

# SANILAC COUNTY COMMUNITY MENTAL HEALTH AUTHORITY

## ADMINISTRATIVE POLICY

**NUMBER: BA138**

**NAME: SOCIAL MEDIA POLICY**

|                        |            |                              |
|------------------------|------------|------------------------------|
| INITIAL APPROVAL DATE: | 02/19/2014 | BY: Administrative Committee |
| (LAST) REVISION DATE:  | 04/04/2023 | BY: CIO                      |
| (LAST) REVIEW DATE:    | 04/20/2023 | BY: Policy Committee         |
| DISCONTINUED DATE:     | N/A        | REPLACED BY: N/A             |

### I. PURPOSE

Sanilac CMH has adopted this policy on social media to comply with HIPAA, with the draft regulation requirements for such a policy, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements. All personnel of Sanilac CMH and all facility personnel must be familiar with the contents of this policy and follow its guidance, as appropriate, when using communications technology. Familiarity with the plan and demonstrated competence in the requirements of the plan are an important part of every Sanilac CMH employee's responsibility, as well as that of every other facility employee.

### II. APPLICATION

Populations: ALL  
Programs: **Direct - ALL**  
**Contracted - ALL**

### III. POLICY

Sanilac County Community Mental Health Authority has adopted this Social Media policy to comply with HIPAA and the draft regulations requirement to protect the security of electronic health information, as well as to fulfill our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements. All personnel of Sanilac CMH must be familiar with the policy and demonstrated competence in the requirements of the policy is an important part of every Sanilac CMH employee's responsibility.

### IV. DEFINITIONS

Social Media in this policy includes but is not limited to the following:

- Facebook
- Twitter
- Instagram
- LinkedIn
- YouTube
- Blogs and similar websites

## **V. STANDARDS**

### **1. Agency Social Media Use- Employees:**

Sanilac County Community Mental Health Authority employees must abide by the following guidelines:

- Employees will not discuss any confidential agency business on social media. This includes information about business practices and individuals receiving services.
- Employees will not use social media to discuss agency job related problems or conflicts.
- Content that is posted on social media sites may be positive personal statements. Statements should not represent the agency unless it is on an official agency site and authorized individuals post the information.
- Employees providing direct care cannot interact on social media platforms with those individuals who services are provided at Sanilac CMH.
- Do not use vulgar/offensive language, endorse products/services, or political parties/candidates on agency sponsored postings.
- Employees are encouraged to use discretion and common sense when employing social media for professional and personal use and ensure that they are not inadvertently compromising our professional, legal, or ethical standards.
- Employees are able to access social media on personal time such as breaks and lunch. However, discretion should be observed regarding the use of agency equipment and computer resources.

### **2. Social Media Monitoring-Authorized Agency Posts:**

The Chief Executive Officer will set standards for social media. IT, HR, and Marketing will monitor their social media sites posts as needed, during work time. To limit the need for monitoring, the social media site should include a message that states the site is not continually monitored and include contact information during business hours. When able, comments/messaging options should be set as inactive for the public. When posting, content matter should be thoroughly reviewed with the most sensitive audience in mind. Snipping/pasting content may be appropriate to ensure uncontrollable ads or other irrelevant information is not filtered through to Sanilac CMH's social media site. Posts on these sites should represent CMH as a whole; this could include bids, community/wellness activities, marketing, vacancies, agency news, brochures, community partner activities, etc. Names/pictures will not be included on these sites without the appropriate consent. HR will monitor Facebook posts for consistency and appropriateness of content.

## **VI. ENFORCEMENT**

All supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination from employment, professional discipline, or criminal prosecution in accordance with the facility's Sanction Policy.

## **VII. ATTACHMENTS**

## **VIII. REFERENCES**

Form #0058