



# MARKETING AND SOCIAL MEDIA AUDIT

March 2020

**CENTRAL  
FLORIDA  
EXPRESSWAY  
AUTHORITY**

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# EXECUTIVE SUMMARY



## Overview

### Overview

In accordance with the fiscal year 2020 Internal Audit Plan, Internal Audit reviewed the policies and procedures surrounding Central Florida Expressway Authority (“CFX”) social media management and communication plan. This audit has not been performed previously for CFX.

CFX began using social media on a frequent basis after the statewide centralized customer service system (CCSS) was put in place to support SunPass toll collections. CFX has its own back office and brand, E-PASS, and is not part of the statewide CCSS. In order to effectively respond to CFX customer issues relating to the SunPass system that began in 2018, such as backlogged tolls, billing questions, and long customer service wait times, CFX began a program to leverage social media to respond timely to customer inquiries and to differentiate its brand during a difficult time in SunPass tolling. CFX has continued to be progressive in its use of certain social media platforms for branding purposes, customer outreach initiatives, and to provide an avenue for customers to contact the agency.

CFX procures consulting services from the following outside vendors as part of the social media management process:

1. Day Communications for Public Outreach Education and Communications Consultant Services, which includes assisting with CFX’s overall goal to increase community reach through social media platforms and social media strategy development.
2. Doverwood Communications as an approved subcontractor to the Day Communications contract. Doverwood provides social media subject matter expertise to support Day Communications in the services being provided to CFX.

CFX and its consultants utilize three platforms to manage its social media communications via a variety of channels, including Twitter, Instagram, and Facebook. The three management platforms are Hootsuite and Sprout Social as general social media management and scheduling tools, and Basecamp as a project management tool. CFX maintains the accounts with Hootsuite and Spout Social; however, the Basecamp application is owned by Day Communications.

### Objectives

The objectives of this audit were to (1) Evaluate CFX’s social media management practices, including the management of CFX communication, social media risks, and internal controls, and (2) Compare CFX’s social media management practices to other organizations of similar complexity for opportunities to adopt leading practices.

# EXECUTIVE SUMMARY



## Project Scope and Approach (Continued)

This audit was performed using a three-phased approach as outlined below:

### Phase I – Documentation of Current State Social Media Management Process

Internal Audit documented the current state of social media management and communication processes through interviews with key management personnel and review of existing policies and procedures.

### Phase II – Comparison of Social Media Management Process to Peers

Internal Audit performed a benchmarking comparison of CFX's social media strategies and key controls against those of four peers, including three tolling agencies and one private company in order to identify opportunities for improvement and further understand level of maturity in the CFX social media process.

### Phase III – Assessment and Test of Key Controls for Design Effectiveness

Internal Audit reviewed CFX's processes, policies, and procedures related to social media management against Protiviti's leading practice framework of eight social media risk management processes. Key internal controls within each risk area were identified and tested. A summary of the procedures performed, results, and observations are provided on the following pages.

#### The Eight Core Social Media Risk Management Processes

Develop and Communicate Strategy – *Social media plan aligned with CFX strategy*

Sustain Leadership – *High-level governance and oversight exercised over program and policies*

Promote Culture – *Policies and training support awareness, participation, exposure, and alignment*

Manage Community – *Processes and procedures govern incident response, marketing, and community outreach*

Refresh Content and Programming – *Sharing and posting of information follows a managed process*

Enforce Policies and Governance – *Policies govern acceptable use, security, and risk management*

Deploy Tools – *Processes guide management of tools/platforms*

Measure and Report – *Monitoring of key metrics supports evaluation of results and drives strategy*

# EXECUTIVE SUMMARY



## Summary of Procedures and Results

Core Risk	Key Areas Reviewed	Total Controls Tested	Number of Opportunities	Opportunity Reference	Relative Priority
Develop and Communicate Strategy	Marketing campaign strategy and social media impact	2	-	-	-
Sustain Leadership	Senior leadership involvement in social media processes	1	-	-	-
Promote Culture	Internal social media processes; Employee, contractor, and vendor policies; Social media training and awareness	3	1	1	1 - Moderate
Manage Community	Selection of appropriate platforms; Platform access restrictions; Social media communication monitoring; Social media incident response	4	-	-	-
Refresh Content and Programming	Social media procedures and brand management	3	-	-	-
Enforce Policies and Governance	Review of social media management, policies and procedures; Legal and compliance implications; Access to sites and security	6	3	2, 3, 4	2 - Moderate 3 - Moderate 4 - Low
Deploy Tools	Social media tools and change management; Vendor involvement and contracts	4	-	-	-
Measure and Report	Social media metrics and reporting	1	-	-	-
TOTALS:		24	4	-	-

# EXECUTIVE SUMMARY



## Summary of Peer Benchmarking Results

The following benchmarking comparison was created to depict CFX's social media process maturity against those of four peers. Internal Audit performed inquiry with Peers 1-3, which are comparable in size and/or industry to CFX. Peer 4 is a large, Central Florida-based company with a significant social media presence and prevalence in the local community. No testing outside of inquiry was performed over any peer group. The peer benchmarking was considered in developing opportunities for CFX to consider to enhance the maturity of its social media program.

Topic	CFX	Peer 1	Peer 2	Peer 3	Peer 4
Size of Company / Employees in Social Media	80 employees / 3 social media employees (1 open position)	6,500 employees / 2 social media employees	Fewer than 100 employees / 3 social media employees	50 employees / 3 social media employees	20,000+ employees / 8+ social media employees
Social Media Vendor/Consultant	X	X		X	
Additional Social Media Platforms Used (Other than Twitter, Instagram, Facebook, and YouTube)			LinkedIn		Snapchat, Pinterest
Senior Management Involvement	X				X
Employee Social Media Use Policy	X	X		X	X
Contractor Social Media Use Guidelines			X		
Social Media Refresh Acknowledgement			None		
Social Media Incident Response Procedure		X			
Social Media Process Manual	X	X			X
Anti-Virus and Anti-Malware Software Use	X	X	X	X	X
Reporting and Metrics	X		X	X	X

# ENHANCEMENT OPPORTUNITIES

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## Opportunity 1 – Social Media Use Guidelines and Awareness

### Relative Priority

Moderate

Deploy and Communicate Strategy

Sustain Leadership

Promote Culture

Manage Community

Refresh Content and Programming

Enforce Policies and Governance

Deploy Tools

Measure and Report

### Observation

Based on the framework of leading practices, the organization should set clear social media use guidelines that are easily accessible to all contractors and employees and should develop periodic internal training programs for employees to promote awareness of policies.

A risk point for CFX is uncontrolled social media use by CFX contractors and their employees that impacts CFX reputation and image. As a result, there is an opportunity to create a separate social media use guideline or policy specific to contractors.

In addition, CFX employees are trained on social media use policies during onboarding, however periodic refresh training or annual acknowledgement of social media use policies is not performed. Continuing education training is not provided annually for employees involved in managing social media for CFX.

Clear contractor policies/guidelines and employee awareness help prevent inappropriate social media use, which could present reputational risk to the organization.

### Recommendation

Management should develop a social media use guideline or policy for CFX contractors and subcontractors to help mitigate potential reputational risk. The following areas can be considered when developing social media use guidelines for contractors and their employees:

- Prohibiting use of CFX brand, name, logo including portrayal as employees of CFX, on social media platforms;
- Prohibiting photos/posting while on CFX premises, in CFX uniform, or while conducting CFX business;
- Usage of social media during crisis situations; and
- Frequently Asked Questions for contractor/subcontractor employees.

Additionally, management should incorporate an annual social media policy acknowledgement for all CFX employees and should implement periodic social media continuing education for employees that work directly with social media platforms and tools.



# ENHANCEMENT OPPORTUNITIES

## Opportunity 1 – Social Media Use Guidelines and Awareness (continued)

### Relative Priority

Moderate

Deploy and Communicate Strategy

Sustain Leadership

Promote Culture

Manage Community

Refresh Content and Programming

Enforce Policies and Governance

Deploy Tools

Measure and Report

### Management Response

Management concurs.

### Management Action Plan

Management will develop a social media use guideline or policy for CFX contractor and subcontractor employees. Management will also incorporate an annual social media policy acknowledgement for all CFX employees. Finally, management will implement periodic social media continuing education for employees that work directly with social media platforms and tools.

### Action Plan Owner / Due Date

Michelle Maikisch, Chief of Staff/Public Affairs Officer / June 30, 2021

# ENHANCEMENT OPPORTUNITIES

## Opportunity 2 – Password Policy and User Access Provisioning

### Relative Priority

Moderate

Deploy and Communicate Strategy

Sustain Leadership

Promote Culture

Manage Community

Refresh Content and Programming

Enforce Policies and Governance

Deploy Tools

Measure and Report

### Observation

As leading practice, social media password parameters and internal controls should comply with CFX IT Policy for overall IT security governance. CFX IT Policy states that passwords should contain at least 8 characters, including a combination of letters, numbers, and special characters, should be changed every 90 days, and should not be shared. In addition, passwords should not be stored in written form unless secured in an approved manner.

Internal Audit identified that password management practices for social media platforms and tools did not conform to leading practice and CFX IT Policy in the following ways:

1. Complexity and rotation;
2. Passwords for social media sites and tools are shared among users; and
3. Passwords are stored in written form in an Excel file.

Strong password controls help prevent security breaches and information loss that could damage reputation.

### Recommendation

Management should review social media platform and tool capabilities against CFX IT Policy to better align social media password controls with the organization's overall IT security strategy. Management should work with IT to align social media passwords to CFX IT Policy where possible.

Management should consider the following areas for improvement across all social media platforms and tools, where supported:

- Revise social media passwords and the ongoing password management process to conform with the complexity and password modification requirements defined in CFX's IT Policy;
- Eliminate the sharing of passwords by creating separate user credentials within Sprout Social and Hootsuite, where possible;
- Establish a standard approval and documentation process to provision and deprovision user access for social media employees and consultants;
- Implement use of a password vault to store and retrieve social media passwords; and
- As a leading practice, incorporate a dual-factor authentication to access social media sites and applications for all provisioned users.

# ENHANCEMENT OPPORTUNITIES

## Opportunity 2 – Password Policy and User Access Provisioning (continued)

### Relative Priority

Moderate

Deploy and Communicate Strategy

Sustain Leadership

Promote Culture

Manage Community

Refresh Content and Programming

Enforce Policies and Governance

Deploy Tools

Measure and Report

### Management Response

Management concurs.

### Management Action Plan

Management will review the recommendation and work collaboratively to develop an approach that improves social media password and user access provisioning controls and aligns with CFX and social media capabilities.

### Action Plan Owner / Due Date

Michelle Maikisch, Chief of Staff/Public Affairs Officer, and Jim Greer, Chief of Technology and Operations / January 31, 2021

# ENHANCEMENT OPPORTUNITIES

## Opportunity 3 – User Access Review

### Relative Priority

Moderate

Deploy and Communicate Strategy

Sustain Leadership

Promote Culture

Manage Community

Refresh Content and Programming

Enforce Policies and Governance

Deploy Tools

Measure and Report

### Observation

Based on the social media framework of leading practices, an organization should ensure that access is appropriately restricted to social media sites and a periodic review of user access should be performed by an employee that is independent of the user administration role.

Not performing periodic review of user access may increase the risk of inappropriate access to social media accounts, which presents a reputational risk to CFX due to the connection the accounts provide to the community.

### Recommendation

Upon completion of the management action plans to provision and deprovision user access in Sprout Social and Hootsuite or other third-party social media management tool, management should implement a periodic process to generate a user listing from the applications and perform an independent review of the user access list for appropriateness.

For other social media platforms not managed by a third-party social media management tool (such as Instagram), management should independently review users with access in conjunction with the third-party social media management tool user listing reviews.

### Management Response

Management concurs.

### Management Action Plan

Management will establish and document a periodic independent review of social media user access lists across all social media tools or platforms.

### Action Plan Owner / Due Date

Michelle Maikisch, Chief of Staff/Public Affairs Officer / December 31, 2020

# ENHANCEMENT OPPORTUNITIES

## Opportunity 4 – Procedural Documentation

### Relative Priority

Low

Deploy and Communicate Strategy

Sustain Leadership

Promote Culture

Manage Community

Refresh Content and Programming

Enforce Policies and Governance

Deploy Tools

Measure and Report

### Observation

CFX's social media practices follow the Social Media policies and Social Media Procedures Manual General Guide to outline the appropriate content to be administered on social media channels, which represents a leading practice. Opportunities exist to enhance the Social Media Procedures Manual General Guide to include additional procedures.

### Recommendation

Management can consider updating Social Media Procedures Manual General Guide to include the following:

- Process of approving social media within campaigns, including any exceptions;
- The appropriate platform to utilize for a campaign to reach an intended audience and goal;
- Creation of accounts, provisioning and de-provisioning of access, account backup and recovery, and brand management for social media platforms and tools;
- Appropriate use of mobile devices to perform social media job functions;
- Social media incident response, inclusive of information leaks and brand infringements;
- Validation that recovery methods for social media accounts are available to CFX if accounts are compromised;
- Compliance with relevant laws including internal governance compliance, legal holds on social media data storage, privacy laws and data protection compliance, and public disclosures and endorsements, as applicable to CFX's environment;
- IT and Legal department involvement in the overall social media process.

### Management Response

Management concurs.

### Management Action Plan

Management will consider the recommended topics as an update to the Social Media Procedures Manual.

### Action Plan Owner / Due Date

Angela Melton, Manager of Communications and Marketing / January 31, 2021

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