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**Audit of Social Media  
Governance**

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**AYCHA SAWA**  
City Comptroller

**CHARLES ROEDEL**  
Audit Manager

City of Milwaukee, Wisconsin

September 2021

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**Aycha Sawa, CPA, CIA**

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Special Deputy Comptroller

September 21, 2021

Honorable Tom Barrett, Mayor  
The Members of the Common Council  
City of Milwaukee

Dear Mayor and Council Members:

The attached report summarizes the results of the Audit of Social Media Governance. The scope of the audit included all City departments' policies, procedures, processes, and postings related to social media with emphasis on conformity to the City of Milwaukee Social Media Policy. The time period included in the audit was January to June of 2020. The focus of the audit was to assess the City's internal control over user access to social media accounts, appropriateness of use, and monitoring of social media activity.

The audit objectives were as follows:

1. Evaluate whether the City of Milwaukee Social Media Policy is in conformance with best practice standards;
2. Assess whether City departments adhere to the City of Milwaukee Social Media Policy;
3. Determine if user access management controls are in place and functioning adequately; and,
4. Assess whether the controls over the monitoring of social media activity are in place and functioning adequately.

The audit concluded that the City's social media governance is at an early stage of maturity. An opportunity exists for elected officials and departmental leaders to provide input to update the policy, including definition of ownership and responsibilities for social media governance. Additionally, an opportunity exists to progress towards uniform user access, monitoring, record retention, and training procedures throughout the City.

Audit findings are discussed in the Audit Conclusions and Recommendations section of this report and are followed by ITMD and MPD management's response.

Sincerely,

A handwritten signature in black ink that reads "Charles Roedel".

Charles Roedel, CPA, CIA

Audit Manager

CRR:bjk



# Audit Report Highlights

## Audit of Social Media Governance

### Why We Did This Audit

Social media plays an increasing role in residents' daily lives. It is used by City departments and elected officials to communicate important information to residents.

Appropriateness of usage affects resident trust and satisfaction with City government.

### Objectives

The objectives of the audit were to compare the policy to best practice standards, assess adherence to the policy, and determine if controls over user access and monitoring were in place and functioning adequately.

### Background

The City of Milwaukee Social Media Policy was developed in 2011 and can be found on the City's website. Many City departments and elected officials communicate through platforms such as Facebook and Twitter to engage and share important information with residents.

### Overview

The audit concluded that the City's social media governance is at an **early stage of maturity**. The Social Media Policy was updated in 2011. Departmental leader and elected official awareness and compliance with the policy is inconsistent. Additionally, user access, monitoring, record retention, and training procedures are inconsistent Citywide.

### Opportunities for Improvement

Elected officials and departmental leaders should provide input to update the policy. The policy update should:

- Define the owner or owners of social media governance;
- Explicitly prohibit misinformation and misleading information; and,
- Define the differentiation of elected officials' City account, campaign account, and personal account, and related expectations for City account use.

Additionally, the City should progress towards uniform user access, monitoring, record retention, and training procedures Citywide.

**Detailed findings and related recommendations can be found in the Audit Conclusions and Recommendations section of this report.**

## **I. Audit Scope, Objectives, and Methodology**

### *Scope*

The scope of the audit included all City departments' policies, procedures, processes, and postings related to social media with emphasis on conformity to the City of Milwaukee Social Media Policy. The time period included in the audit was January to June of 2020. The focus of the audit was to assess the City's internal control over user access to social media accounts, appropriateness of use, and monitoring of social media activity.

### *Objectives*

The objectives of the audit were as follows:

1. Evaluate whether the City's Social Media Policy is in conformance with best practice standards;
2. Assess whether City departments adhere to the City's Social Media Policy;
3. Determine if user access management controls are in place and functioning adequately; and,
4. Assess whether the controls over the monitoring of social media activity are in place and functioning adequately.

The audit was conducted 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 the findings and conclusions based on the audit objectives. Internal Audit believes that the evidence obtained provides a reasonable basis for the audit's findings and conclusions based on the audit objectives.

### *Methodology*

Audit methodology included developing an understanding of the processes and controls over social media governance. The audit program was developed using criteria outlined by COSO and ISACA. These present a methodology for performing audits in accordance with professional standards as presented in Government Auditing Standards (also known as the "Yellow Book"), which was used as a reference and program development guide for the planning of this audit.

The audit procedures developed to evaluate the processes and controls included surveys as walkthroughs, inspection of relevant control documentation, review of internal policies, procedures, and guidelines, and the testing of controls.

## **II. Organization and Fiscal Impact**

Social media plays an increasing role in residents' daily lives. It is used by City departments and elected officials to communicate important information to residents. Appropriateness of usage affects resident trust and satisfaction with City government.

The City of Milwaukee Social Media Policy was developed in 2011 and can be found on the City's website. Many City departments and elected officials communicate through platforms such as Facebook and Twitter to engage with the community and share important information with residents.

## **III. Audit Conclusions and Recommendations**

The audit concluded that the City's social media governance is at an early stage of maturity. Awareness, understanding, and compliance with the City of Milwaukee Social Media Policy is inconsistent among departmental leaders and elected officials. Additionally, user access, monitoring, record retention, and training procedures are inconsistent Citywide.

### **Social Media Governance Ownership and Responsibilities**

The Social Media Policy does not identify ownership of social media governance. Control design and execution of control responsibilities are decentralized, taking place at the departmental and elected official levels.

Finding: Ownership and responsibilities of social media governance are not defined.

Risk: Lack of oversight due to lack of ownership. *Risk Rating: High*

Recommendation 1: Ownership and responsibilities of social media governance should be identified in the Social Media Policy. *Implementation Owner: ITMD*

### **Social Media Policy Awareness**

Departmental and elected official survey results showed a lack of awareness of the Social Media Policy. Many respondents were not aware that there was a policy. Additionally, other respondents who were aware of the policy were not part of its creation.

Finding: The Social Media Policy is not widely known to departmental leaders and elected officials.

Risk: Users may not comply with the Social Media Policy because they are not aware any policy even exists. Additionally, City stakeholders may not agree with the policy. *Risk Rating: High*

Recommendation 2: The Social Media Policy should be updated with opportunity for input from all departments and elected officials. *Implementation Owner: ITMD*

### **Social Media Policy Non-Compliance**

Internal Audit tested 50 social media postings across City departments and elected officials for compliance with the Social Media Policy. Internal Audit found that MPD social media postings selected as part of the sample were not in compliance with the policy, which prescribes “[d]epartments must ensure that their employees constantly monitor material posted to social media sites to replace stale, outdated, and/or incorrect information”<sup>1</sup> and “[e]mployees representing the City of Milwaukee on social media sites must act responsibly in the posting of material and in their online demeanor... they should always exercise good judgment regarding the content.”<sup>2</sup>

Finding: MPD maintained tweets with misinformation in violation of the Social Media Policy. Additionally, MPD tweeted statistics that falsely implied causation in violation of the Social Media Policy.

Risk: Loss of trust and potential for misinformation or outdated information misleading Milwaukee residents. *Risk Rating: High*

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<sup>1</sup> Department of Administration Information and Technology Management Division. *City of Milwaukee Social Media Policy*. City of Milwaukee. 2011. <https://city.milwaukee.gov/SocialMediaPolicy>

<sup>2</sup> Ibid.

Recommendation 3: The Social Media Policy should explicitly prohibit misinformation and misleading information. *Implementation Owner: ITMD*

Further, MPD should review the Social Media policy and comply with the policy. *Implementation Owner: MPD*

### **Social Media Management**

Departmental and elected official survey results showed inconsistent procedures for user access reviews, training, monitoring, and record retention.

Finding: Management of user access, monitoring, record retention, and training procedures are inconsistent Citywide.

Risk: Inconsistent execution of Social Media management responsibilities. *Risk Rating: Medium*

Recommendation 4: Uniform user access, monitoring, record retention, and training procedures should be developed and implemented Citywide. Stakeholders should consider whether the increasing prevalence of social media warrants investment in social media management software. *Implementation Owner: ITMD*

### **Elected Official Account Differentiation**

Elected officials should have clear differentiation between City accounts, campaign accounts, and other personal accounts.

Finding: Differentiation between elected officials' City accounts, campaign accounts, and other personal accounts is often unclear.

Risk: Potential for campaign and other personal usage being interpreted as coming from City account. *Risk Rating: Low*

Recommendation 5: An updated Social Media Policy should address the need to differentiate the campaign, City, and personal accounts of elected officials. *Implementation Owner: ITMD*



**Aycha Sawa, CPA, CIA**  
Comptroller

**Joshua Benson**  
Deputy Comptroller

**Toni Biscobing**  
Special Deputy Comptroller

**Richard Bare, CPA**  
Special Deputy Comptroller

September 21, 2021

Honorable Tom Barrett, Mayor  
The Members of the Common Council  
City of Milwaukee

Dear Mayor and Council Members:

With this letter, the Office of the City Comptroller acknowledges receipt of the preceding report, which communicates the results of the Audit of Social Media Governance. I have read the report and support its conclusions. Implementation of the stated recommendations will help improve City processes.

As the City Comptroller, I was not involved in any portion of the work conducted in connection with the audit. At all times, the Internal Audit Division worked autonomously in order to maintain the integrity, objectivity, and independence of the audit, both in fact and in appearance.

Sincerely,

A handwritten signature in black ink, appearing to read "Aycha Sawa".

Aycha Sawa, CPA, CIA  
Comptroller



Department of Administration  
Information and Technology  
Management Division

Tom Barrett  
Mayor

Sharon D. Robinson  
Administration Director

David A. Henke  
Chief Information Officer

September 1, 2021

Charles Roedel  
Audit Manager  
City Comptroller's Office  
City Hall, Room 404  
Milwaukee, WI 53202

RE: Response to Social Media Governance Internal Audit

Dear Mr. Roedel:

The Department of Administration - Information and Technology Management Division (ITMD) appreciates the opportunity to work with the Comptroller's office regarding the subject audit and acknowledges receipt of the draft observations dated August 26, 2021.

Detailed responses to each observation are provided below. Each response includes brief feedback to the observation, a status for those where remediation actions are planned, and an anticipated status update date for those with remediation actions.

**Finding 1:** Ownership and responsibilities of social media governance are not defined.

**Recommendation 1:** Ownership and responsibilities of social media governance should be identified in the Social Media Policy.

ITMD agrees the Social Media Policy should explicitly define the ownership and responsibilities of social media governance. The policy, in consultation with various departments and elected officials, can be updated with revised language to reflect this proposed change. The Social Media Policy is anticipated to be updated in conjunction with the deployment of a new social media management platform that will provide additional features and functionality. The new platform is anticipated to be available by Q3 of 2022, with an updated Social Media Policy adopted in Q4 of 2022 to reflect the available tools. Updates to the implementation status can be provided at that time.

**Finding 2:** The Social Media Policy is not widely known to departmental leaders and elected officials.

**Recommendation 2:** The Social Media Policy should be updated with opportunity for input from all departments and elected officials.

ITMD agrees the Social Media Policy should be updated to reflect the several recommendations of the audit, the incorporation of new social media management tools, and to reflect current technology. The policy, in consultation with various departments and elected officials, can be updated in conjunction with the deployment of a new social media management platform that will provide additional features and functionality. The new platform is anticipated to be available by Q3 of 2022, with an updated Social Media Policy adopted in Q4 of 2022 to reflect the available tools. Updates to the implementation status can be provided at that time.

**Finding 3:** A City department maintained tweets with misinformation in violation of the Social Media Policy. Additionally, this City department tweeted statistics that falsely implied causation in violation of the Social Media Policy.

**Recommendation 3:** The Social Media Policy should explicitly prohibit misinformation and misleading information.

As noted in the audit report, the current Social Media Policy currently states, “[d]epartments must ensure that their employees constantly monitor material posted to social media sites to replace stale, outdated, and/or incorrect information” and “[e]mployees representing the City of Milwaukee on social media sites must act responsibly in the posting of material and in their online demeanor... they should always exercise good judgment regarding the content.”

ITMD agrees the Social Media Policy should explicitly prohibit misinformation and misleading information. The policy, in consultation with various departments and elected officials, can be updated with revised language to reflect these terms. The Social Media Policy is anticipated to be updated in conjunction with the deployment of a new social media management platform that will provide additional features and functionality. The new platform is anticipated to be available by Q3 of 2022, with an updated Social Media Policy adopted in Q4 of 2022 to reflect the available tools. Updates to the implementation status can be provided at that time.

**Finding:** Management of user access, monitoring, record retention, and training procedures are inconsistent Citywide.

**Recommendation 4:** Uniform user access, monitoring, record retention, and training procedures should be developed and implemented Citywide. Stakeholders should consider whether the increasing prevalence of social media warrants investment in social media management software.

ITMD agrees that the use of a common social media management platform throughout the City is needed to provide uniform user access, monitoring, and record retention. ITMD has previously requested and received funding allocated for the procurement of a social media management tool. An RFP has been developed and will be issued through the purchasing division in the next several weeks. It is anticipated that the RFP and implementation process may take up to 9 months, with full implementation and

remediation of this finding in Q3 of 2022. Updates to the implementation status can be provided at that time.

**Finding 5:** Differentiation between elected officials' City accounts, campaign accounts, and other personal accounts is often unclear.

**Recommendation 5:** An updated Social Media Policy should address the need to differentiate the campaign, City, and personal accounts of elected officials.

ITMD believes the differentiation of use of City resources for personal and campaign use is much broader than just social media. Nonetheless, reference to differentiating accounts can be made in a revised Social Media Policy. Elected officials will be directed to contact the Election Commission with specific questions or concerns regarding applicable City ordinances or state statutes. This will be incorporated as part of a revised Social Media Policy anticipated for adoption in Q4 of 2022. Updates to the implementation status can be provided at that time.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. A. Henke', written in a cursive style.

David A. Henke  
Chief Information Officer



**Milwaukee Police Department**  
Police Administration Building  
749 West State Street  
Milwaukee, Wisconsin 53233  
<http://www.milwaukee.gov/police>

August 30, 2021

**Jeffrey B. Norman**  
Acting Chief of Police

(414) 935-7200

Mr. Charlie Roedel  
Audit Manager  
City of Milwaukee  
Office of the Comptroller  
200 E. Wells St., Room 404  
Milwaukee, WI

The Milwaukee Police Department is in receipt of your August 26, 2021 request for a Management Response as it relates to the Audit of Social Media Governance. You highlighted two sets of "Tweets" related to an allegation of a Molotov cocktail and a statement related to the reduction of officers and increase in homicides.

As the Acting Chief of the Milwaukee Police Department, I do not condone either communication. I agree that they are misleading, irresponsible and poorly reflect on not only the Milwaukee Police Department but also the entire City of Milwaukee. Those social media communications were issued under the direction of Chief Alfonso Morales. Put simply, those Tweets are unacceptable.

Since those communications were issued, there has been considerable turnover, including at the Chief of Police position and two of the three members of the Public Information Office. My current Public Information Office team, as is evidenced by their social media efforts since I was sworn into my position as Acting Chief, focuses on positive and productive communication and has consistently fallen well-within the guidelines of the Social Media Policy. Under my direction, the Milwaukee Police Department takes great pride in its broad social media reach and the positive outcomes that it can facilitate.

I wholly agree with Recommendation 3: "The Social Media Policy should explicitly prohibit misinformation and misleading information. MPD should review the Social Media policy and comply with the policy." My Chief of Staff, Nick DeSiato, oversees the Public Information Office and is responsible for the implementation of this recommendation. In response to this inquiry, every member of the Public Information Office was resent the Social Media Policy and instructed to continue to strictly comply to its terms.

Regards,



JEFFREY NORMAN  
ACTING CHIEF OF POLICE