



Title:	CM Social Media Policy	Effective Date:	Not Set
Categories:	Facility Wide	Approved Date:	10/23/2020
Prepared By:	Clint Strand (Director of Public Relations) Clint Strand		
Reviewed By:	Diane Blake (Chief Executive Officer)		
Approved By:	Diane Blake (Chief Executive Officer)		

Social Media Policy

Purpose:

Cascade Medical (CM) uses social media to connect with the public, the media and those within the healthcare field. Social media, while being fun and rewarding also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media. The term “social media” refers to a website or platform that allows the creation and exchange of user-generated content, which include all means of communicating or posting information or content of any sort on the internet, including to your own or someone else’s web long or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with CM, as well as any other form of electronic communication. Responsible use of social media on behalf of CM is critical to our success.

Guidelines:

Personal Use

CM recognizes that employees may choose to express themselves by posting personal information on social media platforms or by making comments on sites hosted by other persons, groups or organizations. When your connection to CM is apparent, please be clear that you are speaking for yourself and not on behalf of CM.

This right of expression should not:

1. Interfere with the operation of the CM
2. Violate patient privacy and/or all HIPAA laws
3. Reveal any confidential or privileged information about CM, its patients, its staff or its contractors

Staff should be mindful that our patients come from all walks of life, and we encourage employees to use the same standards of behavior online as they would in person. Public comments, in any forum – including on personal media accounts – that contain racial slurs, profane language or acronyms for profane language, express bigotry toward a group based on race, religion, national origin, sexual orientation, gender or gender identity may be considered unbecoming conduct.

CM employees must never use their professional e-mail account or password in conjunction with personal blogs or personal social media accounts.

Personal blogging or social media activity is not considered business-related and should be done during personal time only. If the content is related to healthcare or your job at CM, you must not represent yourself as a spokesperson for CM.



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Professional Use

1. The Public Relations Director will be the primary curator of CM’ social media presence. No one can post on CM’s timeline without approval. However, we recognize our strength in the diversity of our collective perspectives and experience, and we want our Facebook page to reflect that. If staff or board members have ideas, photos from trainings or testimonials they would like to share, please send it to the Public Relations Director.
2. All officials are expected and required to conduct themselves in a manner consistent with CM’s policies and standards of conduct.
3. Unless a staff member or official has been designated to serve as a spokesperson, they should never represent themselves as a spokesperson for CM or any department therein. If a staff member notices a negative comment or post that involves CM, please notify a supervisor or public relations director.
4. Only individuals authorized by CM may publish content to CM’s website or social media accounts.
5. Officials should be honest and accurate when posting information or news, and should quickly correct any mistakes, misstatements and/or factual errors in content upon discovery.
6. Officials should be mindful that posting content regarding CM-related matters could inadvertently result in the violation of the Open Meetings Law if enough other public officials engage on the post, resulting in a quorum. If this occurs, the online conversation should immediately cease with no further posts by the officials and the administration should be notified accordingly.
7. CM employees may not publish information on agency social media sites that include:
 - Confidential information
 - Copyright violations
 - Profanity, racist, sexist, or derogatory content or comments
 - Partisan political views
 - Content or comments that violate any of CM policies or procedures around harassment, discrimination, or hostile behavior.
8. All HIPAA regulations apply to social media. To reduce risk, any non-staff subjects shown in photos, written content or video must sign a model release form, available through the Public Relations Director. There is one exception: If the photo was taken at a community event, and there is no pretense that the people shown are patients, we do not need a model release form.

Approval and Registration



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The creation of all CM social media accounts and websites shall be (1) approved by the Chief Executive Officer prior to publication; (2) published using approved social networking platform and tools; and (3) administered in accordance to this policy and public record laws.

The role of staff on social media

We encourage staff to engage by:

- Liking the page
- Suggesting content or ideas to the Public Relations Director.
- Sharing posts with groups or friends
- Commenting on posts – keep it positive, non-political and respect HIPAA laws
- Reporting any negative comments, HIPAA concerns and other red flags

Responding to public comments and reviews

Only those designated as spokespersons may respond on behalf of CM. If comments or reviews are critical in nature, our first step is to move the conversation offline. Never volunteer any information about a case or incident, and do not try to resolve the issue via social media. Politely thank them for their concern and refer them to the appropriate party, such as the risk management officer. We will delete any comments that are defamatory, harassing, threatening, slanderous, hateful or disruptive. Spam and comments by anonymous users or those using fake names will also be deleted.

Oversight and Enforcement

Employees representing the CM through social media outlets or participating in social media features on agency websites must maintain a high level of ethical conduct and professional decorum. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow coworkers or otherwise adversely affects employees, patients, customers, supplier or people who work on behalf of CM or CM legitimate business interest may result in disciplinary action up to and including termination.

Moderation of Third-Party Content

This agency social media site serves as a limited public forum and all content published is subject to monitoring. User-generated posts will be rejected or removed (if possible) when the content



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- is off-subject or out of context
- contains obscenity or material that appeals to the prurient interest
- contains sensitive personal information or violates the privacy of a staff or patient of CM
- is threatening, harassing or discriminatory
- incites or promotes violence or illegal activities
- contains information that reasonably could compromise individual or public safety
- advertises or promotes a commercial product or service, or any entity or individual
- promotes or endorses political causes, campaigns or candidates

Contests/Giveaways

Occasionally a community partner will gift giveaway items to CM for promotional purposes. We may utilize those prizes to engage our social media audience. Employees and their immediate family members (spouse, children), will not be eligible to win.

Social Media Advertising

Advertising will be reserved for certain hospital-led campaigns highlighting a specific service.

Public Records Law

Social media and websites owned by CM are subject to applicable public records laws. Any communication posted by the CM and communication received from citizens, is a public record.

This policy is not intended to restrict or interfere with any employee's federal or state labor law rights, including any and all rights under the National Labor Relations Act, or any whistle blower protections under federal or state law.