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Title: HIPAA Administrative Requirements Security Policies For All Staff-- **Social Media Use**		
Regulatory Authority: HIPAA Regulations, FERPA Regulations, ORC, OAC		
Effective Date: 01/19/2021		
Reviewer/Job Title: Director of Operations		

(A) Social Media Use

Social networking sites, notably Facebook but including many others, have become a significant communication medium in our world. The board mandates specific guidelines for the use of these sites both limiting certain activities to insure confidentiality and privacy of individuals being served while permitting other uses that advance the mission or the board, for example with fundraising.

Audience

All staff

1) **Definitions**

   a) Social Networking Sites – means sites that enable linking with other people, sharing information, and communicating. Popular examples include Facebook, Twitter, LinkedIn, Google+ and others.

2) **Board Sponsored Use**. The HIPAA Privacy officer or Superintendent may approve the establishment of a board sponsored Fan Page or Group. The Privacy Officer and/or superintendent will provide guidelines for use in the event of any board sponsored use of Facebook or similar social network.
3) **Personal use of Facebook and other social network sites by employees**.
   a) Employee Personal use of Facebook.
      i) **Employee Use During Work Hours**. During work hours, employees are expected to focus on work-related activities. Consequently, in general, they are expected to not keep Facebook open as management believes that this communication medium has the potential to be distracting and has the potential to reduce the employee's productivity.
      ii) **Employee Use at any time**. Facebook is a new communication medium. The medium is semi- public; while it includes many options for specifying levels of privacy, Facebook users often share private information in unintended ways. Further, the Facebook site has a history of malfunctions and security breaches. Consequently, any use of Facebook has the potential to become a public communication, so, employees of the board must follow the following guidelines: (1) **Sharing of work-related activities**. Employees should limit the sharing of

any Board related information to information that they would be acceptable to be made public, for example, on the front page of a major newspaper.

(a) Examples of information that would be appropriate to share on one's wall include:
   (i) The employee's excitement and satisfaction with the work and mission of the board.
   (ii) Details of an upcoming public event sponsored by the board, such as a local "Special Olympics" day.
   (iii) The name of a friend who is a co-worker at the board.

(b) Examples of information that would be inappropriate to share on one's wall include:
   (i) The name of an Individual receiving services from the Board.
   (ii) A complaint about the Board such as displeasure with a supervisor or co-worker.
   (iii) Any Protected Health Information, or PHI, (which includes facial images of Individuals being served).

   Employees are further encouraged but not required to limit communications on Facebook to those that would portray them in a professional manner.