
Managing Social Media Records Procedure

Directive No: CIO 2155-P-06.1

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19, dated 07/07/2005*

Managing Social Media Records Procedure

1. PURPOSE

To establish a framework for properly maintaining social media records related to official agency business.

2. SCOPE

The procedure applies to EPA employees, contractors, and other personnel acting in an official capacity on behalf of EPA when using social media for official EPA purposes on the Intranet or Internet, whether such use occurs on an EPA website or on third-party sites to which EPA contributes input.

3. AUDIENCE

The audience for these procedures includes any EPA employee, contractor, or other person who uses social media on behalf of EPA.

4. BACKGROUND

The term "social media" refers to Web-based networks and platforms that are accessed by both desktop and mobile devices to share information and interact online. Social media provides unique opportunities for enhancing innovation, cooperation and self-expression and offers exciting possibilities for government agencies to communicate and collaborate with the public. Social media can inspire problem solving and bring creative minds together that might otherwise never connect.

EPA is using social media networks and tools in the firm belief that by sharing and experimenting with information we greatly increase the potential for everyone to gain a better understanding of environmental conditions and solutions. At the same time, EPA also makes every effort to comply with important Agency obligations related to transparency, public access, and personal privacy, among other responsibilities. EPA does not endorse any particular social media site or technique.

Employees must abide by the Standards of Ethical Conduct, the Hatch Act, and the Agency's other posted policies and procedures that apply to the use of social media for official Agency business.

Only EPA employees and EPA contractors (under the direct supervision of EPA employees) are permitted to post to agency social media accounts. Student interns, fellows, and SEE enrollees are not authorized to post to agency social media accounts.

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For specific guidance on using social media in an official capacity to communicate to EPA staff or the public, view the policies and procedures for Using Social Media at EPA or the Social Media Resources webpages for additional information.

5. AUTHORITY

44 U.S.C Chapter 31 Records Management by Federal Agencies

6. PROCEDURE

The laws, regulations and policies that govern proper records management (i.e., creation, maintenance/use and disposition) apply when using social media. EPA's records schedules are media neutral -- that is, they apply to any form of record (e.g., in hardcopy paper, computer disc, audio recording, social media, etc.). See <http://intranet.epa.gov/records/schedule/index.htm>.

All EPA records subject to the Federal Records Act are required to be covered by a records schedule. For social media records the following information is helpful.

- A. Content created with social media tools qualifies as a federal record and must be captured and maintained in a recordkeeping system according to the current version of EPA's Records Management Policy: <https://www.epa.gov/sites/production/files/2018-09/documents/interim-records-mgmt-policy-20180822.pdf>.
- B. Additional information added to or appended to social media content constitutes a new record which must be saved in a recordkeeping system.
- C. The Records Liaison Officer and the National Records Management Program Help Desk (See <http://intranet.epa.gov/records/about.htm>) can help determine the most appropriate methods to capture and maintain records.
- D. Social media records preserved in accordance with this procedure may be responsive to a request under the Freedom of Information Act (FOIA).

Social media records that qualify as "federal records," as defined below, must be maintained and preserved in an approved recordkeeping system such as the Enterprise Content Management System (ECMS) in the same manner as any other federal record.

Recordkeeping systems can house paper records (which can be digitized and saved electronically) or electronic records, but the main principles are the same. Temporary records whose retention is transitory or short-term may not need to be captured and can be maintained in the social media platform. Agencies should access their business needs and evaluate risks associated with leaving these records in social media. Capture is important for temporary records with long-term retentions or for permanent records. These should be exported from the social media platform into the agency recordkeeping system.

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Methods to capture social media records include:

- Using web crawling or other software to create local versions of sites;
- Using web capture tools to capture social media;
- Using platform specific application programming interfaces (APIs) to pull content;
- Using RSS Feeds, aggregators, or manual methods to capture content; and
- Using tools built into some social media platforms to export content.

The options for successful social media capture will depend on the technical configuration of a social media platform. Agency needs may also affect which social media capture method is used. Once the agency determines the capture method, they must provide training to applicable staff on how and when to use capture tools for social media.

Agencies may need to work with third-party providers to implement social media capture.

EPA provides the following electronic records management tools for saving records into:

- EZ Email Records
(<https://usepa.sharepoint.com/sites/oei/ermd/ECMS/SitePages/EZ-Email-Records.aspx>)
- EZ Desktop Records
(<https://usepa.sharepoint.com/sites/oei/ermd/ECMS/SitePages/EZ-Desktop-Records.aspx>)

NOTE: Agency policy is to not delete any social media activity, social media posts, or social media comments made by the Agency on a third party or EPA-hosted social media sites. See above for ways to save these social media records. Comments made by users on Agency posts that violate EPA's comment policy should be hidden from view and saved as part of the social media record (<https://www.epa.gov/web-policies-and-procedures/epa-comment-policy>).

When using social media Web 2.0/social media platforms, the following non-exhaustive list of questions may help determine record status:

- Is the information unique and not available anywhere else?
- Does it contain evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the federal government or have some other informational value?
- Is there a business need for the information?
- Does the Agency use the tool to convey official agency information?

If the answer to any of the questions is "yes," then the content should be treated as a federal record. Social media content should also be considered a Federal record when the use of social media provides added functionality such as enhanced searchability, opportunities for public comment, or other collaboration.

All social media accounts and information posted to them are unique and need to be saved as Agency records.

NARA provides information on how to save social media records. See NARA Bulletin 2014-02, *Guidance on Managing Social Media Records* at

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<https://www.archives.gov/records-mgmt/bulletins/2014/2014-02.html>, and NARA Bulletin 2015-02, *Guidance on Managing Electronic Messages* at <https://www.archives.gov/records-mgmt/bulletins/2015/2015-02.html>

7. ROLES AND RESPONSIBILITIES

The Chief Information Officer, Office of Mission Support (OMS), and the Associate Administrator, Office of Public Affairs (OPA), are jointly responsible for maintaining this document and monitoring compliance with this procedure.

All employees who are responsible for managing EPA social media accounts are responsible for being familiar and complying with this document.

All managers who supervise employees managing EPA social media accounts are responsible for ensuring that their employees have the tools and training necessary to understand and comply with this procedure.

Records Liaison Officers and the National Records Management Program Help Desk (See <http://intranet.epa.gov/records/about.htm>) can help determine the most appropriate methods to capture and maintain records.

8. RELATED INFORMATION

- CIO Policy 2184.0: Social Media Policy (June 20, 2011), https://www.epa.gov/sites/production/files/2013-11/documents/social_media_policy.pdf
- CIO Procedure 2184.0-P02.1: Using Social Media to Communicate with the Public, https://www.epa.gov/sites/production/files/2013-11/documents/comm_public.pdf
- All design requirements for public access EPA webpages (www.epa.gov) are found at <https://www.epa.gov/webguide>
- Best practices and general information about EPA and social media can be found on EPA's Web Guide at <https://www.epa.gov/webguide/social-media-resources>
- All Office of Mission Support (OMS) Information Technology and Information Management (IT/IM) policies are located at <https://www.epa.gov/irmpoli8/current-information-directives>

EPA's administrative policies issued through the Office of Mission Support Directives Clearance Review Process are located at <http://intranet.epa.gov/policy/index.htm>

- CIO Policy 2155.4: Interim Records Management Policy, <https://www.epa.gov/sites/production/files/2018-09/documents/interim-records-mgmt-policy-20180822.pdf>
 - NARA Bulletin 2014-02, *Guidance on Managing Social Media Records*, October 25, 2013, <http://www.archives.gov/records-mgmt/bulletins/2014/2014-02.html>
 - NARA White Paper on Best Practices for the Capture of Social Media Records, May 2013, <http://www.archives.gov/records-mgmt/resources/socialmediacapture.pdf>
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9. DEFINITIONS

- **Record** – all recorded information, regardless of physical form or characteristics, made or received by an agency of the United States government under federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the government or because of the informational value of data in them. ([44 U.S.C. 3301](#))
- **Records Management** – the planning, controlling, directing, organizing, training, promoting, and other managerial activities involved with respect to records creation, records maintenance and use, and records disposition in order to achieve adequate and proper documentation of the policies and transactions of the federal government and effective and economical management of agency operations. ([44 U.S.C. 2901\(2\)](#))
- **Recordkeeping Requirements** – the identification and prescription of specific categories of documentary materials to be systematically created or received and maintained by Agency personnel in the course of their official duties; prescription of the use of materials and recording techniques that ensure the preservation of records as long as they are needed by the government; prescription of the manner in which these materials shall be maintained wherever held; and the distinguishing of records from non-record materials and, with the approval of the Archivist of the United States, the prescription of action for the final disposition of agency records when they are no longer needed for current business. ([36 CFR 1222.30](#))
- **Social Media** – Web 2.0/Social Media Platforms, with the term social media referring to the various activities integrating web technology, social interaction, and user-generated content. Social media includes blogs, wikis, social networks, photo libraries, virtual worlds, location-based services, and video sharing sites. Agencies use social media internally and externally to share information, support business processes, and connect people to government.
- **Third Party Website** – for purposes of this procedure, any website that is not owned, operated or cosponsored by EPA. This refers to sites as a whole; EPA accounts on such sites are still considered to be third-party sites, even though EPA controls the content of those accounts.

10. WAIVERS

None.

11. MATERIAL SUPERSEDEDCIO 2155-P-06.0: Managing Social Media Records, June 12, 2015

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12. CONTACTS

For further information about this procedure, please contact the National Records Management Program or the Office of Web Communications, in the Office of Public Affairs.

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and Chief Information Officer
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