

# NIH RECORDS MANAGEMENT GUIDANCE FOR NIH SOCIAL MEDIA AND WEB RECORDS

*This guidance is for NIH entities only. Websites and digital services created by NIH grantees and externally awarded entities are not within scope of this guidance.*

The following guidance is targeted towards National Institutes of Health (NIH) Institute, Center, or Office (ICO) Records Liaisons (RLs) who assist in the management of social media and web records.

## **SOCIAL MEDIA AND WEB RECORDS**

Social Media refers to the various activities integrating web technology, social interaction, and user-generated content. Social media includes blogs, wikis, social networks, photo libraries, location-based services, and video sharing sites. Social media allows individuals to collaborate, create, organize, edit, comment on, combine and share content, likely resulting in the creation of Federal records.

The [Federal Records Act \(44 U.S.C. 3301\)](#) defines Federal records as any material that is recorded, made, or received in the course of Federal business, regardless of its form or characteristics and is worthy of preservation. Social media content that meets this definition must be managed according to the applicable laws and regulations. It is the responsibility of each NIH ICO to determine if social media records qualify as Federal records.

Questions to consider include:

- Does the content contain evidence of NIH's policies, business, or mission?
- Is this information not preserved elsewhere and only available via a social media site or website?
- Does NIH use this social media tool to convey official agency information?
- Is there a business need for this information?

If the answers to any of the questions above are yes, then the content is likely to be a Federal record. Social media and web content may be a Federal record when the use of the web technology provides added functionality, such as enhanced searchability, opportunities for substantive public comment, or other collaboration. A complete Federal record must have content, context, and structure along with associated metadata (e.g., author, date of creation, etc.) The complete record must be maintained to ensure reliability and authenticity.

## **How should NIH address the records management challenges associated with the use of Social Media?**

ICO's should establish clear internal processes that designate recordkeeping roles and responsibilities to ensure social media and web records are identified, managed, and captured. ICO staff should be encouraged to establish open communication with the ICO Records Liaison. Managing social media and web records will require coordination between the Records Liaison and colleagues within the ICO's Communications team.

### **ICO FILE PLANS**

ICO file plans within the [NIH Records Schedule System \(RSS\)](#) should account for the social media and web content that qualifies as a Federal record. The following record schedule items may cover social media and web records:

RSS Items by Category:

10 – Administrative and Management Support

- [RSS Item 505 Non-substantive Committee Records](#)

11 – Communications and Agency History

- [RSS Item 202 Public Correspondence and Communications not Requiring Formal Action](#)
- [RSS Item 204 Routine Media Relations Records](#)
- [RSS Item 205 Routine Audiovisual Records](#)

**ICO Record Liaisons should coordinate with ICO Communication Specialist to develop a plan for managing social media and web records.**

### **How do ICO's implement Social Media and Web Records capture?**

Once social media or web content is identified as Federal records and associated with an approved records schedule, ICO's must decide how to manage these records. Temporary records with transitory or short-term retention may not need to be captured and can be maintained in the social media platform. ICO's should assess their business needs and evaluate risks associated with leaving these records in social media platforms. Capture is important for temporary records with long-term retentions or for permanent records. These should be exported from the social media platform into an ICO recordkeeping system or actively managed with records management tools.

Methods to capture social media and web records include:

- Using web crawling or similar software to create local versions of sites.
- Using web capture tools to capture social media.
- Using platform-specific application programming interfaces (APIs)

to pull content.

- Using RSS Feeds, aggregators, or manual methods to capture content.
- Using tools built into some social media platforms to export content.

The options for successful social media capture will depend on the technical configuration of a social media platform. ICO business needs impact which social media capture method is used. Once the ICO determines the capture method, they must provide training to applicable staff on how and when to use capture tools for social media. ICO's may need to work with third-party providers to implement social media capture.

### **RECORDS MANAGEMENT RISKS ASSOCIATED WITH WEB RECORDS**

Managing social media and web records properly is essential to effective web-enabled operations and mitigates the risks associated with using the web to carry out NIH business.

From a records management perspective, records management risks associated with websites include:

- Challenges to the trustworthiness of the records (e.g., legal challenge) that can be expected over the life of the record.
- Unauthorized loss or destruction of records.

Consequences are measured by the degree of loss that the ICO would suffer if the trustworthiness of the website-related records could not be verified or if there were unauthorized losses or destructions.

Examples of records management-related risks associated with ICO websites are mainly technical risks. Loss of information could result from:

- An inability to document or validate transactions that occur via an ICO website front end.
- An inability to reconstruct views of web content that are created dynamically and only exist virtually for the time they are viewed.
- Compromise of e-Government transactions.
- An inability to track web-assisted policy development or document ICO decisions relating to ICO web operations.

A variety of negative programmatic consequences can result from any of these technical risks:

- Litigation or liability if an ICO is unable to verify what is on its site at a given point in time.
- Impairment of program operations or an inability to detect or punish fraud, false statements, or other illegal behavior because of

a lack of valid or probative records.

- An inability to produce records that document accountability and stewardship of materials posted to the ICO's website dissemination of misinformation.
- Financial losses due to compromising the citizens' or government's rights.
- Compromise of the NIH's mission.
- Negative reactions of NIH stakeholders.
- Unfavorable media attention.

### **HHS PROMOTED THIRD-PARTY RECORDS MANAGEMENT TOOLS**

The U.S. Department of Health and Human Services (HHS) provides all Operating Divisions (OpDivs) and Staff Divisions (StaffDivs) with guidance on managing social media and web records.

HHS provides [ArchiveSocial](#), a tool that connects directly to social media accounts to capture and preserve the content. The use of ArchiveSocial allows for the quick and easy capture of social media data and records.

Contact [engagement@hhs.gov](mailto:engagement@hhs.gov) to get access to ArchiveSocial.

Once your ICO account(s) are added to the system, you'll be able to easily sort and find social media records across multiple social media platforms. This will help your ICO streamline your social media records retention efforts. Please visit HHS's [ArchiveSocial intranet site](#) for more details on capturing and preserving social media data.

HHS promotes [Archive-It](#) as a tool for the management of web records. More information can be referenced on ArchiveSocial at [HHS intranet](#). Websites managed through Archive-It are available to view at: [NIH Archive-It Collections](#).

If using the HHS promoted tools, ICOs are assured that records are properly managed.

If ICOs do not use these tools, they should preserve unique records through web crawling. Please coordinate with NIH RMP to ensure compliance with policies and guidelines if web crawling.

Coordinate with ICO Communications Specialist to ensure social media accounts are registered with:

- NIH [odolibwebteam@nih.gov](mailto:odolibwebteam@nih.gov)
- HHS [engagement@hhs.gov](mailto:engagement@hhs.gov)
- [GSA Digital Registry](#)

### **REFERENCES:**

- [HHS Policy for Records Management](#)
- [NIH Manual Chapter 2804 Public-facing Web Management Policy](#)
- [NIH Social Media Guidelines](#)
- [OMA Guidance: Social Media and Web Management](#)
- [NARA White Paper on Best Practices for the Capture of Social Media Records](#)
- [NARA Bulletin 2014-02: Guidance on Managing Social Media Records](#)
- [NARA Bulletin 2020-01: Guidance on OMB/NARA Memorandum Transition to Electronic Records \(M-19-21\)](#)
- [Managing Web Records \(NARA\)](#)