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**Managing Social Media Records Procedure**

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Directive No: CIO 2155-P-06.2

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*Issued by the EPA Chief Information Officer,  
Pursuant to Delegation 1-19*

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**Managing Social Media Records  
Procedure**

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**1. PURPOSE**

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

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**2. SCOPE**

This 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.

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**3. AUDIENCE**

The audience for this procedure includes any EPA employee, contractor, or other person who uses social media in an official capacity on behalf of EPA.

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**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.

EPA 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 platform.

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 in an official capacity. Student interns, fellows, and SEE enrollees are not authorized to post to agency social media accounts. For specific guidance on using social media in an official capacity to communicate to EPA staff or the public, view the [Social Media Resources webpage](#).

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**5. AUTHORITY**

[44 U.S.C Chapter 31 Records Management by Federal Agencies](#)

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## **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.). [Review detailed information on EPA Records Schedules.](#)

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 an approved recordkeeping system according to the current version of [EPA's Records Management Policy](#).
- B. Additional information added to or appended to social media content constitutes a new record which must be saved in an approved recordkeeping system.
- C. The Records Liaison Officer and the [National Records Management Program Help Desk](#) 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 litigation hold or 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.

Other 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;
- Using tools built into some social media platforms to export content; and
- Working with third-party providers to implement social media capture.

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 a preferred capture method, it must provide training to applicable staff on how and when to use capture tools for social media.

EPA provides [EZ Desktop Records](#) for electronic records management tools for record retention.

NOTE: It is EPA policy not to delete any social media posts, activity or comments made by the agency on any third-party or EPA-hosted social media platforms/accounts. Public

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comments that violate the [Interacting with EPA Online policy](#) should be hidden (not deleted) from public view. The only exception to this policy is to delete a Twitter message – within minutes of it posting – to repost the same message with a corrected spelling, hyperlink, or similar minor adjustment. If the original post has received likes and comments, it should not be deleted, and the content correction should be made in the comments. It is a violation of this policy to delete a Twitter post for any other reason.

National Archives and Records Administration (NARA) provides information on how to save social media records:

- NARA Bulletin 2014-02, [Guidance on Managing Social Media Records](#)
- NARA Bulletin 2015-02, [Guidance on Managing Electronic Messages](#)

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**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](#) can help determine the most appropriate methods to capture and maintain records.

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**8. RELATED INFORMATION**

- CIO Policy 2184.0: [Social Media Policy](#)
- CIO Procedure 2184.0-P02.1: [Using Social Media to Communicate with the Public](#)
- Best practices and general information about EPA and social media can be found in the [Social Media Resources section of EPA's Web Guide](#)
- [View all Office of Mission Support \(OMS\) Information Technology and Information Management \(IT/IM\) policies](#)
- [View EPA's administrative policies issued through the Office of Mission Support Directives Clearance Review Process](#)
- CIO Policy 2155.5: [Records Management Policy](#)
- [Standards of Ethical Conduct for Employees of the Executive Branch](#)
- U.S. Office of Special Counsel, [Hatch Act Guidance on Social Media](#) NARA Bulletin 2014-02, [Guidance on Managing Social Media Records \(October 25, 2013\)](#)
- [Guidance on Managing Social Media Records](#)

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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** – Social media refers 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. [View a list of EPA Social Media Platforms](#).
- **Third Party Website** – for purposes of this procedure, any website that is not owned, operated or co-sponsored 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.

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**10. WAIVERS**

None.

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**11. MATERIAL SUPERSEDED**

CIO 2155-P-06.1: Managing Social Media Records Procedure, June 25, 2020

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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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