

Mount Sinai Health System Social Media Guideline

Social media are internet-based applications which support and promote the exchange of user-developed content. Some current examples include Facebook, Wikipedia, and YouTube. Posting personal images, experiences and information on these kinds of public sites poses a set of unique challenges for all members of the Mount Sinai community, including employees, faculty, house staff, fellows, volunteers, and students (collectively “Personnel”). All personnel have responsibility to the Institution regardless of where or when they post something that may reflect poorly on Mount Sinai. Mount Sinai is committed to supporting your right to interact knowledgeably and socially; however these electronic interactions have a potential impact on patients, colleagues, Mount Sinai, and future employers’ opinions of you. The principal aim of this Guideline is to identify your responsibilities to Mount Sinai in relation to social media and to help you represent yourself and Mount Sinai in a responsible and professional manner.

Guideline

The following Guideline outlines appropriate standards of conduct related to all electronic information (text, image or auditory) that is created or posted externally on social media sites by Personnel affiliated with Mount Sinai. Examples include, but are not limited to: text messages, media messaging service (MMS), Twitter®, Facebook®, Linked-In®, YouTube®, and all other social networks, personal and organizational websites, blogs, wikis, and similar entities. This Guideline applies to future media with similar implications. It also applies whether Personnel are posting to: Mount Sinai-hosted sites; social media in which one’s affiliation is known, identified, or presumed; or a self-hosted site, where the views and opinions expressed are not intended to represent the official views of Mount Sinai.

Reference to Other Policies

All existing policies of the Mount Sinai Health System apply to Personnel in connection with their social media activities. A list of relevant policies is included at the end of this Guideline.

Best Practices

Everyone who participates in social media activities should understand and follow these simple but important Best Practices:

Take Responsibility and Use Good Judgment. You are responsible for the material you post on personal blogs or other social media. Be courteous, respectful, and thoughtful about how other Personnel may perceive or be affected by postings. Incomplete, inaccurate, inappropriate, threatening, harassing or poorly worded postings may be harmful to others. They may damage relationships, undermine Mount Sinai’s brand or reputation, discourage teamwork, and negatively impact the institution’s commitment to patient care, education, research, and community service.

Think Before You Post. Anything you post is highly likely to be permanently connected to you and your reputation through Internet and email archives. Future employers can often have access to this information and may use it to evaluate you. Take great care and be thoughtful before placing your identifiable comments in the public domain.

Protect Patient Privacy. Disclosing information about patients without written permission, including photographs or potentially identifiable information, is strictly prohibited. These rules also apply to deceased patients and to posts in the secure section of your Facebook page that is accessible by approved friends only.

Protect Your Own Privacy. Make sure you understand how the privacy policies and security features work on the sites where you are posting material.

Respect Work Commitments. Ensure that your blogging, social networking, and other external media activities do not interfere with your work commitments.

Identify Yourself. If you communicate in social media about Mount Sinai, disclose your connection with Mount Sinai and your role at the Health System. Use good judgment and strive for accuracy in your communications. False and unsubstantiated claims, and inaccurate or inflammatory postings may create liability for you.

Use a Disclaimer. Where your connection to Mount Sinai is apparent, make it clear that you are speaking for yourself and not on behalf of Mount Sinai. A disclaimer, such as, "The views expressed on this [blog; website] are my own and do not reflect the views of my employer," may be appropriate.

Respect Copyright and Fair Use Laws. For Mount Sinai's protection as well as your own, it is critical that you show proper respect for the laws governing copyright and fair use of copyrighted material owned by others, including Mount Sinai's own copyrights and brands.

Protect Proprietary Information. Do not share confidential or proprietary information that may compromise Mount Sinai's business practices or security. Similarly, do not share information in violation of any laws or regulations.

Seek Expert Guidance. Consult with the Marketing & Communications Department if you have any questions about the appropriateness of materials you plan to publish or if you require clarification on whether specific information has been publicly disclosed before you disclose it publicly. Social media may generate interest from the press. If you are contacted by a member of the media about a Mount Sinai-related blog posting or Health System information of any kind, contact the Press Office, a division of the Marketing & Communications Department, at 212-241-9200 or newsmedia@mssm.edu

Failure to abide by Mount Sinai policies may lead to disciplinary action, up to and including termination or expulsion.

Applicable Policies:

These policies include, but are not limited to: Use or Disclosure of Protected Health Information (PHI) or Confidential Mount Sinai Materials; Computer Use Policy; Use of Mount Sinai's Trademarks and Proprietary Information; Electronic Communications; Confidentiality of the Medical Record; Camera and Video Recorder Use; Portable Electronic Devices; Human Resources Policies 13.5 (Electronic Mail/Email) and 13.6 (Internet Use); and all professionalism policies and codes of conduct. Policies not listed above that are in the Human Resources Manual, the Faculty Handbook, the House Staff Manual, the Student Handbook and the Bylaws of the Hospital Staff also apply.

The following are fictional use-case examples of social media and blogging activities and an explanation of their appropriateness as per the Mount Sinai Health System Social Media Guideline:

1. **A patient attempts to "friend" an attending physician on Facebook.** This is almost always inappropriate, unless the doctor-patient relationship has ended. Even after the doctor-patient relationship has ended, it would be inappropriate to discuss health-related information. (Best Practice 3)
2. **A patient comments on a Mount Sinai physician's blog and discloses protected health information with the expectation that the Mount Sinai physician will continue the discussion.** Any health-related

discussions by email with patients require a written consent. Similarly, social media discussion with a patient should not directly address health concerns of individual patients. (Best Practice 3)

3. **A medical student “tweets” that he just finished rounds with the residents on a patient and describes the clinical findings of that patient.** It is difficult to be certain that information disclosed in the Twitter® post is not identifiable to that particular patient. The best type of posting would include very general information. Other posts by the same student could indicate his/her medical school and current rotation, leading to circumstances that indirectly identify the patient, such as by naming a very rare disease. (Best Practice 3)
4. **A medical student writes in her blog, naming an attending physician who did minimal teaching on rounds and recommending that other students not take clinical electives with that physician.** Legitimate critique of an educational activity is appropriate, so long as professionalism is maintained. There are more effective and less public mechanisms for relaying this type of information, and the student may be counseled accordingly. (Best Practices 1, 2)
5. **A graduate student posts to his “wall” on Facebook that half of the class was sleeping during Dr. X’s lecture on biostatistics.** This is very similar to the use case above. (Best Practices 1, 2)
6. **A pediatric resident posts (on her Facebook wall) a picture of a baby who was just discharged from her service, expressing joy, best wishes to the family, and congratulating everyone involved in this excellent patient outcome.** Without written patient/representative consent, this is a clear violation of patient confidentiality, even if the patient is not named. (Best Practice 3)
7. **A laboratory technician blogs that the laboratory equipment he is using should have been replaced years ago and is unreliable.** The public disclosure of such information increases the liability for the Health System and is clearly unprofessional. There are legitimate and confidential mechanisms for improving quality at the Health System. (Best Practices 1, 2)
8. **A graduate student wearing a Mount Sinai t-shirt is tagged in a photo taken at a local bar and posted on a friend’s Facebook page. The graduate student is clearly inebriated.** The two issues are that: (1) the Mount Sinai logo identifies the affiliation to the institution; and (2) the unprofessional behavior of the student is available for all to see, including future employers and potential patients of Mount Sinai. The graduate student did not post the photo, but should do everything possible to have the photo removed and remove the tagging link to the student’s own Facebook page. (Best Practices 2, 4)
9. **A postdoctoral fellow blogs that her laboratory technician wears too much cologne, has terrible taste in clothes, and takes overly long lunch breaks.** This is an inappropriate forum and set of comments and demonstrates unprofessional behavior by the post-doctoral fellow. There are legitimate and confidential mechanisms for addressing valid concerns in the workplace. (Best Practices 1, 2)
10. **An oncology nurse practitioner uses an alias and blogs that Mount Sinai has the lowest bone marrow transplantation complication rate in the world.** This may be a violation of Federal Trade Commission regulations that prohibit false or unsubstantiated claims, and does not disclose the employee’s material relationship to Mount Sinai. (Best Practice 6)
11. **An applicant to the School of Medicine is given access to an Icahn School of Medicine blog to comment on the experience. The applicant writes that another medical school in NYC is obviously more prestigious and has better housing.** Mount Sinai has no recourse against non-affiliated individuals. The administrator of the blog should have established policies and procedures for editorial procedures. If the blog posting meets these editorial guidelines, then the blog posting should remain. It is likely that others will debate the original comment and place Icahn School of Medicine’s reputation and housing status in context.

12. **A medical student creates a social media website to discuss medical knowledge (e.g., "Cardiology Interest Group" on Facebook®)** This is a learning community environment, in which medical knowledge is exchanged, shared and discussed. While the goal is laudable, there are still risks. A disclaimer is necessary, since postings may be incorrect, taken out of context, or improperly referenced. The moderator should take precautions to prevent the posting of information potentially identifiable to a particular patient. (Best Practices 1, 3 ,6, 7)

Medical School Addendum to the Social Media Policy

As stated in the Institutional policy, posting personal images, experiences and information on public websites poses a set of unique challenges for all members of the Mount Sinai community. We have developed additional guidelines below to assist the navigation online relationships, sharing of information and the challenges that come with an online presence.

1. **Student, Faculty and Staff Interaction.** Students, Faculty and Staff should be respectful when requesting or contacting each other on social media. It is important to consider that the person being contacted may have professional/personal boundaries and may not consider relationships on social media to be appropriate.
2. **Posting on social media.** When posting on social media or viewing/sharing/liking on these platforms, keep in mind that anyone may be able to view these materials (including those you are friends with and potential future employers). Refer to the Institutional Policy above for more information.
3. **Interaction on social media.** By connecting on social media, you acknowledge that you are engaging with each other outside the professional boundaries of the educational environment. It is important to consider that individuals have differing viewpoints, and you should engage in respectful and professional conversations.
4. **Contacting patients or their family members.** Students, Faculty and Staff should never contact patients or their family members on social media. For more case scenarios about patient interaction on social media and HIPAA guidelines, please see the Institutional Policy above.