

# **Managing Social Media Records**

Records Management Assessment Report

National Archives and Records Administration September 2023

#### MANAGING SOCIAL MEDIA RECORDS ASSESSMENT

#### INTRODUCTION

The National Archives and Records Administration (NARA), based on authority granted by 44 United States Code (USC) 2904(c), is responsible for assessing the proper management of records in all media within federal agencies to protect rights, assure government accountability, and preserve and make available records of enduring value. Under this authority, NARA conducts records management (RM) oversight of federal agencies, including agency inspections, electronic system audits, and records management assessments.

An assessment is a multi-agency evaluation of a specific topic, issue, or activity that has an impact on RM processes, procedures, or policies. The purpose of conducting an assessment is to determine the efficacy of business practices and policies. NARA also seeks to identify agency successes and challenges, and share assessment findings, recommendations, and best practices throughout the federal RM community.

In the fourth quarter of FY 2022, NARA conducted an assessment of ten agencies' policies, practices, procedures, and tools related to the use of social media (SM). See **Appendix A** for the list of participating agencies. This report synthesizes NARA's analysis of the information gathered during the assessment.

### Assessment Scope

This assessment identifies SM platforms in active use, how agencies use SM, how SM records are captured and managed, as well as agency compliance with <u>NARA Bulletin 2014-02</u>: <u>Guidance on Managing Social Media Records</u>.

## **Assessment Methodology**

During the assessment, agencies responded to a pre-assessment questionnaire, provided documentation relevant to the scope of the assessment, and participated in interviews.

NARA conducted interviews to understand how each agency uses SM and manages the related content and records. Discussions included Agency Record Officers (AROs) and other agency personnel responsible for developing and implementing policies, practices, and procedures for official agency SM accounts.

Additionally, NARA collected information from five third-party applications agencies are using to disseminate, capture, preserve, and/or manage SM content or records.

### NARA Bulletin 2014-02: Guidance on Managing Social Media Records

NARA Bulletin 2014-02 outlines several recordkeeping requirements and best practices for managing SM records.

SM content created in the course of agency business likely meets the definition of a federal record. The Federal Records Act defines records as information made or received by a federal agency 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 United States Government or because of the informational value of data in them.

NARA Bulletin 2014-02 identifies the following recordkeeping requirements:

- Agencies must determine and clearly define what aspects of SM content constitute a SM record.
- SM records must be captured and managed in such a way that they form a complete record. A complete record must have content, context, and structure along with associated metadata, like author name or date of creation, to ensure the reliability and authenticity of the record.
- After an agency identifies which SM content meets the definition of a federal record, the agency must determine whether an existing NARA-approved disposition authority, or records schedule, can be applied to SM records; this includes an agency-specific records schedule or the NARA General Records Schedule (GRS).
  - Without an applicable NARA-approved records schedule, SM records must be treated as permanent until an appropriate records schedule applies.
- Once an agency associates its SM records with an approved records schedule, it must decide how to manage its SM records throughout its lifecycle.
- Agencies must articulate definitive processes, policies, and recordkeeping roles and responsibilities throughout their organization to ensure SM records are consistently identified, captured, and managed per a NARA-approved records schedule.
- When an agency establishes a method to capture its SM records, it must train relevant staff on how and when to do so.
- Agencies must establish its capability to identify, capture and retrieve its SM records.
  - Agencies must determine if a SM platform can export any SM content deemed a SM record upon request.
  - If a SM platform cannot export a complete SM record, the agency is responsible for establishing a method of capture.
  - Agencies must determine any capture-related issues and include them in SM platform terms of service agreements (ToS) whenever possible.

As a best practice, NARA Bulletin 2014-02 recommends agencies establish a SM working group composed of:

- Records management staff;
- Web managers;

- SM managers;
- Information technology (IT) staff;
- Privacy and information security staff;
- Agency legal counsel;
- Public affairs staff; and
- Other relevant stakeholders.

#### The SM working group should:

- Apply the definition of a federal record to SM content and identify what constitutes a complete record, including the content, context, structure, and necessary metadata.
- Review existing records schedules to determine if SM records are appropriately covered by an approved disposition authority.
  - When SM records are not covered by an existing records schedule, agencies should develop a new schedule.
  - If updates or changes occur to a SM platform that were not originally accounted for in an agency's records schedule, for example SM user-enhanced content such as comments, additional metadata, or other information, the agency must reevaluate and reschedule the SM records.
- Discuss RM issues before rolling out new SM initiatives or changing the use of SM platforms.

This bulletin recommends agencies should take the following actions when establishing SM policies and procedures:

- Identify and describe what constitutes a federal record on all SM platforms;
- Define ownership of content and agency personnel responsible for managing SM records;
- Incorporate recordkeeping practices and requirements into ToS agreements when necessary;
- Internally and externally communicate SM records policies so employees and the public understand how the agency manages its SM records;
- Monitor ongoing use of SM platforms to determine if agency use changes the value of SM content or SM records, and
- Monitor whether changes to third-party ToS agreements on SM platforms affect management of SM records.

Agencies should consult their office of legal counsel about policies for moderating content consistent with First Amendment obligations and other relevant federal laws.

When establishing how to manage SM records, an agency may choose to manage temporary records whose retention is transitory or short-term within the applicable SM platform. Agencies should capture temporary records with long-term retention periods and permanent records outside the SM platform in an agency recordkeeping system. Agencies may need to work with third-party providers to implement SM capture tools.

Methods to capture SM records include:

- Web crawling or other software to create local versions of sites;
- Web capture tools to capture SM;
- Platform-specific Application Programming Interfaces (API) to pull content;
- Really Simple Syndication (RSS) feeds, aggregators, or manual methods to capture content, and
- Tools built into some SM platforms to export content.

#### SUMMARY AND ANALYSIS

#### **Pre-assessment Questionnaire**

Participating agencies answered questions about their SM program, content, and RM. Below are highlights of agency responses. See **Appendix B** for all questions and responses.

Each agency used an assortment of SM platforms in various ways, Agencies were active on as few as five and as many as 18 different SM platforms. Outside of the more common platforms such as Facebook, Twitter, LinkedIn, YouTube, and Instagram, some agencies also used platforms like Tumblr, Pinterest, Flickr, GitHub, Stitcher, Google/Apple Podcasts, Unsplash, WordPress blogs, Medium, Snapchat, GIPHY, Flickr, Twitch, Reddit, Dailymotion, and SoundCloud.

Most agencies had several program offices involved in the oversight and management of SM, with agency program offices associated with public affairs/media relations/communications in the lead. Only two agencies did not have an established SM working group. Other agency stakeholders involved in SM include the Office of the Chief Information Officer (OCIO), the Office of General Counsel (OGC), Agency Records Management Programs, the Privacy Office, and the individual project/program-specific office creating SM content.

All agencies indicated the development and implementation of specific policies, directives, guidance, and standard operating procedures (SOPs) to manage SM use. Six agencies had specific SOPs for capturing and managing SM records, and six agencies had training for agency personnel regarding capturing, preserving, and dispositioning of SM records.

Six agencies reported that all published content for all agency SM accounts was being captured and preserved. Six agencies allowed, responded to, and preserved SM comments, and five agencies received, responded to, and captured SM direct messages on specific SM platforms.

Four agencies reported using a third-party application/service to capture and preserve SM content, comments, and direct messages. Five agencies indicated that all SM records were stored and managed outside the related SM platform.

Four agencies indicated that the RM program had not explicitly defined which SM content constitutes a SM record. Five agencies reported having an agency-specific records schedule, five

agencies used GRS 6.4, item 020, for the disposition of SM records, and six agencies classified certain SM records as permanent records.

### **Agency Documentation**

In addition to completing the pre-assessment questionnaire, agencies provided various documentation related to SM:

- SM policies, directives, or guidance
- SM strategy plans
- Training slides or handouts on SM usage and management
- Checklists or forms
- SM ToS
- SOPs for capturing and managing SM records, and
- SM records schedules

Only one agency did not have a SM policy, another agency did not have any SOPs related to SM, and four agencies did not submit documentation identifying which NARA-approved records schedule covered the disposition of SM records.

Most agencies asserted that there is a lack of specific "how to" guidance for federal agencies on what, when, and how to perform specific tasks related to managing SM records. Agencies want NARA to promote standardized approaches to managing SM records and provide more detailed "how to" guidance on doing so.

One agency stated that NARA needs to take the lead on figuring out the best ways to manage SM records, putting together a government-wide task force, and partnering with digital preservation vendors to develop a standard web-based application/tool or wireframe that clearly illustrates the necessary structure and functionality of a web-based digital archival tool that captures and manages SM records per NARA regulations. Agencies also expressed that NARA should develop specific SM RM training that offers more instructive guidance and create a central place where agencies can get executable advice, examples, and resources on digital preservation methodologies and tools. See **Appendix C** for a list of all submitted documents.

**Finding 1:** Most agency documentation outlined how SM accounts are approved and created, what types of content are allowed on SM platforms, who is responsible for performing SM engagement, and what federal RM regulations apply to SM records. Several SM program personnel expressed that agency documentation has not clearly defined SM records or offered a standardized method for identifying and capturing SM content as a record. Furthermore, agency staff explained that it is also difficult to determine which SM records are permanent or temporary, and which program office is responsible for capturing SM records. Agencies also requested specific guidance on when and how to capture SM records, where to manage them, and when or how SM records should be transferred and disposed of.

**Recommendation 1.1:** Agencies need to ensure that SM policies and procedures offer practical "how to" RM guidance. Simply restating federal RM regulations does not provide sufficient information to ensure the proper management of SM records.

**Recommendation 1.2:** Agencies must create definitive processes and policies that concretely define what aspects or types of SM content constitute SM records and demonstrate methods staff must employ to differentiate SM content from SM records.

**Finding 2:** Agencies do not routinely review or update agency policies, guidance, and SOPs. During assessment interviews, it was apparent that some agency policies and SOPs do not match current business practices.

**Recommendation 2:** The ever-evolving nature of technology necessitates periodic reviews and assessments on the effectiveness of SM policies, practices, and procedures to ensure that agency documentation is relevant and congruent with program operations. Agencies should develop an annual review process for all SM documentation.

### **Agency Compliance with NARA Bulletin 2014-02**

NARA issues bulletins to instruct agencies on the proper management and disposition of federal records. These bulletins aim to offer more in-depth information and directions relevant to RM requirements from the Federal Records Act (FRA), Code of Federal Regulations (CFR), and other applicable executive directives.

NARA bulletins provide mandatory RM requirements that agencies must follow. Agencies are responsible for determining the most appropriate ways to implement and consistently comply with NARA bulletins across all program offices and business processes.

Below is a summary of key points regarding bulletin compliance among participating agencies. See **Appendix D** for a reference table illustrating more information.

- 1. One agency needed to articulate specific business processes to ensure the identification, preservation, and management of SM records.
- 2. Another agency did not have established SM policies to ensure the identification, preservation, and management of SM records per NARA guidance.
- 3. Two agencies did not define unique recordkeeping roles for agency personnel.
- 4. Five agencies needed to identify specific recordkeeping responsibilities to ensure all SM records are appropriately identified, managed, and captured throughout the agency.
- 5. One agency did not identify what specific SM content constitutes the official SM record.
- 6. Two agencies needed to identify and establish methods to manage agency SM records.
- 7. Two agencies need to establish and implement a standard way to manage SM records.
- 8. Four agencies reported having various inconsistencies in managing SM records.
- 9. Three agencies must establish whether their SM records require a temporary or permanent retention period.
- 10. Five agencies need to determine whether an existing NARA-approved disposition authority, including the GRS, can appropriately cover its SM records.

- 11. Five agencies reported not having an agency-specific records schedule for SM records.
- 12. Only three agencies confirmed treating SM records as permanent records in the absence of having an applicable records schedule.
- 13. Four agencies did not train relevant staff on how and when to capture SM records.

**Finding 3:** Several AROs indicated that it is sometimes challenging to implement guidance from NARA bulletins because senior leadership or General Counsel often considers information from NARA bulletins optional. AROs expressed that NARA's use of ambiguous language is one reason senior officials rarely provide the support and resources needed to fully implement and maintain processes that comply with NARA Bulletin 2014-02.

**Recommendation 3.1:** Federal agencies must comply with all RM guidance in the NARA Bulletin 2014-02. Thus, all agencies need to review and assess their level of compliance with this bulletin. Agency RM programs should lead assessments and include IT, appropriate SM stakeholders, and program offices. RM programs will use assessment results to develop and urgently implement corrective action plans to redress non-compliance areas.

**Recommendation 3.2:** NARA should review and revise Bulletin 2014-02 to provide specific "how to" information and use more prescriptive language. The bulletin should include scenario-based guidance clearly outlining what, when, where, and how to perform specific RM tasks and a list of applicable digital archival applications/tools agencies could use to manage SM records.

### **Social Media Programs**

Each agency had different methodologies and procedures for managing the agency's SM presence, processes, personnel, and records. Six agencies centralized their SM programming in the office of public affairs/communications/media operations. Eight agencies had an established SM working group that met regularly, and four agencies consistently made their RM program aware of which social media platforms and accounts were in active use. However, most SM programs could not confirm how many agency personnel managed their SM records.

**Finding 4:** Most SM programs have written policies and guidelines outlining how SM accounts are approved and created, what types of content are allowed on SM channels, and who is responsible for SM engagement. However, most SM programs did not have written instructions about what SM content constitutes a SM record, which records are permanent or temporary, who is responsible for capturing SM records, how to capture and where to manage SM records, as well as when these records should be transferred or disposed of.

**Recommendation 4:** Agencies must develop and disseminate written policies and procedures that standardize and specify what tasks agency personnel must perform to capture and manage its SM records successfully.

**Finding 5:** Agency RM programs had varying levels of involvement with SM programming. Most RM programs helped to develop SM policies, guidance, or records schedules. However, only a few agency RM programs had regular, continuous involvement with SM programs.

**Recommendation 5:** Agency RM programs should be integrated and connected to the agency's SM program. Full integration requires that the RM program:

- Is always aware of how many SM accounts are in active use throughout the agency and which agency staff are capturing and managing SM records;
- Should also be an active member of the agency's SM working group;
- Should develop and facilitate RM training for personnel tasked with SM responsibilities;
- Be familiar with all aspects of the agency's SM strategy to ensure that RM is sufficiently and appropriately embedded in all SM program initiatives;
- Always be involved in the retirement or deactivation of SM accounts, and
- Consistently collaborates with IT to identify and implement technologies that effectively support the management of SM records.

**Finding 6:** Participating agencies did not have processes in place to verify the capture of SM records. Most RM programs reported needing more staff, technological know-how, or tools to ensure consistent capture and management of SM records.

**Recommendation 6:** Agencies should consider using digital archiving applications to centralize and automate the capture of SM records across the agency.

### **Social Media Training**

Four agencies did not provide any specialized training for SM users, and those agencies that provided SM training focused on how to post/publish, monitor, and remove SM content. Training rarely included information on how to identify, capture, and manage SM records.

**Finding 7:** Although the NARA Bulletin 2014-02 does not outline what information agencies should include in SM training, agencies should ensure that specific RM instructions exist within their SM training to promote consistent identification, capture, and management of SM records.

**Recommendation 7:** Agency RM programs should ensure that SM training includes specific instructions on managing SM records. SM training should provide a reliable method for identifying and saving all types of SM records, which SM records are permanent or temporary, when and how to capture SM records, where SM records are managed, when and how SM records should be transferred or disposed of, and how to contact the RM program for assistance. If the agency uses a third-party application or native SM platform tool to capture and manage SM records, the training should demonstrate all applicable RM functions.

## **Social Media Records Management**

## **Defining Social Media Records**

As previously mentioned, six agencies' RM programs defined what SM content is considered federal records via their SM policy. Generally, these agencies assert that only SM posts

containing original content not captured elsewhere at the agency are considered SM records. SM posts that contain information that exists and is managed in an agency recordkeeping system are deemed non-record material.

Four of the six agencies assert that relevant staff must manage the retention and disposition of SM records per an approved records schedule, and program offices must consult with their assigned records liaison or RM program staff to identify the appropriate records schedule to execute the proper disposition of SM records.

One of the six agencies' SM policy mandates that SM should not be used externally for creating or posting any content that rises to the definition of a federal record. If an exception to policy is needed, the OCIO must be consulted and a capture and RM plan is established for the SM posting by the program office per the agency's RM policy. Additionally, when SM applications contain records, application owners must ensure RM requirements as defined by 36 CFR 1236 and the agency's RM policy or establish written procedures are met. Application owners must gain ARO approval of an alternative process for capturing and disposing of any records within the SM application. This agency's SM policy illustrates a best practice that can promote consistent capture and appropriate management of SM records.

**Finding 8:** Six agencies explained during interviews how they defined SM records as any SM post containing original content that is not captured elsewhere. In these cases agency SM account owners and managers are instructed to liaise with agency RM program staff when executing the disposition of SM records. Despite these instructions, some agency staff asserted that it is still unclear when SM content records should be captured and managed outside the SM platform. Some interviewees stated that this definition does not help SM managers and content creators know how to treat SM posts or messages, especially those with back-and-forth engagement between SM followers and agency staff, or whether live-streamed SM events are original and require capture.

**Recommendation 8:** Agencies must evaluate how it uses SM platforms in order to clearly define what types of SM content must be classified as SM records. Agencies should offer specific scenarios to relevant staff to illustrate the various types of SM content that are records and include the appropriate retention periods. Below is an illustrative scenario:

If a program office solicits or promotes continuous back-and-forth communication or engagement with the public via any SM platform, this connotes a transaction of business requiring formal agency action. Thus, all received and sent SM responses are SM records.

To illustrate further, let's consider the following scenario. A program office's SM team member is tasked with routinely responding to received SM post comments and messages. This staff member must monitor a specific SM platform daily for received comments and messages, then draft, gain approval, and post responses via this SM platform. In this scenario, each received and sent SM comment and message is a SM record as they document the program office's formal business transaction via this SM platform.

In the scenario above, the agency must determine (1) whether the received and sent comments and messages are temporary or permanent records, (2) whether to manage these SM records via an already approved records schedule or draft a new one, and (3) whether the comments and messages warrant capture and preservation outside of the SM platform.

#### Record Schedules and Social Media

Five agencies identified an agency-specific records schedule(s) used to apply temporary and permanent disposition for SM records. During assessment interviews, one agency was drafting a new records schedule for its SM records, and seven other agencies indicated using GRS 6.4, item 020. One agency reported using GRS 6.1 to cover SM accounts of Capstone officials, and another used GRS 4.2, item 010 and GRS 5.2, item 010. Two agencies did not identify any NARA-approved records schedule, but asserted that all SM content is treated as permanent records, and are managed within the applicable SM platform. Most agencies have yet to execute the disposition of their SM records.

NARA Bulletin 2014-02 offers the following questions to help agencies determine the record status of SM postings/content:

- Does it contain evidence of agency policies, business transactions, or mission?
- Is the posted information only available on the SM platform?
- Does the agency use the SM platform to convey official agency information?
- Is there a business need for the SM post/content?

If an agency answers yes to any of the questions above, the SM content is a federal record. Additionally, agencies create SM records when they use SM to collect public comments that can influence agency action, promote continued engagement with the public that requires agency responses, or other forms of collaboration via SM platforms.

Some agency staff questioned whether considering SM posts as original records were more accurate because posts often represent an amalgamation of bits and pieces of information from different records. For example, one interviewee posed the following question - when senior officials use their government SM accounts like micro-blogs to communicate agency activities and their opinions, should their posts be classified as original content?

**Finding 9:** The evolutionary use of SM calls for a deeper evaluation of SM content to ensure its proper classification and management. When government entities began using SM, they primarily pushed out duplicates of existing records or information documented by federal records managed elsewhere. Today, SM use has evolved, and some government entities use SM to solicit or promote back-and-forth communication with the public via SM post comments, chat threads during live streams, and direct messages.

**Recommendation 9:** Agencies must determine how SM content is used and schedule it based on the content of the documented information, its function, and the purpose of the recorded data as it relates to agency business.

### Permanent and Temporary Disposition of Social Media Records

Most agencies used GRS items for temporary dispositions and developed agency-specific schedules for permanent dispositions. Below are illustrations of how GRS items may be suitable for designating certain SM records as temporary.

# GRS 4.2: Information Access and Protection Records, item 010: General information request files

This item may apply to SM comments or direct messages requesting agency information, publications, or photographs as long as it does not require administrative action, policy decisions, special compilations, or research. *Please note GRS transmittal No. 43, released June 2023, announced that GRS 4.2, item 010, is superseded by GRS 5.2, item 010: Transitory records.* 

# GRS 5.1: Common Office Records, item 020: Non-recordkeeping copies of electronic records

GRS 5.1 allows for destroying non-recordkeeping copies of electronic records once preservation of the recordkeeping copy is done according to an approved records schedule. SM content may be deleted at any time, or can remain on the SM platform without the expectation of capture, provided the SM content reflects federal records maintained elsewhere by the agency. For example, if an agency posts a selection of photographs on Flickr, does not respond to any comments on the posted photographs, and maintains the original images as part of a scheduled photographic collection on an agency recordkeeping system, GRS 5.1, item 020, may be applied. The Flickr post does not need to be captured or maintained outside the SM platform.

#### GRS 5.2: Transitory and Intermediary Records, item 020: Transitory records

This item applies to any agency record used for a short period of time, generally 180 days or less, and the record is not required to meet legal or fiscal obligations or initiate, sustain, evaluate, or provide evidence of decision-making business.

For example, suppose an agency made a SM post that announces the time, place, and purpose of an agency meeting or event. Classifying this SM post as a transitory record is appropriate if it is only needed for agency business for 180 days or less and does not meet the additional requirements mentioned above. This SM post can remain within the platform and does not require capture and preservation elsewhere.

# GRS 6.4: Public Affairs Records, item 020: Public correspondence and communications not requiring formal action

GRS 6.4 allows agencies to destroy any comments received on SM after 90 days, provided the agency does not respond to the comments or does not collect and use the comments for agency business. It also allows agencies to destroy any SM post of information documented by other scheduled agency records stored and managed outside the SM platform. When GRS 6.4 applies, agencies do not have to capture SM posts or comments outside the SM platform.

#### **Agency-specific Records Schedule**

Here is an example of appropriately managing live-streamed SM content using an agency-specific records schedule. One of the participating agencies established that live-streamed SM content, regardless of the SM platform, is produced by and originates from the agency's television production studio and channels. Consequently, the agency downloads all live-streamed SM content after the live event, manages the download on its website, which serves as the agency's electronic recordkeeping system, and disposition is covered by an agency-specific records schedule. Thus, any live-streamed content remaining on this agency's SM accounts is non-record material.

**Finding 10:** Assessment interviews revealed that some agencies misapplied the GRS and certain agency-specific records schedules. For example, one agency's application of GRS 6.1: Email and Other Electronic Messages Managed under a Capstone Approach to cover the permanent disposition of all SM accounts of Capstone officials is not appropriate. GRS 6.1 excludes all SM content, including messages affiliated with SM accounts and direct messaging services.

**Recommendation 10:** Agencies must (re)evaluate and determine which records schedules are most appropriate to manage the disposition of all types of SM content and for the various ways an agency uses its SM accounts.

In general, SM content types include but are not limited to pre-recorded audio or video, live video streams, photo/infographic/digital images, GIFs/memes, textual posts, comments, direct messages, chat threads, posted web links, reposted content, spam, and even obscene/inappropriate textual posts.

Agencies must be aware that both sent and received comments, direct messages, and chat thread messages require coverage by an approved records schedule. Differing types and uses of SM content can require different records schedules and retention periods. Agencies are welcome to submit schedules to NARA modeled after the Capstone approach.

## Social Media Records Capture, Retention, and Disposition

Four agencies reported reliance on export tools provided by SM platforms to download SM content for records retention. Seven agencies indicated current and or prior use of a third-party application/service to capture and preserve SM posts, comments, and direct messages.

Four agencies confirmed that the SM content captured by a third-party application or service was the official recordkeeping copy of its SM records and that its SM records are captured and managed within third-party applications.

Table 1. Agency use of third-party applications/services to capture SM content/records.

No.	Third-party application/ service	Provider Website	No. of agencies using third-party application/service
1.	Archive-it	https://www.archive-it.org/	1
2.	ArchiveSocial	https://archivesocial.com/	2
3.	Sprinklr	https://www.sprinklr.com/	2
4.	Hootsuite	https://www.hootsuite.com/	2
5.	Khoros	https://khoros.com/	1
6.	ThinkUp	https://www.thinkupapp.com/join/	1

Archive-It is a web-based application that captures and preserves dynamic web materials. Similarly, ArchiveSocial is another web-based application that supports the constant capture, preservation, and disposition of SM content from certain SM platforms.

Sprinklr and Hootsuite are SM management software applications. However, Hootsuite does offer specific add-on RM functionalities via other service providers that can capture, preserve and apply disposition to SM content. Khoros is a digital customer engagement platform that has a SM management tool. Finally, ThinkUp was an open-source web application that provided users insights into their activity across Twitter, Facebook, and Instagram, but this application no longer exists.

## Social Media Platform Export Tools

Many SM platforms currently offer users the capability to export and download most types of SM content. However, this feature only provides users with content generated or posted by the specified SM account. Consequently, when agencies rely on native SM export tools, they only capture SM content posted by their SM accounts and are not preserving any SM content received from other platform users. Therefore, if any agency received comments, direct messages, or allowed live chat threads during a live stream, this SM content is not included in the SM archive download.

**Finding 11:** Agencies are not confirming whether the exports provided by SM platforms contain complete SM records.

**Recommendation 11:** Agencies must evaluate whether exports created by SM capture tools sufficiently provide all SM content to reflect a complete SM record, and must develop alternative methods to capture any SM content unavailable from downloaded SM platform archives.

### Social Media Management Applications

SM management applications like Sprinklr, Hootsuite, and Khoros help manage users' presence and engagement on various SM platforms. SM management includes publishing/posting content, responding to comments and direct messages, social monitoring and listening, and analyzing multiple SM performance metrics.

These applications allow for scheduled posting of SM content, allowing users to centralize, monitor and manage content and activities across numerous SM networks from one place. SM management applications offer a variety of functionalities in the form of subscription packages and a la carte features to support different business objectives.

During the assessment, NARA reached out to each third-party application service provider that participating agencies reported using to learn whether and how these applications supported electronic records management (ERM) of agencies' SM content.

Interviews with providers revealed that some applications had archival, disposition, and even ediscovery capabilities, and some did not. Generally speaking, the identified SM management platforms did not offer users ERM features. However, one service provider indicated that it did offer its users ERM functionalities as an a la carte feature via other vendors who offer enterprise information archiving (EIA) services.

### **Enterprise Information Archiving**

The third-party applications/services used by participating agencies, such as Archive-It and ArchiveSocial, are examples of web-based information archiving products. When agencies consider how to preserve and manage SM records, they should consider taking an enterprise-wide, automated approach.

EIA is a methodology that uses technology, via software applications/tools and digital services, to centralize capture, storage, and organization of structured and unstructured enterprise-wide data like file shares, web content, and electronic communications, such as email, collaboration applications, short message/messaging service (SMS), SM posts, and SM messages.

EIA applications/tools allow users to capture, archive, access, and audit large quantities of enterprise data from one place. EIA product features include automated data capture, data deduplication across multiple content types, retention management, content indexing, and tools for data classification and e-discovery.

When using EIA solutions to manage SM records, these tools often connect directly to SM platforms to capture and preserve various types of SM content that an organization posts and engages with, in context, in near-real-time, and in downloadable formats that are human-readable.

**Finding 12:** Some agencies asserted that the third-party application/service they used was capturing its SM records for retention and disposition. However, some applications did not offer sufficient ERM capabilities or required users to separately elect and pay for a la carte services to get ERM features, but most agencies did not pay for such services.

**Recommendation 12:** If an agency relies on a third-party application/service to capture and manage its SM records, the agency must assess and confirm that the service provider offers ERM functionalities that sufficiently captures, preserves, and maintains its SM records per federal recordkeeping requirements. These records must be managed throughout their lifecycle and ensure that the application can maintain and export its SM records in file formats that meet NARA's format guidance for transferring permanent electronic records.

#### **CONCLUSION**

SM platforms - and how agencies use these platforms - is an ever-evolving reality that presents several variables that make capturing and managing SM records challenging. All federal agencies must adhere to the recordkeeping mandates and best practices outlined in NARA Bulletin 2014-02: Guidance on Managing Social Media Records. Federal agencies should evaluate how it uses SM platforms, define what constitutes their SM records, and how those records are preserved and managed, taking into consideration each of the findings and recommendations in this report. Agencies should also consider dedicating more resources to IT solutions that automate records retention of SM records. **Appendix E** provides a list of additional resources regarding the successful management of SM records, and **Appendix F** is a list of electronic message, SM, and website data capture applications/tools.

# APPENDIX A

# **Table 2. List of Participating Agencies**

Agency
Department of Defense - Public Affairs Office for the Office of the Secretary of Defense
Department of Education
Departmentof Health and Human Services - Centers for Disease Control
Department of Homeland Security
Department of Interior - United States Geological Survey
Library of Congress
National Aeronautics and Space Administration
National Archives and Records Administration
National Endowments for the Arts
Small Business Administration

# APPENDIX B

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No. Questions	Agency A	Agency B	Agency C
Does the agency maintain any of the following forms of social media:			Web Publishing platforms are defined as web content management systems. Governance structures place technical oversight for these systems with the Office of the Chief Information Officer. Content oversight rests with the Office of Communications. The agency's definition of web publishing does Not include social media sites such as Twitter, though the agency maintains many Twitter accounts. The agency's primary enterprise website is hosted across three web publishing platforms: WordPress, Drupal, and TeamSite. The agency maintains one primary enterprise-level blog, which is currently hosted on WordPress. Many program offices within the agency maintain a section of their website that may be labeled as a blog. All are one-way, push communication vehicles.
1a Web Publishing: Websites that allow users to post or publish content to reach a large audience and gain feedback, like blogs and microbloggs.	Yes	Yes	Yes
1b List all web publishing platforms in active use?	Wordpress blogs, Medium, Twitter	Wordpress blogs, Tumblr, Twitter	Twitter, Medium, WordPress
1c Social Networking: Websites that allow users to establish connections and share information with one aNother. A social networking service consists of a representation of users via a user profile.		Yes	Yes
1d List all social networking platforms in active use?	Facebook, LinkedIn, Instagram	Facebook, Instagram, LinkenIn	Facebook, Twitter, Instagram, LinkedIn, GitHub, and SnapChat (while Not active, the account is Not defined as retired)
1e <b>File Sharing:</b> A file sharing service is specifically designed to host and share visual and audiovisual media content.	Yes	Yes	Yes
1f List all file sharing platforms in active use?	Flickr, GitHub, Stitcher, Apple Podcasts, Unsplash	Flicr, Giphy, YouTube	YouTube, Flickr, and GitHub. Note: The agency does not define these platforms as file-sharing platforms
1g <b>Discussion Forum:</b> An online platform used for sharing, finding, and discussing different kinds of information, opinions, and news.	Yes	No	Yes
1h List all discussion forum platforms in active use?	Medium, HistoryHub, GitHub		Reddit and Medium
li <b>Bookmarking &amp; Content Curation Networks:</b> Social bookmarking and content curation networks are websites in which users curate, share and	Yes	Yes	No
1j List all bookmarking & content curation platforms in active use?	Flickr, Pinterest, Unsplash, Thingaverse	Pinterest	Note: The agency would define Instagram as this type of platform
1k Please list any other types of social media platforms in active use?	Email newsletters and RSS alerts		N/A
Which program office(s) are responsible for managing agency social media usage?	Office of the Chief Information Officer, Office of Communications, and Office of the General Counsel. Content creation is decentralized. However, agency employees are authorized and trained to create and publish content, including content created by designated individuals assigned to any social media projects. Service units involved in social media projects manage their social media usage.	The Office of Media Communications (SC) team writes the policy, leads the social media community of practice, oversees account creation, provides technical support, and administers the automated real-time social media archiving/RM tool. Individual program offices are responsible for creating and posting content on their social media channels.	
3 Does the agency have a social media working group?	Yes	Yes	Yes

No. Questions	Agency A	Agency B	Agency C
3a If yes, which agency stakeholders are represented in the social media working group?	Office of the Chief Information Officer, Office of Communications, Office of the General Counsel, and others participate periodically, as needed	duties. Additionally, any interested staff member is welcome to attend these open meetings.	The Office of Communications leads an internal social media community of practice. It is an opt-in group that contains any individual who maintains an official social media account. Additionally, there is one program office that created its own independent social media working group, the Digital Engagement Team to manage there unique social media needs.
4 Does the agency have any policies, directives, and guidance specifically	Yes	Yes	Yes
5 Is the agency 's RM Program involved in the development of social media policies, directives and guidance?	Yes	Yes	Yes and No
6 Is the agency 's RM Program consistently made aware of which social media platforms are in active use?	Yes	Yes	No
7 Has the agency communicated to the public how the agency uses and manages social media content?	Yes	Yes	Yes
8 Does the agency regularly monitor the ongoing use of social media	Yes	Yes	Yes
9 Has the agency developed specific clauses in a Terms of Service Agreement with any social media service providers?	Yes		No for all social media accounts managed by the Office of Communications. Yes for specific social media accounts managed by the Digital Engagement Team
9a If yes, please list which providers?	Flickr, Apple for iTunes	YouTube, Tumblr, Pinterest, LinkedIn, Flickr, Facebook	Meta, LinkedIn, Twitter, and YouTube
Has the agency developed any standard operating procedures for social media usage?	Yes	Yes	Yes
11 Has the agency specifically defined ownership of social media content?	Yes	Yes	Yes
Does the agency regularly monitor changes to service providers' Terms of Service on social media platforms and assess how they may affect the ownership, accessibility or management of social media content?	Yes	Yes	Yes for those accounts managed by the Digital Engagement Team
13 Does the agency allow for public comments on the agency social media	Yes	Yes	Yes
13a If yes, list which social media accounts.	WordPress, Facebook, LinkedIn, Flickr, Medium, Instagram, HistoryHub, YouTube (rarely), GitHub, Apple Podcasts	Facebook, Instagram, Twitter, Tumblr, Pinterest, most blogs	All
14 Does the agency respond to received comments made on the agency social media accounts?	Yes		No for all social media accounts managed by the Office of Communications. Yes for specific social media accounts managed by the Digital Engagement Team
14a If yes, list which social media accounts.	WordPress, Facebook, LinkedIn, Flickr, HistoryHub, YouTube (rarely), GitHub	Facebook, Instagram, Twitter, Tumblr, Pinterest, most blogs	Twitter, Facebook, Instagram, LinkedIn, YouTube
15 Does the agency receive direct messages from any the agency social media	Yes	Yes	Yes
15a If yes, list which social media accounts.	Facebook	Facebook, Instagram, Twitter, Tumblr, Pinterest, most blogs	On platforms that allow for direct messaging.
16 Does the agency respond to received direct messages from any of the agency's social media accounts?	Yes		No for all social media accounts managed by the Office of Communications. Yes for specific social media accounts managed by the Digital Engagement Team
16a If yes, list which social media accounts.	Facebook	Facebook, Instagram, Twitter, Tumblr, Pinterest, most blogs	Instagram

No. Questions	Agency A	Agency B	Agency C
17 Does the agency capture and preserve any of the following:			Yes, for all accounts that have been closed. However, it is agency practice to maintain accounts as active and online unless otherwise necessary.
17a Published content for all the agency social media accounts	No	Yes	Yes
17b Received public comments	Flickr	Yes	Yes
17c The agency's responses to comments	Flickr	Yes	Yes
17d Received direct messages	Twitter	Yes	Yes
17e The agency's responses to direct messages	No	Yes	Yes
18 Does the agency use any third-party applications/services to capture and preserve social media content, comments, and/or direct messages?	Yes	Yes	No for all social media accounts managed by the Office of Communications. Yes for specific social media accounts managed by the Digital Engagement Team
18a If yes, name the third-party application/service used.	Selective use of native social media tools and Hootsuite for selected content collections	ArchiveSocial	In the past, the Office of Communications archived one former senior official's social media content using Archive-IT, and currently, the Digital Engagement Team utilizes Khoros
19 Has the agency's RM Program specifically defined what social media content are federal records?	Yes	Yes	Yes
20 Does the agency have an agency-specific records schedule for social media records?	Yes	Yes	Yes
20a If yes, please list the disposition authority number for the records schedule covering social media records.	3 disposition authorities listed	1 disposition authoritiy listed	1 disposition authoritiy listed
21 Has the agency classified any social media records as permanent records?	Yes	Yes	Yes
21a If yes, please list which social media records are permanent records.	Guest blog posts by members of the agency's Executive Committees and policy records or correspondence, memoranda, reports, forms, and other records accumulated by agency staff related to substantive program subject files.	Original content posted on external webites and social media	Items that fall under item a in the listed disposition authority, as those records cover mission-related or substantive agency activities
Does the agency use GRS 6.4, item 020, for the disposition of social media records?	No	Yes	Yes for all social media accounts managed by the Office of Communications. No for specific social media accounts managed by the Digital Engagement Team
23 Has the agency defined clear responsibilities to specific agency staff/program office(s) for managing social media records?	Yes		Yes
23a If yes, please list which specific agency staff/program office(s) are responsible for managing social media records.	The Responsible Content Authors (RCAs) in the agency's program offices are responsible for the records they create, including social media. The agency's RM Division resides within the OCIO and guides all RCAs.	The agency's RM Program has not explicitly defined responsibilities, but the SC team currently administers the ArchiveSocial tool on behalf of all agency content creators. Content creators may be asked to reconnect accounts disconnected for technical reasons but otherwise do not have responsibility for RM of accounts covered by ArchiveSocial, including Facebook, Flickr, Instagram, LinkedIn, Pinterest, Twitter, and YouTube. Tumblr owners are responsible for creating screenshots at the point of project retirement, as ArchiveSocial does not currently support this platform. Blogs are self-hosted on the agency's AWS cloud, and the HTML can be downloaded for RM purposes when needed but is not easily human-readable.	

No. Questions	Agency A	Agency B	Agency C
24 Has the agency created any standard operating procedures for capturing an managing social media records for disposition?		Yes	Yes for all social media accounts managed by the Office of Communications. No for specific social media accounts managed by the Digital Engagement Team
Does the agency have any training for agency personnel regarding capturing preserving, and disposing of social media records?	g, Yes	Yes	No
26 Does the agency store and manage all social media records outside of social media platforms?	Not presently, but the agency's social media records will be integrated within the agency's new Records Management System starting fall 2023.	Yes	No

No.	Questions	Agency D	Agency E	Agency F
1	Does the agency maintain any of the following forms of social media:			
1a	Web Publishing: Websites that allow users to post or publish content to reach a large audience and gain feedback, like blogs and microbloggs.	Yes	Yes	No
1b	List all web publishing platforms in active use?	Wordpress, Twitter	Wordpress blogs	
1c	<b>Social Networking:</b> Websites that allow users to establish connections and share information with one aNother. A social networking service consists of a representation of users via a user profile.	Yes	Yes	Yes
1d	List all social networking platforms in active use?	Facebook	Facebook, Twitter, Instagram, LinkedIn, Pinterest, Snapchat	Facebook, Instagram, Twitter, LinkedIn
1e	<b>File Sharing:</b> A file sharing service is specifically designed to host and share visual and audiovisual media content.	Yes	Yes	Yes
1 f	List all file sharing platforms in active use?	Flickr, YouTube	YouTube and there maybe others not known	YouTube
1g	<b>Discussion Forum:</b> An online platform used for sharing, finding, and discussing different kinds of information, opinions, and news.	Yes	No	No
1h	List all discussion forum platforms in active use?	IdeaScale		
1i	<b>Bookmarking &amp; Content Curation Networks:</b> Social bookmarking and content curation networks are websites in which users curate, share and bookmark other users visual information.	No	No	No
1j	List all bookmarking & content curation platforms in active use?			
1k	Please list any other types of social media platforms in active use?			
2	Which program office(s) are responsible for managing agency social media usage?	The Office of Public Affairs		The agency Headquarters (HQ), field, and some program offices that are managed by politicals
3	Does the agency have a social media working group?	Yes	Yes	Yes
3a	If yes, which agency stakeholders are represented in the social media working group?	Agency headquarters and component public/external affairs staff assigned to social media operations	The Office of Communications and all agency program offices have a representative	This is primarily a training forum for our field operations on best practices and how-to sessions managed by the HQ Digital team
4	Does the agency have any policies, directives, and guidance specifically related to social media?	Yes	Yes	Yes
5	Is the agency 's RM Program involved in the development of social media policies, directives and guidance?	Yes	Yes	No
6	Is the agency 's RM Program consistently made aware of which social media platforms are in active use?	Yes	No	No
7	Has the agency communicated to the public how the agency uses and manages social media content?	Yes	Yes	No
8	Does the agency regularly monitor the ongoing use of social media platforms?	Yes	Yes	Yes
9	Has the agency developed specific clauses in a Terms of Service Agreement with any social media service providers?	No	No	No

No.	Questions	Agency D	Agency E	Agency F
9a If yes, please	e list which providers?		Uses GSA created ToS agreements	
10 Has the agen media usage	ncy developed any standard operating procedures for social?	Yes	Yes	Yes
11 Has the agen	ncy specifically defined ownership of social media content?	Yes	Yes	Yes
Service on so	ency regularly monitor changes to service providers' Terms of ocial media platforms and assess how they may affect the accessibility or management of social media content?	Yes	No	Yes
13 Does the age accounts?	ency allow for public comments on the agency social media	Yes	Yes	Yes
13a If yes, list wl	hich social media accounts.	All	All	Facebook, Instagram, Twitter, LinkedIn, YouTube
14 Does the age	ency respond to received comments made on the agency social nts?	Yes	Yes	Yes
14a If yes, list wl	hich social media accounts.	All	Potentially on all, but not regularly	Facebook, Instagram, Twitter, LinkedIn, YouTube
15 Does the age accounts?	ency receive direct messages from any the agency social media	Yes	Yes	Yes
15a If yes, list wl	hich social media accounts.	AII	The agency receives direct messages on all social media channels. However, the agency does not respond to direct messages received via these channels.	Twitter
	ency respond to received direct messages from any of the ial media accounts?	Yes	Yes	Yes
16a If yes, list wl	hich social media accounts.	All		Twitter
17 Does the age	ency capture and preserve any of the following:			
17a Published co	ontent for all the agency social media accounts	Yes	Yes	No
17b Received pul	blic comments	Yes	Yes	No
17c The agency's	s responses to comments	Yes	Yes	No
17d Received dir	rect messages	Yes		No
17e The agency's	responses to direct messages	Yes	Yes	No
	ency use any third-party applications/services to capture and ial media content, comments, and/or direct messages?	No	Yes	No
18a If yes, name	the third-party application/service used.		ArchiveSocial	
	ncy's RM Program specifically defined what social media ederal records?	Yes	No	No

No.	Questions	Agency D	Agency E	Agency F
	Does the agency have an agency-specific records schedule for social media records?	Yes	No	No
	If yes, please list the disposition authority number for the records schedule covering social media records.	1 disposition authoritiy listed		
21	Has the agency classified any social media records as permanent records?	No	Yes	No
21a	If yes, please list which social media records are permanent records.	No	Agency Directors' social media accounts	
	Does the agency use GRS 6.4, item 020, for the disposition of social media records?	Yes	No	No
	Has the agency defined clear responsibilities to specific agency staff/program office(s) for managing social media records?	Yes	No	No
	If yes, please list which specific agency staff/program office(s) are responsible for managing social media records.	The Office of Public Affairs and its appointed records liaisons are provided records training quarterly by RM Program staff.		
	Has the agency created any standard operating procedures for capturing and managing social media records for disposition?	No	Yes	No
	Does the agency have any training for agency personnel regarding capturing, preserving, and disposing of social media records?	No	No	Yes
	Does the agency store and manage all social media records outside of social media platforms?	No	Yes	No

No.	Questions	Agency G	Agency H	Agency I	Agency J
1 Does	s the agency maintain any of the following forms of social media:				
	Publishing: Websites that allow users to post or publish content to ha large audience and gain feedback, like blogs and microbloggs.	Yes	Yes	Yes	Yes
1b List a	all web publishing platforms in active use?	Twitter, Tumblr, Medium	Twitter, WordPress Blog	Twitter, WordPress Blog	Twitter
share	al Networking: Websites that allow users to establish connections and e information with one aNother. A social networking service consists of a esentation of users via a user profile.	Yes	Yes	Yes	Yes
1d List a	all social networking platforms in active use?	Facebook, Instagram, LinkedIn	Facebook, Instagram	Facebook, Snapchat, Instagram, YouTube, Tumblr, Pinterest, Twitter, LinkedIn, GIPHY, Flickr, Twitch, Reddit, Dailymotion, Soundcloud	Facebook, Instagram, LinkedIn, YouTube
	<b>Sharing:</b> A file sharing service is specifically designed to host and share al and audiovisual media content.	Yes	Yes	Yes	Yes
1f List a	= =	YouTube, Flickr, Giphy, Apple Podcasts, Google Podcasts	YouTube	Flickr, YouTube, Giphy, Soundcloud, Apple podcasts, Google Podcasts	Flickr, YouTube
_	ussion Forum: An online platform used for sharing, finding, and assing different kinds of information, opinions, and news.	Yes	No	Yes	No
1h List a	all discussion forum platforms in active use?	Medium		Reddit	
conte	kmarking & Content Curation Networks: Social bookmarking and ent curation networks are websites in which users curate, share and cmark other users visual information.	No	No	Yes	No
1j List a	all bookmarking & content curation platforms in active use?			Pinterest	
1k Pleas	se list any other types of social media platforms in active use?	GitHub			
2 Which usage		The Office of Communications	The Office of Public Affairs	The Office of Communications	The Office of Media
3 Does	s the agency have a social media working group?	No	No	Yes	Yes
3a If yes	s, which agency stakeholders are represented in the social media working p?			Social media managers, public affairs officers, mission experts, agency programsetc.	The agency and seven agency components
	s the agency have any policies, directives, and guidance specifically ed to social media?	Yes	Yes	Yes	Yes
	e agency 's RM Program involved in the development of social media cies, directives and guidance?	Yes	No	Yes	Yes
	e agency 's RM Program consistently made aware of which social media forms are in active use?	No	No	No	Yes
	the agency communicated to the public how the agency uses and ages social media content?	No	Yes	Yes	Yes
	s the agency regularly monitor the ongoing use of social media forms?	Yes	Yes	Yes	Yes
	the agency developed specific clauses in a Terms of Service Agreement any social media service providers?	No	No	Yes	No
9a If yes	s, please list which providers?			All Google-owned platforms, and all Appleowned platforms	
10 Has t usage	the agency developed any standard operating procedures for social media e?	Yes	Yes	Yes	Yes
11 Has t	the agency specifically defined ownership of social media content?	Yes		Yes	Yes

No. Questions	Agency G	Agency H	Agency I	Agency J
Does the agency regularly monitor changes to service providers' Terms of Service on social media platforms and assess how they may affect the ownership, accessibility or management of social media content?	Yes	No	Yes	No
13 Does the agency allow for public comments on the agency social media accounts?	Yes	Yes	Yes	Yes
13a If yes, list which social media accounts.	Facebook, Instagram, Flickr, Tumblr, Medium	Facebook, Twitter, Instagram, YouTube	Facebook, Twitter, Instagram, YouTube, Twitch, Tumblr, Reddit, LinkedIn	
14 Does the agency respond to received comments made on the agency social media accounts?	Yes	Yes	Yes	No
14a If yes, list which social media accounts.	Facebook, Instagram, Flickr, Tumblr, Medium	Facebook, Twitter, Instagram, YouTube	Facebook, Twitter, Instagram, YouTube, Twitch, Tumblr, Reddit, LinkedIn	
15 Does the agency receive direct messages from any the agency social media accounts?	Yes	Yes	Yes	Yes
15a If yes, list which social media accounts.	Facebook, Instagram, Flickr	Twitter, Instagram	Twitter and Instagram	Facebook, Instagram, LinkedIn, YouTube, Twitter
16 Does the agency respond to received direct messages from any of the agency social media accounts?	s Yes	Yes	Yes	No
16a If yes, list which social media accounts.	Facebook, Instagram, Flickr	Twitter, Instagram	Twitter and Instagram	
17 Does the agency capture and preserve any of the following:				
17a Published content for all the agency social media accounts	No	No	Yes	Yes
17b Received public comments	No	No	Yes	No
17c The agency's responses to comments	No	No	Yes	No
17d Received direct messages	No	No	Yes	No
17e The agency's responses to direct messages	No	No	Yes	No
18 Does the agency use any third-party applications/services to capture and preserve social media content, comments, and/or direct messages?	No	No	Yes	No
18a If yes, name the third-party application/service used.			Sprinklr	No
19 Has the agency's RM Program specifically defined what social media content are federal records?	No	No	Yes	Yes
Does the agency have an agency-specific records schedule for social media records?	No	No	No	Yes
20a If yes, please list the disposition authority number for the records schedule covering social media records.				6 disposition authorities listed
21 Has the agency classified any social media records as permanent records?	No	No	Yes	Yes
21a If yes, please list which social media records are permanent records.			Senior agency officials and other specific positions who have agency social media accounts	Social media accounts associated with capstone officials
Does the agency use GRS 6.4, item 020, for the disposition of social media records?		No	Yes	Yes
23 Has the agency defined clear responsibilities to specific agency staff/program office(s) for managing social media records?	No	No	Yes	Yes
23a If yes, please list which specific agency staff/program office(s) are responsible for managing social media records.			Social media admins are responsible for managing the records of the accounts they have administrative access to	Digital Media Director/Staff

No. Questions	Agency G	Agency H	Agency I	Agency J
24 Has the agency created any standard operating procedures for capturing and managing social media records for disposition?	Yes	No	Yes	No
Does the agency have any training for agency personnel regarding capturing preserving, and disposing of social media records?	Yes	No	Yes	Yes
26 Does the agency store and manage all social media records outside of social media platforms?	Yes	No	Yes	Yes

# **APPENDIX C**

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APPENDIX C Color	Document Category	The following tables list and categorize documentation agencies submitted and NARA reviewed during the assessment. Please note that the identity of each agency is withheld, as is customary for all NARA's assessment reports.  Description of Documents in Category
Green	A	Policies, directives, and memorandums
Purple	В	Standard operating procedures, guides/ guidance/ guidelines, handbooks, cheat sheets, tips, training slides, web pages, templates, and forms
Magenta	С	NARA approved agency records schedules
Blue	D	Social media terms of services agreements (ToS)
Orange	E	Reports, program charters, and other federal guidance/regulations

No.	Agency 1	Agency 2	Agency 3
1	Social Media Policy	Social Media Directive on Social Media Use	Privacy Policy for Operational Use of Social Media
2	Social Media Comment and Posting Policy	Comment Policies for Social Media Sites	Social Media Moderation / Comment Policy
3	Using the Internet, Computers and Electronic Communications Systems Policy	Social Media Procedures Handbook	Privacy Policy for Operation Use of Social Media Instructions
4	General Standards of Conduct Policy	Procedures for Managing Permanent Electronic Records	Information Technology Security Program, Sensitive Systems: Social Media Guide
5	Adding New Responsible Content Authors to a Blog or Other Social Media Account Guidance	Rules of Behavior for Using Web 2.0 and Social Media Sites and Responsibilities for Content Management	Disposition of Official Social Media Accounts Memorandum
6	Digital Accessibility Document Basics Guide	Engagement and Public Affairs Records Records Schedule	Social Media Quick Reference Guide
7	Digital Accessibility Image Description Guide	Twitter ToS	Social Media Guidance Planning
8	Digital Accessibility WordPress Guide YouTube ToS		Social Media Business Case Guide
9	Guidelines for Creating and Maintaining a Blog	Pinterest ToS	Social Media Plan Guide
10	Blog Guidelines for Guest Authors	Flickr ToS	Social Media Working Group Web Page (screen capture)
11	Facebook Page Communications Guidelines	Flickr Amended ToS	Social Media Directory Web Page (screen capture)
12	Twitter Communications Guidlelines	Facebook ToS	Social Media Guidance Planning Web Page (screen capture)
13	Micro-Video Requirements for Responsible Video Content Authors	Giphy ToS	Social Media Policy for Agency Employes Web Page (screen capture)
14	Requesting Approval of a New External-Facing Social Media Account Guide	LinkedIn Amended ToS	Application for an Official Social Media Account Web Page (screen capture)
15	Using Images on Agency Social Media (slides)	Instagram Amended ToS	Accessing Social Media at Agency Web Page (screen capture)
16	Using Pictures in Blog Posts Tips (slides)	Tumblr ToS	Social Media and Information Sharing Websites Records Schedule
17	Social Media Temp Records Spreadsheet Template		
18	Permission and Release – Blog Posts Contract Template		
19	Annual Social Media Assessments Form		
20	Social Media Communications & Business Plan Template		
21	Mission and Organization Records Schedule	-	

No.	Agency 1	Agency 2	Agency 3
22	Information Technology: Social Media Records Schedule		
23	Chatfuel ToS		
24	Facebook ToS		
25	Flickr Amended ToS		
26	Github ToS		
27	WordPress Amended ToS		
28	LinkedIn ToS		
29	YouTube ToS		
30	Social Media Analytics Report - May 2022		
31	Information Technology Product Governance Board Charter		
32	36 CFR 701.7 - Certain terms and license agreements		

No.	Agency 4	Agency 5	Agency 6
1	Public Affairs Directive	Requirements for Management of Records in E-mail, Cloud, and Social Media Policy	Digital Media Policy
2	Official Use of Social Media Policy	Release of Information to News and Information Media Policy	Digital Media Guide
3	Online Information Management and Electronic Messaging Policy	Acceptable Use of Government Office Property Including Information Technology Policy	Comment Policy Web Page (screen capture)
4	Records and Information Management Program Administrative Instruction	Employee Public Communications and Conduct in the Digital Age Guidance	Social Media Policies Cheatsheet Web Page (screen capture)
5	Disposition of Official Social Media Accounts Memorandum	Social Media at Agency Web Page (screen capture)	Social Media Accounts Approvals Web Page (screen capture)
6	Waiver of Terms of Service Agreement Requirements Memorandum	List of all agency records schedules	Rules for Following and Engaging with Accounts Web Page (screen capture)
7	Guidance on Transition and Archiving of Official Social Media Accounts Memorandum	List of records schedules associated with social media records	Expected Use of Social Media Accounts Web Page (screen capture)
8	Procedures for Archiving Social Media Accounts	Social Networking Use - Privacy Impact Assessment (report)	
9	Social Media Education and Training Web Pages (screen capture)	Federal Chief Information Officers: Guidelines for Secure Use of Social Media by Federal Departments and Agencies	
10	Public Affairs Records Schedule		
	Public Affairs Planning and Guidance Files Records Schedule		
12	Visual Information Records Schedule		
13	Revised Administrative Instruction Records Schedule		
14	FAR 52.212-4: Contract Terms and Conditions—Commercial Products and Commercial Services		

No.	Agency 7	Agency 8	Agency 9	Agency 10
1	Digital Media Style Guide	Social Media Policy	Social Media Policy	Social Media Directive
2		Office of the Assistant Secretary for Public Affairs Guidance: ArchiveSocial	Web Content Management Policy	
3	Social Media Response Tree	Facebook Guidelines	Social Media Playbook	
4	Digital Media Guide for Employees	Twitter Guidelines	Communications Records Records Schedule	
5	Photography Best Practices			
6	Image Accessibility Guidance			

Agency ID No.	Documents in Category A	Documents in Category B	Documents in Category C	Documents in Category D	Documents in Category E
Agency 1	4	16	2	7	3
Agency 2	1	4	1	10	0
Agency 3	3	12	1	0	0
Agency 4	7	2	4	0	0
Agency 5	3	2	2	0	2
Agency 6	1	6	0	0	0
Agency 7	0	6	0	0	0
Agency 8	1	3	0	0	0
Agency 9	2	1	1	0	0
Agency 10	1	0	0	0	0

# APPENDIX D

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APPENDIX D

The following reference table was created to illustrate agency compliance with NARA Bulletin 2014-02.

Please note that the identity of each agency is withheld, as is customary for all NARA's assessment reports.

No.	Mandated Requirement	Agency I	Agency II	Agency III	Agency IV	Agency V	Agency VI	Agency VII	Agency VIII	Agency IX	Agency X
1	The agency has defined what social media content is the official social media record.	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>&gt;</b>	<b>&gt;</b>		<b>✓</b>	<b>&gt;</b>	
2	The agency has determined how social media records will be managed.	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>~</b>	<b>✓</b>		~	<b>✓</b>	
3	The agency has assigned specific roles to ensure social media records are identified, managed, and captured.	<b>✓</b>	<b>✓</b>	<b>~</b>	<b>✓</b>	<b>✓</b>			<b>✓</b>	<b>✓</b>	
4	The agency has outlined specific recordkeeping responsibilities to ensure social media records are identified, managed, and captured.	<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>✓</b>	>			<b>✓</b>		
5	The agency has a social media policy that stipulates the identification, management, preservation, and disposition of all social media records.	<b>&gt;</b>	>	<b>~</b>	~	>			>	>	
6	The agency has defined what social media content is transitory, temporary, and permanent.	<b>~</b>	<	<b>~</b>	<b>~</b>	<b>✓</b>			~		
7	The agency has determined whether an existing disposition authority covers social media records, including the General Records Schedules.	<b>✓</b>	<b>✓</b>		<b>✓</b>	>			<b>✓</b>		
8	The agency has an approved agency-specific records schedule for social media records.		<b>✓</b>	<b>✓</b>	<b>✓</b>	<b>✓</b>			<b>✓</b>		

APPENDIX D

The following reference table was created to illustrate agency compliance with NARA Bulletin 2014-02.

Please note that the identity of each agency is withheld, as is customary for all NARA's assessment reports.

No.	Mandated Requirement	Agency I	Agency II	Agency III	Agency IV	Agency V	Agency VI	Agency VII	Agency VIII	Agency IX	Agency X
9	The agency does not have an applicable records schedule to cover social media records and treat social media records as permanent until the agency can develop one.	<b>&gt;</b>					<b>✓</b>	<			
10	The agency has articulated clear processes to ensure social media records are identified, managed, and captured.	<b>&gt;</b>	>	>	>	<b>\</b>	<b>✓</b>		>	<b>&gt;</b>	
11	The agency provides training to applicable staff on how and when to capture social media records.	<b>~</b>	<b>&gt;</b>			<	<b>✓</b>		<b>&gt;</b>	<b>~</b>	
12	The agency has established and implemented a standard way to manage social media records.	<b>~</b>	>		>	<b>&gt;</b>	<b>✓</b>	>	<b>&gt;</b>	<b>&gt;</b>	
13	The agency is consistently managing social media records per agency guidance.	<b>~</b>	>		<	<b>\</b>			<b>✓</b>	<b>✓</b>	

## **APPENDIX E**

**Table 3. List of Additional Resources** 

No.	Title	Source
1.	White Paper on Best Practices for the Capture of Social Media Records	NARA
2.	Format Guidance for the Transfer of Permanent Electronic Records	NARA
3.	Records Management Solutions	General Services Administration (GSA)
4.	GSA Electronic Records Management Solutions Contractor Listing	GSA
5.	Electronic Records Management Federal Integrated Business Framework	GSA
6.	Electronic Records Capture	NARA Federal Electronic Records Modernization Initiative (FERMI)
7.	Electronic Records Maintenance and Use	FERMI
8.	Electronic Records Disposal	FERMI
9.	Transfer of permanent electronic records from the recordkeeping system	FERMI
10.	Preserving Social Media	Digital Preservation Coalition and Sara Day Thomson
11.	Digital Preservation Handbook	Digital Preservation Coalition
12.	Strategies for managing social media records	New South Wales State Archive
13.	Approaches to managing social media records with long-term retention periods	New South Wales State Archive

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The following table was initially created for NARA's white paper on social media capture. It was expanded in 2017 to include providers that capture and manage electronic messages and list available tools and software applications that could assist federal agencies in implementing strategies for capturing social media content and electronic messages.

No.	Provider	Product Description and Use Cases
1	Aleph Archives	Web archiving service uses CAMA tool for regulatory compliance and e-discovery aimed at corporations to capture, store, and sort web content for e-discovery and regulatory compliance. Provides a number of service plans.
2	Alfresco	Provides content management within the tool. It is unclear if it captures content with related metadata.
3	Archive360	Data Archive Manager: Instead of trying to manually manage and secure the growing number of communications channels and special data such as live journal feeds, the Archive2Azure Messaging solution extends the native security capabilities of your Azure Cloud to help meet your industry-specific regulatory requirements such as retention policies and immutable storage.
4	Archive-It	Subscription service from the Internet archive allows institutions to build, manage and search their own web archive.
5	ArchiveSocial	Automatically captures and archives social media content for compliance, records management, and e-discovery needs.
6	arkiwera (Swedish)	Web archiving: In Arkiwera you can preserve, study and create archival copies of websites. The archival copy is a browseable snapshot that is available offline even if the site has been unpublished. Archiving social media Via Arkiwera you can easily save archival copies of information from your social media accounts. The service supports different kinds of social media and yields interactive copies of your posts, complete with comments and reactions.
7	Backup Buddy (iThemes)	Backup service for WordPress that allows users to create a backup of the entire installation and send to their server, Amazon S3, Rackspace Cloud, FTP, or e-mail. The backup can help users restore and migrate WordPress installations.
8	Backupify	Data Retention for G Suite: Backupify gives users an independent copy of Google Workspace data with automated backups to the Datto Cloud three times a day (with the option to force a backup at any time). It also provides more comprehensive coverage than Google services. In addition to email, Backupify protects users' contacts, Drive, documents, calendars, and Google Sites.  Data Retention for Office 365: The recommended approach is to have a solution that allows for individual item, file, and container level backup and restores. This allows both end users and administrators the ability to work without worrying that their critical business files and data could disappear at any time without a chance of recovery.

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No.	Provider	Product Description and Use Cases
9	Barracuda Sonian	Archive electronic communications: Preserve every inbound and outbound email and file attachment in the secure and dynamically scalable archive. Search them quickly. Find and access exactly what you need in seconds with fast and accurate search tools. Act as needed. Filter, tag, and export relevant content to meet legal, compliance, and corporate governance demands.
10	<u>Bulkr</u>	Bulkr is a desktop app to backup, browse & download photos & videos on Flickr.
11	<u>Data443</u>	Service captures data from various locations and sources, including email, attachments, system files, MS SharePoint, and social media among other electronic information. Users can search and retrieve data and place litigation holds pertaining to a particular case or instance.
12	Downloadr (Softonic)	Windows app that allows users to download photos from Flickr to their computer.
13	Downstagram (GitHub)	Downstagram is a simple command line tool to download and backup all your Instagram photos and videos.
14	Erado, an opentext Company	Offers email, social media, and instant message archiving to comply with FINRA, SEC, Sarbanes-Oxley, Gramm-Leach-Bliley, FERC, NERC, and HIPAA.
15	Facebook Download service	Facebook provides a backup of a user's profile, including content posted to timeline, photos and videos uploaded to account, friend lists, user-created Notes, RSVP'd events, sent and received messages, any comments made on timeline posts, photos, and other timeline content. Users can also request an enhanced archive that contains additional information.
16	Flickr API	Flickr provides an open Application Programming Interface (API) so Flickr can communicate with other software or tools. Flickr also provides RSS feeds of updates to content.
17	Free YouTube Download	Software allows download of single YouTube videos or a batch of all of the videos of a selected YouTube user or channel.
18	Global Relay	Global Relay Archive captures electronic messages, social media, and web content in real-time and creates a copy of each message, which is then indexed, serialized, and time/date stamped. Users can access and search archived content.

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No.	Provider	Product Description and Use Cases
19	Hanzo Archives	Offers commercial web archiving services for regulatory compliance, litigation-support, and e-discovery. Subscribers can manage their web archives according to their RM policies with associated metadata.
20	Hearsay Social	Hearsay Social's compliance module provides workflow management, monitoring, and capture of social media from a central dashboard.
21	<u>Hootsuite</u>	Provides a social media dashboard for managing multiple accounts. Users can spread messages across networks, monitor keyword mentions in streams, and track results with built-in click-through stats and integrated Google Analytics.
22	If this, then that	Users give it tasks by putting one channel's trigger together with another channel's action. Tasks are executed every 15 minutes and can be turned on or off and shared with others.
23	iMazing	iMazing is a mobile device management software that allows users to transfer files and data between iOS devices and macOS or Windows computers, in addition to many other features beyond the scope of what Apple's own tools enable.
24	<u>Intradyne</u>	Intradyn's Social Media Archiver captures all of your social media content in evidentiary quality, retaining the content and keeping it suitable for compliance and litigation preparedness purposes. All content is digitally signed (256-bit) and time-stamped which satisfies legal requirements for submitting digital content as evidence according to the Federal Rules of Evidence.
25	iPhone SMS Export	SMS Export is an application for Windows and Mac you can use to copy the text messages (SMS) from your iPhone directly to your PC. The software is able to convert the SMS database to EXCEL, TEXT, CSV and HTML formats, giving thus the possibility to browse them easily from your computer using any application like a text editor or Microsoft Excel.
26	<u>Jatheon</u>	This application supports intended to capture, index and store email, instant messages, social media content, text messages, call,s and voicemail to enable organizations to respond to eDiscovery requests and meet various regulatory compliance requirements such as Sarbanes Oxley, HIPAA, and others. The email archiving appliances are installed in an organization's network and capture messaging traffic within the network. The products are compatible with all major mail servers, including Exchange, Office 365, Groupwise, Gmail and IBM Lotus, etc.

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No.	Provider	Product Description and Use Cases
27	Micro Focus Unified Archiving	Archive email, social collaboration, and mobile data from multiple platforms in a single location. OpenText <sup>™</sup> Retain Unified Archiving supports Exchange, Microsoft 365, Gmail, Bloomberg, and OpenText <sup>™</sup> GroupWise for both on-premises and cloud deployments.
28	Microsoft Purview	Microsoft Purview provides a unified data governance solution to help manage and govern your on-premises, multicloud, and software as a service (SaaS) data. Easily create a holistic, up-to-date map of your data landscape with automated data discovery, sensitive data classification, and end-to-end data lineage. Enable data consumers to access valuable, trustworthy data management.
29	<u>MirrorWeb</u>	Website Archiving: Captures with MirrorWeb Insight, you can seamlessly review all captured content in its original format, with images, videos, and attachments displayed inline. Our platform supports numerous major social media and communication platforms, including Twitter, LinkedIn, and more.
30	Cloud Preservation by Nextpoint	Cloud Preservation is a subscription service that provides automated, cloud-based capture of web content for marketing, compliance, and litigation-related needs.
31	Ownbackup	Service that provides daily automated backups of social media with unlimited storage.
32	<u>PageFreezer</u>	Pagefreezer's social media archiving solution leverages social media APIs to gather data in real-time, providing the most comprehensive capture of social media content in the industry.
33	<u>Patrina</u>	Captures, indexes, and consolidates social media feeds into a hosted archive as WORM optical, format.
34	<u>Proofpoint</u>	Proofpoint Archive is a cloud-based archiving solution that simplifies your legal discovery and end-user data access. It provides you with a secure and searchable central repository of a wide range of content types without the headaches of managing in-house.
35	SiteSucker for Mac OS X	SiteSucker is a Macintosh application that automatically downloads web sites from the Internet.

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No.	Provider	Product Description and Use Cases
36	Smarsh	Subscription service provides cloud-hosted social media archiving with no installation. Content is captured, preserved and indexed in a Smarsh archive where posts can be searched and retrieved.
37	SMC4 by Integritie	SMC4 enables automated capture, control, communication and compliance of social media. SMC4 workflow has all the features of standard with advanced case management.
38	<u>SocialSafe</u>	A downloadable application which will automatically download content when requested and store it locally on the user's hard drive. No additional storage of content is available elsewhere.
39	SMSBackup+	Automatically backup SMS, MMS and call log entries using a separate label in Gmail / Google Calendar. It is also possible to restore SMS and call log entries back to the phone (MMS not supported yet).
40	TeleMessage	Captures SMS and mobile text messages/mobile content. They are indexed automatically and securely archived per your configuration, with immediate availability for review/supervision, on-demand search and production with other supported electronic communication data. Choose any combination of our Mobile Recording products capture and archive: WhatsApp, WeChat, Telegram, Signal, SMS, MMS, Voice calls.
41	twDocs	Software to save Twitter tweets, favorites, mentions, followers, friends, direct messages and search results as PDF, DOC, XML, CSV, TXT, XLS or HTML files. Try the service for free and save the last 10 elements from twitter list of your choice.
42	Tweet Archivist	Windows application that helps users archive tweets for later data-mining and analysis.
43	Tweetstream	TweetStream provides simple Ruby access to Twitter's Streaming API using open authorization.
44	<u>TwInbox</u>	Twitter add-on for Outlook email with searching and grouping capabilities as well as graphs of usage statistics.
45	Twitter API through manual backup	By submitting queries to the Twitter API, users can backup their data manually, including the data of all the people followed and user tweets.
46	Twitter Archive Download	Users can request a copy of their Twitter Archive from Twitter. The ZIP file includes user tweets and retweets.

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No.	Provider	Product Description and Use Cases
	Twitter Archiving Google Spreadsheet (TAGS)	Script that allows users to pull data from Twitter's API and save it in a Google Spreadsheet. This free Google sheet template explains how to set up and run an automated collection of search results from Twitter.
48	Twitter Backup	Downloadable software that captures all tweets and provides them in XML. Uses a document type identical to Twitter's API.
49	<u>Viewpointe</u>	OnPointe for Messaging provides a secure, scalable and automated approach to capture and manage your electronic communications and business content in our private cloud.
50	WARCreate	Google Chrome extension that allows users to create a Web ARChive (WARC) file from any browseable webpage.
51	X1 Social Discovery	X1 Social Discovery collects, authenticates, searches, reviews and produces content. MD5 hash values are calculated upon capture and maintained in native format. Content can be tagged, sorted and exported.