Managing Social Media Risks in Healthcare

Social media is a ubiquitous influence in nearly all areas of industry, including healthcare. Because of social media's rapid expansion and increasing popularity, many healthcare organizations, providers, and staff have embraced these technologies for marketing, advertising, and patient education and engagement. Leveraging social media for these purposes can be beneficial, but it also presents various challenges and risks.

Using this checklist may help healthcare organizations focus on important risk management considerations whether they are already using social media or planning to implement a new policy.

	Yes	No
Has your organization considered its social media strategy, including the goal of the communication (e.g., education, advertising, etc.), the target audience, and the types of information it will promote?	☐	☐
Does your organization have an approved policy or set of detailed policies regarding the use of social media, including email?	☐	☐
Does your organization include staff members in the initial planning and drafting of policies to help identify and assess potential issues?	☐	☐
Does your organization provide training on social media policies as well as discussions about the potential risks and liability issues associated with social media as part of new employee orientation and ongoing staff education?	☐	☐
Do your organization's social media policies specify who is authorized to develop or curate content, and do they outline a detailed plan for content review and approval?	☐	☐

	Yes	No
Does your organization ensure that any content that is posted or published on any social media sites does not contain identifying information (including photographs and testimonials) without the patient's permission and written consent?	☐	☐
Does your organization ensure that the patient's consent to post or publish on social media explicitly states how the information will be used?	☐	☐
Has your organization appointed someone who is familiar with HIPAA and state privacy regulations to review social media content to ensure that the information to be posted or published does not violate patient confidentiality?	☐	☐
Does your organization include standard disclaimers and disclosure statements with each electronic interaction?	☐	☐
Have providers and staff members been trained on HIPAA and state privacy laws, and are they aware of their obligation to maintain patient privacy in all social media interactions?	☐	☐
Do providers and staff members sign confidentiality agreements acknowledging their duty to maintain patient privacy?	☐	☐
Does your organization keep signed copies of confidentiality agreements in each employees personnel file?	☐	☐
Do your organization's social media policies include disciplinary actions for policy violations that are consistent with existing patient privacy and confidentiality policies?	☐	☐
Are providers and staff trained on the appropriate method for reporting inappropriate use of social media?	☐	☐
Has your organization outlined the appropriate steps for monitoring online presence and managing negative online reviews or comments from consumers, patients, and employees? (For more guidance, see MedPro's *Risk Tips: Managing Negative Online Reviews From Patients*.)	☐	☐

	Yes	No
Are providers and staff members aware that responding to a patient post or review on a social media site might violate privacy laws, and are they aware of potential disciplinary actions?	☐	☐
Do providers and staff members understand the technical limitations and terms and conditions of any social media sites that they plan to use? For example, information sent via messaging functions is likely not encrypted, and the site might maintain the right to access any personal information.	☐	☐
Do the organization's existing information technology security policies and procedures cover social media use?	☐	☐
Does the organization create policies that are flexible and adaptable to new or changing social media technologies to avoid the need for constant updating?	☐	☐
Has your organization incorporated social media activities into risk assessment and quality improvement initiatives?	☐	☐