Social Media Audit California Polytechnic State University, San Luis Obispo Audit Report 23-2 September 26, 2023

EXECUTIVE SUMMARY

OBJECTIVE

The objective of this audit is to ascertain the effectiveness of campus operational and administrative controls pertaining to Cal Poly's University Communications and Marketing (UCM) Social Media process to ensure compliance with relevant policies and best practices guidance.

SCOPE

The scope of this audit primarily relates to Cal Poly's UCM policies and best practices guide set as they relate to all departments and auxiliaries on campus.

The Social Media Audit scope encompassed the following platforms: LinkedIn, X (formally known as Twitter), Facebook, Instagram, Google+, YouTube, and Pinterest listed on the social media directory as of 6/1/23. Audit and Consulting Services (ACS) noted that the social media directory on that date included 284 "official" Cal Poly social media sites from various departments across the University and its auxiliaries. "Official" sites are defined as social media accounts that have been added to the Cal Poly Social Media Directory subsequent to a review process completed by UCM for the purposes of this audit.

ACS completed the following procedures for 46 social media samples selected for testing:

- Accessibility to the links
- Consistency in branding (i.e., naming conventions, graphics, logos, etc.)
- Verify that the tone/intent of the site is aligned with Cal Poly's University strategy
- Social media activity

In addition, ACS sent surveys to the 18 departments to obtain an understanding of how the social media sites selected as part of this audit are managed and monitored. The survey topics included:

- Access roles
- Password management
- Metrics tracking

- Content posting process
- Use of the Social Media Guidelines provided by UCM

CONCLUSION

Social media plays an important role in Cal Poly's UCM strategies as it provides an opportunity to engage with prospective and current students, parents, alumni, and potential donors. The University's social media presence is currently decentralized and spans across all divisions, auxiliaries, colleges, departments, student groups and leadership positions utilizing multiple sites. UCM is staffed with one individual to carry out the majority of the social media tracking, training, and communication on campus.

Given the current environment, there are growing concerns about social media relating to data protection and privacy, false news, and disinformation, and cybersecurity threats. New social networks and digital platforms emerge with increasing speed. With the popularity of social media, almost all new online platforms include some social feature. These factors exacerbate the risks and opportunities associated with such channels of communication.

UCM has created a centralized social media directory, however, the directory is only a subset of campus's social media presence. The total number of Cal Poly affiliated social media sites is unknown. The audit acknowledges the inherent challenges in centrally managing the large number of social media sites while ensuring that Cal Poly's brand and content are conveyed coherently across the diversity of audiences, contexts, and themes portrayed in the over 284 official sites. As such, for sites that are listed on the directory, UCM has established as set of policies and best practices for the use of social media (i.e., branding information, posting frequencies, user access, etc.). However, adherence to the social media policy and best practices over the disaggregated landscape needs improvement. Further, ACS noted that additional policy direction and standards are needed to set clear expectations for appropriate behavior and to ensure social media activities do not expose Cal Poly to legal, reputational, or other risks.

Ability to centrally monitor social media activity adequately would decrease the risk of exposure of fake or unauthorized accounts that can be damaging to the reputation of the University. Lack of site functionality (i.e., broken links or listed deactivated accounts within the directory), will ultimately result in missed opportunities to maximize the impact of social media among key target audiences and to increase Cal Poly's visibility in promoting the school's brand. Further, the audit noted that various sites or handles, although approved or recognized by the University, did not necessarily fit the context of Cal Poly's brand or the audience platform preference. The use of metrics and monitoring capabilities of these social media platforms could be improved for consistency as social media is shifting towards having more impact on the impressions of followers and engagement. Also, additional training and support for employees who manage social media accounts should be given regarding account management (i.e., social media tools available for use, password security, administrative roles, etc.).

Specific observations, recommendations, and management responses are detailed in the remainder of the report.

OBSERVATIONS, RECOMMENDATIONS, AND RESPONSES

1. DECENTRALIZED STRUCTURE OF SOCIAL MEDIA

OBSERVATIONS

There is not a centralized listing of all Cal Poly Social Media accounts. The ones included on the official directory is only a subset of the total number of Cal Poly affiliated social media accounts. Currently, there is no process in place to centrally monitor the social media landscape for the University. As such, the assessment process and monitoring frameworks require strengthening.

ACS noted that departments are provided social media guidelines by UCM, however, adherence and ability to carry out the guidelines was inconsistent amongst the various campus departments and groups. As a result, University-wide strategies and policies were not consistently applied and left to the discretion of the social media site owners. In some cases, departments demonstrated meeting or exceeding the guidelines set UCM while other departments indicated that they had no formal structure or guidelines in place to operate social media accounts.

Decentralized accounts can lack appropriate governance to be fully effective. In some cases, social media expertise was not adequately coordinated with business and organizational knowledge and needs. There is room for improvement in the strategy formulation and execution process to give relevant stakeholders an opportunity to best use their social media platforms.

RECOMMENDATION

ACS recommends creating a more robust and effective oversight of the social media landscape. UCM should review the current social media reporting and campus partnership structure and identify efficiencies that can be made to better carry out the goals and objectives set out by the department. This may include, but not limited to, identifying individuals within the colleges and departments to be a point of contact that can help monitor and track social media accounts that are currently listed or not listed on the social media directory. Those individuals identified should be reminded at least annually of social media best practices and policies. Further, UCM should consider developing and implementing a self-reporting process in conjunction with campus partners by which social media site owners can report on the status of their social media site(s) and social media practices. Reporting should be required at minimum of an annual frequency and should include the following:

- Tracking and compliance attributes that would allow UCM to properly assess if the purpose, functionality, and impact of the relevant social media sites align with policies and best practices
- Enforcement mechanisms should be implemented to ensure the quality and effectiveness of the social media content and adherence to the guidelines. Enforcement mechanisms may include, but not be limited to, removing links from the social media directory or unfollowing/ removing tags from the "official" Cal Poly accounts
- Assessment of department operations and structure to determine if the department has sufficient resources to maintain social media accounts to the standards set out by the guidelines. For departments that do not have adequate structure in place to maintain and monitor social media activities, UCM should recommend if it would be best to partner with UCM or other marketing groups to help manage their social media accounts or be provided additional guidance and training
- Include formal acknowledgements of the department/ owner's responsibilities for the management and stewardship of the social media accounts that are both officially on and off the social media directory

MANAGEMENT RESPONSE

We concur. Some elements of this recommendation are achievable under the currently implemented model and staffing levels (and, indeed, already exist in a more unofficial capacity within UCM's Social Media Community of Practice and less formal discussions with college- and division-level communicators and social media practitioners). UCM will review the current social media reporting and campus partnership structure and identify efficiencies that can be implemented to better carry out the goals and objectives set out by the department. This includes identifying individuals within the colleges and divisions to be a point of contact that can help monitor and track social media accounts that are currently listed or not listed on the social media directory. Identified individuals will be included in the online social media directory. Those identified individuals will be done through the UCM social media community of practice and in one-on-one meetings with identified communicators. Although this activity occurs in a more informal way already, UCM will more explicitly codify this in the community of practice and in our social media guidelines provided to all campus communicators.

UCM concurs that the recommendation to implement more direct oversight of social media university-wide would serve to create greater consistency in terms of content and appearance of social media pages and accounts associated with the university. As such, UCM considered developing and implementing a self-reporting process in conjunction with the campus partners by which social media site owners can report on the status of their social media site(s). However, UCM is a leanly staffed division overall, and particularly in social media. Currently, one FTE is dedicated to content creation within the university's umbrella accounts as well as general monitoring of the university's trending and reputation and sharing expertise with and helping to guide communicators and others tasked with social media work throughout the campus. Direct oversight of accounts and pages campus wide is not feasible for this single FTE position and the university's currently decentralized marketing and communications model. UCM acknowledges that there may exist some risks in not implementing the recommended self-reporting oversight model and accepts the risk as they currently stand.

Nevertheless, fully implementing the recommendation as stated is not achievable due to the decentralized model of communications and marketing under which the university currently operates and UCM's current staffing levels.

All other elements of this recommendation — namely, implementing mechanisms whereby UCM will assume direct oversight and enforcement of pages and accounts throughout the university — fall outside of UCM's capabilities given.

Anticipated implementation date is May 31, 2024

2. SITE FUNCTIONALITY

OBSERVATIONS

Identified eight links out of 46 reviewed that were not working due to a broken link, discontinued site, or a closed account.

ACS notes that between the date of fieldwork and the issuance of the report, UCM updated the social media directory. As part of the update, some known deactivated accounts were removed from the directory (two out of the eight noted above). The deactivation of the accounts was due to vendor termination of service (Google+) and by the department, respectively.

RECOMMENDATION

ACS recommends that UCM identify all social media accounts within the social media directory that include a broken link, discontinued site, or a closed account, and remove the accounts from the directory. Subsequent to removing the site links, UCM should establish an appropriate frequency by which all sites be reviewed for proper functionality. In

addition, all sites identified as not working during this audit should be properly discontinued and removed from the list of Cal Poly 'official" sites.

MANAGEMENT RESPONSE

We concur. The directory is not currently up to date and that the current university wide scope of the directory is untenable given our division's staffing and the decentralized nature of the university's marketing and communications model.

Going forward, as we update the Social Media Directory website, we will focus the directory on higher-level accounts — university, division, college, auxiliary, and other major offices and departments (e.g. police/public safety and Athletics). These are accounts that UCM shares and collaborates with often. If a division, college or department has smaller channels under their umbrella, each point of contact should maintain a list of those accounts and their information. This will significantly lower the number of and potential for discontinued accounts and links featured on the UCM umbrella page and will create a more efficient and manageable system for our small team to review and monitor for site proper site functionality. In addition, for all accounts that will be removed from the Social Media Directory website, UCM will ensure proper offboarding communication is performed to refresh the site owners on all required policies, as well as inform them about the results of this audit and that going forward, they are now responsible to ensure compliance with all policy requirements.

Anticipated Implementation date: May 31, 2024

3. UNIVERSITY INFORMATION

OBSERVATIONS

ACS reviewed 38 working social media sites to ensure University-related information was compliant with relevant marketing policy and noted the following:

- 25 sites allowed the use of handles and ACS identified that:
 - Six (or 24%) were non-compliant with the naming convention included in the Social Media Best Practices Policy as they included underscores and the use of "CP" (not spelled out), which prevents easy search or creates an idea of less legitimacy for the viewer
 - Five (or 20%) YouTube sites and two (or 8%) Pinterest sites, for which there is no direction in the Social Media Best Practices and Policies, including proper naming guidelines for the handle

- Five (or 13%) did not follow the Brand Platform & Position Policy as the content did not communicate the brand pillars. However, ACS also noted that the policy does not have clear direction on how the brand pillars should be included in a social media site and examples of what is required would be easier for social media sites to follow.
- One (or 3%) did not follow brand consistency guidelines by not using the name of Cal Poly correctly (case identified used "Cal Poly SLO" to identify the University)

RECOMMENDATION

ACS recommends that UCM coordinate with respective social media site administrators to address the issues identified as part of the audit and reiterate the policies and best practices pertaining to corporate information. Further, UCM should develop a plan to review all active sites to ensure they are currently compliant with the required naming convention per policy. In addition, an appropriate frequency should be determined to implement a continuous check going forward. For naming conventions that are not compliant with the policies and/or best practice guide, UCM should coordinate with the respective departments to assess this risk of keeping the current naming convention versus creating a new handle and document the determinations appropriately.

The Social Media Best Practices Policy should be updated to include all platforms currently used by the Cal Poly owned social media sites (e.g. YouTube and Pinterest). The Brand Platform & Position Policy should be updated to include clear directions and examples on how to include the required mention of the brand pillars. Any policy update should include examples for all types of social media sites currently supported. Once the policy is updated, this should be communicated on an annual basis to all sites administrators. Finally, UCM should determine an appropriate frequency to implement a continuous check on this requirement going forward.

MANAGEMENT RESPONSE

UCM concurs with portions of this recommendation:

- UCM will coordinate with college- and division-level social media site administrators through the UCM social media community of practice in order to address the issues identified as part of the audit and reiterate the policies and best practices pertaining to corporate information.

The Social Media Best Practices Guide is currently being updated to include all platforms our departments utilize. Once completed, the guide will be distributed to the respective social media contacts on an annual basis.

All other elements of this recommendation — namely, implementing mechanisms whereby UCM will assume direct oversight and enforcement of pages and accounts throughout the university — fall outside of UCM's capabilities given staffing limitations and the university's

decentralized marcomm model and will not be implemented at this time. As stated in Recommendation Response 1, UCM acknowledges that there are certain risks associated with this approach.

Anticipated Implementation date of accepted items: May 31, 2024

4. COMMUNICATIONS & MARKETING BRAND GUIDELINES

OBSERVATIONS

ACS reviewed the 38 working social media sites to ensure Brand Guidelines were followed and noted the following:

- 35 sites had content where Style Guide Guidelines were applicable, and four (or 11%) were not fully compliant with the guide. Examples of issues identified included: capitalization of competition name, department names, and building names related to donors
- 35 sites had logos that ACS reviewed to be compliant with the Logo Policy and 23 (or 66%) did not use an approved logo. Examples of issues identified include sites using their own logo, using a photo, incorrect color variation or logo lockup, and use of University seal.
- 33 sites had logos that ACS reviewed to be compliant with the Color Guidelines and seven (or 21%) were not using approved colors.
- 25 sites used graphic elements that ACS reviewed to be compliant with the Graphics Guidelines and 13 (or 52%) were not using an approved background graphics

RECOMMENDATION

ACS recommends that UCM coordinate with respective social media site administrators to address the issues identified as part of the audit and reiterate the policies and procedures pertaining to communication and marketing guidelines. Further, UCM should develop a plan to review all active sites to ensure all are currently compliant with Brand Guidelines and address any issues identified with the corresponding site administrator to provide a reminder of the policy. Also, an appropriate frequency should be determined to implement a continuous check going forward.

MANAGEMENT RESPONSE

UCM concurs with portions of this recommendation:

UCM will coordinate with respective college- and division-level social media administrators (through the UCM social media community of practice) to address the issues identified in the audit and reiterate the policies and procedures pertaining to communication and marketing guidelines. UCM will ask these administrators to in turn reiterate these issues and policies/procedures with department-, office- and program-level administrators within their respective areas.

As with previous recommendations, portions of this recommendation urging UCM to take on direct review, oversight and enforcement of accounts and pages university wide are not feasible given current staffing levels and the university's decentralized marcomm model and will not be implemented at this time. UCM acknowledges that there are certain risks associated with this approach.

5. PROFILE PERFORMANCE AND POSTING STRATEGY

OBSERVATIONS

Out of the 38 working social media sites, 13 (or 34%) had not posted any content in the previous month. Per review of these 13 sites, noted that periods of no activity were as follows:

- Five had no activity between one to six months
- Three had no activity between six months to one year
- Five had no activity between 18 to 42 months

Furthermore, ACS reviewed each site against the recommended posting strategy and noted the following non-compliance:

- Four (or 50%) of the eight Facebook sites did not post a minimum of once per week
- Four (or 57%) of the seven Instagram sites did not post a minimum of twice per week
- Three (or 60%) of the five LinkedIn sites did not post a minimum of bi-monthly
- Nine (or 82%) of the 11 X accounts did not post a minimum of once per day

Noted there was no guidance in the Social Media Best Practices on posting strategy for the YouTube or Pinterest platforms. ACS noted that out of the 38 working social media sites reviewed, there were a total of seven (or 18%) YouTube and Pinterest accounts

Per the surveys sent to the departments, three social media accounts listed on the directory are currently not in use or are in the process of being deactivated. Per the respective departments, two out of the three accounts are being deactivated due to a change in social media/business strategy. The accounts posted directly on the sites indicating that the site and related information will be moving to an already established site within the department to streamline messaging and communication.

RECOMMENDATION

ACS recommends that UCM coordinate with respective social media site administrators to address the issues identified as part of the audit and reiterate the best practice guidelines for profile performance and strategy. In addition, UCM should develop a plan to review all active sites to ensure compliance with the Posting Strategy Guideline and address any issues identified with the corresponding site administrator. Finally, an appropriate frequency should be determined to implement a continuous check going forward.

The Posting Strategy Guideline should be updated to include guidance for all platforms currently supported (e.g. YouTube and Pinterest). Once the policy is updated, this should be communicated on an annual basis to all sites administrators.

MANAGEMENT RESPONSE

UCM agrees with and will implement portions of this section's recommendations, including:

- UCM will coordinate with respective social media site administrators to address the issues identified in the audit and reiterate the best practice guidelines for profile performance and strategy. Implementation anticipated by May 31, 2024.

The Posting Strategy Guideline will be updated to include guidance for all platforms currently supported (e.g. YouTube and Pinterest). These changes will be communicated on an annual basis to the college- and division-level site administrators in UCM social media community of practice. UCM will ask these administrators to in turn reiterate these posting strategies and best practices with department-, office- and program-level administrators within their respective areas. Implementation is anticipated by May 31, 2024.

 In addition, UCM should develop a plan to review all active sites to ensure compliance with the Posting Strategy Guideline and address any issues identified with the corresponding site administrator. Finally, an appropriate frequency should be determined to implement a continuous check going forward.

As with previous recommendations, portions of this recommendation urging UCM to take on direct review, oversight and enforcement of accounts and pages university wide are not feasible given current staffing levels and the university's decentralized marcomm model and will not be implemented at this time. UCM acknowledges that there are certain risks associated with this approach.

Anticipated implementation date of accepted items: May 31, 2024

6. METRICS TRACKING AND PROCESS TOOLS

OBSERVATIONS

Monitoring and performance measurement lacked an overarching and consistent coordinating framework. Advanced reporting was only leveraged for some channels and social media use cases, resulting in tactical rather than strategic decision making. There are various different ways in which the campus tracks the metrics for the social media sites. Various department utilize different techniques including internal metrics, using metrics provided by the social media site, or utilizing 3rd party vendors (i.e., Sprout Social) to complete metric assessments. Of the 18 departments reviewed, ACS identified three that used 3rd party vendors, nine departments that used internal metrics or the metrics from the social media platform and six departments indicated that they did not use any metrics.

RECOMMENDATION

ACS recommends that UCM communicate the benefits of utilizing these 3rd party platforms to respective departments to assist in the management of their social media platforms in addition to tracking metrics. Further, UCM should assess the possibility of providing access to the tools to other departments to have a comprehensive understating of the statistics and user engagement. The statistics can be used to help departments make strategic decisions for their social media accounts and communications.

MANAGEMENT RESPONSE

We concur with this recommendation. UCM's social media coordinator regularly discusses these matters in both one-on-one and group meetings with campus partners (including through the UCM social media community of practice). UCM will continue to discuss the benefits of third-party software that can be used to help measure success and track analytics. However, given the decentralized nature of the university's social media landscape, individual divisions, departments and offices would be responsible for purchasing or subscribing to such software and would need to absorb the associated costs themselves.

Anticipated implementation date is May 31, 2024

7. PERSONAL ACCOUNTS

OBSERVATIONS

The audit observed several instances where personal accounts were used for organizational purposes. ACS noted that 'personal' accounts, such as the President's account and the VP of Student Affairs accounts, utilized the individual's name per the account versus the positions of the individual. This presents a risk of continuity of the social media accounts for these positions if the individual would leave the University. Further, there is no use of disclaimers within the personal accounts.

ACS also noted that there are departments that allow editing and administrative rights to their social media pages through adding users per their personal accounts (i.e., Facebook). By this action, social media platforms may blur the line between personal and official accounts. However, the misuse of these platforms by individuals can also easily create harm to Cal Poly's brand, reputation and trust. There are not any disclaimers for the personal accounts accounts noted.

Lastly, ACS noted one instance where a personal LinkedIn account is listed within a social media account. The personal account does not align with the business purposes of the University and was noted as being used for job postings from various companies versus communications from the University.

RECOMMENDATION

Due to Cal Poly's current decentralized management model, stronger policy direction and standards are required to set clear expectations for appropriate social media behavior by users, and to monitor and mitigate the risk of user activities that may potentially expose Cal Poly to legal, reputational, or other risks. ACS recommends considering for other positions that have their own social media account, utilizing independent handles so at the end of the individual's tenure, there will be minimal loss of networks and connections. The creation of institutional accounts for representative roles will ensure organizational benefits are not lost and to help mitigate the risk associated with the use of personal accounts.

Roles and responsibilities should be outlined in available strategy documents for individuals who use their personal account (for example, being mindful that their personal account is affiliated with a Cal Poly social media account). Further, actions should be monitored by the respective department.

UCM should create and communicate guidance for personal accounts to include disclaimers within their social media accounts. These disclaimers should include a statement for these accounts to note that the opinions presented in the site are on behalf of themselves and do not intend to portray such as the University's opinion. In addition to this guidance, UCM should continuously monitor content within their regular traffic control checks (frequency and scope to be determined by UCM) to ensure personal messages are not viewed as the University's voice and that there is no posting of inappropriate content.

MANAGEMENT RESPONSE

UCM concurs with a portion of this section's recommendations:

- Guidance around page roles and access are currently outlined in our Social Media documents, and specifics around the President and Vice Presidents naming will be added and shared with college- and division-level administrators through the UCM social media community of practice. Sitting administrators would not be required to change their social media account names, as doing so could negatively impact their established accounts. However, updated requirements will be applied for new-hire administrators and others going forward. Implementation is anticipated by May 31, 2024.

Other portions of this section's recommendations are not within UCM's purview or scope and authority or are not achievable with current staffing limitations and the university's marcomm model, and they will not be implemented at this time. They include:

- The university can offer suggestions on personal social media accounts; however, attempting to mandate how individuals how run their personal accounts could create a First Amendment concern and carries its own potential legal and public relations risks.
- As with previous recommendations, portions of this recommendation urging UCM to take on direct review, oversight and enforcement of accounts and pages university wide are not feasible given current staffing levels and the university's decentralized marcomm model and will not be implemented at this time.

UCM acknowledges that there are certain risks with this approach.

Anticipated implementation date for accepted items: May 31, 2024

8. PASSWORDS AND SECURITY

OBSERVATIONS

Password management is inconsistent for the various social media platforms within the departments. ACS noted the following within the surveys:

- Passwords are stored in more than one location and/or social media page grants access administrative privileges through social media accounts (4)
- Department was not aware of the process/locations of where the passwords were stored, or did not know the passwords for the account (1)
- Department does not use a password management system to safeguard passwords (18)

• Department indicated that their department utilizes LastPass or Single Sign On to assist in password management (6)

There is inconsistent frequency of when a password change is completed as noted below:

- Departments indicated either a multi-year (2), annual (17), semi-annual (1), or quarterly frequency (2)
- As needed or when employee leaves (5)
- Could not determine due to department not knowing the password of the social media account or social media account is personal and not shared with other members of the team (11)

There is no formally documented process in place to report security breaches or guidance on how departments should handle security breaches or cyber-attacks. ACS noted there was one department who indicated they were hacked during the audit period.

RECOMMENDATION

ACS recommends that UCM communicate to the relevant social media account owners the importance of strong password management. Further, UCM should promote the use of enterprise password managers, such as LastPass, that is accessible for all faculty and staff members or platform specific multi-factor authentication. In addition, UCM should remind users of the 'IT Security Standard for Cal Poly Passwords" and the 'IT Responsible Use Policy' for additional guidance on password management, data protection, and responsibilities of the user community utilizing Cal Poly resources or branding.

MANAGEMENT RESPONSE

UCM concurs with this recommendation. UCM will communicate to the relevant social media points of contact the importance of strong password management, including discussing best practices around copyright and software related to social media. Further, UCM will remind contacts and users of the 'IT Security Standard for Cal Poly Passwords' and the 'IT Responsible Use Policy' for additional guidance on password management, data protection, and responsibilities of the user community utilizing Cal Poly resources or branding.

Anticipated implementation date is May 31, 2024

9. ACCOUNTS MANAGED BY NON-CAL POLY EMPLOYEES (FULL TIME EMPLOYEES)

OBSERVATIONS

ACS noted the following regarding accounts managed by non-Cal Poly employees:

- Account is managed by a student organization. ACS notes that the organization does have advisors that are full time employees, however, the account is managed by a student within their club or organization (2)
- Account is managed by a third party, Chartwells Higher Education (1)
- Intermittent employee or student employee within respective department has administrative access to a social media account (2)
- Account includes an administrator that is no longer employed with the University (2)

RECOMMENDATION

ACS recommends that UCM develop additional guidance regarding account management and administrator/editing access to ensure that departments grant and remove access to the appropriate personnel. Further, UCM should coordinate with the respective departments to remediate the issues noted as part of the audit.

MANAGEMENT RESPONSE

UCM concurs with portions of this section's recommendations:

 UCM will share the findings of the audit with college- and division-level administrators through UCM's social media community of practice. As well, UCM will develop additional guidance regarding account management and administrator/editing access to help departments understand both the efficiencies to be gained in abiding by this guidance and the risks associated with not adhering to best practices. Implementation anticipated by May 31, 2024.

Other portions of this section's recommendations fall outside UCM's purview and authority and will not be implemented at this time. UCM acknowledges that there may be certain risks associated with this approach. However, our division lacks the staffing to implement a review mechanism on this issue and, more importantly, does not have the hardline reporting structures in place to require other divisions, offices and departments to adhere to guidance and best practices.

Anticipated implementation date for accepted items: May 31, 2024