EVALUATION OF THE EEOC’S SOCIAL MEDIA PROGRAM

Prepared for the EEOC Office of the Inspector General

OIG REPORT NUMBER 2020-001-EOIG

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Executive Summary

To ensure the U.S. Equal Employment Opportunity Commission’s (EEOC) social media program is effective at helping EEOC achieve its objectives—to 1) promote EEOC’s education and outreach activities, 2) encourage greater use of the EEOC website, and 3) increase public access to information about rights and responsibilities under the laws EEOC enforces—the EEOC Office of the Inspector General (OIG) hired Hager Sharp to evaluate the program.

To evaluate EEOC’s social media program, Hager Sharp conducted in-depth interviews (IDIs) with staff, analyzed qualitative and quantitative website and social media metrics, and reviewed extensive documentation around social media guidance and policies and social media performance review. These activities allowed us to develop findings and conclusions in four key areas—strategy and process, social media content and tactics, planning, and measurement. Exhibit 1 provides a summary of the findings and conclusions in each area.

**Exhibit 1. Summary of Findings and Conclusions**

<table>
<thead>
<tr>
<th>TOPIC</th>
<th>FINDINGS</th>
<th>CONCLUSIONS</th>
</tr>
</thead>
</table>
| **STRATEGY AND PROCESS**   | • The EEOC has an extensive social media program with at least 25 channels. Field offices manage 15 of these channels.  
• EEOC has approximately 17 individuals serving as social media managers for EEOC.  
• The social media management process differs from office to office—and even channel to channel—as staff determine how best to create content within their other responsibilities and with limited knowledge and budget. | • The decentralized nature of the social media program allows EEOC to have a widespread presence across social channels and provides EEOC the ability to reach a larger audience and tailor messaging for specific audiences.  
• However, it also creates substantial challenges, which result in EEOC social media channels producing a high volume of social media content of mixed quality. This ultimately leads to fewer engagements and impressions and reduces the program’s overall impact. |
| **CONTENT AND TACTICS**    | • The EEOC main handles (Facebook, LinkedIn, and @USEEOC Twitter) were the most successful at core social media metrics such as impressions, engagement rate, and click-through rate (CTR).  
• Content featuring information around discrimination performed best on EEOC’s social media channels, as did content featuring link previews and text-heavy images and posts focused on reaching employers.  
• Social media as a whole drove limited traffic to the EEOC website. Popular website content for social media visitors varied depending on the timeframe, as well as the social media channel of origin. | The EEOC is not always using the channels, topics, and tactics associated with better outcomes—or its strategic objectives—most frequently. |
### PLANNING
- The EEOC has limited documentation to support social media managers.
- EEOC has three guidance documents available to help staff managing social media: a social media handbook and two “how-to” documents and guidance created for field offices.
  - However, staff noted that they rarely, if at all, refer to the documents.
- The EEOC provided Hager Sharp with one social media campaign plan to review, which contained content (but no strategy) for the campaign.
- The EEOC’s currently available handbook does not reflect the most up-to-date best practices for social media. It is also not comprehensive enough for those who are non-experts in social media, like EEOC staff.
- The EEOC’s limited planning for social media activities misses an opportunity to create experiences on social media that have higher-level engagement.

### MEASUREMENT
- The EEOC’s reporting of social media outcomes included some website and social media data for OCLA social media channels for entire fiscal years.
- The reports did not include OFO or field office outcomes; did not address monthly or other fluctuations; and did not set goals that could drive future outreach efforts.
- The cadence and structure of social media reporting limited EEOC’s opportunities to uncover helpful data that could improve its social media program.
- The limited reporting prevents EEOC from having the opportunity to adjust and enhance strategy and content output periodically, based on performance, to ensure that the EEOC meets or exceeds its program objectives and goals.

Throughout the research process, Hager Sharp sought input from the EEOC, holding an entrance conference to review the evaluation project and proposed methodology; hosting a stakeholder briefing to review and collect feedback on draft findings and recommendations; and submitting the draft report for feedback. This final report includes responses to EEOC’s feedback on the draft report.

### RECOMMENDATIONS
Our review of the EEOC’s social media program revealed tremendous potential for the program to successfully reach its objectives with greater priority and support. We offer the following recommendations to improve the program:

1. Hire people with specialized expertise to manage the social media program and its assets, specifically a dedicated social media manager and part-time (or contract) graphic designer and multimedia specialist.
2. Simplify the EEOC’s social media architecture by consolidating many of the existing social media channels and limiting creation of new channels.
3. Ensure all social media managers have access to a scheduling tool within one account.
4. Implement a consistent content approval process run by OCLA.
5. Facilitate a mandatory monthly meeting among all EEOC social media managers.
6. Implement an ongoing training series for all staff involved in the EEOC social media program.

7. Create and use an editorial calendar for social media content.

8. Develop content based on topics with strong performance and that uses social media best practices, including consistent branding for multimedia content and a greater number of videos.

9. Employ new social media tactics to reach vulnerable audiences.

10. Execute new tactics based on channels that generate traffic to EEOC web pages.

11. Use paid media to support improved reach and engagement.

12. Complete revisions to the social media handbook and provide to all staff managing social media channels.

13. Complete at least four social media campaigns per year (one per quarter) to prompt growth of social media channels and higher audience engagement.

14. Establish objectives for the social media program that include quantified targets.

15. Begin quarterly reporting on social media outcomes, using an online dashboard to ease data collection.

The full report that follows provides additional details on the findings, conclusions and recommendations that can inform improvements in the EEOC social media program that will help it achieve its social media objectives.
Background, Objectives, and Methodology

As part of its important work, the U.S. Equal Employment Opportunity Commission (EEOC) in its fiscal year (FY) 2018–2022 Strategic Plan prioritized enhancing “its use of social media to promote its education and outreach activities and to encourage greater use of the contents of its website.” The Strategic Plan also determined that the EEOC “will focus its technological advances [e.g., social media] on priority areas and specific communities to increase public access to information about rights and responsibilities under the laws the EEOC enforces.” EEOC set related objectives, specifically objective II—“Prevent employment discrimination and promote inclusive workplaces through education and outreach”—and two corresponding strategies, strategy II.A.2 to “Broaden the use of technology to expand our reach to diverse populations” and Strategy II.B.1 to “Utilize modern technology and media to expand our reach to employers and other covered entities.”

To ensure the EEOC’s social media program is effective at helping EEOC achieve the goals set forth in the strategic plan, the EEOC Office of the Inspector General (OIG) hired Hager Sharp to evaluate the program. The evaluation strives to understand how well EEOC is meeting these objectives and how it might adjust its approach to even better meet the objectives. Specifically, the purpose of this evaluation is to assess the EEOC’s management of its most important social media activities and provide EEOC’s Chair, Office of Communication and Legislative Affairs (OCLA), and other offices performing, or planning to perform, significant social media activities with useful recommendations for improving social media use, performance management and analysis, collaboration, and stakeholder engagement.

The research sought to address the following questions:

1. Is EEOC’s social media strategy logical and practical?
2. Is EEOC’s social media content development and information sharing effective and efficient to allow for clear two-way communication with its stakeholders?
3. Are the social media tactics used by EEOC effective and efficient?
4. Is EEOC’s social media performance monitoring effective and efficient in measuring stakeholder engagement, activity, and collaboration?

To answer these questions, Hager Sharp evaluated five key areas—social media content, tactics, strategy and process, planning, and measurement—to enable the development of a comprehensive set of findings and conclusions. We conducted four main research activities:

1. In-depth interviews with EEOC staff who play a role in the EEOC social media program’s strategy, development, or implementation. Hager Sharp met with 11 staff, including four from OCLA, two from the Office of Federal Operations (OFO), two from the Chair’s office, one from the Office of Field Programs (OFP), and two field offices.
These interviews helped us to gain a deeper understanding of the program, including current processes, tactics used, perceived successes, opportunities, and challenges, and documentation used.

2. **Quantitative and quantitative review of social media and website analytics** to understand the overall reach, engagement, and impact of EEOC social media channels as well as popular and less popular content types and topics and audiences addressed. We reviewed the metrics for the EEOC social media channels between October 1, 2018–September 30, 2020, including Facebook (USEEOC), LinkedIn (EEOC), Twitter (@USEEOC, @EEOCEspanol, @EEOC_EXCEL, and @EEOC_OFO) and YouTube (EEOC and OFO). Additionally, we reviewed metrics in Google Analytics between October 1, 2018–September 24, 2020.

3. **Review of EEOC’s social media performance reports** between October 1, 2018–September 30, 2020 to assess whether these performance evaluations are effective and efficient in measuring stakeholder engagement, activity, and collaboration. We reviewed the Performance Measure 6 FY2020 report, Performance Measure 6 FY2020 Metrics, Performance Measure 6 Customer Experience Surveys & FY2020 Priority Areas, Performance Measure 6 FY19 Reporting, and EEOC FY19 Digital Communications.

4. **Document review.** Hager Sharp conducted an in-depth review of the EEOC’s social media-related documents to determine whether the documents address all necessary topics and offer appropriate and helpful guidance to EEOC staff. We reviewed the EEOC’s Guide to Official Use of Social Media, the U.S. Equal Employment Opportunity Commission Guide to Official Use of Digital Communications and Social Media, the Small Business Monday LinkedIn campaign plan, EEOC Digital Communications—Evergreen Content, and EEOC Digital Communications Guide—A Review.

Each of the research tasks was critical to help us deeply understand the EEOC’s social media program—how social media managers create, publish, and measure content, and the content’s impact on the EEOC and stakeholders—so the EEOC can have a program that effectively and efficiently meets its objectives. Throughout the research process, Hager Sharp sought input from the EEOC, holding an entrance conference to review the evaluation project and proposed methodology; hosting a stakeholder briefing to review and collect feedback on draft findings and recommendations; and submitting the draft report for feedback. This final report includes responses to EEOC’s feedback on the draft report.
Findings

The EEOC has an extensive social media program with at least 25 active channels, as expressed in Exhibit 2. Three main offices manage the channels: OCLA, which has six social media channels; OFO, which has five social media channels; and field programs (managed through the Office of Field Programs [OFP]), which have 15 social media channels across 13 field offices. Across all of the EEOC, there are at least 16 active Twitter handles, three Facebook profiles, three Instagram handles, two YouTube channels, and one LinkedIn profile.

Exhibit 2. The EEOC’s Social Media Architecture
Strategic and Process

The EEOC diffuses the management of its social media channels across approximately 17 staff, with OCLA, OFO, and field offices each approaching social media staffing differently:

- In OCLA, one individual manages the EEOC YouTube and the @EEOCEspanol Twitter account while a different individual manages the EEOC Facebook, Instagram, and LinkedIn account.
- In OFO, two individuals manage a Facebook page, Instagram account, YouTube account, and two Twitter accounts.
- Within each field office with a social media presence, the Outreach and Education Coordinator serves as the social media manager.

Staff who manage a social media channel spend, on average, about two hours on the social media program per week. The most prominent factor contributing to EEOC staff’s low time commitment to the EEOC social media program was feeling like they have other responsibilities and duties that are central to their job titles and reason for hire. Two staff stated that they did not feel that the social media program currently is a priority among their duties.

Staff interviewed by Hager Sharp noted that they believe the EEOC should hire trained social media experts, whose positions would be fully committed to social media management, so that people who have the time and expertise to help the program be as high performing as is possible can lead it. A majority of the staff interviewed believed it would be in the best interest of the EEOC to have social media experts take on management of the social media program entirely or to drive the supervision and staff training pieces of the existing program.

Content Creation

To create social media content, EEOC staff who are responsible for managing social media channels most often directly repurpose content from the EEOC website, or utilize content published on EEOC’s main social media channels by way of “resharing” or “retweeting” the content. Staff reported several reasons for relying on established EEOC social media content, as opposed to the development of original content:

- Staff often do not feel confident or comfortable in developing new and engaging content. As the EEOC’s scope of work is heavily based in serious subject matter, such as discrimination and harassment, and can carry legal implications, staff overwhelmingly feel that using existing EEOC content is a “safe” approach to creating content.
- Relying on pre-existing content takes less time than creating original content, which allows them to focus on higher priority (non-social media) responsibilities.
Most staff are not developing their own multimedia content to use on social media, but those who do largely work within OCLA. OCLA staff noted typically creating multimedia materials for evergreen social media content, which OCLA then passes along to field offices to use. When developing multimedia content (i.e., graphics and videos), staff most often use basic and cost-efficient strategies. For example, staff mentioned developing graphics in PowerPoint and the free version of Canva, as well as filming EEOC videos on a handheld mobile device or low-quality office camera. Additionally, staff noted they use tools such as free online and mobile video editors or Microsoft Teams for video recording, and PowToons and Doodly for free or low-cost whiteboard-style videos.

Staff noted that they believe multimedia materials are integral to the success of EEOC channels and content, but they do not have the expertise, time, budget, or leadership buy-in (e.g., participation of the Chair in EEOC videos) to create them frequently or at the best quality possible.

**Internal Content Review**

The social media review process differed from office to office—and even channel to channel, depending on the staff managing the channel, whether the managed channel is a main EEOC channel or field office, and the degree of autonomy granted to each office.

For OCLA, content typically undergoes multiple levels of review and is sometimes subject to review by the Chair if it is for an agency-wide effort. Due to this more extensive review process, OCLA content often takes longer to become officially approved and available for posting, which causes its social media managers to have concerns about being able to put out content in a timely manner. The Spanish EEOC channel is unique in that it is usually not subject to the same level of review of the other OCLA-managed social media channels, with its social media manager using his own best judgement to determine what to post. However, video content for the Spanish channel is subject to review by the larger communications team, legal, and the Chair’s office.

OFO and the field offices with a social media presence generally have a far greater degree of autonomy. For these channels, there is typically little to no oversight or formal process for social media content review, with social media managers relying on their own best judgment when posting new content, or instead repurposing existing EEOC content to avoid the need for review.

**COMMUNITY MANAGEMENT**

Staff generally do not have a standard process in place for responding to comments and replies received on their social media content, proactively engaging with followers and audiences, or any other form of managing interactions with their online communities. Staff often do not engage with comments and replies, unless they are of a logistical nature (e.g., where to find...
information on the EEOC website, how to contact the EEOC via email or phone, etc.). There was one reported instance of blocking a commenter who aggressively replied to content posted on an EEOC-affiliated channel, but this type of action was not commonplace.

**BUDGET ENVIRONMENT**

Staff noted that the limited social media budget prevented them from utilizing high-quality social media tools and platforms or having premium subscriptions on the platforms currently in use, which would aid in the development of higher quality multimedia content. Limited budget also impacted the ability of staff to leverage social media tools with features intended to streamline and support social media management and metrics reporting more broadly. In addition, lack of budget prevented staff from using paid media to bolster social media efforts.

**CHANGES CURRENTLY BEING IMPLEMENTED**

Staff are making strides to streamline the social media management process and better coordinate across channels. Staff have launched a working group, comprised of several outreach and education coordinators from field offices, which has the short-term goal of ensuring consistent social media content at least twice a month and developing a monthly toolkit for field offices that can inform content development (e.g., evergreen messages, specific content around the Chair’s priorities, and other relevant observances). The working group also integrates OCLA staff in its monthly calls and planning process to help establish greater coordination.

Additionally, outreach and education coordinators managing field office social media channels plan to leverage the social media tool Agorapulse to help organize and better manage content development, community management, metrics reporting, and internal collaboration. OFO is also exploring the possibility of utilizing Agorapulse for its existing channels, to maximize these same benefits.

**CONTENT AND TACTICS**

To understand how the approach and processes used by EEOC staff impact the effectiveness of the EEOC’s social media results, Hager Sharp performed a review of the EEOC’s social media channels with larger followings, the most original content, and available data. The review helped us understand each channel’s overall reach and engagement, as well as how well the content published to the EEOC social media channels engages followers and aligns with social media objectives. This review allowed us to assess the content against social media best practices.

To complete this analysis, we reviewed the performance of four Twitter handles (@USEEOC, @EEOCEspanol, @EEOC_EXCEL, and @EEOC_OFO), EEOC’s Facebook page, the EEOC
and OFO’s YouTube channels, and the EEOC’s LinkedIn page.\(^1\) The review encompassed posts between October 1, 2018–September 30, 2020.\(^2\) We analyzed the data based on:

- **Impressions.** The number of times content was viewed.
- **Engagements.** The number of times viewers of social media content engaged with the content. This includes retweets/shares, comments, likes, and link clicks, among others.
- **Engagement rate.** The number of engagements received on content, divided by the number of impressions, expressed as a percentage.
- **Click-through rate (CTR).** The number of link clicks received on content, divided by the number of impressions, expressed as a percentage.

Exhibit 3 shows the performance by channel, with the top-performing and bottom-performing channels color-coded in green and red, respectively. We found that the EEOC main handles (Facebook, LinkedIn, and @USEEOC Twitter) were the most successful at core social media metrics: impressions, engagement rate, and CTR. LinkedIn performance was strongest, particularly given the shorter timeframe that was available for analysis. Facebook had the highest engagement rate while Twitter had the highest impressions.

The Twitter handles @EEOC_EXCEL and @EEOCEspanol had the lowest performance, generating the least engagement and fewest link clicks.

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\(^1\) We selected these channels because they have larger followings, the most original content, and because they had data available. We did not analyze the field offices’ channels, as they most often share main EEOC content rather than publishing new, original content. We did not review the OFO Facebook page because it is set up as a personal page, which means data is not available. Additionally, we could not formally review either Instagram handle because Instagram only offers 30 days of past data natively.

\(^2\) LinkedIn data was only available for January–December 2020.
Exhibit 3. Performance by Channel

<table>
<thead>
<tr>
<th>CHANNEL</th>
<th>IMPRESSIONS</th>
<th>RETWEETS</th>
<th>COMMENTS</th>
<th>LIKES</th>
<th>LINK CLICKS</th>
<th>ENGAGE-MENT RATE</th>
<th>CTR</th>
</tr>
</thead>
<tbody>
<tr>
<td>FACEBOOK (USEEOC)</td>
<td>648,893</td>
<td>5,320</td>
<td>2,577</td>
<td>11,425</td>
<td>1,965</td>
<td>5.57%</td>
<td>0.30%</td>
</tr>
<tr>
<td>LINKEDIN</td>
<td>715,448</td>
<td>2,453</td>
<td>449</td>
<td>10,793</td>
<td>22,005³</td>
<td>4.99%</td>
<td>3.08%</td>
</tr>
<tr>
<td>TWITTER (@EEOC_EXCEL)</td>
<td>105,123</td>
<td>83</td>
<td>13</td>
<td>217</td>
<td>221</td>
<td>1.20%</td>
<td>0.21%</td>
</tr>
<tr>
<td>TWITTER (@EEOC_OFO)</td>
<td>330,990</td>
<td>299</td>
<td>72</td>
<td>402</td>
<td>598</td>
<td>1.11%</td>
<td>0.18%</td>
</tr>
<tr>
<td>TWITTER (@EEOC ESPAÑOL)</td>
<td>605,160</td>
<td>302</td>
<td>41</td>
<td>263</td>
<td>78</td>
<td>0.53%</td>
<td>0.01%</td>
</tr>
<tr>
<td>TWITTER (@USEEOC)</td>
<td>3,462,138</td>
<td>3,595</td>
<td>582</td>
<td>4,080</td>
<td>8,352</td>
<td>1.02%</td>
<td>0.24%</td>
</tr>
<tr>
<td>YOUTUBE (EEOC)</td>
<td>67,468</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>YOUTUBE (OFO)</td>
<td>78,422</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
</tr>
</tbody>
</table>

SOCIAL MEDIA TACTICS

To better understand the tactics and content used on the EEOC’s social media, Hager Sharp analyzed a random sample (n=225⁴) of all posts on the same channels, excluding YouTube, and timeframe noted above. Among the random sample, there were 56 Facebook posts, 21 LinkedIn posts, 65 @USEEOC Twitter posts, 39 @EEOCEspanol Twitter posts, 35 @EEOC_OFO Twitter posts, and nine @EEOC_EXCEL Twitter posts.

We reviewed the random sample against three variables: content topic, content format (e.g., link preview, video), and audience targeted. Exhibits 4–6 show the number of posts, the percentage of the random sample represented, impressions, engagement rate and click-through rate (CTR) for

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³ LinkedIn reports “clicks,” which includes link clicks as well as clicks anywhere within the post.

⁴ Hager Sharp coded 225 randomly selected posts out of a total population size of 1,309 posts. The date range included in the total population was October 1, 2018–September 30, 2020 for Facebook and Twitter channels and January 1, 2020–December 31, 2020 for LinkedIn. This sample has a confidence level of 90% with a 5% margin of error.
each variable. In the charts below, Hager Sharp color-coded the top-performing and bottom-performing content in green and red, respectively.

**Content Topics**

Content featuring information around discrimination (including discrimination laws and guidance and discrimination by type) performed best on the EEOC’s social media channels. Content featuring discrimination by type had the highest engagement rate of all topics (2.21%) while content featuring discrimination laws and guidance had the highest CTR of all topics (0.96%).

**Exhibit 4. Content Topics Prevalence and Engagement**

<table>
<thead>
<tr>
<th></th>
<th>NUMBER OF POSTS (PERCENTAGE OF RANDOM SAMPLE)</th>
<th>IMPRESSIONS</th>
<th>ENGAGEMENT RATE</th>
<th>CTR</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GENERAL EEOC UPDATES</strong></td>
<td>62 (27.56%)</td>
<td>286,582</td>
<td>1.30%</td>
<td>0.67%</td>
</tr>
<tr>
<td><strong>LITIGATION</strong></td>
<td>43 (19.11%)</td>
<td>195,974</td>
<td>1.13%</td>
<td>0.27%</td>
</tr>
<tr>
<td><strong>DISCRIMINATION LAWS AND GUIDANCE</strong></td>
<td>43 (19.11%)</td>
<td>174,799</td>
<td>1.99%</td>
<td>0.96%</td>
</tr>
<tr>
<td><strong>EVENT</strong></td>
<td>41 (18.22%)</td>
<td>149,606</td>
<td>0.74%</td>
<td>0.41%</td>
</tr>
<tr>
<td><strong>DISCRIMINATION BY TYPE</strong></td>
<td>23 (10.22%)</td>
<td>122,670</td>
<td><strong>2.21%</strong></td>
<td>0.79%</td>
</tr>
<tr>
<td><strong>MEDIATION</strong></td>
<td>6 (0.03%)</td>
<td>25,984</td>
<td>1.82%</td>
<td>0.85%</td>
</tr>
<tr>
<td><strong>OTHER</strong></td>
<td>4 (0.02%)</td>
<td>3,811</td>
<td><strong>0.10%</strong></td>
<td><strong>0.03%</strong></td>
</tr>
<tr>
<td><strong>INTERAGENCY PROGRAMS</strong></td>
<td>2 (0.01%)</td>
<td>16,964</td>
<td>0.55%</td>
<td>0.11%</td>
</tr>
<tr>
<td><strong>INITIATIVES</strong></td>
<td>1 (0.00%)</td>
<td>18,205</td>
<td>0.48%</td>
<td>0.28%</td>
</tr>
</tbody>
</table>

**Content Format**

Content featuring link previews performed best on the EEOC’s channels by engagement rate (1.90%) while images with a significant portion (50–100%) of text had the highest CTR (0.93%). However, our analysis showed the EEOC most often shared content that did not include graphics (text only). Text-only content did not perform as well with a CTR of 0.30% and an engagement rate of 0.67%. The EEOC did not share many videos across channels so the sample of posts with videos was minimal.
### Exhibit 5. Content Format Prevalence and Engagement

<table>
<thead>
<tr>
<th></th>
<th>NUMBER OF POSTS (PERCENT OF RANDOM SAMPLE)</th>
<th>IMPRESSIONS</th>
<th>ENGAGEMENT RATE</th>
<th>CTR</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TEXT-ONLY</strong></td>
<td>70 (31.11%)</td>
<td>283,419</td>
<td>0.67%</td>
<td>0.30%</td>
</tr>
<tr>
<td><strong>IMAGE WITH 50–100% TEXT</strong></td>
<td>57 (25.33%)</td>
<td>324,890</td>
<td>1.83%</td>
<td>0.93%</td>
</tr>
<tr>
<td><strong>LINK PREVIEW</strong></td>
<td>43 (19.11%)</td>
<td>121,045</td>
<td>1.90%</td>
<td>0.53%</td>
</tr>
<tr>
<td><strong>IMAGE WITH UP TO 50% TEXT</strong></td>
<td>40 (17.78%)</td>
<td>229,479</td>
<td>1.50%</td>
<td>0.63%</td>
</tr>
<tr>
<td><strong>IMAGE WITH NO TEXT IN IMAGE</strong></td>
<td>13 (5.78%)</td>
<td>32,034</td>
<td>0.94%</td>
<td>0.06%</td>
</tr>
<tr>
<td><strong>VIDEO</strong></td>
<td>2 (0.01%)</td>
<td>3,728</td>
<td>0.46%</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### Audience
Employer-focused messages performed best by engagement rate (1.99%) and CTR (0.94%). The EEOC most often shared content that appeared to target the general public. Content for diverse populations had the lowest engagement rate and CTR.

### Exhibit 6. Audience Targeted Prevalence and Engagement

<table>
<thead>
<tr>
<th></th>
<th>NUMBER OF POSTS (PERCENT OF RANDOM SAMPLE)</th>
<th>IMPRESSIONS</th>
<th>ENGAGEMENT RATE</th>
<th>CTR</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>GENERAL PUBLIC</strong></td>
<td>102 (45.33%)</td>
<td>512,468</td>
<td>1.45%</td>
<td>0.59%</td>
</tr>
<tr>
<td><strong>EMPLOYERS</strong></td>
<td>57 (25.33%)</td>
<td>293,832</td>
<td>1.99%</td>
<td>0.94%</td>
</tr>
<tr>
<td><strong>DIVERSE POPULATIONS</strong></td>
<td>39 (17.33%)</td>
<td>84,244</td>
<td>0.13%</td>
<td>0.02%</td>
</tr>
<tr>
<td><strong>FEDERAL STAKEHOLDERS</strong></td>
<td>22 (0.10%)</td>
<td>79,255</td>
<td>0.30%</td>
<td>0.10%</td>
</tr>
<tr>
<td><strong>SMALL BUSINESS OWNERS</strong></td>
<td>5 (0.02%)</td>
<td>24,796</td>
<td>1.13%</td>
<td>0.42%</td>
</tr>
</tbody>
</table>
Generating website traffic using social media is one objective for the social media program. Overall, EEOC.gov received 307,480 website sessions between October 1, 2018 and September 24, 2020, which represents 1.6% of all traffic to the EEOC’s website. Website traffic that originates via social media (also called social media referrals) can result from two mechanisms: 1) the EEOC’s own social media channels and 2) social media channels of other organizations and people. Exhibit 7 shows the total sessions from the top five social media referrers compared to the number of link clicks generated by the EEOC’s presence on the platform, where applicable. Based on Exhibit 7, most of EEOC.gov’s social media referrals resulted from others’ social media channels, not the EEOC’s.

**Exhibit 7. Total Sessions from Top Five Social Media Referrers**

<table>
<thead>
<tr>
<th>CHANNEL</th>
<th>TOTAL SESSIONS</th>
<th>NUMBER OF LINK CLICKS ON THE EEOC’S SOCIAL MEDIA CHANNELS</th>
</tr>
</thead>
<tbody>
<tr>
<td>FACEBOOK</td>
<td>216,263</td>
<td>1,965 (0.91% of the total website sessions from Facebook)</td>
</tr>
<tr>
<td>TWITTER</td>
<td>49,098</td>
<td>9,249 (18.84% of the total website sessions from Twitter)</td>
</tr>
<tr>
<td>LINKEDIN</td>
<td>19,987</td>
<td>Data not available</td>
</tr>
<tr>
<td>REDDIT</td>
<td>7,785</td>
<td>N/A</td>
</tr>
<tr>
<td>YOUTUBE</td>
<td>2,709</td>
<td>Data not available</td>
</tr>
</tbody>
</table>

As shown in Exhibit 7, Facebook was the top social media channel to refer website traffic, but also the channel in which the EEOC’s social media channels delivered the smallest percentage of the web traffic. This would indicate that people on Facebook are receiving and interested in EEOC content but are not receiving that content from the EEOC itself.

Please note, Instagram was not among the top five social media referral sources, despite EEOC having three Instagram handles. As a social referral source, Instagram led to 1,846 sessions. (We do not have the EEOC’s Instagram click data for comparison.)

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5 A session is a set of user interactions with a website that take place within a given time frame.
6 EEOC made changes its web metrics collection methods in Google during the time period, which resulted us reviewing historical web metrics in two groupings: October 1, 2018–April 30, 2020 and May 1, 2020–September 24, 2020. Web data after September 24, 2020 was only available in a separate Google Analytics dashboard. To reduce any discrepancies between dashboards, the team only reviewed data through September 24, 2020.
Popular Website Content for Visitors from Social Media

Popular website content for social media visitors varied depending on the timeframe, as well as the social media channel of origin. Prior to the COVID-19 pandemic (October 1, 2018–April 30, 2020), the most-visited web pages from social media included the EEOC home page (31,560 sessions) and the fact sheet “Immigrants’ Employment Rights Under Federal Anti-Discrimination Laws” (29,465 sessions).

After the start of the COVID-19 pandemic (May 1–September 24, 2020), pages with information related to COVID-19 were most popular among social media referrals. The EEOC web page “What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws” saw the most social media referrals (14,635). This is likely because COVID-19 content was very timely. The EEOC home page saw the second-highest number of sessions during this timeframe (6,274).

The top landing page7 for social media referrals varied based on the social media channel, indicating differences in how individuals and organizations use the channels. For example, Reddit—often used for peer-to-peer opinion sharing—most commonly linked to how to file a charge of discrimination. It was also the only social media channel that did not include the home page as a landing page. Exhibit 8 shows the top landing pages for the top five social media referral sources.

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7 A landing page is the first page you “land on” after clicking a link.
Exhibit 8. Landing Page for Top 5 Social Media Referral Sources

<table>
<thead>
<tr>
<th>CHANNEL</th>
<th>LANDING PAGE</th>
</tr>
</thead>
</table>
| FACEBOOK | 1) EEOC home page  
2) Immigrants’ Employment Rights Under Federal Anti-Discrimination Laws  
3) What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws |
| TWITTER | 1) Immigrants’ Employment Rights Under Federal Anti-Discrimination Laws  
2) EEOC home page  
3) EEOC.gov/shutdown⁸ |
| LINKEDIN | 1) What You Should Know About COVID-19 and the ADA, the Rehabilitation Act, and Other EEO Laws  
2) Age Discrimination  
3) EEOC home page |
| REDDIT | 1) Filing a Charge of Discrimination  
2) Immigrants’ Employment Rights Under Federal Anti-Discrimination Laws  
3) Select Task Force on the Study of Harassment in the Workplace |
| YOUTUBE | 1) The Equal Pay Act of 1963  
2) Federal Training and Outreach  
3) EEOC home page |

**Planning**

To understand how the EEOC conducts social media planning—both for social media campaigns but also for its program as a whole—Hager Sharp conducted an in-depth review of the EEOC’s social media-related documents to determine whether the documents address all necessary topics and offer appropriate and helpful guidance to EEOC staff. EEOC provided the following materials to Hager Sharp for review:

- *Small Business Monday LinkedIn* campaign plan
- *EEOC’s Guide to Official Use of Social Media* (“social media handbook”)
- *EEOC Digital Communications—Evergreen Content*
- *EEOC Digital Communications Guide—A Review*

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⁸ This page is no longer available and Hager Sharp is uncertain of its contents.
CAMPAIGN PLANNING

The EEOC provided one social media campaign plan to Hager Sharp for review, the Small Business Monday LinkedIn campaign plan. This campaign plan provided copy, images, and links for staff to post during the campaign. The plan did not include important components such as campaign objectives, benchmarks for success, a specific posting schedule, or high-quality versions of the images intended to accompany the posts. In responding to the draft report, the EEOC noted that it developed four additional campaign plans during the timeframe of interest; however, as Hager Sharp was not provided those plans, we have not included an analysis of their contents in this report.

SOCIAL MEDIA GUIDANCE

The EEOC has guidance available to help staff managing social media channels, including a social media handbook and “how-to” documents and guidance created specifically for field offices. The social media handbook addresses the following topics:

- Official use vs. personal use
- EEOC channel creation process and protocol
- Appropriate use of social media (platform-specific guidelines, purposes, content tone and type, etc.) and best practices
- Records management
- Media inquiries
- Privacy statements

The EEOC Digital Communications—Evergreen Content and EEOC Digital Communications Guide—A Review address the following topics:

- Evergreen content (types, examples, benefits)
- Posting frequency per platform
- Goals of EEOC channels
- Privacy statements
- Twitter photo descriptions
- Content tone and language

Staff did not have strong opinions, positive or negative, about the effectiveness or usability of the guidance documents for social media management. Generally, staff noted that they rarely, if at all, refer to the documents. Staff noted that they rarely used the guidance because they rely on reshauling or repurposing existing EEOC content, noting that existing EEOC content is already approved and permissible for use. Staff also noted that they prefer how other government agencies develop their guidance (specifically, the U.S. Department of Labor).
Hager Sharp’s review of the handbook uncovered a few points of concern with the current iteration of the EEOC social media handbook, specifically:

- The current handbook is outdated and does not reflect the most up-to-date best practices for social media (e.g., The handbook states a 140-character limit for Twitter, but Twitter updated its character limit to 280 characters in 2017).
- The handbook is not comprehensive enough for those who are not experts in social media, like EEOC staff, as it often does not define key social media terms (e.g., engagement rate, impressions) and includes phrases that can have different interpretations by different people (e.g., “regularly post”).

Hager Sharp found the EEOC Digital Communications—Evergreen Content and EEOC Digital Communications Guide—A Review, specifically created for the field offices, to be well-crafted and among the most useful of guidance available for EEOC social media managers, as they provide clear examples (e.g. types of evergreen content, images of evergreen content), define processes and standards (e.g. steps for setting Twitter image descriptions, chart outlining specific number of times to post on each platform per day), and are presented in a short, digestible format (highly visual PowerPoints) that strikes the balance between being informative, but not overwhelmingly dense.

Hager Sharp also reviewed the U.S. Equal Employment Opportunity Commission Guide to Official Use of Digital Communications and Social Media, which at the time of our field work, was a draft handbook intended to replace the current handbook. It had been under the Chair’s review for an extended period of time. The revised handbook provided a strong overview of expectations for staff and a comprehensive list of approved social channels for EEOC use, but it did not provide comprehensive guidance on social media performance evaluation, community management, or definitions on key social media terms (e.g., impressions, CTR, engagement rate) and highly interpretable phrases (e.g., “regular use”). Following our document review, we learned that OCLA would develop a second revised handbook, modeled on the Department of Interior’s (DOI) Digital Media Guide.

**Measurement**

In additional to guidance documents, Hager Sharp reviewed social media measurement reports. Hager Sharp reviewed three fiscal year reports—Performance Measure 6 FY2020 Report, Performance Measure 6 FY2020 Reporting, Performance Measure 6 FY19 Reporting—as well as Performance Measure 6 Customer Experience Surveys & FY2020 Priority Areas and EEOC FY19 Digital Communications as the exhaustive list of reports containing social media data completed between October 1, 2018 and September 30, 2020. In responding to the draft report, the EEOC noted that it developed monthly reports during the timeframe of interest; however, as
Hager Sharp was not provided those reports, we have not included an analysis of their contents in this report.

The social media reporting across the documentation provided to Hager Sharp was high-level. These reports included some website and OCLA social media data, specifically:

- Follower count, impressions, and engagements for OCLA social media channels
- Total website visits, page views, and unique visitors
- Website sources, including social media
- Top searches within EEOC.gov

These documents only included outcomes for OCLA social media channels and did not address the impact of OFO or field office channels. The reports also covered entire fiscal years and did not address monthly fluctuations. The reports also do not set goals for the metrics included that could drive future outreach efforts.
Conclusions & Recommendations

The structure and execution of the EEOC’s social media program leads to both unique opportunities and challenges. We believe that the EEOC’s social media program has tremendous potential to successfully reach its objectives. However, to do so, the EEOC must make revisions to the program that give it greater support. Without such support, the EEOC risks limiting its ability to use social media to promote its activities, use of its website, and increase public access to information related to employment rights and responsibilities. Hager Sharp has developed the following conclusions and recommendations based on our findings.

Strategy and Process

The EEOC’s social media program is decentralized with many different social media managers holding social media responsibilities across offices. This allows the EEOC to have a widespread presence across social channels and provides the EEOC the ability to reach a larger audience and tailor messaging for specific audiences.

However, there are substantial challenges to the current social media program related to the decentralization:

- **There are a large number of social media channels**, which may make it challenging for audiences to understand which channels to follow. The proliferation of channels has been enabled by a lack of centralized oversight. Siloes across the EEOC may also drive this growth.

- **Social media content is of variable quality**. Staff do not feel confident developing new and engaging content, and do not have the resources to create high-quality graphics and videos, which increase engagement. Offices have different content approval processes, with some having extensive review process and others making more unilateral determinations about content.

- **Social media managers rarely engage with consumers on social media**. The EEOC does not have a concrete policy around community management (i.e., responding to comments), which may contribute to inconsistencies in, or lack of, responses across channels.

- **Staff do not dedicate a significant portion of time to the social media program—nor do they feel social media is a priority**. Social media managers have varying levels of knowledge for how to best manage the social media channels to maximize their performance.

- **The EEOC’s current social media architecture is not enabling the EEOC to best meet its objectives**. The greatest proliferation in social channels has been on Twitter. However, Twitter has a low CTR compared to the EEOC’s LinkedIn and Facebook,
indicating a missed opportunity to increase website traffic through different channel selection.

- **The EEOC does not have a dedicated budget for social media**, which could be immensely beneficial to individual social media managers as well as the overarching EEOC social media program. A dedicated budget can facilitate the purchase of management tools to improve cross-channel collaboration and reporting, and creation of high-quality graphics and videos. Additionally, a dedicated budget can support use of paid media on social media channels, which would enable them to be more effective and to target high-priority audiences.

- **The EEOC does not have a full understanding of the impact of its social media program**, since OFO and field programs do not submit metrics to OCLA for inclusion in its social media reporting.

The culmination of these challenges is that the EEOC social media channels are producing a high volume of social media content of mixed quality, which ultimately leads to fewer engagements and impressions than if EEOC produced consistently high-quality social media content, reducing the program’s overall impact.

**RECOMMENDATIONS**

1. **Hire people with specialized expertise to manage the social media program and its assets, specifically a dedicated social media manager and part-time (or contract) graphic designer and multimedia specialist.**

As the lead of the social media program, the dedicated, full-time social media manager would be responsible for managing (or overseeing the management of) OCLA’s main social media handles and facilitating strong, cohesive content and performance among all the EEOC channels, including OFO and field offices. The facilitation across channels should include activities like planning monthly meetings for all social media managers, planning social media trainings, distributing evergreen content to all social media managers, coordinating metrics collection and reporting, among other activities. This individual should have extensive experience in social media management (at least 8+ years) and EEOC should empower them to oversee the entire social media program.

Hager Sharp also recommends hiring a part-time or contract graphic designer and multimedia specialist. Providing access to a graphic designer and multimedia specialist can better ensure EEOC uses consistent branding with high-quality design and incorporates more video into content. While OCLA should be the primary user of the graphic designer and multimedia specialist, OFO and field offices should also have the ability to request graphic/video support.
when needed. Hager Sharp does not anticipate these being full-time positions but would envision the roles as distinct from that of the social media manager, as graphic design and multimedia editing required specialized training. As it seeks to implement this recommendation, the EEOC should consider providing additional training for current OCLA staff who create graphics and multimedia content, and then widely sharing the content among OFO and field office managers.

2. **Simplify the EEOC’s social media architecture by consolidating many of the existing social media channels and limiting creation of new channels.** While keeping social media channels siloed by office may ease management in the current structure, it has not led to a strong, coordinated, high-quality social media program. Reducing the number of channels will allow the EEOC to focus its efforts on improving the quality of content. Overall, we recommend archiving many of OFO’s channels, as the content fits within the larger EEOC channels, and reviewing the field office channels to understand whether they are providing unique perspective that could not otherwise be captured through the OCLA-run channels. Hager Sharp’s recommendations for consolidation are as follows:

- **Archive the EEOC OFO Facebook page.** This page is incorrectly set up as a “personal” Facebook page with only 22 followers.\(^9\) Content that OFO typically would publish on this page can live on the EEOC Facebook page.
- **Archive the @EEOCOFO Instagram account.** Instagram is not a strong fit from a content perspective: Instagram is focused on high-quality graphic and video content, for which the EEOC is currently limited. Instagram also does not offer the ability to drive website traffic, as posts cannot include hyperlinks. For these reasons, we recommend the EEOC limit its presence on Instagram to one channel.
- **Archive the @EEOC_EXCEL Twitter.** EXCEL program staff can publish this content under the @EEOC_OFO Twitter handle, as the audiences are similar. This merger may also help boost the @EEOC_OFO Twitter performance, as the EXCEL content has higher engagement and click-through rates.
- **Move the EEOC, OFO Training Videos into a playlist within the TheEEOC YouTube channel.** While the EEOC, OFO Training Videos are well-viewed, having two channels makes it harder for potential viewers to find all of the EEOC’s videos.
- **Conduct a review of each field office channel** and determine, in consultation with the field office and OFP, whether the EEOC should continue or archive the field office’s social media presence, based on amount of unique content produced, size of

\(^9\) As of April 6, 2021.
community, and outcomes (e.g., impressions, engagements, link clicks). We recommend limiting field offices to one social media channel.

3. **Ensure all social media managers have access to the same scheduling tool within one account.** This could be Agorapulse, which the EEOC is currently exploring, or another tool (e.g., Hootsuite, Sprout Social). Social media managers can use the tool for scheduling EEOC social media content, community management, and reporting on performance across all channels. All users should have individual logins, if possible, within one master EEOC account, to help with content approval processes, content sharing, and metrics visibility across offices.

4. **Implement a consistent content approval process run by OCLA.** OCLA, OFO and field offices should work together to develop a process that balances ensuring on-message content with timeliness. For example, the EEOC may decide that only certain content requires OCLA review (e.g., content related to current events) while other content does not (e.g., content specific to an individual field office). We recommend using the social media scheduling tool to conduct this approval process, so that content does not get lost in email. OCLA should implement processes that allow for speedy review and commit to review within a certain number of days, highlighting during monthly meetings how well it is doing at meeting that timeframe, to build confidence among OFO and field offices that OCLA will review content it submits in a timely manner.

5. **Facilitate a mandatory meeting among all EEOC social media managers.** During this meeting, social media managers across OCLA, OFO, and field offices can review their social media performance, discuss planned activities and challenges encountered, and share content and/or social media resources. They should also use the meetings to conduct trainings and review new EEOC protocols or guidance. Once hired, the full-time social media manager should run this meeting. This meeting should occur no less often than once per month.

6. **Implement an ongoing training series for all staff involved in the EEOC social media program.** This would include a beginner course for individuals with little to no experience, an intermediate course for individuals with some experience, and an advanced course for those with more experience. At a minimum, the trainings should cover:
   - Basics per social media channel
   - Writing content that is optimized per channel
   - Optimizing graphics per channel
   - Performance monitoring and reporting
Community management best practices

An outside party may initially plan and implement the trainings, but ultimately the full-time social media manager can plan and facilitate the trainings. EEOC may choose to have multiple, short trainings, or fewer, longer trainings, depending on agency preferences. EEOC should complete these trainings within a year of the final report’s issue date.

CONTENT AND TACTICS

The EEOC is not always using the channels, topics, and tactics associated with better outcomes—or its strategic objectives—most frequently. Specifically, we found that:

- Messaging around discrimination laws and guidance as well as discrimination by type had the highest CTR on the EEOC’s social channels. These messages are effective at encouraging greater use of the website. However, the EEOC most often posts general EEOC updates (e.g., holiday/observance messages, performance reports, office closure notices), rather than about education and outreach activities. These types of updates, while still important, do not align with the EEOC’s strategic objectives for the social media program and they do not receive much engagement or drive website traffic.

- Content featuring link previews performed best on the EEOC’s channels by engagement rate while images with a significant portion of text had the highest CTR. However, our analysis showed that the EEOC shared text-only content in about 30% of posts, when text-only content did not perform as well as link previews or images.

- The EEOC did not share many videos across channels, making it hard to understand their potential impact. However, current social media best practices point to the enormous potential impact of video on maximizing social media outcomes.

- The EEOC’s content most frequently is intended for a general audience, rather than EEOC’s priority audiences. The EEOC expressed a desire to reach vulnerable audiences, both in interviews and in its documentation, using social media. The EEOC partially accomplishes this through its Spanish-language Twitter handle, for which its social media manager translates and culturally adapts content. However, other EEOC channels did not publish many messages geared to this audience. Even targeted content for this audience receives minimal engagement, indicating that the audience is not among the EEOC’s core follower base.

Additionally, social media drives limited traffic to the EEOC website, representing 1.6% of all traffic to the EEOC’s website. Based our review, most of EEOC.gov’s social media referrals come from non-EEOC social media channels. There is particularly large opportunity to drive additional traffic via Facebook and Reddit, as these channels were among the top five social
media referrers and EEOC channels did not drive a corresponding high number of link clicks. Given driving website traffic using social media is one objective for the social media program, the EEOC should make particular effort to increase this metric.

The EEOC does not use paid media to support its social media efforts. Paid support for social media is critical in today’s media environment, in which organic social media has very minimal reach. Paid media can help ensure the EEOC social media content has higher reach and engagement, reaches its intended audiences, and drives greater website traffic—ultimately positioning the EEOC social media program for greater success.

RECOMMENDATIONS

7. Create and use an editorial calendar for social media content. Editorial calendars help plan for content, enabling organizations to better align their content with strategic priorities. The editorial calendar should contain a high-level six-month view that plans for EEOC activities (e.g., EXCEL conferences), observances, and/or priorities. The six-month view should also articulate the content and audience priorities for that timeframe. On a monthly basis, social media managers should update the calendar with the planned daily content, with some indication for how the daily content aligns with the content and audience priorities and events.

8. Develop content based on topics with strong performance and that uses social media best practices, including consistent branding for multimedia content and a greater number of videos. Social media content should be plain language, succinct, and engaging. Social media allows for creativity in content development through format, emojis, etc., and should not be verbatim website copy. Specifically, we recommend:

- Building out a robust list of evergreen content focused on topics with strong performance—such as discrimination laws and guidance as well as discrimination by type—to share across all social media channels.
- Developing clear branding guidelines for staff that include logo requirement, font, color codes, etc., which would be used to ensure that all multimedia content across EEOC channels has consistent branding. Branding consistency would help followers recognize the visuals as from the EEOC, which would help distinguish its content from the content of other pages. This branding guide should be shared EEOC-wide.
- Develop a greater number of videos optimized for social media. To ensure the best opportunity for strong outcomes, the EEOC should look to create videos that are as short as possible (ideally no longer than 30 seconds), visually interesting, and that
have open captioning. As they require greater resources to produce, the videos should align with the EEOC’s most important strategic priorities and be evergreen, so that they can be widely used through the EEOC’s social media program.

9. **Employ new social media tactics to reach vulnerable audiences.** To reach vulnerable audiences, the EEOC must tailor messages to this audience and reach them where they are—which is not likely to be the EEOC’s current social media channels. The EEOC can more intentionally reach this audience by using paid social media advertising or by partnering with other organizations with more direct reach into these populations on social media tactics (e.g., co-hosting a Facebook Live).

10. **Execute new tactics on channels that generate traffic to EEOC web pages.** Facebook, Reddit, and YouTube—Facebook in particular—drove high numbers of sessions to EEOC.gov. As the EEOC considers where to invest efforts for “events” (see Planning recommendations that follow), it should prioritize the social media channels that generate the most traffic so as to maximize potential website traffic from the events.

11. **Use paid media to support improved reach and engagement.** As noted in this report’s conclusions, paid support for social media is critical in today’s media environment and can help ensure the EEOC social media program successful reaches its objectives. The paid support can be particularly impactful for high-priority content that is aligned with EEOC’s objectives. Paid support can be used to reach a general audience (i.e., U.S. adults) or priority audiences for whom specific EEOC messages are intended (e.g., federal employees, employers). For example, if EEOC wanted to increase registration for its Annual Examining Conflicts in Employment Laws (EXCEL) Training Conference, it could use paid media targeted to human resource professionals, employment law attorneys, and alternative dispute resolution professionals. Social media support can be scaled against the EEOC’s available budget; even small investments can yield results, with greater investment resulting in greater results. All of the social media channels on which EEOC has a presence have no advertising minimums.

**Planning**

The EEOC has limited documentation to assist social media managers in planning, executing, and measuring its social media program. The EEOC’s currently available handbook is dated and does not reflect the most up-to-date best practices for social media. It is also not comprehensive enough for those who are non-experts in social media, like EEOC staff. The EEOC’s efforts to revise the handbook hit internal roadblocks, with a revised handbook developed but never widely released to staff. The revised handbook provided a strong overview of expectations for staff and
a comprehensive list of approved social channels for EEOC use, but it did not provide enough
detail (e.g., guidelines for performance measurement, definitions of key terms) for EEOC staff.

With the change in presidential administration and resultant changes in the Commission, the
EEOC is developing a second revised handbook. While this provides the opportunity to update
and address changes resulting from this program evaluation, the ongoing delay leaves staff
without documentation for how to manage their social media programs.

In addition to gaps in guidance, the EEOC conducts limited planning for social media activities.
The campaign plan that the EEOC provided to Hager Sharp included graphics and key messages,
but did not include an overarching strategy that clearly tied to the EEOC’s social media
objectives or an approach for performance evaluation. Documentation of campaign planning
helps ensure campaigns’ success: articulating objectives provides understanding for how the
campaign fits into the EEOC’s larger communications objectives, while setting benchmarks
allows staff to evaluate whether or not the campaign was successful upon its conclusion.
Additionally, while the EEOC, in its response to the draft report, noted having created five
campaign plans during the two-year timeframe, more frequent and regular campaigns can help
drive higher-level engagement than day-to-day activities.

**RECOMMENDATIONS**

12. **Complete revisions to the social media handbook and provide to all staff managing social media channels.** The handbook should include, at a minimum:

- Guidelines for starting new channels, including clear steps for requesting approval to
  start new channels and what new channels are likely to gain approval.
- Community management guidelines, including the comment policy that channel
  managers must post on, or link to from, each channel. The guidelines should clearly
  state when comments require responses, when responses may be beneficial, when not
  to respond, and when a social media manager should flag or hide comments. The
  guidelines should also include sample responses for common comments.
- Content posting expectations, including specifying the minimum number of posts per
day expected per channel, as well as the recommended number.
- Any required policies that channel managers need to follow, such as mandatory
  trainings, content approvals, work group participation, metrics submissions, etc.
- Social media metrics that are critical to the EEOC’s success, definitions of these
  metrics, and recommendations and/or requirements for how often to collect these
  metrics.
As noted in conversations with EEOC staff, the EEOC is considering using the DOI’s Digital Media Guide as a foundation for its revised social media handbook, an approach that Hager Sharp is in agreement with, as DOI’s guide is comprehensive and easy-to-access.

13. Complete at least four social media campaigns per year (one per quarter) to prompt growth of social media channels and higher audience engagement. Examples of social media campaigns include Facebook or Instagram Lives, themed content, or a Reddit “Ask Me Anything.” For each campaign, the EEOC should create a plan that outlines the details of the campaign, including how executing the campaign fits into the EEOC’s social media objectives, the planned approach to the campaign, and a method for evaluating performance that includes specific measures as well as proposed benchmarks for those measures. The plan should also include a timeline for execution and content (if appropriate).

Measurement

The EEOC measures its social media program through the compilation of high-level metrics for OCLA channels. The cadence and structure of social media reporting limited the EEOC’s opportunities to uncover helpful data that could improve its social media program. Specifically, the reporting did not include:

- **Metrics from field offices.** Field offices make up the majority of the EEOC’s social media channels. Failing to include those channels’ outcomes in reporting—a result of the decentralization of the social media program—prevents the EEOC from understanding the channels’ impact and may serve to reduce the perceived impact of the social media program through under-reporting of outcomes. Additionally, including these metrics in reporting could provide insight into field offices that may require assistance in improving social media performance.

- **Targets for the metrics.** Strong social media programs have measurable, quantifiable goals that tie back to the objectives of the program. For example, a social media program focused on raising awareness would set a goal of increasing its social media impressions by X% year-over-year. That the EEOC does not map its social media objectives to quantified, measurable outcomes or track success against those outcomes means that the EEOC does not have a way of saying, “Is our social media program successful?” because there is no agreed-upon metric for what success looks like.

- **Ongoing frequent reporting**, such as quarterly or monthly, against the measurable outcome targets. This helps ensure organizations are on track to meet the outcomes.

- **Detailed social media metrics** (e.g., comments received) or analysis, which can provide critical insight on what content performs best and how to improve low-performing social
media content. Conducting detailed analysis frequently allows for more nuance in understanding what increases social media performance.

The limited reporting prevents the EEOC from having the opportunity to adjust and enhance strategy and content output periodically, based on performance, to ensure that EEOC meets or exceeds its program objectives and goals. It also prevents staff from developing a comprehensive rationale for why the organization should invest greater resources into its social media program.

**RECOMMENDATIONS**

14. *Establish objectives for the social media program that include quantified targets.* To develop the targets, the EEOC should review past performance from the previous two years and project for the following year, accounting for planned EEOC activities, changes in social media platforms, etc. Setting targets will build consensus as to how to measure success and better enable the EEOC to push for growth in performance that allows it to meet its objectives.

15. *Begin quarterly reporting on social media outcomes—using an online dashboard to ease data collection—to ensure the EEOC is on track to meet targets and can adjust social media approach based on performance.* At a minimum, the specific metrics should include:

- Impressions
- Engagement metrics (likes, clicks, shares)
- Engagement rate
- Click-through rate
- Website metrics (social media network referrals)

The EEOC should strongly consider conducting additional reporting following the conclusion of specific campaigns, looking at similar metrics as well as the performance of the social media content.

The quarterly reporting should include total outcomes across all EEOC social media channels (OCLA, OFO, and field offices), and display a breakdown by channel and by office. Social media managers should review the metrics at ongoing social media team meetings, so that all staff involved in the program understand how their performance contributes to the success of the EEOC social media program.
To ease data collection, Hager Sharp recommends the EEOC use an online, third-party dashboard to compile metrics. Online dashboards automate the collection of data across multiple digital channels. Once setup, an online dashboard allows for easy reporting, since the online interface enables the date ranges and channels to be easily changed. The dashboard can be configured to display metrics by channel, by office, and across all EEOC properties, allowing the EEOC to see, at a glance, its social media program impact. While the metrics can be compiled without the use of an online dashboard, it would take at least 1–3 hours of each social media manager’s time—plus an additional 10–15 hours from the person compiling the data—to compile and visualize the data manually. Manually compiling and visualizing the data also limits the analysis that EEOC can complete, since each revision to how the data is analyzed requires manual calculations and additional time burden on staff. In these ways, using an online dashboard reduces the burden for collecting the data across many data sources.
A Final Thought

With the crowded, competitive, and ever-changing social media landscape, completing this evaluation—and implementing its recommendations—will help the EEOC develop an effective and efficient path forward that helps it achieve its social media objectives while staying nimble to current events that change information needs. Hager Sharp is honored to deliver the findings, conclusions, and recommendations to inform improvements in the EEOC social media program. Thank you for this opportunity.
Glossary of Terms
## Appendix A: Glossary of Terms

<table>
<thead>
<tr>
<th>KEY TERM</th>
<th>DEFINITION</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>IMPRESSIONS</strong></td>
<td>The number of times content is viewed.</td>
</tr>
<tr>
<td><strong>ENGAGEMENTS</strong></td>
<td>The number of times viewers of social media content engaged with the content. This includes retweets/shares, comments, likes, and link clicks, among others.</td>
</tr>
<tr>
<td><strong>ENGAGEMENT RATE</strong></td>
<td>The number of engagements received on content, divided by the number of impressions, expressed as a percentage.</td>
</tr>
<tr>
<td><strong>CLICK-THROUGH RATE (CTR)</strong></td>
<td>The number of link clicks received on content, divided by the number of impressions, expressed as a percentage.</td>
</tr>
<tr>
<td><strong>LANDING PAGE</strong></td>
<td>A landing page is the first page a web visitor “lands on” after clicking a link.</td>
</tr>
<tr>
<td><strong>SOCIAL MEDIA REFERRALS</strong></td>
<td>Website traffic that originates via social media.</td>
</tr>
</tbody>
</table>
MEMORANDUM

TO: Milton A. Mayo, Jr.
Inspector General
Joyce Willoughby
Acting Deputy Inspector General

FROM: Jacinta Ma
Director, Office of Communications and Legislative Affairs

DATE: June 11, 2021

SUBJECT: Response to Draft Report: “Evaluation of EEOC’s Social Media Program (OIG Report Number 2020-001-EOIG)”

Thank you for the opportunity to review and comment on the draft report “Evaluation of EEOC’s Social Media Program.” We appreciate the review and recommendations for improving the EEOC’s social media activities. Given that social media is an integral part of modern communications, we recognize the need to ensure that our social media activities are as effective as possible. We have attached a specific response to each of the 15 recommendations and believe that implementing these recommendations will improve the EEOC’s social media and can help to advance our agency’s mission.

We would like to request clarification on two parts of the report. The report states on pages 18-19, “The EEOC provided one social media campaign plan to Hager Sharp for review, the Small Business Monday LinkedIn campaign plan, which indicates that campaign planning is not commonplace within the EEOC social media program,” giving the impression that the EEOC only ran one social media campaign during the entire period of review, October 1, 2018 to September 30, 2020. However, the EEOC conducted five social media campaigns during that time period and was only asked to provide an example of a social media campaign to Hager Sharp. OCLA was not asked to provide an itemization of all social media campaigns.

Additionally, on page 30, the report states, “The EEOC measures its social media program yearly, compiling high-level metrics for OCLA channels.” OCLA, however, compiles metrics for its social media channels monthly. Also, it would be helpful for the report to add some language providing additional context explaining the EEOC’s decentralized structure and that many of the other users of social media at the EEOC report to OFP and OFO explaining why OCLA does not collect metrics across the agency.
We are already beginning to implement some of these recommendations and are eager to develop and implement a plan of action to improve EEOC’s social media presence. If you have any questions, please feel free to contact me or Brett Brenner, Associate Director.

cc: Charlotte A. Burrows, Chair  
Martin Ebel, Director, Office of Field Operations  
Carlton M. Hadden, Director, Office of Federal Operations  
Mona Papillon, Acting Chief Operating Officer  
Elizabeth Fox-Solomon, Chief of Staff  
Brett Brenner, Associate Director, Office of Communications and Legislative Affairs  
Elisa Krobot, Chief Financial Officer  
Donnie Landon, Director, Central Services Division  
Larkin K. Jennings, Supervisory Evaluator, Office of Inspector General
1. **Hire people with specialized expertise to manage the social media program and its assets, specifically a dedicated social media manager and part-time (or contract) graphic designer and multimedia specialist.**

Concur, subject to the availability of appropriations. The EEOC social media program has grown to more than 20 accounts nationwide. Social media management and graphic design are highly desirable and specialized skills needed to support a robust social media program. A dedicated social media manager can focus on strategy to ensure that content aligns with agency goals and is delivered in a consistent manner. A full or part-time graphics and multimedia content producer will help ensure that EEOC’s social media content is current, professional and designed to maximize engagement.

2. **Simplify the EEOC’s social media architecture by consolidating many of the existing social media channels and limiting creation of new channels.**

Concur. Far too many social media accounts linked to EEOC sit inactive or are used too infrequently to be effective. Distinct social media channels, however, are useful to share news and create awareness of the unique products, services and opportunities available to the public and EEOC partners. Accounts that are successfully targeting specific audiences, for example Spanish readers and federal employees, should continue. The EEOC should develop a process to determine which social media channels should be consolidated and whether a new channel should be created.

3. **Ensure all social media managers have access to the same scheduling tool within one account.**

Concur. A social media scheduling tool that is available to all social media managers will be useful. OCLA is currently evaluating whether it should adopt the Agorapulse scheduling platform currently used by field and federal operations staff. The tool that the EEOC adopts should have the functionality to restrict which users have permissions to approve, modify, or remove scheduled posts.

4. **Implement a consistent content approval process run by OCLA.**

Concur. Ensuring consistency of messaging and quality of content is important for any government agency. The EEOC would benefit from a set of standard operating procedures for determining what type of content should be approved by OCLA staff and what type of content individuals have discretion to post on social media. A content approval process run by OCLA must be nimble, flexible, and timely so that it can be
responsive to the needs of social media that is planned in advance, but also that needs to be issued due to quickly changing circumstances.

5. **Facilitate a mandatory meeting among all EEOC social media managers.**

Concur. Some of the Outreach and Education Coordinators and a Public Affairs Specialist in OCLA already meet monthly to discuss developing evergreen social media content. It has been viewed as a great opportunity for information exchange. We will consider expanding the membership and purpose of this group (perhaps calling it a Social Media Council) to address this recommendation. This group could work with OCLA to identify social media campaigns centered around strategic priorities, discuss current social media strategy, exchange information, share best practices, and receive guidance from OCLA.

6. **Implement an ongoing training series for all staff involved in the EEOC social media program.**

Concur. Staff could benefit from a structured training program that lays out the EEOC’s vision and purpose for its social media program followed by discreet training on the use and benefits of each platform and how to host and facilitate different types of events on social media. These trainings could be similar to the *EEOC Digital Communications—Evergreen Content* and *EEOC Digital Communications Guide—A Review* webinar-style trainings developed and conducted by OCLA were well attended and well received by participants. The presentations were less than an hour and were intended to provide updated best practices not only related to digital communication but also federal government digital communications.

7. **Create and use an editorial calendar for social media content.**

Concur. OCLA and EEOC would benefit from implementing a formal editorial calendar for social media content that would allow the agency to better plan its future social media content.

8. **Develop content based on topics with strong performance and that uses social media best practices, including consistent branding for multimedia content and a greater number of videos.**

Concur. The EEOC would improve the reach of its social media posts with the addition of multimedia content and more videos. The EEOC should do more testing to better understand which content performs more strongly on which platforms and to which audiences. Additionally, EEOC staff should develop content that centers around current EEO news and events and, using the information learned about content performance, tailor the content appropriately to maximize reach.
9. **Employ new social media tactics to reach vulnerable audiences.**

Concur in part. The EEOC should employ social media tactics to improve its reach to vulnerable populations. Partnering with other groups to co-host live events or to promote EEOC content is one strategy for expanding our reach to vulnerable populations. The EEOC will need to assess and test different strategies to determine whether we are unable to reach vulnerable populations through our current social media channels or whether the current engagement strategies and messages are not yet attracting those populations.

10. **Execute new tactics on channels that generate traffic to EEOC web pages.**

Concur. Having improved analytics will allow us to better prioritize the social media channels that generate the most traffic so as to maximize potential website traffic.

11. **Use paid media to support improved reach and engagement.**

Concur with caveats. Using federal funds to promote events or raise awareness through paid social media advertising should be done with careful consideration and a specific planned objective and outcome. Granular targeting of demographic groups often used in paid social media advertising likely will not be appropriate because everyone needs to know about the laws we enforce and everyone falls into one or more protected categories. That said, some general paid advertising or geographically targeted paid advertising may be appropriate in some instances.

12. **Complete revisions to the social media handbook and provide to all staff managing social media channels.**

Concur. An update to the existing social media handbook is necessary. Additional updates to the handbook would need to occur after a dedicated Social Media Manager and Graphic Designer are hired. Updates to the social media handbook should take into account perspectives from OFO, OFP, and other offices using social media.

13. **Complete at least four social media campaigns per year (one per quarter) to prompt growth of social media channels and higher audience engagement.**

Concur. EEOC should continue to conduct social media campaigns. Annually, OCLA already conducts several campaigns a year often, with the support of Field Programs and OFO. At least four social media campaigns should be EEOC-wide but additional specific campaigns driven by federal sector and district office needs may be appropriate as well.

14. **Establish objectives for the social media program that include quantified targets.**

Concur. Establishing objectives and measurable targets will be helpful to improving the effectiveness of the EEOC’s social media. Measurable targets should be set around activities that are within the agency’s ability to control.
15. Begin quarterly reporting on social media outcomes—using an online dashboard to ease data collection—to ensure the EEOC is on track to meet targets and can adjust social media approach based on performance.

Concur. OCLA currently analyzes social media metrics monthly. Below are examples of the current OCLA data reports. Partnering with Field Programs on Agorapulse, OCLA can expand its analysis to more EEOC accounts and access additional metrics through the platform. EEOC should explore whether Agorapulse is sufficient for metrics analysis or whether adopting another tool is necessary.

<table>
<thead>
<tr>
<th>FY 2019</th>
<th>Twitter</th>
<th>Facebook</th>
<th>YouTube</th>
</tr>
</thead>
<tbody>
<tr>
<td>October</td>
<td>13,400 followers, 616 engagements, 286 clicks, 92k impressions</td>
<td>22,100 followers, 888 engagements, 286 clicks</td>
<td>2k engagement, 7k impressions</td>
</tr>
<tr>
<td>November</td>
<td>13,600 followers, 220 engagements, 410 clicks, 93k impressions</td>
<td>22,500 followers, 640 engagements, 290 clicks</td>
<td>816 engagement, 5.3k impressions</td>
</tr>
<tr>
<td>December</td>
<td>13,700 followers, 314 engagements, 633 clicks, 91k impressions</td>
<td>22,900 followers, 1k engagements, 486 clicks</td>
<td>992 engagement, 4.2k impressions</td>
</tr>
<tr>
<td>January</td>
<td>13,800 followers, 182 engagements, 207 clicks, 98k impressions</td>
<td>23,100 followers, 488 engagements, 207 clicks</td>
<td>808 engagement, 5.1k impressions</td>
</tr>
<tr>
<td>February</td>
<td>14,000 followers, 251 engagements, 966 clicks, 125k impressions</td>
<td>23,600 followers, 830 engagements, 951 clicks</td>
<td>724 engagement, 5.1k impressions</td>
</tr>
<tr>
<td>March</td>
<td>14260 followers, 328 engagements, 121 clicks, 123k impressions</td>
<td>24,300 followers, 1,510 engagements, 94 clicks</td>
<td>619 subscribers, 682 engagement, 6.6k impressions</td>
</tr>
<tr>
<td>April</td>
<td>14,400 followers, 360 engagements, 188 clicks, 155k impressions</td>
<td>24,700 followers, 1,100 engagements, 93 clicks</td>
<td>627 subscribers, 657 engagement, 4.8k impressions</td>
</tr>
<tr>
<td>May</td>
<td>14,500 followers, 290 engagements, 124 clicks, 150k impressions</td>
<td>25,150 followers, 700 engagements, 92 clicks</td>
<td>639 subscribers, 754 engagement, 4.9k impressions</td>
</tr>
<tr>
<td>June</td>
<td>14,670 followers, 221 engagements, 133k impressions</td>
<td>25,600 followers, 1,100 engagements</td>
<td>650 subscribers, 592 engagement, 4.2k impressions</td>
</tr>
<tr>
<td>July</td>
<td>15,400 followers, 723 engagements, 271k impressions</td>
<td>26,100, 1,200 engagements,</td>
<td>subscribers, 593 engagement, 5.7k impressions</td>
</tr>
<tr>
<td>August</td>
<td>15,600 followers, 300 engagements, 174k impressions</td>
<td>26,400, 1,200 engagements</td>
<td>subscribers, 693 engagement, 6.3k impressions</td>
</tr>
<tr>
<td>September</td>
<td>15,700 followers, 248 engagements, 68 clicks, 156k impressions</td>
<td>27,000 followers, 850 engagements, 36 clicks</td>
<td>662 subscribers, 768 engagement, 6.1k impressions</td>
</tr>
</tbody>
</table>
EEOC FY19 Digital Communications

**EEOC INCREASED DIGITAL COMMUNICATIONS REACH IN FY19 ACROSS ALL PLATFORMS.**

When compared to FY18, EEOC’s website visits, direct email communication and social media community all increased.

EEOC launched a new account on Instagram, a platform with 800M+ active users. The goal is to increase brand awareness and engagement with posts that focus on EEOC’s Youth@Work campaign, trainings, and other employee “how-to” information.

In May 2019, OCLA kicked-off a social media campaign targeting graduates and summer workers. The campaign resulted in more than 513 engagements (likes, comments, shares) and 24,300 impressions. The Youth@Work web page received 72k impressions, down from 121k in FY18.

EEOC re-launched a LinkedIn account with content targeting small businesses and HR professionals. Promotion of EEOC’s Small Business Resource Center (SBRC) resulted in over 11,000 impressions and 240 engagements. The SBRC received more than 54k visitors, up from 44k in FY18.

EEOC’s listserv subscribers increased by nearly 85,000 and the engagement rate of 40% exceeds the industry average.

**SOCIAL MEDIA ENGAGEMENT**

**SOCIAL MEDIA FOLLOWERS**

<table>
<thead>
<tr>
<th>Platform</th>
<th>Facebook</th>
<th>Twitter</th>
<th>LinkedIn</th>
<th>Instagram</th>
<th>YouTube</th>
</tr>
</thead>
<tbody>
<tr>
<td>FY19</td>
<td>30,000</td>
<td>20,000</td>
<td>10,000</td>
<td>2,500</td>
<td>0</td>
</tr>
<tr>
<td>FY19 increase</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

**EEOC.GOV**

There were 34,775,441 visitors to EEOC.gov, resulting in 96 million total page views. More than 10 million were unique visitors.

**SOCIAL MEDIA IMPRESSIONS AND SUBSCRIBERS**

<table>
<thead>
<tr>
<th>Platform</th>
<th>FY19 Impressions</th>
<th>FY18 Impressions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social Media</td>
<td>1.7M</td>
<td>1.7M</td>
</tr>
<tr>
<td>Email Subscribers</td>
<td>243K</td>
<td>158,190</td>
</tr>
</tbody>
</table>

**Organic Search** 63.1%

**Direct to EEOC.gov** 18.3%

**Link on Another Website** 17%

**Social Networks** 1.2%

**34M** there were 34,775,441 visitors to EEOC.gov, resulting in 96 million total page views. More than 10 million were unique visitors.

**ENGAGEMENT WITH EMAIL NEWS RELEASES RESULTING IN 2,160,000 IMPRESSIONS UP FROM 2,112,670 IN FY18.**

**40%**

Engagement with emailed news releases resulting in 2,160,000 impressions up from 2,112,670 in FY18.