

GUIDELINES: Social Media Guidelines for UF&Shands

GUIDELINES STATEMENT: Any HSC or Shands unit may create and maintain social media sites for their respective programs, services, divisions and initiatives, as long as these accounts are used for appropriate official purposes. All accounts must be approved prior to creation by UF&Shands' Chief Communications Officer (delegated to perform this task by the UF Sr. Vice President of Health Affairs) and accounts created by UF units also must receive prior approval from University Relations.

UF&Shands units must follow the enclosed guidelines for managing social media accounts. These guidelines are additions to the UF Social Media Use, Guidelines and Policy Implications document on the UF HR website (http://www.hr.ufl.edu/emp_relations/policy/social_media.asp) and Shands Social Media Policy (HR#322).

PURPOSE: To promote effective and beneficial use of social media accounts by UF&Shands units.

PROCEDURES:

- I. Purposes and goals of social media accounts:
 - a. To protect the space with our name and branding that will serve as a reliable source for health and system information.
 - b. To increase awareness of our products, services, programs, providers and events through notes, status updates, videos, photo galleries and other resources.
 - c. To become more transparent to our customers and community and to engage in appropriate two-way communication with them.
 - d. To discover issues that are important to our customers and clients and to develop marketing and PR strategies and responses around those issues.
 - e. To assist with development, fundraising and employee recruitment efforts.

- f. To assist with website enhancements by using the network(s) as a sounding board for new ideas, architecture and design. By tracking the response elicited from different types of shared information (video, events, interactive media, etc.), we can determine what multimedia elements should be added to the integrated site.
- g. To educate the community about new discoveries, technologies or clinical services in the UF medical community.
- h. To assist in student recruitment for the HSC colleges.
- i. To share research findings with the healthcare community, other research professionals, the general public and the media.

II. Developing social media accounts

- a. Staff from UF&Shands Communications maintain corporate accounts on Twitter, Facebook and other social media platforms. Because social media updating and monitoring can be resource intensive, other departments are encouraged to submit content to UF&Shands Communications staff for distribution.
- b. Any HSC or Shands unit may create and maintain social media sites for their respective programs, services, divisions and initiatives, as long as these accounts are used for appropriate official purposes. All accounts must be approved prior to creation by UF&Shands' Chief Communications Officer (delegated to perform this task by the UF Sr. Vice President of Health Affairs) and accounts created by UF units also must receive prior approval from University Relations. See more information on starting an account, below.
- c. Pages are to be used for communication with external audiences primarily, and units are discouraged from using their pages/Twitter accounts primarily for internal communication. Using social media accounts primarily for employee purposes is problematic because these platforms are controlled by outside companies and UF&Shands cannot guarantee the privacy of information sent via these platforms. Additionally, not all UF&Shands employees choose to use social media and units should not isolate those employees from internal communications by using these platforms.
- d. After an account is authorized, the unit managing the account will designate two or more unit **social media managers** responsible for administration of the page. The email address associated with the page must be a shared UF or Shands email account that forwards mail to all of the unit's social media managers. Social media managers will receive training on best practices, writing for the web, content monitoring, social media risks and the basics of each social media platform. Training and support will be provided by social media coordinators in UF&Shands Communications and the social media managers.
- e. Approved accounts will be listed on the UF&Shands integrated website, and some content from registered pages may be shared through the corporate pages. By registering your page, you will have access to additional information, training and in-services, as well as a wider audience. In-services will be held every six months, and emails with tips and content suggestions will be sent out weekly.

- f. Registered pages will also receive support from the social media monitor in their college, official center/institute or Shands unit, and from social media experts in UF&Shands Communications.
- g. Facebook pages are to be used for long-term communication plans. Departments may not create Facebook pages exclusively for events or short-term projects. To promote such events or projects, use a UF&Shands Facebook account for a unit sponsoring or promoting the event or project. Facebook “events” are good ways to promote UF&Shands events.
- h. Social media accounts must follow UF social media guidelines and policies, as well as these social media guidelines.

III. Managing social media accounts

- a. To help ensure official UF&Shands accounts follow guidelines and policies, one person from each college and from each official center, institute or Shands unit (the top communications professional for that entity, or his/her designee) will monitor the social media accounts operated by units of that entity (eg: departments, divisions, offices, unofficial offices/centers, etc.).

This person will be called a “**social media monitor**” and must frequently check the social media accounts assigned to him/her for problems or policy violations and communicate with the social media managers of these unit accounts as needed. The monitor will also serve as a resource for the managers, offering guidance and tips as appropriate, and will meet with each manager several times a year.

- b. Members of the UF&Shands Communications social media team will perform cursory reviews of official UF&Shands social media accounts several times a year and discuss findings with the appropriate social media monitor at meetings held quarterly. Social media teams for UF&Shands Communications will hold bi-annual meetings with social media managers and monitors to discuss strategy, etc.
- c. In the event that the social media monitor finds a violation of law (eg: HIPAA, FERPA, or other applicable laws) or of UF policy on an official UF&Shands social media account, he or she will send a letter to the unit’s social media manager and chief faculty member describing the violation and requesting that it be removed immediately. Known or suspected privacy violations must be reported to the appropriate Privacy Office.

If the UF&Shands Communications’ social media team finds such a violation, they will notify the social media monitor. Other, less serious issues can be addressed in meetings or through informal communications.

- d. Pages should be updated regularly – ideally, at least once per day, with a variety of content.

- e. Social media monitors from the colleges, official centers/institutes or Shands units will monitor pages for content updates. If they discover a page has not met content update standards, the social media manager will be asked to submit a content update editorial calendar and meet with social media monitor/UF&Shands Communications representative for further training. If chronically uncorrected, the UF&Shands Communications social media team will ask you to remove the page and submit content to the college, department, HSC or Shands page. Your page will then be removed from the UF&Shands integrated site hub. This process minimizes the amount of inactive pages within our brand.
- f. UF&Shands Communications will maintain a catalog of all UF&Shands-sanctioned social media sites, including each site URL, the name(s) of each site's social media managers and corresponding social media monitor.

IV. Monitoring social media accounts and addressing risk

- a. Social media managers will be responsible for monitoring their site(s) during and after business hours. When possible, privacy settings should be set so that users may not upload their own photos or videos to the sites.
- b. Patient Privacy: Use of social media, even in a personal capacity, must comply with the Health Insurance Portability and Accountability Act (HIPAA). For a general overview of HIPAA, please visit: <http://privacy.health.ufl.edu/about/overview.shtml>
 - i. Protected health information includes photographs and videos of the patient, even if the patient asked for the photo/video to be made or consented to it being made. It is best to return such photos to the patient, as long as no other patients are in the photos.
 - ii. Do not post patient information, even if you think you have "de-identified" it.
 - 1. It often is possible to identify patients even if you do not include their names or other obvious identifying information.
 - 2. Realize that details, such as your name, your place of work/study and the date/time stamp can make it easy to identify patients you describe, particularly to the patients themselves and their families and friends.
- c. The most important aspects of monitoring comments are keeping protected health information (PHI) limited.
 - i. Posting One's Own PHI - If an individual identifies himself or herself as a patient and then voluntarily shares his or her own PHI with the audience via a comment, we may allow the comment to remain on the site.

- ii. Posting of Another's PHI – Comments, photos, videos or any other type of content containing PHI pertaining to another person (e.g., comments about a friend or neighbor), must be deleted immediately by the page administrator or their designee when discovered. See exception pertaining to parents/legal guardians commenting about their own children below. **Before deleting content, please take a screen shot and send the image to UF&Shands Communications, along with a note of when the content was deleted and why.**

Exception: UF&Shands social media sites may allow parents of minors to post comments containing the PHI about that parent's own child when there is a clear admission that the "poster" is that parent of the minor. Such comments, although permissible, may be removed per additional removal criteria listed below.

- iii. Posting of Super-Confidential Health Information - Comments containing super-confidential health information, regardless of who posts the information, must be deleted immediately when discovered.

Super-confidential health information: Certain health information incurs an additional layer of confidentiality and is considered to be both privileged and confidential. This includes information pertaining to diagnosis, treatment, and/or examination related to Mental Health; Substance Abuse (including drugs or alcohol); HIV/AIDS (and testing of); Sexually Transmitted Diseases, and Genetic Information as defined and protected by specific federal/state laws and regulations.

- iv. Humanitarian/Overseas Trips: Patients treated on international humanitarian trips have a right to privacy, even if they were treated outside of the U.S. Treat these patients' identities and medical information, as well as photos, videos and audio recordings featuring them, with the same respect you would show those of a patient receiving care in the United States.

Disclosing information about a patient treated in another country could be a violation of that country's privacy laws, as well as U.S. and Florida laws and UF and Shands policies. See also: the UF Social Media Use, Guidelines and Policy Implications document on the UF HR website (http://www.hr.ufl.edu/emp_relations/policy/social_media.asp) and Shands Social Media Policy (HR#322).

Before you post information, pictures/videos, recordings featuring patients from an international humanitarian trip, please contact the appropriate Privacy Office for approval.

Official UF visits to other countries may invoke national privacy protections different than those in the United States. When data are collected and exported, for example individually identifiable photographs, the national laws of the country visited must be followed.

- d. Confidentiality of student and applicant records: Federal laws (including the Federal Education Records and Privacy Act), Florida law and UF regulations governing the confidentiality of student (education) and applicant records (and information from such records) apply to social media use. Information from student, alumni or applicant records (including but not limited to academic records, disciplinary records, correspondence through e-mail or other means, or any other records concerning students at the University of Florida or applicants to the university) should never be released via social media. For more information about the privacy of student and applicant information, please view the following resources:
- i. UF Privacy Office web-site: <http://privacy.ufl.edu/studentfaculty.html>
 - ii. Florida Statute 1006.52
- e. Research and intellectual property: Releasing unpublished research data or unprotected intellectual property would impair its protection. In keeping with UF's Intellectual Property Policy (www.research.ufl.edu/otl/pdf/ipp.pdf - 2006-06-09) and Shands Intellectual Property policy (HR 313), you may not release unpublished research data or unprotected intellectual property through social media.
- f. Other forms of restricted information: Revealing other forms of restricted records, data, or information via social media is strictly prohibited. Records so protected include but are not limited to Social Security numbers, financial information, employee medical information, limited access employee records pursuant to Section 1012.61, Fla. Stat., trade secrets, copyrighted materials, and other materials that the university has agreed shall be maintained confidentially.
- g. Misrepresentation: You may not portray yourself as acting on behalf of the university or any part of the university, such as the Health Science Center, IFAS, a college, department or any other unit, or present a social media account as an official university account unless authorized to do so. When using social media in a personal capacity, you must take reasonable precautions to indicate that you are engaging in the activity as a private person and not as an employee, agent, or spokesperson of the university.

Permission to use any University of Florida service marks, trademarks, or logos must be requested from University Relations at 352-846-3903.

Inappropriate comments: All content is bound by the [UF Acceptable Use Policy](#). Further, users are expected to abide by applicable laws, regulations, rules and policies including the [University Student Code of conduct](#), the University's [Sexual Harassment Policy](#), and other regulations and policies concerning public communications.

When discovered, a unit social media manager must immediately remove inappropriate comments about the organization or a staff member that are offensive, abusive, and/or insulting.

UF&Shands social media sites may allow negative comments relating to quality of care that do not meet the removal criteria above, unless such comment contains PHI pertaining to another person or

is super-confidential in nature. Further in this document we share instructions about how to respond to such comments.

Accounts run by UF units are subject to public records laws and freedom of speech considerations. For these reasons, comments and other content added by users other than the social media managers should be removed from the social media pages only when there is a very compelling reason to do so. Content should not be removed solely because the managers or other unit personnel dislike it, or solely because it puts UF&Shands in a negative light.

- h. If an individual offers a comment that would serve as a follow-up marketing or public relations patient testimonial or newsworthy story, the UF&Shands Communications team will contact the individual to secure an *Authorization to Use or Disclose Patient Information for Communications Media* form. This consent form will cover not only distributing the message through social media sites, but also use with other UF&Shands marketing, promotion and news efforts.
- i. Responding to comments: Responding to a patient who greets you in a social media platform is OK. Providing medical advice or information is not, even if the patient requests it. Good guidelines for dealing with patients who seek medical advice through social media can be found at: <http://www.33charts.com/2009/10/9-things-to-consider-when-patients-contact-you-via-social-media.html>.

Not all comments will require a response; some comments may be simple statements or praise, or tips for other Shands or UF customers. Or they may be totally unrelated to Shands or UF but may be healthcare related.

However, whenever a response to a comment is needed, it should acknowledge that someone at UF&Shands received the message and a “thank you” to the user for contacting us.

- j. When responding, staff shall remove all PHI contained in the original message. See also [CP3.36 De-identification of Patient Information](#) for additional information.
- k. An example of a simple response (to a comment OTHER than a complaint) that requires no further action on our part could be:

Thank you for your comment. We appreciate your feedback and encourage you to visit UFandShands.org to learn more about the UF&Shands, the University of Florida Academic Health Center.

- l. If the comment requires a more in-depth answer, AND is not a complaint per [CP1.16 Patient and Family Complaints and Grievances](#), our response should promise an answer within a set amount of time (preferably 48-72 hours, or two to three business days). Due to the nature of this type of marketing, the response shouldn't have a “corporate” tone. An example of this response, which should be posted to the site for the world to see, would be:

Thank you for contacting UF&Shands. Due to the nature of this issue, we will need some time to respond. Please be patient. We will respond to you within three business days.

- m. When addressing issues that require a more in-depth response from us, site administrators must judge whether the response should be sent directly to the individual who posted the original comment (that is, take the issue offline and handle privately), or if it should be posted back to the site for the world to see. It's recommended that if we're addressing a comment that shares similarities to other comments, that we post our follow-up response for the world to see so that all parties who expressed a similar comment can benefit from our response. Again, this strategy comports with the very nature of social media. In general, we should minimize the amount of "private" responses.
- n. If the message requires an in-depth response, AND is not a complaint, and the content is outside the scope of the site administrator or department hosting the site, then the site administrator must work with the appropriate department liaison(s) to craft a response. If a site administrator is unsure of who to contact to address a comment, he or she may contact a UF&Shands Communications member for assistance.
- o. If a comment involves a **complaint/grievance***, the standard response should not be handled privately and should say something like:

Thank you for contacting UF&Shands. We appreciate your feedback and your concerns are important to us. In order for us to follow-up with you appropriately, please contact a patient representative at (352) 265-0123 with your compliments, complaints or concerns.

- p. The definition of a patient complaint/grievance, as per Shands Core Policy CP1.16 is as follows:

Patient Grievance - a formal or informal, written or verbal complaint that is made to the hospital by a patient, or the patient's representative, regarding the patient's care, abuse or neglect, issues related to the hospital's compliance with the CMS Hospital Conditions of Participation, or a Medicare beneficiary billing complaint related to rights and limitations provided by regulation or a complaint alleging violation of patient confidentiality.

- q. **IMPORTANT:** Comments that are complaints or grievances must be sent immediately when discovered to the designated facility's complaint-management representative, who will then determine the applicability of *CP1.16, Patient and Family Complaints and Grievances*. These individuals will work with UF&Shands Communications staff to develop an appropriate response to the comment(s). Typically these responses will be handled privately, but we may decide that our response will shed light on a particular concern or issue and how UF&Shands is managing that issue, and thus the response will be appropriate to share with the world. It is also important to note that UF&Shands staff must adhere to [Core Policy 3.14 Email and Calendar Use](#) when transmitting electronic messages to patients or other individuals. CP3.14 prohibits the sending of emails which contain PHI to external email addresses (i.e. those ending in yahoo.com, hotmail.com, etc.) unless that email transmission is encrypted.
- r. **IMPORTANT:** All comments that are deleted should be saved in a Word document and submitted to UF&Shands Communications social media managers for records keeping, in compliance with the Florida public records law. A screen shot of the comment is an acceptable means for documenting a removed message.

V. "Facebook terms and conditions" to be posted on each Facebook Page: The Facebook terms and conditions document in Appendix A to these guidelines must be customized appropriately (see [brackets] for customizable areas) and posted on a tab on each UF&Shands-approved Facebook account.

VI. Additional information about blogs: Blogs started by employees and hosted on other domains are considered personal blogs. These blogs must not be advertised or run as official UF or UF&Shands blogs. If such a blog contains discussion of health-related issues or work matters, the employee should post a disclaimer stating that the blog is not an official UF or UF&Shands blog, and that the opinions expressed there are his or her own personal opinions and not those of UF or UF&Shands.

Employees who discuss work matters on personal blogs should be well versed in appropriate social media behavior and should not violate privacy or other laws that relate to their work environments.

VII. Training: Social media monitors and unit social media managers will be required to attend initial training on social media management, strategies, policies and guidelines. Subsequent training sessions may be offered as new information becomes available and may be mandatory or optional. Social media monitors and unit social media managers should proactively pursue updates, which may come from the web services team, UF&Shands Communications social media team or University Relations.

REFERENCES:

Social media Guidelines Appendix A: Facebook terms and conditions document

Terms and Conditions of the [Name of Department] Facebook Site, including Policy on Posting Comments

This Facebook page was created and is managed by [department name]. The purpose of this page is to communicate with UF faculty, employees of UF and Shands, students, patients, their families, members of the media and the general public about the research, clinical and academic work that takes place at the Health Science Center and UF and Shands.

Materials and/or comments posted on this page should be in keeping with the purpose of the page, as stated above. Materials/comments should not reveal another person's protected health information, student records information, or any other information protected by existing privacy laws. Any such materials/comments will be removed.

The contents of the Wall, Discussion Board, and other areas available for posts on the [department name] Facebook page are the result of text submitted by individual Facebook members and UF alumni, students, faculty, staff and Shands employees and do not reflect in any way the opinions or policies of UF or any of its colleges or departments or Shands. Further, UF and Shands disclaim any liability whatsoever for any postings or other material which are or may become a part of this Facebook page and does not warrant or guarantee that the postings or other materials will not be offensive to a user of the page.

UF and Shands do not prescreen comments. At the same time, UF and Shands reserves the right to block the content of any post that violates any UF or Shands policy, rule or regulation or applicable law. UF and / or Shands shall also have the right to remove content from this Facebook page at any time, without prior notice, whenever it is deemed to be in UF's or Shand's best interest to do so.

Please be aware that all content and posts are bound by the following:

- [Facebook's Terms of Use](#) and [Code of Conduct](#)
- [UF's policies, rules and regulations](#), including without limitation [UF's acceptable Use of Computing Resources Policy](#), and other applicable law, including without limitation copyright law.

Florida has a very broad public records law. As a result, comments received are public records subject to disclosure to the public upon request unless otherwise exempt. Any materials/comments posted here will be retained for a period of time, even if they are deleted from the page.

Reporting Violations of Facebook's Code of Conduct on UF Health Science Center Office of News and Communications Wall or Discussion Board.

Report abusive content to Facebook. According to Facebook procedures:

"Facebook encourages all users to utilize the "Report" links when they find abusive content. You can report an abusive username by selecting the "Report this Person" link located on the bottom left side of that person's profile. This takes you to a form where you can specify the type of abuse and make a detailed report. Facebook investigates

these reports and makes a determination as to whether or not the content should remain on the site. All abuse reports on Facebook are confidential.”

To report violations of a UF or Shands policy, rule or regulation, please refer to the policy, rule or regulation in question for reporting / contact information.

UF and Shands administrator content

If you have a concern about content posted by the administrators of this [department name] Facebook page, please e-mail us at [contact email].