



Texas Department  
*of* Motor Vehicles

HELPING TEXANS GO. HELPING TEXAS GROW.

Social Media Governance Audit  
Audit 18-07

Internal Audit Division  
June 2018

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Social Media Governance, 18-07  
Executive Summary

BACKGROUND

Social media presents a variety of legal, security, privacy, human resources, and records management challenges not found with traditional information technology or communication channels.

The TxDMV uses social media to directly address customer questions and complaints, promote programs and initiatives, broadcast and receive public safety information during disasters, and share industry news. The Department maintains multiple social media accounts including three Facebook pages and three Twitter handles that target both the general public and industry-specific audiences such as motor carriers and law enforcement agencies.

TxDMV has more than 10,900 followers on Facebook and more than 4,214 followers on Twitter across all official accounts. The accounts are moderated by designated social media administrators within the Government Strategic & Communication, Motor Carrier and the Automobile Burglary and Theft Prevention Authority (ABTPA) Divisions.

RECOMMENDATIONS

The Internal Audit Division made three recommendations to develop guidance related to defining and promoting the Department's brand and message, creating privacy protocols for official social media accounts, and establishing a process to evaluate, approve, and track social media platforms.

RESULTS

The Texas Department of Motor Vehicles (TxDMV or Department) uses social media as a cost-effective method of reaching customers, reaching, 36,391 unique users at an average cost to the Department of \$0.16 per user between October 2017 to February 2018. Job descriptions of the Department's designated official social media account administrators include duties related to social media.

TxDMV information security, human resources, and record retention policies cover employees' activity and behavior on official social media outlets and TxDMV records management strategy for preventing disclosure of confidential information through social media. In addition, the Motor Carrier Division (MCD) and the Automobile Burglary and Theft Prevention Authority (ABTPA) have division policies for staff managing official social media accounts.

However, the Department has not developed an agency-wide social media strategy to align the use of social media throughout the various divisions. Each division has their own security and privacy configurations for their social media pages, and have different expectations on how to manage customer comments based on business objectives rather than Department strategy.

A central process for reviewing social media platform terms and conditions and their associated risk to the Department, and approving and tracking all official social media accounts has not been created. The decision to register new official TxDMV account is made by each division without required review from TxDMV Office of General Counsel, Information Security Section, or the Executive Office.

MANAGEMENT RESPONSE

Management agrees with all three recommendations and will develop a comprehensive social media plan to include branding, content, and privacy standards by August 31, 2019 and a process for evaluating social media platforms on which the Department operates its official social media accounts by August 31, 2019.

## Overall Conclusion and Executive Management Response

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### Maturity Assessment Rating

*2 - Repeatable but Intuitive Process Level:* The process is defined as having developed a process where several employees follow similar procedures, but the results may not be consistent. The process is not documented and has not been sufficiently evaluated to address risks.

Other possible ratings and definitions can be found in Appendix 1, under Maturity Assessment Rating Definition.

### Strengths

The Texas Department of Motor Vehicles (TxDMV or Department) is using social media as a cost effective method of reaching customers. From October 2017 to February 2018, the Department reached 36,391 unique users at an average cost of \$0.16 per user for the Department. The cost was associated to the time taken by staff to develop content and respond to customers. Staff that are responsible for social media have job descriptions that discuss their duties related to the administration of official social media accounts.

Additionally, the Automobile Burglary and Theft Prevention Authority (ABTPA) developed division policies for staff interacting on official social media accounts, including coordinating with Government and Strategic Communication Division (GSC) on major social media initiatives. Similarly, the Motor Carrier Division (MCD) developed a comprehensive policy that covered the following;

- which employees are designated to represent the division on social media and the process for posting, addressing communications goals and objectives of using social media,
- responding to or commenting in a personal capacity on official TxDMV posts or comments,
- the types of information the division will post,
- guidelines for crafting posts including tone,
- executive management review and approval prior to posting, and
- information accuracy and confidentiality, and use of copyrighted material.

Although no specific TxDMV wide policies have been developed for social media, the current Information Security Manual, Human Resource Manual, and Record Retention manual effectively extend to online social media activity and behavior when representing TxDMV through official social media outlets. The TxDMV Records Management Manual specifically outlines the Department's records management strategy for social media – prohibiting by policy the sharing of any information on social media that is not transitory or otherwise available as a record copy elsewhere.

### Improvements

The Department has not developed an agency-wide social media strategy, including defining security standards for administrators of official TxDMV social media accounts, to align the use of social media throughout the various divisions. Similarly, each division has set up their own security and privacy configurations, such as whether public comment is immediately visible to everyone, for their social media pages, and have different expectations on how to manage customer comments.

A central process for reviewing new platform terms and conditions, the associated risk to the Department, and approving and tracking all official social media accounts has not been formalized or

created. The decision to register an official TxDMV account on new social media platforms is made by each division without required review from the Office of General Counsel, Information Security Section, or the Executive Office.

Below are the audit results that further expand on these areas.

- Audit Result #1: A Department-wide social media strategy does not exist
  - Recommendation #1: The Department should develop guidance for employees administering official social media accounts and content to define and promote the Department's brand and message. (High)
  - Recommendation #2: The Department should develop privacy protocols for official social media accounts. (High)
- Audit Result #2: The Department does not have a process for evaluating, approving, and tracking all its official social media accounts
  - Recommendation #1: The Department should develop and document a process to evaluate, approve, track, and periodically review its continued presence on social media platforms including that terms, conditions, and platform account management configurations are acceptable to the Department. (High)

The detailed audit results can be found under the Audit Results section (begins on page 5).

## Executive Director's Management Response

Management appreciates the Internal Audit Division's work and recommendations to improve TxDMV's social media strategy. Management agrees with all three recommendations and will develop a comprehensive social media plan to include branding, content, and privacy standards, and a process for evaluating social media platforms on which the Department operates its official social media accounts by August 31, 2019.

## Observation

Currently, the Department tracks the number of followers, views, and comments on posts. Further analysis of available social media metrics is generally reserved for specific media campaigns. However, social media platforms such as Facebook and Twitter allow users and page administrators' access to historical activity information that can be leveraged to better measure and target the Department's impact of social media posts on customer interaction. As the Department matures its use of social media, the historical information should be used to measure the impact and cost associated to using and managing social media.

## Background

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Social media is defined as using Internet-based applications or broadcast capabilities to disseminate and/or collaborate on information. TxDMV has registered accounts on Facebook, Twitter, Instagram, YouTube, Periscope, and Google+, however, only Facebook and Twitter were considered during this audit as they are the primary social media platforms through which the Department engages customers.

The general public, news outlets, and other stakeholders are increasingly utilizing social media outlets as a primary information and communication source for a growing segment of the population. Through the appropriate use of social media, the Department has the opportunity to do the following:

- Increase traffic to websites and services
- Communicate with the public more directly and efficiently
- Increase outreach and brand recognition with stakeholders, and
- Turn negative complaints into positive experiences with timely customer service.

Social media presents a variety of legal, security, privacy, human resources, and records management challenges not found with traditional information technology or communication channels. With a growing dependency on social media as a primary communication channel, it is increasingly important to have a well-planned social media strategy to mitigate risks inherent in social media communications including a lack of control over engagements with customers, inadvertent posting of ill-advised content, and inconsistent internal processes or lack of governance.

TxDMV uses social media to directly address customer questions and complaints, promote programs and initiatives, broadcast and receive public safety information during disasters, and share industry news. The Department maintains multiple social media accounts including three Facebook pages and three Twitter handles targeted to both the general public and industry-specific audiences such as motor carriers and law enforcement agencies. The Department has over 10,900 followers on Facebook and over 4,214 followers on Twitter across all official accounts. Designated social media administrators within the GSC, MCD, and the ABTPA moderate the accounts.

GSC administers the Texas Department of Motor Vehicles Twitter (@TxDMV) and Facebook accounts, the MCD administers the TxDMV Motor Carrier Services Twitter account (@TxDMVGoTrucksGo) and Facebook page (@TxDMVMCD), and ABTPA administers the ABTPA Twitter (@TxAutoBurgTheft) and Texas Auto Burglary and Theft Prevention Authority Facebook page.

A core asset of social media is the ability to target and directly engage with a specific customer base. In the past six months, the GSC, MCD, and ABTPA divisions have made 50 Facebook posts and 178 Twitter posts to provide information on Department programs and disaster information, and engage customers to address questions and customer feedback. Those posts had the following reach to customers, as shown below in Table 1 and 2.

**Table1 – Facebook Post Impact Analysis**

Type of Post	Number of Posts	Lifetime Post Total Reach <sup>1</sup>	Lifetime Engaged Users <sup>2</sup>
ABTPA	26	4348	259
GSC	16	31410	1163
MCD	8	633	3
<b>Grand Total</b>	<b>50</b>	<b>36391</b>	<b>1425</b>

**Table 2 – Twitter Post Impact Analysis**

Type of Post	Number of Posts	Number of Impressions <sup>3</sup>	Number of Engagements <sup>4</sup>
GSC	170	295334	1993
MCD	8	1962	4
<b>Grand Total</b>	<b>178</b>	<b>297296</b>	<b>1997</b>

This audit was included in the fiscal year (FY) 2018 Audit Plan. The Internal Audit Division conducted this performance audit in accordance with Generally Accepted Government Auditing Standards and in conformance with the Internal Standards for the Professional Practice of Internal Auditing. These 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.

The audit was performed by Derrick Miller (Senior Auditor), Jacob Geray (Staff Auditor), and Sandra Menjivar-Suddeath (Internal Audit Director).

In accordance with the Texas Internal Auditing Act, this report is distributed to the Board of the Texas Department of Motor Vehicles, Governor’s Office of Budget, Planning, and Policy, Legislative Budget Board, State Auditor’s Office, and the Sunset Advisory Commission. The report was also distributed to the Department’s executive management team.

<sup>1</sup> The number of people who had a page's post enter their screen. (Unique Users)

<sup>2</sup> The number of unique people who engaged in certain ways with a page post, For example by commenting on, liking, sharing, or clicking upon particular elements of the post. (Unique Users)

<sup>3</sup> Impressions represent the number of times that a given Tweet has been viewed on the Twitter platform.

<sup>4</sup> Engagements represent the number of times that a given Tweet was engaged upon by a viewer. Engagements include, but are not limited to, Retweets, Replies, Clicks.

## Audit Results

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### A Department-wide social media strategy does not exist.

#### Condition

TxDMV uses social media for varying reasons that have not been strategically aligned to make sure Department goals and objectives are met. Each division has their own process to manage social media content and customer interaction and does not follow the same guidelines. For example, GSC relies on staff expertise and experience to manage social media content and customer interactions, without formal documented guidance, while ABTPA and MCD have policies in place for customer interaction. The policies developed by ABTPA and MCD vary in detail, with ABTPA policy addressing high-level division communication goals and the MCD policy describing staff processes for posting content.

Similarly, each division has set up their own security and privacy configurations for their social media pages, such as whether public comment is immediately visible to everyone, and have different expectations on how to manage customer comments.

#### Effect

TxDMV customer engagement through social media has remained relatively flat, with a net increase of five followers, and varied significantly between divisions from October 2017 to February 2018. GSC reached 31,410 customers while ABTPA reached 4,348 and MCD reached 633 customers through its Facebook posts. Similarly, only 259 ABTPA and three MCD customers were actively engaged (e.g., commented, reacted, or shared postings) while GSC had 1,162 customers actively engage with Facebook posts in that same time period.

The varying policies could allow for inappropriate language or sensitive information to be posted by the public on the Department's social media. Currently some TxDMV social media pages allow commenting to be immediately viewable by the public without review or approval by the Department. Furthermore, the different social media platforms' available security configuration options may not align with TxDMV information security policy.

#### Cause

The Department has not developed an agency-wide social media strategy, including defined security standards for administrators of official TxDMV social media accounts, to align the use of social media throughout the various divisions.

#### Criteria

A well-planned social media strategy mitigates risks and provides the agency a roadmap toward continued growth and success while allowing divisions to achieve their own business goals using social media.

#### Evidence

- Divisions have differing privacy and security configurations across divisions and platforms.
  - GSC disabled the ability to send private messages because Facebook users have sent personally identifiable and vehicle identifiable information covered by the Driver's Privacy Protection Act. GSC disabled the ability to rate and review because the majority of reviews

- reflected experiences with the Texas Department of Public Safety and local county tax assessor-collectors, rather than with TxDMV.
  - MCD does not review comments before they are posted. MCD does allow followers to send private messages and rate and review the division.
  - ABTPA periodically reviews comments after they have been posted, but does not currently review comments before they are publicly visible.
  - GSC's two social media administrators' Facebook roles are associated with their personal Facebook accounts as required by Facebook terms and conditions, while MCD's and ABTPA's social media administrators' Facebook roles are associated with one Facebook account each, created specifically to manage their Facebook pages.
- Divisions have not aligned the purpose and use of social media to the Department's overall strategy.
  - GSC uses social media to promote Department services, media campaigns, and directly answer customer comments and complaints. GSC relies on staff expertise and experience, without formal documented guidance, to manage social media content and customer interactions.
  - ABTPA's uses social media to promote ABTPA's work and grantee's work to combat automobile burglary and theft. ABTPA's operational manual outlines their communication goals for social media.
  - MCD uses social media to engage customers for exchanging information, broadcasting immediate information, and correct misinformation. MCD's divisional social media policy addresses social media communication goals, approved content, staff's social media management responsibilities, and guidelines for tone, accuracy, and confidentiality.

## Recommendations

The Internal Audit Division recommends the following:

- 1.1 The Department should develop guidance for employees administering official social media accounts and content to define and promote the Department's brand and message. (High)
- 1.2 The Department should develop privacy protocols for official social media accounts. (High)

## Management's Response and Action Plan

### Management Response & Action Plan 1.1

Management agrees with the recommendation and will develop branding and content standards and messaging guidelines for Department social media accounts.

**Management Action Plan Owner(s):** Wendy Cook, Government and Strategic Communications Division Information Specialist

**Anticipated Completion Date:** August 31, 2019

### Management Response & Action Plan 1.2

Management agrees with the recommendation and will develop privacy protocols for Department social media accounts.

**Management Action Plan Owner(s):** Wendy Cook, Government and Strategic Communications  
Division Information Specialist

**Anticipated Completion Date:** August 31, 2019

## The Department does not have a process for evaluating, approving, and tracking all its official social media accounts

### Condition

The decision to register an official TxDMV account on new social media platforms is made by each division. It is up to the division to track the platforms, pages, and usernames which they have registered on behalf of the Department. Review and approval by key divisions and functions, such as the Office of General Counsel, Information Technology Services Division - Information Security Section, or Executive Office are not required.

### Effect

The Department may not be aware of its official representation, current or former staff maintaining access to official accounts on various social media platforms. The risk that an unapproved account is created and operated without oversight from TxDMV management is also increased. Without appropriate oversight, social media sites can be used by dissatisfied customers, employees or individuals with an issue against an enterprise to disseminate misinformation and negative information.

The TxDMV may also be accepting legal and information security risks it is unaware of by agreeing to user terms and conditions of social media platforms without a review of said terms and conditions from the Office of General Counsel or the Information Security Section.

### Cause

A central process for reviewing new platform terms and conditions and their associated risk to the Department, and approving and tracking all official social media accounts has not been formalized or created.

### Criteria

A formal process for approving and tracking official social media accounts helps agencies to address how selected social media platforms and usage continue to align with the Department's mission, address program goals and objectives, and assign roles and responsibilities.

### Evidence

- The Department currently has 10 registered social media accounts, including Twitter, Facebook, and YouTube accounts. None of the accounts or platforms were reviewed by the Office of General Counsel or the Information Security Section to ensure terms were acceptable to the Department.
  - The Facebook and Twitter platforms include tools which allows multiple users to be assigned administrator roles while maintaining their own unique login and passwords.
  - The MCD Facebook administrators share a single login and password.
  - GSC's two social media administrators' Facebook roles are associated with their personal Facebook accounts as required by Facebook terms and conditions.
  - MCD's and ABTPA's social media administrators' Facebook roles are associated with one Facebook account each, created specifically to manage their Facebook pages. The Facebook accounts associated to these pages may not be in agreement with Facebook's terms and conditions.

- GSC maintains a list of the accounts usernames, and staff assigned administrator roles, while MCD and ABTPA were able to verbally provide this information as needed.
- Divisions have not historically sought Executive approval before registering additional social media accounts. Divisions may inform the Executive Office before registering new social media accounts.

## Recommendation

The Internal Audit Division recommends the following:

- 2.1 The Department should develop and document a process to evaluate, approve, track, and periodically review its continued presence on social media platforms including that terms, conditions, and platform account management configurations are acceptable to the Department. (High)

## Management's Response and Action Plan

### Management Response & Action Plan 2.1

Management agrees with the recommendation and will develop a comprehensive social media management plan to include periodic review and evaluation of Department presence on social media platforms.

**Management Action Plan Owner(s):** Wendy Cook, Government and Strategic Communications Division Information Specialist

**Anticipated Completion Date:** August 31, 2019

## Appendix 1: Objectives, Scope, Methodology and Maturity Assessment

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### Objectives

To determine whether the Department has established a social media governance structure designed to protect the Department's brand.

### Scope and Methodology

The scope of the audit included official TxDMV Facebook and Twitter accounts, and the Department's social media governance and management policies and procedures as of September 1, 2017.

IAD interviewed designated social media account administrators in the Government and Strategic Communications Division (GSC), Motor Carrier Division (MCD), and Automobile Burglary and Theft Prevention Authority Division (ABTPA), and GSC staff responsible for developing the strategic communications plans for TxDMV projects and initiatives to understand the governance processes and structure over the Department's official social media usage. IAD interviewed other Department personnel including the Human Resources Division Director, General Counsel, Information Security Officer, and TxDMV Records Manager to determine how policies apply to the Department personnel representing TxDMV on official social media accounts.

IAD also performed a cost-effectiveness analysis of the Department's use of social media based on historical social media activity data and metrics from Facebook and Twitter and the time and salary resources the Department dedicates to manage its social media presence.

Information and documents reviewed in the audit included the following:

- TxDMV Strategic Communications Publications Inventory 2017
- TxDMV Human Resources Manual, November 2017
- TxDMV Form 1836 Policy and Benefit Notification for New Employees, January 2018
- TxDMV Form 1836B Policy Notification and Acknowledgement for Employees, November 2017
- TxDMV job descriptions and salaries for designated social media administrator staff
- TxDMV Information Security Manual, May 2017
- TxDMV Form 1828 Information Resources Security Compliance and Confidentiality Agreement, September 2017
- TxDMV Records Retention Schedule, September 2017
- TxDMV Records Management Manual, Version 1.0, February 2018
- TxDMV Motor Carrier Division Online Social Media Policy
- TxDMV Auto Burglary and Theft Prevention Authority Social Media Policy
- Texas Department of Information Resources Social Media Resource Guide, February 2013
- ISACA's Social Media Audit/Assurance Program
- Facebook's page roles definitions and requirements
- Twitter's Terms and Conditions

- Facebook Page Insights activity metrics
- Twitter Analytics activity metrics

## Maturity Assessment Rating Definitions

The maturity assessment rating and information were derived from the Control Objectives of Information and Related Technologies (COBIT) 5 IT Governance Framework and Maturity Model and the Enterprise Risk Management (ERM) Maturity Model. The model was adapted for the TxDMV assurance audit purposes and does not provide a guarantee against reporting misstatement and reliability, non-compliance, or operational impacts. Below are the definitions for each rating level.

- 0 - A rating level of 0, also known as a non-existent process level, is defined as no process has been defined or used.
- 1 - A rating level of 1, also known as an initial and ad-hoc process level, is defined as a standardized process has not been developed and an ad hoc approach is being used when issues arise.
- 2 - A rating level of a 2, also known as repeatable but intuitive process level, is defined as having developed a process where several employees follow similar procedures, but the results may not be consistent. The process is not documented and has not been sufficiently evaluated to address risks.
- 3 - A rating level of a 3, also known as a defined process level, is defined as having a standardized, documented, communicated, and followed process. The process, however, may not detect any deviation due to the process not being sufficiently evaluated to address risks.
- 4 - A rating level of a 4, also known as a managed and measurable process level, is defined as having a standardized, documented, communicated, and followed process. Management monitors and measures compliance with process. Process is under constant improvement and provides good practice. The use of information technology would help automate workflow and improve quality and effectiveness.
- 5 - A rating level of a 5, also known as refined level, is defined as having a good process (e.g., standardized, documented, communicated, and followed process) as a result of continuous improvement and the use of technology. Information technology is used in an integrated way to automate workflow and to improve quality and effectiveness.