



# OFFICE OF THE INSPECTOR GENERAL MONTGOMERY COUNTY MARYLAND

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INSPECTOR GENERAL

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## Office of Public Information

OIG Publication # 25-002

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# EXECUTIVE SUMMARY

This assessment of the Office of Public Information (PIO) was initiated pursuant to our mandate to conduct reviews of the internal accounting processes and controls used by each department and principal office in the Executive Branch. In addition to conducting a risk assessment of the PIO's internal accounting and contracting processes, we evaluated the PIO's responsibilities under Administrative Procedure (AP) 6-8, *Social Media*. Our review found that the PIO has not fully met their obligations as outlined in AP 6-8. We also observed that opportunities exist for the PIO to take a more proactive approach to ensure that the dissemination of official county information is accessible, consistent, and equitable.

## OBJECTIVES

Through this review, we attempted to (1) determine if the PIO was following their policies and procedures in listing department social media sites on the county website and ensuring naming and visual consistency across platforms and (2) evaluate the extent to which the PIO incorporates accessibility best practices into its work product.

## SCOPE AND STANDARDS

Our review covered all PIO policies, procedures, and practices related to department responsibilities per AP 6-8, *Social Media*, and those related to accessibility in drafting, editing, and publishing work product from July 1, 2022, through April 1, 2024, and was conducted in accordance with the Association of Inspectors General *Principles and Quality Standards for Inspections, Evaluations, and Reviews by Offices of Inspector General* (May 2014).

## RESULTS

- The PIO does not maintain an updated list of social media sites in use by county departments.
- The PIO has no policies or procedures that ensure naming conventions and visual consistency are universally applied to all county social media sites.
- The PIO has no written procedures for ensuring the accessibility and equitable distribution of its various work products.
- The PIO could advance social justice by being more proactive and sharing its expertise with other departments.

## RECOMMENDATIONS

We recommend the PIO:

- Implement procedures to routinely update the social media directory
- Establish formal guidance on naming conventions and visual consistency
- Routinely review county social media sites to ensure compliance
- Revise AP 6-8 to reflect updated concerns surrounding social media

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## BACKGROUND

The Office of Public Information's (PIO) mission is to provide timely, accurate, and effective communication to the public. The PIO provides information through mass media, social media, publications and graphics, and cable television programming. The PIO manages the county's blog which includes messages from the Office of the County Executive, department-specific announcements and information, and upcoming events and activities. In conjunction with Technology Enterprise and Business Solutions (TEBS), the PIO is also responsible for updating information contained on the county's website. Until July 1, 2024, the PIO managed requests for information and assistance through the MC311 call center.<sup>1</sup>

During the scope of our review, the PIO had approximately 75 employees and was organized into three divisions: public relations (e.g., press releases and social media); production (e.g., photography, video content, graphic design, electronic signboards, cable, and social media); and the MC311 call center.

The department's approved operating budget for FY 2023 and 2024 was \$6,735,699 and \$7,146,709, respectively. The approved budget for FY 2025 is considerably less at \$2,957,149 due to the MC311 call center transferring to TEBS.

Published in 2012, Montgomery County Administrative Procedure (AP) 6-8, *Social Media*, provides guidance to county departments and agencies on the use of social media. Social media is "an umbrella term that encompasses the various programs and applications the county uses to make content publicly available on the internet."<sup>2</sup> AP 6-8 establishes that the PIO is responsible for maintaining an updated list of all social media sites in use by county departments and developing and/or modifying standards for naming conventions and visual consistency for county social media sites. In 1998, the county published AP 1-7, *Use of Montgomery County Coat of Arms and Emblem*, which establishes a unified, consistent image in county communications with the public. The PIO is also responsible for approving requests for exemptions to this policy.

### Objectives, Scope, and Methodology

This review was performed consistent with our mandate to assess the internal accounting processes and controls used by each department and principal office in the county's Executive Branch. Our initial risk assessment noted that the PIO has two purchase cards and made only 52 purchases from July 1, 2022, through February 28, 2024, totaling \$11,065.26. They perform no cash handling transactions. We determined the risk related to internal accounting processes and controls to be low due to the limited number of transactions, authorized users, and low dollar amounts. The PIO did not manage any contracts or capital improvement projects during the scope

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<sup>1</sup> This function was transferred to the Department of Technology Enterprise and Business Solutions (TEBS) on July 1, 2024, the beginning of fiscal year (FY) 2025.

<sup>2</sup> Administrative Procedure 6-8, *Social Media*

## BACKGROUND

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of our review, but they did obtain monthly subscription services from two vendors via direct purchase orders. The purchases are exempt by policy and not subject to the county's procurement law. For FY 2024, the total value of these purchase agreements was approximately \$74,000. Based on this information, we determined that the risk related to contracting processes was also low.

After considering the results of our financial risk assessment and reviewing applicable county laws, policies, and regulations relevant to PIO operations, we sought to (1) determine if the PIO was following its policies and procedures in listing department social media sites on the county website and ensuring naming and visual consistency across platforms and (2) evaluate the extent to which the PIO incorporates accessibility best practices into its work product. In conducting this review, we interviewed county staff and management, and reviewed relevant websites, social media accounts, law, regulation, and policy.

Our review was conducted between March and May 2024, in accordance with the Association of Inspectors General, *Principles and Standards for Office of Inspector General, Quality Standards for Inspections, Evaluations, and Reviews* (May 2014).

## FINDINGS AND RECOMMENDATIONS

In this review we focused on the PIO's obligations under AP 6-8, *Social Media*, and its efforts to distribute official county information. We found that the PIO does not maintain an up-to-date list of social media sites used by county departments, nor has it developed standards for naming and visual consistency for county affiliated social media sites, as required by AP 6-8.

More broadly, we observed that the county has not assigned any single entity the role of ensuring that informational products are consistent and accessible to all, a role that may well be suited to the PIO given its subject matter expertise and daily operations. Aligned with the county's commitment to making its programs, services, activities, and facilities accessible to all members of the public, the county also has a responsibility to ensure that not only digital products on the web, but also other public documents, communications, and materials are accessible to all residents, including people with hearing and vision impairments, non-English speakers, and those without access to the internet.

### Administrative Procedure 6-8, Social Media

**Finding 1: The PIO does not comply with Administrative Procedure 6-8 and the procedure is outdated.**

In 2022, the county established a process to review APs periodically (at least every three years) to ensure they are updated when needed. Although AP 6-8 was last reviewed in 2022, it has not been updated since its issuance in 2012. PIO management agreed that AP 6-8 is outdated and indicated that it is scheduled to be updated by December 2024. PIO staff shared that potential updates should include defining authorized behavior, guidelines for posting or interacting with content, conventions on naming or other elements that must be on the page, and text limits on graphics.

AP 6-8 requires the PIO to maintain an updated list of social media sites in use by county departments. A directory can be found on the county's website which contains links to department profile pages on various social media platforms.<sup>3</sup> We found that the directory contained multiple outdated links and was missing at least 17 official county social media accounts. PIO staff stated that the current social media directory is not comprehensive and is loosely maintained.

According to AP 6-8, all Executive Branch department heads must notify the PIO when they want to establish an official departmental account on a social media site. Although there is no formal mechanism to notify the PIO of a new social media account, we were told that a PIO staff member is assigned to each department and the expectation is that the department would inform this individual of any new social media accounts. The PIO also hosts voluntary biweekly meetings with department representatives to exchange information and discuss available PIO services, such as

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<sup>3</sup> <https://www.montgomerycountymd.gov/OPI/socialmedia.html>

## FINDINGS & RECOMMENDATIONS

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drafting press releases or developing graphics for social media. PIO staff stated that this is another opportunity for a department to notify them of any new social media accounts. The PIO does not otherwise offer training or conduct outreach to departments informing them of their obligation under AP 6-8.

These informal methods do not ensure that the PIO is always promptly informed of a new social media account. Moreover, the PIO does not take steps to proactively identify new county social media accounts. If they learn of a new social media account and confirm the legitimacy with the relevant department, PIO staff add the new account to the social media directory. However, even after the directory was updated on April 29, 2024, we still found missing and inaccurate information.

In addition to maintaining an updated list of county social media sites, AP 6-8 states that the PIO is responsible for developing and modifying naming conventions and visual consistency standards to be used on county social media sites. According to AP 6-8, standardizing naming conventions and visual elements of the county's various social media sites helps to "retain the public's trust in the County's presence in Social Media." AP 6-8 further states that county departments must receive approval from the PIO for all naming conventions used on departmental social media sites. Despite their responsibilities outlined in AP 6-8, the PIO has not established standards for naming conventions or visual consistency on county social media sites. If the county's social media accounts are difficult to identify or provide inconsistent messaging, the county risks confusing and/or frustrating residents and enabling misinformation.

AP 6-8 assigns several responsibilities to departments such as the inclusion of mandatory disclaimers, restrictions on content posts, and disclosure of information. Departments must also comply with AP 1-7, *Use of Montgomery County Coat of Arms and Emblem*, or request an exemption from the PIO if they choose to use the county's coat of arms or emblem on their social media site. Of note, neither AP assigns the PIO, or any other entity, the responsibility for reviewing or ensuring compliance with these requirements.

PIO graphic artists may use a document titled "Visual Guidelines" to inform their designs and typography for digital and print content. While this is a reference document that could be applied to all county publications and social media sites, it is not widely available outside of the PIO. Reportedly, the only other department that references this document is the Department of General Services Print Shop staff. Although not specifically required, the PIO has no protocols for ensuring departments comply with the Visual Guidelines. If PIO staff happen to view a county social media site, they rely on their experience to spot inconsistencies in the use of the county emblem and remediate them as there is no formal review process or automated assessment of social media pages.

## **Recommendation 1**

**We recommend the PIO:**

- a) Revise AP 6-8 to reflect updated concerns surrounding social media.**
- b) Implement procedures to routinely update the social media directory.**
- c) Centralize and widely disseminate guidance on naming conventions and visual consistency requirements.**
- d) Establish a method for the routine review of county social media sites to ensure compliance with the guidelines.**



## DIVERSITY, EQUITY, INCLUSION, AND ACCESSIBILITY OBSERVATION

According to the Racial Equity and Social Justice Act, all departments are required to design a racial equity and social justice action plan that, among other things, contains tools and strategies for redressing disparities. In developing their action plan, the PIO has an opportunity to advance social justice by proactively sharing its subject matter expertise with other county departments. The PIO could advise departments on communications strategies, employing consistent messaging, how to distribute materials to the widest possible audience, and the use of standardized accessibility considerations. Additionally, the PIO could further contribute to improving the equity and accessibility of public communications by creating checklists or other tools that departments could reference when producing content or drafting communications, working in partnership with TEBS to leverage best practices already in place on the county's web site into other media formats, and providing trainings to staff in other departments to increase awareness of and develop more inclusive communication strategies.

During this review, we noted that the PIO lacks a cohesive strategy and implementation process that ensures all published materials contain notices of accommodation, align with accessibility best practices, and reach the broadest possible audience. A lack of guidance in this area could lead to inequities, confusion, and insecurity about the legitimacy of information. As an example, we observed that although the PIO produces various types of work products, it often relies on internet outlets to circulate public information. In doing so, they are potentially missing a percentage of the population who may not routinely use or have access to the internet.

The risk of residents not receiving pertinent information, or receiving incompatible or conflicting information, is further elevated because no one entity is tasked with the responsibility of providing standards or guidelines to help ensure that public information and communications distributed by the county are inclusive and available to all. The county could further its efforts to make information more accessible to county residents by assigning a single department or entity the responsibility rather than letting each department take on the task individually, with no oversight. The PIO is perhaps best suited for this role.

## OIG COMMENTS TO CHIEF ADMINISTRATIVE OFFICER RESPONSE

The County Chief Administrative Officer's response to our report is included in its entirety in Appendix A. The response indicates concurrence with the OIG's recommendations. Appendix B summarizes the CAO's responses to individual recommendations and the OIG's assessment of the county's progress towards fully implementing the stated actions.

# APPENDIX A: CHIEF ADMINISTRATIVE OFFICER (CAO) RESPONSE



## OFFICE OF THE COUNTY EXECUTIVE


Marc Elrich  
*County Executive*

Richard S. Madaleno  
*Chief Administrative Officer*

### MEMORANDUM

August 8, 2024

TO: Megan Davey Limarzi, Inspector General

FROM: Richard S. Madaleno, Chief Administrative Officer 

SUBJECT: Inspector General Confidential Draft Report: Office of Public Information (OIG Publication #OIG-25-01)

Thank you for the opportunity to respond to the issues identified in the report. The County's Public Information Office (PIO) plays an important role in providing information to County residents, businesses, stakeholders, and the media regarding government programs and services. We are proud of their work and the services they provide in helping the County stay informed.

PIO has worked to expand its communications channels to improve the County government's communications with residents and businesses. Over the last few years, PIO has overseen the growth of the County's social media channels. These efforts have helped to create a greater awareness and understanding of County programs, services, and new initiatives. The department has expanded the County's presence on social media with accounts on X (formerly known as Twitter), Facebook, Instagram, LinkedIn, WhatsApp, YouTube, Flickr, and Nextdoor. The department has also focused on increasing the number of followers as well as engagement on these platforms. For example, the County account on X has nearly 100,000 followers; Facebook has 32,000; 3,200 on YouTube; and 1,800 on Instagram.

PIO has also built a significant number of subscribers to its press releases. There are approximately 12,400 subscribers to the English press releases and 4,400 to the Spanish language releases. In a typical week, the messages that PIO sends out via social media, press releases, and newsletters have the potential to reach millions of readers and followers.

Montgomery County is a very diverse jurisdiction, and PIO is focused on connecting with residents who may have previously received limited communications from the County. The department took over the management of the Español Facebook page in July 2023 and the number of followers has increased by 57 percent, with an average monthly reach of 45,000 people. The weekly electronic newsletter, which is sent to 500,000 email addresses and has a 40

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percent open rate, is now available in Spanish. PIO also translates approximately 75 percent of the press releases it distributes to the media and subscribers. Social media graphics are also translated. *Montgomery Al Dia* is a Spanish-language podcast and radio show that PIO produces.

These are just a few of the highlights that illustrate the variety of ways PIO assists County government in communicating with residents and other important stakeholders.

We acknowledge that there are opportunities to improve administrative processes within PIO. Such enhancements, including updated and improved documentation of processes are important, but often can be impacted by staffing and resources. Your report's findings and recommendations will be useful as we continue to improve processes in the future. We are committed to taking appropriate steps to address the report's findings and recommendations, as noted below.

**Recommendation 1:** PIO should revise Administrative Procedure (AP) 6-8, *Social Media*, to reflect updated concerns surrounding social media.

**CAO Response:** We concur with the recommendation. In 2022, the County established a process and schedule to review Administrative Procedures (APs) periodically, at least every three (3) years, to ensure they are updated when needed. AP 6-8 is scheduled for review during fiscal year 2025 and will be updated as appropriate. As noted in the report, the current AP is 12 years old. PIO is using this opportunity to undertake a comprehensive review of the AP to ensure the AP reflects current and expected future social media issues. PIO anticipates submitting a draft revised AP 6-8 by April 2025 for the Chief Administrative Office's (CAOs) review and approval and distribution by June 2025.

**Recommendation 2:** PIO should implement procedures to routinely update the social media directory.

**CAO Response:** We concur with the recommendation. As noted in the report, while there is a requirement that departments notify PIO of a new social media account, the requirement is not well known among County leadership. The report also pointed out that the current social media directory updated earlier this year may have missing or inaccurate information. By October 2024, PIO will conduct a follow-up review with departments to ensure the directory is current and accurate, and as part of the update to AP 6-8 referenced in the recommendation above, PIO will define the appropriate process departments must follow to ensure the directory is updated when a new social media account is established. Once the CAO's Office review is finalized, the updated revised AP will be distributed to all County managers and departmental staff that have responsibility for social media and outreach.

**Recommendation 3:** PIO should centralize and widely disseminate guidance on naming conventions and visual consistency requirements.

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**CAO Response:** We concur with the recommendation. PIO will develop specific guidance on naming conventions and visual consistency standards. In addition to informing departmental leadership of these guidelines, PIO will work directly with departmental representatives (public information officers and outreach staff) to ensure that the guidelines are understood and followed. PIO expects that this guidance will be completed and disseminated by November 2024.

**Recommendation 4:** PIO should establish a method for the routine review of County social media sites to ensure compliance with the guidelines.

**CAO Response:** We concur with the recommendation. PIO will establish a process to ensure periodic review of County social media sites for compliance. This process is a logical follow-on once the guidance on naming conventions and visual consistency requirements is established and disseminated. PIO expects to develop the process and implement it contemporaneously with the issuance of the guidance referenced in Recommendation 3 above.

With respect to the report's diversity, equity, inclusion, and accessibility observation, we acknowledge that there are always opportunities to further enhance the County's effectiveness in providing clear information and communications to County residents, businesses, and other stakeholders. The County leverages other partners to increase the effectiveness of its outreach and communication efforts. We will continue to assess such opportunities as we move forward.

Thank you for bringing these matters to our attention.

cc: Fariba Kassiri, Deputy Chief Administrative Officer, Office of the County Executive  
Barry Hudson, Director, Public Information Office  
Bill Broglie, Internal Audit Manager, Office of the County Executive

## APPENDIX B: RECOMMENDATION STATUS AND FOLLOW-UP

This Appendix provides a summary of the findings and recommendations presented in this report along with the OIG’s assessment of the county’s progress towards addressing the recommendations. The OIG categorizes progress towards implementation into the following 4 status groups:

- Open Unresolved: No management response, inadequate response, or no agreement on corrective action plan.
- Open In Progress: Agreed on planned action, auditee is in the process of implementing stated actions, but no evidence of implementation has yet been provided to the OIG.
- Open Resolved: Auditee provided support to OIG indicating implementation was complete, OIG testing to ensure implementation.
- Closed: Recommendation has been implemented.

Finding #	Finding	Recommendation	CAO Response	Status
1	The PIO does not comply with Administrative Procedure 6-8 and the procedure is outdated.	1a: We recommend the PIO revise AP 6-8 to reflect updated concerns surrounding social media.	Concur: AP 6-8 is scheduled for review during fiscal year 2025 and will be updated as appropriate. PIO anticipates submitting a draft revised AP 6-8 by April 2025 for the Chief Administrative Office’s (CAOs) review and approval and distribution by June 2025.	Open- In Progress

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	<p>1b: We recommend the PIO implement procedures to routinely update the social media directory.</p>	<p>Concur: By October 2024, PIO will conduct a follow-up review with departments to ensure the directory is current and accurate, and as part of the update to AP 6-8 referenced in the recommendation above, PIO will define the appropriate process departments must follow to ensure the directory is updated when a new social media account is established.</p>	<p>Open- In Progress</p>
	<p>1c: We recommend the PIO centralize and widely disseminate guidance on naming conventions and visual consistency requirements.</p>	<p>Concur: PIO will develop specific guidance on naming conventions and visual consistency standards. PIO expects that this guidance will be completed and disseminated by November 2024.</p>	<p>Open- In Progress</p>
	<p>1d: We recommend the PIO establish a method for the routine review of county social media sites to ensure compliance with the guidelines.</p>	<p>Concur: PIO will establish a process to ensure periodic review of County social media sites for compliance. PIO expects to develop the process and implement it contemporaneously with the issuance of the guidance referenced in Recommendation 3 above.</p>	<p>Open- In Progress</p>