



**POLICIES**

Effective Date: July 1, 2011

Retired:

Revised:

Approved by: WAYNE J. RILEY, M.D., MPH, MBA, MACP, PRESIDENT AND CEO

Subject: Office Of General Counsel/Compliance – Meharry Medical College  
Social Media Policy

**PURPOSE:**

This policy applies to Meharry Medical College (MMC), its participating physicians, clinicians, students, and all College employees, business associates, contractors, and sub-contractors.

**POLICY STATEMENT:**

To provide guidelines outlining how MMC supports institutional communication goals, as well as providing social computing guidelines for MMC faculty, staff, and students engaging in online discourse and identifying themselves with MMC.

MMC recognizes that such sites are increasingly useful communication tools and acknowledges the right of staff and employees to freedom of expression. However, all must be aware of the potential legal implications of material which could be considered abusive, defamatory or breach of confidentiality.

This policy is not intended for social media activities that do not associate or identify a faculty, staff, or student member with MMC, does not utilize MMC email addresses, and does not discuss MMC and intended purely for personal matters.

**DEFINITIONS:**

- A. Social Media Platforms are technology tools and online spaces that enable users to build, integrate or facilitate community interactions. Examples include but are not limited to: Facebook, Twitter, LinkedIn, YouTube and Web2, which make available personal views and information to the general public.
  
- B. Content Owner- For the purpose of this policy, are those assigned the responsibility of maintaining, monitoring, and moderating a MMC social media platform. Official communications refer to those done in MMC's

**Subject: Meharry Medical College Social Media Policy**

name, (Meharry Medical College Facebook page).

- C. Moderator- Assigned by Content Owner and/or department as the individual for moderating comments and postings by internal and external users, including deleting comments and posting that do not meet the criteria set forth in this policy.

**Note:** This policy does not apply to web pages hosted by Meharry Medical College which are covered by separate guidance at:

<http://www.mmc.edu/education/medical/media43eb.pdf>, Section VII of the Meharry Medical College Faculty Handbook.

## **PROCEDURE:**

### **A. Official Institutional Web Communications**

1. Institutional representation via online social media platforms can only be initiated and authorized through the efforts of the MMC Marketing and Communications department. There can be no official MMC site or pages on YouTube, Facebook, Twitter, etc. unless they are developed or authorized by the MMC Marketing and Communications department. Any sites or pages existing without prior authorization as required above will be subject to review when discovered and may be amended or removed.
2. MMC official sites on social media platforms can have pages or content areas that are assigned to departments, divisions or programs at MMC. These policies apply to such pages, as well as content maintained by MMC Marketing and Communications.
3. Content Owners, as named by their departments or department's leadership, are responsible for posting and using content and maintaining compliance with MMC Code of Conduct, Healthcare Insurance Portability and Accountability Act (HIPAA) and policies related to Conflicts of Interest, Privacy, Security, Safety,

**Subject: Meharry Medical College Social Media Policy**

and Human Resources, and Federal Education Records Protection Act (FERPA).

4. Content Owners are responsible for monitoring and maintaining web content as follows:
  - a. Contact must be accurate.
  - b. Proprietary financial, intellectual property, patient care or similar sensitive or private content may not be revealed.
  - c. Content Owners are responsible for gaining the express consent of all involved parties for the right to distribution or publication of recordings, photos, images, video, text, slideshow presentations, artwork and advertisements whether those rights are purchased or obtained without compensation.
  - d. Content Owners and/or Moderators sign a Content Owner/Moderator Terms and Agreement Form. This form is renewable annually and will be monitored by the MMC Marketing and Communications departments.

## **B. Guidelines for Online Professional or Personal Activity**

Online social media allow MMC faculty, staff, students, contractors, and vendors to engage in professional and personal conversations. These guidelines apply to ALL individuals who identify themselves with MMC and/or use their Meharry email address in social media platforms such as professional society blogs. These guidelines apply to private and password protected social media platforms as well as to open social platforms.

1. Follow the MMC Code of Conduct, HIPAA, Conflict of Interest Policy, Privacy and general behavior guidelines cited above including respecting copyrights and disclosures, and not revealing proprietary financial, intellectual property, patient care or similar sensitive or private content.
2. If individuals identify themselves as a member of MMC in any online forum and/or use a Meharry email address, they must make it clear that they are not speaking on behalf of MMC, and what they say is representative of their individual personal views and opinions and not necessarily the views and opinions of MMC.
3. Do not use MMC logos on personal social media sites.
4. Faculty, staff, students, contractors, and vendors must remember to