

Applicability: UW Medicine

Policy Title: Social Networking Policy

Policy Number: COMP.303

Superseded Policy(ies) or Entity Policy: N/A

Date Established: May 24, 2011

Date Effective: January 14, 2020

Next Review Date: January 14, 2023

PURPOSE

This policy and its related guidance documents describe UW Medicine’s requirements for workforce members (including faculty, staff, researchers, trainees, students, volunteers and others who perform work for UW Medicine) to limit the use of social media, in addition to defining what is meant by social media, summarizing relevant related policies and considerations, and outlining best practice guidelines.

This policy applies to all social media, regardless of whether specifically named in policy.

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.

Workforce members are prohibited from posting anything to social media that could identify a UW Medicine patient unless specific to a work function and the patient or their legally authorized representative has provided appropriate written consent. This includes any posting that contains protected health information (PHI) or anything that if taken with collectively with others posts or other publically 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 Documents**
 - 303.G1 Social Networking Guidance
- **Workforce member responsibilities related to professionalism and confidentiality:**
 - UW Medicine Policy on Professional Conduct: <https://www.uwmedicine.org/about/policy-professional-conduct>
 - Entity Codes of Conduct: <http://depts.washington.edu/comply/resources/>
 - UW Medicine Patient Information Privacy and Security Policies: http://depts.washington.edu/comply/patient_privacy/
 - UW Privacy and Information Security 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/>
 - UW Access and Use Agreement: <https://uwnetid.washington.edu/agree/>
 - UW Data Management Committee (DMC) Policies: <https://www.washington.edu/uwit/divisions/im/dmc/dmc-policies/>
 - UW Guidelines for Electronic Discovery: <http://www.washington.edu/admin/ago/ediscovery.pdf>
- **Patient Information Privacy And Security**
 - UW Medicine Compliance Privacy and Security Policies
 - [COMP.103 Use and Disclosure of Protected Health Information](#)
 - [COMP.005 Compliance Investigations](#)
 - [COMP.006 Corrective Actions](#)
 - [103.F12 UH1874 Patient Authorization for UW Medicine to Use or Disclose PHI for Publicity. \(VMC, see here\)](#)
- **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](#)
 - Using Your Computer in Residence Halls: <https://itconnect.uw.edu/work/appropriate-use/>
- **Intellectual Property**
 - http://depts.washington.edu/uwcopy/UW_Policies/UW_Contacts/
 - http://depts.washington.edu/uwcopy/Copyright_Connection/

- UW Patent, Invention and Copyright Policy:
<http://www.washington.edu/admin/rules/policies/PO/EO36.html>
- UW Digital Millennium Copyright Act:
<http://www.washington.edu/itconnect/work/appropriate-use/uw-dmca-digital-millennium-copyright-act-information/>
- UW Trademark and Licensing Policies:
<http://depts.washington.edu/uwlogos/uw-resources/policies-procedures>
- **Crowdfunding**
 - UW Medicine Policy on Crowdfunding:
[https://stevie.cms.uwmedicine.org/sites/stevie/files/2018-12/About Policies Crowdfunding Policy.pdf](https://stevie.cms.uwmedicine.org/sites/stevie/files/2018-12/About_Policies_Crowdfunding_Policy.pdf)
- **Additional resources**
 - The American Medical Association Opinion 9.124 (2011) Professionalism in the Use of Social Media (<https://www.ama-assn.org/delivering-care/ethics/professionalism-use-social-media>)
 - Department of Health 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 Networking Guidance

APPROVALS

/s/ Beth DeLair

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

1/14/2020

Date