



**THE GEORGE  
WASHINGTON  
UNIVERSITY**

WASHINGTON, DC

**Responsible University Official:**

Senior Associate Dean, MD Programs

Senior Associate Dean, HS Programs

**Responsible Office:**

Office of the Dean, SMHS

**Most Recent Revision:** 07/23/2015

## **SOCIAL MEDIA AND EMAIL POLICY FOR SCHOOL OF MEDICINE AND HEALTH SCIENCES**

---

### **Policy Statement**

---

This Policy sets forth guidelines for faculty, residents, students and staff of the George Washington University School of Medicine and Health Sciences (SMHS) use of, and participation in, email and social media, including but not limited to blogs, wikis, social networks (such as Facebook, LinkedIn, MySpace or Twitter), multi-media networks (such as YouTube), social communities, forums, virtual worlds and other online spaces in which user-generated content is posted or displayed (“Social Media”). Any faculty resident, student, or staff who chooses to utilize email or post content on Social Media or otherwise through the internet must abide by this Policy.

Nothing in this Policy should be construed or applied to prohibit faculty, residents, students, and staff of SMHS rights under the National Labor Relations Act.

---

### **Reason for Policy/Purpose**

---

SMHS understands that many of its faculty, residents, students, and staff use email and may have personal blogs, web logs, wikis, or post to public websites or other forms of Social Media. SMHS recognizes the widespread use and availability of email and Social Media and respects the right of faculty, residents, students, and staff to use them as a medium of self-expression. However, SMHS wishes to ensure that you understand that you may be held accountable personally for your electronic statements and representations.

---

### **Who Needs to Know This Policy**

---

All students, residents, fellows, faculty, and staff of the School of Medicine and Health Sciences

# Table of Contents

## Page #

Policy Statement .....	1
Reason for Policy/Purpose .....	1
Who Needs to Know This Policy.....	1
Table of Contents .....	2
Policy/Procedures .....	2-5
Website Addresses .....	5
Contacts.....	5-6
Definitions.....	6-7
Related Information .....	7
Who Approved This Policy .....	8

## Policy/Procedures

### I. General Guidelines

Faculty, residents, students, and staff should be mindful that their emails and postings, even if done on personal devices, off premises or while off duty, could have an adverse effect on GW's institutional interests. With respect to email, communicating patient information through unsecure email systems could result in privacy being compromised even when the email is sent to another healthcare provider. The same principles and guidelines found in GW's policies and three basic beliefs apply to your activities online:

- Ultimately, you are solely responsible for what you email or post online.
- Use your best judgment and exercise personal responsibility. Before creating online content, stop to consider some of the risks and rewards that are involved.
- GW expects you to exercise personal responsibility whenever you participate in social media or other online activities.
- GW expects you to maintain your professional ethics obligations in your online activities, as in any other circumstance. Physicians and medical students should be familiar with the AMA Code of Ethics Opinion 9.124, Professionalism in the Use of Social Media.

Remember that there can be consequences to your actions in the digital world, both within GW, if your comments or online conduct violate GW policies, and with outside individuals and/or entities, including the health care organizations where you train or practice, with patients or vendors.

## **II. Specific Guidelines.**

To reduce the risks described above, faculty, residents, students, and staff must comply with the following guidelines when engaged in Social Media or other online activity:

1. Ensure that your emailing and social networking activity does not interfere with your work or workplace.
2. Consider your content carefully: be respectful and professional.
3. You should limit participation in Social Media activities during work time unless required by your position at GW; incidental use during break times or in a manner that is consistent with other general internet use is not prohibited by this Policy.
4. If you are providing care to a patient of MFA, GWUH or any other health care provider, or if you are training at a health care organization, HIPAA and the policies of the health care provider prohibit your disclosing any identifiable information about a patient except (a) as allowed by HIPAA or (b) pursuant to a patient's written, HIPAA compliant authorization as approved by that provider. By disclosing identifiable patient information on Social Media or email you risk penalties under the law and expulsion or other sanctions by the health care providers and GWU. Be safe: never disclose any patient information on social media, even if you do not use names.
5. Unless authorized to speak on behalf of GW as part of your job responsibility, you must be clear to your readers that the views expressed are yours alone and that they do not reflect the views of GW, by stating, for instance, "The views expressed in this post are my own. They do not represent the positions, strategies, or opinions of George Washington University."
6. Do not defame or otherwise discredit the products or services of GW, its physicians, affiliates or vendors.
7. You may not post fake blogs, create false positive or fake negative reviews of GW, its affiliates, policies, services and physicians or its competitors; nor may you impersonate someone associated with or speaking about care provided at a GW-affiliated institution.
8. Personal email addresses should be used to register on social networks, blogs or other online tools utilized for personal use.
9. You may not use GW logos, trademarks or proprietary graphics that would create the appearance that you are speaking on behalf of GW without prior

written authorization from appropriate Marketing or Communications leadership.

10. You may not use or disclose any patient identifiable information of any kind, including patient images, on any email or social media platform or smartphone application unless authorized by the patient's health care provider: MFA, GWUH, or another physician practice, hospital or other health care provider where you are practicing or training. Typically this will require the express written authorization of the patient using a form approved by the health care provider. Even if a patient is not identified by name, the use or disclosure of patient information could constitute a violation of the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), applicable state law and/or the policies of the MFA, GWUH, GW, or other health care organization.
11. Prior to establishing an online relationship with a GW vendor through social networking sites, you should consider potential conflict of interest issues, given the requirements of the GW Conflict of Interest Policy.
12. Physicians should follow the AMA Code of Ethics, which states: "If they interact with patients on the Internet, physicians must maintain appropriate boundaries of the patient-physician relationship in accordance with professional ethical guidelines, just as they would in any other context. ... To maintain appropriate professional boundaries physicians should consider separating personal and professional content online." AMA Code of Ethics Opinion 9.124. This is good guidance for any of the health professions, and for those in training.
13. GW strongly urges that managers not ask to be a part of a subordinate's social media network – for example, by sending or accepting "friend" requests – unless you are authorized by your job responsibility at GW to do so. Any faculty, resident, student, or staff may reject, without fear of retaliation, any request (such as a "friend" or connection request) from any other employee that, if accepted, would permit access to a private social media site or page.
14. This Policy and these guidelines apply even if your Social Media activity is anonymous or under a pseudonym.
15. All contents of GW's electronic resources and communications systems are the property of GW. Therefore, employees should have no expectation of privacy whatsoever in any message, file, data, document, fax, Social Media post, message, or any other kind of information of communication transmitted, received, printed, stored or recorded on GW's electronic information and communications systems.. GW reserves the right to monitor, and review, without further notice, every faculty, resident, student, and staff's activities using GW's IT resources and

communication systems, including, but not limited to, Social Media use, postings and activities. You consent to such logging and monitoring by your acknowledgement of this Policy and your use of such electronic resources and systems. Do not use GW's resources and communication systems for any matter that you desire to be kept private or confidential from GW.

16. GW, in its sole discretion, reserves the right to filter access to certain external websites based on content.

### III. Violations

Suspected violations of this Policy may be subject to disciplinary action.

## Website Addresses for Applicable University Policies:

[GW University Policies](#)

GW University Social Media Policy:

<http://my.gwu.edu/files/policies/SocialMediaPolicyFINAL.pdf>

---

## Contacts

---

Subject	Contact	E-mail	Phone
General Questions	Compliance & Privacy Office	<a href="mailto:comply@gwu.edu">comply@gwu.edu</a>	(202) 994-3386
Employee-Related Benefits and Services	Employee Benefits Administration	<a href="mailto:benefits@gwu.edu">benefits@gwu.edu</a>	(703) 726-8385
Fundraising Activities	Associate Vice President for Development in the Medical Center		(202) 994-7511
Marketing Activities	Assistant Vice President for Medical Center Communications and Marketing	<a href="mailto:mccminfo@gwumc.edu">mccminfo@gwumc.edu</a>	(202) 994-3121

Research	Associate Vice President for Research		(202) 994-2995
Student Health Information	Registrar Information or Dean of Students/Student Affairs Specific to the Student's School	<a href="mailto:regweb@gwu.edu">regweb@gwu.edu</a>	(202) 994-4900

---

## Definitions

---

### **Confidential Information**

Includes, but is not limited to, the following: any information about the existence or terms of any potential acquisitions by GW; ideas, discoveries, designs, inventions, improvements and trade secrets; know-how; writings and other works of authorship; financial and accounting information; organizational structure information; GW expenditures, marketing plans and vendor lists and data; all other similar information that relates in any manner to the actual or anticipated operations of GW. Confidential Information may also include images of GW property or assets if the images reflect, reveal or contain Confidential Information as defined above.

### **Covered Entity**

A health plan or health care provider that electronically submits certain administrative and financial transactions. *Note: GW is not a covered entity under the HIPAA regulations.*

### **Health Care**

Care, services, supplies or treatment related to the health of an individual including but not limited to:

- (1) Preventive, diagnostic, therapeutic, rehabilitative, maintenance, or palliative care, and counseling, service, assessment, or procedure with respect to the physical or mental condition, or functional status, of an individual or that affects the structure or function of the body; and
- (2) Sale or dispensing of a drug, device, equipment, or other item in accordance with a prescription.

**Individually  
Identifiable  
Health  
Information**

A subset of health information that identifies the individual or can reasonably be used to identify the individual.

**Protected  
Health  
Information**

Individually identifiable information *in the custody of a covered entity* relating to the past, present or future physical or mental health or condition of an individual, provision of health care to an individual, or the past, present or future payment for health care provided to an individual.

**Student**

For the purposes of this Policy, the term student encompasses undergraduate and graduate students, residents and fellows.

**Treatment,  
Payment and  
Health Care  
Operations**

- **Treatment** means the provision, coordination, or management of health care and related services, consultation between providers relating to an individual, or referral of an individual to another provider for health care.
- **Payment** means activities undertaken to obtain or provide reimbursement for health care, including determinations of eligibility or coverage, billing, collection activities, medical necessity determinations and utilization review.
- **Health Care Operations** includes functions such as quality assessment and improvement activities, reviewing competence or qualifications of health care professionals, conducting or arranging for medical review, legal services and auditing functions, business planning and development, and general business and administrative activities.

**University  
Component**

A university clinic, program, center, or department that provides health or health-related services. Examples of University Components include, but are not limited to: EMERG; Student Health Services; Disability Support Services; counseling centers and clinics; research clinics and athletics clinics.

**Related Information**

[Data Classification Security Policy](#)

[Health Information Privacy Procedures for Medical Center Development Activities](#)

[Information Security Policy](#)

[Mobile Device Security Policy](#)

[Privacy of Student Records Policy](#)

[U.S. Department of Health and Human Services](#)

---

## **Who Approved This Policy**

Executive Committee of the SMHS Faculty Assembly July 23, 2015

---