

Ask the CRM
September 2010

Question:

How can we manage the social media phenomenon? Question asked by a client during a question and answer session at a recent seminar.

Response:

This is an excellent question concerning a real problem for those involved in the management of electronic information. A few decades ago most organizations (public and/or private) only had to worry about managing their paper records and microfilm. In a recent seminar I listed some of the different ways organizations maintain their information using today's technology:

Paper	Cell Phones
Email	Blogging
Microfilm	Optical Disks
Bar Coding	Websites
Social Networks (Wiki's, Twitter, Facebook, etc.)	Compact Disks (CD/DVD)
Cloud Computing	Flash Drives
	IM (Instant Messaging)
	Next New Technology?

Unfortunately, technology has grown faster than our ability to adequately manage new technologies effectively from a records management standpoint. One only has to subscribe to a legal, records management, archives or technology listserv to see the confusion caused by our inability to proactively provide specific guidelines on "how to" manage the information. Some regulations are being changed to include the requirements for managing social media. The Financial Industry Regulatory Authority (FINRA) issued Regulatory Notice 10-06, which requires member firms to monitor and retain business related postings made using social networks. Other federal agencies are also updating their rules to include social media content. If you note, no one is prepared for the management of the new technology, and we, in the records management profession, are always placed in a reaction mode. In the case of social media everyone is a few years behind in the establishment of the rules to manage the information explosion.

Fortunately, there is some guidance using the FAQ's (Frequently Asked Questions) on various records management websites and from NARA (National Archives & Records Administration). As of August 14, 2010 NARA has not posted guidance on their website so you should check later on their FAQ page reflected below. The following are some resources that can be reviewed in the development of a policy:

- State of Washington:
<http://www.sos.wa.gov/assets/archives/RecordsManagement/RMAdviceSheetBl ogsTwitter.pdf>
- They also have a presentation on social media that may be of interest at:
<http://www.sos.wa.gov/archives/RecordsManagement/ElectronicRecordsManagementAdviceandResources.aspx>
- City of Seattle: <http://www.seattle.gov/pan/SocialMediaPolicy.htm>
- NARA: <http://www.archives.gov/records-mgmt/faqs/>
- U.S. Government – General Service Administration:
<http://www.gsa.gov/graphics/staffoffices/socialmediapolicy.pdf>
- A listing of various social media policies by governments and private organizations can be found at the Social Media Governance website:
<http://socialmediagovernance.com/policies.php>
- University of Washington: <http://f2.washington.edu/fm/recmgt/>
- Financial Industry Regulatory Authority (FINRA):
<http://www.finra.org/Industry/Issues/Advertising/p006118>

Although a policy is not currently available on the use of social media the University of Washington website is a great resource with their records management FAQ's. If you are working in a college/university environment the website should definitely be on your favorites list.

In conclusion, while the use of social media for the dissemination of information is being rapidly adopted by government and private organizations, the legal ramifications on its use is currently in flux based on the lack of established legal precedence. The key thing to remember is that the information being created and maintained on social media sites may be considered a document and the responsibility of the user to insure that the information is retained, if a legal requirement exists.

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