



POLICY:

It is the policy of Willapa Harbor Hospital to publish to social network sites to communicate with the public about hospital and clinic services, events, programs, news and/or information.

PURPOSE:

This policy covers the District's internet social networking sites, website, blogs or any online forum, collectively referred to as "internet postings" in this policy. This policy applies to employees, medical staff, students, contractors, vendors or other persons who work for the District.

The District has the utmost concern for patient privacy. Internet postings may not disclose any confidential patient information and, must adhere to all standards outlined in the Health Insurance Portability and Accountability Act (HIPAA). Responsibility to comply with policies or contractual obligations applies regardless of medium or of your location when posting information to Internet sites. Confidential information must be safeguarded in all instances when conducting business on behalf of the District.

RESPONSIBILITIES:

The Marketing Manager is the gatekeeper for ensuring compliance with this policy. Any employee, medical staff, student, contractor, vendor or other person must be approved by the Marketing Manager before they can provide content to the District's social media sites. All contributors to the social media sites are responsible for complying with this policy. Employees and people approved to be contributors to the social media site will be responsible for reading and complying with the policy.

The Marketing Manager is also responsible for working with the compliance officer on questions of public records retention and patient privacy, and for working with other appropriate leaders to respond to patient questions and complaints about quality, billing and other issues.

PURPOSE OF SOCIAL MEDIA:

The District uses social media for several purposes, including:

- Promote the District's events and services
- Inform and engage the public on health issues
- Promote partnerships with other local caregivers and service providers
- Promote the expertise of staff and caregivers
- Reputation management
- Build community

INAPPROPRIATE USES AND CONTROLS:

Not all subjects are appropriate for discussion on the District's social media platforms. It is our practice to review and approve public posts before they are published to our page. We also reserve comments made on our postings with the sole right to review, edit and/or delete or hide any postings deemed inappropriate. Postings and comments, including but not limited to the following, may be hidden, deleted or edited:

- Conduct or encouragement of illegal activity
- Personal attacks or defamatory statements directed toward another individual, including Willapa Harbor Hospital and/or Willapa Medical Clinic staff, providers, executives or board members
- Content that violates HIPAA or other confidentiality regulations

- Sexual content or links to sexual content
- Profane language or content or "hate speech" (for example, including but not limited to racial, ethnic or gender-bashing language)
- Individual questions about issues such as billing or medical advice
- Content that promotes, fosters or perpetuates discrimination of any kind
- Comments not relevant to the topic of discussion
- Misleading comments that may compromise the health or safety of a person or the public in general
- Off-topic and redundant comments (this includes promotion of events, groups, pages, Web sites, organizations and programs not related to, approved by, or affiliated with the District. Also includes repetitive or spam content and solicitations of commerce)
- References to third-party websites
- Other comments that the marketing manager and/or administration deems inappropriate or harmful

The District has the right to remove and/or block fake, anonymous or AI accounts and/or individuals that violate this policy.

PROCESS FOR LEADERSHIP NOTIFICATION:

Social media postings sometimes grow into larger problems for hospital reputation and operations. Here are some of the factors that might trigger the notification and consulting with health system leadership:

- An allegation of a serious patient safety or privacy violation
- Media attention or inquiry
- Any kind of threat to patient or public safety

Staff will follow the following steps whenever a significant issue arises on social media:

- Review the complaint. Based on the content, does it need to be hidden from Facebook and/or Instagram audiences because it violates standards?

Notify the top two relevant executives at the same time:

- **Quality issues:** Chief Operating Officer and Quality Officer
- **Patient privacy:** Chief Executive Officer and HIPAA Privacy Officer
- **Billing and other finance issues:** Chief Executive Officer and Chief Finance Officer

Executive notification should include:

- Link to (or screen shot of) the social media posting

PLATFORMS NOT MANAGED BY THE DISTRICT:

This policy only refers to those social media platforms that are managed directly by the District. In the case when content about the District appears on a platform or channel not managed by the District, it is our policy to respond respectfully.

In cases when patient concerns about care or billing are the topics, we will facilitate direct contact between the poster and appropriate staff.

In cases where the postings are highly derogatory, threatening to the reputation of the organization, grossly inaccurate or threatening some kind of harm, it may be appropriate for staff to reach out to the moderator of the platform. If time allows, this should be done in consultation with leadership.

GUIDING AUTHORITIES:

Relevant RCW statutes that guide and affect this policy include:

RCW 70.02, RCW 9.73, RCW 71.34. Federal is 45 CFR parts 160, 162, 164, 170, 485

Additional resources:

Additional resources for learning about the use of social media by healthcare providers include:

- a. American Hospital Association
- b. National Center for Biotechnology Information
- c. <https://blog.hootsuite.com/social-media-healthcare/>