

Project Vida Health Center  
Graduate Medical Education  
Policies and Procedures

**Social Media Use Policy**

APPROVED: 11/1/2023

EFFECTIVE DATE: 11/1/2023

REVISED:

**Policy:** This policy offers guidance to Project Vida Health Center residents choosing to use social media as a form of communication and collaboration.

**Scope:** This policy applies to all residency training programs and its members of Project Vida Health Center.

**Procedures:** All GME residents will follow all policies and procedures outlined by Project Vida Health Center regarding social media. See Appendix A.



## Appendix A

## Policies and Procedures

<b>DEP/OPS AREA:</b> Social Media		<b>POLICY NAME:</b> Social Media Use Policy	
<b>EFFECTIVE (ORIGINAL) DATE:</b> 05/22/2019		<b>REVISED DATE:</b> 4/26/2022	
<b>SCOPE:</b> All PVHC, PV and PVCDC Staff		Policy Number: 1057	
<b>APPROVAL DATE:</b> 05/17/2022	<b>DATE REVIEWED:</b> 05/17/2022	<b>APPROVED BY:</b> Board of Directors	

**POLICY** – It is the policy of Project Vida, Project Vida Health Center and Project Vida Community Development Corporation (PV, PVHC, PVCDC) to assure all employees and volunteers conduct themselves professionally and responsibly on all official Project Vida social media platforms, as well as on personal social media platforms regarding Project Vida.

**OUTCOME STANDARDS** – To assure that any comments posted on any social media platform as a Project Vida employee is a direct reflection of your personal opinions and not used as a representation of our organization.

**DEFINITION** - Social Media is defined as, “websites and other online means of communication that are used by large groups of people to share information and to develop social and professional contacts”.

This policy does not distinguish between “personal” and “work” usage, or personal devices and organization-provided equipment. You are at all times an associate of Project Vida regardless of how or when you are posting on social media. This policy is meant to reflect how employees conduct themselves on personal social media platforms as well as Project Vida official social media platforms.

Project Vida recognizes the role social media plays in modern communication. As such, we respect the right of employees to use social services networks for self-publishing and self-expression while adhering to our organizational guidelines, keeping in mind that any commentary that is considered defamatory, obscene, proprietary or libelous by any offended party could subject you to personal liability and damage our reputation.

## PROCEDURE

All Project Vida employees and volunteers are held to these guidelines:



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1. Following social media accounts run by Project Vida is encouraged and appreciated.
2. Presenting yourself as a Project Vida employee is allowed. Any questions about how and to what capacity you may publically associate yourself with Project Vida should be directed to the CEO/Co-Director. In general, it is acceptable to say where you work, along with information that could be found in your job description. It is encouraged to air on the side of caution when posting to social media.
3. If associated as a Project Vida employee on social media, you should conduct yourself responsibly and professionally.
4. You are not to conduct yourself on social media in a manner that suggests being in an official position or platform to represent the entirety of PV/PVHC/PVCDC
5. You should not answer questions or respond to comments directed at Project Vida on social media. The CEO/Co-Director is the only designated speaker for Project Vida and its sister organizations.
6. Employees are encouraged to share content from Project Vida official platforms from their personal devices, however, it will be under the discretion of the supervisor if that can be done during work hours. Any personal social media usage that distracts from work responsibilities will not be tolerated.
7. Problems occurring at work should be worked out in-house. Airing your personal grievances on social media rarely leads to positive outcomes. We value openness with supervisors and continually work towards maintaining effective and organized communications so that they can act as a first response to issues. However, if you fear that speaking through the established channels will result in personal consequences, we encourage you to follow your chain of command, such as your program supervisor or even the CEO/Co Director, when necessary.
8. All employees, whether publicly associated with Project Vida or not, are allowed to and encouraged to have their own personal values, opinions, and means of expression; however, harassing, threatening, or discriminating against any individuals through social media will not be tolerated.
9. Sharing any organization-privileged information, including organization-issued documents, through social media will not be tolerated. Any questions about what is considered privileged should be directed to your supervisor.
10. Posting photographs or videos of other employees without their permission on personal social media is prohibited.
11. Posting photographs or videos of patients or clients on personal social media pages is prohibited.
12. When working with minors:
  - a. Accepting any friend request from minors is strictly prohibited.
  - b. Accepting any kind of media from minors/patients is strictly prohibited.
  - c. Contacting a minor from your personal social media accounts is strictly prohibited.



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- d. Sharing photographs and videos is strictly prohibited unless parents or guardians have given full permission.
13. Posting gossip about patients or clients is prohibited.
14. Staff should maintain Project Vida information private or confidential, such as, technical systems used, processes and program development.
15. Posting internal reports, policies, procedures or other internal business-related confidential communications is prohibited.
16. Respect financial disclosure laws. It is illegal to communicate or give a "tip" on inside information to others so that they may profit or sell confidential information relating to Project Vida.
17. Creating a link from your blog, website or other social media networking site to Project Vida social media platforms without expressed permission from CEO/Co-director is prohibited.
18. As a Health based organization, Project Vida is subject to many confidentiality policies, including those of the Health Insurance Portability and Accountability Act of 1996 (HIPAA). This applies to both personal and organizational social media platforms. In accordance with these standards, and in avoidance of violations, the following must be followed:
19. Never disclose any patient or employee's protected health information (PHI) on social media platforms. If any content could potentially violate the privacy of clients, patients, or other employees, it should not be posted. This includes "any text about specific patients as well as images or videos that could result in a patient being identified. PHI can only be included in [organizational] social media posts if a patient or their guardian has given their consent, in writing, to allow their PHI to be used and then only for the purpose specifically mentioned in the consent form."
  - a. Never post images and videos of patients or clients without written consent. Pictures and videos should only be taken for the use of Project Vida's social media.
  - b. Never post any information that could allow a patient or client to be identified in any association with our services, without consent for a specific purpose.
  - c. Never share photographs or images taken inside a healthcare facility in which PHI is visible.
  - d. Never share photos, videos, or text on social media platforms within a private group that contains PHI.
  - e. More information on HIPAA compliance for social media can be found at <https://www.hipaajournal.com/hipaa-compliance-checklist/>



- \* Violations of any of the guidelines listed in this policy will be subject to disciplinary action, up to and/or including suspension or termination. Where necessary, we will advise appropriate officials of any violations of law.
- \* If you become aware of any violations of this policy you should report the violation to your supervisor.
- \* Nothing in this policy is intended to create a contract of employment or for the provision of any benefit, and this policy does not in any way alter the “at will” nature of employment with our organization.
- \* All staff will be encouraged to maintain their social media platforms private.

\_\_\_\_\_  
Board of Directors

\_\_\_\_\_  
Date