
Managing Social Media Records	
EPA Classification No.: CIO 2155-P-06.0	CIO Approval Date: 06/12/2015
CIO Transmittal No.: 15-006	Review Date: 06/12/2018

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

MANAGING SOCIAL MEDIA RECORDS

1. PURPOSE

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

2. SCOPE AND APPLICABILITY

The procedure applies to EPA employees, contractors, and other personnel acting in an official capacity on behalf of EPA when using social media on the EPA 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 provide unique opportunities for enhancing innovation, cooperation and self-expression and offer 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.

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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. New content created with social media tools qualifying as a federal record must be captured and maintained in a recordkeeping system according to EPA's Records Management Policy (<http://www.epa.gov/records/policy/>).
- B. If identical content in a social media tool has already been captured and preserved as a record in another medium, then the content in the social media tool does not need to be captured and preserved again. However, if additional information is appended to the social media content, then it may constitute 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 above, must be maintained and preserved in an approved recordkeeping system in the same manner as any other federal record. Options for retaining social media records include:

- Saving in a shared drive,
- Saving in ECMS, and
- Taking screenshots and saving in a word processing package.

Social media records must then be maintained in an approved recordkeeping system.

Recordkeeping systems can house paper records (which can be digitized and saved electronically) or electronic records, but the main principles are the same.

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Currently EPA provides the following electronic records management tools:

- EZ Email Records and Advanced Email Records
- CMS Correspondence Records
- Electronic Grants Records System (EGRS)
- Electronic Records for Interagency Agreements (ERIA)
- Extender for Superfund Email Records
- Personnel Security Module (PSM)
- Science and Technical Information Clearance System (STICS)

EPA is currently developing an EZ Desktop Records tool, which will provide another mechanism for saving electronic documents.

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 that violate EPA's comment policy, should be removed (<http://epa.gov/epahome/commentpolicy.html>).

When using 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?

If the answer to any of the questions is "yes," then the content is likely to be a federal record. NARA provides information on how to save social media records. See NARA Bulletin 2014-02, *Guidance on Managing Social Media Records* (<http://www.archives.gov/records-mgmt/bulletins/2014/2014-02.html>).

See also Appendices A and B of these Procedures for guidance on determining whether social media entries are unique and need to be save as Agency records.

7. RELATED DOCUMENTS

- CIO Policy 2184.0: Social Media Policy (June 20, 2011) and other social media policies and guidance.
 - CIO 2184.0-P02.1: Procedures for Using Social Media to Communicate with the Public, http://www.epa.gov/irmpoli8/policies/comm_public.pdf.
 - EPA Records Management Manual, 2007, <http://www.epa.gov/records/policy/manual/index.htm>
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8. ROLES AND RESPONSIBILITIES

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The Chief Information Officer, Office of Environmental Information, and the Associate Administrator, the Office of Public Affairs, 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.

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** – any online tool or application that not only provides information, but also enables collaboration, interaction, and sharing of information between network or platform users. Examples of social media include: blogs; microblogs; wikis; photo and video sharing; podcasts; virtual worlds; social networking sites; social news and bookmarking; and Web conferencing and webcasting.
- **Web 2.0** - A Web 2.0 site may allow users to interact and collaborate with each other in a social media dialogue as creators of user-generated content in a virtual community, in contrast to Web sites where people are limited to the passive viewing of content. Examples of Web 2.0 include social networking sites, blogs, wikis, folksonomies, video sharing sites, hosted services, Web applications, and mashups.

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- **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. RELATED PROCEDURES, STANDARDS AND GUIDANCE

- All design requirements for public access EPA webpages (www.epa.gov) are found at <http://www2.epa.gov/webguide>.
- Best practices and general information about EPA and social media can be found on EPA's Web Guide at <http://www2.epa.gov/webguide/policies-and-procedures#social>.
- All Office of Environmental Information (OEI) Information Management and Information Technology (IM/IT) policies are located at <http://intranet.epa.gov/oei/imitpolicy/policies.htm>.
- EPA's administrative policies issued through the Office of Administration and Resources Management (OARM) Directives Clearance Review Process are located at <http://intranet.epa.gov/policy/index.htm>.
- EPA's Records Management Policy, <http://www.epa.gov/records/policy/index.htm>.
- 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>.

12. MATERIAL SUPERSEDED

Not applicable.

13. ADDITIONAL INFORMATION

For further information about these procedures, please contact the Agency Records Officer and Social Media Lead.

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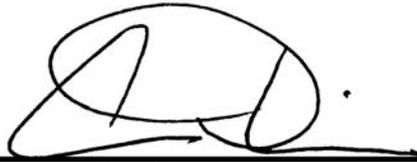
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APPENDIX A

MANAGING SOCIAL MEDIA RECORDS GUIDANCE

When determining if an alternative version of a social media page (e.g., within a different medium) is a separate record or identical in content and format to a page already preserved as an official EPA record, consider:

- Are there any unique textual details, graphics, hyperlinks or other online functionality differences between the Web page and alternative versions?
 - If the content and format of the Web page representing it are unique or different, the alternative version of the webpage should be independently preserved as a federal record.
 - Refer to the "IS THIS A COPY?" table below to determine whether an element is unique or a copy.

IS THIS A COPY?	
See below for a sampling of typical elements that may be relevant toward determining if a social media product is a unique record requiring preservation under a record schedule or, alternatively, a "copy" that does not require such preservation. This list is not exclusive. If you have a question, please contact your Records Liaison Officer or the Agency's Social Media Lead.	
Not a Record	Yes, a Record
Fixing a typo	Adding a new question to a post
Changing the color or formatting of the font	Adding a new hyperlink
Updating hyperlink or fixing a dead link	Responding to questions or comments from the public
Fixing formatting of a photo, graphical element, or multimedia element (for example, centering it in a blog post or adjusting its display size)	Posting questions or comments intended to engage the public
	Adding a photo or other graphical element
	Editing text, other than fixing a typo
	Adding text to a post
	Adding multimedia elements to a post
	Adding or updating a sound recording

**APPENDIX B
Social Media Records
Flow Chart**

