

## PRIVACY PROGRAM BULLETIN: SOCIAL MEDIA USE

September 2018

**COMPLIANCE DEPARTMENT** 

Applicable Policies
Policy and Procedure (P&P)
1307, Social Media Policy

P&P 1426, Authorization and Consent to Photograph or Interview

## OTHER RESOURCES

UC Davis Health Social Media Toolkit

U.S. Department of Health & Human Services, Policies that Apply to Social Media

Background

As a HIPAA Covered Entity, every UC Davis Health workforce member is responsible for protecting patient information. Patient information, however, may become easily compromised when coupled with Social Media use. To prevent a compromise from occurring, it is imperative that UC Davis Health workforce member's understand the policy expectations regarding Social Media use.

## What You Should Know

Privacy laws and UC Davis Health policy prohibit a workforce member from disclosing Protected Health Information (PHI) or Medical Information on Social Media <u>unless</u> a signed patient authorization exists and it specifically allows the disclosure. This includes language or text about a patient and images or videos. While there may be instances where a patient could not be readily identified in a Social Media post (e.g., patient is not named), a reasonable basis to identify a patient may emerge (e.g., unique birthmark, tattoo, etc.) thereby leading to a privacy incident or privacy violation. As such, a signed authorization should always be obtained to guard against this potential consequence.

There are other general considerations to be made as well by UC Davis workforce members that use Social Media. For example, perception of University endorsement by use of name and/or emblem, disclosure of proprietary and/or confidential information, and principles of professionalism to name a few.

## Questions?

Please review Policy and Procedure 1307, Social Media Policy or contact UC Davis Health Public Affairs and Marketing at 916-734-9040 or hspublicaffairs@ucdavis.edu. You may also want to review the Social Media Toolkit that Public Affairs and Marketing has published on The Insider. Lastly, please do not hesitate to contact the UC Davis Heath Compliance and Privacy Office at: (916) 734-8808 or hs-privacyprogram@ucdavis.edu should you have any compliance or privacy-related questions.

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