

**CROUSE HEALTH
POLICY/PROCEDURE/STANDARDS MANUAL**

ADMINISTRATIVE POLICY MANUAL
(admin/social media.doc)

SUBJECT: SOCIAL MEDIA / NETWORKING POLICY

ORIGINAL DATE: April 20, 2011

**REVIEW / REVISE: May 2011 (REV), May 2012 (REV), November 2012 (REV), April 2016 (REV);
March 2018 (REV)**

CHIEF EXECUTIVE OFFICER: _____

PURPOSE

This policy provides Crouse Health team members with an explanation of requirements for acceptable use of social media in which their affiliation with Crouse Health is known, identified or presumed. These requirements are intended to ensure compliance with legal and regulatory restrictions and privacy and confidentiality standards.

This policy is not intended to restrict the flow of useful and appropriate information, but is instead designed to protect Crouse Health, its team members, affiliates and patients from any harm that might result through the misuse of social media. Nothing in this policy is intended to or should be construed as restricting an employee's rights under Section 7 of the National Labor Relations Act ("Section 7"), or otherwise interfering with, restraining or coercing an employee in the exercise of these rights.

SCOPE

This policy applies to all Crouse Health team members who participate in and use social media tools, websites and other similar networks whose personal identity is in some way linked to Crouse Health. The policy may be modified periodically, in Crouse Health's sole discretion, as needed.

DEFINITIONS

Social Media: For purposes of this policy, social media (or social networking) refers to, but is not limited to, online networks such as Facebook, Twitter, Instagram, Pinterest and LinkedIn; wikis; video/photo-sharing web sites such as YouTube and Flickr; social bookmarking sites; communication web sites such as Skype; and any other form of online publishing, including blogs, discussion forums, newsgroups and e-mail distribution lists.

Team Member: For purposes of this policy, team members include employees, volunteers, College of Nursing students and faculty, medical staff members, interns, contractors, allied health professionals and all other individuals who provide services under the auspices of Crouse Health.

Patient Information: For purposes of this policy, Patient Information includes:

(1) “Protected Health Information” or “PHI,” which is defined under the Health Insurance Portability and Accountability Act (“HIPAA”) as all individually identifiable information in any media, e.g., oral, written or electronic form (and including images), relating to: (a) the past, present, or future physical or mental health or condition of an individual; (b) the provision of healthcare to an individual; or (c) the past, present or future payment for healthcare provided to an individual. Information is considered to be PHI where there is a reasonable basis to believe that it can be used to identify the individual; this encompasses many common identifiers (e.g., name, address, birth date, Social Security number). PHI also includes employee healthcare information protected under HIPAA; and

(2) All other such healthcare-related information obtained, maintained or learned by Crouse Hospital or its team members in the course of providing services to patients or employees, even if it is not deemed to be individually identifiable under HIPAA.

Proprietary Information: For purposes of this policy, Proprietary Information includes non-public information in spoken, printed, electronic or any other form related to Crouse Health trade secrets, information regarding the strategic development of products or services, internal reports, procedures, policies, know-how, technology, patents, vendors, strategic competitive information, or other internal business-related confidential communications. Proprietary Information does not include discussions concerning the terms and conditions of employment.

POLICY

Prohibited Disclosures: Protecting the privacy and confidentiality of our patients and their healthcare issues is fundamental to our mission as a leading healthcare provider. It is also our obligation under the law. Accordingly, this policy prohibits the posting of and/or disclosing of, directly or indirectly, any Patient Information on or through social media/networking sites by team members. It is also essential that we protect against the unauthorized disclosure and misappropriation of Crouse Health’s intellectual property and other confidential business-related information. Therefore, this policy also prohibits team members from posting or disclosing, directly or indirectly, any Proprietary Information on or through social media/networking sites. Additional restrictions may apply, as explained below.

Additional Social Media Requirements:

1. Crouse Health team members should be aware of and must comply with all applicable standards of conduct outlined in the Crouse Health Employee Handbook and communications related to Crouse’s mission, vision and values, including all standards regarding the privacy and confidentiality of Protected Health Information, Proprietary Information, and all other confidential business-related information.
2. Crouse Health’s intellectual property, such as logos, graphics and copyrights may not be used for any unauthorized commercial use, or for any non-commercial use other than those uses protected under the law.
3. Team members who engage in personal activities on external social media platforms may not use Crouse Health’s name or Crouse Health-identifying attributes in their usernames or screen names (e.g., ‘bobatcrouse’), nor can they speak as representatives or on behalf of Crouse Health unless expressly authorized in advance by Crouse Health as official spokespersons. (Indicating employment at Crouse Hospital is perfectly fine.)

4. If team members (who are not designated as official spokespersons) identify themselves as employees of Crouse Health, they must state that they are expressing their personal opinions when discussing their employment, Crouse Health, or its services or products, and that their opinions do not represent the official views of Crouse Health (in accordance with Federal Trade Commission Guidelines). This may be accomplished by posting the following disclaimer – “*The views expressed on this [blog/website] are my own and do not necessarily reflect the views of Crouse Health.*”
5. Team members are prohibited from using social networking to unlawfully harass, abuse, discriminate against, threaten violence against, or make malicious, obscene or defamatory statements about Crouse Health’s employees, affiliated physicians, other healthcare providers, volunteers, students, patients, guests, vendors or contractors. In other words (and consistent with the Crouse values): be respectful. Harassment includes offensive social media posts or other offensive content which could contribute to a hostile work environment on the basis of race, sex, disability, religion, or any other status protected by local, state or federal law. This requirement is not intended to limit, or infringe on Section 7 rights.
6. Team members should recognize that their online communications/social media activity can impact their personal image/reputation and may be seen by others as a reflection of their character, judgment and values. Posting some types of information or photographs may jeopardize their individual, personal, and/or professional reputation. It is important to note that information shared online in social media forums can last forever on the Internet and is available to everyone, including your employer (not to mention your mother, spouse, etc.). The bottom line? Use common sense, and do not engage in inappropriate discussions that include discriminatory remarks, harassment, threats of violence, obscene or malicious language, or other similar forms of inappropriate and unlawful language that is harmful to others.
7. Authorized personnel in Crouse Health’s Communications and Human Resources Departments (and others who may be authorized by Crouse Health from time to time in its sole discretion) may use social media in the course of their duties on behalf of Crouse Hospital during working time to perform their job duties for approved, business-related purposes.
8. Students in the College of Nursing are not permitted to access social media platforms during classroom or clinical hours except for school-related purposes. Students found to be accessing these sites for non-school-related purposes will be subject to progressive discipline, up to and including dismissal from the College. Students should also be aware of, and must comply with, all other applicable codes of conduct outlined in the College handbook and other Crouse communications that refer to Crouse’s mission, vision and values.

POLICY VIOLATIONS

Any team member found to have violated this policy will be subject to, as may be appropriate depending on his or her affiliation with Crouse Health, disciplinary action up to and including termination, suspension or termination of privileges, contract termination, civil litigation, and/or civil or criminal prosecution under applicable state and federal statutes.

Crouse Health employees who suspect or who have knowledge of violations of this policy are encouraged to notify their immediate supervisor, Human Resources, or Corporate Compliance. Students who suspect or have knowledge of violations of this policy must contact the Student Life Coordinator. Those students who do not report violations they are aware of will also be subject to disciplinary action up to and including dismissal from the College. All other Team Members should contact Corporate Compliance to report any suspicion or knowledge of violations of this policy.

Crouse Health intends this policy to comply with all applicable laws, including laws protecting certain lawful employee activities, and it will enforce this policy consistent with all such legal requirements and with any

applicable labor contract provisions for bargaining unit employees represented by Local 1199.

To reiterate, nothing in this policy is intended to limit, or infringe on, Section 7 rights, and Crouse Health will not apply this policy in a manner that in any way limits or infringes upon such rights.

REVISIONS

It is the responsibility of the Vice President of Communications or designee to initiate revisions to this policy as needed.