

Policy Title: Social Media Policy	Policy Number: NATL.BSCPR.001
Owner Department: Brand Strategy Communications and Public Relations	Effective Date: 09/15/2011
Custodian: National Public Relations and Media Manager and Senior Communications Consultant	Page: 1 of 4

1.0 Policy Statement

Social media may be used by Kaiser Permanente employees for business-related purposes subject to the restrictions set forth in this policy. These restrictions are intended to ensure compliance with legal and regulatory restrictions and privacy and confidentiality agreements. Social media includes items such as blogs, podcasts, discussion forums, and social networks.

2.0 Purpose

The purpose of this policy is to provide KP employees with requirements for participation in social media, including KP-hosted social media, and in non-KP social media in which the employee's KP affiliation is known, identified, or presumed.

3.0 Scope/Coverage

This policy applies to all employees who are employed by the following entities (collectively referred to as "Kaiser Permanente"):

- 3.1 Kaiser Foundation Hospitals, Inc., and Kaiser Foundation Health Plan (together, KFH/HP);
- 3.2 KFH/HP's subsidiaries;
- 3.3 The Permanente Medical Group (TPMG) [NOTE: This policy does not apply to physicians, podiatrists or Vice Presidents of TPMG, who are covered by separate TPMG policies]; and
- 3.4 Southern California Permanente Medical Group (SCPMG) [NOTE: This policy does not apply to physicians of SCPMG,

4.0 Definitions

- 4.1 **Electronic Media** - Non-computing devices, e.g., flash memory drives, CDs DVDs, tapes, hard disks, internal memory, and any other interchangeable, reusable, and/or portable electronic storage media (1) on which electronic information is stored, or (2) which are used to move data among computing systems/devices.
- 4.2 **KP Information** - Information in any form or media that is created by or on behalf of KP in the course and scope of its business, regardless of whether that information is maintained or stored by KP and others on KP's behalf. Examples of KP information include, but are not limited to, patient and member records, personnel records, financial information, company competitive information, KP-developed intellectual property, and business e-mail messages.
- 4.3 **Member/Patient Identifiable Information (MPII)** – Any individually identifiable information regarding a member/patient of KP collected, received, created, transmitted, or maintained in connection with his/her status as a member or patient, such as PHI and CHD. MPII includes, but is not limited to, information about a member/patient's physical or mental health, the receipt of

Policy Title: Social Media Policy	Policy Number: NATL.BSCPR.001
Owner Department: Brand Strategy Communications and Public Relations	Effective Date: 09/15/2011
Custodian: National Public Relations and Media Manager and Senior Communications Consultant	Page: 2 of 4

health care, or payment for that care; member/patient premium records, enrollment and disenrollment information; name, address, Social Security Number, account number, security code, information from or about transactions, driver's license number, financial or credit account numbers, phone numbers, ISP and Internet domain addresses, and other personal identifiers. MPII does not include individually identifiable information in KP employment records; however, it may be subject to other state and federal privacy protections. MPII does not include individually identifiable information (such as a cell, home or business phone number) that a workforce member obtains, transmits, or maintains about another workforce member in connection with a personal or employment-related relationship with that person.

- 4.4 Podcast** – A collection of digital media files distributed over the Internet, often using syndication feeds, for playback on portable media players and personal computers.
- 4.5 Protected Health Information (PHI)** - Individually identifiable information (oral, written or electronic) about a member/patient's physical or mental health, the receipt of health care, or payment for that care. PHI includes individually identifiable member/patient payment, dues, enrollment and disenrollment information. Individually identifiable health information in KP employment records is not PHI; however, it may be subject to other state and federal privacy protections.
- 4.6 RSS feeds or Syndication feeds** - A family of different formats used to publish updated content such as blog entries, news headlines or podcasts and "feed" this information to subscribers via e-mail or by an RSS reader. This enables users to keep up with their favorite Web sites in an automated manner that's easier than checking them manually (known colloquially as "really simple syndication").
- 4.7 Social media** - Includes but are not limited to blogs, podcasts, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., Wikis), microblogs such as Twitter and Yammer, RSS feeds, video sharing, consumer ranking sites such as Yelp, and social networks such as Facebook and MySpace.
- 4.8 Web Log, or Blog** – A site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.
- 4.9 Wiki** - allows users to create, edit, and link Web pages easily; often used to create collaborative Web sites and to power community Web sites.

5.0 Provisions

5.1 KP-Hosted Sites

- 5.1.1 Using Social Media.** Employees are expected to adhere to KP compliance requirements and the KP Principles of Responsibility when using or participating in social media. All the rules that apply to other KP communications apply here, specifically: respecting members, patients, customers and one another; protecting confidentiality, privacy and security; and safeguarding and proper use of KP assets.



Policy Title: Social Media Policy	Policy Number: NATL.BSCPR.001
Owner Department: Brand Strategy Communications and Public Relations	Effective Date: 09/15/2011
Custodian: National Public Relations and Media Manager and Senior Communications Consultant	Page: 3 of 4

5.1.2 Be Respectful. Employees may not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting to KP-hosted sites.

5.1.3 KP-Hosted Blogs. KP-hosted blogs must focus on subjects related to the organization.

5.1.4 Abide by the law and respect copyright laws. Employees may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws. For KP's and our employees' protection, it is critical that everyone abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.

5.1.5 Obtain pre-approval before setting up KP-hosted sites. Employees must seek approval from their supervisor before setting up a KP-hosted blog or other social media content created to communicate information about KP.

5.2 Non-KP Hosted Sites

5.2.1 Proprietary Information. Employees may not disclose any confidential or proprietary information of or about KP, its affiliates, vendors, or suppliers, including but not limited to business and financial information, represent that they are communicating the views of KP, or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of KP.

5.2.2 Member/Patient Confidentiality. Employees may not use or disclose any member/patient identifiable information of any kind on any social media without the express written permission of the member/patient. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and KP policy.

5.3 Self-Hosted Sites. Employees must not say or suggest that the views and opinions they express related to KP and health care topics represent the official views of KP.

5.4 Requirements Applicable to Both KP and Non-KP Hosted Sites. This policy applies to employees using social media while at work. It also applies to the use of social media when away from work, when the employee's KP affiliation is identified, known, or presumed. It does not apply to content that is non-health care related or is otherwise unrelated to KP.

6.0 References and Appendices

6.1 References

Policy Title: Social Media Policy	Policy Number: NATL.BSCPR.001
Owner Department: Brand Strategy Communications and Public Relations	Effective Date: 09/15/2011
Custodian: National Public Relations and Media Manager and Senior Communications Consultant	Page: 4 of 4

- 6.1.1** Sanctions by KP Against Workforce Members Who Fail To Comply NATL.PS.019
- 6.1.2** Electronic Media Handling NATL.NCO.ISP.107
- 6.1.3** Acceptable Use of KP Computing Systems/Devices NATL.NCO.ISP.161
- 6.1.4** Non Retaliation NATL.NCO.3
- 6.1.5** Electronic Asset Usage NATL.HR.025
- 6.1.6** Secure Electronic Storage of Member/Patient Data NATL.NCO.PS.024
- 6.1.7** Disclosure Controls & Procedures NATL.FIN.ACCT.16.E
- 6.1.8** Kaiser Permanente Principles of Responsibility

6.2 Appendices

- 6.2.1** Source for social media terms – Wikipedia.com
- 6.2.2** Social Media Best Practices

7.0 Approval(s)

This policy was approved by the following representative of Kaiser Foundation Health Plan, Inc., Kaiser Foundation Hospitals and their subsidiaries.

Diane Gage Lofgren, Senior Vice President, Brand Strategy, Communications & PR

Signature: _____ s/ "Signature on File" _____ Date: _____ 09/15/2011 _____

Philip Fasano, Senior Vice President, Chief Information Officer

Signature: _____ s/ "Signature on File" _____ Date: _____ 09/15/2011 _____

POLICY LIFE HISTORY

ORIGINAL APPROVALS	REVISION APPROVALS	UPDATE APPROVALS
ORIGINAL APPROVAL DATE(S): 05/06/2009	REVISION APPROVAL DATE(S):	UPDATE APPROVAL DATE(S):
ORIGINAL EFFECTIVE DATE(S): 04/30/2009	REVISION EFFECTIVE DATE(S):	UPDATE EFFECTIVE DATE(S):
ORIGINAL COMMUNICATION DATE(S): 05/13/2009	REVISION COMMUNICATION DATES(S):	UPDATE COMMUNICATION DATE(S):