

MAYOR JIM GRAY



LEXINGTON

BRUCE SAHLI
DIRECTOR
OFFICE OF INTERNAL AUDIT

INTERNAL AUDIT REPORT

DATE: May 25, 2016

TO: Jim Gray, Mayor

CC: Sally Hamilton, Chief Administrative Officer
Glenn Brown, Deputy Chief Administrative Officer
Aldona Valicenti, Chief Information Officer
Phyllis Cooper, Director of Accounting
Susan Straub, Communications Director
Stacey Dimon, Information Office Supervisor
Urban County Council
Internal Audit Board

FROM: Bruce Sahli, CIA, CFE, Director of Internal Audit
Jim Quinn, CIA, CISA, Internal Auditor

RE: Social Media Controls Audit

Background

Social media, or social networking, is defined as a form of electronic communication through which users create online communities to share information, ideas, personal messages, and other content. There are a number of popular social media websites and platforms including Facebook, Twitter, YouTube, Flickr, Instagram and Snap Chat. Social media has become popular not only among individuals, but increasingly among businesses and state and local governments. It provides governments a new way to communicate and engage with a different audience of citizens on a two-way,



real-time basis and to provide information on such things as government services and upcoming activities and events. The Chief Information Officer expects social media to replace email as the dominant technology by which the LFUCG and citizens will communicate with one another.

LFUCG's experience with social media and the establishment of its social media accounts had been piecemeal and mostly initiated by individual employees, Departments, Divisions, and programs as they saw the need and realized how this type of communication could enhance the services they provide to citizens. Most accounts were established without any official authority, sanction, or approval from LFUCG's senior management, and for the most part operated independently and autonomously.

Recognizing the lack of oversight and control over these accounts as a possible risk to the city, CAO Policy #50 Social Media Policy was issued by the Office of the CAO on November 18, 2014. CAO Policy #50 "establishes a process for establishing and maintaining social media accounts to protect LFUCG divisions and personnel". This policy provides specific procedures to be followed and forms to be completed by LFUCG employees and Departments/Divisions to establish new social media accounts, to authorize social media account representatives, and to provide guidelines and best practices for the administration of these accounts. The policy also establishes authority for the approval, maintenance, and monitoring of these accounts with the Office of the CAO, the Office of the CIO, the Mayor's Director of Communications, and the Division of Government Communications. Under CAO Policy #50, no new government social media account should be established without following this policy's provisions. The policy also establishes a customer use policy regarding user comments posted on social media sites and gives the CAO and CIO authority to disable any account that is in violation of the policy, and to remove any social media representative from an account at any time. A copy of CAO Policy #50 is provided in Appendix B.

LFUCG presently has multiple social media accounts on a variety of different social media websites. A listing of these accounts (taken from the social media directory on LFUCG's homepage, lexingtonky.gov) is provided in Appendix A.



Scope and Objectives

The general control objectives for the audit were to determine that:

- Existing social media accounts are in compliance with CAO Policy #50
- Social media accounts are adequately monitored and controlled
- Tracking metrics are in use to determine whether social media accounts are achieving their goals
- Policies and procedures used for social media accounts are in line with CAO Policy #50 and practices established by other local governments and with general best practices

CAO Policy #50 is the existing LFUCG-wide standard by which the management and oversight of LFUCG social media can now be measured. Therefore, a substantial focus of this audit was the examination of the various Department and Division social media sites for compliance with this policy.

The scope of the audit covered the period November 18, 2014 through November 20, 2015. As previously noted, November 18, 2014 was the date CAO Policy #50 was issued.

Statement of Auditing Standards

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing. Those standards require that we plan and perform the audit to afford a reasonable basis for our judgments and conclusions regarding the organization, program, activity or function under audit. An audit also includes assessments of applicable internal controls and compliance with requirements of laws and regulations when necessary to satisfy the audit objectives. We believe that our audit provides a reasonable basis for our conclusions.

Audit Opinion

In our opinion, the controls and procedures did not provide reasonable assurance that the general control objectives were being met. Opportunities to improve controls are included in the Summary of Audit Findings.



Priority Rating Process

To assist management in its evaluation, the findings have been assigned a qualitative assessment of the need for corrective action. Each item is assessed a high, moderate, or low priority as follows:

High - Represents a finding requiring immediate action by management to mitigate risks and/or costs associated with the process being audited.

Moderate – Represents a finding requiring timely action by management to mitigate risks and/or costs associated with the process being audited.

Low - Represents a finding for consideration by management for correction or implementation associated with the process being audited.

SUMMARY OF AUDIT FINDINGS

Finding #1: Missing or Incomplete Social Media Documentation

Priority Rating: High

Condition:

We found that some LFUCG Divisions and Departments with social media accounts had not provided any social media account request and account authorization forms to the Division of Government Communications as required under CAO Policy #50. We also noted that many of the social media account request and account authorization forms that were provided to Government Communications were incomplete and lacked required authorizing signatures, including signatures of Division Directors, Commissioners, the CAO, and the CIO.

Division of Government Communications personnel explained that upon the implementation of CAO Policy #50 and the initial request for account documentation from those Divisions and Departments with existing social media accounts, they were most concerned with obtaining account usernames and passwords so they could have access to these accounts if needed. Government Communications has recently begun the process of reissuing these forms and requesting they be fully completed with all required authorizing signatures and with improved passwords.



Effect:

Without complete account information and authorizing signatures for all existing LFUCG social media accounts, the Division of Government Communications cannot adequately administer, control, and monitor these accounts. They also cannot ensure employee accountability and assign management responsibility should there be any violation of CAO Policy #50.

Recommendation:

We recommend Government Communications obtain fully completed and updated Social Media Account Request Forms and Social Media Account Authorization Forms from all Divisions and Departments with active social media accounts as required by CAO Policy #50.

CAO Response:

All documentation has been completed with necessary signatures.

Finding #2: Links to LFUCG Main Website and Customer Use Policy Consistently Needed on Social Media Account Pages

Priority Rating: High

Condition:

CAO Policy #50 states under Section IV, part C (entitled “Best Practices”) that “LFUCG social media accounts should be clearly branded as an official government presence and shall link back to the appropriate lexingtonky.gov website.” The policy also states that these accounts should link to the city’s Customer Use Policy which provides a list of types of user comments which may be considered inappropriate and may subsequently be removed from LFUCG social media sites. During our review of these accounts, we found that 7 of 23 (30.4%) accounts tested did not provide links to LFUCG’s main website (lexingtonky.gov), and 8 of 14 (57.1%) accounts tested did not provide a link to the LFUCG Customer Use Policy.

Effect:

Without links to LFUCG’s main website on these social media pages, the government is losing an opportunity to drive traffic (citizens) to its homepage and therefore is not efficiently and effectively promoting, managing, and optimizing its “brand” or taking full advantage of presenting its services to the public. LFUCG may also expose itself



to criticism if comments posted by citizens are removed without first providing full disclosure or disclaimer of the potential reasons why comments may be removed. The Customer Use Policy also provides a good outline of the purpose of the social media pages and the type of discussion and engagement with citizens they are meant to achieve and provide.

Recommendation:

Government Communications should require Divisions and Departments with social media accounts to provide links to the LFUCG homepage and the social media Customer Use Policy as recommended by CAO Policy #50.

CAO Response:

All social media accounts currently link to the main website or an appropriate web page.

Finding #3: Excessive Number of Social Media Administrators Noted For Some Accounts

Priority Rating: High

Condition:

Some Divisions and Departments with social media accounts appear to have an excessive number of social media administrators. Social media administrators are LFUCG employees charged with managing and maintaining the social media accounts within their Division/Department. The administrators are given the account username and password and full access to perform operations on the account. Best practice for social media accounts is to have one or two administrators, with one employee to serve as the main administrator and possibly another employee to serve as backup. We found some LFUCG social media accounts with eight to eleven administrators for a single account.

Effect:

While having this many account administrators may be more convenient operationally for a Department or Division, there is an increased risk of inadequate account control and account security resulting from this many employees having full administrative rights and privileges. Furthermore, the ability to provide a consistent and uniform message could be hindered with so many administrators potentially involved in providing social media content for a given Department or Division.



Recommendation:

We recommend Government Communications instruct Departments and Divisions with social media accounts to limit the number of social media administrators for each account to the recommended best practice number of one or two administrators per account.

CAO Response:

The number of social media administrators will vary according to the site. Some divisions do need more than two. Larger divisions like Fire & Emergency Services have staff that are working different shifts or are out on “runs” so it is more effective to have more than two people managing the account to better disseminate information.

It would be more appropriate for divisions to have their own procedures regarding “roles” of staff to ensure someone is always monitoring/posting to social media. Example, John Smith is the person primarily responsible for handling the social media for the Family Care Center. Jane Doe is the second back-up and fills in as necessary. Sue Johnson is third, etc.

The Office of Public Information will work with divisions to help them determine the most appropriate amount of account users.

Finding #4: Social Media Account Forms Not Retained as Required by CAO Policy #50

Priority Rating: High

Condition:

According to CAO Policy #50, Section IV, parts A and B, (entitled “Approval of Social Media Accounts” and “Administration of Social Media Accounts”), copies of the social media request and authorization forms shall be retained by the Division of Government Communications, the Division of Computer Services, and the Mayor’s Director of Communications”. We noted copies of these forms had been retained by the Division of Government Communications and the Mayor’s Director of Communications, but no copies were sent to and retained by the Division of Computer Services as required in the policy.



Effect:

Social media accounts in general are subject to increased security risk for hacking, phishing attacks, malware and viruses. If these accounts are hacked or hijacked, control of these accounts would be compromised. If the Division of Computer Services does not have all account information contained in the social media request and authorization forms, LFUCG's overall ability to respond to such an incident in a timely and effective manner could be impacted.

Recommendation:

Copies of all completed social media account request and authorization forms should be provided to the Division of Computer Services by Government Communications as required by CAO Policy #50. The Division of Computer Services should logically play a role in the maintenance and management of social media accounts, including providing assistance in responding to any potentially critical security incidents which may occur on these sites.

CAO Response:

Many accounts, including the Mayor's Office, Government Communications and Environmental Policy are set up through an employee's personal Facebook page. A page has been created for those accounts and multiple employees have been made managers of the pages.

The Department of Law approved this practice. They understood that people would not want to give out personal information so they approved the practice of naming additional managers on the page.

Due to social media being handled through third party vendors, Computer Services would have no role if an issue were to occur. Any issues would be handled by information officers. With copies of accounts, user names and passwords in both the Office of Public Information and the Mayor's Office, there is adequate staff that would be available to handle a situation, should one arise. CAO Policy #50 will be rewritten to strike the language requiring Computer Services to have password access.



Finding #5: Social Media Account Password Protection Should be Strengthened

Priority Rating: High

Condition:

We noted that most LFUCG social media accounts lacked complex passwords, and some had simple passwords. We also noted that social media administrators are not required to change their passwords on an intermittent basis, and some areas used the same password across multiple types of social media accounts and platforms. CAO Policy #50 does not address the strength or complexity of passwords to be used for social media accounts. The only references the Policy makes in regard to account security and computer use is that social media users shall not share login information or passwords for these accounts, and states that as part of the Policy they will comply with CAO Policy #25 regarding computer use (which provides no specific guidelines regarding password complexity).

Government Communications has indicated they have begun the process of reissuing all social media forms to all Departments and Divisions concerned and, as part of this process, are requiring all social media accounts have more complex, stronger passwords. The Mayor's Director of Communications Office and the Division of Government Communications currently maintain hard copies of login/password information in a secured location.

Effect:

As stated in Finding #4, social media accounts in general are subject to increased security risk for hacking, phishing attacks, malware and viruses. This risk is increased if the passwords to access these accounts are not sufficiently complex.

Recommendation:

In order to adequately protect social media accounts and to reduce the risk of reputational damage to LFUCG through hijacked social media accounts, we recommend enhanced password complexity for all social media accounts. Password best practices indicate that passwords should:

- Be a minimum of 9 characters in length
- Not contain your last name, username, common words or numbers in sequence
- Be changed every 90 days
- Be unique (don't reuse a password)
- Have at least one character from 3 of these categories:



1. Upper Case Characters (A thru Z)
2. Lower Case Characters (a thru z)
3. Base 10 digits (0 thru 9)
4. Non-alphanumeric characters ~!@#\$%^&*_+=;,"<>,.

We also recommend that social media account passwords should be changed on a regular basis, according to password and computer security best practices. Login/password information should be retained in a secured electronic file rather than on hard copy documents to decrease the risk of exposure to unauthorized personnel.

In addition, many social media websites and platforms have inherent security features which, when turned on or opted for by the administrator of the account, can substantially increase the account's security. One of these features is two-factor or two-step account authentication. Along with a login/username, two-step account authentication would require an additional component be provided to access the account. In many cases, the additional component can take the form of something the user physically possesses, such as a token, bankcard, or mobile phone. In the case of a mobile phone, a text message can be sent (by the social media website) to the user's phone with a unique number passcode to access the account. The premise behind this feature is that an unauthorized "actor" is unlikely to be able to supply both components required for authentication. The use of such features to increase security of social media accounts should also be considered.

CAO Response:

As previously stated, a large majority of accounts are set up through an employees' personal social media account. We do not have access nor should we have access to their personal information.

We do not have access to an employees' personal login information nor should we for security. Appropriate staff has been made managers of the accounts and can access the accounts if necessary.

Additionally, two-step verification is not practical with more than one account user. Twitter and Facebook do not offer two-step authentication for multi-users. Also, a two-step verification mostly works with a text to a cell phone, which could incur a cost to the employee.



However, the Office of Public Information will work with divisions to increase the complexity of their Twitter passwords.

Finding #6: Removal of Customer/Citizen Comments From Social Media Pages Should be Monitored and Approved

Priority Rating: High

Condition:

CAO Policy #50 states that only comments that violate the Customer Use Policy (contained in the Policy's Addendum C) including such things as obscene and profane language, threats or personal attacks, defamatory statements, hate speech, etc. may be removed from social media pages. The Policy does not specifically state who is responsible for removing customer/citizen comments, nor does it go into much detail on the specific procedure(s) to be followed in removing comments, but it appears that the individual social media representatives for each account are solely responsible for the removal of comments. The Policy does state that the social media representative should document the post, preferably with a computer screen capture, prior to removal.

Government Communications staff informed us of a situation where a citizen's comment criticizing a golf event was removed from a Parks and Recreation golf social media page by their social media administrator, even though it clearly did not violate the Customer Use Policy.

Effect:

Granting individual discretion for the removal of citizen comments to the various social media administrators reduces an important control feature over social media accounts.

Recommendation:

It is understood that some citizens comments may clearly violate CAO Policy #50's Customer Use Policy, and such postings should be promptly removed. However, a process should be developed whereby social media administrators notify the Division of Government Communications to obtain prior approval before removing citizen postings whenever practicable. If prior approval cannot be obtain due to circumstances such as the time of day in which the posting occurred, notice of removal should be provided to the Division of Government Communications for



review and, if necessary, reinstatement of the comment if it is not deemed an actual violation of CAO Policy #50's Customer Use Policy. In addition, the Division of Government Communications should always be provided a screen print or other documentation of all citizen comments removed from social media accounts. This requirement should be included in CAO Policy #50.

CAO Response:

It is extremely rare that comments are ever taken down or hidden. Many best practices will tell you they should never be deleted but rather hidden should there ever be a lawsuit.

Additionally, social media liaisons are already contacting the Office of Public Information prior to taking anything down to talk through the particular situation. They often call prior to posting anything that causes doubt.

Our Social Media Liaisons have attended multiple workshops that have taught best practices including the stoplight method. Green means you have clearance to post (example "baseball game cancelled due to rain"). Yellow means you need to talk to someone in your section, possibly a supervisor before posting (example, issuing a notice of a snow emergency). Red means you engage multiple supervisors, directors and/or commissioners, (example, a citizen has heard a rumor of gang activity at a park and wants to know if it is safe and what the city plans to do about it).

The example used by the auditor was an isolated incident. The incident involved a participant of a Parks and Recreation program posting information accidentally. Our staff contacted him to inform him the post would be removed and he concurred with that decision.

We will revise CAO Policy #50 to include a formal process to require all social media liaisons to obtain prior approval to hide posts that do not comply with our Customer Use Policy. It is not a practice of the LFUCG to remove posts. Therefore, the policy does not have to include language regarding the removal of posts.



Finding #7: Enhanced Monitoring Process Recommended for Social Media Accounts**Priority Rating: High****Condition:**

Proper control and monitoring of all social media accounts is an essential best practice to protect the government's "brand" and image. Authorized and known LFUCG social media accounts should be monitored for inappropriate and inaccurate content, and to see whether any LFUCG Departments and Divisions or employees may have initiated new social media accounts without following the required procedures as stated in CAO Policy #50. Social media sites should also be monitored for unauthorized and unknown accounts which may falsely associate themselves with LFUCG. Social media is particularly vulnerable to this type of false representation since social media accounts can be easily created on these sites without cost to the user.

We noted that monitoring for inappropriate, inaccurate or misleading content on known and authorized LFUCG social media accounts was sufficient, but in our opinion the process of searching for unknown and unauthorized LFUCG social media accounts is not being performed on a frequent enough basis. We performed our own search and scan for unauthorized LFUCG social media accounts, and none were discovered.

Effect:

The government's "brand" or image may be unknowingly misrepresented and damaged by unauthorized and potentially malicious social media pages representing themselves as LFUCG if social media sites are not monitored.

Recommendation:

Google searches should be done at least once per month to see if any unknown social media profiles appear for LFUCG Divisions and Departments and their various programs. If fraudulent or falsely represented accounts are found, steps should be taken to contact the owner of the account (if known, typically in the case of an unauthorized account created by an LFUCG employee) and instruct them to shut down their account. If this is not feasible, contact the appropriate social media network and request they deactivate the account and remove it. If the search discovers new accounts set up by legitimate LFUCG Departments and Divisions or employees without prior approval as required by CAO Policy #50, appropriate action



should be taken to ensure the account complies with Policy and determine if disciplinary action is warranted under CAO Policy #50 Section IV, Part 3.A.

CAO Response:

Public Information currently subscribes to a limited version of Hoot Suite which allows us to monitor all social media accounts.

Social media networks (Facebook, Twitter, etc.) will not take down an unauthorized account. The burden falls on the user to determine if it is a credible source.

Disciplinary action has never been defined.

If PIO becomes aware of an account through their routine monitoring, PIO will investigate to determine if it was created by an LFUCG employee. If they determine it was, PIO will contact the division to advise of the proper way to request an account and have the request approved. PIO will also increase awareness at a management level so that divisions are aware of the proper ways to set up an account.

The CAO and the CIO will work with the Department of Law to determine to what extent we can provide guidance concerning statements in an employee's personal social media account.

The CAO will strike the language referring to "disciplinary action" when CAO Policy #50 is revised. We will instead provide training so employees can use social media more effectively.

Finding #8: CAO Policy #50 Recommendation Regarding Frequency of New Content Not Consistently Followed

Priority Rating: Moderate

Condition:

CAO Policy #50 Section IV, Part C. (entitled "Best Practices"), under "Content/Frequency" states that "Social media accounts are not static sites: social media representatives are encouraged to post content at *least* twice a week." While three of 23 (13%) LFUCG social media accounts we examined met this recommended practice, most accounts posted new content on an average of about 5-8 times a month.



We also identified a small number of accounts where the posting of new content varied greatly due to the seasonal nature of the service provided. Examples include the Parks and Recreation accounts (Play Golf Lexington and the other golf course accounts, McConnell Springs, Raven Run Sanctuary) and some community sites such as Moondance Amphitheater. We also identified a few accounts which had not posted new content for some time, and also noted some which consistently repeated information from other LFUCG social media pages (for example, the Play Golf Lexington and the two golf course accounts for the Gay Brewer Jr. Golf Course at Picadome and Kearney Hills Golf Link).

Effect:

Providing new content on a consistent basis is vital to communicate and engage effectively with citizens on LFUCG social media sites. Visitors to social media pages may lose interest if new content is not provided on a timely basis.

Recommendation:

Government Communications should meet with social media administrators struggling to provide new content and discuss options for increasing the frequency of new content on their accounts. In those instances where there does not appear to be sufficient new content to maintain a social media account, consideration should be given to deactivating the account or merging it with another more active account, consistent with CAO Policy #50.

CAO Response:

Government Communications has been waiting for the audit to be completed before making any recommendations, improvements, updating forms, etc. Part of the plan has always been to work on consolidating accounts and working with social media liaisons. That plan will proceed now the audit has been concluded.

All account users have contacted the Office of Public Information and reported on the frequency of their posts. Those who are not posting enough have been made aware and are going to increase their posting, while others have notified the Office of Public Information of their plans to delete accounts after particular programs are complete.



Finding #9: Some Social Media Accounts Missing From LFUCG Webpage

Social Media Directory

Priority Rating: Moderate

Condition:

We compared the social media account documentation to the LFUCG social media page maintained on LFUCG's main website (www.lexingtonky.gov) and found that some accounts were not listed in the directory. The social media page is designed to provide a complete listing of all social media sites offered by the LFUCG.

We noted that the social media page was not up to date. Two accounts not listed included newly established Facebook and Twitter accounts for Social Services. Others not listed included social media accounts for Commission for Citizen's with Disabilities (YouTube account), Mayor Jim Gray (Instagram account), Lexington Emergency Management (BEREADYLEXINGTON Blog account), Lexington Fire Department (WordPress Blog account), Lexington Fire Marshall (Twitter account), Lexington Fire Jobs (Twitter account) McConnell Springs (Flickr, Twitter, Instagram, Chatter block accounts), Move It People (Facebook account), and Raven Run Sanctuary (Flickr account). We advised Government Communications of the missing accounts during the course of our audit fieldwork, and they indicated they would take the necessary steps to include these accounts on the social media directory.

Effect:

Without an up to date social media page on the main LFUCG website, the opportunity to direct citizens to social media site pages containing more information about a particular government program or service may be lost.

Recommendation:

The process of creating new social media accounts should include the addition of the social medial sites to the LFUCG's website social media page. This will provide added assurance that all appropriate links between the LFUCG main website and the various social media sites have been established for the citizens' benefit.

CAO Response:

The Offices of Public Information and Computer Services are currently redoing the city's website – lexingtonky.gov. Part of this redesign will be to include social media listings on the bottom of the appropriate web page. (Example, the Mayor's page will



list Facebook, Twitter and Instagram.) The new website should be fully functional in May/June 2016.

We could find no evidence that some of the listed “missing accounts” like Commission for Citizen’s with Disabilities YouTube or McConnell Springs Twitter, exist.

Boards and Commissions of the LFUCG do not have to adhere to CAO Policy #50. However, the PIO will search for newly established social media accounts, ensure they have been properly requested and approved, and will then add them to the Social Media page on the LFUCG website.

Finding #10: Social Media Account Tracking Metrics Can Be Enhanced
Priority Rating: Moderate

Condition:

In order to gain a clear understanding of the effectiveness of social media, the performance of social media accounts should be tracked with appropriate metrics. There are a number of ways to measure whether accounts are achieving their desired objectives, including how the content provided is consumed and shared, and whether user activity is increasing over time.

LFUCG obtained social media management software called Hootsuite in April 2015 as a tool to assist in measuring and evaluating its social media accounts’ performances. Hootsuite has several different online offerings for its customers, including a free basic Hootsuite version, Hootsuite Pro, Hootsuite Business, and Hootsuite Enterprise. The versions provide increasing levels of account management, monitoring, tracking, and reporting capabilities. Currently, LFUCG has the Hootsuite Pro version which, for a minimal monthly fee, provides social media message scheduling, account monitoring and tracking, as well as some limited reporting capabilities.

Hootsuite Pro offers useful information and metrics. However, we noted that its tracking metrics and reporting options are not being used to their full capabilities by either Government Communications or the Mayor’s Communications Office, possibly due to limited staffing resources. The limited reporting and tracking metrics we were provided were derived from the various social media websites rather than



being obtained from the Hootsuite software. The reports provided to us were very basic, had limited distribution, and were confined to one or two accounts. Government Communications personnel stated that they plan to add additional staff, with one employee being dedicated to the management of social media accounts and to take fuller advantage of the Hootsuite software. They also stated they have been researching the possibility of upgrading their Hootsuite software to the Enterprise level to increase their tracking metrics and reporting capabilities.

Effect:

Tracking metrics are a useful tool for measuring the effectiveness of social media accounts. Without the use of metrics to measure social media accounts against established goals, social media accounts may fail to achieve desired results. Metrics can also be useful in determining what content is appealing and useful to social media users so that similar content may be replicated in the future.

Recommendation:

The use of tracking metrics and related reports should be increased for LFUCG social media accounts in order to better evaluate the effectiveness of these accounts. In order for the metrics to best serve the needs of the LFUCG, specific and measurable goals should be established for each social media account, consistent with the objectives of the LFUCG and the various Divisions/Departments.

CAO Response:

The level of Hoot Suite we subscribe to does not provide a detailed metrics report, which is why we use the native apps.

Additionally, Hoot Suite is not necessary to track social media accounts' performances. Analytics are available for free on individual social media platforms and social media liaisons can easily see this data.

The Office of Public Information is aware that many liaisons currently do utilize analytics and provide reports to their supervisors.

The analytics provided by the native services are adequate. HootSuite is not necessary to gather data. The social media platform currently allows statistical information to be obtained to track user interaction and determine page performance. The PIO will use the statistical information to track citizen interaction with our social media and work with divisions to enhance the effectiveness of their social media use.



PIO will work with supervisors to determine what their divisional goals are for the use of social media and will provide guidance and proper training to meet or exceed those goals. PIO is currently monitoring social media on a daily basis.

Finding #11: Organization-Wide Social Media Governance Needed
Priority Rating: Moderate

Condition:

Most LFUCG social media accounts were initially established by individual employees within different LFUCG Departments and Divisions, and prior to CAO Policy #50 they operated independently without a unified policy. Those LFUCG Departments and Divisions created, updated, and maintained their own social media presences on various social media platforms according to real or perceived social media needs. With the issuance of CAO Policy #50, some structure and governance was placed over LFUCG social media accounts, including the monitoring of content and the approval of new accounts.

However, as pointed out to us by the Chief Information Officer, CAO Policy #50 was issued a year and a half ago, and since that time social media has evolved significantly. The Chief Information Officer also stated that social media is still in a state of evolution, and is replacing email as the typical means by which most citizens communicate and interact with the LFUCG.

Effect:

CAO Policy #50 represented the LFUCG's first significant action towards developing a unified approach to managing social media and harnessing its power of communication with the citizens of Fayette County. Although the Policy established the ground rules for LFUCG social media, the rapidly evolving nature of social media transcends the effectiveness of a Policy and requires an additional management process.

Recommendation:

A standing Social Media Board or Steering Committee should be established to provide governance over the LFUCG social media activity. The Board or Committee's governance activities may include the establishment of a unified social media strategy, monitoring of social media activity to ensure adherence to that



strategy, and assisting Departments and Divisions to assess the emerging opportunities and innovations social media presents to the LFUCG. The Board or Committee should either include or report to the Chief Administrative Officer and the Chief Information Officer. CAO Policy #50 should be amended to include the establishment of this governing body and define its powers and duties.

Furthermore, in order for this governing body to function most effectively, a process also needs to be developed whereby each Department or Division has a designated employee dedicated to the monitoring of social media messages issued by the various social media outlets that may exist within their Department or Division. This designated employee would report the results of the Department or Division social media activity to the responsible Commissioner or Director to increase their awareness of social media activity under their control. This information would also be provided to the Social Media Board or Steering Committee to provide the ongoing governance described above. CAO Policy #50 should also be amended to include this process.

CAO Response:

PIO currently has a standing communications staff meeting that meets twice a month where all communications activity, including social media, is discussed. This meeting involves the Mayor's communication director and information staff representing Government Communications, Police, Fire, Community Corrections, Emergency Management, Environmental Quality/Public Works and Parks & Recreation.

Many divisions already compile a monthly social media report that is submitted to supervisors. These reports document what posts/messages were published on social media for the month as well as the overall reach of each message, thereby allowing social media communicators and supervisors to track the effectiveness of their social media strategy.

The CAO will not form a new board or steering committee at this time. PIO's monthly meetings will include a more robust discussion of social media and can be expanded to include additional attendees when necessary.



Appendix A. LFUCG Social Media Directory

GOVERNMENT

	Facebook	Twitter	YouTube	Misc.
Bluegrass Farm to Table				
City of Lexington				
Commission for Citizens with Disabilities				
Family Care Center				
Government Television (GTV3)				
Lexington Area Metro Planning Organization				
Lexington Homelessness Prevention & Intervention				
Mayor Jim Gray				
Mayor's Youth Council				
Partners for Youth Foundation				
Social Services				

COUNCILMEMBERS

	Facebook	Twitter	YouTube	Misc.
Vice Mayor – Steve Kay				
Council 2nd District – Shevawn Akers				
Council 7th District – Jennifer Scutchfield				
Council 8th District – Fred Brown				
Council 9th District – Jennifer Mossotti				

PUBLIC SAFETY

	Facebook	Twitter	YouTube	Misc.
Lexington Emergency Management				
Lexington Fire Department				



Lexington Fire Department Recruitment



Join the Lexington Police Department



Lexington Police Activities League



Lexington Police Explorer Post 357



Lexington Police



LexWrecks



RECREATION/ENVIRONMENT

[Facebook](#) [Twitter](#) [YouTube](#) [Misc.](#)

Gay Brewer Jr. Golf Course at Picadome



Kearney Hill Golf Links



Keep Lexington Beautiful



Kiddie Kapers & Company Dance Program



Lexington Parks & Recreation



Live Green Lexington



McConnell Springs



Play Golf Lexington



COMMUNITY

[Facebook](#) [Twitter](#) [YouTube](#) [Misc.](#)

Bike Lexington



Downtown Arts Center



Legacy Trail



Moondance Amphitheater



Appendix B. CAO Policy #50 – Social Media Policy

Chief Administrative Office	Date of Issue	Expiration Date	No.
A. POLICY MEMORANDUM	Nov. 18, 2014	N/A	50
TO: ALL Divisions and Departments		Subject:	
SIGNATURE:		Social Media Policy	

I. PURPOSE

In an effort to be transparent, informative and convenient to visitors and citizens, the Lexington-Fayette Urban County Government (LFUCG) communicates with the public through several social media channels. This type of communication is immediate, two-way, and can have a significant effect on public perception and actions. This social media policy establishes a process for establishing and maintaining social media accounts to protect LFUCG divisions and personnel.

II. APPLICABILITY

This policy applies to all LFUCG divisions and users, including employees, contractors, consultants, temporaries, interns, volunteers and other workers within local government. This policy applies to the use of social media in the course of conducting official City business, and does not address employees' personal use of social media outside the workplace. All divisions and LFUCG programs must adhere to this policy.



III. DEFINITIONS

A. Social Media – Media designed to be disseminated through social interaction and consisting of user-generated content using highly accessible and scalable publishing technologies including, but not limited to Facebook, Twitter, YouTube, LinkedIn, blogs, wikis, photo-sharing networks, online communities, podcasts, user-generated videos, message boards, RSS feeds, and similar technologies.

B. LFUCG Social Media Representative – LFUCG employee or official who has been afforded username and password access to an LFUCG social media site and who contributes content in the name of or on behalf of LFUCG and/or any LFUCG department, division, official, or employee, following the guidelines within this Policy.

IV. POLICY

A. Approval of Social Media Accounts

1. LFUCG Divisions, organizations or programs that wish to create a new social media account or maintain an existing one shall complete the Social Media Account Request Form [**ADDENDUM A**]. This request form must be submitted to the Office of the CAO for approval. This form requires prospective social media representatives to identify the purpose, audience and goals for the account. Divisions and organizations should consider if existing platforms or sites could be utilized or merged instead of establishing new accounts.
2. Requests for a social media account are subject to approval by the division director, commissioner and Chief Administrative Officer (CAO). Requests shall be reviewed by the Division of Government Communications and the Mayor's Director of Communications or his/her designee, who will issue a recommendation to the CAO. Copies of the final written approval shall be retained by the Division of Government Communications, the Division of Computer Services and the Mayor's Director of Communications.
3. No person subject to this policy shall create an LFUCG social media account without following the provisions herein. Existing social media sites shall be identified, reviewed, and amended if necessary to come into compliance with this policy. Failure to comply with this policy may result in disciplinary action.



B. Administration of Social Media Accounts

1. Approved social media representatives shall complete the Social Media Authorization Form [**ADDENDUM B**]. This form must be submitted to the Office of the CAO for approval.
2. The Social Media Authorization Form is subject to approval by the division director, commissioner and Chief Information Officer (CIO). Copies of the final written approval shall be retained by the Division of Government Communications, the Division of Computer Services and the Mayor's Director of Communications.
3. Links to approved accounts shall be posted to the LFUCG social media directory on the city's website and Intranet.
4. LFUCG social media users shall not share login information or passwords. Division directors and/or commissioners shall immediately notify the Divisions of Government Communications and Computer Services of any changes to the account authorization form. This process ensures that the credentials for accessing social media accounts are available in the event of an emergency, employee termination or retirement, etc.
5. The Division of Government Communications and Mayor's Director of Communications or their designee shall monitor content on LFUCG social media accounts to ensure adherence with the guidelines herein.
6. Content not consistent with this policy shall be removed immediately. The CAO, CIO or their designee may disable an LFUCG social media account or remove a social media representative from the account at any time and for any reason, including, but not limited to:
 - any violation of this policy
 - unprofessional use of the account
 - lack of use or disinterest by the public
 - failure to meet the purpose and goals approved in the Social Media Request Form
 - security breach



C. Best Practices

1. **Terms of Service:** Terms of Service (TOS) clauses vary across social media platforms; as such, divisions and organizations should carefully read the TOS of each social media tool before establishing an account.

2. **Branding:** LFUCG social media accounts shall be clearly branded as an official government presence and shall link back to the appropriate lexingtonky.gov website. It is important to represent the City with a consistent message across all forms of communication, including websites, social media, and printed materials.

3. **Disclaimers:** All LFUCG social media accounts shall link to the city's Customer Use Policy [**ADDENDUM C**]

4. **Content/Frequency:** Content posted by an LFUCG social media account should be considered official government communications. Social media accounts are not static sites; social media representatives are encouraged to post content *at least* twice a week. Content should relate to the mission, activities and policies of the relevant LFUCG division or organization, as outlined in the approved Social Media Request Form. Social media representatives shall obtain proper license or permission to post copyrighted material, such as photographs and videos, that is not created by or owned by LFUCG. Content should be timely, engaging, accurate, free of grammatical and spelling errors, professional, inclusive and up-to-date. Before posting, consider potential reactions to the content. When in doubt about posting an item, social media representatives should consult with a supervisor, the Division of Government Communications, or the Mayor's Director of Communications.

5. **Prohibited Content:** Social media accounts created on behalf of the LFUCG shall not contain any of the following:
 - Nonpublic information of any kind
 - Personal information that would violate the Health Insurance Portability and Accountability Act (HIPAA) Privacy Rule
 - Personal, sensitive or confidential information of any kind
 - Information that could compromise public safety or an ongoing investigation
 - Content that promotes, fosters, or perpetuates discrimination on the basis of race, creed, color, age, religion, gender, marital status, sexual orientation, status with regard to public assistance, national origin, physical or mental disability
 - Obscene, indecent or profane language
 - Threats, personal attacks or defamatory statements
 - Fraudulent, deceptive or misleading information
 - Promotion or endorsement of services and products



- Comments advocating illegal activity or posting of material that violates copyrights or trademarks of others
- Content that violates any local, state or federal laws and/or is otherwise unlawful
- All campaign materials
- Items regarding litigation or pending litigation

6. **Moderating Customer Input:** By definition, social media accounts encourage the exchange of ideas and information, allowing users to ask questions and voice their opinions. Some of those comments may be negative or unsavory. Social media representatives should check their accounts daily for feedback and, if necessary, respond as quickly as possible.
7. **Removing Comments:** Generally, only comments that violate the LFUCG Customer Use Policy [ADDENDUM C] may be removed from an account:

- Obscene, indecent or profane language
- Threats, personal attacks or defamatory statements
- Hate speech directed at race, color, gender, sexual orientation, national origin, ethnicity, age, religion or disability
- Fraudulent, deceptive or misleading information
- Comments not related to the posted topic for the LFUCG social media page or post
- Multiple, successive off-topic posts by a single user or repetitive posts copied and pasted by multiple users, or spam
- Promotion or endorsement of services and products
- Comments advocating illegal activity or posting of material that violates copyrights or trademarks of others
- Content that violates any local, state or federal laws and/or is otherwise unlawful
- Campaign materials promoting or opposing an individual in an election for political office

Before removing a comment, the social media representative must document the post, preferably with a screen capture.

8. **Other Policies:** Use of a LFUCG social media account shall comply with other LFUCG regulations, policies and procedures, including but not limited to:
 - Code of Ethics
 - CAO Policy 8R: Open Records Policy
 - CAO Policy 25: Computer Use Policy
 - CAO Policy 44: External Links & Websites Policy



9. **Open Records:** LFUCG social media accounts are subject to the Kentucky Open Records Act. Any content maintained in a social media format that is related to LFUCG business, including a list of subscribers and posted communications, is a public record. Wherever possible, such sites shall clearly indicate that any articles and any other content posted or submitted for posting are subject to public disclosure under the Kentucky Open Records Act.

