

Social Media Policy

ROWAN UNIVERSITY POLICY

Title: *Social Media Policy*

Subject: *University Communications*

Policy No: *UWS: 2014:01*

Applies: *University-wide*

Issuing Authority: *Vice President of Student Life/Dean of Students*

Responsible Officer: *Social Media Officials*

Adopted: *06/06/14*

Last Revision: *08/01/2020*

Last Reviewed: *08/01/2020*

I. PURPOSE

This policy sets forth the acceptable uses regarding the access and use of social media for University-affiliated communications. It also includes professionalism requirements for University's medical students who, as medical professionals in training, must uphold the highest standards of the medical profession and protect the privacy and confidentiality of patients.

II. ACCOUNTABILITY

Under the direction of the Vice President of Student Life/Dean of Students, Social Media Officials and other University officials shall implement and ensure compliance with this policy.

III. APPLICABILITY

This policy applies to all members of the University community who use social media for University-affiliated communication and those who use the University name in association with social media accounts.

IV. DEFINITIONS

1. See Attachment 1 - Definitions

V. REFERENCES

1. See Attachment 2 - References

VI. POLICY

1. The University expects members of the University community will access and use social media in a manner that:
 - a. Does not compromise the confidentiality, integrity, or accessibility of those assets; and
 - b. Complies with all applicable University policies, procedures, and guidelines and is in accordance with all applicable federal, state, and local laws and regulations governing the use of computers and the Internet; and
 - c. Protects the University's reputation and promotes its educational mission; and
 - d. Conforms to all policies and procedures set forth by the University. Nothing in this policy supersedes standards set forth by Information Resources & Technology, the Department of Public Safety, the Office of Emergency Management, and Student Life/Student Affairs; and

- e. Recognizes the rights of the members of the University community guaranteed by the Constitution of the United States and the State of New Jersey, including but not limited to freedom of speech, inquiry, and expression; and
 - f. Complies with all Terms set forth by each respective social media network.
2. These obligations apply regardless of where access and use originate.
 3. All University-affiliated social media, including but not limited to the account itself, content and audiences, are the property of the Account creators and administrators have no ownership rights whatsoever.
 4. The content contained herein is not intended to be comprehensive, as the evolution of technology precludes the University from anticipating all potential means of storing, capturing and transmitting information. This policy will be monitored and revised as deemed necessary.
5. Requirements
 - a. University affiliated social media account administration.
 - i. Any member of the University community engaging in University-affiliated social media must do so using an administrative or resource University email address to which more than one member of the University community has access.
 1. A unique email must be created expressly for this purpose by submitting a request at rowan.edu.
 2. No member of the University community should be required, asked, or permitted to use a private, personal account for the purpose of creating social media account(s) on behalf of the University.
 3. If, for any reason, a social media account is presently linked to an individual person's email account, that person relinquishes all rights to the account.
 - ii. Social media contacts shall acknowledge that:
 1. They have obtained permission from their supervisor/management to use social media in an official capacity for their unit; and
 2. They must maintain access to and security of all social media usernames and passwords; and
 3. They must monitor and maintain the account(s) on a weekly basis. Inactive accounts may be subject to deactivation or deletion; and
 4. Resources will be made available for their reference at rowan.edu/socialmedia; and
 5. Other social media users may have different interests, attitudes, and opinions than those of the University. Social media contacts reserve the right to remove content, block users, or refrain from interacting with anyone for content deemed to be unlawful. Social media contacts do not reserve the right to remove content deemed to be a difference of opinion; and
 6. Social media contacts' administrative access to social media accounts will be terminated upon exit from the University or assignment to another job.
 - iii. All University-affiliated social media should be explicit regarding the relationship of the platform to the University.
 - iv. All social media graphics and naming conventions must abide by the University's Graphic Standards policy.
 1. University trademarks and logos, including but not limited to the University seal, torch, and athletics logo, may not be used without approval.
 2. Rowan University' or 'Rowan' should be used within the social media username and prepend any qualifiers. 'RU' and other acronyms should not be used within the username unless the expanded versions do not adhere to unique platform restrictions.
 3. Units that have multiple social media accounts should use the same photo and name across all platforms.
 - b. Personal Use of Social Media
 - i. Members of the University community may not use the University name, email addresses, or University logos/trademarks on social media to post information in a manner that may be interpreted as representing an official position of the University, or which may misrepresent the University's viewpoint. All accounts and posts in which a user identifies

him/herself as a member of the University community should clearly communicate: "The views and opinions expressed are strictly those of the author. The contents have not been reviewed or approved by Rowan University" or "Views/opinions are my own."

- ii. Members of the University community may not access social media in a manner that interferes with or delays completion of their professional responsibilities.
- iii. The University name and University email addresses may not be used on social media sites and online forums for personal communication.
- iv. Members of the University community may be held legally liable for what they post on their personal social media site(s) and should therefore refrain from any communications considered punishable under state or federal law.
- v. Individual students and student organizations are expected to abide by the Student Code of Conduct. Students may be accountable to the University for acts on personal social media site(s) that violate the Student Code of Conduct.
- vi. Any attempt by a member of the University community to obscure his/her identity as a means to circumvent the prohibitions listed herein by representing himself/herself as another person, real or fictitious, is strictly prohibited.
- c. All University-affiliated social media may not be used for any commercial business, financial transactions, or interactions that would otherwise be considered irrelevant.
- d. Rights and permissions must be secured before posting, sharing or distributing copyrighted materials, including but not limited to music, art, photographs, texts, portions of video, or information considered proprietary by a University partner, vendor, affiliate or contractor. This does not include archives from University Relations, photos taken in a public venue, and photos in which individuals are not clearly identifiable.
- e. Social media tools may not be used to communicate or store information classified as confidential or private or otherwise considered privileged or sensitive by the University; which compromises the privacy of a member of the University community or its clients; or is considered confidential under applicable federal and state laws including HIPAA and FERPA.
- f. Social media does not replace or otherwise eliminate the need to use the University's existing recruitment systems and processes for posting positions, collecting applications, conducting background checks, making offers of employment and other related activities.

6. Crisis Management

- a. The catch-phrase, "If you see something, say something" should be a standard rule in social media monitoring. In the event that information surfaces on social media sites that is deemed as harassing or threatening in nature, or helpful in a crisis or investigation, it must be immediately reported to 911 and/or Public Safety at 856-256-4911 with the following if available:
 - i. Screenshot(s) of and link to the communication.
 - ii. Username(s) of the person(s) involved in the communication.
 - iii. As much information about the incident as possible.
- b. In the event of a crisis on campus, emergency messaging will be issued through the Department of Public Safety, the Office of Emergency Management, and/or the Office of the President, and distributed according to the University's Emergency Response Team Communication Protocol. These messages will also be distributed on official University social media accounts as needed.
 - i. Rowan University:
 1. Facebook: <https://www.facebook.com/RowanUniversity/>
 2. Instagram: <https://www.instagram.com/rowanuniversity/>
 3. Twitter: <https://twitter.com/rowanuniversity>
 - ii. CMSRU:
 1. Facebook: <https://www.facebook.com/coopermedschool>
 2. Instagram: <https://www.instagram.com/cmsru/>
 3. Twitter: <https://twitter.com/coopermedschool>
 - iii. RowanSOM:
 1. Facebook: <https://www.facebook.com/RowanSOM/>
 2. Instagram: https://www.instagram.com/rowan_som/
 3. Twitter: <https://twitter.com/rowansom>
 - iv. Share verbatim only the messaging provided by the aforementioned accounts to ensure only the correct information is disseminated. Do not share any information that does not come from any of the aforementioned University sources.

- v. Postpone/delete any previously scheduled social media content and refrain from posting unrelated information on social media until after the crisis.
- vi. If any social media messages could be used to help in a crisis, alert 911 or the Department of Public Safety immediately.

7. Additional Requirements for Medical School Communities

- a. Misrepresentation in any social media by any member of the CMSRU or RowanSOM communities, regarding the status of his/her credentials as a medical student or medical professional, is strictly prohibited.
- b. Specific Restrictions under HIPAA and FERPA for Medical Students
 - i. Posting PHI on social media by any individual within the CMSRU or RowanSOM communities is strictly prohibited under the HIPAA regulations, which apply to any information related to patients.
 - 1. Never post a photograph or image of a patient to any electronic media, other than the patient's electronic medical record. Use of cameras or cell phone cameras in the patient care setting shall be for the sole purpose of assisting in the care and education of the patient for educational purposes. Any photographs taken in the patient care setting must be posted to the patient's electronic medical record.
 - 2. Removal of an individual's name does not constitute proper de-identification of PHI. Inclusion of data such as age, gender, race, diagnosis, date of evaluation, type of treatment, or the use of a highly specific medical photograph (such as a before/after photograph of a patient having surgery or a photograph of a patient from medical outreach trips) may still allow the reader to recognize the identity of a specific individual.
 - 3. Never post derogatory or defamatory remarks about any patient (either current or past) to any social media, including any social media deemed to be "private."
 - ii. Posting of any student records on social media by any individual within the CMSRU or RowanSOM community is strictly prohibited under the FERPA regulations.
 - 1. FERPA-protected academic information of another medical student or trainee might include, but is not limited to, course or clerkship grades, narrative evaluations, examination scores, or adverse academic actions.
 - iii. All individuals within the CMSRU and RowanSOM communities must take steps to ensure compliance with all federal and state laws and regulations, including HIPAA and FERPA, by ensuring that their social media has the appropriate privacy settings to avoid the inadvertent dissemination of confidential information, with the understanding that even if they limit the number of people who can see their personal information, others who have access to this information may share it more broadly.
 - iv. It is inappropriate for a CMSRU or RowanSOM medical student to accept "friend" requests from patients, unless the physician-patient relationship has ended. Even after the physician-patient relationship has ended, it would be inappropriate to discuss health-related information on social media.
 - v. The public disclosure or negative information about CMSRU, RowanSOM, or affiliated clinical rotation sites on social media increases the risk of liability to the University and is clearly unprofessional. There are legitimate and confidential mechanisms for improving quality at a medical facility.
 - vi. The specific sanctions to be imposed for non-compliance with HIPAA or FERPA laws and regulations, illegal activities, or violation of University/CMSRU/RowanSOM policies and procedures, will depend upon the severity and legal implications of the activity under review. Action will be initiated as appropriate in accordance with the classification of an individual (i.e., faculty, staff, medical student, resident, house staff, etc.) and, if necessary, the requirements of the individual's licensing boards, as set forth in the applicable disciplinary procedures within the medical schools' student handbooks. Discipline may range from simple counseling/guidance up to the risk of civil and/or criminal liability under applicable federal and state laws and regulations.
 - vii. Non-Compliance and Sanctions
 - 1. Violations of this policy may result in the revocation of social media contact and account privileges.

2. A disciplinary or other review may be initiated if any member of the University community's social media activity violates law or University policy or otherwise subjects the University to potential liability for such acts.
3. The purpose of this section is not intended to provide for the investigation of, or disciplinary action against, members of the University community for the legal exercise of their First Amendment rights.

ATTACHMENT 1 DEFINITIONS

1. *Accessibility* refers to hardware and software technologies that help visually or physically impaired people to use the computer.
2. *CMSRU* means Cooper Medical School of Rowan University.
3. *Confidentiality* is the expectation that only authorized individuals, processes, and systems will have access to the University's information.
4. *Confidential Information* refers to the most sensitive information, which requires the strongest safeguards to reduce the risk of unauthorized access or loss. Unauthorized disclosure or access may: 1) subject University to the risk of liability (for example, for violation of HIPAA and FERPA laws); 2) adversely affect its reputation; and 3) jeopardize its mission. See the Information Classification policy for additional information.
5. *Crisis* refers broadly to any real or perceived emergency, imminent threat, or timely warning which: 1) can negatively impact or seriously endanger members of the University community; 2) requires immediate attention to minimize impact; 3) has significant impact on the operation or reputation of the University; and 4) results in extensive news coverage and public scrutiny. Examples include but are not limited to serious threats to life/property, hostage situations, weather, disease or health threat, natural disaster, assault, and civil unrest.
6. *HIPAA* refers to the Health Insurance Portability and Accountability Act, the federal law passed by Congress in 1996 that requires the protection and confidential handling of Protected Health Information ("PHI").
7. *Faculty Member* means any person hired by the University to conduct classroom or teaching activities or who is otherwise considered by the University to be a full- or part-time or adjunct member of its faculty.
8. *FERPA* refers to the Family Education Rights and Privacy Act, a federal law that protects students' privacy by prohibiting disclosure of students' personally identifiable information ("PII") within their education records, without the student's consent.
9. *Integrity* is the expectation that the University's information will be protected from improper, unauthorized, destructive, or accidental changes.
10. *Medical Schools* means CMSRU and RowanSOM
11. *Medical Student* includes all persons pursuing medical studies at CMSRU or RowanSOM. Medical students who are not officially enrolled for a particular term but who have a continuing relationship with CMSRU or RowanSOM, such as medical students who were previously enrolled, withdraw/take a leave of absence, medical students participating in CMSRU or RowanSOM sponsored academic programs, and medical students who are serving a period of suspension, are considered "medical students."
12. *Member of the University Community* includes any person who is a student, faculty member, organization, alumni, volunteer, trustee, University official, or any other person employed by the University.
13. *Organization* means any number of persons who have complied with the formal requirements for University recognition. This term also applies to persons involved in petitioning for recognition. (Greek Letter Organizations are also subject to the disciplinary procedures outlined in the Greek Handbook.)
14. *Personally Identifiable Information ("PII")* means data or information which includes, but is not limited to: 1) the name of the medical student, the medical student's parent, or other family members; 2) the

address of the medical student or the medical student's family; 3) a personal identifier such as a social security number or student number; or 4) a list of personal characteristics or other information which would make the medical student's identity easily traceable.

15. *Private Information* refers to sensitive information that is restricted to authorized personnel and requires safeguards, but which does not require the same level of safeguards as confidential information protected from disclosure under federal and state laws such as FERPA and HIPAA. Unauthorized disclosure or access may present legal and reputational risks to the University. See the University's Information Classification policy for additional clarification.
16. *Professionalism* is a formal requirement for the education and training of both undergraduate and graduate medical students. CMSRU and RowanSOM expect individuals within the CMSRU and RowanSOM communities to strive to uphold the highest standards and personal behaviors, consistent with a respect for the medical profession, commencing with the first day of medical school. The Accreditation Council for Graduate Medical Education ("ACGME") defines and outlines professionalism as one of the six ACGME Core Competencies as follows: commitment to carrying out professional responsibilities, adherence to ethical principles, and sensitivity to a diverse patient population. "Professionalism is the enactment of the values and ideals of individuals who are called, as physicians, to serve individuals and populations whose care is entrusted to them, prioritizing the interests of those they service above their own." *AAMC Professionalism Task Force*.
17. *Protected Health Information ("PHI")* means information that: 1) is created or received by a health care provider; and 2) relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; or the past, present, or future payment for the provision of health care to an individual; and (i) that identifies the individual; or (ii) with respect to which there is a reasonable basis to believe the information can be used to identify the individual. This guideline applies even if the patient's information has been de-identified, so that the only person who may be able to identify the individual is the patient himself/herself.
18. RowanSOM means Rowan University School of Osteopathic Medicine.
19. *Social Media* refer to any online tools and services that allow Internet users to create and publish content, or any facility for web- and mobile- based publication and commentary, including but not limited to blogs, wikis, RSS feeds, content-sharing services, interactive geo-location platforms and networking sites including but not limited to Facebook, Twitter, YouTube, Instagram, LinkedIn, Snapchat, Pinterest, Google+, Periscope, Flickr, and Wordpress.
20. *Social Media Contact* refers to any member of the University community whose responsibilities include managing and/or maintaining a social media presence on behalf of the University and/or who uses social media to engage in University-affiliated communications.
21. *Social Media Officials* refer to people at the University who delegate responsibilities to Social Media Contacts.
22. *Student* includes all persons enrolled in courses at Rowan University, both full-time and part-time, pursuing undergraduate or graduate studies, and those who live in campus living units. Persons who are not officially enrolled for a particular term but who have a continuing relationship with the University, such as students who were previously enrolled, withdraw/take a leave of absence, persons participating in University sponsored academic programs and students who are serving a period of suspension, are considered "students."
23. *University* means Rowan University and its Medical Schools.
24. *University-affiliated Social Media* refers to any social media presence intended to represent Rowan University in any official or unofficial capacity.
25. *University Official* includes any person employed by Rowan University to perform assigned administrative or professional responsibilities.

1. Department of Public Safety
 - a. [Free Speech](#)
 - b. [General Safety and Security](#)
2. [Graphic Standards](#)
3. Human Resources
 - a. [Statement of Principles](#)
 - b. [Disruptive Behavior and Workplace Violence](#)
4. Information Resources & Technology
 - a. [Acceptable Use](#)
 - b. [Data Governance](#)
 - c. [General User Password](#)
 - d. [Information Classification](#)
 - e. [Information Security](#)
 - f. [Transmission Sensitive Information](#)
 - g. [University Mass Notification Systems](#)
5. Medical Schools
 - a. [Cooper Medical School of Rowan University](#)
 - b. [Rowan University School of Osteopathic Medicine](#)
 - c. The Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), Privacy and Security Rules, 45 CFR Part 160, 45 CFR Part 162 and 45 CFR Part 164
 - d. The Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. 1232g, 34 CFR Part 99
 - e. AMA Policy: Professionalism in the Use of Social Media
 - f. AMA Guidelines for Physicians in Social Media
 - g. Model Guidelines for the Appropriate Use of Social Media and Social Networking in Medical Practice: Adopted as policy by the House of Delegates of the Federation of State Medical Boards
6. [Office of Emergency Management](#)
 - a. [Emergency Preparedness](#)
7. Social Media Sites
 - a. *Facebook* – an online social utility that connects people and organizations with friends and others who work, study, live and engage around them.
 - b. *Flickr* – a photo sharing website on which users can view, upload and share photos.
 - c. *Google+* – integrated social platform that merges with other Google services including YouTube, Gmail and Google Search.
 - d. *Instagram* – a photo- and video-sharing network owned by Facebook that allows users to upload photos taken with a mobile device, apply special filters and share with their friends.
 - e. *LinkedIn* – a business-oriented online social utility that allows users to strengthen and extend their existing network of trusted professional contacts.
 - f. *Periscope* – a streaming service that lets users broadcast and explore the world through live video.
 - g. *Pinterest* – a website that allows users to "pin," or bookmark, content they find interesting from around the web to categorized "boards" on their profiles.
 - h. *Snapchat* – a mobile app that allows users to capture videos and pictures and send messages that self-destruct.
 - i. *Twitter* – a real-time, micro-blogging and social utility service that allows users to send and read messages known as "tweets," which are text-based posts containing no more than 140 characters.
 - j. *Wordpress* – an online, open source content management system, blogging platform, and website creation tool.
 - k. *YouTube* – a video-sharing website that makes it easy to search for and watch online videos.
8. Social Media Terms
 - a. [Facebook](#)
 - b. [Flickr](#)
 - c. [Google+](#)
 - d. [Instagram](#)
 - e. [LinkedIn](#)
 - f. [Periscope](#)
 - g. [Pinterest](#)

- h. [Snapchat](#)
 - i. [Twitter](#)
 - j. [Wordpress](#)
 - k. [YouTube](#)
- 9. [Student Life/Student Affairs](#)
- 10. [Student Code of Conduct](#)
- 11. [Web Content Accessibility Guidelines](#)