

## **THE CLEVELAND CLINIC FOUNDATION MEDIA AND SOCIAL NETWORKING POLICY**

**ANY EVENT OR INQUIRY FROM THE NEWS MEDIA ACROSS THE CLEVELAND CLINIC HEALTH SYSTEM THAT AFFECTS OR IS LIKELY TO AFFECT THE OVERALL REPUTATION OF THE CLEVELAND CLINIC MUST BE ROUTED TO THE MAIN CAMPUS PUBLIC AND MEDIA RELATIONS DEPARTMENT.**

### **I. Policies for Media (Guide): General Media Policies**

1. The Cleveland Clinic Health System (CCHS) strives to accommodate media requests quickly and efficiently with little or no disruption of patient care. To expedite requests, journalists are required to follow these guidelines when seeking to contact CCHS patients or personnel:
  - a. All media requests must be coordinated by a Media Relations representative. Each hospital has a designated Media Relations representative available at all times to facilitate requests. (CCHS contact information is included at the end of this policy guide.) Per CCHS policy, media calls placed to other employees within the organization will be channeled to the Media Relations office.
  - b. All journalists must be cleared by Media Relations to work on CCHS property and must be escorted by a Media Relations staff member while inside CCHS buildings. Only a Media Relations representative may obtain this clearance. Security personnel will detain news personnel who enter CCHS facilities without Media Relations clearance until the journalist's credentials can be verified and proper clearance obtained.
  - c. To ensure confidentiality and privacy, patients may not be interviewed, photographed or filmed on CCHS property without their having provided written consent to a member of the Media Relations staff. Signed media consent forms will be kept on file in the Media Relations office. If the patient is a minor, permission must be obtained from a parent or verifiable legal guardian.
  - d. Patient well-being takes precedence in every situation. Hospitals may deny the media access to any patient if a physician determines that the media's presence would aggravate the patient's condition or interfere with appropriate clinical care.

### **II. Rules for Releasing Patient Information to the Media / HIPAA Compliance**

1. The federal Health Insurance Portability and Accountability Act of 1996 (HIPAA) mandates regulations that govern privacy, security and administrative simplification standards for healthcare information. HIPAA sets forth *minimum* standards that hospitals must follow with regard to the release of patient information. Any CCHS policy that is more restrictive than mandated by HIPAA takes precedence over the federal regulations.
2. HIPAA restricts the information that healthcare providers are permitted to include in a patient directory for release to the public, including the news media. These guidelines apply to public officials and public personalities just as they do to private citizens. Directory information is limited to four elements, and patients have the right to further restrict the release of their directory information. The directory elements are:
  - a. Name. This information will be released only to those, including the media, who ask about a patient by name and only if the patient has not restricted its release.
  - b. Condition. The condition provided and its medical description is in accordance with American Hospital Association guidelines. The terms – undetermined, good, fair, serious and critical – are defined within this policy manual.
  - c. Location within the hospital. This information will be provided only if it does not reveal legally protected patient information regarding the nature of treatment being provided.

- d. Religion. This information is available only to verifiable, credentialed clergy members.

### 3. NOTES:

- a. While HIPAA privacy regulations restrict the information that healthcare providers may release, patients are free to release their own personal information or to consent to media interviews provided that their actions do not interfere with their medical treatment. Furthermore, Cleveland Clinic may choose not to release such requested information if cc believes that it is in the best interest of the patient.
- b. If patients are unable to “opt out” of the facility directory listing because of incapacity or emergency treatment, the Cleveland Clinic Health System will not release information until the patient or legal guardian is able to provide consent.
- c. The fact that a hospital has an obligation to report certain confidential information to a governmental agency does not make that information public and available to news reporters. In these situations, reporters must contact the appropriate local, state or federal agency. The public entity will be guided by applicable statute as to whether it can release any or all of the information it receives.

## III. Employee Social Media Guidelines (“Guidelines”)

Cleveland Clinic has opened publicly facing internet web pages on social media sites for viewing content and/or videos and posting comments about the Cleveland Clinic. Furthermore, you have public, general access to other social media sites and internet sites. These social media and general internet sites include but are not limited to various blogs, bulletin boards, networks, multi-media and news media sites, other user generated content sites or personal or Cleveland Clinic pages on any of these sites (“Social Media Sites”). If you are a Cleveland Clinic employee and wish to post comments on any one of these Social Media Sites, you must adhere to these Guidelines. Please remember, that as an employee of the Cleveland Clinic, your words, postings and your actions may be erroneously viewed by the public as representative of the Cleveland Clinic and therefore you must ensure that you are respectful and civil in your postings on these sites and responsible in your decisions when posting content to such sites to ensure that you do not damage Cleveland Clinic’s goodwill. Also, when posting any content on an internet site, you should think carefully about disclosing detailed or private information about yourself, others and your family. Violations of these Guidelines may result in discipline that may include termination.

### 1. All Employees:

- a. You may not publish any content that is related to any Cleveland Clinic patient and must strictly maintain at all times all information related to any patient and that patient’s privacy consistent with Cleveland Clinic policy and applicable law.
- b. All employees are expected to know and adhere to the Cleveland Clinic employment policies located at:

[http://intranet.cchs.net/policies/hipaa/Security/1\\_Policies/End\\_User\\_Safeguards/813\\_CCHS\\_PC\\_and\\_End\\_UserDevice\\_Acceptable\\_Use\\_Policy.htm](http://intranet.cchs.net/policies/hipaa/Security/1_Policies/End_User_Safeguards/813_CCHS_PC_and_End_UserDevice_Acceptable_Use_Policy.htm)

<http://intranet.ccf.org/hr/PoliciesProcedures/005%20Non%20Discrimination,%20Harassment%20or%20Retaliation%20rev3.pdf>

<http://intranet.ccf.org/hr/PoliciesProcedures/518%20Solicitation%20and%20Distribution%20of%20Lit%20rev%204.pdf>

<http://intranet.ccf.org/hr/new/policies/P510.pdf>

[http://intranet.cchs.net/policies/hipaa/Security/1\\_Policies/End\\_User\\_Safeguards/811\\_CCHS\\_Internet\\_Appropriate\\_Use\\_Policy.htm](http://intranet.cchs.net/policies/hipaa/Security/1_Policies/End_User_Safeguards/811_CCHS_Internet_Appropriate_Use_Policy.htm)

- c. You must adhere to the Social Media Policy, which is incorporated by reference into these Guidelines located at: [http://my.clevelandclinic.org/social\\_media\\_policy.aspx](http://my.clevelandclinic.org/social_media_policy.aspx)
- d. You must contact the Law Department before selling any items or soliciting donations through the Social Media Site, or before you attempt to allow advertisements or sponsorships on the Social Media Site.
- e. Employees are personally responsible for the content that an employee chooses to post on any Social Media Site.
- f. It is imperative that you make it clear in your postings that you are speaking for yourself as an individual and not for the Cleveland Clinic. Please add the following to your postings: "This post is personal to me and does not necessarily reflect the opinions or positions of the Cleveland Clinic." If you post any comments related to Cleveland Clinic on one of these Social Media Sites, you must disclose your position and role with Cleveland Clinic and ensure that you adhere to a respectful tone and content postings that do not expose you or Cleveland Clinic to any liability or in an unfavorable light. You may not refer to Cleveland Clinic on these Social Media Sites in a disparaging manner.
- g. You may not publish any content that is related to any confidential or proprietary information of Cleveland Clinic on any Social Media Site. Permission must be granted by the Media & Public Relations Office at 216-444-0141 to post any content containing confidential or proprietary Cleveland Clinic information.
- h. As an employee, such postings of content on any Social Media Site must adhere to internet use policies and the time spent posting or viewing any Social Media Sites may not interfere with or affect your employment activity within the scope of your employment. Your postings on any internet site are personal to you and therefore you may not use your Cleveland Clinic email address in your posting.
- i. You may not provide any content to a Social Media Site that contains any product or service endorsements or any content that may construed as political lobbying, solicitations or contributions.
- j. If you have any questions about these Guidelines or the Policy, please contact [socialmedia@ccf.org](mailto:socialmedia@ccf.org) or call the Media & Public Relations Office at 216-444-0141.

## **2. Designated Employee Social Networkers:**

- a. If you have a legitimate work related reason for using a Social Media Site within the scope of your employment with Cleveland Clinic, and you have been directed to engage in any activity on a Social Media Site by a Cleveland Clinic supervisor in Cleveland Clinic's name, you must first get approval as outlined below prior to posting any content on such Social Media Sites:
  - i. Submit a request to the Public and Media Relations Department and Public and Media Relations will bring this request to the social media committee to make its determination. . One-time communication requests should be handled in accordance with our media policy.
  - ii. Once a request is received, you will be asked to complete a **social media request form** that is used to evaluate the proposed channel to ensure it meets guidelines set by the Public and Media Relations Department and the social media committee.
  - iii. The **social media committee** will review your proposal and will discuss the recommendations with you, which will outline next steps for satisfying your request.
  - iv. Finalized requests will be approved after a **social media channel manager** form has been completed and signed by the primary communicator, members of the social media committee and a supervising division or institute representative.

### **3. Social Media Code of Ethics**

- a. Cleveland Clinic engages in conversations on the Internet and applies the following code of ethics when interacting with any member of the public or employees.
  - i. Information posted on Cleveland Clinic web and social media sites, as well as information posted by Cleveland Clinic representatives on other social media sites will be accurate and factual. Cleveland Clinic employees will identify that they work for Cleveland Clinic and will disclose conflicts of interest.
  - ii. Cleveland Clinic will acknowledge and correct mistakes and welcomes feedback. When applicable, edits will be completed in a manner that allows tracking of changes.
  - iii. Cleveland Clinic will give credit to content authors and will provide direct online links when available.
  - iv. Cleveland Clinic reserves the right to remove content that is inaccurate, offensive or characterized as spam.
  - v. When responding to certain individual posts, Cleveland Clinic will provide a name of a Cleveland Clinic representative, a phone number or email address for direct communication.