

Social Media Policy

for physicians and staff

Social Media includes websites such as Facebook, YouTube, Twitter and many others. New social networking websites allowing/encouraging online collaboration and/or commentary are being added each day. This policy covers all existing and future social networking media.

When You Engage In Social Media As A Company Employee

Emerging platforms for online collaboration are fundamentally changing the way we work, offering new ways to engage with patients and colleagues. It's a new model for interaction and we believe social media can help us to build stronger, more successful patient relationships. And it's a way for you to take part in conversations related to the work we are doing at our Company and the things we care about.

If you participate in social media, these are the guiding principles of the Company:

- When you engage in comments or discussions about the Company, use the Company-related website or other sites (e.g., Company Facebook account) for these activities. Please do not engage in comments or discussions about the Company on other websites.
- Stick to your area of expertise and provide unique, individual perspectives on what's going on at our Company and in the world.
- Post meaningful, respectful comments—in other words, no spam and no remarks that are off-topic or offensive.
- Always pause and think before posting – is this something you would say in person or to a mixed audience? That said, reply to comments in a timely manner, when a response is appropriate.
- Patient privacy is of utmost concern. Do not share anything that can identify a patient or otherwise constitutes disclosure of Personal Health Information of any of our patients. Alert management if you see information posted by others, including patients themselves, that is confidential.
- When disagreeing with others' opinions, keep it appropriate and polite.
- Know and follow the Company Confidentiality Agreement and HIPAA Privacy and Security Rules. Do not post pictures or images of employees, providers or patients without authorization.

RULES OF ENGAGEMENT

Be Transparent

Your honesty—or dishonesty—will be quickly noticed in the social media environment. If you are blogging about your work at our Company, use your real name, identify that you work for this Company, and be clear about your role. If you have a vested interest in something you are discussing, be the first to point it out. Transparency is about your identity and relationship to this Company. You still need to keep confidentiality around private information and patients.

Be Judicious

Make sure your efforts to be transparent don't violate patient privacy, confidentiality, and legal guidelines. Ask permission to publish or report on conversations that are meant to be private or internal to the Company. All statements must be true and not misleading and all claims must be substantiated and approved. Never comment on anything related to legal matters, litigation, or any parties with whom we are in litigation or who have made a claim of malpractice or who have lodged a formal complaint. Do not write or comment about other physicians or healthcare providers. Also be smart about protecting yourself, your privacy, and patient privacy. What you publish is widely accessible and will be around for a long time, so consider the content carefully.

Write What You Know

Make sure you write and post about your areas of expertise, especially as related to the Company and our services. If you are writing about a topic that this Company is involved with but you are not our expert on the topic, you should make this clear to your readers. If you are not a licensed provider such as a physician, nurse practitioner or physician assistant, do not write or comment on clinical topics or issues. And write in the first person. If you publish to a website outside our Company's website, please use a disclaimer something like this: "The postings on this site are my own and don't necessarily represent this Company's positions, strategies, or opinions, and do not constitute medical advice." Also, please respect brand, trademark, copyright, fair use, confidentiality, and financial disclosure laws. If you have any questions about these, contact Management. Remember, you may be personally responsible for your content.

Perception Is Reality

In online social networks, the lines between public and private, personal and professional are blurred. Just by identifying yourself as this Company's employee, you are creating perceptions about your expertise and about this Company by our stakeholders, patients, and the general public—and perceptions about you by your colleagues and managers. Do us all proud. Be sure that all content associated with you is consistent with your work and with this Company's values and professional standards.

It's a Conversation

Talk to your readers like you would talk to real people in professional situations. In other words, avoid overly pedantic or “composed” language. Don't be afraid to bring in your own personality and say what's on your mind. Consider content that's open-ended and invites response. Encourage comments. You can also broaden the conversation by citing others who are blogging about the same topic and allowing your content to be shared or syndicated.

Are You Adding Value?

There are millions of words out there. The best way to get yours read is to write things that people will value. Social communication from our Company should help our patients, partners, and co-workers. It should be thought-provoking and build a sense of community. If it helps people improve knowledge of health related topics or skills, improve their lifestyle, solve problems, or understand this Company better—then it's adding value.

Your Responsibility

What you write is ultimately your responsibility. Participation in social media networking on behalf of this Company is not a right but an opportunity, so please treat it seriously and with respect. Failure to abide by these policies and the HIPAA Privacy and Security Rules could put your employment at risk. Please also follow the terms and conditions for any third-party sites.

Be a Leader

There can be a fine line between healthy debate and incendiary reaction. Do not denigrate other physicians, hospitals or other healthcare providers, this Company or other employees/providers, and do not engage with others who have done so. Nor do you need to respond to every criticism or barb. Try to frame what you write to invite differing points of view without inflaming others. Some topics—like politics or religion—slide more easily into sensitive territory. So be careful and considerate. Once the words are out there, you can't really get them back. And once an inflammatory discussion gets going, it's hard to stop.

Did You Make a Mistake?

If you make a mistake, admit it. Be upfront and be quick with your correction. If you're posting to a blog, you may choose to modify an earlier post—just make it clear that you have done so.

If it Gives You Pause, Pause

If you're about to publish something that makes you even the slightest bit uncomfortable, don't shrug it off and hit 'send.' Take a minute to review these guidelines and try to figure out what's bothering you, then fix it. If you're still unsure, you might want to discuss it with your manager. Ultimately, what you publish is yours—as is the responsibility. So be sure.