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Policy Owner: Department of Compliance and Risk Management

Contact: 615.327.6102

Applicability: All Meharry Medical College Faculty, Staff and Students
Approved by: The Office of the President

Subject: Meharry Medical College Social Media Policy

Applicability:

This policy applies to Meharry Medical College (hereinafter “MMC” or “College”), its participating physicians, clinicians, students, and all College employees, business associates, contractors, and sub-contractors.

PURPOSE:

Meharry Medical College recognizes the value social media plays in networking and in education; however, improper use can potentially create legal and ethical dilemmas, especially when the online behavior is deemed unprofessional or unlawful. This policy is intended to inform Meharry Medical College workforce, students and business affiliates of the expected social media etiquette and consequences of breaches to protect their personal and professional integrity and MMC’s institutional image and reputation.

DEFINITIONS:

Social Media Platforms: Technology tools and online spaces that enable users to build, integrate or facilitate community interactions. Examples include but are not limited to Facebook, Twitter, LinkedIn, SnapChat, Instagram, YouTube and Web2, which make available personal views and information to the general public.

Social media: Media for social interaction, using highly accessible and scalable communication techniques. Social media uses web-based and mobile technologies to convert communication into interactive dialogue.

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Social networking: The use of dedicated websites and applications to communicate with others, or to find people with similar interest to one's own.

PHI: Protected Health Information is any identifiable health information that is used, maintained, stored, or transmitted by a **HIPAA**-covered entity.

PROCEDURE:

1.1 Social Media Guidelines

1.1.1 Personal Responsibilities

Faculty, staff, students and business affiliates are personally responsible for anything they publish online. MMC does not review, edit, censor, or endorse individual posts. All MMC contingents must consider how their posts reflect on them as an individual, and also about how they reflect MMC thus ensuring the College is not shown in a negative light.

1.1.2 MMC supports the use of social medial for online communications but urges faculty, staff, students and business affiliates to do so appropriately, exercising sound judgment and common sense. If there is any doubt about the suitability, the content should not be posted. All social media users shall post sensibly and responsible in accordance with MMC's policy and guidelines. Anything posted that can potentially tarnish MMC's image will ultimately be the responsibility of the individual.

1.1.3 When participating in online discussion forums/blogs/Facebook etc., related directly or indirectly to MMC, in the delivery of a subject, a disclaimer should be used to ensure that persons covered by this policy understand that the forum/blog etc. is not monitored on a full-time basis. An example of a disclaimer is:

The views and opinions included in this post belong to their author and do not necessarily mirror the views and opinions of Meharry Medical College. All members affiliated directly or indirectly with Meharry Medical College are obliged not to make any defamatory clauses, infringe, or authorize infringement of any legal right. Therefore, the Meharry Medical College will not take any liability for such statements included in emails, post, blogs, etc. In case of any damages or other liabilities arising, the individual making the statement(s) e is fully responsible for the content.

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1.1.4 MMC prohibits sharing of Protected Health Information (“PHI”) or sensitive electronic information on personal or professional social media sites. The posting of PHI is only permitted on MMC sponsored social media sites with management approval and prior properly executed patient authorization following MMC policies for “Photographing/Videotaping/Audiotaping of Patients” and “Authorization for Use and Disclosure of Protected Health Information.” For questions on authorization on posting PHI, contact MMC Compliance Office (615.327.6780).

2. Transparency

All persons covered by this policy must not suggest that they speak on behalf of MMC in blogs or personal webpages if they have not specifically been given that responsibility by the Marketing and Communication department. If referencing MMC, a visible and clear disclaimer shall be posted to make it evident that they are sharing personal views and not those of MMC.

Meharry Medical College must not be used in personal social media account names, nor shall the Meharry Medical College logo be used in social media sites, without prior written approval from the Marketing and Communication department. This potentially creates legal risk for individuals and the College.

3. Privacies and Copyright

3.1 All persons covered by this policy should protect their own privacy by not divulging personal facts or information that may compromise personal and professional privacy.

3.2 Faculty and Students should not discuss their clinical/placement/internship activities online if it has the potential to directly or indirectly identify or harm their patients and/or clients.

3.3 Confidential information about a student or other staff or faculty member should not be disclosed.

3.4 The intellectual property of others should be respected.

3.5 Students should exercise caution when they create online study groups. The materials contained within must have proper attribution and follow applicable copyright laws. Documents of exams or quizzes not approved by the respective faculty members for sharing may result in sanctions up to and including dismissal from the College.

4. Professionalism

4.1 MMC requires that all individuals covered by this policy work together to maintain a professional environment. In particular, be sensitive to cultural issues associated with indigenous and religious groups such as customs related to deceased people. Exercise caution on sensitive topics that could cause offense.

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4.2 Proven instances of policy violation will be deemed as misconduct and disciplinary actions may include up to and including dismissal/termination.

4.3 Faculty, staff and students must refrain from posting to social media any language (text or audio) or images which portray or can be interpreted to portray or promote the following:

Illegal activities, intoxication, harassment, profanity, obscenity, pornography, perceived sexual pictures, abuse to people or animals, defamatory or libelous matter, threats, infringement of intellectual property rights, invasion of privacy and hate. Also prohibited is discrimination on the basis of protected classes.

4.3.1 Images of the deceased (e.g. cadaveric specimens, prosecuted specimens) or images of clinical work performed, without prior patient consent, should not be posted on the Internet.

4.3.2 Students should respect their commitment to learning and should not use practical placement time for personal social networking. Such acts of unprofessionalism, if deemed problematic by the College, may result in disciplinary action.

4.3.3 It is important to adhere to the College's values and institutional policies. This Policy does not supersede other existing policies including, but not limited to the Student Code of Professional Conduct and the College's Code of Conduct, and students, faculty and staff should continue to abide by those.

5. Establishing boundaries between professional and personal lives

Online personal and business personas are likely to intersect. The College respects the free speech rights of all, but staff, faculty and students must remember that the community, colleagues, and others may have access to the online content they post. Be aware that Meharry staff may monitor social networking sites on occasion and egregious unprofessional postings could lead to disciplinary actions.

5.1 All persons covered under this policy should be aware that personal networking on social media sites could blur the student-faculty/staff relationship. It is advised that staff and faculty refrain from accepting or soliciting request from/to current students on their social media.

5.2 Students should not accept personal networking requests (i.e. Facebook) from their patients/clients. Similarly, students should not send personal networking requests to their patients/clients. These types of relationships can blur professional patient/client boundaries. Students should communicate electronically with their patients/clients through mechanisms provided by the College that use encryption and password protection to ensure confidentiality.

5.3 The College recognizes that most individuals use some form of social media, and advises that these applications be used with caution when the affiliation with the College is mentioned or can be inferred as postings shall be subject to this Policy.

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5.4 The growing practice of using home computers, smartphones, iPad, tablets, and other portable devices for work-related purposes may increase the risk of confidential information being lost, stolen or inadvertently shared. The College community should ensure that work-related content is password protected when using technology devices for both work and personal purposes.

6. Breach of Policy

- 6.1 Non-compliance with this Policy will constitute misconduct which may result in disciplinary action, including a verbal or written warning, or in serious cases, termination of employment or dismissal from the College.
- 6.2 As an academic health science center, students and faculty are held to a higher standard of professionalism. In addition to disciplinary action from the College, they may face disciplinary action from the professional society (if a member).

EXHIBITS: