

NORTHCARE NETWORK

POLICY TITLE: Social Media Policy	CATEGORY: Information Management	
EFFECTIVE DATE: 9/9/20	BOARD APPROVAL DATE: 9/9/20	
REVIEW DATE: 6/22/23	REVISION(S) TO POLICY STATEMENT: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	OTHER REVISION(S): <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
RESPONSIBLE PARTY: CIO and Social Media Workgroup	CEO APPROVAL DATE: 7/11/23 Megan Rooney, Interim CEO	

APPLIES TO

NorthCare Network Personnel

POLICY

It is NorthCare Network's policy to ensure that the use of a social media platform(s) is correctly monitored and regulated. This is to establish a secure source of information distributed by the NorthCare Network Social Media Workgroup with the expectations to comply with the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Health Information Technology for Economic and Clinical Health Act, Michigan Mental Health Code, 42 CFR Part 2. NorthCare Network will utilize Facebook as the primary social media platform.

PURPOSE

The purpose of this policy is to establish guidelines for the release and circulation of approved and relevant information by NorthCare Network using social media platforms, while maintaining the highest level of integrity and complying with applicable federal and state laws and regulations, contractual obligations, and accrediting standards. With the changes in technology and information NorthCare Network will form a social media presence. This new platform will allow more individuals to be able to connect and share with NorthCare Network providers, while also allowing NorthCare Network to reach different groups of people in the social media community. Building a positive social media presence will allow for NorthCare Network to connect with individuals and share more information aligned to the mission of NorthCare Network to the best of our ability.

DEFINITIONS

1. **Social media:** Internet channels used by large populations to share information and develop social and professional contacts.
2. **Social media web page/site:** a single document page on the internet that can incorporate text, graphics, and sounds to reach a population through a social platform.
3. **Website:** a connected group of pages on the internet usually updated by individuals through one universally maintained organization.
4. **Post:** A social media status update, or an item on a blog or forum
5. **Protected Health Information (PHI):** Any information that identifies an individual and relates to at least one of the following:
 - a. The individual's past, present or future health care
 - b. The provision of health care to the individual.
 - c. The past, present or future payment for health care.

6. **Electronic Protected Health Care Information:** any protected health information (PHI) which is stored, accessed, transmitted or received electronically.
7. **Security Incident:** The attempted or successful unauthorized access, use, disclosure, modification, or destruction of information or interference with system operation in an information system.

REFERENCES

- HIPPA 45 CFR Part 160, 45 CFR Part 162, and 45 CFR Part 164
- HITECH 42 CFR: Subsection D
- NorthCare Network Information Security Policy
- NorthCare Network Information Management Systems Policy
- NorthCare Network Public Presentation and Media Policy

HISTORY

NEW POLICY: 9/9/20

REVISION DATE: 1/28/21

REVIEW DATE: 1/28/21, 11/22/21, 8/29/22, 6/22/23

CEO APPROVAL DATE: 9/1/20, 3/2/21, 12/6/21, 9/6/22, 7/11/23

BOARD APPROVAL DATE: 9/9/20

PROCEDURES

- A. NorthCare Network will create and establish a social media workgroup. All members of the workgroup will be approved by the CEO or designee.
 1. The workgroup will maintain a minimum of five members of NorthCare Network personnel.
 2. The workgroup will be expected to oversee, review and approve all information on the social media website.
 3. This group will monitor and maintain the development and use of social media under NorthCare Network.
 - i. The social media workgroup will designate and approve all social media by arranging and assigning members of the social media workgroup as administrators.
 4. NorthCare Network personnel must relinquish administrative rights to all NorthCare Network social media upon leaving the social media workgroup, or upon termination or resignation of their NorthCare Network position.
 5. Social media workgroup members will receive training specific to this policy in addition to all other required trainings.
- B. The social media workgroup will agree upon administrators of each social media page.
 1. Two to three members of the social media workgroup, who have approved personal social media accounts, will be designated as administrators of the social media webpage.
 2. The administrators of the social media webpages will consistently monitor all information posted and released. No information deemed confidential under the Health Insurance Portability and Accountability Act of 1996 (HIPAA), Health Information Technology for Economic and Clinical Health Act, Michigan Mental

Health Code, 42 CFR Part 2 or any other applicable law or policy will be shared at any time.

3. Information shared on social media will be agreed upon by a simple majority of the social media workgroup prior to posting. The social media workgroup will check the information to confirm that it is relevant, correct, and does not reflect negatively on NorthCare. The content decisions made by the workgroup will be recorded in the Social Media Workgroup Team in Microsoft Teams.

C. It will be the priority of the social media workgroup to establish and maintain any and all NorthCare Network social media related webpages.

1. The social media workgroup will create an approval process for all information linked to and posted on the social media page.
 - i. This would include the following:
 - a. Any newly generated posts created by NorthCare Network personnel.
 - b. Prior generated statements, such as closure due to weather or inclement conditions.
 - c. Other possible posts using prior information related to set meeting times or reminders.
 - d. Posts relating to community events or information shared by NorthCare Network providers must be approved before sharing on NorthCare pages.
 - e. NorthCare Network employment opportunities.

D. Maintaining security and privacy measures will be a main priority of the social media work group.

1. When setting up the social media web page, administrators must retain and establish safety measures that limit the amount of information being released.
2. Absolutely no protected health information (PHI) or personal information will be linked to the social media pages in order to protect all individual's rights under Health Insurance Portability and Accountability Act of 1996 (HIPAA), Health Information Technology for Economic and Clinical Health Act, Michigan Mental Health Code, 42 CFR Part 2.
3. Absolutely no information that is deemed confidential will be released or linked to the social media pages in order to protect all individual's privacy rights.
4. The administrators of the social media pages will remain private whenever possible based on the social media platform being used.
5. If the social media page allows for direct messaging, NorthCare social media workgroup will use the following auto-generated message response that will link individuals to the proper channels of communication with NorthCare Network:
"Thank you for your message. NorthCare Network does not respond to private messages via social media. If have further questions regarding specialty mental health care or substance use disorder services, please contact our Access Center at (888) 906-9060. If this is an emergency, please call 9-1-1."
6. Private messages will be reviewed periodically by social media workgroup members and addressed with their supervisor(s) if necessary.
7. If any compromises in information relating to or connecting to the security of the social media page is detected all social media workgroup members, as well as the privacy and security officer must be made aware immediately.

E. Disclaimer statement will be made on the page stating:

There should be no expectation of confidentiality when using this page. The intent is to connect and support everyone in our community. We want to keep you up to date on all that is happening at NorthCare Network and share with our providers. Feel free to share your thoughts and comments but be aware that you are sharing them with the entire online community. NorthCare Network has limited commenting on Facebook posts. NorthCare Network reserves the right to remove any comments that are deemed inappropriate under NorthCare Network policy and applicable social media platform social media standards.

F. Moderation of Comments and User Interaction

1. NorthCare Network will utilize standard tools within each social media site to assure content is consistent with agency policies and requirements as well as community standards.
2. Visitor posts will be disabled on social media sites.
3. NorthCare Network will utilize best practices to prevent comments on posts from being viewed publicly. Comments will be reviewed periodically by social media workgroup members and addressed with their supervisor(s) if necessary.