

**Farm Credit Administration
Office of Inspector General**

Inspection Report
**Farm Credit Administration's
External Communication Process**

I-22-01

August 2, 2022

FCAOIG

Farm Credit Administration
Office of Inspector General



Farm Credit Administration
Office of Inspector General

August 2, 2022

The Honorable Glen R. Smith, Board Chairman
The Honorable Jeffery S. Hall, Board Member
Farm Credit Administration
1501 Farm Credit Drive
McLean, Virginia 22102-5090

Dear Chairman Smith and Board Member Hall:

The Office of Inspector General completed an inspection of the Farm Credit Administration's (FCA) external communication process. The objective of this inspection was to determine whether FCA has an effective and efficient external communication process.

During the inspection, we found that FCA initiated and extended a social media presence over the last decade, developed policies and procedures on social media, and maintained a website. The Office of Congressional and Public Affairs had developed draft internal procedures identifying specific roles and responsibilities of the office and its personnel. We also found in testing of certain website requirements that FCA had complied with selected elements that we reviewed and hired an external contractor to aid with website compliance.

However, we identified opportunities to improve the utilization and overall effectiveness of social media communications. The controls over social media and the FCA website need to be updated, implemented, and improved. Certain processes were not clearly defined or documented, and other processes were documented but not implemented. Applicable policies and procedures were also outdated.

We made five recommendations to improve the external communication process. Management agreed or partially agreed with the recommendations and provided corrective actions that were responsive to our recommendations. Although Management partially agreed with recommendation 1, the corrective actions address the intent of the findings and recommendations. We find the provided actions responsive to the recommendations.

We appreciate the courtesies and professionalism extended by FCA to our staff during the inspection. If you have any questions about this inspection, we would be pleased to meet with you at your convenience.

Respectfully,

A handwritten signature in black ink that reads 'Sonya K. Cerne'.

Sonya K. Cerne
Assistant Inspector General for Audits, Inspections, and Evaluations

EXECUTIVE SUMMARY

FCA's External Communication Process

Report No. I-22-01

August 2, 2022

Objective

The objective of this inspection is to determine whether FCA has an effective and efficient external communication process.

Recommendations

The Office of Inspector General made five recommendations to the Office of Congressional and Public Affairs to enhance the external communication process. The recommendations relate to analyzing social media efforts and strategies, developing and documenting controls, and documenting and implementing policies and procedures.

Agency Response

Management agreed or partially agreed with, and provided corrective actions for, all recommendations. Although Management only partially agreed to recommendation 1, the actions are responsive to the intent of the recommendation and the findings.

Why We Did This Inspection

The Farm Credit Administration (FCA or Agency) communicates with its stakeholders in a variety of ways to increase awareness, support, and understanding of the Agency's financial regulator role. The external communication process is integral to the Agency and ensures consistency and accuracy in messaging.

How We Did This Inspection

We reviewed FCA's processes for certain external communication, including the FCA website, social media accounts, and policies and procedures. We reviewed the content on FCA's social media accounts. We sampled and tested approvals for social media postings. We also tested select provisions of website requirements.

What We Found

During the inspection, we found that FCA initiated and extended a social media presence over the last decade, developed policies and procedures on social media, and maintained a website. OCPA had developed draft internal procedures identifying specific roles and responsibilities of the office and its personnel. We also found in testing of certain website requirements that FCA had complied with selected elements and hired an external contractor to aid with website compliance requirements.

However, we found that FCA's use of social media is quite limited, providing opportunities to improve the utilization and overall effectiveness of these communications. The controls over social media and the FCA website need to be updated, implemented, and improved. Certain processes were not clearly defined or documented. Other processes were documented but not implemented. Applicable policies and procedures were also outdated.

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BACKGROUND

Farm Credit Administration

The Farm Credit Administration (FCA or Agency) is an independent federal agency responsible for regulating and supervising the Farm Credit System (System) and the Federal Agricultural Mortgage Corporation. The Agency is responsible for ensuring that all System institutions are safe, sound, and dependable sources of credit and related services for all creditworthy and eligible persons in agriculture and rural America. In order to successfully achieve its mission, FCA has an external communication process to communicate messages, publications, reports, and other important information relating to the Agency.

Office of Congressional and Public Affairs

FCA's Office of Congressional and Public Affairs (OCPA) serves as the Agency's principal point of contact for media, System institutions, System borrowers, and the public. OCPA serves as FCA's congressional liaison and also provides information to external audiences through news releases, fact sheets, reports, videos, and other publications. Content on the FCA website and social media accounts is also managed by OCPA.

OCPA works with other Agency offices to plan and prepare Agency communications. However, OCPA is responsible for approving all information produced for external audiences before the product is disseminated.¹ OCPA reviews information products for editorial and design purposes and to ensure consistency and compliance with certain requirements, such as the Plain Writing Act of 2010. These products include new or revised publications and information posted on the FCA website and social media accounts.

OCPA is divided into two components, congressional affairs and public affairs. The office is led by the Director who oversees the Deputy Director and two congressional affairs staff members. The Deputy Director supervises staff serving in public affairs, program support, and administrative assistant roles. The office also utilizes contractors for services that include writing and editing, video recording and production, and website maintenance and compliance.

The mission of the Office of Congressional and Public Affairs is "to direct all agency congressional activities; to manage the coordination and production of all Agency public information and Agencywide internal communication; and to build awareness, support, and understanding of the important role the Farm Credit Administration plays in ensuring the prosperity of agriculture and rural America."

¹ OCPA does not approve Office of Inspector General products and publications.

External Communication Mechanisms

FCA utilizes many mechanisms and mediums for external communication. The FCA website is intended to serve as the primary source of information for all external audiences. FCA's website serves as a hub for information relating to the Agency, laws and regulations affecting the Agency and System oversight, and other news. External stakeholders can also sign-up to be notified via email about all publicly released documents. FCA also utilizes certain social media platforms to communicate with outside audiences. Currently, these platforms include:



Twitter- a platform to communicate through quick, frequent messages, which may contain photos, videos, links, and text. A message posted to twitter is called a tweet.



Facebook- a platform that allows organizations to connect with users by posting content that is visible to users that like or follow the organization's page.



YouTube- a platform to watch and share videos. Youtube channels are used to establish a public presence by uploading videos.



LinkedIn- a platform for organizations to post professional information such as industry updates, job opportunities, and other information about their organization.

Related Policies, Procedures, and Plans

OCPA has several policies and procedures relating to the external communication process. The following Policies and Procedures Manual (PPM) sections are most applicable to this inspection:

PPM 201, Information Release Policy-
The policy's stated purpose is to provide for the uniform release and distribution of public information in a manner consistent with applicable laws, regulations, and Agency policy.

PPM 202, FCA Publications and World Wide Web Homepage Policy-
The policy sets forth the manner of approval for all official FCA publications and information produced for electronic dissemination on FCA's home page.

PPM 205, Policy for Official Use of Social Media- The policy covers FCA's creation, maintenance, and monitoring of all social media applications, channels, content, and profiles with consideration of security, privacy, and transparency.

OCPA also has a draft internal procedures manual. The manual outlines:

- work and organization of OCPA,
- congressional affairs activities and procedures,
- borrower complaints,
- public affairs,
- administration of the office, and
- processes and templates for certain types of communications.

In addition, OCPA activities are outlined in the OCPA Operating Plan. The Fiscal Years 2021-2022 Operating Plan covers the responsibilities of the office by function. The plan also outlines OCPA's mission, and how the office's objectives and activities help achieve Agency goals.

Prior Office of Inspector General Reports

The Office of Inspector General (OIG) issued a management advisory report in September 2012, *Survey of the Farm Credit Administration's Use of Social Media* (M-12-01). The objective of the review was to determine the extent that FCA and its employees used social media tools and to review FCA's governance, risk management, awareness training, and monitoring of social media. The advisory report was completed before FCA adopted an active social media presence and included a survey of employees on their uses of social media tools. The report made six suggestions to the Agency pertaining to a social media presence, monitoring social media platforms, and annual security awareness training.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of this inspection was to determine whether FCA has an effective and efficient external communication process.

Scope

The inspection was conducted at FCA from February 2022 through June 2022. The scope of the inspection was limited to certain external communication processes. We limited our testing to certain areas as noted below in the methodology section.

Methodology

We took the following steps to accomplish the objective:

- Identified and reviewed applicable laws, regulations, guidance, and other background information applicable to the objective.
- Identified and reviewed applicable internal FCA policies and procedures.
- Reviewed prior FCA OIG and other external reviews related to the inspection objective.
- Interviewed selected OCPA and Office of Information Technology (OIT) personnel responsible for external communication and FCA's website oversight.

Tests Performed

- Determined FCA's social media presence by reviewing FCA's website and social media accounts.
- Reviewed the verification processes, which ensure accounts are authentic, for Facebook, Twitter, LinkedIn and YouTube accounts.
- Reviewed selected agencies' social media presence to understand FCA's content, reach, and practices in comparison to other federal financial regulatory agencies. We compared follower/subscriber numbers and verification information, based on publicly available information, to FCA accounts.
- Requested and reviewed accesses to the social media accounts and website controls and determined if accesses were appropriate for staff roles and responsibilities.
- Determined the approval process for social media postings by reviewing posting to FCA's Facebook and Twitter accounts for the January 1, 2021 to December 31, 2021 timeframe. We judgmentally sampled 30 selected social media activities to review approvals from the Office of General Counsel (OGC) and OCPA. The sample was based on the date of the

approvals, type of posting, and the approval procedures. Because the sample was judgmental, it cannot be projected to the population.

- Reviewed requirements set forth in U.S. Office of Management and Budget (OMB) Memorandum M-17-06, *Policies for Federal Agency Public Websites and Digital Services*. Selected certain requirements and tested whether the FCA website contained the required information. Selected requirements for testing were based on the objective and scope of the inspection and applicability to the FCA website. Because the sample was judgmental, it cannot be projected to the population.
- Reviewed and analyzed the OCPA social media tracker for record retention practices. We selected all social media posts for 2021 that were maintained as official records. Because the sample was judgmental, it cannot be projected to the population.
- Reviewed position descriptions and internal procedures to determine what roles and responsibilities were assigned to OCPA staff.

Quality Standards for Inspection and Evaluation

This inspection was performed in accordance with the Council of the Inspectors General on Integrity and Efficiency's Quality Standards for Inspection and Evaluation. These standards require that we plan and perform the inspection to obtain sufficient and appropriate evidence that provides a reasonable basis for our findings, conclusions, and recommendations. We assessed internal controls and compliance with laws and regulations to the extent necessary to satisfy the objective. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our inspection. We assessed the information and data collected during the inspection and determined it was sufficiently reliable and valid for use in meeting the inspection objective. We assessed the risk of fraud related to our inspection objective while evaluating evidence and had no matters come to our attention indicating fraud or illegal acts were occurring; however, our review was limited to the inspection objective. Overall, we believe the evidence obtained is appropriate and sufficient to provide a reasonable basis for our findings and conclusions based on the inspection objective.

INSPECTION RESULTS

During the inspection, we found that FCA initiated and expanded its social media presence over the last decade, developed policies and procedures on social media, and maintained the Agency website. OCPA identified specific roles and responsibilities of the office and its personnel. We also found, in testing certain website requirements, that FCA had maintained required elements on its website and hired a contractor to aid with compliance requirements.

However, we found FCA's use of social media to be quite limited, and that the Agency conducted no analysis of the effectiveness of its social media communications. Controls over social media and the FCA website need to be updated, implemented, and improved, and certain processes are not clearly defined or documented. Other processes were documented but not implemented.

Social Media Presence

FCA has a social media presence on Facebook, Twitter, LinkedIn, and YouTube. FCA's PPM 205, *Policy for Official Use of Social Media*, states that social media is a group of online tools and services that encourage interaction and engagement among the individuals who use these tools. The PPM also explains FCA uses social media as a strategic communication tool to facilitate both internal and external communication and that the benefits include:

- improving the Agency's reach to diverse audiences;
- furthering the delivery of consistent, timely, repetitive, and tailored/targeted messages; and
- facilitating engagement and transparency.

Social Media Use and Reach

Before implementing social media, the Agency gathered information through an internal workgroup to study potentially using social media. In 2012, the FCA Social Media Workgroup² recommended that FCA adopt a limited social media program to serve two purposes:

- First, to help the Agency communicate more effectively with and better educate its audiences. The Social Media Workgroup's proposal explains that different demographic groups rely on different communication platforms, and by communicating on different platforms, FCA could cater to the preferences of our audience demographics.
- Second, social media would help FCA get information out quickly in the event of a crisis. The proposal explains that responding quickly during times of crisis can prevent or minimize further crises.

Initially, FCA utilized LinkedIn and YouTube for social media posts. It was not until 2018 that FCA expanded its use of social media by utilizing Twitter and Facebook accounts. The proposal presented to leadership to add these social media accounts stated key themes for the Agency's social media posts could include economic information in the agricultural industry as well as the System's status and leadership. The proposal also stated that the Agency could use social media posts to recruit job seekers and correct any misinformation about the Agency that might have been provided by other sources.

We found that FCA's use of social media could be improved. We sampled FCA's postings on Twitter and Facebook from January 1, 2021 to December 31, 2021.³ For the year, FCA posted about 80 different times on each platform. The majority of FCA posts we sampled were hiring announcements and notices of FCA board meetings. However, we noted other federal financial regulatory agencies use social media to communicate on various topics. Examples of content

² The Social Media Workgroup was led by the Director of OCPA and consisted of representatives from OCPA, what is now the Office of Agency Services, the Office of Examination and OGC.

³ In general, content is simultaneously posted to the Agency's Facebook and Twitter accounts. YouTube and LinkedIn postings were not included in the sample.

shared by these agencies includes education on the Agency’s role and mission, information on employee programs and initiatives, cybersecurity, special emphasis programs, and consumer protection information. The number of social media followers/subscribers could be affected by the type and frequency of posted content. Differing missions and stakeholders could also affect the number of followers/subscribers. However, FCA may be able to use some of the content ideas from other accounts.

The following table shows a comparison of FCA’s social media accounts and followers/subscribers as compared to other selected federal financial regulatory agencies for the same four social media platforms utilized by FCA:

FCA’s Social Media Presence Compared to Other Select Federal Financial Regulatory Agencies as of March 2022

Name of Organization	Facebook Followers	Twitter Followers	LinkedIn Followers	YouTube Subscribers
Farm Credit Administration	273	248	3,859	116
Commodity Futures Trading Commission	29,000	60,800	6,857	2,180
Federal Deposit Insurance Corporation	21,000	32,600	70,006	7,430
Federal Housing Finance Agency	2,400	26,000	17,317	831
Federal Reserve Board	35,000	879,200	84,603	1,110
National Credit Union Administration	10,000	10,400	26,333	3,160
Office of the Comptroller of the Currency⁴	22,000	31,900	51,463	1,068
Securities and Exchange Commission	32,000	430,200	87,665	7,830

Unverified Social Media Accounts

While FCA’s YouTube channel is verified, its Facebook and Twitter accounts are not considered verified. The verification badge (check mark) next to the Facebook and Twitter account name and YouTube channel lets users know that an account of public interest is authentic. Each social network utilized by FCA, except for LinkedIn,⁵ has a process for applying for a verified account for organization accounts. For example, to receive the verification badge on a Twitter account, the

⁴ The Office of the Comptroller of the Currency is an independent bureau within the United States Department of Treasury.

⁵ LinkedIn has a verification process for individual accounts only and not organization accounts.

account must be authentic, notable, and active. Specifically, for government Twitter accounts, there are two prerequisites. First, the account includes a relevant link to an official government web address on its profile. Second, the account must satisfy the criteria outlined for an “active account.” Although Twitter suspended its verification process in 2017, it reinitiated this process in 2021.

Spoofed Social Media Account

We also found that while FCA had not increased its social media usage to include Instagram, there appeared to be a spoofed account on Instagram that was using the FCA logo and information. The account posted images and information attempting to represent the Agency and linked to a dating site. The Agency was unaware of the spoofed account during our review.

The Agency’s Privacy Impact Assessment for social media addresses the risk that individuals may set up a third-party social media site and claim it to be an official FCA social media presence. To negate these false sites, the Privacy Impact Assessment states that all Agency social media sites have been appropriately branded. It also notes that this branding allows the public to know that this is an official FCA social media presence, and that they can trust the information. However, this example shows the shortfall of that approach being that someone can copy the Agency’s branding. This also emphasizes the importance of periodically monitoring social media accounts.

Social Media Disclaimers

FCA’s social media accounts do not contain disclaimers presented in Agency policy. Implementing procedures in PPM 205 state that, “All official profiles must include a disclaimer based on Office of Management and Budget policy and the negotiated Terms of Service. The disclaimer should read as follows: Comments and images posted by the public do not necessarily represent the views of FCA. If you are looking for official FCA information, please go to www.fca.gov.” However, FCA’s accounts do not have the stated language or other disclaimers.

Controls over External Communication

FCA had implemented certain controls over external communication. For example, officials stated that notifications are generated when FCA is mentioned on social media accounts, which aids in monitoring information relating to the Agency. In addition, the FCA website included required content. FCA also redesigned the website in 2018 to modernize, strengthen, clarify, and enhance the site for readers.

However, we identified controls over certain external communication processes that needed to be updated, implemented, and improved. Controls help ensure the consistency and accuracy of FCA’s external communication by allowing only those with authority to post content on behalf of the Agency in an approved manner.

Approval Process for Social Media Posts

The approval process for social media posts was not fully documented and was inconsistently applied. In general, the process for creating social media content includes creating and staging the content, providing the content to OGC for approval, receiving final clearance from OCPA, and posting the content to social media. OCPA procedures covered posting on Facebook and Twitter; however, procedures for LinkedIn and YouTube were not documented. In addition, OCPA policies and procedures did not address:

- the approval process for “liking” posts from the FCA social media account,
- retweeting⁶ and responding to tweets or other social media posts,
- when social media posts need office director approval or involvement, and
- the individuals or positions that have the authority to post on social media.

To determine whether OCPA received approvals from OGC and OCPA leadership for social media posts, we judgmentally sampled posts, retweets,⁷ and responses⁸ to tweets⁹ from FCA’s Facebook and Twitter accounts. We found inconsistencies with the social media approval process. Specifically, in our sample, we found that documentation was not provided showing approvals were received before release for the following:

- 2 out of 16 posts lacked evidence of OGC approval.
- 10 out of 16 posts lacked evidence of OCPA approval.
- 8 out of 8 retweets lacked evidence of OGC approval.
- 7 out of 8 retweets lacked evidence of OCPA approval.
- 6 out of 6 Twitter responses lacked evidence of OGC approval.

Officials stated that posts that are part of the ordinary course of business are approved by the OCPA Deputy Director and other posts are approved by the OCPA Director. However, this process was not documented. In addition, officials stated that OCPA approval for certain postings and retweets was provided orally or by instant messenger. However, we could not verify those approvals because OCPA did not retain the approval documentation. Officials stated that OGC approvals were missing because the assigned attorney was out of the office. In addition, OCPA officials stated that there was a verbal agreement with the previous OGC approving official that retweeting or responding to tweets did not require OGC approval. However, this process was not documented.

⁶ A retweet is defined as a forwarding of a tweet.

⁷ We classified a retweet as those instances where FCA reposted a tweet.

⁸ We classified a Twitter response as those instances where FCA responded in Twitter to a posting.

⁹ We judgmentally sampled social media postings from Facebook and Twitter made between January 1, 2021 and December 31, 2021 and approvals of postings by OGC and OCPA. Because the sample was judgmental, it cannot be projected to the population.

Access to FCA Social Media Accounts

OCPA needs to improve controls over access to login information for FCA official social media accounts. OCPA policies and procedures did not designate those individuals with access and authority to post on social media. There were two people in OCPA who maintained the social media accounts. Although not officially documented, OCPA officials stated that there were three other FCA employees with authority to post on certain social media accounts given their role in the Agency. In addition, PPM 205 states that passwords for an official account must be unique to that account, the creator of each page must maintain a password that is distinct from his or her agency password, and passwords must be changed on all social media channels every 180 days for security purposes.

However, account information is not secured in accordance with PPM 205. The draft OCPA procedures manual includes the shared username for all social media accounts and states the location of a document with social media passwords on a shared drive. The password document is located on a shared drive where multiple people have access to the information. To test accesses, we requested and reviewed a listing of all employees with access to the shared drive where the login information is stored. The two OCPA personnel that maintain the social media accounts were on the listing, but there were 13 additional FCA employees that have access to the login information that do not have the authority to post on FCA social media accounts. Additionally, an OCPA official stated that the social media passwords are only changed when someone that previously had access leaves the Agency. Not officially documenting those individuals with access and authority to post on social media, storing password information where it is accessible to those without access privileges, and not changing the password information decreases the security of FCA social media accounts.

FCA.gov Website

OCPA procedures did not fully document processes for the maintenance and security of the Agency's website. FCA's PPM 202, *FCA Publications and World Wide Web Homepage Policy*, outlines that OCPA has final approval authority for content. However, the PPM is one page in its entirety, was issued in 1998, and does not have detailed procedures on website content approvals, maintenance, or security. Additionally, the draft OCPA procedures manual addresses the process for updating subscriber lists and changing content, but it does not outline website controls. Missing items include roles and responsibilities between the various FCA offices and the contractor that is used for website updates and government compliance requirements.

Other than the need to update PPM 202, we found no exceptions in our testing of certain website requirements. OMB Memorandum M-17-06, *Policies for Federal Agency Public Websites and Digital Services*, states that Federal websites and digital services should always meet and maintain high standards of effectiveness and usability and provide quality information that is readily accessible to all. We performed testing on certain requirements from OMB M-17-06 for searchability, privacy, security, and required links to specific information. All tested elements were included on FCA's website. We also tested accesses to determine who could modify the FCA website. Accesses were limited to appropriate personnel.

Records Maintenance

We found that OCPA needs to improve the recordkeeping process for social media content. The Federal Records Act generally defines Federal records as any material that is recorded, made, or received in the course of Federal business, regardless of its form or characteristics and is worthy of preservation. FCA's PPM 205 addresses records maintenance requirements for social media stating, "if social media applications are used to conduct Agency business, employees are responsible for capturing the 'record' content and maintaining it for the appropriate retention period in an official FCA record-keeping system." OCPA manages social media posts in a document on an internal shared drive. However, the document did not always match what was posted and included working draft notes and posts that were not published on the FCA accounts, which can cause confusion on what is considered the official record. We also noted the social media records did not include copies of posted videos. OCPA needs to work with Agency records management personnel to improve this retention process.

Root Causes

We identified several root causes for weaknesses in the Agency's external communication policies and practices that, if addressed, will improve the effectiveness and efficiency of FCA's external communication process.

Social Media Strategy

When FCA planned to extend its social media presence in 2018, a recommended strategy was outlined that discussed social media usage, objectives, potential audiences, risks, and evaluation measures. The recommended strategy noted OCPA would evaluate the success of social media platforms by measuring growth, reach, engagement, and sentiment.¹⁰ The strategy explains that OCPA will monitor these metrics through measurements such as:

- number of followers/likes we have and how much it's growing quarterly;
- relevance and type of followers, subscribers and people who like/follow us;
- number of web traffic referrals from social media accounts to our website content;
- feedback from followers; and
- number of retweets.

OCPA has the ability to pull up social media statistics from its social media accounts. FCA's website contractors provide OCPA with monthly and weekly reports on social media traffic. It was also noted in the social media proposal that after Twitter and Facebook accounts were created, OCPA and the Social Media Workgroup would publish at least once a week for a 6-month period on

¹⁰ The strategy defines growth as being determined by the number of friends, followers or likes. Reach is the amount of people exposed to content, including content that is shared. Engagement includes the number of interactions, their quality, and the influence of those that are engaging. Sentiment is a qualitative analysis of whether interactions are positive, negative, or neutral.

these new platforms. After this period, a review process will be held. However, OCPA personnel stated that this review did not take place.

Four years have now passed since FCA began increasing its social media presence, but FCA has not fully analyzed the use of social media accounts to understand how to optimize utilization and extend the reach of the messaging. In addition to measuring the growth, reach, engagement, and sentiment through the metrics set forth above, the Agency could evaluate content to reach more followers, posting frequency, results from activities on FCA's social media sites with the social media content and activity of other federal financial regulatory agencies, and new social media tools and platforms.

Policies and Procedures

FCA has not designed and implemented comprehensive external communication policies and procedures. For example, two policies that relate to external communication processes, PPM 202, *FCA Publications and World Wide Web Homepage Policy*, and PPM 201, *Information Release Policy*, were both issued in 1998. The policies lack specificity on the roles and responsibilities relating to external communication processes and the current control structure. OCPA policies and procedures also describe processes that are not being implemented. For example, PPM 205, *Policy for Official Use of Social Media*, describes roles and responsibilities for FCA's Social Media Council (Council) to maintain and monitor FCA's social media profiles. However, the Council has not met since the social media profiles were established. Controls delegated to the Council in PPM 205 included the following:

- Council staff who maintain and monitor FCA social media profiles must commit time and resources to establish a profile or channel, moderate comments from the public, maintain security standards, and ensure compliance with Section 508 of the Rehabilitation Act of 1973.
- The Council will develop guidelines that address the process, best practices, and technical specification for social media.
- Responsible Council members must establish controls over FCA social media sites to ensure federal records are being captured and contact the FCA Records Officer for assistance determining record status.

Not documenting roles and responsibilities may have contributed to certain issues noted in our inspection. For example, documented monitoring processes may have revealed unverified accounts, spoofed accounts, shared and unchanged passwords, and missing disclaimers. In addition, the OCPA procedures manual is a draft from January 2021 that has not been finalized and lacks details on approval processes, involvement with other offices such as OGC and OIT, access controls, and website maintenance and support requirements.

Impact

External communication is important to ensure the Agency effectively provides information to outside audiences to achieve its mission. An effective external communication program and

strategy supports consistent, timely, and accurate information sharing. Because communication methods and channels are evolving quickly, it is important for the Agency to understand current tools and reach relevant stakeholders. The recommendations set forth below are aimed at improving the Agency's use of social media tools, strengthening controls, and improving documentation.

Recommendations

To enhance the external communication process:

1. The Office of Inspector General recommends the Office of Congressional and Public Affairs analyze the use of social media accounts to understand how to optimize content and extend the reach of the messaging.
2. The Office of Inspector General recommends the Office of Congressional and Public Affairs pursue verification of the Farm Credit Administration Twitter and Facebook accounts.
3. The Office of Inspector General recommends the Office of Congressional and Public Affairs, in coordination with applicable offices, document social media processes to include:
 - approval processes,
 - monitoring responsibilities,
 - required disclaimers,
 - password protection, and
 - records retention.
4. The Office of Inspector General recommends the Office of Congressional and Public Affairs, in coordination with other applicable offices, document website procedures that include roles and responsibilities for website maintenance and security.
5. The Office of Inspector General recommends the Office of Congressional and Public Affairs update and finalize the Office of Congressional and Public Affairs procedures manual.

FCA Response

Management partially agreed with recommendation 1. Management agreed to use the social media accounts to strengthen our recruiting efforts, develop posts highlighting the mission and history of the Farm Credit System and FCA, and ensure FCA social media accounts follow System institution social media accounts to promote supported posts.

FCA Management agreed with recommendations 2-5. Management stated it would continue to pursue verification for the Twitter and Facebook accounts. Management also agreed to document social media processes and website procedures and finalize the OCPA procedures manual.

Management's estimated completion date for corrective actions is October 2022.

OIG Response

The OIG finds the actions responsive to the recommendations. Although the Agency only partially agreed to recommendation 1, the actions are responsive to the intent of the recommendation and the findings. The provided responses for recommendations 2-5 also address the findings.

Management comments can be found in the subsequent section. Management waived an exit conference.

MANAGEMENT COMMENTS

Farm Credit Administration

1501 Farm Credit Drive
McLean, VA 22102-5090
(703) 883-4000



July 27, 2022

To: Wendy Laguarda
FCA Inspector General

From: Mike Stokke, Director
Office of Congressional and Public Affairs

Subject: OCPA's response to the OIG's draft report on its inspection of the agency's external communication process

This memorandum responds to the July 7 draft report from the Office of the Inspector General on its inspection of the Farm Credit Administration's external communication process. The objective of the inspection was to determine whether FCA has an effective and efficient external communication process.

As a result of its inspection, the OIG issued five recommendations. Following is OCPA's response to each recommendation.

Recommendation 1: The Office of Inspector General recommends the Office of Congressional and Public Affairs analyze the use of social media accounts to understand how to optimize content and extend the reach of the messaging.

We partially agree with this recommendation. OCPA management intentionally developed and maintains a limited social media program. Our goal is to focus on messaging that relates directly to the mission and history of the agency and the Farm Credit System.

We agree that this inspection report identified areas where we can improve our social media program. We appreciate the OIG's careful inspection and look forward to improving our program further by more thoroughly documenting our processes and using social media platforms to distribute more content related to the mission and history of the agency and the Farm Credit System.

Recommendation 2: The Office of Inspector General recommends the Office of Congressional and Public Affairs pursue verification of the Farm Credit Administration Twitter and Facebook accounts.

We agree with this recommendation. We have already begun pursuing verification of both our Twitter and Facebook accounts.

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Recommendation 3: The Office of Inspector General recommends the Office of Congressional and Public Affairs, in coordination with applicable offices, document social media processes to include:

- *approval processes,*
- *monitoring responsibilities,*
- *required disclaimers,*
- *password protection, and*
- *records retention.*

We agree with this recommendation. We will document our approval processes and our monitoring responsibilities. We will also insert any necessary disclaimers. We have already shored up our password security and will document the steps necessary to maintain security going forward. Also, we will be working with the agency's records official to ensure that we have a process for efficiently retaining permanent records.

Recommendation 4: The Office of Inspector General recommends the Office of Congressional and Public Affairs, in coordination with other applicable offices, document website procedures that include roles and responsibilities for website maintenance and security.

We agree with this recommendation. We will coordinate with the Office of Information Technology to ensure that we are documenting website procedures correctly. We will also clarify who is responsible for particular tasks.

Recommendation 5: The Office of Inspector General recommends the Office of Congressional and Public Affairs update and finalize the Office of Congressional and Public Affairs procedures manual.

We agree with this recommendation. We will update and finalize our procedures manual.

Thank you for the opportunity to respond to these recommendations. We look forward to using your feedback to improve the agency's social media program.

ACRONYMS AND ABBREVIATIONS

Agency	Farm Credit Administration
Council	FCA's Social Media Council
FCA	Farm Credit Administration
OCPA	Office of Congressional and Public Affairs
OGC	Office of General Counsel
OIG	Office of Inspector General
OIT	Office of Information Technology
OMB	U.S. Office of Management and Budget
PPM	Policies and Procedures Manual
System	Farm Credit System



Farm Credit Administration
Office of Inspector General

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