

Social Media Review

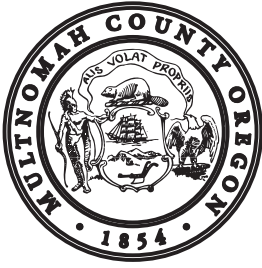
August 2011

Steve March
Multnomah County Auditor

Audit Staff
Fran Davison
Craig Hunt



We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.



Office of Multnomah County Auditor

Steve March
County Auditor

501 SE Hawthorne Room 601
Portland, Oregon 97214
Phone: (503) 988-3320

Fran Davison
Judith DeVilliers
Shannon Grzybowski
Craig Hunt
Amanda Lamb
Shea Marshman
Mark Ulanowicz

Date: August 23, 2011

To: Jeff Cogen, Multnomah County Chair
Deborah Kafoury, Commissioner District 1
Loretta Smith, Commissioner District 2
Judy Shiprack, Commissioner District 3
Diane McKeel, Commissioner District 4
Michael Schrunk, Multnomah County District Attorney
Dan Staton, Multnomah County Sheriff

From: Steve March, Multnomah County Auditor
Re: Social Media Review

Social media is a group of communication tools that can be used to reach the public and is increasingly being adopted by County departments as part of their communications strategies. While there are many benefits of using these tools they are not without risk.

This review of Social Media at the County is a high-level snapshot in time of rapidly changing and developing practices, an example of which is the recently released cell phone app by the Multnomah County Library. The practices have contributed to increased communication and awareness of some County programs and issues. Although there do not appear to be any significant problems to date, we believe that County social media policies and guidelines do not address all of the concerns that some governments and advisors believe are necessary to include in the use of social media. We believe there are various ways the County can address those short-comings and per the steps outlined in the attached response believe the County is committed to that.

We would like to thank staff from the Communications Office, the Library, the County Attorney's Office, County IT, and the Health Department who provided background information. And, we appreciate the assistance we received from the many departments and agencies that provided information on how they use social media in their communication activities.

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Social Media Review

Summary

Social media is a group of new Internet-based communication tools that several County departments are using as part of their communication strategy. The Auditor's Office looked into the uses, benefits and risks associated with the County's use of social media. This report discusses strengths and weaknesses in County social media policies, the benefit of guidelines to supplement policies and the need for a governance structure to provide oversight of social media use as it continues to grow and evolve. By providing additional guidance and oversight, the County will be better positioned to take advantage of the opportunities presented by social media while being prepared to manage the risks associated with this expanding technology.

Background

Though many definitions exist, social media is consistently characterized as the Internet-based technologies, tools and practices that people use to share opinions, insights, experiences and information. Social media can share information in many different forms, such as text, images, audio and video. Popular social media sites include services such as Facebook, YouTube, MySpace, Flickr, LinkedIn and Twitter. Use of these popular, user-friendly sites is free and new accounts can be created in minutes.

The sites have different formats and lend themselves to various types of information exchange. For example, with Facebook, an individual or organization creates a page and can post a variety of information in various formats, including text, photos, and video. People who view the page can provide feedback and this feedback becomes part of the page. Twitter, on the other hand, is a vehicle for sending out short, real-time messages that can be easily received on hand-held devices like smart phones and quickly and easily forwarded to other users.

The role of technology in the workplace is changing and now often includes social media communication tools, creating opportunities for governments to use new channels to deliver information and communicate directly with citizens. These commonly used social networking tools have a large number of users and governments are increasingly turning to these communication tools as a way to reach and engage citizens. Multnomah County departments, agencies and divisions have created blogs and on-line communities and use sites such as Twitter, Facebook and YouTube to engage, inform and interact with the public. Citizens can access many County social media accounts from the County website or a personal Facebook or Twitter account.

County Social
Media Sites

There are 15 Twitter and 9 Facebook accounts listed on the Multnomah County Communications' Social Media webpage. Many of these accounts were established during 2009. The most recent additions are The Office of Equity and Diversity accounts, started in December 2010, and the Health Department "It Starts Here" Facebook account, started in February 2011. Some departments and agencies, such as Animal Services and the Office of Equity and Diversity, post information and updates nearly every day, often linking to articles on their websites or to informative or educational links. Other departments and agencies post less frequently. Representatives we spoke with said they try to post meaningful information that citizens will find useful or informative.

The Library also posts daily to connect with patrons, inform citizens and to promote new and existing services. They have an active social media following, recently reaching 14,000 Facebook fans as announced in a recent Facebook post. The County's General Information (Communications Office) Twitter account has nearly 3,000 followers. Other County accounts have fewer than 1,000 fans or followers.

Below we have listed some typical uses of social media along with examples of what County social media sites are offering.

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Engage and inform the community

- The Library uses its Facebook page to engage with patrons, seek feedback to guide programs, announce new offerings and inform the community of library events and closures.

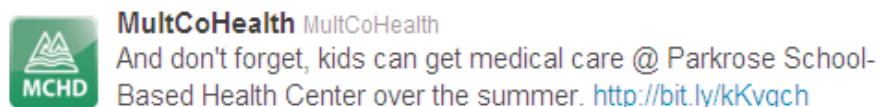
Multnomah County Library Facebook post



Source: Facebook

- Elections posts information on candidate filings and elections-related announcements and deadlines.
- The Sellwood Bridge Twitter account provides updates on the status of this major project.
- The Office of Citizen Involvement uses Facebook and Twitter to encourage citizen input into County decision-making and increase participation in County activities and events.
- The Health Department uses Twitter to inform citizens on health related issues and events.

Multnomah County Health Department Twitter post



Source: Twitter

Increase public awareness

- The Office of Equity and Diversity uses social media to inform the public on topics related to its mission such as multi-cultural events, awards for promoting diversity and job opportunities.
- Animal Services provides information on upcoming events, showcases pets available for adoption, and provides information to educate citizens about responsible pet ownership.

Multnomah County Animal Services Facebook post



Multnomah County Animal Services

Petlandia is this Saturday! Come on out and catch the "Pitties in Pink" at the Troutdale Summerfest parade through historic downtown Troutdale. Then catch the free trolley to the shelter to enjoy vendors, training demos, music, raffle prizes, tattoos and meet adoptable pets. (Or you can come straight to the shelter too!) <http://bit.ly/jhQOHe>



Wall Photos

Source: Facebook

- The Office of Emergency Management posts public safety-related information such as earthquake preparedness as well as links to videos and other resources.

Reach populations that may not be reached by traditional media

- The Health Department STD Twitter account allows clients to check for appointment times.

Recruit employees

- The Multnomah County General Information and the HR/IT accounts post job announcements in an effort to reach a broader audience.

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Multnomah County General Information Twitter post



multco Multnomah County, OR

Love to teach? Basic Skills Educator job open at Londer Learning Center. See all jobs at www.multco.us

Source: Twitter

Tell your story

- Multnomah County General Information uses Facebook and Twitter to talk about recent board decisions, County projects, budget updates and community events and partnerships that tell the story of Multnomah County government activities. Posts frequently include a link back to the County website.

Benefits and Risks As with any new initiative, it is critical to consider risks versus benefits when deciding on a social media strategy. Social media is a new and evolving technology and governments are still trying to determine its value and associated risks. Because this area is still relatively new and unexplored, the full range of risks and benefits remains to be seen.

Benefits of using social media include improving the County's ability to communicate and collaborate with citizens and each other. Key benefits of social media include:

- Ability to direct the information and tell an unfiltered story
- Ability to provide information in real time with real-time updates
- Opportunity to engage and interact with the public
- Opportunity to build relationships

Associated risks may be reputational, legal or security-related. Key risks include:

- Lack of control over content and reputational risks
- Legal issues of freedom of speech and privacy
- Non-compliance with record management and retention regulations
- Security issues such as password protection, viruses, malware and hijacking

Scope, Objectives
and Methodology

In the context of the potential benefits of using social media as a communications vehicle and the associated risks, our objectives for this audit were to:

- Determine whether County and individual department social media policies and guidelines are in line with best practices and sufficient to address County needs.
- Determine whether an adequate organizational structure and governance exists to manage social media and capitalize on benefits while mitigating risks.

We analyzed Multnomah County social media policies to determine how well County, Library and Health Department policies addressed the issues identified in best practice literature. We also attended trainings, and conducted interviews with County employees and representatives from other jurisdictions. We limited our review to new technology communication tools used by County departments and agencies to communicate with the public.

We conducted this special study in accordance with generally accepted government auditing standards. Those standards require that we plan and perform an audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our objectives.

**Results County policies do not fully address all policy elements
identified in best practices**

Best practices recommend written documentation that ensures all employees and staff understand their roles and responsibilities, and the objectives and purpose of using social media within the agency. Although County-wide social media policies provide a core foundation, they can be difficult to read and apply practically. Moreover, no department or agency is charged with providing governance or structure to County social media activity. County policies provide guidelines for individual employee use of social media but there is no structure in place to provide oversight as agencies continue to develop a social media presence.

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Essential Elements of a Social Media Policy

The Center for Technology in Government at the University of Albany, works with governments to foster public sector innovation and support good governance. To better understand the components of social media policies in government, they analyzed government social media policies and conducted interviews with government professionals¹ to identify core elements of a government social media policy. Their analysis identified eight essential elements of a social media policy. Descriptions for each of the eight elements presented below are taken from the Center for Technology in Government report, *Designing Social Media Policy for Government: Eight Essential Elements*.

1. **Employee Access** - delineates who and under what conditions employees access social media tools from a government-owned network or device. This element includes employee access for personal, professional (e.g. job related use of social media such as blogs) and agency use (posting on behalf of the County or agency).
2. **Account Management** - encompasses the creation, maintenance, and destruction of social media accounts. This element discusses the importance of governance and overall management.
3. **Acceptable Use** - outlines how employees are expected to use agency resources, restrictions on use for personal interests, and consequences for violating the policy.
4. **Employee Conduct** - addresses what is “right” and “wrong” in terms of employees’ behavior when engaging with social media tools or on social media platforms as an employee of a particular agency.
5. **Content** – discusses who is allowed to post, and who is responsible for monitoring accuracy and ensuring guidelines are followed. Content management strategies include editorial controls or assignment of content to certain employees.

¹ Policy documents were collected between October and December of 2009; interviews were conducted between December 2009 and February 2010.

6. **Security** - outlines security procedures employees must follow when using social media tools.
7. **Legal Issues** – are connected to agency and employee use of social media tools. This element discusses privacy, free speech, freedom of information, public records management and retention, public disclosure, and accessibility.
8. **Citizen Conduct** - refers to setting protocols for the appropriate conduct of citizens on an official agency social media site and how inappropriate conduct should be handled. If comments from the public are allowed, how will comments be monitored?

County Social
Media Policy

In 2008, the library consulted with the County Attorney's Office to develop a policy to guide employee use of social media, as well as comments from the public. Subsequently, the Public Affairs Office led a cross-functional Social Media Policy work group to examine social media related issues and draft a policy. The policy work group included members from the Library, the County Attorney's Office, Information Technology, Human Resources, and Labor Relations. The work group developed a policy focused on employee use of social media. In July 2010, Rule 3-36 "Social Media" was implemented and Rule 3-35 "Use of Information Technology" was updated to include references to social media. The social media policy work group disbanded once the policy was completed. Shortly thereafter the Health Department developed department-specific policies to provide employees with additional guidance for account development and using social media tools.

Policy Gaps Reveal Areas
for Improvement

Using the Eight Essential Elements as a framework, we analyzed Multnomah County social media policies to determine how well County, Library and Health Department policies address the Eight Essential Elements. Since the Library and Health Department policies supplement County-wide policies the following discussion focuses on County-wide policies only.

While most elements are addressed to some degree, we found weaknesses in County policies that could be strengthened by

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revising the policies or by creating guidelines for using social media. Based on the Eight Essential Elements, we identified the following areas for improvement.

Account Management

- County policy does not provide specific guidance for establishing or maintaining accounts. There is no reporting mechanism to alert County leadership of new accounts, no training on developing a communication strategy or posting content and no overall governance structure in place to guide decision makers. Without some sort of governance, the County may be vulnerable to mixed messages or conflicting information being sent out.

Acceptable Use and Employee Conduct

- Employee behavior is frequently cited as an area of risk associated with social media; best practices recommend training in this area. Risks include reputational damage from inappropriate posts and using personal accounts to communicate work-related information resulting in privacy violations or release of confidential information. The personal use of social media in the workplace that could result in lost productivity may need to be addressed at some point. Best practice literature also mentions the blurring boundaries around personal, professional and official agency use which may also need to be addressed as use of social media evolves.

Legal Issues and Citizen Conduct

- County policies address a number of legal issues related to social media including privacy, record retention, free speech and citizen conduct. However, we found a lack of consistency in practices regarding record retention policies and moderation of citizen comments. Noncompliance in this area could result in legal sanctions against the County. Best practices recommend consistent policies for record management and guidance for moderating citizen comments.

Security

- County IT managers are confident that security related issues are appropriately monitored and do not pose significant risks at this time. However, we found a lack of password management and account transition practices that could lead to damage to County reputation or access to the County network by unauthorized personnel. Best practices recommend employee awareness training to inform employees of the risks involved with using social media sites.

Content

- County policy directs employees to obtain departmental authorization to post from a County site and provides limited information on content management strategies. Content guidelines could provide tips and techniques on message development and posting content.

Employee Use

- County policies address who and under what conditions employees may access social media tools from a County-owned network or device. Departments may restrict use further.

Best Practices Recommend
Establishing a Governance
Structure

No department or agency is charged with providing governance or structure to County social media activity. Best practices recommend establishing a governance structure with oversight responsibility for guiding social media activities throughout the organization. County policies help guide individual employee use of social media but there is no structure in place to provide oversight or even assistance or guidance as agencies continue to develop a social media presence.

In 2009 as departments were setting up their first social media accounts, the Public Affairs Office provided leadership and informal oversight in three key areas:

- Leading a cross-functional group to develop a social media policy
- Creating and leading a user group which met bi-monthly
- Providing advice to County departments considering social media accounts

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As departments began to set up new accounts, they conferred with staff from the Public Affairs Office for advice and expertise on establishing a social media presence. With recent changes, the Public Affairs Office (now the Communications Office) no longer performs these leadership functions.

Decentralized governance of social media has the advantage of providing flexibility in a rapidly changing area. Departments establish social media sites independently and are free to develop their own protocols and ensure they are followed. However, as social media evolves and expands, sufficient oversight and guidance is still needed to prevent misunderstanding of legal and security issues, inconsistent processes and misalignment of content with County priorities. Equally important, account holders may be missing opportunities to maximize the benefits of social media that could be addressed by a more structured form of governance.

Governance can take many forms including assigning responsibility to a specific department or forming a committee or task force composed of representatives from various offices such as Communications, County Attorney's Office, IT, and Human Resources. An oversight entity could meet periodically to provide regular review and identify best practices that would help ensure long-term success and mitigate risks.

In this new and fast moving environment, it would be beneficial to establish an oversight group to track social media trends and activities within County departments, to provide leadership, and ensure legal and operational issues are addressed so that the County is prepared to meet these demands as this technology evolves.

Recommendations We have the following recommendations.

1. The County should adopt a set of social media guidelines to supplement current policies. In addition to providing easy-to-follow assistance to social media users, the guidelines should address areas of risk identified in this report that are not fully covered in current policies. Guidelines

could be adapted from examples such as the State of Oregon's State Guidelines, Social Networking Media or the federal General Services Administration's Social Media Navigator. Both examples, written in narrative format, discuss risks and concerns of social media, outline factors to consider before setting up a social media account, address user responsibilities, and provide advice and tips on communication strategies. Guidelines could be updated periodically as experience and technology evolves.

2. County-wide training could be provided on the benefits and risks associated with social media. A strategy to address risks should focus on user behavior through policies, guidelines and supporting training and awareness programs that cover:
 - Personal use in the workplace including discussion of work-related topics and inappropriate content or conversations;
 - Personal use outside the workplace including disclaimers if identifying the County as employer and risks of posting personal information; and
 - Approved County use of social media including approval process for use, public record laws and how to handle citizen comments.

Some jurisdictions have incorporated training into guidelines while others have developed more specific training programs. For example, North Carolina has an on-line training program that covers an overview of social media tools, public records law, privacy, terms of service, appropriate communication and advice with tips and tricks.

3. To address the risks associated with social media, the County should establish a governance body to monitor the use of social media throughout the County and encourage best practices for use of social media as it evolves. A governance body could include representatives from each department as well as the County Attorney's Office, Human Resources, Communications, and Information Technology. A governance body could oversee modification of guidelines for social media use, discuss emerging issues and provide guidance on moderating citizen comments, record retention procedures and posting terms of use.

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References King County Social Media Handbook
 State of Oregon Social Network Guide
 General Services Administration Social Media Navigator
 www.govloop.com

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Responses to Audit



Jeff Cogen, Multnomah County Chair

501 SE Hawthorne Blvd., Suite 600

Portland, Oregon 97214

• Phone: (503) 988-3308

Email: mult.chair@co.multnomah.or.us

Sept 6, 2011

Steve March
Multnomah County Auditor
501 SE Hawthorne
Portland, Oregon 97214

Dear Steve,

Thanks to you and your staff for your Social Media Review for Multnomah County. I'm grateful to the Auditor's office for taking a look at emerging technologies and offering guidance on how the county can best use these tools.

I view the County's use of social media as one part of a communications strategy to better inform the public, taxpayers and service consumers about county services. I also believe that the use of social media, or the publication of information on social media sites in the form of a "tweet" or a Facebook update, should be governed by existing regulations that guide other kinds of public information sharing.

The County is a complex organization with many departments and divisions, each with differing communications needs, and as pointed out in your report, differing approaches to using social media tools to spread their message. Departments also adhere to different regulations and laws which guide their release of information, such as the Health Department's HIPAA privacy rules.

Given the various levels of use of social media and the way it is developing at the County, we feel the major governance and guidance in the use of social media should fall to the departments and divisions. As to the specific recommendations contained in this report:

- I will direct departments to consult the guidelines that you have noted, specifically the State of Oregon's State Guidelines, Social Networking Media and the federal General Services Administration's Social Media Navigator, as well as consult with the County Attorney's Office.
- I will consult with Human Resources to see if training could be developed or is available, including the possibility of peer training from County staff with social media experience.
- I recognize there is some risk in the development and use of social media without a broad policy. But I also recognize the diversity of needs throughout the organization and don't want to stifle the creativity in the use of rapidly developing technology. Recognizing these factors, I will direct departments to consult with the Communications Office and report to the Chief Operating Officer on any new or expanded use of social media tools.

Thank you again for this interesting report and we will continue to track its use and development within the County.

Best regards,

Jeff Cogen
Multnomah County Chair