



Policies and Procedures for Recording Audio and Video Meetings

A Mandatory Reference for ADS Chapters: 111, 502,
507, 508, 565, and 568

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I. OVERVIEW

This mandatory reference provides direction to members of the workforce on recording meetings while conducting USAID business. This reference provides instruction, guidance, and criteria around the appropriate use of, and minimum requirements that must be met for, recording USAID meetings/events/training/etc.

This reference applies to recording meetings involving USAID business where the content is publicly releasable, such as training for members of the public (and international community), outreach meetings open to the public or industry, and large town halls where the information discussed can be widely disseminated beyond USAID. Members of the workforce must not record meetings absent an articulated business need that requires recording of the meeting. Meetings that discuss (1) sensitive but unclassified (SBU) information, (2) classified information, or (3) internal deliberations must not be recorded. Meetings of a purely personal nature must not be recorded.

It is important for members of the workforce to understand and proactively address the many issues related to recording meetings, including:

- Privacy and security risks associated with USAID capturing and storing recorded meetings, and
- The records management and Freedom of Information Act (FOIA) responsibilities that must be met for recorded meetings.

All members of the workforce are required to follow the procedures outlined in this mandatory reference before recording.

The Meeting Host must obtain approval to record a video or audio meeting from one of the following Approving Officials in their Operating Unit (OU): Assistant Administrator, Assistant to the Administrator, Mission Director, or Washington-based Office Director (e.g., the head of a Bureau, Independent Office, or Mission [B/IO/M] or its Deputy). The Meeting Host must articulate a business need that requires recording of the meeting. The OU Approving Officials will determine if recording a video or audio meeting is warranted based on the business need justification provided by the Meeting Host and may unilaterally approve the recording for:

1. Training for members of the public (international community),
2. Outreach meetings open to the public or industry,
3. Large town halls where the information discussed can be widely disseminated, or
4. Training for members of the workforce that would be releasable in its entirety if requested under FOIA.

For other types of meetings where recording is requested, but the content of the recording is not appropriate for public disclosure, OU Approving Officials must first consult with their supporting cognizant attorney in the Office of the General Counsel (GC) or the Regional Legal Officer (RLO) to determine specific consent and notice requirements (including under local law). Once those consent and notice issues have been addressed, the OU Approving Official may authorize the recording.

B/IO/Ms should establish an internal process to implement this mandatory reference and process requests for approving the use of recorded meetings/events/trainings. In approving the recording of meetings/events, B/IO/Ms must adhere to the criteria and requirements outlined in this document.

Applicability Statement: Throughout this policy, the term "members of the workforce" refers to individuals working for or on behalf of the Agency, regardless of hiring or contracting mechanism, who have physical and/or logical access to USAID facilities and information systems. This includes U.S. Direct-Hire employees, Personal Services Contractors, Fellows, and interagency and contractor personnel. Contractors are not normally subject to Agency policy and procedures as discussed in [ADS Chapter 501](#). However, contractor personnel are included here by virtue of the applicable clauses in the contract related to Homeland Security Presidential Directive (HSPD)-12 and Information Security requirements.

II. B/IO/M Officials Authorized to Approve Recording Meetings

B/IO/M leadership are responsible for approving the recording of meetings or events. This responsibility must not be delegated to anyone below the Office Director level in B/IOs or the Executive Officer level in Missions. B/IO/M leadership must maintain and provide a list of meetings or events that have been approved to be recorded to organizations such as, the Bureau for Management, Office of Management Services, Information and Records Division (M/MS/IRD), the Office of the Chief Information Officer (M/CIO), the Office of Civil Rights (OCR), and/or the Office of Security (SEC) upon request for auditing, compliance, records management, or in support of an investigation, information request, or FOIA request.

III. Prerequisites and Criterion For Recording Meetings/Events

- 1. Consent:** Before approving a request to record meetings or trainings for members of the public (international community), outreach meetings open to the public or industry, or large town halls where the information discussed can be widely disseminated, OU leadership must ensure that consent was obtained from the presenters prior to the recording being authorized. For requests to record other types of meetings, the Meeting Host must coordinate with their supporting General Counsel or GC/RLO on whether there are additional consent requirements.
- 2. Notice of Recording:** Before approving a request to record deliberative training

for members of the public (international community), outreach meetings open to the public or industry, or large town halls where the information discussed can be widely disseminated, OU leadership must ensure that advance notice of the recording will be provided to the participants and presenters of the meeting. The meeting invite must advise participants that the meeting will be recorded and may be released publicly, describe how the OU will handle participant Personally Identifiable Information (PII), and include a reminder that PII will be handled consistent with Federal laws and USAID's Privacy and Security policies. In addition, the Meeting Host must announce at the beginning of the meeting that the meeting will be recorded. Once the recording is initiated, verbal notice that the meeting is being recorded must be provided, and a banner or dial indicating recording must be visible throughout the session. This notice can serve as consent to be recorded from participants (but not presenters) in the case of training for members of the public (international community), outreach meetings open to the public or industry, or large town halls where the information discussed can be widely disseminated.

- 3. Subject of Recorded Event:** In determining whether to approve a request to record a meeting, training, or event, OU leadership should consider whether all of the information being recorded will be publicly available and, if yes, ensure that it does not include (1) SBU information, (2) classified information, or (3) internal deliberations. If any SBU, classified, or deliberative information will be included in the recording, consultation with GC/RLO is required. OU leadership should consider whether it would be able to share the recorded event broadly with the public if, for example, it is necessary to respond to a FOIA or litigation request. OU leadership should also consider whether there is a question-and-answer portion of the event and whether it is appropriate to record that portion or end the recording before question and answer begins.
- 4. Audience:** In determining whether to approve a request to record a meeting, training, or event, OU leadership should consider who is the intended audience of the recorded event, what is the geographic location/time zone of the audience, and how the recording may facilitate information sharing with the intended audience.
- 5. Cost of Redaction and/or Transcription:** These recordings are subject to release under FOIA and through discovery in litigation. In determining whether to approve a request to record a meeting, training, or event, OU leadership should consider whether it has sufficient resources in its budget to transcribe and redact transcriptions of recordings that contain other than publicly available information. It is strongly recommended that each OU inquire on the cost of transcription and video editing on an annual basis to ensure proper annual budget allocation for recordings made that year, as well as for those previously recorded that may need transcription that year. If a FOIA request is made for the training/event/meeting, the OU hosting the recording will be responsible for following [ADS Chapter 507, Freedom of Information Act](#) procedures,

reviewing the video, assessing whether the video may be released in its entirety or whether the video needs to be released in part, and assessing whether transcription is necessary before release. If redactions are needed, the OU is responsible for providing all resources to pay for all video-redaction services and transcription of the training/event/meeting. This may include identifying the OU's funding and the OU getting a contract if the capability does not reside internally. The OU is also advised to maintain a log of all recorded meetings with summaries of their content to assist with FOIA compliance and better estimate future budgets.

6. **Purpose and Intended Use of the Recorded Event:** In determining whether to approve a request to record a meeting, training, or event, OU leadership should consider the purpose of the recording to understand why the event is being recorded. OU leadership should inquire as to the intended use and distribution plan of the recording. OU leadership should also consider whether the participants and presenters were made sufficiently aware of the purpose and intended use of the recording. OU leadership should consider whether the recorded event furthers the Agency's mission.
7. **Privacy/PII:** In determining whether to approve a request to record a meeting, training, or event, OU leadership should assess whether any PII is being discussed or shared at the meeting and for what purpose. OU leadership must consider whether recording is appropriate if any PII is being discussed or shared and are strongly encouraged not to record these conversations without a significant overarching business need. Does everyone attending the recorded event have a need-to-know the information being shared? Does the OU have sufficient resources to redact the PII from the video recording in the event of a FOIA or discovery request in litigation?

IV. Recording Meeting Procedures

1. Agency Officials/Meeting Hosts may leverage event organizers to assist in setting up the meetings or managing logistics around meetings or events. The Agency Official that is the Meeting Host is the content owner and is responsible for managing the recordings. If the recording is sent to the event organizer automatically, the event organizer must forward the recording to the Agency Official/Meeting Host for management.
2. OUs will ensure that Meeting Hosts clearly communicate and announce their intent to record the meeting (e.g., explain in the meeting invitation that the meeting may be recorded, announce it at the beginning of the meeting, and at the end of the meeting, etc.). Meeting Hosts will ensure adequate consent and notice of the recording.
 - Presenters must provide consent to be recorded in the following: (1) training for members of the public (international community), (2) outreach

meetings open to the public or industry, or (3) large town halls where the information discussed can be widely disseminated prior to granting approval for recording.

- The Meeting Host must include a notification that the meeting is being recorded in the meeting invite. The Meeting Host must announce that the meeting is being recorded at the beginning (before starting a recording and immediately after starting the recording). Notice that a meeting is being recorded must be displayed throughout the meeting to provide awareness to participants who miss the initial recording announcement because they join a meeting already in progress (this notification is standard on Agency-approved web-conferencing systems).
3. OUs will not record or disseminate recordings with classified or sensitive material without prior written approval from the Office of Security.
 4. OUs will comply with USAID Records Management requirements as outlined in [ADS Chapter 502](#). This includes storing and preserving all recordings in accordance with USAID records management and M/CIO policies and standards.
 5. OUs understand that recordings can be official government records and are subject to the provisions set forth in [ADS Chapter 507](#). OUs must be prepared to produce/submit recordings requested under the FOIA or through discovery in litigation and assume responsibility and costs for:
 - Reviewing submitted recordings for FOIA exemptions and other redactions, if necessary;
 - Editing recordings to remove/mark applicable FOIA exemptions and redactions; and
 - Paying for the transcription of recordings.

V. Procedures for Participating in or Conducting a Virtual Meeting in Restricted Space

Members of the workforce who work within restricted USAID workspaces must follow the below instructions when participating in a virtual meeting that is being recorded:

1. The member of workforce must move to an unrestricted workspace to participate in the virtual meeting; or
2. If the workforce member is unable to move to an unrestricted area and will remain in a restricted workspace, they must ensure both audio (microphone) and video (camera) are turned off and must dial in using their desktop phone to participate in the meeting. The user must also:

- a. Notify employees in or around their workspace that they are attending an unclassified virtual meeting and to not discuss any classified information as it may be overheard and recorded.
 - b. Upon completion, the workforce member must notify surrounding employees that the unclassified meeting has concluded.
3. Options to dial into a meeting:
 - a. Members of the workforce can dial the number and access code associated with the particular meeting.
 - b. Members of the workforce can click on the “Join and Use a Phone for Audio” link.

See [ADS Chapter 565, Domestic Security Programs](#) and [ADS Chapter 568, National Security Information Program](#) for more information relating to restricted workspaces. See [ADS 552, Cyber Security for National Security Information \(NSI\) Systems](#) and [ADS 568](#) for classified spills policy.

VI. Polls and Surveys in a Recorded Meeting

The discussion and conversation at a public meeting is exempt from Paperwork Reduction Act clearance, and many online or interactive communications fall under this exemption. Interactive meeting tools like public conference calls, webinars, discussions board and forums, and chat sessions are considered the electronic equivalent of in-person public meetings and do not need clearance.

If, however, a Meeting Host issues surveys of any kind, including web polls and satisfaction surveys that pose identical, specific questions (including through pop-up windows), the Paperwork Reduction Act does apply (see **Section VIII. Additional Considerations**, number 4 (Paperwork Reduction Act), below).

For more information, also see: https://www.whitehouse.gov/wp-content/uploads/legacy_drupal_files/omb/assets/inforeg/SocialMediaGuidance_04072010.pdf.

VII. Reasonable Accommodation

Creating an audio/video recording or transcript for an individual (employee or applicant) who requires services due to a disability follows a different process than outlined in this mandatory reference. USAID is committed to supporting and accommodating individuals with disabilities consistent with the law and USAID policies. The Agency will follow its reasonable accommodation process to fulfill these needs on a case-by-case

basis (see [ADS Chapter 111, Providing Reasonable Accommodations to Individuals with Disabilities](#)). The requestor should contact OCR at reasonableaccommodations@usaid.gov.

VIII. Additional Considerations

Meetings other than training for members of the public (international community), outreach meetings open to the public or industry, or large town halls where the information discussed can be widely disseminated require additional considerations. Supporting General Counsel and GC/RLOs must be consulted in these cases prior to authorizing the recording. The following items are intended to provide a partial list of issues that can arise from recording meetings.

1. SBU, Internal Deliberations, and Classified Information

Generally, recording is not appropriate when the meeting discusses SBU information, internal deliberations, or classified information. SBU must not be discussed in any public forum or recorded in a meeting that is intended to be shared with the public. Please see [ADS 545mbd, Rules of Behavior for Users](#) to better understand the rules and requirements that govern the appropriate use and protection of Agency information and information resources.

Requests to record meetings involving these topics must receive elevated review by the corresponding GC/RLO backstop, M/CIO's Information Assurance Division (M/CIO/IA)/Privacy, and M/MS/IRD. OU Approving Officials must have sufficient resources within the OU to handle review, redaction, and transcription to respond to information requests for videos that contain SBU or internal deliberations.

2. Additional Concerns for Classified Information

Members of the workforce must not discuss classified information during virtual meetings on their unclassified computers, unclassified mobile devices, and in unclassified spaces (including their homes). Members of the workforce must not record virtual meetings that will discuss or review information that is classified. A classified discussion must not be held in an unsecure location (e.g., unrestricted workspace, at home, etc.) or take place on an unsecure computer/connection (e.g., AidNet, Google meets, Bluejeans, Government Furnished Equipment [GFE] phone, etc.); all classified meetings must be held on ClassNet-approved devices for up to the Secret level and Crisis Management System (CMS) or Joint Worldwide Information Communications Systems (JWICS) devices for up to the Top Secret (TS) and Sensitive Compartmented Information (SCI) levels. Virtual meetings in which participants may discuss classified information must not be recorded. Violation of these requirements may be considered a security incident and must be reported to SEC for review.

3. Privacy Implications Related to Collecting and Storing Recorded Meetings

Applications used to collect and store meeting recordings collect participants' email addresses; names; phone numbers; video images; voice recordings and profile photos, if provided; chat content generated during the meeting; and other PII, such as Internet Protocol (IP) addresses and other PII elements. The notice and consent requirements as privacy mitigations identified above would apply.

The Meeting Host must consider how recorded meetings will be stored and/or retrieved. For example, are recordings retrievable by host names or individual meeting participant names? If the answer to either of these questions is yes, USAID must follow Privacy Act rules and procedures, such as publishing a System of Records Notice (SORN) before recorded meetings can be collected and stored by USAID.

Please contact the USAID Privacy Program at privacy@usaid.gov for additional guidance on privacy-related requirements, such as publication of SORNs. Contact M/MMS/IRD for additional guidance on information collection request (ICR)-related requirements. The notice and consent requirements as privacy mitigations identified above would apply.

4. Paperwork Reduction Act (PRA)

The PRA governs how Federal agencies collect information from the “public,” which can include contract staff. Meeting Hosts should consult M/MMS/IRD and GC/RLO regarding the conduct of polls or surveys during meetings/events from ten or more people/groups that are not classified as U.S. Direct-Hires. Polls or surveys, etc., could be considered an ICR, which is regulated under the PRA, depending on fact specific circumstances. Whether your collection is voluntary or mandatory, the PRA treats the collection the same.

For more information on the ICR approval process, see [ADS 508](#), [ADS 508maa](#), [ADS 505](#), and [ADS 506](#) to ensure compliance with the PRA.

5. Records Management

The [Federal Records Act](#) requires each agency to make and preserve records containing adequate and proper documentation of the organization, functions, policies, decisions, procedures, and essential transactions of the agency.

Audio/visual recordings of meetings/events are considered a record and must be kept in compliance with USAID's records-management policy. The Meeting Host is responsible for identifying an appropriate disposition authority and preserving the recording throughout its retention requirements (see [ADS 502mac](#), [USAID's Records Disposition Schedules](#)). The retention requirements will vary depending on the purpose, content, and context of the meeting. Some recordings will have a permanent retention and need to be transferred to the National Archives and Records Administration (NARA), while others will have a temporary retention and eventually be destroyed. If you have questions or need assistance, please email

recordsinquiry@usaid.gov.

6. Disciplinary and Contract Enforcement Action

Members of the workforce who fail to abide by this policy, including but not limited to recording official USAID business without the required permission and notice, will be referred to the Office of Human Capital and Talent Management, Employee Labor Relations (HCTM/ELR) (for U.S. Direct-Hire staff) and the Bureau for Management, Office of Acquisition and Assistance (M/OAA) or their Contracting Officer (for contract staff) for appropriate corrective action.

IX. GLOSSARY

Classified National Security Information

Information that has been determined pursuant to E.O. 13526 or any predecessor order to require protection against unauthorized disclosure and is marked (confidential, secret, or top secret) to indicate its classified status when in documentary form.

Deliberative Information

Privileged information covering pre-decisional communications that are intra- or interagency.

Meeting Host

The person who scheduled the meeting. The host has control over all functions and features in the meeting. If the virtual meeting is being recorded, the Meeting Host must notify meeting attendees that the meeting is being recorded. The meeting host is responsible for managing the meeting recording.

Personally Identifiable Information (PII) (Per [OMB A-130](#))

Information that can be used to distinguish or trace an individual's identity, either alone or when combined with other information that is linked or linkable to a specific individual. The definition of PII is not anchored to any single category of information or technology. Rather, it requires a case-by-case assessment of the specific risk that an individual could be identified. In performing this assessment, it is important for an agency to recognize that non-PII can become PII whenever additional information is made publicly available—in any medium and from any source—that, when combined with other available information, could be used to identify an individual.

Records

Documentary materials, regardless of physical form or characteristics, that are made or received in connection with the transaction of the Agency's business.

Restricted Space

An area where storage, processing, discussions, and handling of classified material may occur.

Unrestricted Space

An area where storage, processing, discussing, and handling of classified material are not authorized. Classified meetings or conversations are not authorized in designated unrestricted areas.

Workforce

All individuals working for or on behalf of the Agency, regardless of hiring or contracting mechanism, who have physical and/or logical access to USAID facilities and information systems. This includes, but is not limited to, U.S. Direct-Hire employees, Personal Services Contractors, Fellows, Interagency personnel, and contract personnel. (Note: Contractors are not normally subject to Agency policy and procedures as discussed in ADS 501.1. However, contract personnel are included here by virtue of the applicable clauses in the contract related to HSPD-12 and information security requirements.)

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