

Best Practices Study of Social Media Records Policies

**ACT-IAC Collaboration & Transformation (C&T)
Shared Interest Group (SIG)
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The purpose of this study is to build a discussion around the use of Web 2.0 collaborative technologies, also known as social media, to help government and its citizens connect more closely, collaboratively, and openly. The study involved interviews at 10 agencies regarding records management processes addressing the use of social media. The C&T SIG sought to explore and capture government best practices of retention policies for social media used to support agency missions.

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Executive Summary

Government agencies are increasingly incorporating Web 2.0 collaborative technologies, also known as social media, such as wikis and blogs, in conducting agency business. Federal recordkeeping requirements include developing and implementing policies for Federal records and cover records from social media.

The purpose of this study is to build a discussion around the use of social media to help government and its citizens connect more closely, collaboratively, and openly. The study involved interviews at 10 agencies regarding records management processes addressing the use of social media. The ACT-IAC Collaboration & Transformation Shared Interest Group (C&T SIG) sought to explore and identify government best practices of records policies for social media used to support agency missions. The team found that active use of social media tools has identified some challenges for recordkeeping, but also has allowed some best practices to surface which agencies are following or need to follow to address the challenges.

The Government Advisory Panel (GAP) of the C&T SIG had discussions on Federal agency challenges in adopting Web 2.0 -- social media. The SIG has undertaken this study, sponsored by the GAP and the National Archives and Records Administration (NARA), in particular, to engage subject matter experts from industry, as well as stakeholders within the government, in exploring agency policies regarding records management processes challenged by this new media use.

Most of the interviewed agencies use a majority of the commercially available social media tools and techniques to support their efforts.

Participating Agencies

- DC Government (DC)
- Department of Agriculture, Food and Nutrition Service (USDA, FNS)
- Department of Defense, Office of the Secretary (DOD)
- Department of Health and Human Services (HHS)
- Department of Interior, U.S. Geological Survey (DOI, USGS)
- Environmental Protection Agency (EPA)
- Government Accountability Office (GAO)
- National Aeronautics and Space Administration (NASA)
- National Archives and Records Administration (NARA)
- Nuclear Regulatory Commission (NRC)

Challenges from the Interviews

- Challenge #1 -- Declaration: What is a social media record? Social media content is difficult to define as a record. Agencies are still grappling with records management for email, much less wikis and blogs. Somehow the social media content that is record material must be identified as such by system users if there is no automation support for records identification (largely absent from current social media applications). Social media systems do not generally lend themselves to handling system content as business records that may require separate handling and application of business rules.

- Challenge #2 -- Social Media Capture: The second challenge is that much of the social media content is in the public domain and, therefore, not under control of the agency causing difficulty in capturing content.
- Challenge #3 -- Social Media Metadata: Applying metadata to tag social media content for retrieval is difficult. Currently, all agencies interviewed are using manual methods of adding metadata for social media content.
- Challenge #4 -- Social Media Scheduling/ Disposition: As in Challenge #2, the lack of control of the content makes scheduling and disposition of records difficult.
- Challenge #5 -- Staffing and Education: Education is needed to implement a successful social media records policy.

Best Practices from the Interviews

- Best Practice #1 -- Develop communications between social media team and records management: An active team should include records management staff, web managers, social media managers, information technology staff, and perhaps other relevant stakeholders is needed.
- Best Practice #2 -- Develop social media policies making use of resources for help: Agencies use multiple information resources when creating policy and implementing processes that model best practices in the use of social media with respect to recordkeeping.
- Best Practice #3 -- Define roles and responsibilities: A cross-organizational unit whose primary role is to aid in understanding and guiding agencies in the use of social media and records implications must include identification of roles and responsibilities.
- Best Practice #4 -- Implement records management for social media as part of enterprise content management: An enterprise content management system (ECMS) for records management should include social media and should have requirements for capturing, tagging with metadata, and scheduling the content.

Recommendations

- **Call to Vendors:** The agencies are looking to the vendor community to provide the government the capability to configure the client or server to capture social media records without user intervention. A second suggestion is to provide a back-end solution where social media records are automatically tagged with metadata.
- **Call to NARA:** The agencies are looking to NARA for assistance in addressing the existing dilemma of social media records. The recent release of NARA Bulletin 2011-02 on Guidance on Managing Records in Web 2.0/Social Media Platforms is a big step in NARA providing assistance to agencies.

Conclusions

When asked what they wanted in an ideal world, all agencies responded that they wanted a system which provides automatic metadata and content capture without human intervention. This would consist of an automated mechanism to identify, tag, create the metadata, and associate the data with the proper records schedule.

Introduction

Purpose

The purpose of this study is to build a discussion around the use of Web 2.0 collaborative technologies, also known as social media, to help government and its citizens connect more closely, collaboratively, and openly. The study involved interviews at 10 agencies regarding records management processes addressing the use of social media. The ACT-IAC Collaboration & Transformation Shared Interest Group (C&T SIG) has sought to explore and capture government best practices of records policies for social media used to support agency missions.

Background

President Obama issued a memorandum on January 21, 2009, which called for all Federal Agencies to facilitate “transparency, public participation, and collaboration.”¹ (A list of citations follows the report and Appendix A includes a Reading List of policies, guidance, and reports which relate to the goal of this project.) This encouraged agencies to use innovative tools to reach new audiences. OMB followed in December 2009 with the Open Government Directive which directed the implementation of the President’s memorandum.² In April 2010, OMB issued guidance on the use of social media in support of the Open Government Directive.³ This Guidance establishes the baseline for best practices being developed and implemented by many agencies. Specifically, OMB stated that the Guidance Memorandum defined “...that certain uses of social media and web-based interactive technologies [would] be treated as equivalent to activities that are currently excluded from the Paperwork Reduction Act.” It further clarified that the guidance applied to information shared both on .gov sites as well as on any third-party site such as Facebook or Twitter.

Social media includes a large number of technologies that have become available on the Internet to facilitate collaboration and sharing -- also known as Web 2.0 technologies, indicating the second wave of the Internet. Social media defines activities that integrate technology, social interaction, and content creation. Social media tools use "crowd sourcing" to collaboratively connect online information. Through social media, agencies can create, organize, edit, comment on, combine, and share online content. The use of social media in government and in 9 of the 10 agencies interviewed is seen as incredibly valuable and useful and currently supplement and improves the day-to-day informational and transactional needs of the public.

The prevalence of social media use by government agencies has caused a need to look at the records management implications of information content created or received in social media applications by Federal agencies. The social media applications are a new breed of authoring, transmission, and delivery tools for information content that, if it meets the definition of a Federal record, is indeed a Federal record. Federal agencies must treat content created and received in social media applications as they would any other agency content – as potential Federal records. The requirements of the Federal Records Act (44 U.S.C. Chapter 31)⁴ and NARA regulations affecting Federal agencies and their records management programs (Subchapter B of 36 Code of Federal Regulations Chapter XII)⁵ are clear that a record is a record regardless of physical form or characteristics, if it meets record criteria (as paraphrased from the Federal Records Act):

- 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 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.

Agencies must determine what social media content is a record, capture the content that is a record in a recordkeeping system, and disposition (delete or transfer to NARA) the content that is determined to be record material, in compliance with NARA requirements. This all must be done in the context of technologies that have not been designed to enable or facilitate handling of their information content as Federal records. Clearly, this new platform presents some unique challenges to Federal Records Officers, as discussed in the sections that follow.

Government Interest and Leadership

The Government Advisory Panel (GAP) of the C&T SIG had discussions on Federal agency challenges in adopting Web 2.0 -- social media. The SIG has undertaken this study, sponsored by the GAP and the National Archives and Records Administration (NARA), in particular, to engage subject matter experts from industry, as well as stakeholders within the government, to build forums of discussion around the use of Web 2.0 collaborative technologies known as social media to help government and its citizens connect more closely, collaboratively, and openly. There was a specific interest in exploring agency policies regarding records management processes challenged by this new media use. The GAP requested that the C&T SIG explore and capture government best practices of records policies for social media that are appropriate to agency mission. The Project Plan is attached as Appendix B.

Approach and Interviews

The C&T SIG Project Team conducted interviews from June to October 2010 of 10 government agencies using social media to further their services to citizens. The interviews involved the Executive and Legislative Branches of the Federal government and the DC Government. Each interview included several ACT-IAC interviewers and agency representatives -- when possible, the CIO and the Records Officer for each agency. Some interviews also involved the agency New Media Director and others recommended by the CIO. A standard set of questions was presented to each agency in a 60-minute interview (See Appendix C for the questions). The interviewed agencies included:

- DC Government (DC)
- Department of Agriculture, Food and Nutrition Service (USDA, FNS)
- Department of Defense, Office of the Secretary (DOD)
- Department of Health and Human Services (HHS)
- Department of Interior, U.S. Geological Survey (DOI, USGS)
- Environmental Protection Agency (EPA)
- Government Accountability Office (GAO)
- National Aeronautics and Space Administration (NASA)
- National Archives and Records Administration (NARA)
- Nuclear Regulatory Commission (NRC)

The goal the project was to identify best practices, lessons learned, and records policies that have been adopted and can be applied to other agencies.

Social Media Use

As with any new technology, adoption varies from organization to organization. And since social media comprises many different technologies under its umbrella definition, it has the chance to impact agency missions in many ways.

The early adopters in most agencies seem to be the public affairs and communications organizations that use social media as a means of communicating with constituents. HHS said it succinctly – social media is used for “getting information to the public and getting back feedback and comments.”

The adoption of social media was impacted by the Memorandum on Transparency and Open Government issued by President Obama in January 2009. Facebook and Twitter seem to be the most heavily used tools for external communication. EPA’s Administrator has her own Twitter and Facebook page, and USGS has a social media link on the homepage which leads to many Twitter feeds, as well as podcasts and a Facebook page. HHS uses Twitter to follow the activities of various other organizations to enable bi-directional communication with the health community. Blogs and wikis seem very prevalent as a means of improving collaboration within an agency. NARA is using IdeaScale as a platform for enabling communities and empowering innovation. And the Archivist of the United States has set up blogs at NARA to foster better collaboration and communication.

Establishing social media profiles to promote agencies through social media venues, such as Facebook, YouTube and Twitter, makes a lot of sense, especially as they relate to specific department missions and communication objectives. Some examples include:

Time sensitive alerts - Broadcast special alerts and emergency announcements.

- Federal Emergency Management Agency (FEMA) on Twitter
- Center for Disease Control on Twitter
- Department of Homeland Security on Twitter
- EPA widgets

Public relations - Proactively share success stories about the good activities.

- EPA on Twitter
- USGS on Twitter
- AIDS.gov on Twitter, Facebook, MySpace

Educational activities - Reaching out to enthusiasts and children to help inspire and educate.

- NASA on Twitter
- National Science Foundation (NSF) on Twitter
- USDA, Good Nutrition Blog

Customer Service - Twitter and Facebook allow for ease of customer service updates like office hours, government services, and deadlines.

- EPA
- Veterans Administration
- State Department
- DC Government

With the exception of NRC, the interviewed agencies use a majority of the types of commercially available social media tools and techniques (See Table 1 for details). NRC does not have an external presence for social media at this time and is spending effort on the context of social media and developing an enhanced policy around the context, as opposed to the application.

Social media is primarily used for directed (and perhaps secured) release of information for specific topics, news or program areas. Facebook and Twitter are the two most popular technologies for this purpose in the public domain, but, as public cloud applications, they do not provide security needed for certain agencies. For these secure needs, a private cloud is needed, such as for DOD applications.

DOD’s mission is to provide the military forces needed to deter war and to protect the security of our country, and social media is key to providing secure collaboration to achieve their mission. DOD sees these tools as a means of improving productivity and shortening the time for review and assessment which leads to better decision making. DOD heavily uses wikis (Intellipedia, DOD Technopedia), Jabber for collaborative chat, as well as Mashups and eChirp for situational awareness. It is also using blogs as a means of providing a secure communications channel between the troops and their leadership.

Table 1

Table 1: Social Media Used by Agencies	DC Govt	USDA, FNS	DOD	HHS	Dol, USGS	EPA	GAO	NASA	NARA	NRC
Blogs	X	X	X	X	X	X		X	X	
Microblogging , e.g., Twitter	X	X	X	X	X	X	X	X	X	
Mashups				X		X		X		
Photosharing, e.g., Flickr	X	X	X	X	X	X		X	X	
Podcasting		X		X	X	X	X	X		
Social Media Releases , e.g., Gov Gab birthday, PRs			X	X				X		
Social Networks, e.g., MySpace, Facebook, LinkedIn	X	X	X	X	X	X		X	X	
Web Chat (Live Support Software)			X					X		
Wikis, e.g., Wikipedia			X	X	X			X	X	
Video, e.g., YouTube	X	X	X	X	X	X	X	X	X	
Virtual Worlds, e.g., Second Life, Federal Consortium for Virtual Worlds (FCVW)			X	X				X		
RSS Feeds/Syndicated Web Feeds		X	X	X	X	X	X	X	X	
Widgets, Gadgets, badges	X	X	X	X		X		X		
Social News sites, e.g., social bookmarking			X	X				X		

Social Media Policy

As we asked about responsibility for records policies for social media, we discovered the challenges associated with implementing a mature discipline (records management) in the arena of new technology (social media). All agencies have specific policies for records management and retention in place. However, once we began to probe around policies for social media, we uncovered a grey area where there is often a challenge in establishing specific policies for recordkeeping.

NARA has a web site, Social Media and Web 2.0 at the National Archives (<http://www.archives.gov/social-media/>)⁶, which includes social media strategy, policies, service

agreements, as well as lists of NARA social media tools and sites. In particular, NARA issued policies for employees for commenting and posting on social media sites such as blogs, Facebook, wikis, and YouTube, as well as Interim Guidance 831-2 on Rules of Behavior for Using Web 2.0 and Social Media Web Sites and Responsibilities for Content Management (February 24, 2010)⁷ and the Web 2.0 and the Social Media Project Proposal form (February 4, 2010)⁸. These policies address assessing the record value of the content and the appropriate maintenance of any records.

HHS formed a web council a number of years ago. The HHS Assistant Secretary for Public Affairs (ASPA) is part of that council which issued a policy for web records policy and guidance on December 5, 2007. Currently this policy points to the general records schedules for the type of records that are formed and maintained for the sites, not the content, so there is no separate records disposition schedule either for the Office of Secretary or the other 10 operating divisions.

HHS has a well-developed site at the HHS Center for New Media (<http://www.newmedia.hhs.gov>)⁹. HHS issued a HHS-OCIO Policy for Social Media Technologies (Policy 2010-0003 – OCIO) on March 31, 2010¹⁰, that states that “Records management requirements for social media technologies are similar to any other information system and shall be in conformance with existing policy.” The Standards and Policies section of the Center for New Media has a standard on Record Keeping that states “the rules governing the maintenance of Federal records and web records cover records associated with the utilization of new media. The maintenance of these records, in either electronic or print format, is the responsibility of the office or agency originating the content.”

EPA participates in the Social Media Subcouncil operating under the Federal Web Managers Council. The Subcouncil uses a wiki (<http://govsocmed.pbworks.com>)¹¹ to engage the community at large in discussions and to research various topics. The wiki has a section where agencies can post social media policies. The Subcouncil posts final documents and research results to the social media section of Webcontent.gov (http://www.usa.gov/webcontent/technology/other_tech.shtml)¹² and one of the topics is Records Management.

EPA has a Web Council and publishes much of its policies and procedures in an outward facing Web Guide (<http://www.epa.gov/webguide>).¹³ EPA established a Social Media Council made up of representatives of social media, Web management, records management, communications, technology, and program offices. EPA has published several social media guidance documents to the wiki at <http://govsocmed.pbworks.com>, including “Interim Guidance for EPA Employees who are Representing EPA Online Using Social Media (2010)”¹⁴ which has the requirement to maintain records, when applicable. Other EPA guidance on the wiki covers a Comment policy, Twitter, Facebook, Widgets, Discussion Forums, and YouTube Channel. When finalized, EPA publishes its guidance documents to the outward-facing Web Guide and to intranet sites. The Social Media and Web 2.0 Tools section has a process for Setting Up Wikis and Blogs at EPA that includes under Records Management that “You are responsible for determining if your content on your wiki or blog is a record. Depending on the content, it may be a record. Work with your Records Liaison Officer to determine the appropriate methods to capture and maintain records.” EPA say records management applies to social media and they are working the specifics. They are doing what they can do to ensure that nothing gets destroyed that might be a record.

The Deputy Secretary of Defense issued Directive-Type Memorandum (DTM) 09-026 on Responsible and Effective Use of Internet-Based Capabilities¹⁵ to include social networking services. The Guidelines includes a section on Records Management stating “Internet-based capabilities used to transact

business are subject to records management policy... All users of these Internet-based capabilities must be aware of the potential record value of their content, including content that may originate outside the agency.”

The Chief Information Officer of the Department of the Navy issued a memorandum on Web 2.0 – Utilizing New Web Tools¹⁶ to provide guidance “for all Navy and Marine Corps commands on using web tools to facilitate collaboration and information sharing”; however the guidance does not explicitly address records management.

Challenges from Interviews

- Challenge #1 - Declaration: What is a social media record? Social Media content is difficult to define as a record. Agencies are still grappling with records management for email, much less wikis and blogs. Somehow the social media content that is record material must be identified as such by system users if there is no automation support for records identification (largely absent from current social media applications). Social media systems do not generally lend themselves to handling system content as business records that may require separate handling and application of business rules.
- Challenge #2 -- Social Media Capture : The second challenge is that much of the social media content is in the public domain and, therefore, not under control of the agency causing difficulty in capturing content.
- Challenge #3 -- Social Media Metadata : Applying metadata to tag social media content for retrieval is difficult. Currently, all agencies are using manual methods of adding metadata for social media content.
- Challenge #4 -- Social Media Scheduling/ Disposition: As in Challenge #2, the lack of control of the content makes scheduling and disposition of records difficult.
- Challenge #5 -- Staffing and Education: Education is needed to implement a successful social media records policy.

NARA and Social Media

Many of the agencies are looking for NARA to provide specific guidance on how to handle social media, and NARA has been pro-active in thinking about social media and the implications for records management. When this study began, existing NARA guidance on social media records included:

- NARA Guidance on Managing Web Records (January 2005)¹⁷
- Implications of Recent Web Technologies for NARA Web Guidance (2006, Updated) (<http://www.archives.gov/records-mgmt/initiatives/web-tech.html>)¹⁸ Updated periodically)

The Chief Digital Access Strategist in the Policy and Planning Staff (PPS) and the NARA Records Officer developed interim guidance in February 2010 on “Rules of Behavior for Using Web 2.0 and Social Media Web Sites and Responsibilities for Content Management” (Interim Guidance 831-2) primarily for internal use at NARA. The recent release of NARA Bulletin 2011-02 on Guidance on Managing Records in Web 2.0/Social Media Platforms¹⁹ is a big step in NARA providing assistance to agencies in managing social media records. This guidance addresses some of the records challenges of using social media.

NARA says that a record is a record regardless of the media, and many agencies consider that all records are media-neutral. But the user still has a challenge, since generally individuals often do not know or

care what a document is, as they are used to having records filing clerks. Records are ill-defined to them so they are not sure how to properly handle records. As with any new and evolving technology area, more dialogue is needed between NARA and the agencies, as well as separate discussion between the agency and its IT team. Each agency needs to develop a policy for records management and social media.

Social Media and Records Management Challenges

The challenges that were identified by agencies to implement and enforce records policies for social media range from helping agency users understand what content qualifies as record material to working with vendors and service providers to provide back-end solutions for tagging and preserving records generated from social media applications.

Challenge #1 -- Declaration: What is a Social Media Record?

The first challenge in dealing with social media is that its content is often difficult to define as a record or non-record. Agencies are still grappling with records management for e-mail, much less addressing wikis and blogs. Yet these are at least similar in nature to other unstructured content that agencies deal with as a record. With photos, videos, microblogs, instant messaging, and Mashups, there is a need to deal with multimedia formats which are not conducive to traditional records management.

Individual users of social media technology in agencies are generally left to determine what content they create or receive is record material. The social media applications do not provide functionality to programmatically identify which content is a record and to handle that content differently due to its record status. Dependence on a diverse group of individual users to identify social media records means that education is needed for an agency to equip these users to make informed decisions in this regard.

One resource for help in educating the social media user community is the October 20, 2010, NARA Bulletin 2011-02, Guidance on Managing Records in Web 2.0/Social Media Platforms. This bulletin was published during the writing of this report and although NARA had not yet seen these study results when the new bulletin was written, it directly addresses many of the issues raised by agencies during our data collection interviews. The fundamental issue raised by agencies that NARA addresses in the bulletin is an answer to the question: "What social media content is record material?" It will come as no surprise to Federal agencies that NARA's answer to this question is that social media content is a record, if it meets the definition of a record. The Federal Records Act (44 U.S.C. Chapter 31) and Subchapter B of 36 Code of Federal Regulations Chapter XII are clear that a record is a record, **regardless of physical form or characteristics**, if it meets record criteria:

- 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 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.

The principle is that record status is based on content and is independent of the medium. It would be simpler for agencies if there was a single, linear criterion of what makes content a record, but the bottom line is that agencies must determine which social media content they create and receive is record material and how to manage the content that they determine to be record material. The NARA Bulletin further makes the point that even non-record content is an agency asset that must be managed.

The NARA Bulletin provides a list of excellent questions agencies can use to help determine what social media content is a record, but, in the end, each agency must identify social media records for itself. Only the agencies know which social media tools are in use, what kind of content is being created and received using social media tools, where the content resides, which content is duplicated and where, which content set is more complete, which content set best enables capture and management of the content as records, and so on. NARA provides guidance on the desired end result (the “what”) but agencies must develop the processes and tools to implement requirements for social media records (the “how”).

The agencies that have made their records schedules “media neutral” (i.e. independent of the medium or form of the record) will benefit from having their schedules already applicable to their social media content. They still must determine which individual social media content items are or are not Federal records, but once this determination is made, they have “only” to capture the content in an agency recordkeeping system and apply the schedules.

Even after social media records have been identified, usually based on a human decision, the subsequent records management lifecycle phases continue to require human discipline and intervention given that the technology does not generally provide programmatic tools for categorization, capture, and disposition. Social media applications are generally not designed to handle some content differently because it is record material, and agencies must be creative in their techniques for preservation of social media records, as discussed in the following sections.

Challenge #2 -- Social Media Capture

The second challenge is how to manage social media content as records when the platform is in the public domain and therefore not under control of the agency. Facebook, Twitter, Flickr, YouTube, and other existing social media platforms are not able to provide individual agencies the ability to manage the information which they present to the public. EPA identified the example of information on Facebook not belonging to the agency, so that the agency has no control about how long information will be maintained. There are few options available to agencies to obtain support from these providers for government records management requirements, a problem which is discussed in the NARA Bulletin.

A number of the interviewed agencies already have or are in the process of implementing electronic records management systems. Except for GAO, most of these systems have not been implemented enterprise-wide, but rather are in selected business units in support of specific business problems. In these systems, most of the records capture is performed manually by end users; e.g., users in EPA declare email as a record for input to the ECMS. Most agencies are not yet capturing social media records, except what is already in an ECMS, such as agency videos going to YouTube. The NARA Bulletin suggests that agencies should “...evaluate which of the various components of a social networking profile, such as the profile itself, posts to the profile, and/or other interaction with the public should be retained as records.” This still places a burden on users to identify what constitutes the record, sometimes on a case-by-case basis, and generally requires users to manually tag such records.

More than one of the agencies interviewed for the study, including NARA, pointed out that it can be complicated to understand the boundaries of a social media record: the beginning and end of the record may not be obvious when the record isn’t a document or a discrete electronic file, such as a blog. Some social media content is in the form of threaded discussions often with no clear end point while the discussion is taking place.

The agencies also commented on the difficulty faced in capturing the context of social media records – when the social media tool in use is not owned or hosted by the agency. Background information, captured through automatic or manual tagging, enhances understanding of the business environment to which the record relates and is necessary for search and retrieval and for evidentiary purposes, when the records are used in litigation. Every agency interviewed commented on the high desirability of improved auto-tagging by service providers and vendors of social media tools to reduce the need for manual tagging.

Some agencies mentioned the difficulties created by having responsibility for collecting and maintaining records distributed among all staff. It is hard enough to get agency staff to care about records keeping at all and now there is a whole new set of social media platforms for creating and receiving records. Agencies commented on the fact that the tools to create and receive social media records generally do not enable or facilitate the capture of the content as record material. Even if they did, the necessity for capturing this kind of content as records is not widely understood or accepted by Federal employees. The weakest link of record keeping in the electronic age is the fact that everyone is his/her own record keeper. All agencies interviewed said it is difficult to enforce policies for capturing and tagging records of all kinds.

One approach to records capture is the ‘print and file’ approach, which is followed by the DOD. Using this approach, social media records are printed onto paper and stored in paper recordkeeping systems. Agencies typically do not embrace this approach because of its paper-intensive and labor-intensive way of handling records, but concede that it a viable alternative to doing nothing while technology and best practices catch up with the reality that social media records are being created now and need to be captured now in some form.

Perhaps a more attractive approach to capturing social media records, mentioned by both NARA and DOD, is the idea of ‘harvesting’ social media records. Using this approach, social media systems and sites are periodically reviewed and the record content in it is harvested en masse and stored in an appropriate records repository. None of the agencies interviewed is currently using this approach, but rather they see potential in trying to capture social media records this way.

The capture challenge is less of a problem for DOD which houses on internal servers most of the social media tools, such as wikis (Intellipedia), blogs, and collaborative chat.

Challenge #3 -- Social Media Metadata

The third challenge is the difficulty of tagging content for retrieval by applying metadata. Currently, all agencies interviewed are using manual methods of adding metadata for social media content.

The study interviews revealed that, until best practices and tools emerge to assist in the records management of social media records, agencies are tending towards retaining all social media content so that those portions that are records are protected. To be safe, USGS is currently saving all information across all formats for future reproduction. This approach was also put forth by EPA as the least risky approach until the retention logistics are worked out and schedules applied to the records. HHS also retains information from their official blogs until a records review can be performed to determine whether the specific content merits retention as records. These agencies expressed understanding that this is not the preferred approach due to storage costs and due to the potential future cost of tagging and retrieval when this body of content needs to be searched. Keeping everything is an overly simplistic approach that preserves but does not identify the record content – and does not make the records

searchable, retrievable, and able to be dispositioned against multiple schedules based on content in keeping with NARA guidance and best practices for records scheduling. Now that NARA guidance specific to social media records has been issued, agencies may be better equipped to modify their policies and practices to address social media content as Federal records.

Challenge #4 -- Social Media Scheduling/ Disposition

The fourth challenge is that the lack of control of the content, as in Challenge #2, makes scheduling and disposition of records difficult.

The agencies that have already made their records schedules media-neutral, such as the USGS and EPA consider that social media records are sufficiently covered by these existing schedules.

Among the agencies interviewed, NARA and HHS are currently create different schedules that in some way differentiate between internal electronic information systems and public social media/networking sites, although their differentiators are not defined in these terms. The NARA and HHS differentiators appear to be by business function or electronic vs. other format. NRC plans to do the same in the future.

DOD and EPA do not differentiate between internal and external sources of content. NASA also takes this position and has an item in their records schedule specifically for public outreach records.

The interviewed agencies were split on whether they will use existing schedules or develop new ones for specific social media needs. The agencies recognize that if they have other copies of content in a system under their control that is also on a social media platform, then the copy placed onto the social media platform is probably a non-record copy. The exception is when there is a “back and forth discussion,” then the entire discussion thread must be retained for completeness, even if the agency-authored portion is retained in another recordkeeping system.

Challenge #5 -- Staffing and Education

The fifth challenge is the need for education to implement a successful social media records policy.

Several agencies commented on the persistent need for more records management staff and improved capabilities for providing records training to agency staff. The addition of social media platforms for records creation and receipt is seen as a net addition to the existing array of sources for records creation and receipt. Some records still need to be managed in paper or other non-electronic form, and the types of electronic records that are being created and received continue to expand. Until automation tools better support capture and retention of social media records, some agencies feel there is a need for more human intervention to manage this kind of record materials. One agency suggested the use of “watchers” who monitor social media sites for content from their agencies, until processes and software improve to the point where automation replaces the need for this level of human intervention.

NARA suggested one way to capture social media records is through harvesting (presumably in contrast to real-time capture at the time the record was created).

Modifying an agency records management program to incorporate new media types is now a constant for Federal records officers in the information age and the time for social media records is now.

Best Practices

Many agencies are actively tackling the use of social media in support of their missions. The April 2010 OMB guidance on the use of social media in support of the Open Government Directive defined “...that certain uses of social media and web-based interactive technologies [would] be treated as equivalent to activities that are currently excluded from the (Paperwork Reduction Act) PRA.” It further clarified that the guidance applied to information shared both on .gov sites, as well as on any third-party site, such as Facebook or Twitter. Best practices in any agency must acknowledge and adhere to this guidance.

This study identifies some best practices that are needed for successful implementation of records management of social media. Although no agencies interviewed have fully implemented such a records program, most of the agencies are moving in the right direction and making significant progress toward implementing their social media records programs. The following is a list of best practices which allow an agency to move forward toward a successful program:

- Best Practice #1 -- Develop communications between social media team and records managers
- Best Practice #2 -- Develop social media policies making use of sources for help
- Best Practice #3 -- Define roles and responsibilities
- Best Practice #4 -- Implement records management for social media as part of enterprise content management

Best Practice #1-- Develop communications between social media team and records managers

The NARA Bulletin mentions that development of a records management program for managing social media content cannot be done by the agency records management staff alone. Success requires the active participation of agency records management staff, web managers, social media managers, information technology staff, privacy and information security staff, and perhaps other relevant stakeholders. Several practices aimed at encouraging this behavior were found in the course of interviews.

EPA established a Social Media Council made up of representatives of social media, web management, records management, communications, technology, and program offices.

USDA has instituted records liaisons, in each its sub agencies, which coordinate records policy with their business tools, procedures and policies, insuring that records requirements are met. While USDA does not yet have a specific policy on social media, this offers a natural communication path for social media-related requirements within the agency.

NRC, which is assessing the impact and use cases of all social media environments before allowing their use, has set up a cross-agency social media working group. The working group is evaluating the needs of the NRC mission, assessing the role/opportunity for social media within the business of the organization and will publish their findings and recommendations to the CIO and executive team.

NASA encourages records managers and web managers to develop a working relationship, so that a mutual understanding of each other’s requirements can help to build policy. The goal is to address the business and records needs of the agency in a technology-agnostic manner.

In the case of the acquisition of social media tools above the current OMB threshold of \$100K, NARA policy applies a capital planning process to deployment of social media sites. Within this process, the

social media and records principals evaluate business impact, appropriateness of the content, capture methods, and records management requirements. These gates need to be passed in order to proceed with use of the subject media vehicle and information.

HHS formed a web council many years ago, comprised of representatives of various agency business units as well as the Assistant Secretary for Public Affairs (ASPA). As web, collaborative, and social media requirements expand and change, it is within the council's purview to form policies and guidance around usage, security and records policy.

GAO currently views social media as a valid, critical records type and include any records policy under the auspices of the agency Records Officer. In responding to expanding, changing business requirements, GAO has established a cross-agency group involving the CIO, GAO's Knowledge Services, Public Affairs, Audit, and Policy divisions. While new policy is still under development, team members' efforts provide a holistic view of social media usage and associated records requirements within the agency.

Best Practice #2-- Develop social media policies making use of existing resources for help

Agencies use multiple information resources when creating policy and implementing processes that model best practices in the use of social media with respect to recordkeeping. WebContent.gov provides insight into challenges surrounding the use of social media including the struggle to identify records requirements. The site provides many useful policy references including references to the OBM Guidance outlined above.

NARA – the primary authority on records management – released the Bulletin 2011-02 “Guidance on Managing Records in Web 2.0/Social Media Platforms” on October 20, 2010. This bulletin provides Federal agencies with information on how to classify social media activity as a record and the policies and procedures associated with such a classification. The Bulletin followed release of A Report on Federal Web 2.0 Use and Record Value, NARA, 2010, <http://www.archives.gov/records-mgmt/resources/web2.0-use.pdf> (or <http://blogs.archives.gov/records-express/?p=927>).²⁰ In working within its own organization, NARA's Policy and Planning Staff created a strong policy on the use of social media for its business owners: “Rules of Behavior for Using Web 2.0 and Social Media Web Sites and Responsibilities for Content Management” (Interim Guidance 831-2, February 24, 2010). The Web 2.0 and Social Media Project Proposal form includes the following questions to be asked about social media:

- Hosted on an external site or on the agency's web servers?
- How does this project support the agency's Strategic Plan?
- Intended audiences?
- Estimate of resources required (# of staff, hours, materials, software, etc)
- Will proposed social media be used to create or maintain data or information meeting the definition of a Federal record per 44 USC 3301 and 36 CFR 1222? ___ Yes ___ No ___ Maybe
- If yes, how will the records, drafts, and other products from this project be captured and managed during their entire retention period?
- Who will oversee or manage the project if approved?

NRC, while working toward a current social media policy and records requirements, published initial guidance policy for its employees two years ago. In the interim, they have posted multiple directives

regarding the need for rigor in understanding and applying existing records guidance to social media content, as with content in any other form. These communiqués outline the legal and records implications of decisions around this content.

HHS has a social media policy, based on best approaches they have seen at other agencies, such as GSA, and posts this policy to their “New Media” website. In addition other tools, such as a one-page handout to those considering the use of social media, provide some critical guidance to potential new users and organizations.

EPA has published several social media guidance documents to the outward facing Web Guide (<http://www.epa.gov/webguide>), as well as to the wiki operated by the Social Media Subcouncil of the Federal Web Managers Council at <http://govsocmed.pbworks.com>. The guidance covers a Comment policy, Twitter, Facebook, Widgets, Discussion Forums, and YouTube Channel.

One additional resource is the recently-released report by Patricia C. Franks of San Jose State University, on behalf of the IBM Center for The Business of Government,, entitled “How Federal Agencies Can Effectively Manage Records Created Using New Social Media Tools.”²¹ Another resource is the American National Standard (ANS) report by ARMA International on “Implications of Web-Based, Collaborative Technologies in Records Management.”²²

Best Practice #3 – Define roles and responsibilities

We must emphasize the issue of roles and responsibilities, since it will guide any successful deployment of social media tools. There needs to be a cross-organizational organization whose primary role is to aid in understanding and guiding agencies in the use of social media and records implications. Many agencies have implemented social media to enhance the interaction of employees and public constituencies with the agency. These agencies are providing de facto best practices for the Federal Agency social media records policies and procedures. EPA uses social media extensively in support of its mission. They believe that social media allows them to share information resulting in creative exchanges on environmental topics. The collaboration facilitated through social media channels provides valuable insight. EPA recognizes, however, that the use of social media by the agency must adhere to required processes and privacy regulations. Information on the use of social media and how to employ it within these bounds are available to all EPA employees on their website. Further, they released via email in January and February of 2010 their “Interim Guidance for Representing EPA Online Using Social Media.”

HHS similarly provides its employees a rich information source to know how to use social media and understand when records identification and retention come into play. HHS’s website <http://www.newmedia.hhs.gov> provides links to HHS policy and procedures but goes beyond that by providing many OMB and other agency best practices guidance as well. HHS encourages the use of social media to facilitate increased communication, collaboration, and information exchange in support of their mission. In support of transparency, they strive to provide credible, accurate data that adheres to records management policies.

Increasing the authority and the visibility of records management is important. The oversight of published information and guidelines or standards (e.g., <http://newmedia.hhs.gov> and <http://www.epa.gov/webguide>) ensures transparency in capturing, managing, classifying, and monitoring social media generated information that may comprise a “record” and provides guidance to those using it.

Within agencies such as NRC, HHS, GAO and others who have initiated social media committees or working groups, the need to focus responsibility and accountability has become apparent. They see and will move to more crisply address who drives the creation, enforcement and execution of actions in support of social media policy within their agencies. NARA has moved to very clearly define roles and responsibilities around new media management, including records management.

EPA published its “Interim Guidance for EPA Employees Who Are Representing EPA Online Using Social Media (2010)” at <http://govsoc.med.pbworks.com> , which has the requirement to maintain records, when applicable.

Some of the agencies interviewed have begun to place executive focus on the declaration and retention of social media content as a records/archival function. HHS has placed social media responsibility with the Chief Records Officer. The ongoing NRC effort to define and implement social media policy is driven by its Office of Information Systems (OIS) and is specifically overseen by the CIO, the Chief Records Officer, and an assigned OIS officer.

NARA has instituted the role of a Chief Digital Media Strategist, who directly engages with the agency’s Deputy Archivist to implement appropriate social media policies and procedures. This key leader gets direct, visible support from the Archivist of the United States and other personnel have been aligned with the initiative, including placing the agency Records Officer under the CIO. In concert, these changes further encourage the embedding of records management consideration and behavior in all social media management decisions.

Best Practice #4 -- Implement records management for social media as part of enterprise content management

A number of agencies are implementing enterprise content management systems (ECMS) for records management. This provides an opportunity for implementing records management for social media. The requirements for capturing, tagging with metadata, and scheduling the content is the same for all records. The agencies need to consider social media records in the ECMS development and implementation.

Many of the agencies interviewed have not yet implemented their enterprise content management platforms. They identified ECM as a strategic technology under consideration, acknowledged the need for management of unstructured content and inherent records management. Virtually all participating agencies acknowledged the need for tight integration with social media content providers and provision of records management discipline across all media types.

NRC and GAO, who have existing enterprise content repositories and are in varying stages of deploying “next generation” enhancements to their ECM environments, are presuming the need to include social media content under ECM system and records management. USDA has defined and is implementing a standard platform for records management.

Summary

While many agencies appeared to be waiting for NARA to establish baseline best practices which they would then tailor to their needs, others have established social media working groups that are looking at

the agencies trend in using social media and are beginning to formulate standards and best practices around these trends.

The framework for the best practices outline above is manifested in a wide range of best practices – some mature; others in early formation. The most common and pervasive theme is one of communication and assimilation of Web 2.0 and records management into all mainstream projects as a deliberate action, not an afterthought. Using guidance, agencies can proactively implement guidance identifying what information is applicable, how it is captured, and what its retention will be.

Across the board, however, more thorough communication between social media developers and propagators and records management is paramount.

Recommendations

Call to Vendors

The content and subject determines if an item rises to the level of a record, and procedures are in place to perform this analysis for original records. The challenge is with the ability to track the social media interchange to determine if a document rises to the level of records retention, if it was originally determined that it was not a record for retention. This can be exacerbated for traceability of record updates as they go through the social media vendor's services. For example, Facebook postings and comments are managed and retained on the Facebook site, which does not allow for easy tracking or guarantees to capture all comments. Even though regulations state that it is ultimately an agency responsibility, the agencies are looking to NARA for guidance on what constitutes a new/separate record based upon comments posted by the public to an original statement made and retained by an agency.

Agencies see a role for the vendors and service providers in solving some of the social media records management issues, although they concede that the records management responsibility rests within the agency.

Agencies do not usually own the content with public social media applications and cannot control the backend for what content gets saved and how that content is managed. The Federal government's clout in the marketplace could be brought to bear on service providers (e.g., Facebook and Twitter) to work with standards and develop and implement tools to assist the government in managing content as records on their public site. An ultimate records management technology capability would allow for the configuration of the client or server to heuristically capture social media records without user intervention.

A second, overriding suggestion is for some type of back-end solution where social media records are automatically tagged with metadata. The social media service providers could then bundle the records and provide them back to the agencies in a format that would allow records schedules to be applied accordingly and assist with long-term record preservation.

Further guidance by NARA on this issue could provide a template of how the vendor community can build tools that will assist the agencies in ensuring they are capturing the right records along with the string of comments. This would be used for both the original record capture and the changing record that needs to be captured.

Call to NARA

The agencies are looking to NARA to take the lead in developing policies, guidance, and solutions that will finally resolve the existing dilemma of how to deal with social media records. The recent release of NARA Bulletin 2011-02 on Guidance on Managing Records in Web 2.0/Social Media Platforms is a big step in NARA providing assistance to agencies in managing social media records. This bulletin builds on the former NARA guidance on social media records including:

- NARA Guidance on Managing Web Records (January 2005)
- Implications of Recent Web Technologies for NARA Web Guidance (<http://www.archives.gov/records-mgmt/initiatives/web-tech.html> , 2006 Updated)
- NARA's Report on Federal Web 2.0 Use and Record Value (2010)

The agencies requested that NARA develop guidance on which social media content would be records. The agencies indicated in the interviews that an increased awareness and acceptance of the value of records management with respect to Web 2.0 data would assist those responsible for records management. In addition, guidance is needed on how records management would be handled where multiple agencies are involved – who has primary responsibility, etc.

Other Guidance for Agencies

The GAO testimony of July 2010²³, referred to in Appendix A, identified several challenges associated with Web 2.0 information:

- Training on proper use of social networking tools
- Determining requirements for preserving Web 2.0 information as Federal records
- Establishing mechanisms for preserving Web 2.0 information as records

GAO noted that the agencies are taking steps to identify the issues and developing processes and procedures to address them.

The San Jose State University report recommended that the Federal government rethink the definition of records and the concept of records management in the Web 2.0 world, undertake research on preserving digital objects as records, and develop training to mitigate risk associated with use of social media technologies.

The report by the ARMA International, referred to in Appendix A, is a standard that suggests developing policies and procedures for use of web-based, collaborative technologies and developing processes and controls for capturing, preserving, and tagging social media records.

Appendix A contains a complete list of relevant references.

Conclusions

When asked what they wanted in an ideal world, all agencies responded that they wanted a system which provides automatic metadata and content capture without human intervention. This would consist of an automated mechanism to identify, tag, create the metadata, and associate the data with the proper records schedule.

An ideal world would address how records management would be handled where multiple agencies are involved, such as who has the primary responsibility.

To create the ideal world, the following are needed: standards for metadata and capture, commercial Web 2.0 products and sites implementing these standards, and, potentially, application programming interfaces (APIs) to implement the standards. In the absence of those APIs, some process to capture the data at the time of creation is essential, because of the difficulty of as getting the information from the third-party services. A level of intelligence is needed for some automation that knows schedules, privacy, records, etc.

Similarly, an increased awareness and acceptance of the value of records management with respect to Web 2.0 data makes the ideal world a happier place for those responsible for records management. ACT-IAC and the participating members look forward to continuing to work with our supporting GAP members and Federal Agencies to help everyone find that ideal world where records management and social media intersect effortlessly and provide maximum value to each organization.

¹ Presidential Memorandum on Transparency and Open Government, January 21, 2009, <http://www.whitehouse.gov/the-press-office/transparency-and-open-government>

² OMB Open Government Directive, December 8, 2009, http://www.whitehouse.gov/sites/default/files/omb/assets/memoranda_2010/m10-06.pdf

³ OMB Memorandum on Social Media, Web-Based Interactive Technologies, and the Paperwork Reduction Act, April 9, 2010, http://www.whitehouse.gov/sites/default/files/omb/assets/inforeg/SocialMediaGuidance_04072010.pdf

⁴ Federal Records Act (44 U.S.C. Chapter 31)

⁵ NARA Regulations (Subchapter B of 36 Code of Federal Regulations Chapter XII)

⁶ Social Media and Web 2.0 at the National Archives, <http://www.archives.gov/social-media/>

⁷ Rules of Behavior for Using Web 2.0 and Social Media Web Sites and Responsibilities for Content Management, NARA Guidance 831-2, February 24, 2010, <http://www.archives.gov/social-media/policies/831-2.pdf>

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- ⁸ Web 2.0 and Social Media Project Proposal (February 24, 2010), <http://www.archives.gov/social-media/policies/831-2-proposal-form.pdf>
- ⁹ HHS Center for New Media (<http://www.newmedia.hhs.gov>)
- ¹⁰ HHS-OCIO Policy for Social Media Technologies (Policy 2010-0003 – OCIO), March 31, 2010
- ¹¹ Social Media Subcouncil of the Federal Web Managers Council wiki (<http://govsocmed.pbworks.com>)
- ¹² Webcontent.gov (http://www.usa.gov/webcontent/technology/other_tech.shtml)
- ¹³ EPA Web Guide (<http://www.epa.gov/webguide>)
- ¹⁴ “Interim Guidance for EPA Employees who are Representing EPA Online Using Social Media (2010),” <http://govsocmed.pbworks.com>
- ¹⁵ Deputy Secretary of Defense, Directive-Type Memorandum (DTM) 09-026 on Responsible and Effective Use of Internet-Based Capabilities
- ¹⁶ Chief Information Officer, Department of the Navy, Memorandum on Web 2.0 – Utilizing New Web Tools
- ¹⁷ NARA Guidance on Managing Web Records, January 2005, <http://www.archives.gov/records-mgmt/policy/managing-web-records-index.html>
- ¹⁸ Implications of Recent Web Technologies for NARA Web Guidance, 2006, Updated, (<http://www.archives.gov/records-mgmt/initiatives/web-tech.html>)
- ¹⁹ Guidance on Managing Records in Web 2.0/Social Media Platforms, NARA Bulletin 2011-02, October 20, 2010, <http://www.archives.gov/records-mgmt/bulletins/2011/2011-02.html>
- ²⁰ A Report on Federal Web 2.0 Use and Record Value, NARA, 2010, <http://www.archives.gov/records-mgmt/resources/web2.0-use.pdf> (or <http://blogs.archives.gov/records-express/?p=927>)
- ²¹ Patricia C. Franks of San Jose State University, on behalf of the IBM Center for The Business of Government,, “How Federal Agencies Can Effectively Manage Records Created Using New Social Media Tools, 2010, <http://www.businessofgovernment.org/report/how-federal-agencies-can-effectively-manage-records-created-using-new-social-media-tools>
- ²² American National Standard (ANS) report by ARMA International on “Implications of Web-Based, Collaborative Technologies in Records Management.”
- ²³ Challenges in Federal Agencies’ Use of Web 2.0 Technologies, GAO-10-872T, July 22, 2010, Statement of Gregory C. Wilshusen, Director, Information Security Issues, GAO, Testimony before the Subcommittee on Information Policy, Census, and National Archives, Committee on Oversight and Government Reform, House of Representatives, <http://www.gao.gov/products/GAO-10-872T> , (or <http://www.gao.gov/new.items/d10872t.pdf>)

THANK YOU TO OUR INTERVIEW PARTICIPANTS!

Completed Interviews with 10 Agencies
June - October 2010



Appendix A

Reading List

Presidential Memorandum on Transparency and Open Government, January 21, 2009,
<http://www.whitehouse.gov/the-press-office/transparency-and-open-government>

OMB Open Government Directive, December 8, 2009,
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GSA Center for New Media and Citizen Engagement,
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GSA Social Media Policy, CIO 2106.1, 2010 (Internal)

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<http://www.state.gov/documents/organization/144186.pdf>

HHS Center for New Media, Standards & Policies, <http://www.newmedia.hhs.gov/standards>

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<http://govsocmed.pbworks.com/Guidance%3A-Representing-EPA-Online-Using-Social-Media>

Implications of Web-Based, Collaborative Technologies in Records Management, ARMA International, 2011, BSR/ARMA 18-2011, <http://www.arma.org/standards/index.cfm>

Challenges in Federal Agencies' Use of Web 2.0 Technologies, GAO-10-872T, July 22, 2010, Statement of Gregory C. Wilshusen, Director, Information Security Issues, GAO, Testimony before the Subcommittee on Information Policy, Census, and National Archives, Committee on Oversight and Government Reform, House of Representatives,
<http://www.gao.gov/products/GAO-10-872T>, (or <http://www.gao.gov/new.items/d10872t.pdf>)

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NARA's 21st Annual Records Administration Conference (RACO 2009), Collaborating Across Boundaries: Government Records and Social Media, May 28, 2009, <http://www.archives.gov/records-mgmt/training/raco2009.html>

Social Media and Web 2.0 in Government, WebContent.gov, http://www.usa.gov/webcontent/technology/other_tech.shtml

Gov Social Media Wiki, <http://govsocmed.pbworks.com/>

GovLoop - Social Network for Government, <http://www.govloop.com/>

Appendix B Project Team Plan

The C&T Government Advisory Panel (GAP) has discussed federal agency challenges in adopting Web 2.0 -- social media. The SIG has undertaken a study, sponsored by the GAP, and the National Archives and Records Administration (NARA), in particular, to engage subject matter experts from industry, as well as stakeholders within the government, to build forums of discussion around the use of Web 2.0 collaborative technologies and processes to help government and its citizens connect more closely, collaboratively, and openly. There is specific interest in exploring agency policies regarding records management processes challenged by this new media use. The GAP has requested that the C&T SIG explore and capture government best practices of collaborative technology records policies that can be leveraged and are appropriate to agency mission.

The leadership of the C&T SIG has requested industry support in leading this best practice project, and recommended that a committee chair and co-chair create a team of volunteers to interview, beginning in June 2010, at least ten (10) government agencies who are using social media to further their services to citizens. For each interview, the ACT-IAC Project Team will provide 3 interviewers (minimum of 2). ACT-IAC proposes to interview the CIO and the Records Officer for each agency. The interview team may also involve the agency New Media Director and others recommended by the CIO.

The ACT-IAC team will develop a report of the findings from each interview discussion within two weeks and provide a copy of the report to the agency for an expedited review. The report will include a list of interviewees, responses to the questions, other significant points, and a generalized summary. After review by the agency, ACT-IAC will publish the generalized summary for each agency, as an Executive Brief summarizing best practices, lessons learned, and records policies that have been adopted and can be applied to other agencies.

As a consolidated effort after all interviews are completed, the project team will develop a summary document which identifies best practices with attribution to the relevant agency. There will be no attributions to individuals identified in the summary. The project team will also develop a discussion panel and/or establish other appropriate vehicles to share best practices with the larger ACT-IAC and public audiences. This study is anticipated to be completed by March 30, 2011, with final presentation at a public event sponsored by ACT-IAC, such as the annual Executive Leadership Conference (ELC) in October 2010.

Best Practice Study Sponsors:

- Mark Giguere, Modern Records Program, Office of Records Services-DC, NARA
- Lisa Weber, Office of Information Services, NARA

Best Practices Participating Agencies

- DC Government
- Department of Agriculture, Food and Nutrition Service
- Department of Defense, Office of the Secretary
- Department of Health and Human Services
- Department of Interior, U.S. Geological Survey
- Environmental Protection Agency
- Government Accountability Office

- National Aeronautics and Space Administration
- National Archives and Records Administration
- Nuclear Regulatory Commission

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Appendix C
Best Practices Study of Collaborative Technology Records Policies
Study Questions

The Shared Interest Group (SIG) has undertaken a study, sponsored by the C&T Government Advisory Panel (GAP) and the National Archives and Records Administration (NARA), in particular, to engage subject matter experts from industry, as well as stakeholders within the government, to build forums of discussion around the use of Web 2.0 collaborative technologies (CT) and processes to help government and its citizens connect more closely, collaboratively, and openly. There is specific interest in exploring agency policies regarding records management processes challenged by this new media use. The GAP has requested that the C&T SIG explore and capture government best practices of collaborative technology records policies that can be leveraged and are appropriate to agency mission.

1. Does your agency use social media technologies to support the mission of the agency? How and why?
2. Who in your agency has responsibility for the policy for retention and management of records created in social media? Can you briefly describe that policy and what was the biggest challenge in establishing that policy? If you do not have a policy, what is the biggest challenge you are facing with respect to the establishment of such a policy?
3. From your agency's perspective, what social media technologies produce Federal records that need to be scheduled? Please provide specific examples and the business functions supported (Name-Yes/No-Example-Business Function)

Collaboration Technologies (social media) Examples

- Blogs
- Microblogging , e.g., Twitter
- Mashups
- Photosharing, e.g., Flickr
- Podcasting
- Social media releases , e.g., New Media press releases, Gov Gab birthday
- Social networks, e.g., MySpace, Facebook, LinkedIn, FedSpace
- Web chat (Live Support Software)
- Wikis, e.g., Wikipedia
- Video, e.g., YouTube
- Virtual Worlds, e.g., Second Life, Federal Consortium for Virtual Worlds (FCVW)

Tools (rather than records-producing technologies)

- RSS feeds/Syndicated Web feeds
- Widgets, Gadgets

4. Will your agency's social media records use existing disposition authorities or will records schedules specific to social media be submitted to NARA for approval?
5. What challenges do you see with respect to the **implementation** of records policy for social media? What challenges do you see with respect to the **enforcement** of records policy for social media records?
6. Does your agency differentiate records policies based on internal electronic information systems versus public social media/networking sites?
7. What actions should trigger the capture of social media content as records for retention for the appropriate periods specified in the agency's records schedule?

8. Does your agency use an electronic records management system (e.g. DoD Std. 5015.2 certified system) and, if so, are social media records stored and managed in it? How is this solution integrated with social media records? (Is content captured manually or is there some automated capture mechanism?) Please explain.
9. Can you give us an example of a best practice of your agency for social media records? Such as:
 - a. A policy for use of social media
 - b. A policy for social media records
 - c. The capturing of social media content for retentionIf so, why do you consider this a best practice?
10. How would you envision an ideal world regarding the retention and management of records created in social media?
11. Would you be willing to have a follow-up conversation with NARA as they further explore records management issues encountered by agencies using social media technologies?