



How Aetna Conducts Social Audits & Training to Ensure Compliance

 **SNAPSHOT**

SPEAKER
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COMPETENCIES
Policies & Governance

MATURITY PHASES
CMM1, CMM2, CMM3

SUMMARY

This is an Aetna case study on how to conduct social audits and training for social compliance. The highlights of the discussion are noted below:

1. The foundation of Aetna’s social audit and training program is its governance structure. Prior to the launch of any page/channel by a business unit owner, he/she must prepare a business plan for review. Tara’s team will meet with the business unit owners to ensure that they have thoroughly researched their strategy and that they are prepared to fulfill the necessary work required to keep the social page active and engaging. Strengthening this governance is the fact that Tara and her team have the authority to sunset those pages/channels that do not comply.
2. The social media training is also a strong contributor to compliance success. Aetna’s training consists of three levels:
 - a. White Belt: Social media training 101.
 - b. Green Belt: Online training for community managers and other positions that have access to social media or social channel ownership.
 - c. Black Belt: Training for those individuals involved in strategic social media decisions.
3. A community handbook is a strong resource for business unit owners: The handbook is broken down into several sections, including overall strategy and goals, a description of the audience and who the owner wishes to engage with online. The playbook encompasses the strategies for social listening, for engaging, for mediating and interpreting what people are looking for, along with governance and maintenance. This last piece includes Aetna’s policies and guidelines, the rules and responsibilities of the various people that are involved in social, as well as and the training requirements.

Overview

The highlights of the discussion are noted below:

- **Tara's Background:** Tara is the Senior Project Manager on Aetna's Social Media and Community Management Team. Her primary focus is governance and training.
 - Tara has been working in this position for the past year. She began with Aetna about six years ago working in national accounts. Her previous experience was working on RFPs for large customers like Wal-Mart and Starbucks, i.e. those organizations with 3000 or more employees. As a result, she learned quite a bit about Aetna's products and services, which has served her well when it comes to writing proactive content on social media. As well, this experience has helped her to capitalize on her existing relationships with the business units.
 - Tara did help develop some of the enterprise-wide training with Price Waterhouse Cooper (PwC). PwC has a specific social team that helps large companies with training and development.
 - Compliance is critical for Aetna due to the strict regulations that govern their industry.
- **Overview – Aetna:** Tara shared a brief overview of Aetna's background as a backdrop for the discussion:
 - Aetna is a national health insurance company founded in 1853. It is headquartered in Hartford, Connecticut.
 - Aetna offers several benefit plans, including medical, dental, etc.
 - Aetna acquired Coventry Healthcare about a year and a half ago, raising their total employees to approximately 47,500.
 - Aetna is still in the process of transitioning many of Coventry's members and plans over to Aetna. As a result, they are not fully branded with them yet.
 - Aetna wanted to ensure that they were available for the Coventry members who still had questions about the Coventry Health Plan, so a Twitter handle (@CoventryHelp) was created for those members to contact Aetna.
 - Hillary asked if Coventry had a social presence prior to the acquisition. Tara replied that they did not have a Twitter handle, only a few internal communities. Therefore, they have pretty much started from scratch. This has been beneficial because they are still trying to decide on how to

brand with them. There are still some branded Coventry products/services and these members know that their plan is still Coventry even with the Aetna acquisition. That is all part of the messaging, but they have to wait for business decisions to be made before they can move forward in the social arena.

- Aetna has four corporate channels and several business units. Many of the different business units want to create their own channels, necessitating the need to align these channels with Aetna's corporate presence. It is also vital to ensure that each page or account is healthy and that the content messaging is on brand and frequent. This has prompted the creation of an effective audit system.
- **Aetna's Social Presence:** Tara gave an overview of Aetna's social presence as it stands today:
 - Aetna is currently on four core channels – Facebook, Twitter, LinkedIn and YouTube.
 - Given that Aetna is in a highly regulated industry, social media is fairly new to the organization – roughly three years. It took one year of working closely with legal and compliance to put a governance strategy in place before Aetna could even think about launching in the social space.
 - Aetna joined Twitter in January 2012 with two handles - @Aetna and @AetnaHealth. The first is their corporate handle for thought leadership content. Customers also send messages to that channel, which are monitored through their Salesforce marketing cloud. The primary customer service contact is the second handle. This latter channel receives the bulk of the tweets about claims. Staff monitors this handle 24/7 and aim for a service response within 10 minutes.
 - The other pages were not launched until September, 2013.
 - Aetna posts both organic and paid content and performs AV testing with some of their marketing agencies to work on building their communities and fan base and to learn what content resonates, what products and services customers are looking for, etc. The goal is to educate members about the tools and services that are available to them, especially now during open enrolment. Another goal is to ensure that the corporate insurance jargon is translated into laymen terms.
 - Aetna's corporate Facebook page averages about 1-2 posts per day. Tara's team and corporate communications feed content through this Facebook page. They also respond

to members who choose to engage with the company through this channel, which is the customer service resolution team mentioned earlier. They are responsible for engaging with members, in addition to the community managers.

Best Practices

The following is a summary of the various best practices that emerged from the discussion with members:

- **Develop a Governance Structure:** Tara stated that prior to the launch of the core social channels, Aetna developed a governance structure outlining how employees and authorized representatives (community managers and those who work in corporate communications and PR) could speak on behalf of the company, as well as how they should conduct themselves professionally and personally on the various social channels. There are guidelines for the authorized representatives, as well as general guidelines for all other employees. This year they put a great deal of effort into developing the social media training to loop back to these guidelines and ensure that everyone is aware of them. With 47,500 people, the information needs to be scaled so that everyone has access to it on a daily basis from a legal, brand and risk standpoint. It is essential that everyone fully understands the expectations of how they handle themselves online and the risks to Aetna if they do not handle themselves accordingly.
- **Define Expectations:** Prior to the launch of any page/channel, the business unit owner must be informed of Aetna's expectations:
 - Each business unit owner with a social page or account is responsible for creating a 90-day content calendar prior to launching their channel. This forces the business unit owner to think through what it is that they are trying to achieve with the social page or account. They need to think about their audience, the content that resonates with that audience, etc. They also need to provide that detail to Aetna's Social Media Center of Excellence, of which Tara's team is a part. Furthermore, members of corporate communications, legal, compliance, etc. also review the content.
 - Tara's team will then meet with the business unit prior to their launch in order to help guide their strategy and answer questions. The business unit owner is required to complete various forms to demonstrate that he/she has thoroughly researched their strategy and is prepared to fulfill the necessary work required to keep the social page active and engaging.

- The audit includes a review at the end of the year. If the business owners are not in compliance with the social guidelines, Tara’s team does have the authority to sunset the channel.
- **Consider the Use of a Community Handbook:** Aetna’s community handbook is a resource that describes the “plays” or actions that a community manager or business unit may use within the social channels and/or conversations. The expectation is that all business units will use the community handbook template to create a version that fits their own needs. Since Aetna has several products and services and lines of business, the template is a one-size-fits-all. All the business unit owner or community manager needs to do is plug in the details that suit their needs.
 - Tara explained that the handbook is broken down into several sections, including overall strategy and goals, a description of the audience and who the owner wishes to engage with online. The playbook encompasses the strategies for social listening, for engaging, for mediating and interpreting what people are looking for, along with governance and maintenance. This last piece includes Aetna’s policies and guidelines, the rules and responsibilities of the various people that are involved in social and then the training requirements, which is relatively new.
- **Implement Social Media Training:** Tara explained that the training is divided into three separate belts:
 - **White Belt:** This training is basically Social Media 101 for all employees. It is an online tutorial separated into three different modules. It outlines Aetna’s social strategy, its social media and community guidelines, accountability, its internal/external landscape (i.e. the various channels that Aetna uses), governance and the engagement structure. It is very basic, but there are many people who do not yet know this information.
 - This level also discusses personal brand and professional conduct on the social channels. It stresses that even if the individual is on his/her personal channel and has stated that he/she works for Aetna, they need to be cognizant of what is being said and/or shared.
 - This level goes over how to represent the Aetna brand on social – how to engage, how to share content and the inherent guidelines, as well as customer and brand privacy and information security. This is very important in a regulated industry.

- These modules walk employees through various scenarios, which have been created specifically for Aetna to mimic true life scenarios to teach the appropriate actions to take and/or what not to do.
 - **Green Belt:** The green belt is an online tutorial for community managers and other positions that have access to social media or social channel ownership. This training is more specific. It is more about community management and the rules of the road for engaging, i.e. how to escalate a post, how to work through the escalation, etc.
 - The Green Belt training discusses community management and overviews an outline of the community handbook, how it should be used, the importance of the escalation process, moderation of workflow processes and social media listening.
 - This level also discusses KPIs and ROIs in the context of what resonates with the executive level. It also goes over strategy and paid, owned or earned media, the difference between each definition and how each can be used to drive engagement.
 - **Black Belt:** This training is for those individuals involved in strategic social media decisions, as well as executives who speak at conferences, particularly with respect to Aetna’s social strategy. This part of the training is instructor-led and incorporates TED talks and real-life case studies. It will offer class discussions and assignments.
 - This part of the training is being finalized and is expected to be rolled out in December, 2014.
- **Create a List of Digital Assets:** Aetna has created a list of all their digital channels with corresponding primary and secondary contacts, as well as the associated business unit, the associated business use case, the date it was created and then a direct URL that links to the site. This is extremely helpful when there are a number of corporate/social channels. Tara has created a spreadsheet to help keep it all in one place. She stores and maintains this spreadsheet on Aetna’s social media SharePoint site, which is accessible to all employees. She also keeps an identical spreadsheet with the credentials – such as the passwords and user names, etc. – in a confidential folder that only Tara and her team can access.
 - Hillary asked if Tara personally manages this spreadsheet, which she does. Based on the audit, she will make the appropriate updates. This is another important point. Tara and her team make sure that they have the proper people listed for each page/channel and remove credentials when an individual changes positions.

- Tara will create a similar spreadsheet for the social media training described above as she is going to need to track those individuals who have received the training. She will create a tab for people that have completed their White Belt training, their Green Belt training and those moving towards their Black Belt.
- **Compile a List of Survey Questions for the Audit:** Tara shared what she uses as survey questions in her annual social compliance audit:
 - What is the purpose of the social media outpost? Include details on how this project/outpost promotes Aetna values and addresses an established public need.
 - What is the intended channel audience? Is it public/external? Private/internal? Research?
 - What is the reasoning for the intended channel? Why is the channel ideal for this content/conversation/community need?
 - Provide a description of the anticipated content and areas of conversation. Provide as much detail as possible, including supporting documents and plans.
 - Outline an initial sketch of the required content approvers/roles and the process for workflow of the approval process.
 - How active is the channel? When was the last access?
- **Prepare an Annual Audit Timeline:** Tara stated that each company will be different in how they want to set up their audit timeline, but shared what works for her:
 - Tara sends an email to all audit participants at the beginning of October. This is for all internal and external channels. Aetna has a Jive community platform that is also a part of this audit, as well as patient/provider communities and different medical management community program forums.
 - In mid-October, Tara forwards surveys to all contacts that own a social channel, have access to the social listening platform and/or are responsible for community management and content creation.
 - Surveys are given a November 15 deadline for completion.
 - Tara schedules a follow up call with each business unit to discuss the survey responses, ask for questions and determine the future of the channel.
 - Tara stated the importance of reminding channel owners of the need to keep their page/channel active because to not do so is a poor reflection on the company brand. If they have not done this throughout the year, this audit meeting is an

opportunity to reflect on whether or not the channel should be sunset. Aetna is very diligent about consistency and engagement. This audit is used to monitor many guidelines, but this is one of the most important requirements.

- Once the surveys are returned, Tara compiles the results and helps identify the next steps with the business owners:
 - Tara identifies any team members who no longer require access to the platform and/or the social channel in order to remove them from the database and disconnect access.
 - If a channel has not complied with the guidelines, Tara makes sure that the team is aware of any corrections that need to be made in order to keep the channel active.
 - Tara conducts spot checks and follow-up on any non-compliant channels within two weeks. If the channel is still non-compliant, she will sunset the channel.
 - Tara distributes audit findings to management and business partners by December 31st in order to close out the year.

Lessons Learned

The following is a summary of lessons learned as shared by participants within the discussion:

- Rachel asked Tara how Aetna handles the continual update and adaptation of the playbook. Tara replied that they update it quarterly, depending on the changes in internal and external policies. The playbook is sent out every quarter to the various business units across the organization asking for their best practices and recommended changes for the coming year.
 - Rachel added that the playbook needs to be in a format that is relatively easy to edit or it becomes very expensive. Tara stated that this playbook is easy to edit.
- Hillary asked how long it takes for someone to get through the White Belt training. Tara shared that the modules are approximately ½ an hour each. There is not a test at the end of each module, but it does show that the person has completed all three modules in order to advance to the Green Belt. There is a master course and certification affiliated with the Green Belt.
- Tara shared that she will sometimes do a Google search on the brand to make sure that dummy accounts do not exist. If she notices something that she does not feel comfortable with, she will get the security and fraud teams involved to check it out further. It is important not to dilute the company brand.

- One participant asked Tara how the sunsetting of a channel is communicated to the owner. Tara replied that the key is to gather solid business evidence to support the case. Ensure stringent documentation, including the number of times that guideline infractions have been brought to the business owner's attention over the year. Be diplomatic, stick to the facts and remind the business owner how infractions do not reflect well on the company brand. Point back to the guidelines, which is why it is so important to have a governance structure in place.
- When it comes to sunsetting a channel, one participant asked Tara if her team has the authority to shut the channel down. Tara replied that they do have that authority. This participant is a little frustrated because in his case, he has responsibility without the authority. They consult with the line of business and give recommendations and advise against certain directions, but if the business owner has the approval and budget from a different line of command, it goes ahead.
 - Rachel recommended that this participant prepare a visual summary of some of these issues and send it to someone senior in corporate governance to show what is happening when corporate governance policies are not enforced. Rachel further suggested piquing executive interest with weekly screenshots of all the various infractions, how it confuses customers and impacts the corporate brand. Rachel advised this participant to make the senior level aware of how serious an infringement might become and how quickly it can turn from low-level grumbling to a crisis if the rules are not strictly followed.
- Tara explained that they never remove any posts from customers unless it violates their community pact, which is posted in the social channels so that all users are aware of them. An example might be inappropriate language. Needless to say, there may be some very negative posts due to the various emotions that surround health insurance. Social media is instant attention for a frustrated or angry customer. Those posts may be hidden, but never removed.
- Rachel asked Tara to share her top challenge. Tara replied that her biggest challenge is keeping track of internal movement within the company and disconnecting access to channels accordingly. She finds it very difficult to be accountable for something that she cannot force people to do, i.e. to let her know when they have transferred positions or left the company.
- Hillary asked Tara for her advice to community managers who may not have a background in project management when it comes to completing an audit:
 - Tara believes that organization is the key. At the beginning of a project, Tara will create an outline of everything that needs to be completed and plot that on a timeline.

- The governance structure is the first and foremost step to be completed and then simply organize around that structure.
- It is helpful to have different templates for project completion, complete with deadlines and the steps to be completed along the way. A spreadsheet is incredibly helpful.
- Document all the back and forth emails and follow-up communication.

Additional Insights

Hillary asked participants to share what they were most interested in learning from this case study:

- Many were on the call to learn from someone else's experiences, especially in a highly regulated industry.
- One participant was interested to see how Aetna was able to align their social strategy with their overall company strategy.
- Another participant was particularly interested in Aetna's audit procedure.

Lastly, another participant was curious to hear about Aetna's social training program and what they have done