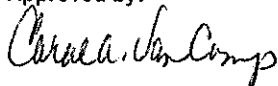
 <p>HAWAII HEALTH SYSTEMS CORPORATION "Touching Lives Everyday"</p> <p>Policy</p>	<p>Quality Through Compliance</p>	<p>Policy No.: CMP 017A</p>
		<p>Revision No.: 1</p>
<p>Subject: Policy for Use of Social Networking and Other Electronic Media</p>	<p>Issued by: Audit and Compliance Committee</p>	<p>Effective Date: October 13, 2011</p>
	<p>Approved by:  HHSC Board of Directors By: Carol A. Van Camp Its: Secretary/Treasurer</p>	<p>Supersedes Policy: CMP0017</p>
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I. **PURPOSE:** To set forth policy for regarding the use (both business and personal) of (i) social networking websites, (ii) blogs, (iii) video sharing websites and (iv) any other websites or electronic media (phones, texting, electronic pads, etc.) that allow for user comment or sharing of information. This policy is intended to prohibit employees from the inappropriate use of social or electronic media when conveying protected health and other confidential or statutorily protected information.

II. **DEFINITIONS:**

Code of Conduct: HHSC's manual that summarizes the ethical and legal standards by which employees, management, Board of Directors, medical staff, and other agents will conduct themselves to protect and promote system-wide integrity. The Code of Conduct provides information on protecting patients' and other confidential information, harassment and non-retaliation, and other standards of conduct.

Electronic Media: Refers to forms of equipment (HHSC owned or personal) such as phones, cell phones, texting, pads, etc.) that are able to convey and share information in picture or text form to others.

Social Media: Refers to social networking websites, video sharing websites, on-line comments and blogs. Social media includes, but is not limited to, methods of electronic communication such as blogs, texting, twittering or tweeting, podcasts, discussion forums, and social networks

Social Networking Websites: On-line communities used for social interaction. Includes, but is not limited to, sites such as Facebook, MySpace and LinkedIn.

Blogs: On-line journals or areas on websites that allow users to comment or provide commentary that is available to the public.

Video Sharing Websites: On-line communities where users can upload and share videos (for example, YouTube) and where the public can view and comment on the videos.

On-line comments: These are comments, "posts," or other types of responses left on websites, blogs, and personal e-pages.

III. POLICY:

- A. The use of social media for personal reasons on work time is prohibited other than lunch or approved breaks. Use of social media for personal reasons on facility equipment is prohibited at all times.
- B. HHSC does not allow any use of social or electronic media that results in disclosure of protected health information, confidential employee information, or other information protected from disclosure by law, the HHSC Code of Conduct, or HHSC policy that has not been approved by management and cleared by the HHSC Security Officer.
- C. Posting any patient information using social media can be considered a violation of federal and state law as well as a violation of HHSC's privacy and security policies and the Code of Conduct. Anyone who posts patient information without prior approval or using approved methods and equipment could also face personal liability including severe fines and penalties. Personal information includes, but is not limited to, medical information, photographs, images, descriptions and commentary about situations occurring at work that involve patients.
- D. It is prohibited to disclose protected health information using any equipment, website or mechanism whether on business or personal time, whether on business or personal equipment that has not been approved by management and cleared by the HHSC Security Officer.
- E. All use of electronic media, social media, and social networking sites for business purposes must be approved by the President and Chief Executive Officer, Regional Chief Executive Officer, or designee.
- F. No information shall be posted that would lead to the determination or "figuring out" by deduction protected health or confidential information by others without approval.
- G. HHSC logos or trademarks should only be used with permission by the RCEO or designated person. Only use "HHSC" if doing so is part of your job and it is for business purposes.
- H. Any known or suspected violation of law or other wrongdoing in connection with social or electronic media use shall be reported immediately. Reports may be communicated to a manager/supervisor, regional compliance officer, Regional Chief Executive Officer, Chief Compliance and Privacy Officer, and/or via the Corporate Compliance Hotline.
- I. HHSC's Code of Conduct prohibits discrimination and/or harassment. If harassing comments are posted using social media, it is a violation of our Code of Conduct. This includes harassing comments about any colleague (peer, supervisor, direct report, etc.), board member, or patient.
- J. Any employee who participates in any wrongful use of social or electronic media which results in disclosure of protected health information, confidential employee information, or other information protected from disclosure by law, Code of Conduct, or HHSC policy is subject to action in accordance with the disciplinary provisions of an applicable

collective bargaining agreement, civil service rules, HHSC policies or other applicable state or federal regulation.

- V. **APPLICABILITY:** This policy shall apply to all HHSC facilities, employees, medical staff, Board members, auxiliary and foundation members, vendors, contractors, and other agents.
- VI. **AUTHORITIES:** HRS § 323F; 45 C.F.R § 164.502; HHSC Code of Conduct; State of Hawaii Constitution, Article VII, Section 4 and Article I, Section 6; Hawaii State Ethics Code, HRS Chapter 84.