



POLICY and PROCEDURE System_IM 26

Subject:
System_IM26 Use of Social Media Sites

Effective Date:
July 2010

Applies to:

**Date Revised/
Reviewed:** June 2017

Houston Methodist Hospital, The Medical Center
Houston Methodist Baytown
Houston Methodist Clear Lake
Houston Methodist Continuing Care Hospital
Houston Methodist Sugar Land
Houston Methodist The Woodlands
Houston Methodist West
Houston Methodist Willowbrook
Houston Methodist Research Institute
Houston Methodist Corporate Division
Houston Methodist Global Health Care Services
Houston Methodist Institute for Academic Medicine
Houston Methodist Specialty Physician Group
Houston Methodist Primary Care Group
Houston Methodist Coordinated Care Organization

Originating Area:
Information Technology Division

Target Review Date:
06/30/2020

I. POLICY AND GENERAL STATEMENT

This policy describes Houston Methodist's approach to appropriate use of social media and other third party websites. Employee use of a Social Media Site while using Houston Methodist computing resources and while at work should be restricted to activities that support corporate goals and objectives, and are in accordance with Houston Methodist's values and policies.

Employee social media activity is covered by other Houston Methodist policies, including but not limited to, those policies listed below in the Authoritative References section. Violations of this policy may result in disciplinary action in accordance with Policies and Procedures, up to and including termination of employment.

II. DEFINITIONS

1. **Blog:** A website that contains information such as events, commentary, pictures, or video, etc. Blogs provide commentary or news on a particular subject. Blogs can be stand-alone sites created by an individual or may be hosted on larger websites such as a newspaper website or a Social Media Site.

2. **Confidential Information:** Business, employee, financial, or other proprietary data that is maintained or transmitted in any form or medium.
3. **Content:** Employee, business, patient protected health information, Houston Methodist financial information, healthcare practices or protocols, or any other information that is transmitted or maintained in any form or medium including text, images, video, and audio formats.
4. **Houston Methodist Information:** Information in any form or media that is created by or on behalf of Houston Methodist in the course and scope of its business, regardless of whether that information is maintained or stored by Houston Methodist and others on Houston Methodist's behalf.

Houston Methodist information may include, but is not limited to, patient records, personnel records, financial information, intellectual property, and business email messages.

5. **Protected Health Information (PHI):** Individually identifiable health information transmitted or maintained in any form or medium (electronic, oral, or written) by a covered entity or its business associates 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. It excludes certain educational and employment records.
6. **Social Media:** Includes all means of communicating and posting information or content of any sort on the Internet, including a web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or chat room, whether or not associated or affiliated with Houston Methodist, as well as any other form of electronic communication.
 - a. **Examples:** Social media includes online platforms that facilitate activities such as professional or social networking, posting commentary or opinions, and sharing pictures, audio, video, or other content. Also personal websites and all types of online communities (e.g., Facebook, LinkedIn, Yelp, YouTube, Twitter, Instagram, Keas, and message boards).
7. **User:** Any individual granted access to use Houston Methodist system resources.

III. PROCEDURE

A. Use of Houston Methodist Computing Resources and Social Media

Houston Methodist recognizes social media services can be used as tools for communicating and gathering business-related information, and for the organization to disseminate information to employees regarding organizational updates, announcements, sponsored events, etc.

Consistent with Policy IM01 Acceptable Use of Computing Resources, Houston Methodist provides tools and resources to employees, contractors, and volunteers to support its goals and objectives. This includes organization participation on Facebook

and Twitter. Therefore, it is important to distinguish between business use and personal use of Social Media Sites.

(1) Houston Methodist Business Use

Some employees, based on their job function, are authorized to use Social Media Sites to conduct Houston Methodist business. In accordance with this policy and **if done with the purpose of furthering Houston Methodist business objectives**, employees may include on their profiles the Houston Methodist name and their contact information including phone numbers and email addresses.

Examples of participation on Social Media Sites that further Houston Methodist business include:

- (a) A Houston Methodist Recruiter sourcing candidates for a hard-to-fill position by announcing a job opening on an association Facebook page;
- (b) Public Relations/Marketing employees posting Houston Methodist sponsored events on Twitter to increase employee and community outreach efforts;
- (c) The Disaster Planning Committee posting updates on Twitter during a natural disaster to utilize all forms of communication available to reach ride-out and recovery employees; and
- (d) Management use of a video on YouTube that depicts a particular clinical procedure as supplemental information for a training presentation or exercise.

Management reserves the right to limit the use of certain Houston Methodist computers *for operational purposes only* in order to prevent interruption of operations and services (for example, a computer may be restricted to accessing the Intranet and/or Houston Methodist network only, or another may be further restricted to accessing specific programs and software only).

(2) Personal Use:

Employees are to use Houston Methodist computing resources for business purposes only and in accordance with Policy IM01 Acceptable Use of Computing Resources. Personal use should be minimal and must not violate any Houston Methodist policies (especially those referenced at the end of this document and identified in the Employee Handbook). Employees should have no expectation of privacy with regard to their use of Houston Methodist computing resources.

Refrain from using Social Media while on work time or on Houston Methodist computing equipment, unless it is work-related as authorized by management or consistent with Policy IM01.

B. Communications Representing Houston Methodist's Interests

(1) Contact with the Media

Employees who are contacted by any media organization or representative of a social media site that are requested to provide information/comment related to Houston Methodist business are to be referred directly to Houston Methodist Public Relations.

If contacted by the media, answer all media questions as follows:

“I am not authorized to comment for Houston Methodist.
Please contact our Public Relations Office directly at: (832)
667-5809.”

(2) Social Media Postings

Individuals or groups employed by or associated with Houston Methodist are not permitted to present personal opinions that in any way imply endorsement by Houston Methodist.

If posted material may be reasonably construed as implying, directly or indirectly, the support, endorsement, or opposition of Houston Methodist with regard to any personal statements, including personal opinions or views on any issue, the material must be accompanied by a disclaimer such as:

(a) If word count limits allow:

- "The postings on this site are my own and do not represent Houston Methodist Hospital System's positions, strategies, or opinions."
- "I work at Houston Methodist (or particular work unit, department, division of Houston Methodist), but the opinions (or views) expressed here are solely my personal opinion (or views)."
- "I am not speaking as the official spokesperson for Houston Methodist, but my personal opinion is ..."

(b) For Twitter or similar platforms with restrictive word count allowances:

- "Tweets my own," "Views my own," or "#myopinion."

(c) For personal Web sites:

- "This is a personal Web site, produced on my own time and solely reflecting my personal opinions. Statements on this site do not represent the views or policy of my employer, past or present, or any other organization with which I may be affiliated."

(3) Employee Endorsements

In commenting about Houston Methodist on the Houston Methodist-hosted website or other Social Media to talk about or endorse its products or services, employees should make sure that their relationship with Houston Methodist is disclosed to people who read their online postings.

For non-Houston Methodist-hosted Social Media Sites, listing the employer's name on a personal profile page is *not sufficient*. Disclosure on any posting to a Social Media Site should include one of the following examples:

(a) If word count limits allow:

- “I work at Houston Methodist.”
- “I am an employee of Houston Methodist.”

(b) For Twitter or similar platforms with restrictive word count allowances:

- “My company,” “my job,” “my hospital,” or “#job.”

In accordance with Federal Trade Commission rules, such disclaimers and disclosures must be clear, conspicuous, and noticeable. It should be close to the claims to which they relate, in a font that is easy to read, and in a shade that stands out against the background. The reader should be able to notice the disclosure easily.

C. Patient Privacy and Confidentiality

Employees may not publish or post any Content on a Social Media Site that is related to a Houston Methodist patient, including all PHI related to any patient and that patient’s privacy consistent with Houston Methodist policy and applicable state and federal laws. For example:

- (1) Do not have on-line conversations about a patient’s condition, diagnosis, physical appearance, or financial resources, even if the comments are meant to be supportive or compassionate of the patient’s circumstances. If another individual has posted incorrect information about a patient’s condition, do not use information learned as an employee at Houston Methodist to correct that individual.
- (2) Do not post pictures or videos of patients unless all requirements under Policy IM06 and Policy HR12 have been met.
- (3) Do not have on-line conversations about the sighting of a celebrity or prominent individual being treated at Houston Methodist or the nature of the individual’s treatment.

D. Post Only Appropriate and Respectful Content

- (1) Maintain the confidentiality of Houston Methodist trade secrets and private or confidential information.
 - (a) Trade secrets may include information regarding the development of systems, processes, products, knowhow, and technology.
 - (b) Do not post internal reports, policies, procedures, or other internal business-related, confidential communications.
- (2) Do not share confidential information regarding Houston Methodist customers, its vendors, or business associates.

(3) Respect all copyright and other intellectual property laws.

(a) For the protection of Houston Methodist and its employees, respect all laws governing copyright, fair use of copyrighted material owned by others, trademarks and other intellectual property, including Houston Methodist's own copyrights, trademarks, and brands.

(b) Do not use Houston Methodist's logo(s), mark(s), or other protected information or property for any personal business or commercial enterprise.

E. Personal Responsibility for Content

Employees are personally responsible for the Content they publish.

(1) Houston Methodist trusts and expects all employees to exercise personal responsibility whenever participating in Social Media or other online activities.

(2) Employees should always be honest and accurate when posting information or news. Correct any and all errors quickly.

(3) Never post any false information or rumors about Houston Methodist, its patients, employees, visitors, vendors, or business associates.

(4) The Internet archives nearly everything. Deleted posts can be searched and possibly retrieved, so use discretion.

F. Remember the ICARE Values

Employees should consider whether anything they post on the Internet is in accordance with the ICARE values at Houston Methodist as well as the conduct expectations of all Houston Methodist employees, contractors, and volunteers.

(1) Employees should avoid damaging the image and integrity of Houston Methodist.

(2) Any harassment, bullying, discrimination, or retaliation that would not be permissible in the workplace is not permissible between employees on-line, even if it is done after hours, from home, or on personal electronic devices.

(3) Always strive to be fair and courteous, avoid posting Content that reasonably could be viewed as malicious, obscene, threatening or intimidating, or that disparages our patients, employees, visitors, vendors, or business associates. Examples of such conduct might include offensive posts meant to:

(a) Intentionally harm someone's reputation; or

(b) Posts that could contribute to a hostile work environment on the basis of race, sex, sexual orientation, gender identity, disability, religion, or any other status protected by law or company policy.

G. Right to Communicate.

Houston Methodist respects employees' right to communicate on their own (or other employees') behalf concerning terms and conditions of employment. Nothing in this policy is intended to interfere with employee rights under federal and state laws. Houston Methodist will not interpret or apply any of its policies in a manner that would restrict employees' rights under the National Labor Relations Act.

IV. COUNCILS OR COMMITTEES REVIEWING OR APPROVING POLICY

Information Security and Privacy Committee (ISPC)
System Business Practices Committee

V. AUTHORITATIVE REFERENCES

FTC, The FTC's Endorsement Guide: What People Are Asking (May 2015)
NLRB, Office of the Gen. Counsel, Memorandum OM 12-59 (May 30, 2012)
NLRB, Office of the Gen. Counsel, Memorandum OM 15-04 (Mar. 18, 2015)
Policy HR01: Managing for Performance
Policy HR08: Equal Employment Opportunity
Policy HR12: Confidentiality and Information Security Agreement
Policy HR32: Nondiscrimination
Policy HR87: Harassment
Policy IM01: Acceptable Use of Computing Resources
Policy IM06: Uses and Disclosure of Protected Health Information
Policy IM13: Release of Media Information

VI. NAME OF APPROVING EXECUTIVE: Marc L. Boom, M. D.

TITLE: President,
Chief Executive Officer

(Signed Original on File)

Signature of Approving Executive

Date Signed

Revision History

Revision	Date	Changed by	Revision Summary
1	11/14/13	Barry Beckett	Updated to reflect: branding, approving executive and revision history. Update also defines procedure previously identified as guidelines.
2	04/14/17	Business Practices	Updated to reflect: Newly revised FTC and NLRB rules and guidelines regarding employee endorsements and the use of social media.

