

National Archives and Records Administration

Transmittal Memo

DATE: February 16, 2021

TO: All Staff

SUBJECT: NARA 831, Social Media

Purpose: This directive provides guidance on how to use social media on behalf of NARA, how to create and manage NARA social media accounts, and provides rules and best practices for personal social media activities. It establishes a process for creating official NARA social media accounts; identifies joint roles for the Public and Media Communications and Visual Services Branch in the Communications and Marketing Division (SC) of the Office of the Chief of Staff (S) (hereafter referred to as the “Social Media Team”) and General Counsel (NGC) in approving new third party tools; and assigns responsibilities to the Public and Media Communications and Visual Services Branch for creating and periodically reviewing NARA accounts. This directive supports Goals 1, 2 and 3 of NARA’s Strategic Plan.

Background/significant changes: Social media is an important tool for enabling two-way communication between government and citizens and for increasing government transparency. NARA has adopted a decentralized approach to social media communication which encourages staff across the agency to promote their particular areas of subject matter expertise and to engage with users online. This model requires established guidelines to equip staff to represent the National Archives and Records Administration on social media platforms to their fullest potential. Note that paragraph a.(7) of Supplement 1 describes important actions that owners of existing NARA social media accounts must take within 60 to 90 days of this directive's publication to bring their accounts in line with new rules.

Available forms: NA-8027, Social Media Project Proposal

Canceled forms: None.

Canceled policy: Interim Guidance 831-2, Rules of Behavior for Using Web 2.0 and Social Media Sites and Responsibilities for Content Management, dated February 24, 2010.

Related policies:

- NARA 802, Use and Monitoring of NARA Office and Information Technology (IT) Equipment and Resources

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- NARA 807, Content Rules and Requirements for NARA Websites (Internet, Intranet, and NARA-Hosted Extranets) and Presidential Library Websites
- NARA 115, Media Relations (Releasable Information)

Effective date: This directive is effective the date of signature.

Contact information: For questions about this directive, please contact James Pritchett, Director, Public and Media Communications and Visual Services, at (202) 357-5300 or james.pritchett@nara.gov.

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National Archives and Records Administration

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SUBJECT: NARA 831, Social Media

831.1 Policy.

- a. NARA uses social media to:
 - i. “Make access happen” by sharing NARA’s vast holdings with different audiences;
 - ii. Engage in dialogue with our stakeholders and customers to share the work of the agency, listen to incoming feedback, and direct questions or concerns to the appropriate office for a coordinated response or action.
 - iii. Provide transparency into our decision-making and operations;
 - iv. Engage citizens to participate in our mission.
- b. The responsibility for communicating via social media is decentralized across NARA; staff are given standards and guidance to follow but are empowered with the authority of the agency to speak about their work.
- c. “Social media” is an umbrella term used to describe externally-facing websites and Internet-based tools that integrate technology, social interaction, content creation, and content dissemination. Social media platforms enable users to easily share content, to collaborate, and to form social connections and groups. Examples include, but are not limited to, Facebook, Twitter, Pinterest, Tumblr, LinkedIn, Instagram, YouTube, and blogs.

831.2 Scope and Applicability.

- a. This directive applies to everyone posting on official NARA accounts on behalf of the agency. This includes NARA employees, contractors, interns, volunteers, detailees, Foundation staff, and Foundation volunteers.
- b. It governs the use of official NARA social media accounts by those individuals in the course of performing their duties for NARA. Rules for personal social media accounts are governed by NARA 802 and are described in the NARA 831 Procedures Handbook. Accounts operated by a foundation for the foundation’s benefit and without NARA oversight are not covered by this policy.
- c. This directive does not apply to social media accounts run or managed by the Office of Inspector General (OIG). Any OIG social media account must follow OIG specific policies.

831.3 Responsibilities.

In addition to the authorities delegated in NARA 101, NARA Organization and Delegation of Authority, the following responsibilities are assigned in order to effectively implement this policy.

- a. The Chief of Staff
 - i. Ensures compliance with NARA regulations, policies and guidelines about information accessibility, records management, privacy, security, information quality, and release of information.
 - ii. Serves as NARA's authority for social media policy.
 - iii. Arbitrates the removal from public view of any content that could hurt NARA's reputation, or that contain non-releasable information or materials. The Chief of Staff consults with the Office of General Counsel (NGC) and Corporate Records Management (CM) on the removal of publicly posted information. See 831.5(c) for an outline of non-releasable information.
 - iv. The Chief of Staff may delegate these responsibilities to either the Director, Communications and Marketing (SC) and/or the Director, Public and Media Communications and Visual Services.
 - v. Serves as the lead office for coordinating social media communications in the event of an emergency or government closure.
- b. Social Media Team, Public and Media Communications and Visual Services staff within the Communications and Marketing Division (SC).
 - i. Advises the Archivist, Deputy Archivist, Chief of Staff, and appropriate Management Team members on agency-related issues that might generate major social media conversation and/or news media coverage.
 - ii. Manages and posts content on flagship (agency-level) social media accounts.
 - iii. Reviews NA-8027, Social Media Project Proposal forms and approves or disapproves the creation of new NARA social media accounts.
 - iv. Reviews, on an as-needed basis, NARA social media accounts to ensure they are still fulfilling their purpose and supporting NARA.
 - v. Authorizes and oversees the retirement of NARA social media accounts, pending the approval of executives and senior staff directors.
 - vi. Maintains an updated list of all official NARA social media accounts on Archives.gov, and a list of all approved, downloadable add-ons, tools and apps for those social media platforms.
 - vii. Works with General Counsel to create comment and posting policies and privacy policies for each authorized social media platform or category of platforms, and posts those policies on archives.gov.
 - viii. Coordinates with General Counsel, and third party service providers to negotiate amended terms of service (TOS) agreements and privacy impact assessments, as described in NARA 1609, Initial Privacy Reviews and Privacy Impact Assessments, for new social media platforms, tools, and apps.
 - ix. Provides guidance to Project Owners and Content Contributors in cases of potential comment policy violations that could necessitate moderation.
 - x. Works with CM to determine the most appropriate method to capture and manage social media records for temporary and permanent disposition. Oversees the collection and preservation of all NARA social media content in accordance with approved records disposition schedules.

- xi. Monitors emerging social media platforms and makes recommendations for adoption by the agency.
- xii. Provides periodic reports on the number, types, and use/impact statistics of NARA social media accounts.
- c. General Counsel
 - i. Works in collaboration with Information Services to review requests for new social media tools, platforms, software as a service (SaaS), third party tools, and apps during the software request process. Reviews legal agreements for all such accounts, and determines if the terms of the privacy agreements are sufficient for NARA participation. Conducts legal reviews of social media privacy agreements whenever the social media platforms change them. Identifies which social media platforms meet NARA's privacy and legal requirements standards.
 - ii. Answers general questions from NARA staff and associates on an as-needed basis about what content can be posted and what activities they can undertake on official NARA social media accounts, with particular focus on issues concerning the Hatch Act, endorsement concerns, and following GAO guidance related to spending of funds on advertising and the ban on grass roots lobbying.
 - iii. Provides consultation to the Social Media Team with regard to interpreting and carrying out the comment policy.
- d. Chief Privacy Officer works with the Social Media Team to create privacy impact assessments for each authorized social media platform and posts them on Archives.gov (<https://www.archives.gov/privacy/privacy-impact-assessments>).
- e. Information Services works with NGC to review all requests to use new software, including software as a service (SaaS), third party apps, and social media add on tools.
- f. Corporate Records Management
 - i. Works with the Social Media Team to establish and apply NARA records schedule(s) to social media content.
 - ii. Consults on matters relating to file format, storage, retention, and transfer of permanent social media records.
- g. Executives and Senior Staff Directors
 - i. Review and approve/disapprove of Product Owner requests for new social media projects and approve/disapprove of requests to retire existing social media accounts.
 - ii. Ensure Product Owners are adhering to social media and related policies and coordinating as required with the Social Media Team.
 - iii. Executives may designate a Product Owner(s) for the unit after the effective date of this directive.
 - iv. When a unit Social Media Product Owner resigns the position or otherwise permanently leaves a facility, a new Product Owner must be designated within 30 days of the previous Product Owner's departure.
- h. Product Owners
 - i. Must be a NARA senior staff member, typically at the rank of business unit head, program director or staff director.

- ii. Request new NARA social media accounts (such as a blog or YouTube channel) that will fall under the authority of their unit, office or program, and take ownership of preexisting NARA social media accounts that fall under the authority of their office or program.
- iii. Request approval from their Office Executive prior to submitting requests to make new social media accounts.
- iv. Inform their office/unit executive and the Public and Media Communications and Visual Services staff of any unusual social media interest or activity on social media platforms which may be of consequence to the unit or NARA so that Public Affairs is aware of the situation and prepared to advise on next steps, if necessary. Examples include social media posts mentioning the agency, a NARA office/unit, or a NARA employee that may harm their reputations; an accidental post made by a content contributor that was meant for a personal social media post; or an accidental post of non-releasable information as defined in NARA 115, Media Relations. This is not an inclusive list, Product Owners should contact the Social Media Team and alert their supervisor if they have any questions about a particular post or activity. Product Owners should also alert the Social Media Team and their leadership when there are positive results of their efforts, such as, a positive post going viral, social campaign successes, reposts from national-level government officials or celebrities, etc.
- v. May, if they choose, manage NARA social media accounts on a regular basis.
- vi. Assign “Content Contributors” to manage the NARA social media accounts on a regular basis.
- vii. Follow content and comment policies for the social media platform and adhere to NARA's policies for use of social media and use of NARA IT resources and related communication policies.
 - 1. Responsible for self-posted content or other activities on NARA social media that violate those policies.
 - 2. Responsible for the actions of Content Contributors on NARA social media.
 - 3. Responsible for ensuring that social media records are managed in ways that prevent modification (protects data integrity) and ensure access for the required retention period.
- viii. Ensure that official social media account user engagement metrics are routinely gathered.
- ix. Ensure that questions posed by users are answered.
- x. Ensure all accounts must include a link to the National Archives Social Media Comment Policy page. This page will also list NARA's Public and Media Communications and Visual Services Branch as the principal media point of contact.
- xi. Comply with Social Media Team guidance on password security for official social media sites and routinely check to ensure that only currently authorized personnel have access.
- xii. Content Contributor(s)

1. May be one or more NARA employees, Foundation employees, volunteers, interns, or contractors.
2. Post content to NARA social media accounts on a regular basis.
3. Assigned to the role of Content Contributor by the Product Owner responsible for the NARA social media account. If the Content Contributors change at any point during the lifetime of the project, the Product Owner or their representative must provide the contact information of the new Content Contributor(s) to the Social Media Team.
4. Adhere to content and comment policies for the social media platform and to NARA 802, Use and Monitoring of NARA Office and Information Technology (IT) Equipment and Resources. Responsible for self-posted content or other personal activities on NARA social media that violate NARA 802 or the platform's policies.
5. Ensure that content (such as written comments and photos) posted onto NARA social media accounts by others does not violate policies for that social media platform or this policy. Review comments on all site posts. Publish approved comments on platforms where pre-moderation is required or enabled.
6. Authorized to delete, remove from public view, or report offending user-contributed content, and to warn or report other social media users who are interacting with or connected to the NARA social media account, per NARA comment moderation guidance.
7. Report any inappropriate content or behavior to the Social Media Team at socialmedia@nara.gov and await guidance before taking any actions related to user moderation (i.e. muting, blocking).
8. Check for questions left by other social media users and determine if responses are needed.
9. Monitor the social media content that must be maintained as a Federal record in accordance with the policies and procedures set forth in NARA 860, NARA's Corporate Records Management Program, the General Records Schedule and NARA Records Schedule (see NARA 831.8 below).

831.4 Accessibility

Per Section 508 Amendment to the Rehabilitation Act of 1973, Federal agencies must make their electronic and information technology accessible to people with disabilities. For guidance on best practices see the [Section508.gov](https://www.section508.gov) 'Create Accessible Video, Audio and Social Media' page (<https://www.section508.gov/create/video-social>). NARA social media content must comply as follows:

- a. Images and graphics require alt tags.
- b. All videos, both live and pre-recorded, must have captions or transcripts posted either in real time or within a reasonable time period afterwards.

831.5 Non-Releasable Information.

Per NARA 115, Media Relations, NARA officials and employees are prohibited from communicating certain types of information to the media. If asked directly, officials or employees must decline to comment.

- a. Information protected from disclosure by (one of the statutory exceptions to) the Freedom of Information Act, including: trade secrets and confidential financial information, medical and personally-identifiable information, and records compiled for law enforcement purposes;
- b. Pre-decisional information prepared during or in support of deliberative processes within the Executive branch, including materials prepared in support of NARA's annual budget request and documentation prepared during coordination and clearance of proposed regulations and legislation;
- c. Financial information relating to any NARA Fund account, including budgets, revenues, obligations, expenditures, or expenses and any information on planned or pending procurements, except when approved and validated by the Chief Financial Officer (or their designee);
- d. Active or pending legislation;
- e. Active investigations;
- f. Personnel information;
- g. Classified national security information; and
- h. Any other information that is protected from disclosure by law, regulation, Government-wide policy, or any other NARA policy. NGC, in its role as Chief FOIA officer, renders the decision as to whether or not information is protected from disclosure.

831.6 Authorities.

- a. Pub. L. 105-277, The Government Paperwork Elimination Act, which allows citizens to use electronic technologies when filing information with or retrieving information from the Federal Government.
- b. Pub. L. 104-06, The Clinger-Cohen Act, which requires agencies to implement a process that maximizes the value and assesses and manages the risks of IT investments.
- c. OMB Circular A-130 (Revised, Transmittal Memorandum No. 4), "Management of Federal Information Resources," which sets Government-wide restraints on the collection of information from the public.
- d. OMB M-00-13: Privacy Policies and Data Collection on Federal Websites, June 22, 2000, requires each Federal agency to make and post clear privacy policies for its web activities and to comply with those policies.

- e. Presidential Memorandum of January 21, 2009 (Transparency and Open Government), directed Federal agencies to use new information technologies to communicate with the public about official matters and to solicit public feedback.
- f. 5 C.F.R. Part 2635, Standards of Ethical Conduct for Employees of the Executive Branch, which directs Federal employees to perform their job duties impartially and to avoid conflicts of interest.
- g. OMB Memorandum M-10-23, Guidance for Agency Use of Third-Party Websites and Applications, which requires Federal agencies to take specific steps to protect individual privacy whenever they use third-party websites and applications to engage with the public.

831.7 Releasability.

Unlimited. This directive is approved for public release.

831.8 Records Management.

The regulations that govern proper management of temporary and permanent records apply to social media content and may be covered by various records retention schedules in the General Records Schedule or NARA Records Schedule. Before implementing dispositions, contact Corporate Records Management (CM) for current records disposition instructions applicable to records created by this directive.