



TITLE: SOCIAL MEDIA POLICY

PURPOSE: To provide guidelines to Harris County Hospital District employees, volunteers, and persons affiliated with the Harris County Hospital District regarding the appropriate use of social media relating to the Harris County Hospital District, its patients, and business operations.

POLICY STATEMENT:

The Harris County Hospital District (HCHD) supports organizational transparency. All official statements made through the use of social media relating to HCHD including, its mission, operations, facilities, patients, and services shall be truthful.

POLICY ELABORATION:

HCHD respects the rights of its employees and others to communicate in the public arena, but each individual should act in a responsible and professional manner.

I. DEFINITIONS:

- A. **BLOG (WEB LOG):** An online journal updated on a regular basis, in reverse chronological order. The content is typically centered on a particular subject matter, and frequently offers the ability by readers to post comments or share the content with other persons or sites.
- B. **FACEBOOK®:** Social networking website designed to connect people with friends, family, and others.
- C. **MYSPACE®:** A social networking website.
- D. **PARTICIPANTS:** HCHD employees, volunteers, and those persons affiliated with the HCHD who elect to engage in social media communications.
- E. **SOCIAL MEDIA:** Any social networking Internet-enabled information sharing site or application, which is based on the potential for two-way conversation and interaction between people. In this context, “media” means digital words, sounds, pictures, and video, which provide a cultural, societal, or financial value to the participants. It includes,



but is not limited, to blogs, Twitter®, Facebook®, MySpace®, any online forums, and any other social media site activities.

- F. **SOCIAL NETWORKING SITES (SNS):** Web/Internet-based sites designed to build upon interactions to create communities of people online, and provide the required software to do this. Web-based social networking spaces offer a way for individuals or groups to create a profile and then share that profile with other members of the social networking space. The specific site may also provide a variety of ways for users to communicate with others in the space, such as instant messaging and chat-rooms, e-mail, or site mail (used only through the service), notes, blogs, file sharing, forums or other types of discussion groups, videos, and so on.
- G. **SPAM (ELECTRONIC JUNK MAIL):** Unsolicited, often commercial, message transmitted through the Internet as a mass mailing to a large number of recipients.
- H. **TWITTER:** A free Internet SNS used for posting short messages known as “tweets” via a central server, which is then sent to all users who have chosen to follow a specific user.

II. GENERAL PROVISIONS:

- A. Participants who use social media must do so in accordance with this policy and all applicable laws, including Title VII of the Civil Rights Act of 1964.
- B. HCHD Corporate Communications Department shall be responsible for reviewing considering, coordinating, and publishing social media content on official HCHD-managed social media sites, applications or Web pages.
- C. The official social media contacts for HCHD shall be the HCHD Corporate Communications Department.

III. TERMS AND CONDITIONS:

- A. The use of all social media, whether HCHD-hosted or non-HCHD hosted shall comply with HCHD policies, including, but not limited to, the HCHD:
 - 1. Media Relations Policy (Policy No. 8.02);
 - 2. Internet Acceptable Use Policy (Policy No.6.37);
 - 3. Use and Disclosure of Protected Health Information (PHI) for Facility Directories Policy (Policy No. 3.11.201);



4. Use and Disclosure of PHI for Marketing Policy (Policy No. 3.11.601);
5. Use and Disclosure of PHI for Fundraising Policy (Policy No. 3.11.602);
6. Making and Disclosing Photographic, Video, Electronic, Digital or Audio Recordings of Patients Policy (Policy No. 3.11.310);
7. Code of Conduct;
8. Non-Discrimination Policy 6.19;
9. Health Information Portability and Accountability Act (HIPAA) Policy (Policy No. 3.11); and
10. All related policies that are adopted and established by HCHD regarding the use of its property or disclosure of confidential information.

B. HCHD-Hosted Sites:

Individuals or departments who wish to host a SNS on behalf of HCHD must obtain approval from the Director of HCHD Corporate Communications.

- C.** Participants acting on behalf of HCHD may not post any comments or material that violates any law, including Title VII, copyright, or HIPAA.
- D.** Any Participant who violates this Policy may face disciplinary action, up to and including termination.
- E.** HCHD encourages comments on HCHD's various blogs and in support of HCHD on news-oriented Web sites.
- F.** HCHD shall actively review comments posted to HCHD-managed blogs or Web sites.
- G.** By posting any comments or other material on HCHD-sponsored blogs, Participants give HCHD the irrevocable right to use submissions for any purpose in any form and on any media. As a condition of posting any comment, Participants must agree not to:
1. Violate any law;
 2. Post advertisements or solicitations of business;
 3. Post chain letters or pyramid schemes;
 4. Impersonate another person;
 5. Allow any other person or entity to use his or her identification for posting or viewing comments; and
 6. Post the same note more than once or "spam."



- H. The HCHD reserves the right (but is not obligated) to do any or all of the following:
1. Remove any and all communications that fail to comply with this Policy; or
 2. Terminate a user's access to the blog feature based on violation of this Policy.
- I. HCHD is not responsible for any comments made by any Participant.



REFERENCES/BIBLIOGRAPHY:

Civil Rights Act of 1964 § 7, 42 U.S.C. § 2000e et seq (1964).

HCHD Policy and Procedures 8.02 Media Relations.

HCHD Policy and Procedures 6.37 Internet Acceptable Use Policy.

HCHD Policy and Procedures 3.11.201 Use and Disclosure of PHI for Facility Directories.

HCHD Policy and Procedures 3.11.601 Use and Disclosure of PHI for Marketing.

HCHD Policy and Procedures 3.11.602 Use and Disclosure of PHI for Fundraising.

HCHD Policy and Procedures 3.11.310 Making and Disclosing Photographic, Video, Electronic, Digital or Audio Recordings of Patients.

HCHD Policy and Procedures 6.19 Non-Discrimination Policy.

HCHD Policy and Procedures 6.36 Sexual Harassment Policy.

OFFICE OF PRIMARY RESPONSIBILITY:

HCHD Assistant Administrator Mission Advancement.

REVIEW/REVISION HISTORY:

Effective Date	Version# (If Applicable)	Review or Revision Date (Indicate Reviewed or Revised)	Reviewed or Approved by: (If Board of Managers Approved, include Board Motion#)
	1.0 Original Version	Approved 12/13/2011	HCHD Operations Policy Committee
01/26/2012		Approved 01/26/2012	HCHD Board of Managers (Board Motion # 12.1-05)



**ATTACHMENT A
RULES OF ENGAGEMENT - GUIDELINES**

HCHD Contributors/Participants must adhere to all HCHD policies in the use of all SNS. The purpose of these guidelines is to help HCHD assist Contributors/Participants in understanding how HCHD policies apply to the use of SNS.

1. **Follow all applicable HCHD policies.** For example, you must not share confidential or proprietary information about HCHD and you must maintain patient privacy. Among the policies most pertinent to this discussion are those concerning Internet Acceptable Use, Use and Disclosure of PHI, and Media Relations.
2. **Write in the first person.** Where your connection to HCHD is apparent, make it clear that you are speaking for yourself and not on behalf of HCHD. In those circumstances, you may want to include this disclaimer: “The views expressed on this [blog; Web site] are my own and do not reflect the views of my employer.” Consider adding this language in an “About me” section of your blog or social networking profile.
3. **If you communicate in online postings about HCHD or HCHD-related matters, disclose your connection with HCHD and your role at HCHD.** Use good judgment and strive for accuracy in your communications; errors and omissions reflect poorly on HCHD and may result in liability for you or HCHD.
4. **Use a personal e-mail address (not your name@hchd.tmc.edu address) as your only means of identification.** Just as you would not use HCHD stationery for a letter to a newspaper editor with your personal views, do not use your work e-mail address for personal views.
5. **Be respectful and professional to fellow employees, business partners, competitors, and patients.** Avoid using unprofessional online personas.
6. **Ensure that your blog-posting and social-networking activity does not interfere with your work commitments.**
7. **Be truthful in the online environment.** If you are expressing an opinion, make sure that is declared (e.g., In my opinion that organization is . . .), to not be confused with a statement of fact.
8. **Ask the Corporate Communications Department:** Please call the HCHD Corporate Communications Department at *(713-566-6430)* if you have any questions about what is appropriate to include in your blog or social networking profile. Remember that if you would not want your manager or others at HCHD to see your comments, it is unwise to post them to the Internet.