

**Applicability:** UW Medicine

**Policy Title:** Social Media Policy

**Policy Number:** COMP.303

**Superseded Policy(ies) or Entity Policy:** N/A

**Date Established:** May 24, 2011

**Date Effective:** November 27, 2023

**Next Review Date:** November 27, 2026

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## **PURPOSE**

This policy describes UW Medicine workforce members' limitations on the use of social media. The corresponding guidance document defines social media, summarizes related policies and other relevant considerations, and outlines best practices.

This policy is intended to be interpreted in conjunction with the standards described in the UW Medicine Policy on Professional Conduct and UW Medicine Compliance Code of Conduct, particularly when a social media account does not explicitly disclaim the connection between the account's content with the workforce member's role at UW Medicine. Broadly, the Policy on Professional Conduct reminds us that "all members of the UW Medicine community are expected to conduct themselves in a professional and ethical manner with colleagues, patients, and the public" and that "UW Medicine does not condone or tolerate unprofessional behavior, and individuals who engage in such behavior may be subject to disciplinary action up to and including termination."

This policy applies to all social media regardless of whether the platform is specifically named in policy and to all UW Medicine workforce members, which includes faculty, staff, researchers, trainees, students, volunteers and others who perform work for UW Medicine.

## **DEFINITIONS**

See UW Medicine Compliance Glossary.

## **POLICY**

The use of social media is prohibited while performing direct patient care activities, when use would compromise patient confidentiality, and in unit 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 to rest or meal breaks unless social media use has been previously approved by a supervisor for business purposes. Personal social media activities, whether physically in the workplace or elsewhere, may be attributed to the workforce member's official role at UW Medicine. Workforce members should consult with UW Medicine's Social Media Guidance to identify best practices for personal use of social media to ensure the content reflects the workforce member's personal views and not those of UW Medicine.

Workforce members are prohibited from posting content to social media that could identify a UW Medicine patient unless the activity is related to an approved UW Medicine business function and the patient or their legally authorized representative has provided appropriate written consent, such as a signed HIPAA authorization form. This includes any posting that contains protected health information (PHI) or anything that, if taken collectively with others posts or other publicly known information, could identify a UW Medicine patient.

### **REGULATORY/LEGISLATION/REFERENCES**

- Standards for Privacy of Individually Identifiable Health Information, 45 C.F.R. § 160
- General Provisions, 45 C.F.R. § 164, Subpart A
- Security Standards for the Protection of Electronic Protected Health Information, 45 C.F.R. § 164, Subpart C
- Privacy of Individually Identifiable Health Information, 45 C.F.R. § 164, Subpart E
- Washington State Ethics in Public Service Act, Revised Code of Washington 42.52

### **PROCEDURE ADDENDUM(S) REFERENCES/LINKS**

- **Guidance Document**
  - 303.G1 Social Media Guidance
- **Workforce member responsibilities related to professionalism and confidentiality:**
  - UW Medicine Policy on Professional Conduct: <https://www.uwmedicine.org/about/policy-professional-conduct>
  - UW Medicine Code of Conduct: [https://depts.washington.edu/comply/docs/UWM\\_CodeofConduct.pdf](https://depts.washington.edu/comply/docs/UWM_CodeofConduct.pdf)
  - UW Medicine Patient Information Privacy Policies: <https://depts.washington.edu/comply/privacy-policies/>
  - UW Privacy Policies: <https://privacy.uw.edu/policies/>
  - Family Educational Rights and Privacy Act (FERPA) for Students: <https://registrar.washington.edu/students/ferpa/>
  - UW Online Privacy Statement: <http://www.washington.edu/online/privacy/>
  - Access and Use Agreement for UW Data and Information Systems: <https://uwnetid.washington.edu/agree/>
  - UW Data Governance Policies, Standards, and Guidelines: <https://datagov.uw.edu/topics-initiatives/policies/>
  - UW Electronic Discovery: <https://www.washington.edu/ago/electronic-discovery/>
- **UW Medicine Compliance Policies**
  - COMP.103 Use and Disclosure of Protected Health Information (PHI)
    - 103.F12 UH1874 Patient Authorization for UW Medicine to Use or Disclose PHI for Publicity. (VMC, see here)
  - COMP.005 Compliance Investigations
  - COMP.006 Corrective Actions
- **Institutional Time and Property**
  - APS 47.2 Personal Use of University Facilities, Computers, and Equipment by University Employees
  - APS 47.10 Policy on Financial Irregularities and Other Related Illegal Acts
  - UW Appropriate Use Policy for Technology: <https://itconnect.uw.edu/work/appropriate-use/>

- **Intellectual Property**
  - [http://depts.washington.edu/uwcopy/UW\\_Policies/UW\\_Contacts/](http://depts.washington.edu/uwcopy/UW_Policies/UW_Contacts/)
  - [http://depts.washington.edu/uwcopy/Copyright\\_Connection/](http://depts.washington.edu/uwcopy/Copyright_Connection/)
  - UW Patent, Invention and Copyright Policy:  
<http://www.washington.edu/admin/rules/policies/PO/EO36.html>
  - UW DMCA (Digital Millennium Copyright Act) Information:  
<http://www.washington.edu/itconnect/work/appropriate-use/uw-dmca-digital-millennium-copyright-act-information/>
  - UW Trademarks and Licensing Policy: [Revised-Policies-May-2019-APPROVED-MG.pdf](#) ([amazonaws.com](http://amazonaws.com))
- **Crowdfunding**
  - UW Medicine Policy on Crowdfunding:  
<https://www.uwmedicine.org/about/aboutpoliciescrowdfundingpolicy.pdf>
- **Additional resources**
  - The American Medical Association Opinion 2.3.2 Professionalism in the Use of Social Media (<https://www.ama-assn.org/delivering-care/ethics/professionalism-use-social-media>)
  - State of Washington Medical Quality Assurance Commission, Professionalism and Electronic Media  
(<https://wmc.wa.gov/sites/default/files/public/documents/Professionalism%20and%20Electronic%20Media%20Guideline%20GUI2014-02.pdf>)

## **ROLES AND RESPONSIBILITIES**

See [303.G1 Social Media Guidance](#)

## **APPROVALS**

/s/ Beth DeLair

Beth DeLair  
Chief Compliance Officer, UW Medicine  
Associate VP for Medical Affairs, UW

11/27/2023

Date