I. Policy Statement

The Social Media policy is designed to provide guidance to San Francisco Department of Public Health (DPH) and UCSF affiliated staff regarding use of social media including that which is DPH sponsored as well as the personal use of social media as it pertains to DPH work related responsibilities and equipment. It is the intent of this policy to support the effective and responsible use of social media, protect the privacy of DPH clients and staff and to ensure compliance with Federal HIPAA and State privacy regulations.

Social media includes items such as blogs, podcasts, websites, discussion forums, and social networks (i.e. Facebook, YouTube, Twitter, LinkedIn). See Appendix A Social Media definitions.

II. Application of Policy

a. This policy applies to all DPH workforce members including employees, residents, contracted staff, students, volunteers, medical staff and individuals representing or working at DPH.

b. This policy applies to the use of DPH- sponsored or approved social media, personal and non-DPH- sponsored social media.

III. Personal Use of Social Media

Use of personal social media accounts, including social media applications on personal electronic devices, should be restricted to incidental use during work time and in strict compliance with all other DPH and facility-specific policies regarding use of organizational assets.

a. Protecting Client Confidentiality

DPH employees shall never disclose client information through social media of any kind without the express written permission obtained through DPH or facility administration’s approval process. This includes:

- **Protected Health Information (PHI)** – Any medical identifiable information (oral, written or electronic) about the client’s physical or mental health, the receipt of health care, or payment for that care.

- **Patient Identifiable Information (PII)** – Any individually identifiable information regarding their; name, address, Social Security Number, account number, security code, driver’s license number, financial or credit account numbers, phone numbers, and Internet domain addresses, and other personal identifiers.

- Posting or hyper-linking to photos, images, video, recordings, text, or other information that could reasonably lead to the identification of a client.
b. You may not use a DPH issued-email address for personal use of social networking sites.

c. Staff members should consult with their supervisor if they are unsure whether any DPH related or client information is confidential.

d. Do not disclose private information of other DPH staff, or refer to other DPH staff in a defamatory, abusive or harassing manner.

e. Transparency: If you identify yourself as DPH faculty or staff in any online social medium or network or your affiliation with DPH could be presumed, you must make it clear that you are not speaking for DPH. Use this statement: “The views expressed here are my own and not those of my employer.”

f. Be aware that any social media conversation, whether public or private, may be subject to public disclosure.

IV. Use of DPH Sponsored Social Media

DPH related or sponsored social media accounts may be appropriate tools for achieving organizational objectives, however must be coordinated with and authorized through Administration.

a. Content shall be subject to administrative approval and staff may be required to discontinue use if deemed inappropriate by Administration.

b. DPH authorized accounts must follow all copyright laws.

c. Employees are expected to adhere to DPH rules of conduct and regulations when using or participating in DPH sponsored social media including protecting privacy of patient health information, privacy of other DPH employees and affiliates and confidential hospital information.

d. Administrators of DPH sponsored interactive social media (such as Facebook) shall include a disclaimer statement “The views expressed in this forum do not necessarily reflect those of the San Francisco Department of Public Health. We reserve the right to remove any posts or comments that violate patient confidentiality, are offensive, inappropriate or excessive.”

V. Compliance

DPH reserves the right to request to have online communications stop if DPH believes communications from an employee, physician, fellow, resident, volunteer, and/or students are in violation of organizational policies, values or local, state or federal laws privacy laws.
a. Violations of this Policy will be reported to the appropriate department. Violations will be investigated to determine the nature, extent and potential risk to the hospital. Employees who violate this policy will be subject to the appropriate disciplinary action up to and including fines for both individual and hospital, loss of licensure or termination.

- California privacy laws include the following possible penalties:
  - For the individual: fines up to $25,000 per violation ($250,000 maximum), possible misdemeanor charge if economic loss or personal injury, potential for civil action, Cal-OHI may notify licensing board for further investigation or discipline of individual providers. (AB211 - Civil Code 56.36 /Health & Safety § 130200)
  - Institutional fines: $25,000 initial violation per client ($250,000 maximum) (SB541- Health & Safety § 1280.15)

VI. Related Documents
A. DPH Electronic Data Security Policies – User Brief

Appendix A.
Definition of Social Media

Social media is the use of electronic and Internet tools for the purpose of sharing and discussing information and experiences with other human beings. When information is shared through the use these tools, conversation and interaction between groups of people is promoted.

The most common examples include the following:

- Blogs (Web logs), i.e. DiabetesMine, WebMD, YouTube videoblogging platform
- Instant Messaging (IM), i.e. AOL Instant Messenger- may include web-cams, Skype
- Music-sharing/File sharing
- Podcast, i.e. John Hopkins Medical Podcasts, CDC Travelers Health, dLife podcasts for diabetes
- Photo-sharing, i.e. Flickr
- Websites
- Social bookmarking, i.e. Del.icio.us, StumbleUpon, Connotea
- Social networking, i.e. Facebook, MySpace, LinkedIn, Twitter, PatientsLikeMe, DailyStrength, ReliefinSite
- Virtual Worlds
- Whiteboards (frequently used in virtual meeting settings)
- Wikis, i.e.Wikipedia.org, FluWiki, WiserWiki

Source: AHIMA Advantage e- Alert (Vol 12, Issue 40)
Dolan, Marsha; Wolter, Julie. "Using Social Media to Promote the Use of a Personal Health Record (PHR) and the Management of Personal Health Information to Consumers." 2009 AHIMA Convention Proceedings, October 2009.