



Department: Ethics & Compliance	Policy Description: Use of Social Media
Date First Approved: October 27, 2010	Replaces Policy Dated: N/A
Effective Date: October 27, 2010	Date Retired: NA
Date of Most Recent Revision: New	Policy Reference No. EC.024

SCOPE: All Workforce members, as defined below.

BACKGROUND:

The health care industry, like many other industries, has embraced the use of Social Media sites, including Blogs. Social Media sites facilitate communication, education, collaboration with others, research, business travel, etc. For many, the Internet is a tool to aid in daily business practices that improves work quality and job satisfaction. The Internet provides a wide array of resources, services, and interconnectivity between organizations and Workforce members (as defined below). However, there are also risks associated with inappropriate Internet access and use of Social Media sites, which must be addressed through appropriate safeguards, policies and practices, education and training, and appropriate corrective action when necessary. Monitoring appropriate use of the Internet and Social Media sites by Workforce members is a joint responsibility of the leadership of Capella Healthcare and its affiliates (the “Company”), including information technology (IT), marketing/communications, and human resources staff.

DEFINITIONS:

1. **Blog:** A Blog is a website maintained by an individual or organization with regular entries of commentary, descriptions of events, or other materials such as graphics or video. Blogs may provide commentary or news on a particular subject; others function as more personal diaries.
2. **Social Media:** For the purposes of this Policy, “Social Media” is an on-line social structure made up of individuals or organizations that are tied together by one or more specific types of interdependency, such as values, visions, ideas, financial exchange, friendship, business operations, professional exchange, etc. Social Media sites operate on many levels, from families up to the level of nations, and play a critical role in determining the way information is exchanged, problems are solved, organizations are run, and the degree to which individuals succeed in achieving their goals. Examples of Social Media sites include, but are not limited to Facebook, MySpace, LinkedIn, Twitter, or other similar sites.
3. **Workforce:** Under HIPAA, the Workforce is defined to include not only employees, but also medical staff members, volunteers, trainees, contracted personnel, business associates and other persons who perform work for a covered entity, whether or not they are paid by the covered entity.

PURPOSE: To ensure all Workforce members use Social Media in such a manner as not to defame, denigrate, embarrass or cause harm to the Company, any Workforce member (as defined above), or any patients of the Company’s facilities.



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PROCEDURE:

1. The Company supports approved work-related access to the Internet that is consistent with job responsibilities and Company policies.
2. The Company, through its Marketing/PR and Human Resource departments, will establish and maintain any official presence on Social Media sites (meaning sites set up in the name of Capella or any affiliate). This presence will support the enhancement of and/or expansion of communication.
3. The use of Social Media and/or Blogs for Company-sponsored business operations shall be under the oversight of the responsible business unit (examples below):
 - A. Marketing/PR and Business Development
 - B. Human Resources and Recruitment
 - C. Information Technology & Services
 - D. Ethics & Compliance
 - E. Facility Privacy Officer
 - F. Physician Recruitment
 - G. Physician Practice Management
4. At no time shall Workforce members using Social Media sites, within either a personal or professional context, share patient-identifying information (PHI), including photographic images, or proprietary business information without proper written authorization. All uses and disclosures of PHI shall be carried out in a manner compliant with applicable patient privacy policies, regulations, and standards. Prior to sharing PHI or images, the individual responsible for the project involving the sharing of that information shall obtain a written authorization for the use and disclosure of the information from the patient or patient's legal representative.
5. Capella Healthcare supports its Workforce members' use of Social Media sites for personal and appropriate professional use, recognizing that Workforce members have a strong voice in representing the Company. The Company has developed Social Media Guidelines for Workforce members to provide guidance regarding communicating Company-related content through Social Media sites (*see Attachment*). As outlined in Policies IT.SEC.001 and 002, any and all communications conducted on the Company's computers or other electronic communication devices are subject to review and auditing by the IT&S Department regardless of whether those communications are personal or professional in nature.
6. Appropriate use of Social Media sites by Workforce members, whether personal and professional in nature, will include compliance with all applicable Company policies, including those addressing patient privacy, protection of proprietary business information, government



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<p>affairs, mutual respect, political activity, and use of company resources, including computers, email and Internet access. The Company has the right to delete (or request removal) of any content or comments that are irrelevant, offensive or non-compliant.</p>	
<p>REFERENCES:</p> <ul style="list-style-type: none">▪ HIM.PRI.003 Patient Privacy Protection▪ EC.023, Guidelines for Human Photography▪ IT.SEC.005, Information Confidentiality and Security Agreements▪ IT.SEC 001▪ IT.SEC 002▪ Code of Conduct▪ Social Media Guidelines for Capella Healthcare Workforce Members (<i>attached</i>)	



Social Media Guidelines for Capella Healthcare Workforce Members

The following guidelines have been created to help Workforce members of Capella Healthcare (the “Company”) understand how the Company’s policies apply to these newer technologies for communication as there is often an overlap between personal and professional/work activities.

Definitions: “Social Media” sites include Facebook, MySpace and LinkedIn as well as blogging and micro-blogging sites like Twitter. “Workforce” is defined under HIPAA to include not only employees, but also medical staff members, volunteers, trainees, contracted personnel, business associates and other persons who perform work for a covered entity, whether or not they are paid by the covered entity.

The main thing you should remember about using Social Media sites is that the same basic Company policies apply in these spaces as in other areas of your life. While there are significant positive opportunities, there are also many risks. Unauthorized or inappropriate commentary or posts online can:

- Get the Company, and the individual who is posting, in legal trouble with government agencies, other companies, customers/patients or the general public. HIPAA issues are particularly challenging.
- Diminish the Company’s reputation by creating negative publicity.
- Cause damage to the Company by releasing non-public information or proprietary information.
- Undermine the Company’s competitive advantage.
- Cost an employee or a physician a job.

Here’s an overview of the most important things you should remember when using Social Media sites:

- **First And Foremost, Respect the Privacy of Our Patients.** Workforce members should never publicly make comments about the care of a specific patient, including on-line. Even acknowledging the care of a patient is an unacceptable disclosure of patient identifying information. Remember, disclosing confidential patient information in an inappropriate manner is a federal offense under HIPAA. The penalties include significant fines and criminal penalties. The Company takes violations of patient privacy very seriously and takes corrective action when aware of such a violation.
- **Follow all applicable Company policies.** For example, you must never share confidential or proprietary information about Capella Healthcare, a hospital, a vendor, or a physician. Among the policies most pertinent to this discussion are those concerning mutual respect, government affairs, political activity, the Code of Conduct, photography and video, patient confidentiality, and use of resources including computers, E-mail & Internet access.
- **Write in the first person.** Where your connection to the Company is apparent, make it clear that you are speaking for yourself and not on behalf of the Company. In those circumstances, you may want to include this disclaimer: “The views expressed on this [blog; website] are my own and do not reflect the views of my Company.” Consider adding this language in an “About me” section of your blog or Social Media site profile or bio section, if you have identified the Company anywhere.
- **Use a personal email address** (not your CapellaHealth.com email address, if you have one) as your primary means of identification. Just as you would not use Company stationery for a letter to the editor with your personal views, do not use your work e-mail address for personal views.



- **If your blog, posting or other online activities are inconsistent with, or would negatively impact the Company's reputation or brand, you should not refer to the Company, or identify your connection to the Company.**
- **Be respectful and professional** to fellow employees, physicians, business partners, competitors and patients. Avoid using unprofessional online personas or pseudonyms.
- **Ensure that your blogging and social networking activity does not interfere with your work commitments.**
- **Ask your hospital's Marketing Director or CEO and/or the Company's Corporate Communications Department** if you have any questions about what is appropriate to include in your blog or social networking profile. Remember that if you wouldn't want your manager or others within the Company to see your comments, it is unwise to post them to the Internet.
- **Realize That Social Media Posts Are NOT Private.** Even though there are privacy controls on sites such as Facebook and other Social Media sites, you should assume that anything posted on a website will be seen by the general public, as well as your employer. Never forget that you are personally responsible for the content you publish. Don't rely on privacy settings because:
 - It is possible for those settings to be accidentally set to more open settings;
 - Friends can copy and paste what you post to more open forums; and
 - You may not remember everyone that has access to what you post.This is why Social Media tools such as Twitter, texting, or instant messaging services, should never be used to convey private or proprietary information, such as that about patients.
- **Don't Jeopardize Your Reputation and/or Future Employment Opportunities.** You should consider that everything you post online begins to build a lifetime record of you and your activities. Increasingly, employers will search this online history using Google or similar tracking tools. The Internet is your permanent record. What is posted on the Internet is cached (saved) forever and otherwise copied to innumerable other places out of your control. **The Internet is a pen, not a pencil.**

Guidelines for Official Participation

Some Workforce members may be interested in engaging in internet conversations for work-related purposes, or may be asked by leadership to participate in support of the Company's organizational objectives. Such engagement, including establishment of official external sites representing the Company, must be approved by and coordinated through the Hospital's Marketing/PR department, Human Resources department, and/or the Company's Corporate Communications department.

Code of Ethics

As the Company engages in conversations on the Internet, the following code of ethics applies, both in Company-sponsored sites and in comments on other sites.

- Information posted to any Company-sponsored site will be accurate and factual.
- The Company will acknowledge and correct mistakes promptly.
- The Company will delete spam and/or comments that are off-topic.
- The Company will reply to emails and comments, privately and/or publicly, as appropriate.
- The Company will link directly to online references and original source materials.



- Staff will disclose conflicts of interest and will not attempt to conceal their identity or that they work for the Company.

The Best Advertising Has Always Been Word-of-Mouth

Our Company's best advertising comes from patients and Workforce members sharing with their communities how we are living our values (or the Five Pillars) every day. A well-written Facebook or similar Social Media site post about a new service or the care that we provide to our patients may have far greater effect than a paid TV commercial. While that post may not have the same reach, the fact that it is coming from a person that is trusted in their community could mean the message has more weight. People listen to people they know.

It is OK to tell people you work for a Capella Healthcare affiliated organization your social profiles. We are proud of our Workforce members and we believe our reputation is enhanced when people know the quality of our Workforce.

We encourage Workforce members to talk about work online, but in a responsible way, avoiding the pitfalls we have outlined. We hope Workforce members will write about positive experiences that they have working with their co-workers. We hope Workforce members will educate their communities about the services we provide that can benefit their family and friends (online and "traditional" communications).

Workforce members are always welcome to share information from and links to the hospital's website with their friends. To assist you further, we will be working on communicating the types of things you should feel free to share on Social Media sites.