

SUBJECT: TOHONO O'ODHAM NATION HEALTH CARE SOCIAL MEDIA GUIDELINES	REFERENCE #
DEPARTMENT: TONHC	PAGE: 1 OF: 4
APPROVED BY: TONHC Policy & Procedure Committee	EFFECTIVE: 05/2017 REVISED: 02/2019

**I. PURPOSE:** This guideline describes how the Tohono O'odham Nation Health Care (TONHC) facilities utilizes social media. For the purposes of this policy, social media shall be considered technology and software that enable users to create and share content or to participate in social networking online. (but not limited to: blogs, Facebook, Twitter, YouTube, Instagram, WeChat, Vine and Snapchat). TONHC believes that participation in online communities is a valuable means of sharing and communicating. This policy is not intended to restrict the flow of useful and appropriate information.

**II. POLICY:** It is the policy of Tohono O'odham Nation Health Care to ensure procedures are in place to:

1. Minimize the business, legal and personal risks that may arise from an individual's use of social media, both during work time and non-work time;
  2. Protect the privacy and safety of our employees and patients;
  3. Prevent legal risks that may arise from taking adverse action against employees or potential employees due to use of social media;
  4. Outline an employee's obligation to avoid conduct that may violate local, state or federal law or other TONHC policies that may trigger claims of discrimination, harassment, retaliation or any other unfair employment practices against TONHC.
- A. Unauthorized employees may not participate in social media (social media networks or personal blogging of online content) from a network computer nor from a personal smart phone during work hours.
- B. E-mail and Internet access is provided to support TONHC purposes. TONHC understands that employees with this access may make incidental personal use of them. However, extensive personal use of these tools during work or non-work time is prohibited. Managers have the right and responsibility to determine extensive use and to revoke access privileges for abuse of the system.
- C. Blogging and other social networking activities are personal and should be done on the employee's personal time, unless said employee is assigned to perform an online activity as a part of the employee's job responsibilities.
- D. Employees may not disclose any confidential or proprietary information of or about TONHC, its affiliates, vendors or suppliers, including but not limited to, business and financial information.

SUBJECT: TOHONO O'ODHAM NATION HEALTH CARE SOCIAL MEDIA GUIDELINES	REFERENCE #
	PAGE: 2 OF: 4
DEPARTMENT: TONHC	EFFECTIVE: 05/2017
	REVISED: 02/2019
APPROVED BY: TONHC Policy & Procedure Committee	

- E. All employees are prohibited from using social media sites to provide medical advice or medical commentary or to use the social media site to make, recommend or increase referrals to physicians who are not employed by this facility.

### **III. RESPONSIBILITY:**

All management, employees, contractors, volunteers, and students of the TONHC.

### **IV. GUIDELINES:**

Employees of TONHC choosing to participate in social media in a manner where their association with the facility is apparent are expected to behave in a manner that is consistent with TONHC's Code of Conduct. Additionally, TONHC suggests the following guidelines for employees using social media for personal use:

- A. Write in the first person: When your affiliation to TONHC is evident, you should make it clear that you are speaking for yourself and not on behalf of the TONHC organization.
- B. Required disclaimer statement: In instances when your affiliation with TONHC is evident, it is a requirement to include a disclaimer, such as "The views expressed on this (blog; website) are my own and do not reflect the views of my employer."
- C. Be respectful: Refrain from posting any content that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or embarrassing to another person or entity.
- D. Always protect patient privacy: Never reveal any information that would make the identity of a patient apparent.
- E. Adherence to all laws and regulations: Individuals publishing content on social media should be reminded to adhere to all laws and regulations.
- F. Confidential information: Be careful not to deliberately or inadvertently disclose confidential information, either organization information or patient information.
- G. Identification: Identifying yourself as an employee of an organization associates all of the content you publish with your place of work. Only

<b>SUBJECT:</b> TOHONO O'ODHAM NATION HEALTH CARE SOCIAL MEDIA GUIDELINES	<b>REFERENCE #</b>
<b>DEPARTMENT:</b> TONHC	<b>PAGE:</b> 3 <b>OF:</b> 4 <b>EFFECTIVE:</b> 05/2017
<b>APPROVED BY:</b> TONHC Policy & Procedure Committee	<b>REVISED:</b> 02/2019

create content that is consistent with the professional standard to which you wish to be associated.

- H. Personal responsibility: Individuals are responsible for any content they publish on social media sites.
- I. Don't "fight" online: Avoid unnecessary arguments. Provide any conversation "counterpoints" in a respectful, factual manner.
- J. Trust your instincts: Review the content you are about to publish. If it gives you the slightest pause, delay publication until you are certain the content is appropriate.

#### **V. SANCTIONS:**

- A. TONHC has the right to monitor, prohibit, restrict, block, suspend, terminate, delete or discontinue an employee's access to the facility's Social Media Site, at any time, without notice and for any reason and in its sole discretion.
- B. Employees will be sanctioned if it has been discovered that protected health information has been breached.
- C. Any staff member who knowingly/willingly breaches confidentiality/security of data or information may receive, at a minimum, a written disciplinary warning; at a maximum, possible termination.
- D. If the breach of confidentiality was committed accidentally, with no intent to violate confidentiality or security of data/information, all efforts will be made to provide education to the responsible staff member to eliminate repeat incidents.
- E. Sanctions will be applied against employees who fail to comply with the security policies and procedures to ensure the integrity of protected health information.

SUBJECT: TOHONO O'ODHAM NATION HEALTH CARE SOCIAL MEDIA GUIDELINES	REFERENCE #
	PAGE: 4 OF: 4
DEPARTMENT: TONHC	EFFECTIVE: 05/2017
APPROVED BY: TONHC Policy & Procedure Committee	REVISED: 02/2019

**Employee Agreement:**

\_\_\_\_\_ I acknowledge I have received a copy of or access to the Tohono O'odham Nation Health Care's Social Media Policy and agree to read it.

\_\_\_\_\_ I agree to comply fully with the Social Media Policy.

\_\_\_\_\_ I understand my obligation to keep the patient's confidential protected health information private, which includes refraining from posting specific status updates, comments, videos and/ or photos that could disclose this information.

\_\_\_\_\_ I understand my obligation to the disclosure of such information may create irreparable injury to TONHC, or to our patients or providers.

\_\_\_\_\_ I agree to report any conduct that I believe to be illegal or to violate the social media policy to my Supervisor or Compliance Officer.

\_\_\_\_\_ I understand that any violation of the Social Media Policy will result in disciplinary action up to and including termination of my employment.

\_\_\_\_\_

Print Name	Signature	Date
------------	-----------	------

Annual Review:

Employee/Contractor/ Volunteer/Student Initials	Date	Manager/Supervisor Initials	Date

Original to Supervisor  
Copy to Employee