



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
THE ADMINISTRATOR

MEMORANDUM

SUBJECT: New epaosc.org governance in effect starting January 1, 2017

FROM: Mathy Stanislaus
Assistant Administrator
Office of Land and Emergency Management

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Ann Dunkin
Chief Information Officer
Office of Environmental Information

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Frank Benenati
Associate Administrator
Office of Public Affairs

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TO: Regional Administrators
Deputy Regional Administrators
Regional Superfund Division Directors
Regional Public Affairs Directors

The epaosc.org website was established in 2001 and has since developed into an invaluable and nimble tool for EPA's emergency response community to capture critical information from a response and share it with stakeholders. The website domain's critical function in supporting the EPA response program must be maintained. However, recent events have highlighted some challenges that the Agency faces in managing the content shared with the public through epaosc.org. Specifically, the Gold King Mine After-Action Report recommended that the governance for epaosc.org be examined and that new user guidelines be developed.

In response, our offices have been working with the Gold King Mine After-Action Report implementation team and the Environmental Response Team to develop the attached governance for epaosc.org. The new governance is effective January 1, 2017 and will be applied to all new response-specific pages created within the epaosc.org domain moving forward. In addition, any existing regional guidance related to sharing information with stakeholders and the public through websites should be updated, as necessary, to comply with the new epaosc.org governance. If such guidance does not exist, Regions should consider creating Standard

Operating Procedures or other internal guidance to ensure that the collaboration envisioned in the governance document occurs in an effective and efficient manner.

The new epaossc.org governance document is critical to maintaining EPA's ability to respond to our stakeholders and the public in an appropriate and timely manner in the age of constant news coverage. We want to emphasize the expectation that staff in Superfund, Emergency Response and Removal, and Public Affairs programs develop strong working relationships with each other, especially in the regions. By working as a team, we can ensure that EPA shares appropriate information with the public and other stakeholders in a timely fashion for every emergency response and removal action. The new epaossc.org governance is designed to reinforce and support that collaboration, while maintaining the flexibility of the epaossc.org tool.

In addition, within 6 months, OEI and OLEM will work together to develop a plan for transitioning the epaossc.org domain to epa.gov. The final domain migration is expected to occur on or before January 1st, 2018. This transition to epa.gov will:

- Provide the public with an Agency-wide content search capability;
- Assure that EPA information is clear, consistent and approved for dissemination;
- Aid in meeting Agency records management, analytics, and security requirements; and
- Protect the integrity and quality of EPA information.

After much research, consideration, and feedback from you, we believe that this new governance will only strengthen EPA's emergency response, removal, and crisis communications functions.

Thank you in advance for your efforts to implement the new epaossc.org governance quickly and smoothly.

Attachment

CC:

Matt Fritz, Chief of Staff, Office of the Administrator
George Hull, Acting Principal Deputy Associate Administrator, Office of Public Affairs
Nancy Grantham, Office of Public Affairs
Jim Woolford, Director, Office of Superfund Remediation and Technology Innovation
Reggie Cheatham, Director, Office of Emergency Management

Epaosc.org Governance: Use and Publication Guidelines

Background

In 2001 the EPA started using a non-government domain (epaosc.org) for On-Scene Coordinators (OSCs) to access, track and share information. Epaosc.org is also used by EPA's incident response community to create response specific webpages to share operational and other critical information about the Agency's work with internal and external response partners. Each year, EPA's incident response community creates hundreds of webpages on the epaosc.org domain for incidents ranging from small spills to nationally-significant events.

Historically, there have been inconsistencies across EPA within the public affairs community as to the level of involvement with managing of the public content on epaosc.org. Effective emergency response requires teamwork and communication. Recent events have emphasized the critical need for the emergency response community (e.g., the On Scene Coordinators (OSC)) and the public affairs community (e.g., Public Affairs Directors (PADs)) to work as a team in order to meet the agency's mission to provide accurate and timely information to the public.

Government agencies are directed to use government domains (.gov) to communicate with the public. Federal restrictions and White House Memoranda limit the use of non-government (.org, .net) domains to share information with the public. In September 2015, the EPA's Office of Land and Emergency Management (formerly OSWER) requested and obtained a waiver from the Office of Environmental Information (OEI) to operate the non-government domain epaosc.org.

Based on this approval, EPA has established these governance guidelines to allow the use of the epaosc.org domain and its webpages to provide information to the public and has established steps for the seamless transition between information on epaosc.org and EPA's government domain (www.epa.gov) and vice-versa.

These guidelines are intended to be used for all response webpages created on the epaosc.org domain and are applicable to all new content and webpages beginning in January 2017 and moving forward. All previously created webpages and content will remain unchanged.

In addition, within 6 months, OEI and OLEM will work together to develop a plan for transitioning the epaosc.org domain to epa.gov. The final domain migration is expected to occur on or before January 1st, 2018. This transition to epa.gov will:

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- Protect the integrity and quality of EPA information.

Principles

- Maintain the epaosc.org domain's critical function in supporting the EPA response program to access, track, and share information.
- Support the OSC/PAD mutual responsibility to share information with the public.
- Improve efficiency and effectiveness for sharing information with the public.
- Seamlessly integrate epaosc.org domain with EPA's online publication requirements.
- Improve coordination between EPA's response program, community involvement activities and the public affairs program.
- Enhance internal situational awareness and improve strategic communication planning.
- Support incident command and/or unified command goals and objectives.
- Safeguard against the public release of protected information.

Roles

The OSCs, PADs, and their respective managements coordinate on message development and communication during an incident response and post information in a timely manner, ensuring it is accurate, has appropriate context, reaches the intended audience, and is understandable by that audience. The removal program and public affairs should maintain a constant dialogue to ensure a team approach for public communications before, during, and after an emergency response.

In each region, the Removal Manager (RM) will work with the PAD to ensure that designated communications staff (e.g., PAD or designee) have publishing rights for the region's public domain on epaosc.org. In addition, the PAD will coordinate with the RM and the Environmental Response Team in Edison, New Jersey (responsible for the operation of epaosc.org) to determine the frequency of web analytic reports for the region's public domain on epaosc.org.

Nothing in this document should undermine the management entities for OSCs or PADs in providing direction to, changing the strategy of, reconciling the differences between, or otherwise managing the OSC and PAD (including community involvement staff) involved in any particular incident or response. In fact, the managers in both the emergency response and public affairs programs, both in the regions and at Headquarters, play a critical role in establishing and maintaining the teamwork approach emphasized here between EPA's emergency response and public affairs communities.

Use of epaosc.org

Epaosc.org was created to facilitate OSCs ability to access, track, and share information.

When

The OSC creates a webpage on epaosc.org for each response action (i.e., emergency response or removal site) where the agency has deployed resources.

How

The OSC and PAD collaborate on the publication of a **public facing webpage** on epaosc.org and follow specified Agency rules and procedures. Community Involvement Coordinators (CIC) provide a valuable resource for sharing information with the public during response activities and will be a part of the team that develops content for public facing webpages on epaosc.org.

Access Levels

The domain allows those with administrative rights (e.g., OSCs) to create webpages and control access to posted information. Information access levels for users include public, password protected (private), and exclusive.

Public Access

The public access content is available to anyone who can access the site, including the press. Content posted publicly may waive any applicable privileges that EPA might otherwise have available.

Audience/Accessibility

The audience for the publicly available content on epaosc.org is the general public, press, Congressional and other elected officials, and all other stakeholders. Public access is the only level of access for the press.

What could be posted on the public side of epaosc.org

- Site profile information
- Videos (unless they contain Personally Identifiable Information (PII) or Confidential Business Information (CBI))
- Maps
- Photographs (unless they contain PII or CBI)
- Audience appropriate incident-related operational information, such as fact sheets, frequently asked questions, other documents generated for the community, and press releases
- Data summaries, charts, and graphs
- Notices section can be used for site updates
- Contacts on the public facing web pages should be limited to OSC, PAD, and/or CIC only

What not to post on the public side of epaosc.org

The following documents should not be posted with public access on epaosc.org for any reason:

- PolReps and SitReps and other Internal planning and operational documents
- Enforcement related orders, letters, or compliance history summaries
- Documents containing non-redacted Personally Identifiable Information (PII), Confidential Business Information (CBI), information subject to the Privacy Act (unless permitted by the systems of records notice or a Privacy Act exemption), or privileged information that is not appropriate for public release
- Criminal Investigation Division information
- Certain cost related documents such as those containing support contractor labor rates, estimated costs, and other sensitive cost information
- Draft documents
- Anything not intended for the public

Coordinating postings for the public on epaosc.org

Developing content for a public facing webpage on epaosc.org for a response action (i.e., emergency response or removal site) is done collaboratively by the OSC and the PAD, with input from CICs, and follows regional coordination protocols for the OSC and PAD. The PAD can assist the OSC by 1) crafting an effective message to the public about complex emergency response work and 2) determining what information is appropriate and not appropriate to provide to the public.

Password Protected/Private Access

Epaosc.org is also used to manage the tactical aspects of the response through the private access content on the site. The private access level is the default for all incident response pages, and documents posted to epaosc.org must be modified from the default private setting by the OSC when posting to change the viewing access. The private access feature allows those with an epa.gov email address to access private content as well as anyone who has been given access rights to specific site pages. A password is needed to access the password protected content of the site. This access level has historically, and should continue to be, the level of access that EPA's OSCs use to share information with other emergency response partners. As a result, it is possible for the same incident response to have two types of content on epaosc.org: public access content (for the community and press) and private access content (for EPA and emergency response partners), including exclusive access to specific documents.

Audience/Accessibility

Access to the password controlled content on the site (i.e., private) is restricted to EPA employees and site-specific response partners only. Passwords are not to be shared with members of the general public, reporters, or any other external stakeholders. This would violate the site's terms and conditions. Even though the content is private, the same discretion should be used in posting private content as is given to emailing materials to stakeholders.

What could be posted on private side of epaosc.org

- PolReps and SitReps and other operational documents
- Internal cost information (subject to CBI limitations for each regulation)
- Staffing and project planning documents
- Maps, graphs, photos, etc. (unless they contain PII or CBI)
- Data

What not to post on private side of epaosc.org

- Draft documents
- Documents intended to be viewed by a very limited number of individuals
- Enforcement sensitive information
- Actual or potential CBI
- Classified information

Exclusive Access

The exclusive access level is generally limited to those with modify rights to the site and specific users who need access to draft and sensitive documents, including state response partners. This level of access is typically only used for sharing draft documents and sensitive non-classified documents with other EPA emergency personnel.

Use of webpages on epa.gov

During significant events, EPA often creates an incident response webpage on epa.gov, the EPA's government domain, to share information with the public. Information shared on epa.gov follows specified Agency rules and procedures.

When

When an incident is significant, the OSC and PAD, in coordination with EPA's Office of Public Affairs, should strongly consider creating a webpage on epa.gov to share information with the public, rather than using epaosc.org.

Significant incidents could include but are not limited to:

- Involving injuries or death
- Involving evacuations, quarantine, or shelter-in-place of the public
- Involving potential terrorism
- Involving major releases/discharges (per NCP)
- Involving high media or political attention
- Involving threats or impacts to sensitive environments

How

The PAD approves publication of a webpage(s) on epa.gov that follows specified Agency rules and procedures. The PAD and OSC should develop incident specific procedures to review and post information on the webpage(s), including plans to sustain the webpage(s) in order to meet the public communication needs for the duration of the response. In some cases, EPA's Office of Public Affairs may manage the Agency's public epa.gov webpages during an incident.

Transitioning between domains

Every effort will be made to make the transition of information seamless to the public. When transitioning the public communications for a response between EPA domains, all necessary steps need to be taken to preserve all content during and after the transition, while at the same time continuing to provide timely and accurate information to the public. Both domains should provide information about the current location of updated and ongoing published content. When an incident concludes, a final update on the status of the response should be posted to both domains.

Epaosc.org to epa.gov

If the decision is made to shift the public communications from public access content on epaosc.org to epa.gov, the public content on the epaosc.org domain should remain unaltered and publicly accessible. The first line of the website information on epaosc.org should direct visitors to the website on the epa.gov domain.

Epa.gov to epaosc.org

As interest in the response evolves, the PAD and OSC may decide that it is more appropriate to the level of the response to return public communications to epaosc.org. If the decision is made to shift the public communications from epa.gov back to epaosc.org, the content of the epa.gov should remain unaltered, easily accessible to the public, and a notice posted that future updates can be found on the epaosc.org site.

FOIA

Documents posted on the private side of epaosc.org may be subject to the Freedom of Information Act (FOIA). The Agency will have to review these records on a document-by-document basis if there is a FOIA request. Although exemptions may apply it is recommended that any documents containing non-redacted, confidential, or privileged information not be posted on epaosc.org.

Dated: 12/28/16