

NEVADA SYSTEM OF HIGHER EDUCATION
SYSTEM OFFICE
SOCIAL MEDIA
Internal Audit Report
Fall 2015

GENERAL OVERVIEW

Social media is the group of web-based technologies and platforms that enable users to create, share, or exchange information including pictures and videos in virtual communities and networks. Oversight of the social media function within the System Office of the Nevada System of Higher Education (NSHE) is administered by personnel within the Government and Community Affairs division. The System Office currently operates social media accounts on multiple platforms including Facebook, Twitter, LinkedIn, YouTube, and Flickr.

The use of social media has increased substantially in our society recently and continues to grow. While personal use of social media can have various objectives, the intent of the System Office's use of social media is to disseminate information about NSHE, not to serve as platforms for discourse with followers. Risks of organizational use of social media include noncompliance with legal and regulatory requirements, improperly secured and managed accounts, and the potential for brand and reputational damage as the result of improper or erroneous information being placed on social media sites.

It should be noted that this review encompassed the use and management of social media at the System Office only. The social media accounts utilized by the various NSHE institutions are more numerous, active, and decentralized than those reviewed in this audit. As such, there is a corresponding increase in risk associated with social media use at the institutions. The logical progression to this audit would be to perform institutional reviews on this topic.

SCOPE OF AUDIT

The Internal Audit Department has completed an assessment of social media operations at the System Office of the Nevada System of Higher Education as of the Fall 2015 academic semester.

Our review was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* issued by the Institute of Internal Auditors, and included interviews of System Office personnel, review of records, and other auditing procedures as we considered necessary. The tests included, but were not necessarily limited to, these areas.

1. Reviewing policies and procedures regarding social media governance and oversight.
2. Reviewing minutes of various system committees to determine whether social media is a topic of discussion.
3. Reviewing social media responsibilities, approval processes, and escalation policies within the System Office.
4. Reviewing organizational plans and strategies related to social media to determine whether the use of social media is aligned with the System Office's goals and objectives.

In our opinion, we can be reasonably assured that the management of social media at the System Office is satisfactory. Implementation of the following recommendations, however, would help mitigate future risks and improve social media processes within the System Office and across NSHE.

GOVERNANCE AND OVERSIGHT

Policies and executive oversight are important for a responsible social media function. Appropriate management of content and distribution led by effective procedures is essential for

the System Office's social media activities. A discussion with Government and Community Affairs personnel indicated that appropriate oversight and procedures have been established but they have not been formalized in a written document.

We recommend a detailed social media charter be created for the System Office that includes approval flow charts, defined roles and responsibilities, and crisis management policies.

Institution Response

We agree with this recommendation.

- **What will be done to avoid the identified problems and issues in the future? The** NSHE Government and Community Affairs department will document current procedures, as well as the relevant social media roles in the Position Description Questionnaires (PDQ) of the three employees in the department.
- **How compliance and future good management and practice will be measured and assured.** Compliance and management will be formally reviewed on an annual basis during each employee's performance review.
- **Who will be responsible and may be held accountable in the future if repeat or similar problems occur?** The Manager of Public Information will maintain the documents and work with department head to make certain they are current as needs change.
- **When the measures will be taken and on what schedule compliance and good practice will be secured.** The documentation will be in place by the end of May 2016 and will be reviewed on an annual basis.
- **How compliance and performance will be documented for future audit, management and performance review.** Compliance will be documented through the PDQ and performance will be evaluated during the employee's annual review.

Follow-up Response

The PDQs for staff in Government and Community Affairs have been updated to reflect each individual's role concerning System Administration's planning and execution of social media. An internal set of guidelines was also created on August 1, 2016 to formalize the previous work practices.

OTHER

The following item was noted during this review. It should be noted that the NSHE Government and Community Affairs Office is not responsible for the lack of social media policies mentioned. It is suggested, however, that the office be involved in the development of such policies, as described below.

SOCIAL MEDIA POLICIES - NSHE

We noted system-wide policies do not exist that address social media and the manner in which this activity should be managed. The development of such policies would be beneficial across NSHE in establishing minimum standards and guidance in this area.

We recommend that social media policies be developed for inclusion in the Board of Regents Handbook and/or the NSHE Procedures and Guidelines Manual. We recommend the policies address general guidelines/best practices for establishing and administering social media accounts, security, plan and strategy of the accounts, and standards to ensure content is in compliance with applicable laws. We recommend the Government and Community Affairs Office develop an initial draft of the policies for review and approval by required parties.

Institution Response

We agree with this recommendation.

- **What will be done to avoid the identified problems and issues in the future?** NSHE Government & Community Affairs and Legal Affairs staff will work with the eight institutions to review the existing, and forthcoming, campus social media policies to ensure consistency and adherence to current policies in the Board of Regents Handbook and Procedures & Guidelines Manual. In addition, recommendations will be developed based on national best practices in higher education social media policies.
- **How compliance and future good management and practice will be measured and assured.** NSHE Government & Community Affairs and Legal Affairs staff will work with the eight institutions to provide guidance on the development of each institution's

social media policy.

- **Who will be responsible and may be held accountable in the future if repeat or similar problems occur?** If additional policies need to be created in the Board of Regents Handbook or Procedures & Guidelines Manual, NSHE Government & Community Affairs and Legal Affairs staff will develop those policies in partnership with the eight institutions.
- **When the measures will be taken and on what schedule compliance and good practice will be secured.** Social media policy review and recommendations will be completed no later than December 31, 2016.
- **How compliance and performance will be documented for future audit, management and performance review.** Any new System social media policies will be documented in the Board of Regents Handbook and/or the NSHE Procedures & Guidelines Manual. Institutional policies that are currently documented, or will be documented, will be maintained by each institution.

Follow-up Response

Government and Community Affairs is continuing to work with NSHE Legal Affairs to review guidelines and existing policies within the Board of Regents Handbook and NSHE Procedures & Guidelines Manual. We anticipate the possibility of bringing proposed policy changes to the Board of Regents in early 2017.

The Internal Audit Department appreciates the cooperation and assistance received from the NSHE Government and Community Affairs office during this review.

Reno, Nevada
March 17, 2016

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