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
Proprietary Information. Kaiser Permanente. All rights reserved.
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**
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

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