



HEALTH AND HUMAN SERVICES POLICY

Department: HHS Administration

Policy Number: 3154

Policy Title: Social Media Use

Revision History: 12/2019

Revised by/Date: Holly Hunter 10/2023

Commissioner Initials: *[Signature]* **Director Initials:** *[Signature]*

Approved by: *C. Kalk*

Date: 10/30/23

Carmen Kalk, Executive Director of Human Services

Approved by: *J. Manary*

Jan Manary, Executive Director of Health Services

POLICY: To protect the confidentiality of our clients and patients and to reduce the possibility of risk to Mille Lacs Band Health and Human Services (HHS) and its reputation, the following policy elements will be honored by all HHS employees and programs.

Personal Social Media Use

HHS discourages the use of company time for personal social networking and expects all HHS employees to be aware of their actions while engaging in personal social networking. HHS expects employees to engage in no more than incidental personal use of social media while working. Overuse of personal social media while at work may lead to disciplinary action.

HHS discourages “friending” of patients or clients on personal social media websites. Staff providing direct care or services generally should not initiate or accept friend requests from patients or clients unless the friendship predates the professional relationship. When a social media friendship predates a professional relationship, clear boundaries should be discussed with the patient or client.

Professional Social Media Use

Social media accounts or profiles for professional use by HHS or HHS programs may only be used when approved by the Commissioner of HHS and within the parameters of this policy. A procedure document will be drafted to outline how a specific social media page will be maintained within the parameters of this policy. HHS social media pages are managed by a defined set of users, aiming to minimize the number of people with access while accommodating all HHS programs who can benefit from posting on the page. Posts and comments will be monitored daily and questions responded to within the same day as they are posted. Confidential patient and client information is not allowed on HHS social media pages. Confidential information will be removed from an HHS social media page immediately once viewed by an account owner or reported to the HHS Quality and Compliance department.

Policy Violations

Any social media posts containing inappropriate, derogatory, or inaccurate information or posts that may be considered defamatory to HHS and HHS programs should be reported to a supervisor as soon as possible. Employees are not advised to respond to these posts.

Violations of this policy may result in disciplinary action in accordance with Mille Lacs Band of Ojibwe (MLBO) Personnel Policies and Procedures.



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AUTHORITY: MLBO Personnel Policies and Procedures; Health Insurance and Portability and Accountability Act of 1996

POLICY DETAILS: In order to protect the integrity of the organization and the programs operating within HHS, the following expectations are set related to social media posts on personal accounts and on HHS accounts:

1. Follow all applicable MLBO Personnel Policies and Procedures and HHS policies. For example, you must not share confidential or proprietary information about MLBO, and you must maintain patient and client privacy.
2. If you communicate on the public internet about HHS or HHS-related matters, be professional, use good judgement and be accurate and honest in your communications. Errors and omissions or unprofessional language or behavior reflect poorly on HHS and may result in liability for you or HHS.
3. Be respectful and professional to fellow employees, business partners, competitors, clients, and patients.
4. Ensure your social media activity does not interfere with your work commitments.
5. HHS discourages staff in management/supervisory roles from initiating "friend" requests with employees they manage. Managers/supervisors may accept friend requests if initiated by the employee, and if the manager/supervisor does not believe it will negatively impact the work relationship.
6. Unless it is preapproved by the Commissioner of HHS, your social media name, handle, and URL should not include the MLBO HHS name or logo.

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Compliance - Posting Date	10/30/2023 
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