

PIERCE TRANSIT EXTERNAL SOCIAL MEDIA USE POLICY

Policy #: 2.25

Effective Date: October 10, 2026

Policy Owner: Communications Division

Policy Contact: Chief Communications Officer or General Counsel

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1. Purpose

Pierce Transit recognizes that social media provides valuable tools for communicating with the public, delivering service information, promoting ridership and safety, engaging the community, and recruiting employees. This policy establishes requirements governing the creation, administration, and moderation of official Pierce Transit social media. These include the handling of confidential or security-sensitive information, safeguarding the Agency's reputation, ensuring compliance with public records obligations, and potential under the First Amendment considerations.

This Policy establishes rules and guidelines governing External Use—the creation, administration, and moderation of official Pierce Transit social media accounts and content published on the Agency's behalf. As a public agency, Pierce Transit administers this Policy consistent with the First Amendment, the Washington Public Records Act, applicable records-retention requirements, other applicable state and federal law, and the lawful rights of the public.

2. Scope

This Policy applies to all Pierce Transit employees, officers, Board members, appointed and elected officials acting on behalf of the Agency, agents, interns, and volunteers (collectively, "Personnel") who are authorized to administer, post to, or moderate official agency social media platforms.

This Policy supplements and does not replace other Agency policies and applicable collective bargaining agreements.

3. Policy Statement

PART A — EXTERNAL USE: OFFICIAL PIERCE TRANSIT SOCIAL MEDIA ACCOUNTS

3.1. Authorization and Account Ownership

- **Agency approval required:** No Official account may be created, launched, rebranded, or discontinued without the prior written approval of the Chief Communications Officer (or designee). Personnel may not establish a social media account, page, or profile that purports to represent Pierce Transit without this approval.
- **Agency ownership:** Pierce Transit owns all Official accounts and all associated login credentials, passwords, administrative rights, content, followers, contacts, and analytics,

regardless of which individual created or operates the account. All such credentials and content remain the property of Pierce Transit during and after any individual's employment or engagement, and must be surrendered to the Agency upon request or upon separation.

- **Register and secure accounts:** The Digital Content & Outreach Coordinator shall maintain a current inventory of all Official accounts, the Administrators assigned to each, and the credentials for each. Official accounts must be secured using Agency-controlled email addresses, strong passwords, multi-factor authentication where available, and other reasonable safeguards. Administrative access must be promptly revoked when an individual changes roles or separates from the Agency.

3.2. Administration and Content Approval

- **Designated Administrators:** Only designated Administrators may post content to or moderate an Official account. Administrators must complete any training required by the Chief Communications Officer before being granted access.
- **Content standards:** Content on Official accounts must:
 - Be accurate, professional, and consistent with Pierce Transit's mission, brand, and voice;
 - Serve a legitimate agency purpose, such as service alerts, safety information, public notices, community engagement, recruitment, or program promotion;
 - Comply with all applicable Agency policies, including those governing confidential and security-sensitive information, discrimination and harassment, and ethics; and
 - Comply with copyright, trademark, and platform terms of use.
- **Approval and routing:** Content outside routine, pre-approved categories (such as standard service alerts) must be reviewed and approved in accordance with procedures established by the Digital Content & Outreach Coordinator. Media or press inquiries received through social media must be routed to the Communications Division and must not be answered by Administrators without authorization.
- **Nonpartisanship and no endorsements:** Official accounts must not be used to support or oppose any candidate for office, political party, or ballot measure, or to engage in other partisan political activity, consistent with Washington law governing use of public facilities in election campaigns. Official accounts must not endorse commercial products, services, or private organizations except as part of an authorized Agency program or sponsorship.

3.3. Moderation and User Blocking (First Amendment Compliance)

Because an Official account that allows public comment may be treated as a government forum, moderation decisions and user status restrictions are subject to First Amendment guidelines.

- **No viewpoint discrimination:** Administrators must not delete, hide, or restrict comments, or block or ban users, simply because the comment or user is critical of, disagrees with, or expresses an unpopular opinion about Pierce Transit, its officials, or its services. Comments and users may not be restricted based solely on the viewpoint they express.
- **Permissible grounds for removal and blocking:** If Pierce Transit chooses to moderate its forums, it must do so only under a published, content-neutral policy applied consistently to all users. The Chief Communications Officer and Digital Content & Outreach Coordinator are **authorized to delete comments and block or ban users** who repeatedly violate these narrowly defined, viewpoint-neutral categories:
 - Obscene, profane, vulgar, or sexually explicit content and language;
 - Threats of violence, or content that incites imminent unlawful conduct;
 - Unlawful discrimination, harassment, or content attacking protected classes;
 - Personal private information (e.g., another person's phone number, address, medical, or financial information);
 - Spam, commercial solicitation, or content entirely unrelated to the platform that is excluded under a consistently enforced rule;
 - Content that violates intellectual property rights; and
 - Comments that disclose security-sensitive or confidential Agency information.
- **Process for blocking users:** Administrators must not block or ban users from an Official account except in accordance with the content-neutral standards in Section 3.3. Any blocking action must be processed under procedures established by the Chief Communications Officer and the General Counsel.
- **Publish the policy and preserve records:** A plain-language comment and moderation policy must be posted or linked clearly on each Official account. **Before any comment is hidden/deleted, or any user is blocked/banned**, the Administrator must preserve a copy (via screenshot or export) of the violation and record the specific content-neutral basis for the action, as these actions remain subject to public records laws.
- **Consistency:** Rules must be enforced uniformly. Selectively enforcing a rule—such as blocking a user for vulgar language on a critical post while ignoring vulgar language on a positive post—is considered a violation of this policy .

3.4. Accessibility

Beginning April 26, 2028, public-facing content on Official accounts (web content and mobile apps) must be accessible to persons with disabilities consistent with the requirements for web and mobile accessibility set forth in 28 C.F.R. Part 35, Subpart H, including the criteria and conformance requirements specified within the Web Content Accessibility Guidelines (WCAG 2.1 AA).

Administrators must add alternative text to images, provide captions for video, provide audio descriptions where visuals convey meaning, use accessible document formats, and avoid conveying information through color or images alone.

3.5. Responding to the Public

- **Service tracking:** Administrators should monitor Official accounts regularly and respond to legitimate service questions and complaints in a timely, professional, and consistent manner, directing users to official service channels where appropriate.
- **Emergency reporting:** Social media must not be used as a channel for emergencies or safety-critical reporting; Administrators should immediately direct such matters to the appropriate emergency or Agency channels.
- **Legal notices:** Complaints, claims, threats, or legal notices received through social media must be routed immediately to the appropriate department (e.g., Customer Service, Risk Management, or Legal) and must not be substantively addressed by Administrators without authorization.

PART B — PUBLIC RECORDS, RETENTION, AND RECORDKEEPING

3.6. Social Media as Public Records

- **General scope:** Content on Pierce Transit's Official accounts—including posts, images, video, comments (including comments later hidden, deleted, or associated with blocked users), direct messages, and account metadata—constitutes public records subject to disclosure under the Washington Public Records Act (RCW 42.56).
- **Account compliance:** Social media activity that relates to the conduct of government or the performance of an Agency function, that the job requires, that the Agency directs, or that furthers the Agency's interests, must be preserved in accordance with required records retention schedules and policies.

3.7. Retention

- **Retention schedules:** Social media content that qualifies as a public record must be retained in accordance with the applicable Washington State records-retention schedules issued by the

Secretary of State and the Agency's records-retention policy. Personnel and Administrators must not delete records before the end of the applicable retention period.

- **Archiving workflows:** The Digital Content & Outreach Coordinator, in coordination with the Agency's Public Records Officer, shall implement a method to capture and archive content on Official accounts (including comments and deleted content) sufficient to meet retention and disclosure obligations.
- **Public requests:** Public records requests for social media content must be referred promptly to the Agency's Public Records Officer.

4. Definitions

Social Media – Internet-based platforms and tools that enable users to create, post, share, or exchange information, opinions, images, audio, or video, including but not limited to Facebook, X (formerly Twitter), Instagram, LinkedIn, YouTube, TikTok, Nextdoor, Reddit, blogs, wikis, discussion forums, and comment sections.

Official Account – Any social media account, page, channel, or profile created, maintained, or used to communicate on behalf of Pierce Transit or any of its divisions, programs, or facilities.

Content – Any post, comment, reply, message, image, video, link, reaction, or other material published on or through a social media platform.

Administrator – Personnel authorized by the Chief Communications Officer (or designee) to create, post to, moderate, or manage an Official account.

5. Responsibilities

Public Users:

- Violation of the platform standards listed in Section 3.3 by a member of the public may result in immediate moderation actions, including hiding or deleting the non-compliant content, or temporarily or permanently blocking the user from the official account, in alignment with First Amendment public forum guidelines.

Account Administrators:

- Authorized Personnel who manage official channels must strictly adhere to the moderation protocols and brand standards outlined in this Policy. Failure to follow these guidelines, or engaging in unauthorized moderation or viewpoint discrimination, will result in the immediate removal of administrative access and may be subject to internal agency review.



POLICY

Policy History

Revision Date	Previous Version

See Also

Procedure #	Effective Date