



Social Media Audit

January 17, 2025

Mayor

Mattie Parker

City of Fort Worth Department of Internal Audit

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The Social Media Audit was conducted as part of the Department of Internal Audit's Fiscal Year 2024 Annual Audit Plan.

Audit Objectives

The objectives of this audit were to:

- assess governance and oversight of the City's social media strategy and platforms against best practices and standards; and,
- evaluate whether controls over user access and performance monitoring and reporting are in place and functioning as intended.

Audit Scope

Our audit included a review of CFW social media accounts, policies and procedures, and related data for the period of October 1, 2022 through September 30, 2023. Activity beyond this period was reviewed as deemed necessary.

Opportunities for Improvement

Discontinued practice of linking personal email addresses to City social media accounts

Updated Social Media Policy

Retaining all documents that are a part of binding contracts

Executive Summary

As part of the Fiscal Year 2024 Annual Audit Plan, the Department of Internal Audit conducted a Social Media Audit. Management of social media is overseen by the Communications and Public Engagement Department, which also provides social media guidance to City of Fort Worth (CFW) departments.

The CFW utilizes various social media platforms to interact with residents regarding official City business. The Department of Internal Audit observed a uniform messaging style, and concluded that messaging regarding City initiatives and departmental operations was consistent across CFW social media sites (i.e., same wording and content). However, our review of the City's 81 social media user accounts identified 43 accounts directly linked to an employee's personal email address. CFW regulations prohibit the use of personal email addresses for City business.

The City's Social Media Policy had not been updated since its initial adoption in 2011. Also, at least one department was using a more recent policy that had not been approved/adopted.

We determined that some procurement documents related to the City's purchase of social media archival software (PageFreezer) were not included in contract documentation filed within the City Secretary's Office, nor were they available within the procuring department, Communications and Public Engagement.

Although not required by City policy, we determined that some departments (e.g., Library and Public Events) provided social media activity reports to their respective departmental and executive City management, on at least a monthly basis. Test results show the Communications and Public Engagement Department provided social media activity reports on a weekly basis.

Our audit findings are discussed in further detail within the [Detailed Audit Findings](#) section of this report.

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Background

Social media refers to any digital, web-based application used to create, share, and interact with content generated by other users. Social media platforms typically allow users to create profiles; share text, images, videos, and other multimedia content; and engage with others through comments, likes, shares, and messages. Popular social media platforms include Facebook, Twitter/X, Instagram, YouTube, TikTok, LinkedIn, and others.

As of the end of our audit fieldwork, a total of 72 social media sites were used by 14 departments within the City of Fort Worth (CFW). These social media sites, which can be accessed from the City’s public website, were used to distribute information regarding City operations and to promote City services, programs, and initiatives.

Management of the City’s social media sites is decentralized, with departments being responsible for approving posts to their respective platforms, and monitoring activity/interaction with citizens. Although not involved in the day-to-day management of specific departmental sites, the Communications and Public Engagement Department is involved in removing posts, as deemed necessary. The Communications and Public Engagement Department also provides overall social media guidance and assistance.

Social media platforms used by the City, during our audit period, are listed in the following table. The City’s use of these platforms allowed for communication with the public faster than via traditional methods (e.g., flyers)

Number of Social Media Sites by Department								
Department	Facebook	Twitter/X	Instagram	YouTube	NextDoor	TikTok	LinkedIn	Total
Code Compliance	2	1	1	1	-	-	-	5
Communications and Public Engagement	2	1	1	1	1	-	-	6
Economic Development	1	1	-	-	-	-	1	3
Environmental Services	1	1	-	-	-	-	-	2
Fire	1	1	1	-	1	-	-	4
Library	1	1	1	1	-	-	-	4
Mayor and City Council	1	1	1	-	-	-	-	3
Neighborhood Services	1	-	-	1	-	-	-	2
Office of Emergency Management	-	1	1	-	-	-	-	2
Office of the Police Oversight Monitor	1	-	-	-	-	-	-	1
Park and Recreation	22	1	-	-	-	-	-	23
Police	1	1	1	1	1	1	-	6
Public Events	2	2	2	-	-	-	-	6
Water	2	1	1	1	-	-	-	5
Grand Total	38	13	10	6	3	1	1	72

Source: Communications and Public Engagement Department

NOTE: This table does not include Facebook, Twitter/X, and Instagram social media accounts related specifically to golf. These specific accounts are not listed as a *Social Link* on the City’s website.



During the audit period, the State of Texas passed Senate Bill (SB) 1893 prohibiting the use of TikTok and certain other social media applications and services on governmental devices. The Bill specifically requires cities to adopt a policy prohibiting the installation of TikTok or other covered applications, and requiring the removal of those applications from governmental devices other than applications used to provide for law enforcement or develop/implement information security measures. Although the Bill went into effect once signed by the governor on June 14, 2023, cities were not required to adopt a policy until the Texas Department of Information Resources and the Texas Department of Public Safety jointly developed a model policy. The model policy was released on September 16, 2024.

The CFW has updated its software policy to address the requirements of SB 1893, and was in the process of finalizing that policy update as of our audit fieldwork.



Objectives

The objectives of this audit were to:

- assess governance and oversight of the City’s social media strategy and platforms against best practices and standards; and,
- evaluate whether controls over user access and performance monitoring and reporting are in place and functioning as intended.

Scope

Our audit covered the period of October 1, 2022 through September 30, 2023. Activity beyond this period was reviewed as deemed necessary.

Methodology

To achieve the audit objectives, the Department of Internal Audit performed the following:

- interviewed Communications and Public Engagement, Code Compliance, Economic Development, Environmental Services, Fire, Library, Neighborhood Services, Office of Emergency Management, Office of the Police Oversight Monitor, Park and Recreation, Public Events, and Water Department staff;
- reviewed social media usernames and passwords for Facebook, Twitter/X, Instagram, and YouTube platforms;
- reviewed samples of social media posts from different CFW platforms;
- reviewed written CFW policies, procedures, and training materials relating to social media;
- compared CFW policies to Texas Association of Municipal Information Officers (TAMIO) and the United States Department of the Interior social media policies;
- surveyed departments that used social media platforms to promote City programs, services, etc.; and,
- evaluated internal controls related to managing social media platforms.

We conducted this performance audit in accordance with generally accepted government auditing standards, except for peer review¹. 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.

¹ Government auditing standards require audit organizations to undergo an external peer review every three years. A peer review was due in June 2024, but is not planned until FY2025, for the three-year period ending December 31, 2023.



Audit Results

The Department of Internal Audit reviewed posts of several City of Fort Worth (CFW) departmental social media sites for the audit period, and observed a uniform messaging style as required by the Communications and Public Engagement (CPE) Department. We also determined that messaging regarding City initiatives and departmental operations was consistent across CFW social media sites (i.e., same wording and content). Internal Audit compared CFW social media policies to policies of the United States Department of Interior and practices of TAMIO, and did not identify any reportable inconsistencies.

Internal Audit was provided a listing of 81 CFW social media user accounts associated with social media sites listed on the CFW's public website. Our review determined that 43 of the 81 accounts were linked to an employee's personal email address.

The CFW's use of social media has increased since the official CFW social media policy was adopted in 2011. Our review of the 2011 policy noted no overall strategy. However, a 2023 draft social media policy contains goals and strategies for the use of social media platforms currently in use (e.g., Facebook, Twitter/X, Instagram, YouTube, LinkedIn, and NextDoor), and describes the strategic use of those platforms. At least one department was issued the Social Media Policy that was drafted in FY2023. However, that policy had not been adopted by the CFW.

The City's current Social Media Policy, which was adopted in 2011, had not been updated. Interviews with social media administrators within City departments revealed that some departments were not aware that a social media policy existed. CPE staff stated that in addition to being unaware that the 2011 policy was published on the CFW intranet, they were unaware that the 2011 policy was included in the FY2015 citywide Communications Handbook.

In October 2023, the CPE Department purchased social media archiving software, PageFreezer, to capture and archive social media site activity. We concluded that some procurement documents relating to the purchase were not on file within the City Secretary's Office, nor were they retained by the CPE Department.

Although City departments are not required to provide reports of social media activity, we determined that a few departments (e.g., Communications and Public Engagement, Library, and Public Events) regularly report social media site activity to their departmental management or assigned Assistant City Manager.



Overall Risk Evaluation

High	Medium	Low
Personal email addresses linked to City's social media accounts		
	Outdated CFW Social Media policies	
		Non-retention of the entire contract (e.g., initial contract, amendments, and exhibits, etc.)



Detailed Audit Findings

1. Some social media user accounts are linked to employees' personal email addresses.

The Department of Internal Audit reviewed a CPE listing of 81 CFW social media user accounts, and tested the accuracy by verifying associated email addresses and passwords. Of the 81 accounts, we determined that 26 accounts were directly linked to generic CFW email addresses (e.g., fortworthdept@fortworthtexas.gov). Of the remaining 55 accounts, 53 were either linked to a personal email address (e.g., jdoe@gmail.com) or specific CFW employee email address (jdoe@fortworthtexas.gov), and two (2) accounts did not have an associated email address or password listed.

- 26 accounts - directly linked to generic CFW email addresses
 - Library – 18
 - Fire – 5
 - Communications and Public Engagement – 2
 - Water – 1
- 43 accounts - directly linked to personal email addresses
 - Park and Recreation – 21
 - Public Events – 6
 - Code Compliance – 5
 - Water – 5
 - Environmental Services – 2
 - Neighborhood Services – 2
 - Communications and Public Engagement – 1
 - Economic Development – 1
- 10 accounts - directly linked to specific CFW employee email addresses
 - Police – 5
 - Office of the Police Oversight Monitor – 3
 - Economic Development – 1
 - Park and Recreation – 1
- Two accounts - no associated email addresses identified
 - Communications and Public Engagement – 2

The use of personal email addresses to conduct City business increases the potential for exposing sensitive information, as well as increased risks of data breaches. In addition, issues with transferring ownership of social media accounts when employees leave the City could occur.

While the City's Social Media Policy was outdated as noted in Finding #2, Section 7.4 of that outdated Policy states that "When allowed by a social media site's terms of service, accounts shall be created using a generic e-mail address...". Additionally, Section 6.1.4. of CFW Administrative Regulation D7 (AR-D7), *Electronic Communications Resources Use Policy*, prohibits the use of personal email accounts to conduct City business. Interviews with CPE staff determined they were unaware that AR-D7 prohibited the use of personal email accounts to conduct City business. Electronic communications are defined within AR-D7 as any information or content transferred via signals, writings, images, or sounds, that is created, sent, forwarded, replied to, transmitted, distributed, broadcasted, stored, held, copied, downloaded,



displayed, viewed, read, or printed by one or several electronic communication systems or services (e.g., emails and web pages).

Recommendation 1A: *The Chief Communications Officer should update the social media policy to prohibit associating personal (e.g., jdoe@gmail.com) and CFW specific personal email (jdoe@fortworthtexas.gov) addresses to CFW social media accounts, and require the use of generic CFW email addresses (e.g., fortworthdept@fortworthtexas.gov).*

Auditee's Response: Concur. The Communications and Public Engagement Office (CPE) concurs with this recommendation and will work with Departmental Directors and Public Information Officers (PIOs) to initiate the recommended changes. The primary responsibility will lie with the Chief Communications Officer, assisted by the Communications Team led by Valerie Colapret and/or those assigned as department liaisons. Citywide alignment with the recommendation will be assessed and accomplished within 24 months. Additionally, we acknowledge that while staff and PIOs may have previously used their individual city email addresses or personal email addresses to create accounts, we agree with the best practice of ensuring all social media accounts are associated with generic COFW email addresses.

Target Implementation Date: December 31, 2026

Responsibility: Chief Communications Officer, supported by the Communications Team (led by Valerie Colapret) and department liaisons

Applicable Department Head: Reyne Telles, Chief Communications Officer\

Applicable Assistant City Manager: Mark McDaniel, Deputy City Manager

Recommendation 1B: *The Chief Communications Officer should notify Department Heads of personal and non-generic/individual city email addresses being used for CFW social media accounts. Department Heads should then ensure compliance with City regulations (i.e., use of generic CFW email addresses).*

Auditee's Response: Concur. The Chief Communications Officer will notify Department Heads of individuals using personal or non-generic city email addresses for social media accounts. This change in practice and policy will be communicated at an upcoming Department Head meeting, which the Chief Communications Officer organizes monthly. This agenda item will be included to ensure citywide compliance.

Target Implementation Date: April 30, 2025

Responsibility: Chief Communications Officer

Applicable Department Head: Reyne Telles, Chief Communications Officer

Applicable Assistant City Manager: Mark McDaniel, Deputy City Manager

2. The City's social media policy is outdated.

The current social media policy, Administrative Regulation D-12 (AR-D12), *Use of Social Media for Official City of Fort Worth Business*, had not been updated since it was adopted on March 1, 2011. CPE Department staff indicated they were unaware of the 2011 policy, but were aware of a FY2023 Social Media



policy that was in development, but not approved. It should be noted that AR-D12 is referenced in the CFW Communications Handbook, which was last updated in 2015.

Based on communication with various CFW staff who use social media, at least one department was using the FY2023 draft policy to manage its social media. Internal Audit was informed the CPE Department provided the user department with the FY2023 policy because the department requested a policy. Through interviews and written communications with City departments, some departments stated they were unaware of a CFW social media policy. Internal Audit did note that AR-D12 focuses more on policy matters (e.g., prohibited/inappropriate use, specific usage procedures, roles, and responsibilities, etc.), whereas the draft FY2023 policy addresses trends and recommended social media practices.

The lack of detailed written standard operating policies and procedures could result in different interpretations among staff who are responsible for social media platforms. The Committee of Sponsoring Organizations states that control activities should be developed and implemented so that an organization's risks to achieving its business objectives are mitigated, in full or in part, ensuring that such oversight activities are responsive to those business objectives, including reporting, and related risks.

Recommendation 2: *The Chief Communications Officer should ensure that the city-wide Social Media Policy is updated to reflect current requirements for the use and management of social media.*

Auditee's Response: Concur. The Chief Communications Officer acknowledges that the current Social Media Policy is outdated and does not reflect best practices. At the time of the audit, CPE was in the process of updating the policy. CPE paused any additional updates to the policy until the audit was complete. This policy will be finalized and distributed to all relevant users.

Target Implementation Date: December 31, 2025

Responsibility: Chief Communications Officer, supported by Communications Team
(led by Valerie Colapret)

Applicable Department Head: Reyne Telles, Chief Communications Officer

Applicable Assistant City Manager: Mark McDaniel, Deputy City Manager

3. Management and oversight of the PageFreezer social media archival contract and software are inadequate.

The CFW purchased social media archival software (PageFreezer) in October 2023. PageFreezer archives social media sites in real-time, allowing for the capture of posts made to those sites. PageFreezer is also capable of archiving activity for social media platforms used by CFW, including Facebook, Twitter/X, Instagram, YouTube, and LinkedIn.

During our review of PageFreezer contract documentation stored on the City Secretary Office's public website, we determined that the Software Order form, Subscription Services form, Privacy Policy, and Acceptable Use Policy were missing, even though they are referenced on the first page of the contract as being included. Through interviews with CPE staff, we determined the CPE Department did not have copies of the aforementioned documents. Therefore, the documents were not forwarded to the City Secretary's Office.



Section XII of Administrative Regulation C-13, *Procurement of Goods and Services*, requires Department Heads to designate a Contract Compliance Manager for each department-related contract. The designated Contract Compliance Manager is responsible for ensuring each assigned contract is properly managed. Such management includes completing contract amendments and verifying the availability of funds for such amendments. The Contract Compliance Manager is also responsible for ensuring all documentation related to a contract is routed to the appropriate CFW staff for signature, and then routed to the City Secretary's Office to be logged and uploaded onto the City's public website.

Renewing the PageFreezer contract could be made problematic because of missing documentation, particularly if a contract's original Contract Compliance Manager is replaced by someone unfamiliar with the contract and its history.

Recommendation 3: *The Chief Communications Officer should ensure that the Communications and Public Engagement Department provides complete contract information to the City Secretary for logging and subsequent posting onto the City Secretary's Office webpage.*

Auditee's Response: Concur. The Communications and Public Engagement Office will ensure that all contract information related to the PageFreezer social media archival contract is provided to the City Secretary for proper logging. The missing information has now been submitted, and this process will be followed for all future contracts.

Target Implementation Date: Completed (with ongoing compliance for future contracts)

Responsibility: Evonia Daniels, Management Analyst II, Communications and Public Engagement Office

Applicable Department Head: Reyne Telles, Chief Communications Officer

Applicable Assistant City Manager: Mark McDaniel, Deputy City Manager



Acknowledgements

The Department of Internal Audit would like to thank the Communications and Public Engagement, Code Compliance, Economic Development, Environmental Services, Fire, Library, Neighborhood Services, Office of Emergency Management, Office of the Police Oversight Monitor, Park and Recreation, Public Events, and Water Departments for their cooperation and assistance during this audit.