

GME CONSORTIUM POLICY AND GUIDELINES FOR USE OF ONLINE SOCIAL MEDIA

I. PURPOSE

The graduate medical education programs sponsored by Barnes-Jewish Hospital, St. Louis Children's Hospital and Washington University School of Medicine (collectively "GME Consortium") recognize Social Media is changing the way individuals and organizations communicate and share information. Residents and Fellows must recognize the public nature of these forums and the permanent nature of any postings. While Social Media can ease communication with friends and colleagues, it also presents a forum for lapses of professional behavior. Even when individuals take precautions to ensure enhanced privacy settings on Social Media sites, **all** postings should be considered public and freely visible. The GME Consortium has adopted the following policy and guidelines so Residents and Fellows may safely and responsibly use various forms of Social Media.

II. SCOPE

This policy describes the best practices for Residents and Fellows employed by or associated with Barnes-Jewish Hospital ("BJH"), St. Louis Children's Hospital ("SLCH"), and Washington University School of Medicine ("WUSM") who participate in Social Media. Residents and Fellows should follow these guidelines whether participating in Social Media personally or professionally, or whether they are using personal or employer issued electronic devices. This policy does not apply to protected concerted activity defined in Section 7 of the National Labor Relations Act.

III. DEFINITIONS

"Social Media" is a general term describing web-based, mobile, or other technologies for social networking and for sharing content and information. Examples of popular Social Media sites include Facebook, MySpace, LinkedIn, CaringBridge, Flickr, YouTube, and Twitter. The GME Consortium reserves the right to update or change this policy at any time.

IV. GUIDELINES FOR ETHICAL/PROFESSIONAL BEHAVIOR

Residents and Fellows must comply with the following when engaging in Social Media:

A. CONFIDENTIALITY

1. HIPAA and the HIPAA and Patient Privacy policies of BJH, SLCH, and WUSM apply to Social Media activities.

2. .Online discussions or comments regarding specific patients are prohibited, even if all identifying information is excluded.
3. Under no circumstances should photos of patients or photos depicting the body parts of patients be displayed online.

B. PATIENT CONTACT

1. Interactions with patients through Social Media are strongly discouraged. Such interactions may damage the physician-patient relationship, and have legal consequences.
2. Patient information should not be obtained on a social networking site or entered in the patient's medical record.
3. Never offer patient-specific medical advice on a Social Media site.

C. PROFESSIONALISM

1. Postings within Social Media sites are subject to the same professionalism standards as any other personal interactions. The permanent and public nature of on-line postings makes them subject to public scrutiny. Comments that are unprofessional, as determined by the GME Consortium in its discretion, or which violate the policies of BJH, SLCH and WUSM or HIPAA may result in disciplinary action..
2. Statements made within Social Media sites will be treated as if the statements were verbalized in a public place.
3. All posts should respect the intellectual property rights of others, including copyrights and trademarks. Permission may be required to post text, photos, videos or other media owned by others.
4. BJH, SLCH, and/or WUSM logos may not be used on any Social Media site without the approval of the Institution's Media/Public Relations department.
5. In online Social Media, the lines between public and private, personal and professional are blurred. Just by identifying yourself as a BJH, SLCH, or WUSM Resident or Fellow, you are creating perceptions about you or your employer and your Training Program by those who have access to your profile or blog. Be sure that all content associated with you is consistent with your position.
6. Any medically oriented posts or blogs should contain the disclaimer: "The posts on this site are my own and do not necessarily represent the views of my Training Program." BJH, SLCH or WUSM. For additional guidance go to medschool.wustl.edu/policies/website_privacy.
7. Use of Social Media sites or blogs may have legal ramifications. Comments made regarding care of patients or that portray you or a

colleague in an unprofessional manner may be used in court or other disciplinary proceedings such as the State Medical Licensing Board.

8. Unprofessional postings by others on your page may reflect poorly on you. Regularly monitor others' postings on any Social Media site you create or host.
9. Online relationships with attending physicians, fellows, supervising residents, interns, and other students are covered by the GME Consortium policy on consensual relations and sexual harassment. Cyber stalking, requests to those you supervise to engage in activities outside of work, and inappropriate postings to Social Media sites while supervising trainees can all be considered forms of sexual harassment.
10. Refrain from accessing personal Social Media sites while in clinical work areas.

D. PRIVACY/SECURITY

1. Due to continuous changes in these sites, closely monitor the privacy settings of your Social Media accounts to optimize their privacy and security.
2. It is advisable that you set your privacy profile so that only those people whom you provide access may see your personal information and photos.
3. Avoid sharing passwords or other identification numbers on any Social Media site including, addresses, telephone numbers, social security numbers, passport numbers or driver's license numbers, birth date, or any other data that could be used to obtain your personal records.
4. Others may post photos of you, and may "tag" you in photos. It is your responsibility to make sure these photos are appropriate and are not professionally compromising. "Untag" yourself from any inappropriate photos. Refrain from tagging others unless you have explicit permission from them to do so.
5. Maintain the privacy of colleagues, physicians, and other BJH, SLCH or WUSM employees when referring to them in a professional capacity unless they have given their permission for their name or likeness to be used.
6. Differentiate medical opinions from medical facts. The world of medicine is foreign to many, so readers may take your words at face value. Try to make clear what statements reflect your personal beliefs.

- V. WHEN COMMENTING ON BJH, SLCH OR WUSM SOCIAL MEDIA SITES:**
- A.** Follow all BJH, SLCH and WUSM policies and guidelines, including but not limited to:
 - 1. HIPAA, Release of Information, Conflict of Interest, Intellectual Property, and the site's User Terms and Conditions.
 - 2. This policy and these guidelines.
 - B.** Be professional and respectful in all postings. Identify yourself when representing an idea or opinion of BJH, SLCH, or WUSM.
 - 1. Disclose your association and your role.
 - 2. Use good judgment in these instances and strive for accuracy.
 - 3. Errors and omissions could result in liability for you or for BJH, SLCH or WUSM.
 - C.** Comments on BJH, SLCH, or WUSM sites that contain any of the following are subject to editing, rejection or deletion:
 - 1. Comments that are unprofessional or damaging to the reputation of BJH, SLCH or WUSM or any BJH, SLCH or WUSM employee.
 - 2. First/last names, identifying locations or other personal or patient information;
 - 3. Profanity, racist, sexist or other derogatory content;
 - 4. Plagiarism, false claims or infringement upon or violation of the rights of third parties such as copyright, trademark, trade secret, confidentiality, intellectual property, patent; and
 - 5. Spam, spyware, virus or other component or computer code or script that is or could be harmful.
 - D.** The Internet is simply an extension of the workplace under these circumstances and expectations are the same as if you were at work.

VI. COMPLIANCE WITH RELATED POLICIES

- A.** All other BJH, SLCH, and WUSM policies which may apply to the use of Social Media remain in full force and Social Media shall never be used in a way which violates any other policies or obligations. Residents and Fellows shall adhere to all applicable policies when using Social Media.

VII. VIOLATIONS

- a.** Residents and Fellows who, in the sole judgment of the GME Consortium, violate these guidelines will be subject to discipline, up to and including removal from their Training Program. Disclosure of patient information that violates HIPAA may also result in civil and criminal penalties.

VIII. FACT SCENARIOS

- **Example: The St. Louis Post Dispatch ran a story about a patient I cared for in the ICU. The medical details the Post published are wrong.**
 - Can I post a response to the Post Dispatch article on the Post Dispatch website?
 - No. Comments should not be made regarding the care or condition of specific patients.
 - What if I do not say in my response that I cared for the patient at BJH?
 - No. Online posts and discussions of specific patients should be avoided even if all identifying information is excluded. It is possible someone could recognize you or the patient to which you are referring.
- **Example: One of my patients asked to be my friend on Facebook.**
 - May I accept?
 - Interactions with patients within Social Media are strongly discouraged. This provides an opportunity for a dual relationship, which can be damaging to the physician-patient relationship, and can also carry legal consequences.
- **Example: This is an excerpt from my personal blog. In my “profile” I say I am a Resident at a hospital in St. Louis, MO.**

First night shadowing in the BJH ER. The attending had me entering chart data in a computer program I had never seen before. I'm fairly sure I only charted about 12% of what I was supposed to. The attending said I was slow – I couldn't believe he was criticizing me when I saw him give a chemo patient the wrong dosage. Tonight I am going to go to Bar Louie to throw back a few and blow off steam. Who wants to join?

- Is this ok?
 - It is never permissible to post information about specific events that occur with patients, this goes for errors or successes. Comments made regarding care of patients or that portray you or a colleague in an unprofessional manner can be used in court or other disciplinary proceedings such as the State Medical Licensing Board. Never post information about physicians or colleagues with whom you interact. It is not permissible to discuss alcohol related activities in posts which mention academic or professional responsibilities with GME Consortium related entities.