

	<b>SECTION:</b> <b>Corporate Compliance</b>		<b>NO:</b> <b>C – 20.0</b>		
	<b>TITLE:</b> <b>Social Media Guidelines for AAD and Personal Accounts</b>		<b>DISTRIBUTION:</b> <b>Corporate Compliance Manual</b>		
<b>Effective Date:</b> 4/15/19	<b>Approved by:</b> Chief Compliance Officer				
<b>Revision Date:</b>	12/1/2021				

## Background

Social networking sites can be an effective way to keep in touch with colleagues; in medical education, wikis and discussion boards are already heavily utilized. Social media such as Facebook, LinkedIn, Twitter, TikTok and Instagram have grown in popularity and application, allowing users to post content and share with virtually anyone. Organizations, including healthcare institutions and medical practice groups, are rapidly integrating the use of social media into their education, outreach and marketing strategies.

While this creates new opportunities for communication and collaboration, it also creates vulnerabilities for individuals and groups, especially those involved in the healthcare environment. Depending on our privacy settings, anyone with access to the internet can see our profiles, photos and posted opinions and can share them anywhere. The potential impact on one's image and the institution's image is an important consideration.

## DEFINITION

Social networking is a platform to build social networks or social relations among people who share similar interests, activities, backgrounds or real-life connections. A social network service consists of a representation of each user (often a profile), his or her social links, and a variety of additional services. Social network sites are web-based services that allow individuals to create a public profile, create a list of users with whom to share connections, and view and cross the connections within the system. Most social network services are web-based and provide means for users to interact over the Internet, such as e-mail and instant messaging. Social network sites are varied and they incorporate new information and communication tools such as mobile connectivity, photo/video/sharing and blogging.

## PURPOSE

This document includes Anne Arundel Dermatology's ("AAD") policy limiting the use of social media in office and surgery clinic spaces, corporate policies that apply to the use of social media and best practice guidelines for AAD medical staff and licensed independent practitioners, employees, and others who perform work for AAD (hereafter referred to as workforce members). Social media includes text, images, audio and video communicated via such tools as:

- Blogs and micro-blogs,
- Social networks;
- Professional networking sites
- Profession-based social networks;
- Video sharing;
- Audio sharing;
- Photo sharing;

- Social bookmarking;
- Public comment sections on webpages (such as those for online news sites);
- User created web pages; *and*,
- Any other internet-based social media applications similar in purpose or function to those applications described above.

## **POLICY STATEMENT: LIMITING USE OF SOCIAL MEDIA IN OFFICE SPACES**

Use of social media is prohibited while performing direct patient care activities or in office or department work areas, unless social media use in these areas has been previously approved by a supervisor. Workforce members should limit their use of social media in medical and corporate office spaces to rest or meal breaks, unless social media use for business purposes has been previously approved by a supervisor.

## **GUIDELINES: SOCIAL NETWORKING GUIDELINES**

### **Personal Social Media Guidelines**

1. **Think twice before posting.** Privacy does not exist in the world of social media. Consider what could happen if a post becomes widely known and how that may reflect on both you and Anne Arundel Dermatology. Search engines can turn up posts years after they are created, and comments can be forwarded or copied. If you would not say it at a conference or to a member of the media, consider whether you should post it online. If you are unsure about posting something or responding to a comment, seek advice from your practice manager, Medical Director, Marketing Office, or Compliance Office.
2. **Anonymity is a myth.** Write everything as if you are signing it with your name.
3. **Remember your audience.** A presence in the social media world is or easily can be made available to the public at large. This includes prospective and current employers, colleagues, patients and their families and peers. Consider this before publishing to ensure the post will not alienate, harm or provoke any of these groups.
4. **Strive for accuracy.** Get the facts straight before posting them on social media. Review content for grammatical and spelling errors. This is especially important if posting on behalf of AAD in any capacity.
5. **Familiarize yourself with and use conservative privacy settings regardless of the content on your profile.** Practice restraint when disclosing personal information on social networking sites; your audience is everyone.
6. **Consider your professional image.** As a rule, post online only content that you would be comfortable having your employer or colleague see. Employers often search social networking sites during the hiring process. Always consider the professional image you wish to present to your employer, coworkers, patients and their families. Even seemingly innocuous images and comments can diminish the respect and trust that others have for you.
7. **Do not “friend” patients on social networking sites.**
8. **Managers are discouraged from engaging in social media interactions with their subordinates, even if a subordinate initiates contact.** AAD discourages such interactions because of the potential for

misunderstandings and undesirable effects on supervisory relationships.

9. **Ask permission before posting medically-related content on social media sites.** If you are medical staff, ask permission from someone with appropriate authority in your chain of command, including the Medical Director or AAD leadership. If you are an employee, ask permission from your practice manager or your direct supervisor.
10. **If in doubt, do not post!**
11. **Do not engage in cyberbullying. Do not harass, libel, slander or embarrass anyone.** Do not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful or embarrassing to another person or entity. Individuals may be held personally liable for defamatory, proprietary or libelous commentary.
12. **Use disclaimer language.** If you acknowledge your AAD affiliation or you may be otherwise known or presumed to be affiliated with AAD, include disclaimers in your online communications that indicate you are not speaking officially on behalf of the organization.

For example:

- a. “The postings on this site are my own and do not represent the positions, strategies or opinions of my employer (or Anne Arundel Dermatology)”; *or*
  - b. “This is a personal website, produced in my own time and solely reflecting my personal opinions. Statements on this site do not represent the views or policies of my employer, past or present, or any other organization with which I may be affiliated. All content is copyrighted.”
13. **Even disclaimers are not failsafe.** Standard disclaimer language may not by itself exempt AAD providers, managers and executives from a special responsibility when blogging. By virtue of their position, providers, managers and executives must consider whether personal thoughts they publish may be misunderstood as expressing AAD positions. Managers should assume that their team may read the blog.
  14. **Disclose your relationship.** If you make comments that could reasonably be construed as an endorsement of AAD’s services, disclose your relationship with Anne Arundel Dermatology.

#### **Business – AAD Personality Social Media Requirements**

1. **Get Permission/Ownership.** If you believe having an AAD owned personality will improve your business you will need to request permission from the VP of Marketing. Once permission is obtained, you agree that the Business – AAD Personality account will follow the policies set forth below. Additionally, AAD owns all approved Business – AAD Personality accounts and has the right to post, delete or deactivate at any time for any reason. Each Business – AAD Personality account will have a form that needs to be submitted and approved prior to opening/posting an account.
2. **Naming Account.** The VP of Marketing will assist in the naming of your account. If you already have an account (with followers) that you would like to use all account information must be presented to the VP of Marketing for approval. All new accounts will tie you to AAD, i.e., JaneDoePA\_AAD or AAD\_PADoe or something along those themes.

3. **See Above.** You must follow personal social media policies; 1-11.

**4. Waivers/HIPAA Authorization.** Patient privacy must be maintained in all communications. Do not disclose information that may be used to identify patients or their health condition, without the express and written permission of the patient. An Official AAD Media authorization is a must to be signed by all parties that could potentially be seen/mentioned in a social post. As a best practice, when applicable please provide a pre-approval to all parties in a social post regarding the content of said post.

5. **Trial Period.** All posts during the trial period shall be run by the Vice President of Marketing. The trial period shall last three (3) months. The trial period can be shortened or lengthened based on the Vice President of Marketing's judgment.

6. **Do's and Don'ts.** Below are some basic Do's and Don'ts for a Business – AAD Personality

**Do's**

- Have a great bio.
- Post consistently.
- Follow AAD accounts and industry accounts (example: @coolsculpting)
- Interact with your audience.
- Reply to people who mention you, Anne Arundel Dermatology or Derm Beauty
- The more you interact the more people will interact with you.
- Use Hashtags
- Think about your goal for each post.

**Don'ts**

- No Debates. We do not want to pick a side and come off as it is our way only.
- No Bashing. Do not bad mouth products, reps, competitors.
- No emotional reacting or smart remarks to negative comments personally or to the company.
- Do not be a robot. Show emotion, have fun with posts and interaction, be creative.
- Do not post more than three (3) times a day.
- Do not screenshot images to repost.
- Do not post on the same topic multiple times a day.

## **SUMMARY OF OTHER RELEVANT AAD POLICIES**

1. Confidential, proprietary and trade-secret information about AAD or its affiliates, employees or other workforce members may not be posted. Such posting violates the Compliance Code of Conduct.
2. Patient privacy must be maintained in all communications. Do not disclose information that may be used to identify patients or their health condition, without the express and written permission of the patient, and remember that even de-identified information may be recognized by patients, their families or their employers. Unauthorized or inappropriate disclosure of confidential patient information is a violation of the Health Insurance Portability and Accountability Act (HIPAA). AAD takes violations of privacy seriously and sanctions may be imposed for violations in accordance with HIPAA and Human Resources policies. Relevant AAD Compliance policies include: AAD-H 10.0, Use and Disclosure of Protected Health Information.

3. Intellectual property rights must be preserved. If you have any questions, call the Marketing Office.
4. Company or practice site computers, internet access, networks and time on the job is subject to a number of specific rules and policies, including but not limited to the following:

AAD workforce members are subject to state law and AAD policies that prohibit the use of computers and networks for most personal use except under certain circumstances.

AAD resources may not be used to: support, promote, or solicit for an outside organization or group unless otherwise provided by law and policy; assist an election campaign, promote or oppose a ballot proposition or initiative, or lobby the state legislature; advertise or sell for commercial purposes; conduct an outside business or private employment or other activities for private financial gain.

The company may: monitor the use of company resources; determine whether frequency or volume of use complies with the law; counsel workforce members as needed; and revoke access privileges, if necessary.

5. In general, do not use social media sites for personal, non-work-related purposes when you are supposed to be doing your job. Be aware there may be more limitations or specific policies governing the use of social media depending on where you work. AAD practice sites or corporate departments may also set more restrictive or specific policies regarding access to social media sites. When in doubt, check with your supervisor. Any employee, on site contractor or workforce member who violates published AAD compliance or other policies regarding the personal use of company resources, facilities, computers and equipment, or policies regarding outside work and conflict of interest are subject to appropriate disciplinary or corrective action, including dismissal.
6. Unless you are serving as an approved, official spokesperson for AAD, online communications are your personal opinions and do not reflect the opinion of AAD or its affiliated entities. Each workforce member is personally responsible for his/her posts (written, audio, video or otherwise). (See *Guidelines, 11. Use Disclaimer Language*)
7. There should be no expectation of privacy when using an AAD account to visit internet websites. Email communications and internet use may be subject to disclosure under state or federal laws or for audit purposes.
8. Adhere to the rules that apply to all other aspects of your responsibilities as an AAD workforce member, including professionalism, integrity, confidentiality and security. Relevant AAD policies include, but are not limited to, the following:
  - a. AAD Policy on Professional Conduct
  - b. AAD Compliance Code of Conduct
  - c. AAD Privacy Policies
  - d. AAD HIPAA Security Policies

## ADDITIONAL READING

- The American Medical Association Opinion 2.3.2 (2018) Professionalism in the Use of Social Media (<https://www.ama-assn.org/delivering-care/ethics/professionalism-use-social-media>)
- Avoiding the Pitfalls of Social Media: Guidance for Dermatologists (<https://www.medpagetoday.com/reading-room/aad/general-dermatology/95691>)