

Yakima Valley Memorial Hospital Social Media Policy

January 14, 2011

Yakima Valley Memorial Hospital (Memorial) supports the use of social media and social networking sites by employees. We recognize the value of on-line Social Media sites and Blogs as vital resources to positively promote Memorial's vision and values, operational goals, marketing and recruitment activities, as well as a forum for exchange of information by our 2,600+ Memorial team members. We ask that employees, whether using social media for business-related or personal use, act in accordance with Memorial's vision and values. Memorial is proud of the caliber of employees we have at our organization and expect the same level of professionalism in social media forums as we would expect in other public forms by representatives of our hospital. This policy is intended to help our employees understand the expectations of our organization in regards to public social media forums, such as blogs, podcasts, discussion forums, and social networks.

- **Using Social Media.** Employees are expected to adhere to Memorial compliance requirements and the Memorial Code of Ethics when using or participating in social media. All the rules that apply to other Memorial communications apply here, specifically: respecting members, patients, customers and one another; protecting confidentiality, privacy and security; and safeguarding and ensuring proper use of Memorial proprietary information and resources.
- **Obtain pre-approval before setting up Memorial-related sites.** Memorial-related sites are defined as any sites developed to support a Memorial department, service, or group. These sites must be approved by the Memorial Communication and Marketing department (249-5219). For example, a Facebook page set up by a group of nurses to discuss events in a department would be classified as Memorial-related. A Facebook page set up by a group of nurses to discuss their common interest in wine tasting would not be Memorial-related. Similarly, a group set up to bring together individuals whose common link is the hospital, such as a forum for NICU parents, would be classified as Memorial-related.
- **Notification of existing sites.** Please notify the Communication and Marketing department of Memorial-related sites, networks or forums developed prior to the implementation of this policy. Please also notify the department if you see postings on other sites or blogs that relate to Memorial. Our intent is not to police or manage these sites, just to be aware of social media activities taking place that may include the hospital.
- **Personal use of social media sites.** Individuals are welcome to use social media sites for their own personal use. Similar to the internet, we ask that personal use of social media sites be done on the individual's personal time and not on work time. Do not use your Memorial e-mail address. Just as you would not use Memorial stationery to write a letter to the editor, you should not use your Memorial e-mail account to express personal views. If during personal use of social media sites, the individual's association with the hospital is referenced or acknowledged, it is important to remain in compliance with all rules and regulations that apply to hospital communications. It is also important to clarify that your position and opinion does not represent that of the hospital. Use a disclaimer such as- *The views expressed on this blog are mine alone and do not represent the views of my employer or any other person.* Also, when speaking from your own perspective, remember to use discretion. Although your communication may be intended to stay in a private forum, any communication once posted has the potential of becoming public.
- **Abide by the law and respect copyright laws.** For Memorial and our employees' protection, it is critical that everyone abide by copyright laws and obtain the appropriate permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.

- **Member/Patient Confidentiality.** Employees may not use or disclose any member/patient identifiable information of any kind on any social media site without the express written permission of the member/patient. Oral approval is not sufficient. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and Memorial policy.
- **Do not post medical advice.** Individuals should always be encouraged to see a provider in person if they have questions about their healthcare. It is important to make sure you post is not viewed as a medical diagnosis or treatment alternative.
- **Be Respectful.** Employees should not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity.
- **Do not pick fights.** If you see misrepresentations made about Memorial or the Memorial Family of Services in the media, by analysts or by other bloggers, alert Memorial's communications department. If you feel strongly that you should reply, identify yourself and speak only from your own knowledge and experiences. Clarify that your opinions are your own and do not represent the views or policies of Memorial. Remember that confrontation via social media sites is viewed no differently than confrontation directly with an individual. Temper your comments as though you were face-to-face with this individual in the workplace.
- **Do not share political ideology.** You may not provide any content to a hospital-affiliated Social Media Site that contains any product or service endorsements or any content that may be construed as political lobbying, solicitations or contributions or use the Social Media Site to link to any sites or political candidates or parties or use the Social Media Site to discuss political campaigns, issues or for taking a position on any legislation or law, unless authorized by administration.

THIS POLICY MAY BE UPDATED AT ANY TIME WITHOUT NOTICE, AND EACH TIME A USER ACCESSES A SOCIAL NETWORKING SITE, THE NEW POLICY WILL GOVERN, USAGE, EFFECTIVE UPON POSTING. To remain in compliance, the Memorial communications department suggests that you review the Policy at regular intervals. By continuing to post any content after such new terms are posted, you accept and agree to any and all such modifications to this Policy.

Tips for Using Social Media in the Workplace

- **Identify yourself:**
 - Identify yourself – name and, when relevant, your role at Memorial when you blog about Memorial or Memorial-related matters.
 - Write in the first person. You must make it clear that you are speaking for yourself and not on behalf of Memorial.
 - Some bloggers work anonymously, using pseudonyms or false screen names. Memorial discourages that practice in blogs or other forms of online participation that relate to Memorial, our business, or issues with which the company is engaged. We believe in transparency and honesty. If you are blogging about your work at Memorial, we encourage you to use your real name, be clear who you are, and identify that you work for Memorial.

- **Take responsibility:**
 - If you have a vested interest in something you are discussing, be the first to point it out. But also be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and also be judicious in disclosing personal details.
 - Speak in the first person. Use your own voice; bring your own personality to the forefront; say what is on your mind.
 - You are personally responsible for your post, not the hospital. If your comment or post negatively impacts the hospital, it will be your responsibility and will be treated similarly to any other action taken by an employee that has a negative effect on the hospital. This may include administrative actions against that employee.

- **Be accurate** – Respect the facts and link to the trusted sources that validate your opinions.

- **Be the first to respond to your own mistakes** – If you make an error, be up front about your mistake and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so. Do not delete posts.

- **Use your best judgment** – Remember that there are always consequences to what you write. If you're about to post something that makes you uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and the post is about Memorial business, feel free to discuss your proposed post with your manager. Ultimately, however, you have sole responsibility for what you choose to post to your blog or express online. You should make sure that blogging does not interfere with your job or commitments to customers.

- **Be professional** – Memorial workforce members are directed that, as with all communications, statements made in the confines of private blogs or chat rooms must treat the company and its employees, customers and competitors with respect.

- **Be mindful of the world's longer memory** – Everything you say is likely to be indexed and stored forever, either via search engines or through bloggers that reference your posts.

- **Remember that posts can be made public.** Either intentionally or not and you should not post something about your workplace, employer, fellow employees or patients that you do not want made public.

Definitions

Blog – Short for “Web log,” a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.

Electronic Media - Non-computing devices, e.g., floppy diskettes, flash memory drives, CDs DVDs, tapes, hard disks, internal memory, and any other interchangeable, reusable, and/or portable electronic storage media (1) on which electronic information is stored, or (2) which are used to move data among computing systems/devices.

Memorial Information - Information in any form or media that is created by or on behalf of Memorial in the course and scope of its business, regardless of whether that information is maintained or stored by Memorial and others on Memorial's behalf. Examples of Memorial information include, but are not limited to, patient and member records, personnel records, financial information, company competitive information, Memorial-developed intellectual property, and business e-mail messages.

Member/Patient Identifiable Information (MPII) – Any individually identifiable information regarding a member/patient of Memorial collected, received, created, transmitted, or maintained in connection with his/her status as a member or patient, such as PHI and CHD. MPII includes, but is not limited to, information about a member/patient's physical or mental health, the receipt of health care, or payment for that care; member/patient premium records, enrollment and disenrollment information; name, address, Social Security Number, account number, security code, information from or about transactions, driver's license number, financial or credit account numbers, phone numbers, ISP and Internet domain addresses, and other personal identifiers. MPII does not include individually identifiable information in Memorial employment records; however, it may be subject to other state and federal privacy protections. MPII does not include individually identifiable information (such as a cell, home or business phone number) that a workforce member obtains, transmits, or maintains about another workforce member in connection with a personal or employment-related relationship with that person.

Podcast – A collection of digital media files distributed over the Internet, often using syndication feeds, for playback on portable media players and personal computers.

Protected Health Information (PHI) - Individually identifiable information (oral, written or electronic) about a member/patient's physical or mental health, the receipt of health care, or payment for that care. PHI includes individually identifiable member/patient payment, dues, enrollment and disenrollment information. Individually identifiable health information in Memorial employment records is not PHI; however, it may be subject to other state and federal privacy protections.

RSS feeds or Syndication feeds - A family of different formats used to publish updated content such as blog entries, news headlines or podcasts and “feed” this information to subscribers via e-mail or by an RSS reader. This enables users to keep up with their favorite Web sites in an automated manner that's easier than checking them manually (known colloquially as “really simple syndication”).

Social media - Includes but are not limited to blogs, podcasts, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., Wikis), RSS feeds, video sharing, and social networks like MySpace and Facebook.

Wiki - allows users to create, edit, and link Web pages easily; often used to create collaborative Web sites (called “Wikis”) and to power community Web sites.