media. Because senior leaders do not use social media to engage with stakeholders and have less concern for these media, it is also not a surprise that shared posts trigger less discussion than traditional media does.

Similar patterns were found when it comes to how an organization responds or changes due to information as stimuli. Organizations responded to (or changed as a result of) information from traditional media more often than when the information came from social media. This applied to negative information, specifically, as well. These responses or changes could take many forms. A practice or policy could be changed. An employee could be subject to discipline. Outside authorities could be called upon to investigate. The organization may issue a public statement or address the information on their social media pages, website, or in a newspaper op-
ed. None of this is possible without the original act of sharing. And all of these responses are examples of organizations employing a high level of care with information.

Four different experiences provided by interviewees illustrate the potential impact of shared information. An associate vice president in a mid-sized university reported that a news story provoked a review of the university’s maintenance of an online sexual predators list. The story highlighted how the university was not providing the information via the web, like large universities in the state. Instead, it required students and staff to walk in an office to request it. “And so that is leading us to review our policy of making people come in and request a copy,” said the interviewee. “So, we’re actually reviewing – can we provide those online? You know, is it time to revise that policy?”

A communications manager at a large suburban public transit agency reported that a news story led to modifications of an agency policy. The manager’s agency had adopted a policy for advertisement content and rejected a proposed ad from a gun rights group under this policy. The group complained to the news media and a story ran as a result. “It was fairly unfavorable towards us, and so we had to get together and strategize over this... [we] had to come up with the messaging and this involved a lot of discussions with our legal counsel, and then we went forth with that and spoke to the news organization that initially reported it...We did recognize that the [policy] definitions were ambiguous and left it for us to be, you know, fairly criticized for saying ‘you could exclude anything under this policy.’ And so we defined it [policy] more narrowly so that it really focused on what we were trying to accomplish.”

A communications director for a mid-sized city reported that news coverage that featured an accusation of favoritism in the hiring of a towing company led to policy clarification and changes. Negative news coverage also caused a state secretary of transportation to put pressure
on a private company with tolling authority in the state to change its practices that had led to unreasonable fees for motorists.

Would the same level of care be extended to social media reports? Extending the dirty bus example: a television news report which airs an “undercover investigation” about the cleanliness of buses would quickly be shared internally and capture the attention of the organization. The president might ask the senior leadership team, “Is this news report indicative of our typical bus cleanliness, or are these isolated incidents?” The senior staffers might pull data on customer service complaint trends to analyze whether there has been a spike in dirty bus complaints, as well as reports that indicate how often each bus is cleaned. Discussion of this data amongst senior leaders, in light of the news report, might result in further questions, such as: “Is our bus cleaning practice or policy sufficient? Does it need to be amended? How will we respond back to the television station and its viewers who are concerned about dirty buses? And what will we say to our customers?” The study results show information from traditional news is more likely to result in one of these organizational responses or changes. However, customers tweeting “this bus is dirty” is less likely to trigger a similar reaction from the same public transit agency. There is a lower level of care given to information on social media than traditional media.

**Organizational Structure**

The study results show a pattern of tokenism when it comes to the organizational structure to support social media in public agencies. The organizational distance between personnel responsible for agency social media and senior leadership is one indication of the importance that an organization puts on social media. The more on the periphery of the organization these communicators are, the less likely they are to understand the scope of issues important to senior decision makers.
In more than half of the organizations surveyed, communications staff who work on traditional news issues rank higher than staff who work on social media. In these organizations, sometimes the staff responsible for day to day social media activities are front-line communicators – resembling customer service agents – rather than senior strategists. To this point, one survey respondent said, “The person handling social media is totally unqualified and has not been with the company for very long. She does not know the infrastructure or understand dynamics.” This organizational structure could be attributed to bias, but there are practical explanations too. The sheer volume of social media mentions for some organizations make it impractical for a communications director to maintain these responsibilities – they must delegate the common interactions to someone else.

Other factors contribute to the structural bias that was found. Today, with its relative newness, social media is an add-on for many organizations. They had an existing communications structure when social media came along, then they added responsibility for social media to that structure. In some organizations, dedicated staff have been hired to take on this additional responsibility. Hiring staff with social media skills increases the legitimacy of the medium, but burying that staff in a structure designed prior to the advent of social media undermines the legitimacy. Sometimes organizations hire social media staff whose expertise is the mechanics of the platforms rather than in communications strategy. One interviewee said, referring to the organization’s social media expert, “She’s called the communications specialist. She’s like twenty-something and really up on all the social media tools.” For senior communications practitioners, it can be easier to hire a ‘young whippersnapper’ than to develop one’s own understanding of social media. Another interviewee said, “As the director, I oversee the big picture… and I pretty much leave all that [social media] up to him as that’s totally his
territory. He keeps me abreast as to what’s going on, but he completely has the run with it … I leave that all to him.” In these cases, the social media tokenism could be just as severe with senior communicators as it is with senior leaders.

Many communications directors or public information officers came to their positions as experts in news media relations at a time when news media were the primary communications channels to the public. One interviewee said about primarily handling media relations, “Honestly, because that’s probably where the bulk of my expertise is. Since I came from that world, I’m a little bit more comfortable in it, and so that’s what I choose to do.” Today, communications director positions are held by the most senior and polished communicators because of the reputational issues at stake and perception of news as high risk. But today, risk to reputation is shared across more platforms, including social media.

**Role of Communications Practitioner Training.** Too many organizations define their social media success in terms of engagement. Meanwhile, the prevailing public relations education and training is rooted in a framework of ‘agenda setting’ where students and practitioners are taught how to use communications to influence how different publics behave in order to advance the organization’s agenda. The prevailing literature and training does not account for an emergent agenda set by social media users.

Communications practitioners should take ownership in shifting organization ideals of social media away from engagement and toward legitimacy. They can be internal champions with senior leaders for social media in order to achieve systems change. One interviewee described an approach to changing minds: “It’s just showing them [senior leaders] the statistics, showing them the responses, showing them the things that we’re putting out… They’re coming around, but you know, they’re so used to the traditional way of doing business in government
that this is still kind of a novelty to them in a lot of ways.” Despite this promising comment, the broader field of communications may not be prepared to meet this challenge today because of lack of expert practitioners and industry best practices on the subject of social media legitimacy.

**Organizational Beliefs**

The study results show a pattern of tokenism when it comes to organizational beliefs about social media. Results show that senior communicators believe that traditional media has greater reach, is more lasting, and more potentially damaging than social media. And they do not believe information concerning their organization is likely to go viral. In sum, public organizations perceive that social media is low risk, at least when compared to traditional media. Comments from two different interviewees illustrate how beliefs about social media influence organizational behavior toward information from it. These comments concern objectivity versus opinion, scope of audience, and accuracy of information. One interviewee said:

“We do have a very distinct view of the difference between social media and traditional news organizations, and I think that that’s because 1) this view that the traditional media outlets have a greater audience, and that 2) that they are a more objective voice… It’s more likely to be reported correctly than, you know, someone who says, you know, whatever.”

The second interviewee said:

“Well, the information we receive on social media is mainly from citizen’s comment or something. Whereas your traditional news source is a reporter who put that together or a professional journalist who put that together and you’ve got both sides of the story. So it’s a little bit different. You’re getting someone’s opinion and comment on social media whereas you’re getting a full story with all facts generally from the traditional media. We very much care what citizens think, but if we just had two or three people comment on a post, I’m not going to… you know, that’s two or three people who commented on a post. If we had thousands, that would be a different deal, and then I would say, “OK, what’s going down? What are they upset about?”… Social media allows anybody to share their views unfiltered, whereas the traditional media, a reporter is writing a story, and whose I would hope goal is to get both sides of the story and to get the facts right so that they can portray an issue or an incident truthfully instead of based on opinion or an experience.”

Nearly half of respondents believe that social media has less reach than traditional news.
This is based on the false notion that information on social media is isolated to a user and, perhaps, his or her modest social media network. In reality, information on social media is not isolated. One moment, any post could appear isolated; the next moment, it could be global due to the viral nature of the medium. Take the story of Justine Sacco, a public relations executive on her way from the U.S. to South Africa, who sent an insensitive tweet concerning the AIDS virus to her small Twitter following before take-off. While aboard the 11-hour flight, the tweet went viral. Sacco’s tweet received tens of thousands of angry responses and created such a firestorm her employer issued a public condemnation, all before she landed and was even aware of the situation. Sacco was fired later that day (Ronson, 2015). This denial of social reach could be explained by how public organizations view the potential of virality. Over 75% of respondents do not believe that information concerning their organization is likely to go viral. This is a perception of social media as low risk.

More than 80% of respondents believe that traditional media leaves a more lasting impression than social media. Though today’s news cycle moves fast, social media moves faster. The subject in one’s social media feed changes minute by minute. What is trending worldwide today might be passé tomorrow. Perhaps it is this dynamism that leads to the conclusion the impression social media leaves is less lasting than traditional news. This is a perception of social media as low risk. One likely explanation is respondents believe traditional media makes a more lasting impression and is potentially more damaging because this is where senior leaders – and other organization influencers – get most of their information from. In other words, because senior leaders and their associates do not pay much attention to social media, the impression it leaves seems more fleeting and less harmful.
Social Media Risk/Care Axis

The question of social media legitimacy is one of citizen influence on public service and decision making. Though there are, perhaps, some risks to an agency associated with the misalignment of government actions and citizen desires, such as legislative scrutiny, the citizen is the bigger loser. After all, when social media legitimacy is lacking – or tokenism is prominent – public agencies may continue with planned service provision, decisions, or projects without the benefit of citizen input. However, when one pivots away from a frame of citizen participation to a frame of citizen journalism when thinking about social media, public organizations have far more at stake. And just as a citizen comment via social media as part of a public project could prove crucial to better project design, a citizen report on social media of a major agency failure could prove crucial to agency reputation and stability.

The inward expression of many of the indicators of social media legitimacy could be interpreted by an organization as questions of information risk and information care. Information risk is the risk that a piece of information poses to an organization’s stability. Information care is the care given to a piece of information by an organization. Organizations treat information along a spectrum of risk and simultaneously along a spectrum of care.

To illustrate the convergence of these two important principles – information care and information risk – I created a Social Media Risk/Care Axis (Figure 5.1). The $x$-axis represents Organizational Perception of information on social media with Low Risk on the negative pole and High Risk at the positive pole. The $y$-axis represents Organizational Treatment of social media with High Care on the positive pole and Low Care on the negative pole. The Social Media Risk/Care Axis can be used for case-by-case evaluation of an organization and a single social media post that is relative to it, but is best used as an overall yardstick of an organization’s
behavior toward social media.

**Figure 5.1. Social Media Risk/Care Axis**

The Social Media Risk/Care Axis illustrates the current state of many public organizations based on the study findings – that many organizations perceive information from social media as low risk and take a low level of care with it. I found that many organizations
perceive social media as Low Risk, as indicated by belief that social media:

- Lacks credibility
- Has low reach
- Is unlikely to go viral
- Does not leave a lasting impression
- Does less damage
- Lacks formality

I found that many organizations treat information on social media with a Low Care, as indicated by the following practices:

- Low share frequency
- Less types shared
- Low organizational response or change
- Lack of share immediacy
- Low leadership involvement
- Low senior leader discussion

**Vulnerability due to Social Media.** Organizations that are both Low Risk and Low Care are highly vulnerable. They neither perceive the risk associated with social media nor do they carry out practices that would enable an organization to avert major reputational harms. This study’s findings suggest that there is a strong relationship between risk and care, but further research is needed in order to verify that.

The problem with Low Risk/Low Care organizations is that their perceptions do not match the reality of social media, given the voluminous examples of how credible information on social media was superior to any other medium. (See, for example, O’Dell (2011) describing one Twitter user reports live from Osama Bin Laden raid, and The San Francisco Globe (2014) article about how the FSU library shooting unfolds as students post live updates to Facebook and Twitter). Because they discount social media, these organizations are ill prepared for the shock to the organization a piece of information can bring.

Social media is high risk. Information on social media can be superior to information
found on any other medium because every citizen with a mobile phone can self-publish events in the world around them. Information from social media poses great risk to organizations but most display little care for it as evidenced by the practices described above. Ideal state organizations recognize the risk that social media poses and entrench high care practices.

**Recommendations**

**Recommendation #1:** Public officials should give citizen comments via social media equal weight to comments made by other methods.

Discounting comments made via social media is at best medium bias, at worst it is anti-democratic. This practice leaves readily available citizen input on the table. There is no substantive reason to treat citizen comments made via social media with less weight than a comment made through another medium, including in-person. Citizen comments made via social media on a topic before a town council meeting should be entered into the record as that topic is debated and decided. Likewise, citizen comments made via social media on a major construction project in the NEPA process should be documented for mitigation, if substantive.

All comments made via social media should receive responses and recognition in final transcripts of decision making proceedings. If a public body will gather to take a vote upon the conclusion of a public comment period, citizen comments from social media should be provided to voting officials or read aloud beforehand. Organizations should change internal practices to increase the flow of information from social media sources and its effect. Decisions will reflect more democratic processes and the broadest available public input, regardless of method of delivery.

**Recommendation #2:** Citizen comments via social media should be documented in the public record for the sake of public decision making.

To minimize administrative burden, public administrators should use social media
monitoring applications to capture comments and convert them to file types that are most commonly used to organize and share data. Records and transcripts of public proceedings and decision making processes should be made available for public inspection to ensure comments via social media have been incorporated.

**Recommendation #3:** Agencies should post Citizen Ground Rules on social media pages in order set proper expectations for citizen participation.

Will citizen comments on social media pages be documented in the decision making process, or won’t they? At minimum, how an organization will treat citizen comments should be made abundantly clear on any social media pages; if comments on the page will not be documented for decision making purposes, it must say so. The benefits of social media aside, it is anti-democratic that citizens might have used other methods to provide their input in a public decision making process if only they had known their comment made via social media was discounted.

Social media pages maintained by organizations should plainly state, as a disclaimer, how comments from citizens and stakeholders will be treated when posted. Disclaimers should contain information including, but not limited to: whether comments will receive responses, and whether comments will be incorporated in decision making processes and documented. Citizens should observe the Ground Rules to adjust personal expectations of the effect of their social media engagement

**Recommendation #4:** The law should make clear that a comment may not be treated differently due to the method of delivery. The law should also be changed to a) eliminate reference to participation methods or b) add social media where other methods are required.

It is difficult to understand why the law should dictate specific participation methods. Ideally, the law would be method agnostic. Instead of embedding method preferences, policies
would be strengthened by providing criteria for transparently assessing input regardless of method used. But if inclusion of methods is necessary, laws and regulations should be amended to also include the requirement of social media. Amending laws and regulations to clarify the use of social media would eliminate agency confusion over how to handle and reduce liability that emanates from a legal gray area.

U.S. federal, state and local laws and ordinances should be amended by legislatures and councils to balance the policy effects of public comments via social media. Policy bodies that promulgate regulations should do the same. Model statutes and regulations could be developed and promoted by academics, think tanks, study commissions, and citizen activists to advance the issue and facilitate legislative and regulatory action.

**Recommendation #5:** For improved organizational awareness, agencies should develop new models of internal information sharing without media source bias.

While the structure exists for sharing news, there is too much subjectivity when it comes to sharing information from social media sources. Organizational standards are needed to reduce the prominence of the informal risk assessment. The practice of compiling daily news clips should be terminated or revised to include social media “clips.” Agencies should adopt software to aid in media clips cultivation and sharing. There are limited off the shelf products available to meet this need, so software that matches agency requirements may need to be developed. Those in command of these responsibilities and systems require more guidance and training. Communications practitioners should be trained to scan, assess, and share social media posts and educated in high risk/high care organizational practices. If organizations improve models of internal information sharing, senior leaders will be more aware of what is being said about them. Organizations will be more prepared for high risk reports that surface on social media.

**Recommendation #6:** Senior public leaders must adopt social media and engage with
stakeholders through these platforms.

If senior leaders adopt social media and engage with stakeholders on these platforms the public sector is likely to experience a shift in the attention and care paid to social media, as agencies adopt the personalities of those in charge. Senior leaders who engage with stakeholders on social media will receive more first-hand information from it and be more in touch with users, including youth and racial/ethnic and income minorities. This will result in senior leaders having more concern for their reputations on social media, more belief in its organizational importance, and more involvement in social media preparation. Overall, organizations will be less vulnerable with senior leaders more aware of social media.

Senior leaders should be trained by communications staff or contractors to adopt and engage with stakeholders on social media platforms. For legitimacy, if staff ghostwrites content and posts to senior leaders’ social media accounts, such posts should be signed-off to make it clear to viewers who is behind it. Social media skills and training should be incorporated into senior leaders’ job descriptions.

**Recommendation #7:** Boards and those with appointment power must acquire chief executives with demonstrated social media skills.

Boards and those with appointment power should embed the need for social media skills in chief executives’ job descriptions. In their search for candidates, they should examine senior executives’ social media accounts for demonstrated skills and incorporate into interview questions.

**Recommendation #8:** Organizations should restructure their communications functions and elevate responsibility for social media in order to eliminate medium bias.

Organizations must restructure their communications function and cast aside the legacy, pre-social media hierarchies in order to eliminate medium bias. Senior communications
practitioners must have social media skills, not merely news media skills. Social media cannot be treated as an organizational add-on, but rather an essential and central function of organizational communications. Traditional directors of media relations should be replaced with senior communicators who possess the same level of concern and skill for social media as they do for traditional media. In order to be in synch with management, the senior communications practitioner with greatest level of access to senior leadership should maintain social media responsibilities.

Recommendation #9: Professional communicators should become organizational experts in high risk/high care approaches to social media.

There is no policy prescription for token levels of senior level discussion, and organizational responsiveness and change to information as stimuli. However, increasing the organizational perception of social media as high risk will alter organizational behavior. The broader communications field must adapt and recognize that mobile technologies and social media have put the ‘agenda’ in the hands of today’s citizens/stakeholders. Industry and professional associations must develop a body of work on these topics: scanning, assessing, and sharing (SAS), models of internal information sharing, high risk/high care approaches to social media, and social media legitimacy. Industry and professional associations must provide concrete standards and training for communications practitioners. In the absence of such capacity building, organizational communicators can feel like they are on an island. One interviewee bemoaned the lack of guidance: “I’m one person. And because there’s not a culture of social media usage here on campus, it’s really just fallen into my hands to do with it what I will.” With these new skills, trained communications practitioners should be ambassadors in their organizations for social media, especially with senior leaders. They should lead the effort to change internal practices and beliefs toward social media legitimacy.
Conclusion

This research fills an existing void in knowledge because it combines two fields that have traditionally been kept somewhat distinct: the study of public participation, a traditional policy perspective, and social media, an emerging communications field. This void also exists in understanding the vital role of the senior communications practitioner who scans, assesses and shares information which impacts public decision making. In this digital age, where information is currency, the vital role of the senior communications practitioner warrants additional research attention.

This study invites further research in a number of areas. One area of potential research is citizen expectations for their use of social media. What do citizens believe happens with their comments when they submit them via social media? Such a study would provide further understanding of the potential gaps in how government has maximized participation through social media. Another potential area of study is what the law actually says in regards to social media in public participation processes. Study participants said that the law does not favor comments on social media. Is this true? Are the participants correct, or are they uninformed? A content analysis of the laws affecting the treatment of social media in public participation would give legislators and regulators a clearer picture of method bias. This would make the development of model legislation easier.

To better explain why information from social media is discounted, further study could explore how senior communicators define “formality” and “credibility.” These are terms that resonated with the participants in this study. But one participant may mean something very different when citing social media as lacking credibility than another participant. Such a study would provide important insights that could lead to efforts to improve the perception of
credibility of information on social media.

Additional research could test the relationship of many of the variables used in this study to examine the influence of one on the other. For example, how strong is the relationship between organizational practices and beliefs? What impact does senior leader communications habits have on organizational practices and beliefs? What is the relationship between organizational risk (and its indicators) and organizational care (and its indicators)? Do organizations that perceive social media as high risk also give social media a level of care, and vice versa? To the extent giving social media equal weight to traditional media is an indicator of an ideal organization that embraces social media legitimacy, then what are the other attributes of these organizations? In general, because social media is highly dynamic, regular studies should be conducted to determine whether agency treatment of citizen participation via social media has changed quickly.

This study found that information from social media is discounted by public organizations when compared to information from traditional sources, whether public meetings or news sources. Public participation via social media lacks legitimacy, and there is solid evidence of social media tokenism in many organizations. Citizens are currently not well served by providing substantive comments about public issues and decisions via social media. Public policies should be changed to eliminate bias against social media. And organizations should adapt in order to maximize the opportunities that social media presents to improve government decision making.

The initial discounting of information from social media is followed by a series of low impact internal organizational practices, buoyed by particular organizational beliefs, which provides a false view of the value of the information or risk posed by it. Many of the
organizations studied displayed a low level of organizational care toward social media and perceived social media as low risk. This leaves organizations vulnerable. Over the years, public organizations have been arming themselves through practices and structures to handle the big news story, but this leaves them unable to react to a firestorm on social media. Organizations must cast aside historical approaches and undergo a transformation to prepare them for the organizational risks of today and tomorrow.

Social media and mobile technologies are a game changer for the American public. Their pervasiveness is driving profound societal shifts in, at minimum, the way people communicate and engage with issues and organizations. Social media reduces the barriers to citizen input, and, in many instances, contains superior information than is found elsewhere. Government must harness this potential to capture readily available citizen input to improve decision making, increase social media legitimacy, and expand democracy.
References


International Association for Public Participation. (2014). IAP2's Public Participation Spectrum: IAP2 International Federation


Notification of IRB Action

Date: December 18 2014  IRB #: CPS14-12-08

Principal Investigator(s): Neenah Estrella-Luna
James Toscano

Department: Doctor of Law and Policy
College of Professional Studies

Address: 20 Belvidere
Northeastern University

Title of Project: Social Media as Legitimate Citizen Participation

Participating Sites: Permission received from Transit Intelligence

Informed Consent: One (1) unsigned consent

As per CFR 45 46.117(c)(2) signed consent is being waived as the research presents no more than minimal risk of harm to subjects and involves no procedures for which written consent is normally required.

DHHS Review Category: Expedited #6, #7
Monitoring Interval: 12 months

Approval Expiration Date: DECEMBER 17 2015

Investigator’s Responsibilities:
1. Informed consent form bearing the IRB approval stamp must be used when recruiting participants into the study.
2. The investigator must notify IRB immediately of unexpected adverse reactions, or new information that may alter our perception of the benefit-risk ratio.
3. Study procedures and files are subject to audit any time.
4. Any modifications of the protocol or the informed consent as the study progresses must be reviewed and approved by this committee prior to being instituted.
5. Continuing Review Approval for the proposal should be requested at least one month prior to the expiration date above.
6. This approval applies to the protection of human subjects only. It does not apply to any other university approvals that may be necessary.

C. Randall Colvin, Ph.D., Chair
Northeastern University Institutional Review Board

Nan C. Regina, Director
Human Subject Research Protection

Northeastern University FWA #4630
Dear Senior Communications Professional:

*Having trouble breaking through to senior leadership about social media?*

My name is James Toscano. I’m conducting a doctoral study through Northeastern University that addresses such obstacles.

I’ve contacted you because of your expertise on these issues. I seek your help in completing a survey so that our industry can understand how to maximize social media participation to improve our organizations.

Please take the next 10 minutes to **complete the survey**. Once compiled, I’m pleased to share the survey results with you for your benefit.

No personally identifiable information will be included in my reports. Your identity and organization will be anonymous.

Please **complete the survey** by [insert date]. If you have any questions, do not hesitate to contact me at toscano.ja@husky.neu.edu.

Best Regards,
James Toscano

James P. Toscano  
Candidate for Doctor of Law and Policy  
Northeastern University  
LinkedIn: [http://www.linkedin.com/pub/james-toscano/8/43b/118](http://www.linkedin.com/pub/james-toscano/8/43b/118)  
Twitter: @jamestoscano
Dear Senior Communications Professional:

*Having trouble breaking through to senior leadership about social media?*

My name is James Toscano, a former communications executive in the transit industry. I’m conducting a doctoral study through Northeastern University that addresses such obstacles.

I’ve contacted you because of your expertise on these issues. I seek your help in completing a survey so that our industry can understand how to maximize social media participation to improve our organizations.

Please take the next 10 minutes to **complete the survey**. Once compiled, I’m pleased to share the survey results with you for your benefit.

No personally identifiable information will be included in my reports. Your identity and organization will be anonymous.

Please **complete the survey** by [insert date]. If you have any questions, do not hesitate to contact me at toscano.ja@husky.neu.edu.

Best Regards,

James Toscano

James P. Toscano
Candidate for Doctor of Law and Policy
Northeastern University
LinkedIn: [http://www.linkedin.com/pub/james-toscano/8/43b/118](http://www.linkedin.com/pub/james-toscano/8/43b/118)
Twitter: @jamestoscano
Dear [insert first name],

My name is James Toscano. I write because you are a leader in the field of public affairs and communications in your industry.

I am a candidate for the Doctor of Law and Policy at Northeastern University. I would like to interview you because of your position within your organization as a senior communications practitioner and understanding of how information is treated and shapes organizational practices.

Your participation in the interview will be confidential. In other words, written reports regarding the research will not contain any identifying information about you or the organization you represent.

Your participation is entirely voluntary.

I expect the interview will last 45 minutes by phone. I will audio-record the interview for convenience.

Please let me know if you are willing to participate by replying to this email.

Best Regards,
James Toscano

James P. Toscano
Candidate for Doctor of Law and Policy
Northeastern University
LinkedIn: http://www.linkedin.com/pub/james-toscano/8/43b/118
Twitter: @jamestoscano
Dear [insert first name],

Thank you for agreeing to participate in an interview for my research project on [insert day/month], 2015 at [insert time].

I expect the interview will last 45 minutes by phone. I will audio-record the interview for convenience.

Your participation in the interview will be confidential. In other words, written reports regarding the research will not contain any identifying information about you or the organization you represent. There is a consent form attached to this communication that informs you of your rights as an interview participant.

Please let me know if you have any questions or concerns. Otherwise, I look forward to speaking with you on [insert date and time].

Best Regards,
James Toscano

James P. Toscano
Candidate for Doctor of Law and Policy
Northeastern University
LinkedIn: http://www.linkedin.com/pub/james-toscano/8/43b/118
Twitter: @jamestoscano
UNSIGNED CONSENT DOCUMENT

Northeastern University, Department of: College of Professional Studies
Name of Investigator(s): Principal Investigator: Dr. Neenah Estrella-Luna, Student Researcher: James Toscano
Title of Project: Social Media as Legitimate Citizen Participation

Request to Participate in Research

We would like to invite you to take part in a research project. The purpose of this research is to understand how to maximize social media opportunities to improve organizations.

You must be at least 18 years old to be in this research project.

The study will take place by telephone and will last one session for about 45 minutes. If you decide to take part in this study, we will ask you to answer a series of questions about your organizational practices related to social media.

The possible risks or discomforts of the study are minimal. You may feel a little uncomfortable answering sensitive interview questions.

There are no direct benefits to you from participating in this study. However, your responses may help us learn more about how to maximize social media opportunities for organizations.

Your part in this study will be handled in a confidential manner. Only the researchers will know that you participated in this study. Any reports or publications based on this research will use only group data and will not identify you or any individual as being of this project.

The decision to participate in this research project is up to you. You do not have to participate and you can refuse to answer any question. Even if you begin the study, you may withdraw at any time.

You will not be paid for your participation in this study.

If you have any questions about this study, please feel free to contact James Toscano at toscano.ja@husky.neu.edu or (757)592-2335, the person mainly responsible for the research. You can also contact Dr. Neenah Estrella-Luna at n.estrellaluna@neu.edu or (617)373-6472, the Principal Investigator.

If you have any questions about your rights in this research, you may contact Nan C. Regina, Director, Human Subject Research Protection, 960 Renaissance Park, Northeastern University, Boston, MA 02115. Tel: 617.373.4588, Email: n.regina@neu.edu. You may call anonymously if you wish.

You may keep this form for yourself.

Thank you.

Dr. Neenah Estrella-Luna and James Toscano
SOCIAL MEDIA AS LEGITIMATE CITIZEN PARTICIPATION
FINAL INTERVIEW GUIDE

Introduction

Thank you for your participation. I don’t expect this interview to last more than 45 minutes. First, I’m going to ask you about your role within your organization and a little about organizational structure, then then I’m going to ask you about how your organization deals with information it receives through social media as well as traditional news media.

Roles and Responsibilities

1. How would you describe the role you play when you encounter a critical piece of information in the news media or on social media pertaining to your organization?

2. How do you decide what information to share with others, and who do you share it with?

3. Who in the organization is responsible for direct relations with traditional news outlets?
   a. What is their reporting relationship? Why this structure?

4. Who in the organization is responsible for direct relations with social media users?
   a. What is their reporting relationship? Why this structure?

Public Participation:

5. Are you familiar with your organization’s public involvement/participation programs?

   If YES, go to #6; if NO skip to 15

6. Please describe these programs.

7. Do you know of any laws or polices that govern this?

   If NEPA, ask #11; if not, skip #11

8. How is social media, if at all, incorporated into these programs?

9. Do you feel confident about how your organization is meeting legal requirements relative to social media comments? Why?

10. Are comments posted on social media given the same weight as comments delivered in a public meeting/hearing? Why?

11. Are comments received on social media as part of the NEPA process included in the project record? Why or why not?
12. What should social media users expect from their participation with organizations via social media? Why?

13. What obstacles exist to using public comments from social media?

14. Does social media pose the potential to improve public participation? If so, how?

SKIP to #21

15. Does your organization ever hold public meetings or hearings when the public gets a chance to comment on projects or proposals?

If YES, go to #16; if NO, skip to #21

16. What happens to these comments?

17. What if the same comment was made by a stakeholder on your social media? Would the comment have the same weight? Why or why not?

18. What should social media users expect from their participation with organizations via social media? Why?

19. What obstacles exist to using public comments from social media?

20. Does social media pose the potential to improve public comment opportunities? If so, how?

**Information Care**

21. Please describe the circumstances under which you would share news clips with senior leaders in your organization. How do you decide what to include? And what do you hope to achieve with their distribution?

22. Can you tell me about a time when something reported in the newspaper or on TV triggered senior leaders in your organization to change a policy or practice or issue an organized response? How was that response delivered, and who was involved?

23. Please describe the circumstances under which your organization would respond to a negative story, opinion column or letter to the editor concerning your organization published in the newspaper or appeared on television? How would your organization respond, and who would be involved?

24. Please describe the circumstances under which you would share social media clips with senior leaders in your organization. How do you decide what to include? And what do you hope to achieve with their distribution?
25. Can you tell me about a time when something posted on social media triggered senior leaders in your organization to change a policy or practice or issue an organized response? How was that response delivered, and who was involved?

26. Please describe the circumstances under which your organization would respond to a negative social media post concerning your organization? How would your organization respond, and who would be involved?

27. In some organizations, information from social media is treated very differently than information from traditional news sources. What about in your organization? Why is this?

28. To what extent does senior leader adoption of social media affect how your organization treats information on social media? Is there medium bias? Why?

29. Are there unique obstacles or opportunities for organizations to engage with youth and minorities who are highly connected through social media?

30. As the senior communicator, do you have a different view of the value of social media than other senior leaders in your organization, and how do you overcome that?
* 1. UNSIGNED CONSENT DOCUMENT FOR WEB-BASED ONLINE SURVEYS

Northeastern University, Department of: College of Professional Studies
Name of Investigator(s): Principal Investigator: Dr. Neenah Estrella-Luna, Student Researcher: James Toscano
Title of Project: Social Media as Legitimate Citizen Participation

Request to Participate in Research
We would like to invite you to participate in a web-based online survey. The survey is part of a research study the purpose of which is to understand how to maximize social media opportunities to improve organizations. This survey should take about 10 minutes to complete.

We are asking you to participate in this study because you are a senior communications practitioner in your organization. You must be at least 18 years old to take this survey.

The decision to participate in this research project is voluntary. You do not have to participate. Even if you begin the web-based online survey, you can stop at any time.

The possible risks or discomforts of the study are minimal. You may feel a little uncomfortable answering sensitive survey questions.

There are no direct benefits to you from participating in this study. However, your responses may help us learn more about how to maximize social media opportunities for organizations.

You will not be paid for your participation in this study.

Your part in this study will be handled in a confidential manner. Any reports or publications based on this research will use only group data and will not identify you or any individual as being affiliated with this project.

If you have any questions regarding electronic privacy, please feel free to contact Mark Nardone, NU’s Director of Information Security via phone at 617-373-7901, or via email at privacy@neu.edu.
If you have any questions about this study, please feel free to contact James Toscano at toscano.ja@husky.neu.edu or (757)592-2335, the person mainly responsible for the research. You can also contact Dr. Neenah Estrella-Luna at n.estrellaluna@neu.edu or (617)373-6472, the Principal Investigator.

If you have any questions regarding your rights as a research participant, please contact Nan C. Regina, Director, Human Subject Research Protection, 960 Renaissance Park, Northeastern University, Boston, MA 02115. Tel: 617.373.4588, Email: n.regina@neu.edu. You may call anonymously if you wish.

By selecting “I consent” below, you are consenting to the survey. Then click "Next" to begin the survey.

Thank you for your time.

Dr. Neenah Estrella-Luna and James Toscano

☐ I consent
Social Media Legitimacy

*2. In my organization (please select all that apply):

☐ I am responsible for determining which news is relevant to my organization and sharing it with others
☐ I am responsible for delivering a response to the media
☐ I am responsible for seeking the facts within my organization about a news story or potential story
☐ I am responsible for drafting editorials
☐ I am responsible for drafting press releases
☐ I am responsible for monitoring social media and sharing internally
☐ I am familiar with our public outreach activities and processes
☐ I am responsible for ghostwriting my president's social media account
☐ I am responsible for the use of social media for legally-required public participation programs
☐ I am responsible for preparing and distributing reports on social media analytics
☐ I set the tone for what others think
☐ I make people in my organization aware of what is being said about them

*3. Do you delegate responsibility for regular social media engagement with stakeholders to a subordinate employee?

☐ Yes
☐ No

*4. Does the employee in your organization who routinely interacts with news reporters rank higher in the organization than the employee who routinely interacts with stakeholders on social media?

☐ Yes
☐ No

*5. Which best describes the technology adoption of senior leadership within your organization?

☐ Most or all senior leaders in my organization use social media
☐ Few or no senior leaders in my organization use social media

*6. Which best describes senior leadership within your organization?

☐ Most or all senior leaders in my organization engage with our stakeholders on social media
☐ Few or no senior leaders in my organization engage with our stakeholders on social media
**7. Does your organization hold public meetings or hearings for citizens?**

- Yes
- No

---

**8. In my organization a comment received on social media receives ____ a comment made at a public meeting.**

- more weight than
- less weight than
- the same weight as

---

**9. In general, a comment received on social media receives less weight than a comment at a public meeting because ____ (please select all that apply).**

- social media is not a formal channel of citizen participation
- the law favors public meetings
- social media comments are out of the view of senior leaders in my organization
- it is not easily transferable from its social networking site
- it is less credible
- mostly younger people are on social media
- of concerns about user identity

Other (please specify)

---

**10. True of False: My organization uses social media to channel citizens to more "formal" methods of citizen participation.**

- True
- False
11. Has your organization used social media as part of NEPA-required (National Environmental Protection Act) public involvement for the development and construction of major projects?

- Yes
- No

12. When I receive a comment on social media regarding a project in the NEPA process _____ in the official project record.

- the comment is documented
- the comment is not documented
- I’m not sure whether it is documented

13. My organization does not include comments from social media in the official project record because _____ (please select all that apply).

- the comments were not offered on a formal channel of participation
- the law does not require it
- the comments are not easily transferred from their social networking site
- there is a lack of guidance that inclusion is necessary
- the comments are less credible
- of concerns about user identity

Other (please specify)

Traditional News Practices
Social Media Legitimacy

*14. When I encounter information concerning my organization carried by traditional news outlets:

- I always pass it along to senior leaders in my organization
- I frequently pass it along to senior leaders in my organization
- I rarely pass it along to senior leaders in my organization
- I never pass it along to senior leaders in my organization

*15. I share ____ with senior leaders.

- all news stories concerning my organization
- only positive stories concerning my organization
- only negative stories concerning my organization
- only news stories I deem high risk for my organization

Other (please specify)

*16. News reports concerning my organization are distributed to senior leaders in my organization:

- When it happens
- Daily
- Weekly
- Monthly
- Never

*17. An item in the news concerning my organization:

- Always causes discussion between senior leaders
- Frequently causes discussion between senior leaders
- Rarely causes discussion between senior leaders
- Never causes discussion between senior leaders
Social Media Legitimacy

*18. An item in the news concerning my organization:
- Always triggers an organizational response or change
- Frequently triggers an organizational response or change
- Rarely triggers an organizational response or change
- Never triggers an organizational response or change

*19. Negative news stories reported in the press concerning my organization:
- Always trigger an organizational response or change
- Frequently trigger an organizational response or change
- Rarely trigger an organizational response or change
- Never trigger an organizational response or change

*20. Which statement best describes who in your organization would be involved in preparing an editorial response to a news report?
- The president/senior leaders would be involved
- No senior leadership would be involved

*21. Which statement best describes who in your organization would be involved in preparing a press release?
- The president/senior leaders would be involved
- No senior leadership would be involved

Social Media Practices

*22. When I encounter information concerning my organization posted on social media:
- I always pass it along to senior leaders in my organization
- I frequently pass it along to senior leaders in my organization
- I rarely pass it along to senior leaders in my organization
- I never pass it along to senior leaders in my organization
23. I share ____ with senior leaders.

- all social media posts concerning my organization
- only complimentary posts concerning my organization
- only negative posts concerning my organization
- only social media posts I deem high risk

Other (please specify)

24. Social media posts concerning my organization are distributed to senior leaders in my organization:

- When it happens
- Daily
- Weekly
- Monthly
- Never

25. An item posted on social media concerning my organization:

- Always causes discussion between senior leaders
- Frequently causes discussion between senior leaders
- Rarely causes discussion between senior leaders
- Never causes discussion between senior leaders

26. An item on social media concerning my organization:

- Always triggers an organizational response or change
- Frequently triggers an organizational response or change
- Rarely triggers an organizational response or change
- Never triggers an organizational response or change
**Social Media Legitimacy**

*27. My organization responds to:*
- All posts on social media
- Only positive posts on social media
- Only negative posts on social media
- Only posts that have the possibility of a substantive response

*28. Negative social media posts concerning my organization:*
- Always trigger an organizational response or change
- Frequently trigger an organizational response or change
- Rarely trigger an organizational response or change
- Never trigger an organizational response or change

*29. Which statement best describes who in your organization would be involved in preparing a response to a social media post?*
- The president/senior leaders would be involved
- No senior leadership would be involved

**Perceptions & Influences**

*30. Senior leaders in my organization get most of their first-hand information from:*
- Traditional news sources
- Social media sources
- A mix of traditional news and social media sources

*31. Senior leaders are _____ with my organization’s portrayal in the news.*
- very concerned
- somewhat concerned
- hardly concerned
- not concerned
Social Media Legitimacy

*32. Senior leaders are _____ with my organization’s portrayal in social media.

- very concerned
- somewhat concerned
- hardly concerned
- not concerned

*33. Senior leaders view my organization’s engagement on social media as:

- Very important
- Not very important

*34. True or False: Senior leaders who use social media are more likely to believe it is important.

- True
- False

*35. Senior leaders in my organization are _____ with younger stakeholders.

- in touch
- out of touch

*36. The impression left by a news story is ____ compared to a social media post.

- more lasting
- less lasting

*37. True or False: I am more likely to respond to a tweet about my organization if the person who tweeted has a large following.

- True
- False

*38. True or False: An item in the news about my organization will reach more people than an item posted on social media.

- True
- False

*39. True of False: A social media post concerning my organization is likely to go viral.

- True
- False
**Social Media Legitimacy**

*40. Is it more damaging to have a negative piece of information about your organization on social media or in traditional news?*

- [ ] Social media
- [ ] Traditional news
- [ ] No difference

**Housekeeping and Demographics**

*41. Which of the following categories describe your organization type?*

- [ ] Higher education
- [ ] Public transportation - United States
- [ ] Public transportation - Canada
- [ ] Local government
- [ ] Law enforcement
- [ ] State agency
- [ ] Federal agency
- [ ] Other (please specify)

*42. Which of the following categories best describes your college or university?*

- [ ] U.S. public
- [ ] U.S. private
- [ ] Non-U.S. public
- [ ] Non-U.S. private

*43. Please provide your job title:*


44. If you are willing to participate in a 45-minute phone interview to discuss this subject in more detail, please provide your email address below. Your contact information will be kept confidential.
Social Media Legitimacy

45. If you would like to receive a summary of the results of this survey, please provide your
email address below. Your contact information will be kept confidential.

46. If you would like to receive future surveys on the topic of social media legitimacy,
please provide your email address below. Your contact information will be kept
confidential.

47. If you know of/are involved in an organization that would benefit from this research or
a presentation on how to maximize social media opportunities, please provide that
information below.