

UCF/HCA Florida Healthcare GME Media, Social Media and Internet Use Policy

Purpose/Intent: This policy provides guidance regarding the appropriate use of the internet and social media/networking websites as well as popular media (op-ed pieces) for communication.

Summary: Inappropriate internet, op-ed and social networking communication is unprofessional and may be a source of liability and embarrassment for individuals and institutions. Physician learners includes both residents and fellows.

Purpose: UCF/HCA Florida Healthcare GME supports the proper use of social and op-ed media and also recognizes the need to manage the use of media to protect the reputation of UCF COM, all participating hospitals and clinical sites, as well as to ensure the privacy of their staff, faculty and patients. This policy establishes the standards to ensure the use of popular/social media by all physician learners is appropriate and consistent, and personal use of such media does not interfere with work responsibilities.

Definition of Social Media:

Social Media includes but is not limited to blogs, op-ed pieces in newspapers and other public forums, online discussion boards, online communities, social networks (defined as application enabling user social communication), microblogs, photo and video sharing sites. Examples include, but are not limited to Facebook, LinkedIn, Instagram, Twitter, Flickr, Snapchat, YouTube and online comment sections.

General Information:

Physician learners need to be cognizant that when posting content online and in op-ed pieces, they may be viewed as representing the university, HCA and participating hospitals, the clinical sites and the medical community. If you identify yourself as employed or affiliated with UCF, HCA, or an affiliate, you must make it clear your views are personal and that you are not a spokesperson of or for these organizations. Physician learners should be aware that:

- All material published on the internet or in news sites should be considered public and permanent.
- Any information posted on a social networking site may be disseminated (whether intended or not) to a larger audience, and a post may be taken out of context or remain available online in perpetuity.
- There is no expectation of privacy when using institutional computers and electronic devices.
- Physician learners should carefully take into consideration and adopt privacy best practices for social media to include, but not limited to, enhancing the privacy settings on all social media sites.
- Limit Internet use for social networking to your personal time only. If using a device owned by

HCA and/or UCF), you must abide by HCA and/or UCF device policies as applicable. All physician learners are subject to the University Use of Information Technology and Resource Policy 4-002.1.

Professionalism

The tone and content of all electronic conversations should remain professional and respectful. To use social media and social networking sites professionally physician learner shall:

- Refrain from posting unprofessional images or behavior that may tarnish their professional image and impair their ability to practice medicine effectively, become licensed, and/or participate in positions of trust and responsibility within an institution or within the community.
- Never post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or any other entity.
- Never use social media to discriminate or harass any individual based on race, color, gender, religion, national origin, disability, age, veteran status, genetic information or any other characteristic protected by state or federal law.
- Never use social media to impersonate another user or mislead a recipient about one's identity.

Protecting Privacy/Confidentiality

Just as in the hospital or ambulatory setting, patient privacy and confidentiality must be protected at all times, including on social media and social networking websites.

- Privacy and confidentiality between physician and patient are of the utmost importance. All health care providers have an obligation to maintain the privacy of health information as outlined by the Health Insurance Portability and Accountability Act (HIPAA).
- Identifiable protected health information (PHI) should never be published/posted on the internet. This applies even if no one other than the patient is able to identify him/herself from the posted information.
- Patient images must never be posted online. Patient images should be only obtained with written consent, and then only using institutional hardware, and never using physician learner's personal equipment. Patient images must be stored and/or transmitted only using institutional hardware, and never on personal equipment or posted online.
- Personal phones, personal cameras and other personal devices shall not be used to photograph, film or record patients or to receive, store or transmit individually identifiable information about patients.
- Physician learner should never mention patients' room numbers, refer to them by code names, post pictures of them, or post any identifiable information of patients. Each individual is responsible for the content of his/her own posts and blogs, including any legal liability incurred (HIPAA or other).
- Transitions of care/sign-out of patients must not be done by routine email or unapproved data file sharing sites.

Respecting Copyright laws, Proprietary Rights, Advertisements and Endorsements

Physician learner must avoid discussing any sensitive, proprietary, confidential, or financial information about any institution. Any material posted by a physician learner that identifies or could identify an institution in which the physician learner has worked or is working should have prior written authorization by the appropriate official of that institution.

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- Branding: your social media name, handle, or URL should not include UCF, HCA or affiliated hospital. Unauthorized use of institutional information or logos is prohibited, including but not limited to UCF, HCA hospitals, and affiliates.
- No institutional phone numbers, e-mail addresses, or web addresses may be posted to a website without written permission from an authorized institutional official.
- Endorsements: never imply you are endorsing a person or product on behalf of UCF, HCA or affiliate in social media, op-ed, or networking site.
- Do not post any advertisements of HCA or affiliate products and services unless you receive official authorization.

Interacting with Patients

To maintain appropriate professional boundaries and compliance with HIPAA:

- Physician learner should not “friend”, “connect with”, or “follow” patients on any social networking site or review patient profiles on these sites.
- It is never appropriate to provide specific medical advice to a patient on a social networking site.

Posting with Caution

Postings within social networking and op-ed sites are subject to the same professionalism standards as any other personal interaction. Remember online activities, even those that seem private, can become public if content is copied, forwarded or printed. Text, images and video can remain on the internet even after efforts have been made to remove them. Physician learner should routinely monitor their own “internet presence” to ensure their personal and professional information posted by themselves or others is accurate and professional. This includes making an effort to not be “tagged” in images posted by others that might be seen as portraying the physician learner in an unprofessional manner. Physician learner should ensure they have implemented appropriate privacy settings to avoid inadvertent dissemination of personal information to others outside of their control.

Physician learner are strongly encouraged to take a moment to reflect before every posting to a social media site to consider if the posting could potentially violate any patient privacy laws and/or the content of this policy. If there is any doubt, physician learner should not continue with the posting.

Policy Violations

Failure to comply with the provisions of this policy will result in corrective action up to and including termination from the Residency program. Physician learner, faculty, and other GME staff are encouraged to report violations to UCF GME office and program leadership. Violations involving protected health information should be reported according to hospital/clinical site policies, and should include privacy and information security officers for both the hospital and UCF COM.

This policy governs all GME programs sponsored by UCF/HCA GME Healthcare GME. However, hospitals and clinical teaching sites may have additional policies related to the use of social media that are more restrictive and physician learner are subject to the policies of their respective teaching sites. Individual programs may provide additional policies.

References:

Federation of State Medical Boards. Model Policy Guidelines for the Appropriate Use of Social Media and Social Networking in Medical Practice. Available at

<http://www.fsmb.org/policy/advocacy-policy/policy-documents>

<http://www.fsmb.org/siteassets/advocacy/policies/social-media-and-electronic-communications.pdf>

Use of Information Technologies and Resources UCF policy 4-002.2 found at:

<http://policies.ucf.edu/>