AN EMPLOYER TOOLKIT FOR
EMPLOYEE TRAINING AND POLICIES RELATED TO
SOCIAL MEDIA AND CRISIS COMMUNICATIONS
IN HEALTH CARE ORGANIZATIONS

A CREATIVE PROJECT
SUBMITTED TO THE GRADUATE SCHOOL
IN PARTIAL FULFILLMENT OF THE REQUIREMENTS
FOR THE DEGREE MASTER OF ARTS IN PUBLIC RELATIONS
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Chapters

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Rationale

One of the great difficulties of public relations (PR) research is that the tools PR practitioners use to communicate change continuously. A new communications method can arrive on the scene, become part of the mainstream and then be replaced with something newer within a matter of months or years. Social media provides a recent and relevant example. According to a longitudinal analysis that has been conducted by Wright and Hinson every year since 2005, public relations professionals spend more and more time working on social media every year—although this trend appears to be leveling off (Wright & Hinson, 2014). Their research also finds “the influence of traditional mainstream news media continuing to weaken” (p. 1).

As a result of the shift from traditional media to social media, it is important to test whether well-established PR theories still hold true during changing times. Take, for example, Coombs’ Situational Crisis Communications Theory (Coombs, 2007; Coombs & Holladay, 2014). The “SCCT” is an often-used and frequently cited model designed to help organizations determine how to respond during a crisis. However, others have developed new models for the social media age. These models take into account all of the elements of SCCT, as well as who is communicating and how.

Problem Statement

This creative project seeks to determine which elements are commonly included in social media policies, particularly as it pertains to health care organizations, and whether these elements align with research-tested models. Models included relate to internal communications, crisis communications, and social media. As demonstrated in the literature review that follows, these areas are often studied separately; however, they are beginning to converge. In addition, this project will determine whether any of these elements seems to conflict with rulings by the
general counsel of the National Labor Relations Board (NLRB). In recent years, the NLRB has issued guidance from employers on the legality of certain social media policies.

Many times, the areas of internal communications, social media, and crisis communications are studied independently of each other. As demonstrated in the literature review that follows, internal communications theories typically focus on ongoing communications (such as change management and employee engagement) rather than communications related to a specific event such as a crisis. Social media theories rarely encompass specific audiences such as internal communications or specific scenarios such as crisis communications. Quite simply, the current theoretical models fall short of giving organizations a theory-derived, research-tested framework for social media policies related to crisis communications and crisis-related internal communications. The best practices that will arise from this research will address both the risks of employee use of social media, as well as the benefits.

In the modern age, a policy of “say nothing” does not do enough. Social media is the water cooler of the modern workplace. A wise organization will acknowledge this and embrace it. Rather than seeing social media as a liability, they should view it as another tool in their crisis communications planning. However, to do this effectively they need tested policies and training programs that help employees understand their responsibilities and make wise decisions.
Literature Review

This literature review discusses research and models relating to internal communications, crisis communications, and social media, as well as interrelation of these areas. The literature review revealed that very little academic research published in public relations journals to date has covered this junction. Therefore, the following literature review will cover each topic separately and then, when applicable, where they overlap. It should be noted that there is plenty of information and advice about social media policies for employees available via other sources. In particular, these sources include journals related to labor law, risk management, and technology law. In addition, this topic is addressed often in books and magazines aimed at public relations professionals, human resources professionals, and other business leaders. While many of these sources offer thoughtful, seemingly accurate advice, they do not link this advice directly with public relations theory and research.

Social Media

Social media is often described using this definition from the Pew Internet & American Life surveys: “Web-enabled applications that are built around user-generated or user-manipulated content, such as wikis, blogs, podcasts, and social networking sites” (Liu, Jin, & Austin, 2013). Wright and Hinson’s (2014) research examined the growing role of social media in public relations efforts. According to the pair’s longitudinal study, which started in 2005, the most dramatic growth has taken place in three areas: social networks (e.g. Facebook, LinkedIn), microblogging sites (e.g. Twitter) and video sharing (e.g. YouTube). On the other hand, Wright and Hinson suggested that “the percentage of time public relations professionals spend with blogs, social and other emerging media during their workdays is leveling off” (p. 12). The researchers did not speculate as to why the upward trend is slowing. However, they mentioned one other trend that could play a role: the emergence of special departments to handle digital
communications, social media, or both. It is possible these teams are siphoning away work from PR teams. On one hand, this could be considered an ominous trend for PR practitioners. On the other hand, perhaps it allows them to focus on what they do best. Research by Supa (2014) indicates that although social media has opened up a new communication channel, PR practitioners still need to spend a significant amount of time on traditional media relations activities that require a personal approach.

**Crisis Communications**

The word “crisis” is used often, but can be defined in many ways based on the context. Coombs (2007b) defined a crisis as “A sudden and unexpected event that threatens to disrupt an organization’s operations and poses both a financial and a reputational threat” (p. 164). Crisis communications plays a role in public relations because, as Coombs stated, “Crises threaten to damage reputations because a crisis gives people reasons to think badly of the organization” (p. 164). Crisis communications, by extension, relates to messages before, during and after such a crisis. Schultz, Utz, and Göritz (2011) described crisis communications as a field that “mainly deals with the interrelationships between crisis situations, communication strategies and crisis perceptions” (p. 20).

Many theory-based crisis communications models adhere to the framework of Coombs’ Situational Crisis Communications Theory (Coombs, 2007; Coombs & Holladay, 2014). The original SCCT model developed in 2007 prescribed how to respond to a crisis based on two factors: the type of crisis (natural disaster, organizational misdeed, etc.) and modifiers related to the level of responsibility the organization has for the crisis. A third factor is the severity of the crisis. Over time, the model has been clarified and modified in response to changes in the public relations environment, including the growth of social media. For example, in recent writings about the SCCT model, Coombs and Holladay (2014) observed that certain strategies may work
better than others based on the spaces where publics express and hear ideas about the crisis. They called these spaces “sub-arenas” and noted that, “It is very possible that crisis communication messages can be effective in one sub-arena while ineffective in another. The variation across the sub-arenas is a function of how the sub-arenas can be populated by distinctly different people. Simply analyzing aggregated data of public online comments will miss important nuances in how crisis publics are reacting to the crisis communication efforts.” (p. 41). This evolution reflects a common criticism of the SCCT model: a presumption that the message should be the same regardless of the medium used to transmit it – which means a tweet or blog post carries the same weight as a media report. As noted by Liu, Jin, and Austin (2011), “SCCT does not distinguish the effect of media type on publics’ acceptance of crisis response strategies, instead stating that the effect of media type is minimal” (p. 53).

Coombs and Holladay also pointed out another weakness in early SCCT research: a “strong sender orientation,” which minimizes the role of the message recipient. Claeys, Cauberghe, and Vyncke (2010) made a similar point, noting that the SCCT model does not account for differences in personality among people who send and receive crisis-related messages. They focused on SCCT in relation to a personality trait known as locus of control, which Fournier (2009) defined as “the extent to which people believe they have power over events in their lives” (para. 1). Following their research on SCCT, Claeys et al. found “no significant difference in reputational perceptions between the accidental crisis and the victim crisis” (p. 261). One possible reason, they suggested, is that a person’s locus of control – not just the crisis type – impacts the way they perceive a message.

**Internal communications**

The term internal communications refers to a subset of public relations that generally focuses on messages and activities directed at employees. Similar terms include internal
corporate communications, employee communications, and organizational communications. Welch (2012) defined this discipline as “communication between strategic managers and internal stakeholders designed to promote commitment and a sense of belonging to the organisation, to develop awareness of its changing environment, and understanding of its evolving aims” (p. 247). Much of the research in internal communications focuses on channels used to communicate and frequency of messages. However, Ruck and Welch (2012) noted that this approach does not give enough weight to what employees want and need to know. They have called for “an emphasis on communities, content and dialogue rather than volume and channels” (p. 301).

**Crisis communications and social media**

Emerging research has begun to extend the SCCT to include social media and other user-generated content in addition to traditional media. A commonly cited theoretical model is the Social-mediated Crisis Communication Model (SMCC) presented by Jin and Liu (2010). This model builds on SCCT but makes it more relevant by incorporating use of social media by key publics. In particular, the SMCC considers these factors: (1) audience motivations for using social media to communicate about a crisis: issue relevance, information seeking/sharing, and emotional venting/support, (2) organizational crisis response strategies and (3) interplay of crisis information form and source. According to research by Liu, Austin and Jin (2011), the SMCC demonstrates that when it comes to crisis communications, audiences who use social media truly do consider the source. They also consider the channel.
Schultz et al. (2011) developed a similar model to illustrate the interaction between strategy, message and medium. They tested the model by conducting research on whether message recipients reacted differently based on the source of a message – traditional newspaper, blog, or Twitter. The result: “The medium turned out to be more important than the message … Organizations should therefore pay more attention to Twitter, and strategically reflect on their media choice and the target groups’ media use” (p. 26).
Both models and their supporting research indicate that an appropriate crisis communications strategy and message must reflect not only *what* happened and *why* it happened (type of crisis and level of organizational responsibility – the two main tenets of SCCT), but *how* the organization will communicate (which people and which channels – the main tenets of SMMC and the Schultz model.) However, other research seems to contradict these models. Oyer (2010) created a fictional scenario of an automobile recall and found that the medium – an online video versus a blog versus a news report – had a minimal impact on message recipients’ trust in the fictional company conducting the recall (Oyer, 2010). In a similar fashion, Freberg (2012) created a fictional scenario of a food-safety related crisis communication message, testing the mediums used as well as whether the recipients were more likely to act on an “official” message from an organizational spokesperson versus a “user-generated” message from an unofficial source. Freberg found that the source and channel had no impact. In fact, she noted that “participants using social media responded with the same intent to comply with messages from organizational and user-generated sources” (p. 419). With both the Oyer research and the
Freberg research, the results seem to negate concerns that messages delivered via social media would be perceived as less credible or less actionable. Freberg also pointed to the key role that unofficial sources play in message dissemination. As she noted, the results “sound a cautionary note to professionals developing crisis management plans. The possibility that unconfirmed information will carry the same weight as official, confirmed information leaves organizations quite vulnerable to rumor and misunderstanding.” (p. 421). Because these unofficial sources may include internal stakeholders, it is crucial to explore the link between crisis communications and internal communications.

One message is consistent in all of the research. As stated by Jin, Liu, and Austin (2011), “organizations no longer have a choice about whether to integrate social media into crisis management; the only choice is how to do so” (p. 76). In a similar vein, DeStasio, McCorkindale, and Wright (2011), who surveyed high-ranking executives about social media, stated that “to communicate effectively, organizations must go to where their stakeholders are” (p. 326) – which is social media. However, they found that companies are hesitant to do so for three reasons: 1) The lack of control over what people will say or do on social media, 2) skepticism about the value of social media, and 3) thinking that employees would not understand how to “use the tools or incorporate them strategically” (p. 326). Again, this points to the need to explore the link between crisis communications and internal communications.

Crisis communications and internal communications

The intersection between crisis communications and internal communications is a growing field of public relations research. However, this was not always the case. Johansen, Aggerholm, and Frandsen (2012) reviewed the literature and found that “when internal crisis management and crisis communication are finally thematized, only very short chapters or sections of a book or a journal article are devoted to the topic” (p. 272). For example, they point
out that other than a section about communicating with internal publics in Fearn-Banks’ excellence theory of crisis public relations, which was published in 1996, theory-based research on internal crisis communications is “not only very few, they are also often only accessible in other languages than English” (p. 272). Therefore, they set out to explore this area in depth. Johansen et al. found that private organizations are most likely to use joint meetings (89%), special meetings (87%), the company intranet (85%) and email (78%) for internal communications related to crises. They are least likely to use internal blogs (9%) and internal social media (5%). However, applicability of this research is limited because the researchers surveyed a limited group: companies and organizations in Denmark.

In the United States, Wigley and Zhang (2011) surveyed 251 Public Relations Society of America (PRSA) members about social media and crisis planning. While they did not collect information about specific message channels such as email versus meetings, they did find evidence of the growing role of social media in crisis communications. Of those surveyed, 48% have included social media in their crisis plans. They also reported that they are more likely to communicate with stakeholders via social media (82%) than the news media (61%). This contradicts the findings of Wright and Hinson, who reported a much lower number using social media in their longitudinal surveys. It also reflects a massive shift in the way PR practitioners work. Wigley and Zhang observed that “the gatekeeping function of media has all but disappeared” (p. 3).

**Social media and internal communications**

Several authors have noted the lack of theory-based research on social media and internal communications – particularly when it comes to social media policies and governance. As Vaast and Kaganer (2013) noted, “How organizations actually perceive and respond to employee use of social media … has received scarce attention. In particular, we still know little about the
governance mechanisms that organizations deploy to regulate employee use of social media.” (p. 81). While research in this area may be sparse, information about it is not. For example, a website operated by Chris Boudreaux (http://socialmediagovernance.com/) contains a public database of more than 200 policies from for-profit companies, nonprofit organizations, educational institutions, and governmental entities in the United States and abroad. These policies range from one-page guidelines to in-depth handbooks. However, the companies and organizations on that site seem to be in the minority. According to research done by Liu, Austin and Yan (2011), the majority of companies – more than 70 percent in 2009 – have no social media policies at all.

Beyond the issue of whether a company has social media policies, there is the issue of why they have policies and what these policies include. For example, companies that have social media policies may be more concerned with the human resources angle than the public relations angle. This is especially the case after a recent ruling by the U.S. Labor Relations Board concerning an employer’s rights to monitor and censor work-related posts on social media. However, Myers (2014) analysis of this ruling acknowledged the public relations implications of social media:

Evaluating social media comments of corporate employees is clearly important for a corporation or businesses’ online image. Image management within public relations oftentimes evaluates online presence and social media discussions of the company’s products or services… Compounding this problem is that as social media evolves beyond Facebook to other more open platforms, such as Twitter, these inter-office grievances can reflect poorly on a corporation’s image. Since public relations practitioners are often times the resident expert in social media
communications, it may fall to them to evaluate these online employee discussions. (p. 554)

Vaast and Kaganer (2013) evaluated publicly available policies available from the online database noted above and found that companies appeared to be concerned about two issues in particular: visibility (e.g. “post as if everyone you know reads or hears every word”) and persistence (e.g. “remember that what you post may live for many years in the Web, even after you delete your copy of it”). The authors suggested that companies home in on these areas because they present “significant sources of risk” (p. 88). In addition, some of the literature suggests that companies do a disservice to employees by sending mixed messages. As Vaast and Kaganer (2013) pointed out, “Organizations, on their part, might seek to encourage certain uses of social media and limit others” (p. 79). The inference is that some companies do not make it clear about when it is okay to post about work and when it is not okay.

Aside from whether policies exist or not, there is the question of whether these policies are needed. To understand this, we need to understand the answer two larger questions: “why do people communicate during a crisis?” and “why do employees communicate about their work or their workplace using social media?” Research by Liu, Jin, and Austin (2013) answered the first question clearly. They found that “Having or seeking information seemed to be the primary motivator for communicating about crises” (p. 59). Research on the second question points to three reasons for communication. According to the initial findings from research in Europe by van Zoonen, van der Meer and Verhoeven (2014), the primary reason employees communicate about work on social media is information dissemination,. In their words, social media is useful in “facilitating employees’ sense making about work-related topics” (p. 851). The next reason is relationship management; social media “provides employees and their organizations with new ways of keeping in touch and building relationships with colleagues and other stakeholders” (p.
The third reason is organizational ambassadorship. This suggests that “employees are aware of their potential impact on the corporate reputation” (p. 852). This research supports a persona-based approach to social media and crisis communications policies – an approach that helps employees understand why they choose to communicate, what they tend to communicate, and how these behaviors may be risky or beneficial.

Social media and internal communications and crisis communications

Research on the intersection between social media, internal communications and crisis communications is sparse. According to research conducted in Denmark by van Zoonen et al. (2014), companies acknowledge that 16 percent of employees have communicated using social media accounts such as Facebook during a crisis. While that number may seem low, when extrapolated to a larger population that means hundreds of thousands of loose lips. In addition, the study’s authors reported a high number of “I don’t know” responses to this question. Based on these numbers, employers can assume that the risks associated with employee use of social media are large, but the true extent of the potential problem is unknown.

Summary

The literature review reveals that in recent years, there has been an increase in the research related to social media, especially as it pertains to internal communications and crisis communications. However, few have tackled the tricky intersection of all three areas – how to communicate to employees about what to do (and what not to do) on social media when the company or organization is facing a crisis. In addition, there have been several attempts in recent years adapt the established models for crisis communication to an age of social media – for example, be adding another element to the SCCT to make the SMCC. Finally, researchers are looking in to why employees tend to seek information and share information about their workplace, whether they do so in person or online. What is missing is a model that incorporates
all the elements into a singular crisis communication model that includes employee use of social media: the type of crisis, severity of crisis, and level of responsibility (Coombs, 2007), the source of the message (Jin & Liu, 2010; Schultz et al., 2011), and the reason why an employee wants to seek or share information (van Zoonen et al., 2014). An ideal social media policy should combine all three.
Methodology

This project included two phases: a study of social media policies using content analysis, followed by development of an employer toolkit for health care organizations. Content analysis is “the systematic and replicable examination of symbols of communication, which have been assigned numerical values according to valid measurement rules, and the analysis of relationship involving those values using statistical methods, in order to describe the communication, draw inferences about its meaning, or infer from the communication to its context, both of production and consumption” (Riffe, Lacy, & Fico, 1998, p. 20). Content analysis was used to determine which elements are most common in the social media policies currently in place for health care organizations. Content analysis was also used to determine whether the policies evaluated generally adhere to key principles of SCCT and SMMC, as well as guidance on social media policies issued by the National Labor Relations Board (NLRB).

The output of this project is an internal communications toolkit for employers that includes a template social media policy for health care organizations and a corresponding training module. In addition, the toolkit includes template communications to support the training program and policy: emails to promote participation in the quiz and training and an interactive online quiz that helps employees understand their personal behavior in terms of social media and crisis communications. Inclusion of a quiz is designed to address a key flaw in most social media policies: a blanket approach that presents the same policies to everyone in spite of their individual differences in communication style and social media use. As noted in the literature review, employees have different motivations for seeking and sharing information about their workplace.
For the study, the researcher performed a content analysis on social media policies from health care industry. Content analysis is used in several areas of research. In particular, Wilson (2011) noted that “Content analysis is a method commonly used in the social sciences” (p. 178). Content analysis has been defined by Calhoun (2002) as “A group of formal and, especially, statistical techniques used to analyze texts” (para. 1). Steps involved in the content analysis process include developing a research question or hypothesis, defining a population, selecting a research design, gathering data, and interpreting the evidence. Following is a detailed exploration of the methodology used for each step in the content analysis process for this study.

**Research questions**

At the outset of the project, the researcher developed three research questions. These questions were designed to identify not just the common elements of health care organization social media policies, but the elements that would be considered “best practices” to follow. The emphasis on best practices, rather than common elements, was intentional. A common element would not be a best practice if it is not supported by communications theories. Likewise, a common element would not be a best practice if it may violate current laws in the United States. Therefore, the following research questions were used:

**RQ1:** What are the most common elements of social media policies for healthcare organizations?

**RQ2:** Of the policies catalogued for RQ1, do they generally adhere to the key principles of SCCT and SMMC, two leading theories on social media and crisis communications?

**RQ3:** Of the policies catalogued for RQ1, do they generally follow guidance on social media policies issued by the general counsel of the National Labor Relations Board (NLRB)?
Defining the population

The population selected for this study was health care organizations. These entities face the same challenges other public and private organizations face when it comes to social media and crisis communications, but they also face regulatory restraints and privacy laws such as the federal Health Insurance Portability and Accountability Act of 1996 (HIPAA). The policies analyzed for this project represent a purposive convenience sample of documents obtained directly from health care organizations through their public website or via personal requests by the researcher. This means of acquisition was used to ensure only current policies would be evaluated. Personal requests were sent via email, Facebook, and LinkedIn. Contacts were asked to share their organization’s current social media policy for all employees – not policies specific to those who are responsible for managing the organization’s social media accounts. Because internal policies may be considered confidential company information, the researcher assured all people contacted that the document would not be shared with anyone other than coders for the study, and that the organization name and source of the policy would not be disclosed.

The researcher secured policies from 10 different organizations. This was the number needed in order to have at least one document representing each of the following types of organizations: community hospital, regional health care system, teaching hospital, health insurance, devices/diagnostics manufacturing, and pharmaceutical manufacturing. In addition to including both nonprofit and for-profit entities, these selections were intended to cover a range of employee roles, from doctors and nurses who work directly with patients to accountants who never see protected health information (PHI). Also, these selections were intended to cover companies that do and not interact with labor unions. Labor unions are an important consideration because employers need to be cautious not to implement social media policies that restrict (or appear to restrict) employees’ rights to organize.
Table 1

Social Media Policies Included in Content Analysis

<table>
<thead>
<tr>
<th>Policy # For Coding</th>
<th>Type of Organization</th>
<th>Location</th>
<th>Number of Employees</th>
<th>Policy Date</th>
<th>Acquisition Method</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Hospital system</td>
<td>North Carolina</td>
<td>60,000</td>
<td>Not dated – downloaded June 2015</td>
<td>Downloaded from public website</td>
</tr>
<tr>
<td>2</td>
<td>Community hospital</td>
<td>Ohio</td>
<td>5,000</td>
<td>April 2010</td>
<td>Direct from employee</td>
</tr>
<tr>
<td>3</td>
<td>Insurance company</td>
<td>USA Nationwide</td>
<td>52,000</td>
<td>April 2013</td>
<td>Direct from employee</td>
</tr>
<tr>
<td>4</td>
<td>Pharmaceutical company</td>
<td>Global</td>
<td>37,000</td>
<td>April 2015</td>
<td>Direct from employee</td>
</tr>
<tr>
<td>5</td>
<td>Hospital system</td>
<td>Minnesota</td>
<td>55,000</td>
<td>Not dated – downloaded May 2015</td>
<td>Downloaded from public website</td>
</tr>
<tr>
<td>6</td>
<td>Hospital system</td>
<td>Indiana</td>
<td>23,000</td>
<td>Sept 2012</td>
<td>Direct from employee</td>
</tr>
<tr>
<td>7</td>
<td>Devices/diagnostics company</td>
<td>Global</td>
<td>88,000</td>
<td>June 2013</td>
<td>Downloaded from public website</td>
</tr>
<tr>
<td>8</td>
<td>Hospital system</td>
<td>California</td>
<td>48,000</td>
<td>Sept 2011</td>
<td>Downloaded from public website</td>
</tr>
<tr>
<td>9</td>
<td>Community hospital</td>
<td>Indiana</td>
<td>650</td>
<td>Jan 2014</td>
<td>Direct from employee</td>
</tr>
<tr>
<td>10</td>
<td>University teaching hospital</td>
<td>Pennsylvania</td>
<td>4,300</td>
<td>Oct 2013</td>
<td>Downloaded from public website</td>
</tr>
</tbody>
</table>
By looking at diverse organizations, the researcher was able to determine commonalities for all health care organizations and employees, as well as unique issues to include in the template for certain types of organizations or roles. For example, a pharmaceutical company included helpful guidance for sales representatives who are traveling on business; while the specific guidance for sales representatives may not apply to employees at a nonprofit hospital, the reason behind the guidance does: saying where you are could reveal company confidential information.

Research design

Each policy was evaluated by two coders independently. Two coders were used to determine interrater reliability using percent agreement, Scott’s Pi, Cohen’s Kappa, and Krippendorff’s Alpha. Both coders were responsible for 100 percent of the coding. The first coder was the researcher, a marketing a public relations professional with about 10 years of experience in social media. The second coder was a PR professional with more than 20 years of experience in the industry, including hands-on involvement developing crisis communications plans and social media policies. Policies were evaluated as is, with no attempt to anonymize the organization. The coding sheet contained 76 questions for which the possible answers were Yes, No, and Unable to Determine. Notes fields were provided to capture additional documentation from the coders, such as a unique or exceptional element of a policy, but these notes were not used in the content analysis. To determine which questions should be included on the coding sheet, the researcher referenced peer-reviewed journal articles and theory-based research pertaining to social media, internal communications, and crisis communications, as well as articles about crafting social media policies that were published in trade publications for human resources, information technology, and communications professionals. The researcher also reviewed health care organization policies posted on the Social Media Policy Database at
To train the coders, both were provided with a code book including detailed instructions on how to read, interpret, and code the policies. Both the coding sheet and code book are included in the Appendix.

The questions on the coding sheet were organized into groups. The first group of questions related to terminology used to describe the role or purpose of the document. For example, coders were asked to note whether the document was called a “policy” or an “agreement” or a “recommendation.” The next set of questions related to definitions included in the document. As specified in the code book, coders noted whether the policies contained definitions for terms such as “protected health information (PHI)” and “harassment” either in the body of the document or a separate definitions section. Moving on to the next set of questions, coders noted which specific social media channels were mentioned in the policy. Options included 10 commonly used communication channels such as blogs, email, Facebook, and Twitter, as well as an “other” category. The next set of questions covered monitoring of social media content. Each policy was evaluated to determine whether it mentions monitoring of employees’ use of social media and, if so, describes when and how employees are monitored.

The following section contained more than a dozen questions about specific activities that may be discouraged or banned outright in the policy. For example, coders were asked to determine whether the policy restricted use of social media during working hours and on computers/devices owned or managed by the employer. The next section contained two questions about reporting. Coders noted whether the policies included instructions on how to report potential violations and whether policies included any language about consequences for failing to report violations. In the following section, coders noted whether the policies included language about potential consequences for violating the policy, ranging from removal of the
content up to termination and legal action. The next section asked coders to note whether any examples were used in the document. In the code book, examples were defined as “scenarios intended to help readers understand the policy.” Possible examples included sharing protected health information, sharing confidential/proprietary information, and knowingly friending or following a patient or customer on social media. The next section asked coders to note whether the policies contained other commonly used or recommended language, such as a warning that social media posts “live forever.”

All of the above items were designed to answer RQ1 pertaining to common elements of social media policies in health care organizations. The final two questions on the coding sheet were designed to answer RQ2 and RQ3. For RQ2, coders noted whether any language in the document conflicted with two key principles of the SCCT and/or SMMC models: (1) The organization communicates directly with social media followers and creators and (2) Publics access content through social media as well as traditional media. For RQ3, coders noted whether any language in the document conflicted with the National Labor Relations Board (NLRB) May 2012 Report of the Acting General Counsel Concerning Social Media Cases. This guidance seeks to clarify which employee communications (including social media communications) are protected based on labor-organizing protections. In particular, the report says employers should not:

- Prohibit employees from discussing and disclosing information regarding their own conditions of employment
- Prohibit employees from discussing and disclosing information about the conditions of employment of employees other than themselves
- Threaten employees with discharge or criminal prosecution for failing to report unauthorized access to or misuse of confidential information
• Prohibit non-commercial use of the Employer’s logo or trademarks
• Advise employees to think carefully about “ friending” co-workers
• Advise employees to report “any unusual or inappropriate internal social media activity”

Development of Employer Toolkit

The output of this creative project is an employer toolkit. This toolkit contains four items that companies and organizations can use for internal communications related to social media and crisis communications:

1. Social media policy template: This template includes the most common policies and procedures that were identified in the content analysis, as well as any items that emerged as best practices during the content analysis. The best practices include certain language, such as restrictions and definitions, as well as overall tone and organization of the document.

2. Training module: This module is a virtual training program that aligns with the policy template and also presents a separate section with information only applicable to managers. The training module uses scenarios to clearly describe how employees may use social media and how they should not, particularly in a crisis.

3. Interactive quiz: A fun, brief online survey in which employees will answer questions about their workplace communication style and social media use. Similar to the quizzes that many people take and share on Facebook, this quiz will help employees understand how and why they communicate about work matters internally and externally. Questions will reflect the different communication styles and motivations identified by van Zoonen et al (2014):

   a. A person who talks about work issues because they like to be a source of information.
b. A person who talks about work issues because they think it helps build relationships.

c. A person who talks about work issues because they want to be seen as a representative of the company.

4. Internal communications templates: Template emails that encourage employees to take the quiz, participate in the training module, and adhere to the policies and procedures in the guide.
Results

Results of Content Analysis

Both coders evaluated all 10 policies using the same 76 Yes/No/Unable to Determine questions. Across all questions for all policies coded, percent agreement between coders was 60 percent. According to Neuendorf (2002), “Coefficients of .90 or greater are nearly always acceptable, .80 or greater is acceptable in most situations, and .70 may be appropriate in some exploratory studies for some indices” (p. 145). Therefore, the interrater reliability for the coding sheet would not be considered acceptable. Three other formulas were used to determine interrater reliability. Overall Scott’s Pi was 0.210285. Cohen's Kappa was 0.254936. Krippendorff's Alpha was 0.210805. It should be noted that interrater reliability varied significantly among the sections of the coding sheet, from 30 percent agreement up to 100 percent agreement, as shown in the following table.
Table 2

*Interrater reliability*

<table>
<thead>
<tr>
<th>Section</th>
<th>Percent Agreement</th>
<th>Scott's Pi</th>
<th>Cohen's Kappa</th>
<th>Krippendorff's Alpha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Terminology</td>
<td>76.66</td>
<td>0.431857</td>
<td>0.460501</td>
<td>0.436591</td>
</tr>
<tr>
<td>Definitions</td>
<td>40.00</td>
<td>-0.10744</td>
<td>0.111517</td>
<td>-0.10129</td>
</tr>
<tr>
<td>Scope</td>
<td>73.33</td>
<td>0.444444</td>
<td>0.448434</td>
<td>0.446759</td>
</tr>
<tr>
<td>Monitoring</td>
<td>76.66</td>
<td>0.42623</td>
<td>0.429348</td>
<td>0.435792</td>
</tr>
<tr>
<td>Restricted activities</td>
<td>48.75</td>
<td>-0.01701</td>
<td>0.147443</td>
<td>-0.01384</td>
</tr>
<tr>
<td>Reporting</td>
<td>65.00</td>
<td>0.122257</td>
<td>0.23913</td>
<td>0.144201</td>
</tr>
<tr>
<td>Consequences</td>
<td>35.71</td>
<td>-0.05758</td>
<td>0.117647</td>
<td>-0.05003</td>
</tr>
<tr>
<td>Examples</td>
<td>85.00</td>
<td>0.201915</td>
<td>0.236253</td>
<td>0.205906</td>
</tr>
<tr>
<td>Other content</td>
<td>60.00</td>
<td>0.199901</td>
<td>0.287286</td>
<td>0.204346</td>
</tr>
<tr>
<td>Conflict with theories</td>
<td>100.00</td>
<td>undefined*</td>
<td>undefined*</td>
<td>undefined*</td>
</tr>
<tr>
<td>Conflict with NLRB</td>
<td>30.00</td>
<td>-0.53846</td>
<td>0</td>
<td>-0.46154</td>
</tr>
<tr>
<td>Overall</td>
<td>60.66</td>
<td>0.210285</td>
<td>0.254936</td>
<td>0.210805</td>
</tr>
</tbody>
</table>

*Scott's Pi, Cohen's Kappa, and Krippendorff's Alpha are undefined due to invariant values.*

In many ways, the lack of interrater reliability reflects the personal characteristics of the coders. Even though detailed instructions were provided in the coding sheet, the two coders often interpreted the language in the policies differently. For example, coder 2 used a broader interpretation to note restricted activities and potential consequences for violating the policies, resulting in more Yes votes for these areas. Coder 1 was more literal in interpreting these sections. Coder 1 was strict in interpreting the NLRB guidelines, while coder 1 was not. On the other hand, personal characteristics were not the only factor at play. Lack of interrater reliability also points to a key issue with the policies evaluated – that the language they contain is truly vague and confusing. More analysis of this subject follows in the discussion section. Because interrater reliability was low, the data presented on the following pages reflects the results of both coding sheets.
As noted above, the first section of the coding sheet captured data for informational purposes only; these responses were not included in the content analysis. This section asked for the organization name and the date of the policy, as well as the coder’s initial and date coded. The yes/no questions started with the next section of the coding sheet, which asked about the terminology used to describe the role or purpose of the document. As noted in the code book, “this terminology is often in the title of the document; however, other terms may be used in the body of the document.” Among all of the documents, the most used term was “policy,” which was used to describe seven out of the 10 documents. The terms “agreement,” “procedure,” “guideline,” and “recommendation” were used less frequently. Coders noted that other terms used included “principles,” “responsibilities,” and “requirements for participation.”
Table 3

Terminology used to describe the document

<table>
<thead>
<tr>
<th>Term</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes Responses</td>
<td>Yes Responses</td>
</tr>
<tr>
<td>Agreement</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Policy</td>
<td>7</td>
<td>7</td>
</tr>
<tr>
<td>Procedure</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Guideline</td>
<td>8</td>
<td>2</td>
</tr>
<tr>
<td>Recommendation</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Other</td>
<td>4</td>
<td>1</td>
</tr>
</tbody>
</table>

The next section of the coding sheet covered definitions in the document or in a separate document linked to from or named in the policy. Coders were asked to look for definitions in separate glossary/definitions section or within the body of the document prefaced with language such as “[term] is…” It should be noted that coder 2 interpreted this rule more broadly than coder 1. Both coders agreed that “social media” was the term defined most often. Few of the documents defined obscene, offensive, slurs, discriminatory content, or harassment, even though this type of content or activity is specifically restricted in some of the documents; however, some referenced general employee policies where these terms may be defined. None of the documents defined what the organization considers “working hours.”
Table 4

*Definitions provided in the document or in another referenced document*

<table>
<thead>
<tr>
<th>Definition</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes Responses</td>
<td>Yes Responses</td>
</tr>
<tr>
<td>Social media</td>
<td>6</td>
<td>8</td>
</tr>
<tr>
<td>Working hours</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Protected health information (PHI)</td>
<td>3</td>
<td>10</td>
</tr>
<tr>
<td>Confidential or proprietary information</td>
<td>3</td>
<td>10</td>
</tr>
<tr>
<td>Crisis</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Obscene or offensive content</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Slurs or discriminatory content</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Harassment</td>
<td>0</td>
<td>8</td>
</tr>
<tr>
<td>Other</td>
<td>3</td>
<td>2</td>
</tr>
</tbody>
</table>

The next section of the coding sheet covered the specific social media channels listed in the document. Not surprisingly, since most of the documents defined social media, nearly all of them listed specific social media channels that were considered in scope for the policy. The most commonly referenced channels were blogs and Facebook accounts, both of which were mentioned in more than half of the documents. Other channels such as LinkedIn, Twitter and YouTube were mentioned in about one-third of the policies. Less common items included email, internal social media networks and instant messaging. Two the documents specifically mentioned Instagram, and it is worth noting that both of those organizations are associated with universities. None mentioned Snapchat. Several of the documents included channels not included
on the coding sheet; other channels listed at least once included wikis, podcasts, discussion forums, Flickr, Foursquare, Tumblr, chat rooms, and personal websites.
Table 5

*Specific social media channels listed in the document*

<table>
<thead>
<tr>
<th>Channel</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blogs</td>
<td>8</td>
<td>9</td>
</tr>
<tr>
<td>Email</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>Instant messaging</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Internal social networks</td>
<td>3</td>
<td>10</td>
</tr>
<tr>
<td>Facebook</td>
<td>7</td>
<td>6</td>
</tr>
<tr>
<td>Instagram</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>LinkedIn</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>MySpace</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Snapchat</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Twitter</td>
<td>3</td>
<td>4</td>
</tr>
<tr>
<td>YouTube</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Other</td>
<td>7</td>
<td>2</td>
</tr>
</tbody>
</table>

The next section of the coding sheet asked about monitoring of employees’ social media use. About half of the documents mentioned that employees’ use of social media may be monitored. However, only one of the documents specified how the monitoring takes place (for example: a manual check only if a potential violation is reported versus an automated monitoring system). This organization, an Indiana-based community hospital, included the following language in its policy: “The hospital reserves the right to use software and internet search tools to
monitor comments or discussions about hospital representatives, patients, associates and other hospital related matters that associates (and non-associates) post anywhere on the internet, including social media sites.”

Only one of the documents mentioned that prospective employees’ social media accounts may be checked before they are hired. This organization, a California-based hospital system, included an entire section on use of information in the hiring process in its policy. Specifically, they warned that “Managers engaged in hiring are prohibited from conducting social media background checks on their own. Instead, any such checks will be done by the designated HR/Recruitment professional following the network’s hiring policies and procedures.” The policy also noted that social media should only be checked if a person has been selected for interview, so that the organization “limits the risk of obtaining equal employment-opportunity related information about the candidate too early in the process.” One item that this policy could address more clearly is LinkedIn, which is a social networking site where many people post their resumes and network for jobs. The following language may have been included in order to address LinkedIn, but it does little to clarify the rules: “Use of social or professional networking sites to recruit candidates will be done in conjunction with a variety of other recruitment methods that encompass a broad range of sources.”
Table 6

*Language about monitoring in the document*

<table>
<thead>
<tr>
<th>Language</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mentions that social media accounts may be checked before hire</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Mentions that social media usage may be monitored</td>
<td>5</td>
<td>6</td>
</tr>
<tr>
<td>Describes how social usage is monitored</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

The next section of the coding sheet asked about specific activities that the organization either restricts outright or advises against. As mentioned previously, the two coders varied significantly in how they interpreted the policies; percent agreement was just under 50 percent. Therefore, the following data should be considered informational only; while it is interesting to see the range of different rules, this is by no means an accurate snapshot of the policies health care organizations typically have in place. By far the most common restricted activities were sharing information about the organization’s business or financial matters and sharing protected health information (PHI) – two areas that pose a great risk for the organization. About half restricted posting about patients or customers in general, regardless of whether the post contains PHI – for example, by posting a comment that doesn’t identify the patient by name. Few of the policies specifically banned photos or videos taken at work; however, some addressed the risk of sharing PHI or confidential information through photos. None of the documents restricted employees from listing their employer on their social media page.
### Table 7

**Restricted activities**

<table>
<thead>
<tr>
<th></th>
<th>Language</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Yes Responses</td>
<td>Yes Responses</td>
</tr>
<tr>
<td>Restricts or discourages employee use of social media outside of work hours</td>
<td>1</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Restricts or discourages employee use of social media during working hours</td>
<td>4</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Restricts or discourages employee use of social media on company-owned systems</td>
<td>2</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Restricts or discourages employees from listing their employer on social media accounts</td>
<td>0</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mentions that employees should not post “obscene” or “offensive” content</td>
<td>3</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mentions that employees should not post “slurs” or “discriminatory” content</td>
<td>5</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mentions that employees should not post “harassing” content</td>
<td>5</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Mentions that employees should not share protected health information (PHI) on social media</td>
<td>7</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Mentions that employees should not post photos taken at the workplace</td>
<td>2</td>
<td>3</td>
<td></td>
</tr>
</tbody>
</table>
Table 8

*Restricted activities, continued*

<table>
<thead>
<tr>
<th>Language</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mentions that employees should not post videos taken at the workplace</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Mentions that employees should not talk about the company/organization’s business or financial matters on social media</td>
<td>9</td>
<td>10</td>
</tr>
<tr>
<td>Mentions that employees should not talk about the company/organization’s competitors on social media</td>
<td>2</td>
<td>6</td>
</tr>
<tr>
<td>Mentions that employees should not talk about supervisors or other employees on social media</td>
<td>1</td>
<td>9</td>
</tr>
<tr>
<td>Mentions that employees should not talk about patients/customers on social media</td>
<td>6</td>
<td>10</td>
</tr>
<tr>
<td>Mentions that employees should not knowingly follow/friend patients/customers on social media</td>
<td>0</td>
<td>6</td>
</tr>
<tr>
<td>Other</td>
<td>5</td>
<td>1</td>
</tr>
</tbody>
</table>

The next section of the coding sheet asked about reporting possible violations of the document. Asked to note whether the document included “any language about how to report known or suspected violations of the policy,” coder 1 found this language in two of the policies, while coder 2 found this language in almost all of them; the difference must be attributed to lack
of clarity in the code book – for instance, one coder may have been looking for a specific call to action while the other considered contact information good enough. It may also be due to a lack of clarity in the policies themselves – for instance, many of them told employees to report false or potentially damaging information posted about the company on social media, which may or may not be information posted by an employees. None of the policies said an employee may face consequences for failing to report known violations of the social media policy. In fact, they were more likely to include nonretaliation language, saying that employees would not be punished for reporting potential violations.
Table 9

**Reporting of violations**

<table>
<thead>
<tr>
<th>Language</th>
<th>Coder 1 Yes Responses</th>
<th>Coder 2 Yes Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Says how to report potential violations</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>Says there are consequences for failing to report known violations</td>
<td>0</td>
<td>1</td>
</tr>
</tbody>
</table>

The next section of the coding sheet covered potential consequences for violating the rules in the policy. In the code book, coders were instructed to search for any language including the term “consequence” or a synonym such as “repercussion,” in case it uses a synonym. Interrater reliability for this section was low due to a high number of Unable to Determine responses from one coder. However, the coders generally agreed on the specific items mentioned most frequently: termination and legal action.
Table 10

*Potential consequences for violations*

<table>
<thead>
<tr>
<th>Potential consequence</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes Responses</td>
<td>Yes Responses</td>
</tr>
<tr>
<td>Remove post</td>
<td>2</td>
<td>4</td>
</tr>
<tr>
<td>Shut down account</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Demotion</td>
<td>0</td>
<td>4</td>
</tr>
<tr>
<td>Suspension</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Termination</td>
<td>3</td>
<td>5</td>
</tr>
<tr>
<td>Legal action</td>
<td>4</td>
<td>3</td>
</tr>
<tr>
<td>Other</td>
<td>3</td>
<td>0</td>
</tr>
</tbody>
</table>

The next section of the coding sheet covered examples provided in the document. Examples were described in the code book as “scenarios intended to help readers understand the policy.” In general, the documents lacked examples. Several had no examples at all. Of the documents that included an example, the most common scenario described was of an employee knowingly connecting with (“friending” or following) a patient or customer on social media. For example, a large Midwestern hospital system included the following language: “[Organization] strongly discourages ‘friending’ of patients on social media websites. Staff in patient care roles generally should not initiate or accept friend requests except in unusual circumstances such as the situation where an in-person friendship predates the treatment relationship.” Less common examples included posting PHI, posting confidential information, and posting information about other employees or supervisors.
Table 11

Examples

<table>
<thead>
<tr>
<th>Example</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Posting protected health information (PHI)</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Posting confidential information</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Posting competitor information</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Posting “obscene” or “offensive” information</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Posting “slurs” or “discriminatory” content</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Posting “harassing” content</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Posting about supervisors or other employees</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>Posting about patients/customers</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Knowingly following/friending patients/customers</td>
<td>2</td>
<td>2</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

The next section of the coding sheet included other content frequently included in social media policies from the Social Media Governance website or mentioned in articles about social media policies. By far the most common item in the other content category was language about how content posted online could have a negative impact on the organization’s reputation. The majority of the documents included this language. For example, the policy for a global devices/diagnostics manufacturer said, “‘Anything that brings damage to our business or reputation will ultimately be your responsibility.” The next most common items in the other content section were contact information for questions and language about reporting false or
potentially harmful information posted about the company online (regardless of the source, employee or nonemployee); this language was particularly strong in the policies for pharmaceuticals and devices/diagnostics.
Table 12

*Other content*

<table>
<thead>
<tr>
<th>Language</th>
<th>Coder 1</th>
<th>Coder 2</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Yes Responses</td>
<td>Yes Responses</td>
</tr>
<tr>
<td>Mentions content posted online could have a negative impact company/organization reputation</td>
<td>6</td>
<td>10</td>
</tr>
<tr>
<td>Mentions content posted anonymously is not truly anonymous</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>Mentions content posted on social media lives forever</td>
<td>2</td>
<td>5</td>
</tr>
<tr>
<td>Mentions content posted on social media should be presumed visible, even if you think it is private</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Mentions the policy applies to channels and/or circumstances not mentioned specifically</td>
<td>2</td>
<td>9</td>
</tr>
<tr>
<td>Mentions the policy applies to content you share, not just content you write</td>
<td>2</td>
<td>10</td>
</tr>
<tr>
<td>Mentions or recommends use of privacy settings to limit who can view posts</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Says what to do if employee finds false or harmful information about the company/organization online</td>
<td>4</td>
<td>9</td>
</tr>
<tr>
<td>Provides contact information for questions</td>
<td>4</td>
<td>7</td>
</tr>
</tbody>
</table>

The final two questions on the coding sheet involved determining whether any language in the documents conflicted with two communication models (SCCT and SMMC) for RQ2 and NLRB guidance for RQ3. Pertaining to the communication models, the coders sought to identify
whether any language conflicted with these parts of these models: (1) Acknowledging that the organization communicates directly with social media followers and creators and that (2) Publics can access content through social media as well as traditional media. With 100 percent agreement both coders determined that one of the documents analyzed included language that conflicted with the key principles of SCCT and SMMC. In fact, a few of the documents specifically acknowledged the importance of direct, two-way communication with publics via social media. For example, one policy from an insurance company stated, “Social media offer tremendous opportunities to engage with [our] consumers, business partners, prospective talent and associates.”

Pertaining to the NLRB guidance, the coders sought to identify whether any language that appeared to: (1) conflict with NLRB admonitions against discussing and disclosing information regarding their own conditions of employment or the conditions of employment of other employees, (2) threaten employees with discharge or criminal prosecution for failing to report unauthorized access to or misuse of confidential information, (3) prohibit non-commercial use of the Employer’s logo or trademarks, (4) advise against “friending” co-workers or (5) advise employees to report “any unusual or inappropriate internal social media activity”. These were the key points covered in the NLRB memo issued in May 2012. Coder 2 did not feel that any of the policies evaluated included such language. Coder 1, on the other hand, found a potential conflict in the majority of the policies. The primary area of conflict with the NLRB was inclusion of strict rules against use of the organization’s logo, without differentiating between commercial and noncommercial use. Seven of the 10 documents, six of which were created or updated after May 2012, included such language. Examples include: “Constituents may not … misuse the [organization] Logo” (from a health care system) and “Under no circumstances are employees permitted to use the [organization] logo or a [organization] product logo on Social
Media websites.” The second group of items that appear to conflict with NLRB guidance pertains to reporting of potential violations. Several of the documents told employees they should report potential violations of the social media policy; such an instruction may conflict this part of the NLRB guidance: “We also found unlawful the policy’s instruction that employees “[r]eport any unusual or inappropriate internal social media activity” (Solomon, 2012, p. 9). For example, one policy accessed in 2015, three years after the NLRB guidance was issued, said, “[organization] expects team members to report any suspected violations of this policy to their unit or department leader to Human Resources.” Three of the policies, all of which were created or updated since May 2012, avoided potential conflict with NLRB guidance simply by including disclaimer language pertaining to employees’ rights.
Discussion

At its most basic level, a social media policy should make it abundantly clear which activities are not permitted or advisable. The lack of interrater reliability for this study indicates that the policies evaluated were not clear, especially in the areas of restricted activities and potential consequences. In particular, one of the coders noted it was difficult to determine which rules applied to regular employees versus marketing and PR professionals in the organization. Whatever the cause, it is apparent that the policies evaluated leave a lot of room for misinterpretation. If two college-educated professionals who are giving all of their attention to reading and interpreting a policy in order to code it cannot agree on what is restricted, one must wonder what the level of understanding would be for a typical employee. Therefore, the greatest takeaway from the content analysis is that an ideal social media policy clearly spells out what is “do,” a “don’t” and a “be cautious.” In addition, the analysis revealed a lack of clarity on what is allowed at what times (during work hours and outside of working hours) and on what systems (on company-owned systems versus personal devices). Until recently, organizations typically focused on two scenarios: employees using company-owned systems during work hours, and employees using personal resources after work hours. Today, thanks to omnipresent smartphones and work-issued devices that are accessible 24 hours a day, seven days a week, the lines are blurring. Because there are so many gray areas, an effective policy should recognize that employees are using personal devices during work hours and, in some cases, company-owned systems outside of work facilities. It should clarify which rules apply across the board, which ones apply only on company-owned systems, and which ones apply only during work time.

In a similar vein, a lack of definitions and examples leaves room for error. Providing definitions could help illustrate key concepts and potentially reduce the organization’s risk. Examples could serve the same purpose, providing an effective way to illustrate key concepts
and help employees see how the policies apply to real-world scenarios. In particular, it would be
wise to include an example of a crisis communications scenario in the social media policy,
training module, or both. None of the policies evaluated defined or addressed crisis scenarios.
While it may not be necessary to differentiate between a crisis and other situations – the same
rules should apply at all times – it would be a good idea to include a crisis in examples.

One issue that seems to be overlooked in all of the policies evaluated is the source of the
content – that sharing content produced by others carries the same potential risks as posting
original content. Employers should not assume that employees understand sharing is a form of
posting. An effective policy should make it clear that it does not matter where content originates
– whether you post original content or share someone else’s content, the same rules apply.
Another key observation is that listing specific social media channels limits the lifetime of a
policy – or, at the very least, limits the organization’s ability to enforce the policy as new
channels emerge. For example, none of the policies coded mentioned Snapchat (which has
grown in the past few years) and only two mentioned Instagram (which has been around for five
years). Rather than trying to keep up with technology by listing specific channels and updating
the policy often, it would be more efficient to offer some general guidelines about what “social”
is and to state that other channels will be included if they fit this definition.

Another item that must be included is consequences. Very few of the policies evaluated
included specific, concrete words to describe potential consequences – stating in no uncertain
terms that an employee “could lose your job” for violating the policy. In particular, the document
should mention the consequences for sharing protected health information (PHI). With potential
fines of thousands or even millions of dollars for HIPAA violations, along with the recent
expansion of random HIPAA audits being conducted on behalf of the U.S. Department of Health
and Human Services’ Office for Civil Rights, health care organizations must do everything
possible to document that they are strictly enforcing the HIPAA privacy and security rules related to PHI.

Outside of the basics outlined above, the documents generally lacked language about the value of social media. In keeping with the SCCT and SMMC models, social media policies should acknowledge that social media can be a good tool for the organization to engage directly with publics. Likewise, policies should acknowledge that social media can be a good tool for the employees to engage with others within their company and for the benefit of their company. Key to this concept is the research on why people communicate about work using social media – whether it is to share information that helps others or perhaps to seek information for themselves. The communication models make it clear that organizations should not treat social media as a form of technology that only poses risks for the organization, and that any social media usage related to the workplace is a bad idea.

To support two-way communications internally, which is a key concept of the communication models, social media policies should also include information about whom to contact with questions and how to report potentially false or damaging information about the organization if it is found on social media. Similarly, employees should know how to report potential violations of the policy. However, organizations must be cautious in writing this language so as not to conflict with NLRB guidance. To avoid this issue, organizations could use a simple disclaimer, as some of the policies did. One included this statement: “Nothing in this Policy restricts associate’s rights under any federal or state law, including Section 7 of the National Labor Relations Act.” Another included a similar statement: “Nothing in this policy will be interpreted to limit or interfere with an employee’s rights under Section 7 of the National Labor Relations Act.” A third went into detail about the specific activities protected under the law: “Employees are permitted to act together online, or off, to discuss workplace issues (wages,
management, working conditions, etc.) (29 USC § 157).” Use of these disclaimers allowed the organizations to provide clarity about recommended behavior without compromising employees’ rights under NLRB rules.

Overall, the best documents seemed to have a couple of commonalities. They were written in simple language (like an article, not a legal document), and they used formatting such as subheads and bullets to make the content easy to digest. Such an approach benefits the organization as much as the employees. The more complex the document, the more room for confusion and error – which could pose a risk for the organization.

All of these observations went into developing the employer toolkit that follows. The template policy and training module are designed to clearly address the black-and-white issues of social media, as well as the many gray areas that exist. They are designed to highlight the potential benefits of social media, as well as the risks. They are designed to provide clear information about reporting and potential consequences, without limiting employees’ rights as outlined by NLRB. Finally, they are designed to include the key issues specific to health care organizations, such as HIPAA and PHI. Also, it should be noted that while it was valuable to review policies from several types of health care organizations (insurers, pharmaceutical/device makers and hospitals) to determine trends and identify best practices, writing a template policy and training module that applies to these unique environments would create an unnecessary level of complexity. Therefore, the employer toolkit is designed specifically for facilities where employees are providing patient care directly, such as hospitals and doctor’s offices.
Body of the Project

Social Media Policy

Social media guidelines for
<insert orgname>
Updated <insert date>

If you have questions about these guidelines, contact <insert name> at <insert contact information>
If you get questions from the media, refer them to <insert contact department> at <insert contact information>

Note: Where you see a term underlined like this, you can click on it to see a definition and more details

Contents

Why we have these guidelines.................................................................xx
Who these guidelines apply to.................................................................xx
What these guidelines apply to ...............................................................xx
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What to do if you see something that violates these guidelines ..................xx
What could happen if you don’t follow these guidelines .............................xx
Q&A........................................................................................................xx
Definitions...............................................................................................xx

Why do we have these guidelines?
Social media can be a great tool for you to build and maintain relationships with friends, family and others. It can also help <insert orgname> engage our employees, patients, customers and the community in conversations. These conversations can help us achieve our mission to <insert org mission>.

While there are many potential positive impacts of using social media, there are also potential legal, ethical and compliance risks involved with such communications. This is especially true because of the highly regulated nature of the health care industry. Therefore, you might have questions about what you should or should not do, whether you are at work or away from work. These guidelines were created to help you participate in social media with confidence, knowing that you’re taking the right steps to protect your reputation and your employer’s reputation.
Nothing in these guidelines is intended to restrict employees’ rights under any federal or state law, including Section 7 of the National Labor Relations Act.

**Do these guidelines apply to me?**
These guidelines apply to all employees, contractors, and board members of <insert orgname>, as well as any others who provide services on behalf of <insert orgname>. These guidelines apply to use of social media for personal purposes. Separate, more detailed policies apply for people who are authorized to communicate on behalf of <insert orgname>, such as senior management and those in a sales or marketing role. Only employees who are authorized to do so by their department may use social media to speak on behalf of <insert orgname>.

**What do you mean by “use of social media”?**
The guidelines apply to the use of social media during work time and non-work time when:
- You are using company-owned systems
- Your affiliation with <insert orgname> is identified, known or presumed

The term “social media” can be difficult to define because new ways of communicating arise quickly. In general, these guidelines apply to any online systems that are accessible in two ways:
- **Internal channels** – Includes systems, sites, pages, blogs or groups that operate inside the <insert orgname> network or are sponsored by <insert orgname>. These include, but are not limited to internal wikis, discussion forums, email and instant messaging.
- **External channels** – Includes sites, pages, blogs or groups that operate outside of the <insert orgname> network. These include, but are not limited to, Facebook, Twitter, YouTube, Snapchat, LinkedIn, wikis, text messaging and smartphone applications.

It may seem strange to see text messaging listed as a form of social media. Technically, it is not. However, anything you post or share privately – such as text message, personal email or even a written note – could make its way on to social media without your knowledge or permission. With mobile devices, it is incredibly easy for others to capture a screen shot, photo or video and then share it on social media. So even if something isn’t truly “social,” that doesn’t mean it’s private.

**What is <insert orgname>’s policy on social media use?**
First, make sure your social media activity does not interfere with your work commitments or performance. While <insert orgname> does not prohibit use of social media while you are at work, you should limit participation in social media activities during work time unless your position requires it.

In terms of what you say and do, the best advice is to approach online communications in the same way you should approach any other communications: with sound judgment, common sense
and respect for others. Here are some key do’s and don’ts for information you post (meaning you created it) or share (meaning someone else created it) on social media.

<table>
<thead>
<tr>
<th>Do not</th>
<th>Think carefully before you</th>
<th>It’s okay to</th>
</tr>
</thead>
<tbody>
<tr>
<td>Post or share libelous, defamatory, false, indecent, threatening, harassing, or discriminatory language or materials – especially if you are using company-owned systems</td>
<td>“Friend” patients or their family members on social media unless you already had an in-person friendship; you can honestly tell them &lt;insert orgname&gt; discourages it</td>
<td>Say where you work; however, you may want to write something like this on your profile to make it clear that you are speaking for yourself and not on behalf of &lt;insert orgname&gt;: &quot;The views expressed on this [blog; website] are my own and do not reflect the views of my employer</td>
</tr>
<tr>
<td>Post or share confidential information about &lt;insert orgname&gt;</td>
<td>Let a patient take your picture; you can honestly tell them &lt;insert orgname&gt; discourages it</td>
<td>Say what your title is at work</td>
</tr>
<tr>
<td>Post or share anything that violates HIPAA, including patients’ PHI</td>
<td>Post photos or videos taken at work – you could accidentally show PHI or confidential information</td>
<td>Talk about past and present job responsibilities (as long as you don’t share confidential information or PHI in doing so)</td>
</tr>
<tr>
<td>Set up an account or website that uses the &lt;insert orgname&gt; logo, name, or anything else that could make it look like it is run by &lt;insert orgname&gt;</td>
<td>Post photos, videos, or information about coworkers – always ask them if it’s OK first</td>
<td>Post your resume online (as long as you don’t share confidential information or PHI in doing so)</td>
</tr>
<tr>
<td>Post or share anything in a way that makes it seem you are speaking for &lt;insert orgname&gt;</td>
<td>Post or share details about travel on behalf of &lt;insert orgname&gt; – you could accidentally reveal confidential information</td>
<td>“Friend” managers or coworkers on social media; however, we strongly discourage supervisors from initiating friend requests with employees they manage</td>
</tr>
<tr>
<td>Post or share anything that may be construed as political lobbying or solicitation unless you are authorized to do so by &lt;insert orgname&gt;</td>
<td>Post or share anything that others may view as offensive; be mindful that different cultures have different values, so something acceptable or even funny in one culture may be offensive in others</td>
<td>Like, share, and participate with &lt;insert orgname&gt;-sponsored social media accounts such as Facebook, Twitter, and YouTube – in fact, we encourage it!</td>
</tr>
<tr>
<td>Post or share someone else’s intellectual property without giving them credit</td>
<td>Complain about your boss or coworkers on social media; while doing so isn’t prohibited, it’s better to resolve the situation by speaking with management rather than posting online</td>
<td></td>
</tr>
</tbody>
</table>
What should I do if I see something that violates these guidelines?
<Insert orgname> expects employees to report any suspected violations of these guidelines to their unit or department leader or to Human Resources. There will be no retaliation against individuals who raise good faith concerns about actual or potential violations of these guidelines.

Note:
If you see a complaint about our products or services on social media – especially if it is false, libelous or defamatory – please alert <insert contactdepartment> so that it can be addressed.

What could happen if I don’t follow these guidelines?
Anything that brings damage to our organization’s reputation or financial success will ultimately be your responsibility. If you do not follow these guidelines, you may face consequences including:

- A warning (written or oral)
- Suspension
- Termination
- Legal action

Q&A

Does <insert orgname> check job candidates’ social media accounts before hiring them?
Other than checking professional networking sites like LinkedIn, employees engaged in hiring decisions are prohibited from conducting social media background checks on their own. Instead, any such checks should be done by a designated HR/Recruitment professional – and only after it is determined that the individual meets the minimum qualifications to move forward in the interview process. Any rejection of a candidate based on information discovered on social media must be documented clearly to ensure that the decision did not violate any <insert orgname> policies.

Does <insert orgname> monitor employees’ use of social media?
We monitor what people say on internal channels. We also monitor usage on company-owned systems. We do not check employees’ personal social media accounts unless there is a specific reason to do so, such as a harassment complaint.

Could my boss prevent me from taking time off because of what I post on social media?
Managers may not approve, deny or limit leaves of absence on the basis of information on an employee’s social media site without consulting with Human Resources.

Definitions

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**Company-owned systems**
Any technology owned, managed or sponsored by <insert orgname> or on behalf of <insert orgname>. Examples include computers in our facilities, tablets and mobile devices issued to employees, and the networks that connect our systems.

**Confidential**
Any information about <insert orgname> that is not public. Examples include expansion or acquisition plans, revenue and customers.

**Defamatory**
Information that could damage someone’s reputation.

**Discriminatory**
Information that shows an unfair or prejudicial distinction between different categories of people or things, especially on the grounds of race, age, or sex.

**Harassing**
Behavior that torments or irritates another person.

**HIPAA**
Short for “Health Insurance Portability and Accountability Act,” the law that restricts sharing of PHI.

**Illegal**
Anything that violates local, state, or federal laws, rules, or regulations.

**Indecent**
Lewd, vulgar or otherwise offensive to accepted standards of decency or modesty.

**Intellectual property**
Copyrighted works, trademarks, or patented inventions.

**Libelous**
A false statement that could damage the reputation of a person or organization.

**PHI**
Short for “Protected Health Information.” Examples include a patient’s name, birth date, phone number, email address, Social Security number, diagnoses and treatments. Also includes photos and videos showing a patient’s face.

**Threatening**
Having a hostile or deliberately frightening quality or manner.

Social Media Training Module

Note: The PowerPoint file for this training module is available to view and download at http://www.slideshare.net/hoosierpaige/healthcaresocialmediatrainingtemplate

Using Social Media Wisely

How to protect your reputation and your employer’s reputation
THE BASICS

Why we have social media guidelines

There are many potential positive impacts of social media, but there are also potential legal, ethical and compliance risks.

This is especially true because:
• The health care industry is highly regulated by privacy laws such as HIPAA
• People hold health care providers to high standards for ethics
Why we have social media guidelines

Example:
A New Mexico nurse, Amanda Francis, was fired in April 2015 and faced loss of her nursing license. The reason: she posted offensive comments on her Facebook page such as...

- Negative comments about Native American women
- Wishing a patient would code so she would not be so bored at work

Source:
http://www.kob.com/article/stories/a3764261.shtml#Vf2gYUwF8c

Why we have social media guidelines

Our guidelines were created to help you protect your reputation and protect your employer’s reputation

They are not intended to restrict employees’ rights under any federal or state law, including Section 7 of the National Labor Relations Act
Do these guidelines apply to me?

The basic social media guidelines covered in this training program apply to:
• Employees
• Contractors
• Board members
• Any others who provide services on behalf of <insert orname>

Additional policies apply for people authorized to communicate on behalf of our organization

Do the guidelines all the time?

The basic social media guidelines covered in this training program apply to use of social media during work time and non-work time when:
• You are using company-owned systems
• Your affiliation with <insert orname> is identified, known or presumed
What is a company-owned system?

Definition: Company-owned systems
Any technology owned, managed or sponsored by <insert orgname> or on behalf of <insert orgname>

Examples: computers in our facilities, tablets and mobile devices issued to employees, networks that connect our systems

What is social media?

Merriam-Webster Dictionary definition:
Forms of electronic communication through which users create online communities to share information, ideas, personal messages, and other content

Social media can be internal or external
What is social media?

**Internal channels**

Systems, sites, pages, blogs or groups that operate inside the `<insert orgname>` network or are sponsored by `<insert orgname>`

Includes internal wikis, discussion forums, email and instant messaging

---

What is social media?

**External channels**

Sites, pages, blogs or groups that operate outside of the `<insert orgname>` network

Includes Facebook, Twitter, YouTube, Snapchat, LinkedIn, wikis, text messaging and smartphone applications
What is social media?

Why text messaging?

Technically is it not “social media” – but anything you post or share privately could make its way on to social media without your knowledge or permission.

DOS AND DON’TS
Do

Communicate with sound judgment, common sense and respect for others

*Behave online just as you should behave in the “real world”*

Do

Make sure social media activity doesn’t interfere with your work commitments or performance

*Limit participation in social media activities during work time unless your position requires it*
Do

Feel free to say where you work and what you do

*But consider putting something like this on your profile:*

“The views expressed here are my own and do not reflect the views of my employer”

Do

Feel free to describe your job title and responsibilities in an online resume

*Just be sure you don’t disclose confidential information or Protected Health Information in doing so*
Do

Alert <insert contact department> if you see complaints about our products or services on social media

*This is especially important if the information is incorrect or potentially damaging*

Do

Refer any questions from the media to <insert contact department>

*This includes bloggers and other “unofficial” media members*
Do

Refer any questions from the media to <insert contact department>
Do

Like, share, and participate with <insert orgname>-sponsored social media accounts such as Facebook, Twitter, and YouTube

*In fact, we encourage it!*

Don’t

Post or share libelous, defamatory, false, indecent, threatening, harassing, or discriminatory language or materials – especially when using company-owned systems

*This includes inappropriate or sexually explicit messages, as well as jokes about people of a certain race, color or religion*
Don’t

Post or share confidential information about <insert orgname>

Confidential information is anything about <insert orgname> that is not public, such as financial information and expansion plans

Don’t

Post or share anything that violates HIPAA privacy rules, including Protected Health Information

PHI includes patient names, diagnoses and treatments, as well as photos and videos showing a patient’s face
Don’t

Set up an account or website that could make it look like it is run by `<insert orgname>`

*Examples include a website with the `<insert orgname>` logo or a Twitter account that includes any form of “<insert orgname>”*

Don’t

Answer any questions about `<insert orgname>` from the media (including bloggers) unless you are authorized to do so

*Refer them to `<insert contact department>`*
Don’t

Post or share anything in a way that makes it seem you are speaking for <insert orgname>

*For example, don’t comment on a news story and say “as an employee of <insert orgname>...”*

Don’t

Post or share someone else’s intellectual property without giving them credit

*Examples include posting a passage from a book that is copyrighted and claiming someone else’s invention as your own*
Use caution

“Friending” patients or their family members on social media (unless you already had an in-person friendship)

You can honestly tell them <insert orgname> discourages this

Use caution

Letting a patient or their family take your picture

You can honestly tell them <insert orgname> discourages this
Use caution

Posting photos/videos of your workplace or coworkers

Ask coworkers if it’s OK first – and be careful not to show PHI or confidential information

Use caution

Posting details about travel on behalf of <insert orgname>

You could accidentally reveal confidential information
Use caution

Posting or share anything that others may view as offensive

Different cultures have different values, so something acceptable or even funny in one culture may be offensive in others

Use caution

Posting or sharing anything about illegal activities

It reflects poorly on you and your employer
Use caution

Complaining about your boss or coworkers on social media

*It’s better to resolve the situation by speaking with management rather than posting online*

REPORTING VIOLATIONS
Reporting violations

<Insert orgname> expects employees to report any suspected violations of this policy to their unit or department leader or to Human Resources.

Potential consequences

Employees who do not follow these guidelines may face consequences including:
- A warning (written or oral)
- Suspension
- Termination
- Legal action
No retaliation for reporting

There will be no retaliation against individuals who raise good faith concerns about actual or potential violations

TEST YOURSELF
What would you do?

A family member posts on your Facebook wall, asking you if a rumor about upcoming layoffs at <insert orgname> is true. You’ve heard the same rumor, but nothing has been announced publicly. What do you say?

A. “That’s what I heard, too.”
B. “Probably. I bet they’ll make an announcement soon.”
C. “I can’t say for sure. Nothing official has been announced.”

What would you do?

The correct answer is C. Do not talk about anything that hasn’t been announced publicly on social media.

A. “That’s what I heard, too.”
B. “Probably. I bet they’ll make an announcement soon.”
C. “I can’t say for sure. Nothing official has been announced.”
What would you do?

A patient films a video in her room and asks for your Instagram handle so she can tag you. What do you do?
A. Give her your Instagram handle.
B. Politely tell her <insert orgname> advises against connecting with patients on social media.
C. Tell her you’re not on Instagram (even though you are).

What would you do?

The correct answer is B. Avoid “friending” or any other social media connection with patients.

A. Give her your Instagram handle.
B. Politely tell her <insert orgname> advises against connecting with patients on social media.
C. Tell her you’re not on Instagram (even though you are).
What would you do?

You take a selfie in the break room with a coworker. Do you share it on social media?

A. If it’s a good picture, why not?
B. No, because it was taken at work.
C. Yes, but only if it doesn’t show patient information or confidential information.

What would you do?

The correct answer is C. Also make sure your coworker is okay with you posting it.

A. If it’s a good picture, why not?
B. No, because it was taken at work.
C. Yes, but only if it doesn’t show patient information or confidential information.
ADDITIONAL GUIDELINES FOR SUPERVISORS

Social media and hiring decisions

Other than checking professional networking sites like LinkedIn, employees engaged in hiring decisions are prohibited from conducting social media background checks on their own.

Such checks should be done by a designated HR/Recruitment professional.

Any rejection of a candidate based on information discovered on social media must be documented clearly.
Social media and time off

Managers/supervisors may not approve, deny or limit leaves of absence on the basis of information on an employee’s social media site without consulting with Human Resources.

Friending coworkers

Employees are allowed to “friend” managers or coworkers on social media.

However, let the employee initiate the request – we strongly discourage supervisors from initiating friend requests with employees they manage.
Reporting issues

If an employee reports suspected violations of our social media guidelines, contact your department leader or Human Resources immediately.

There will be no retaliation against individuals who raise good faith concerns about actual or potential violations of this policy.

SUMMARY
Summary

1. Don’t let social media get in the way of work performance
2. Be careful not to post confidential information or PHI
3. Don’t post anything that reflects poorly on you or your employer – especially if you are using company-owned systems

Questions?

If you have questions about our social media guidelines, contact:

<insert name>
<insert contact information>
Interactive Quiz
Note: Organizations can build an interactive quiz easily using a free tool such as https://www.qzzr.com/

Which office sitcom character are you?

<table>
<thead>
<tr>
<th>Questions/Responses</th>
<th>Answer Maps To</th>
</tr>
</thead>
<tbody>
<tr>
<td>How many coworkers are you Facebook friends with?</td>
<td></td>
</tr>
<tr>
<td>A. I don’t do Facebook</td>
<td>The quiet one</td>
</tr>
<tr>
<td>B. Fewer than 10</td>
<td>The quiet one</td>
</tr>
<tr>
<td>C. 10 or more</td>
<td>The socializer</td>
</tr>
</tbody>
</table>

If your coworkers were to describe in you one word, what would it be?

| A. Quiet | The quiet one |
| B. Kind | The socializer |
| C. Annoying | The office gossip |

You hear a rumor that two coworkers are dating. What do you do?

| A. Just ask them | The socializer |
| B. Who cares? | The quiet one |
| C. Tell everyone they’re dating and see if they deny it | The office gossip |

There’s a story in the paper that says bad things about your company. What do you do?

| A. I might read it if I have time | The quiet one |
| B. Read it and then talk to everybody else about what it said | The office gossip |
| C. Read it and then share it on Facebook, Twitter, etc. | The office gossip |

A coworker has a death in the family. What do you do?

| A. Organize a group to send flowers | The socializer |
| B. Send an email expressing your condolences | The socializer |
| C. Nothing | The quiet one |

How much does your family know about your job?

| A. Everything – the good, the bad, the ugly | The office gossip |
| B. A little | The socializer |
| C. Nothing – I don’t like to talk about it | The quiet one |
Results

You’re the quiet one
When it comes to coworkers, you like to maintain a strong sense of privacy. You tend to watch from the sidelines and keep information to yourself. Your coworkers might call you antisocial, but it’s just a matter of having boundaries.

You’re the socializer
You’re the glue that keeps everything together at work. If you are curious about what others are doing, it’s only because you care about them. Just be sure your curiosity doesn’t come off as meddling! This is especially true if you’re friends with your coworkers on social media. Set some boundaries so your coworkers don’t feel like you’re invading their privacy.

You’re the office gossip
Once you think something, you have to say it. Once you get a piece of information, you just have to share it. Let’s be honest: you’re a bit of a gossip. While you may have the best of intentions, sometimes it’s best to hold your tongue! This is especially true on social media, where a joke or comment you think is funny could be perceived as inappropriate or hurtful.
Internal Communications

Intranet language

Social media training: Learn the key dos and don’ts for using social media wisely
Social media training program

Social media guidelines: Rules and advice on what to do and what not to do
Social media guidelines for <insert orgname>

Quiz: Get advice on how to use social media wisely based on which character you’re most like
Which office sitcom character are you?

Email messages

#1
Subject: New social media guidelines and training available now

As social media and smartphones continue to play a larger role in our everyday lives, deciding what to do (and what not to do) has become tricky. You may have questions like:

- Should I accept a friend request from my boss?
- Can I use social media on my cellphone while I’m at work?
- Am I allowed to comment on news stories about <insert orgname>?

To help you answer these questions and many more, we’ve created a new social media training program. The program goes along with our newly created social media guidelines for employees.

As an employee it is your responsibility to read and follow the guidelines. Doing so will help protect your reputation and avoid consequences ranging from warnings to legal action.

Just for fun, we’ve also created an interactive quiz that gives you personalized advice on using social media. Take the quiz here: which office sitcom character are you?

If you have questions about using social media, contact <insert contactname> from <insert department>.

Sincerely,
<insert sendername>
#2
Subject: Reminder – social media training

When it comes to social media, there is a fine line between entertaining and inappropriate – so you may have questions such as …

- What should I do if a patient sends me a friend request?
- Will I get in trouble if I complain about a coworker on Facebook?
- Can I post videos taken at work?

You can find the answers to these questions and more in our new social media guidelines and social media training program. You’ll find the key “rules and regulations” you should know, as well as examples of what to do in real-world scenarios. Plus, just for fun, you can take the which office sitcom character are you? quiz for additional tips on using social media wisely.

If you have questions about using social media, contact <insert contactname> from <insert department>.

Sincerely,

<insert sendername>
Outside Reviews of the Project

Evaluation for Paige Moore Creative Project

Evaluator: Geoffrey McLeod, CEO, Pee Dee Orthopaedic Associates

Evaluator’s Credentials: Currently, I am the CEO of Pee Dee Orthopaedic Associates (PDOA) in Florence, South Carolina. I have been with PDOA since 2008. I was the Administrative Director for the Department of Orthopaedic Surgery at UF Health in Jacksonville, Florida from 2002-2008. Prior to my employment at UF Health, I was an Office Coordinator with OrthoIndy from 1997-2002. I hold a Bachelor of Arts in Business Administration from Kentucky Wesleyan College and a Master’s of Science in Health Care Administration from Western Kentucky University.

Relationship to the student and subject matter: I attended Kentucky Wesleyan College with Paige and have remained in contact with her since our graduation. The subject of her paper is of extreme interest to me since I am directly responsible for all human resource (HR) issues at PDOA, including developing and writing policies and procedures.

Evaluation of the topic as appropriate for the creative endeavor: In the particular environment in which PDOA operates, the subject matter Paige chose is extremely relevant and timely, since personnel issues associated with some aspect of social media involvement are becoming more and more common. Facebook, Twitter, YouTube, etc. create many potential complex personnel/corporate issues, and a comprehensive Social Media Policy is vital to ensuring a compliant and cohesive workplace.
**Evaluation of student’s approach:** Paige’s Creative Project is thoroughly researched, utilizing policies from a wide variety of sources across several industries. Paige successfully merged various items from the selected organizations into a succinct document which allows an individual or entity to tailor the policy to specific situations. In my position, I am solely responsible for the management of an 11 physician Orthopaedic group, which employs 104 individuals, and receives approximately $16 million in revenue annually. I do not have the time to duplicate Paige’s project, and would pay an outside organization to develop a similar policy.

**Evaluation of the body of the project:**

a. **Quality:** The quality of Paige’s project is very high. Paige took components of an extremely complex concept from different organizations in a variety of industries into a document that is easy to understand, easy to adapt to individual situations and environments, and easy to digest. Paige’s project is a “plug and play” for administrators/managers that need a common sense approach to disseminating information across various departments within any health care organization. Paige included “inserts” for quick customization, a glossary for clarification, and an interactive quiz - all of which add to the quality of the document.

b. **Depth of Treatment:** It is clear to this Evaluator that Paige has experience working with a variety of organizations within the health care spectrum. Paige took elements of policies from a variety of sources and molded the elements into a document that could just as easily be utilized at an insurance company as a dermatology practice or a hospital. The training module is entertaining and thorough, but short enough in time frame so that attendees will not lose interest in the subject matter. This is extremely refreshing, since I’ve sat through more boring training sessions over the years than I care to count.
c. **Coverage:** Paige’s project is extremely thorough in providing content that is applicable in any health care environment. Should an administrator/manager in a particular environment wish to add or change the material in Paige’s project, the quality of content allows for easy changes. Paige successfully relayed complex ideas into a format which is easy to digest by employees of varying education backgrounds, a component lacking in a number of policies I’ve read over the years in several settings.

**Evaluation of the student’s work as contributing to the field (e.g., body of work):** Having spent almost my entire professional life in Orthopaedic administration, I am well versed in reading, developing, and writing policies. One of the main difficulties in writing policies is consolidating complex information from a variety of sources into a singular cohesive document that appropriately captures information into a format that can be understood from those with advanced degrees to those with little formal education. Paige’s project achieves that goal. I am confident than any organization that I’ve worked with could successfully utilize this policy today. This document fills a void that exists in health care today – an easy to follow plan (and easily adaptable plan) for a complex problem. Paige’s policy is an outstanding addition to the field.

**Evaluation for Paige Moore Creative Project**

**Evaluator:** Betsy Shirey

**Brief discussion of evaluator’s credentials (knowledge and experience of the subject area)**

I have a master’s degree in communication from Georgia State University, with graduate studies that included crisis communications, persuasion, advertising, and public relations. In addition, I have more than 30 years of experience in marketing communications, with the last 12 of those specifically in health care communications.
Relationship to the student and subject matter

I met Paige Moore as a candidate for a writer position on my team at Humana. I hired Ms. Moore and regard her as the best hire I ever made. During her tenure on my team, she became the primary writer for digital communications and also showed facility for all things technology, demonstrating a high level of understanding of website frameworks and use of social media. Today I am gratified to see how much she has grown and matured as a content manager, designer, and marketer while still continuing to hone her writing skills.

Evaluation of the topic as appropriate for the creative endeavor

This is a timely and appropriate topic for health care communications because social media has become a part of all communications in society. Even those who do not use social media are affected by it, as it is regularly part of news stories, mentioned in television shows, and used for entertainment. Companies that do not manage their presence in social media risk having their customers and competitors manage it for them.

Evaluation of student’s approach

This is a thorough approach to the project. It is also easy to follow and read. The topic is important as health care organizations today face regulations and scrutiny to a greater degree than many other industries. At the same time, many consumers see health care as different from other kinds of industries. It is not a commodity or a purchase; rather, it is about their life itself. Therefore, it is even more critical that employees of a health care organization use social media carefully than it is for employees of retail industries or charities. Ms. Moore created an easily usable, adaptable collection of materials. She also receives points for the sit-com quiz, which is entertaining. I do think this quiz is a little too simplified, however. Also, if the participant has never seen the shows from the characters came, the real value may be lost. It might be good to
use a wider variety of characters from shows that hugely popular over years, such as “Friends” or “Seinfeld.”

Evaluation of the body of the project

Evaluation of the body of the project: Quality, Depth of Treatment, Coverage

a. Quality

The quality of the policy and training program is excellent. They are well-written, clear, and easily implemented. It is also helpful to have all the terms defined for quick reference. Use of links within the document makes it easy to navigate from section to section – for example, to click on a word and go to the definition in the back. Placing items like definitions in the back also keeps the body of the document simple and easy to read. The format also uses the best readability techniques – employment of bullets, short paragraphs, and white space. Use of examples in the training deck helps increase understanding. Interactive quiz creates engagement and makes the overall program seem more like a fun activity rather than a requirement. Again, however, I suggest building out this quiz to include more characters, as well as more recognizable personalities.

b. Depth of Treatment

The policy is in-depth without being overlong. It is shorter than many I have seen, and that, in my view, is an advantage. Other than crisis communications, it contains all the pertinent information quickly and is interesting to read. The length of the training deck is a little short. It is engaging and interesting, as well as presented with good application of principles for slide design. While the presentation goes over key points, I think it would be helpful to add some exercises. The training should last 30 minutes. If another 7 minutes or so are included for exercises, there could be 8 minutes allowed for discussion and questions.

c. Coverage
This toolkit is comprehensive, as stated previously. The only area that I believe could be addressed more thoroughly is what to do when something goes wrong: How does an organization manage a social media situation that gets out of control – where negative and especially false postings are appearing? Information specific to crisis communications is lacking – to more fully cover the topic, the policy should address crisis situations and make it clear that these situations require greater diligence.

**Evaluation of the student’s work as contributing to the field (e.g., body of knowledge)**

Ms. Moore did a comprehensive job of reviewing nearly a dozen policies to glean the best tips and examples. The templates are customizable for a specific organization and make it very easy to create, develop, and implement a social media policy. The language is simple and clear, as well as engaging. In addition to its usability and functionality, this project demonstrates Ms. Moore’s strong knowledge of social media.
References


doi:10.1111/jcc4.12032


## Coding Sheet: Health Care Organization Social Media Policies

<table>
<thead>
<tr>
<th>Item to code</th>
<th>Type of response</th>
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</thead>
<tbody>
<tr>
<td><strong>General information:</strong></td>
<td></td>
</tr>
<tr>
<td>Name of Company/Organization</td>
<td>Free text entry</td>
</tr>
<tr>
<td>Date of Policy</td>
<td>Free text entry</td>
</tr>
<tr>
<td>Coder</td>
<td>Free text entry</td>
</tr>
<tr>
<td>Date Coded</td>
<td>Free text entry</td>
</tr>
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<td><strong>Terminology:</strong></td>
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<td>Referred to as a guideline</td>
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<tr>
<td>Defines “working hours” or refers to another</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>document that does</td>
<td></td>
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<tr>
<td>Defines “protected health information (PHI)”</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>or refers to another document that does</td>
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<tr>
<td>Defines “confidential” information</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<td>Defines “crisis”</td>
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<td>Defines “obscene” or “offensive” content</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Defines “slurs” or “discriminatory” content</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Defines “harassment”</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Other definitions:</td>
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<tr>
<td><strong>Scope:</strong></td>
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<tr>
<td>Mentions blogs</td>
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<tr>
<td>Mentions email</td>
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<tr>
<td>Mentions instant messaging</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions internal social networks</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions Facebook</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Mentions Instagram</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<td>Mentions LinkedIn</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Mentions Snapchat</td>
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<tr>
<td>Mentions Twitter</td>
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<td>Mentions YouTube</td>
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<td>Other channels:</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td><strong>Monitoring:</strong></td>
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<tr>
<td>Mentions that social media accounts may be</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>checked before hire</td>
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<td>Mentions that social media usage may be monitored</td>
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<tr>
<td>Describes how social usage is monitored</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td><strong>Restricted activities:</strong></td>
<td></td>
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<tr>
<td>Restricts employee use of social media outside of work hours</td>
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<tr>
<td>Restricts employee use of social media during working hours</td>
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<tr>
<td>Restricts employees from listing their employer on social media accounts</td>
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<tr>
<td>Mentions that employees should not post “obscene” or “offensive” content</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not post “slurs” or “discriminatory” content</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not post “harassing” content</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not share protected health information (PHI) on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not post photos taken at the workplace</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Mentions that employees should not post videos taken at the workplace</td>
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</tr>
<tr>
<td>Mentions that employees should not talk about the company/organization’s business or financial matters on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not talk about the company/organization’s competitors on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not talk about supervisors or other employees on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not talk about patients/customers on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that employees should not knowingly follow/friend patients/customers on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Other restrictions:</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td><strong>Reporting:</strong></td>
<td></td>
</tr>
<tr>
<td>Says how to report potential violations</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Says there are consequences for failing to report known violations</td>
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<td><strong>Potential consequences:</strong></td>
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<td>Remove post</td>
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<tr>
<td>Shut down account</td>
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<tr>
<td>Demotion</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td><strong>Suspension</strong></td>
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<tr>
<td><strong>Termination</strong></td>
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<tr>
<td><strong>Legal action</strong></td>
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<tr>
<td><strong>Other consequence:</strong></td>
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</tr>
<tr>
<td><strong>Examples:</strong></td>
<td></td>
</tr>
<tr>
<td>Provides example of posting protected health information (PHI)</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Provides example of posting confidential information</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Provides example of posting competitor information</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Provides example of posting “obscene” or “offensive” information</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Provides example of posting “slurs” or “discriminatory” content</td>
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<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Provides example of posting about supervisors or other employees on social media</td>
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</tr>
<tr>
<td>Provides example of posting about patients/customers on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Provides example of knowingly following/friending patients/customers on social media</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td><strong>Other examples:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Other content:</strong></td>
<td></td>
</tr>
<tr>
<td>Mentions that content posted online could have a negative impact company/organization reputation</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
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<tr>
<td>Mentions that content posted anonymously is not truly anonymous</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that content posted on social media lives forever</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that content posted on social media should be presumed visible, even if you think it is private</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions this policy applies to channels and/or circumstances not mentioned specifically</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions that the policy applies to content you share, not just content you write</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Mentions or recommends use of privacy settings to limit who can view posts</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Says what to do if employee finds false or harmful information about the</td>
<td>1-Yes, 2-No, 3-Not Able to Determine</td>
</tr>
<tr>
<td>Company/Organization Online</td>
<td>Provides contact information for questions</td>
</tr>
<tr>
<td>-----------------------------</td>
<td>--------------------------------------------</td>
</tr>
<tr>
<td>Communication theories:</td>
<td>Does any language in the document conflict with key principles of the SCCT and/or SMMC models?</td>
</tr>
<tr>
<td>NLRB guidance:</td>
<td>Does any language in the document conflict with guidance on social media policies issued by the National Labor Relations Board in May 2012?</td>
</tr>
</tbody>
</table>
Code Book: Health Care Organization Social Media Policies

Section 1: General Information
These items are for reference only and will not be used in the content analysis.

1. Name or Organization
   Enter the name of the organization whose social media policy is being coded. If known, fill in the name of the organization. If the name is not available, enter “unknown.”

2. Date of Policy
   Enter the date the policy went into effect. If known, fill in the month and year the document was last updated in this format: “Month Year” (ex: April 2015). If the date is not available, enter “unknown.”

3. Coder
   Enter your initials (ex: “PM” or “SG”) to indicate which coder completed the code sheet. For this study there is the primary coder and the secondary coder.

4. Date Coded
   Enter the date you completed the coding sheet for this document using this format: “MM/DD/YYYY” (ex: “7/1/2015”).

Section 2: Terminology
Social media policies may use different terms to describe the role or purpose of the document. This terminology is often in the title of the document; however, other terms may be used in the body of the document. Therefore, the coder should use the find feature (Ctrl+F on a PC) to search for these specific terms in the document.

1. Referred to as an agreement
   Select Yes, No, or Unable to Determine to note whether the document is considered an agreement. It must use this specific term, either as singular “agreement” or plural “agreements.”

2. Referred to as a policy
   Select Yes, No, or Unable to Determine to note whether the document is considered a policy. It must use this specific term, either as singular “policy” or plural “policies.”

3. Referred to as a procedure
   Select Yes, No, or Unable to Determine to note whether the document is considered a procedure. It must use this specific term, either as singular “procedure” or plural “procedures.”

4. Referred to as a guideline
   Select Yes, No, or Unable to Determine to note whether the document is considered a guideline. It must use this specific term, either as singular “guideline” or plural “guidelines.”

5. Referred to as a recommendation
   Select Yes, No, or Unable to Determine to note whether the document is considered a recommendation. It must use this specific term, either as singular “recommendation” or plural “recommendations.”

6. Other terms
   If the document uses any other terms to describe the role of the document (ex: “Standards”), select Yes. The coder can use the Open Text Entry column to document other terminology.
used to describe the role/purpose of the document, but it is not required. If not other terms are used to describe the role/purpose of the document, select No.

Section 3: Definitions
Definitions may be included in the document in a separate glossary/definitions section or presented within the document. The coder should use the find feature (Ctrl+F on a PC) to search for these specific terms in the document. Language of the following nature is considered a definition:

- “[term] is defined as …”
- “[term] is…”
- “[term] includes …”

1. Defines “social media”
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of social media. Any form of these words (noun, adjective, gerund) would count as a Yes.

2. Defines “working hours” or refers to another document that does
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of working hours. If the document specifically names another place where this term is defined, enter an “X” under Yes. Any form of these words (noun, adjective, gerund) would count as a Yes.

3. Defines “protected health information (PHI)” or refers to another document that does
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of protected health information or an alternative/proprietary term for the same type of information (ex: patient health information). If the document specifically names another place where this term is defined, enter an “X” under Yes. Any form of these words (noun, adjective, gerund) would count as a Yes.

4. Defines “confidential” or “proprietary” information
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of company confidential information, proprietary information, or both. Any form of these words (noun, adjective, gerund) would count as a Yes.

5. Defines “crisis”
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of a crisis for the organization. Any form of these words (noun, adjective, gerund) would count as a Yes.

6. Defines “obscene” or “offensive” content
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of obscene content, offensive content, or both. Any form of these words (noun, adjective, gerund) would count as a Yes.

7. Defines “slurs” or “discriminatory” content
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of a slur or discrimination. Any form of these words (noun, adjective, gerund) would count as a Yes.

8. Defines “harassment”
   Select Yes, No, or Unable to Determine to note whether the document includes a definition of harassment or harassing. Any form of these words (noun, adjective, gerund) would count as a Yes.
7. Other definitions:
   If the document defines any other terms (ex: Spam), either in a definitions section or within
   the document, select Yes. The coder can use the Open Text Entry column to document the
   other term(s) defined, but it is not required. If not other terms are defined in the document,
   select No.

Section 4: Scope
Social media policies often list specific channels/platforms that are within the scope of the
policy. This language may be included within in a definition or elsewhere in the document.
Therefore, the coder should use the find feature (Ctrl+F on a PC) to search for these specific
channels/platforms.

1. Mentions blogs
   Select Yes, No, or Unable to Determine to note whether the document specifically lists blogs
   as within scope for the policy.

2. Mentions email
   Select Yes, No, or Unable to Determine to note whether the document specifically lists email
   (either personal or work-related) as within scope for the policy.

3. Mentions instant messaging
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   instant messaging (either personal or work-related) as within scope for the policy.

4. Mentions internal social networks
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   internal social networks as within scope for the policy. These networks may be identified
   using a proprietary or internal name.

5. Mentions Facebook
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   Facebook as within scope for the policy.

6. Mentions Instagram
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   Instagram as within scope for the policy.

7. Mentions LinkedIn
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   LinkedIn as within scope for the policy.

8. Mentions MySpace
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   MySpace as within scope for the policy.

9. Mentions Snapchat
   Select Yes, No, or Unable to Determine to note whether the document specifically lists
   Snapchat as within scope for the policy.

10. Mentions Twitter
    Select Yes, No, or Unable to Determine to note whether the document specifically lists
    Twitter as within scope for the policy.

11. Mentions YouTube
    Select Yes, No, or Unable to Determine to note whether the document specifically lists
    YouTube as within scope for the policy.
8. Other channels
If other document lists any other channels/platforms in scope for the policy, either by name or in general (ex: “video sharing sites” or “microblogging”), select Yes. The coder can use the Open Text Entry column to document the channels/platforms, but it is not required. If not other channels/platforms are listed as in scope, select No.

Section 5: Monitoring
Social media policies sometimes explain how the organization monitors employee behavior. To find this language, the coder should use the find feature (Ctrl+F on a PC) to search for any language including the term “monitor.” However, the coder will need to read the entire policy in case it uses a synonym such as “check” or “observe.”

1. Mentions that social media accounts may be checked before hire
Select Yes, No, or Unable to Determine to note whether the document includes any language indicating that potential employees’ social media accounts may be checked as part of the hiring process.

2. Mentions that social media usage may be monitored
Select Yes, No, or Unable to Determine to note whether the document includes any language indicating that current employees’ social media accounts may be checked in any way, either on an ongoing basis or to investigate potential violations.

3. Describes how social usage is monitored
Select Yes, No, or Unable to Determine to note whether the document includes any language describing how social media usage may be monitored, such as an automated system or sporadic checks.

Section 6: Restricted activities
Restricted activities are any behaviors that the document specifically advises against. The way these activities are described can vary greatly from one policy to another. Also, the force of the language can vary greatly, from a strong “do not …” to a gentle “we recommend against.” To find language about restricted activities, the coder will need to use the find feature (Ctrl+F on a PC) to search for specific words such as “harass” and “obscene.” In addition, the coder will need to read the entire policy and use his/her best judgment to determine whether it restricts or discourages the activity.

1. Restricts or discourages employee use of social media outside of work hours
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages use of social media outside of working hours.

2. Restricts or discourages employee use of social media during working hours
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages use of social media during working hours unless the employee is authorized to do so for work-related purposes.

3. Restricts or discourages employee use of social media on company-owned systems
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages use of social media on company-owned or company-operated systems unless the employee is authorized to do so for work-related purposes.
4. Restricts or discourages employees from listing their employer on social media accounts
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages employees from listing who they work for on their social media accounts.

5. Mentions that employees should not post “obscene” or “offensive” content
Select Yes, No, or Unable to Determine to note whether the document includes any language that prohibits posting or sharing content that may be considered obscene and/or offensive. Mark as Yes only if one or both of these specific words are used. Any form of these words (noun, adjective, gerund) would count as a Yes.

6. Mentions that employees should not post “slurs” or “discriminatory” content
Select Yes, No, or Unable to Determine to note whether the document includes any language any language that prohibits posting or sharing content that may be considered a slur and/or discriminatory. Mark as Yes only if one or both of these specific words are used. Any form of these words (noun, adjective, gerund) would count as a Yes.

7. Mentions that employees should not post “harassing” content
Select Yes, No, or Unable to Determine to note whether the document includes any language that prohibits posting or sharing content that may be considered harassment. Mark as Yes only if one or both of these specific words are used. Any form of these words (noun, adjective, gerund) would count as a Yes.

8. Mentions that employees should not share protected health information (PHI) on social media
Select Yes, No, or Unable to Determine to note whether the document includes any language that prohibits posting or sharing protected health information (PHI). Mark as Yes only if protected health information or an alternative term for PHI is used.

9. Mentions that employees should not post photos taken at the workplace
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages posting photos taken at work.

10. Mentions that employees should not post videos taken at the workplace
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages posting videos taken at work.

11. Mentions that employees should not talk about the company/organization’s business or financial matters social media
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages posting information about the organization’s business or financial matters. Often this information is described as “confidential” or “proprietary,” though other terms may be used.

12. Mentions that employees should not talk about the company/organization’s competitors on social media
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages posting information about the organization’s competitors.

13. Mentions that employees should not talk about supervisors or other employees on social media
Select Yes, No, or Unable to Determine to note whether the document includes any language that restricts or discourages posting about other employees, including supervisors or managers.
14. Mentions that employees should not talk about patients/customers on social media
   Select Yes, No, or Unable to Determine to note whether the document includes any
   language that restricts or discourages posting about patients or customers, regardless of
   whether the information includes PHI.
15. Mentions that employees should not knowingly follow/friend patients/customers on
   social media
   Select Yes, No, or Unable to Determine to note whether the document includes any
   language that restricts or discourages “friending” or “following” patients, their family
   members, or customers on social media.
16. Other restrictions
   If the document lists any other restriction on employees’ social media usage (ex: do not
   use social media while driving a company-owned vehicle), enter select Yes. The coder
   can use the Open Text Entry column to describe the restriction, but it is not required. If
   no other restrictions are included, select No.

Section 7: Reporting
To find this language, the coder should use the find feature (Ctrl+F on a PC) to search for any
language including the term “report” or “notify.” However, the coder will need to read the entire
policy in case it uses a synonym.

1. Says how to report potential violations
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   about how to report known or suspected violations of the policy.
2. Says there are consequences for failing to report known violations
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   about potential consequences for employees who are aware of violations of the policy and do
   not report them.

Section 8: Potential consequences
To find this language, the coder should use the find feature (Ctrl+F on a PC) to search for any
language including the term “consequence” or “repercussion.” However, the coder will need to read the entire
policy in case it uses a synonym.

1. Remove post
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   that indicates an employee who violates the policy may be asked to remove or delete the specific post that violated the policy.
2. Shut down account
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   that indicates an employee who violates the policy may be asked to shut down or delete the account where the violation occurred.
3. Demotion
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   that indicates an employee who violates the policy may be subject to demotion.
4. Suspension
   Select Yes, No, or Unable to Determine to note whether the document includes any
language that indicates an employee who violates the policy may be subject to suspension from their job.

5. **Termination**
Select Yes, No, or Unable to Determine to note whether the document includes any language that indicates an employee who violates the policy may be subject to termination.

6. **Legal action**
Select Yes, No, or Unable to Determine to note whether the document includes any language that indicates an employee who violates the policy may be subject to legal action against the employee (not against the company/organization).

7. **Other consequence**
If the document lists any other possible consequences for violating the policy, select Yes. The coder can use the Open Text Entry column to describe the consequence(s), but it is not required. If no other information about consequences is included, select No.

**Section 9: Examples**
Examples are scenarios intended to help readers understand the policy. The coder should use the find feature (Ctrl+F on a PC) to search for the word “example.” However, the coder will need to read the entire policy in case it presents scenarios without using that term.

1. **Provides example of posting protected health information (PHI)**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to sharing of PHI on social media.

2. **Provides example of posting confidential/proprietary information**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to posting company confidential/proprietary information such as financial information or business plans on social media.

3. **Provides example of posting competitor information**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to posting about customers on social media.

4. **Provides example of posting “obscene” or “offensive” information**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to posting obscene or offensive content on social media.

5. **Provides example of posting “slurs” or “discriminatory” content**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to posting slurs or discriminatory content on social media.

6. **Provides example of posting “harassing” content**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to harassing other people, including other employees, on social media.

7. **Provides example of posting about supervisors or other employees on social media**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to posting about other employees, including supervisors or managers, on social media.

8. **Provides example of posting about patients/customers on social media**
Select Yes, No, or Unable to Determine to note whether the document includes a scenario/example pertaining to posting about patients or customers on social media, regardless of whether the information includes PHI.
9. Provides example of knowingly following/friending patients/customers on social media
Select Yes, No, or Unable to Determine to note whether the document includes a
scenario/example pertaining to posting about other employees, including supervisors or
managers, on social media.
10. Other examples
If the document includes any other examples/scenarios related to use of social media, select
Yes. The coder can use the Open Text Entry column to describe the example/scenario, but it
is not required. If no other examples/scenarios are included, select No.

Section 10: Other content
The coder should use the find feature (Ctrl+F on a PC) to search for key words related to this
content, such as “anonymous” and “forever.” However, the coder will need to read the entire
policy in case it presents these concepts without using the exact wording listed on the coding
sheet.

1. Mentions that content posted online could have a negative impact company/organization
   reputation
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   related to how social media posts may have a negative impact on the way the organization is
   perceived by patient, customers, or the general public.
2. Mentions that content posted anonymously is not truly anonymous
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   related to the fact that anonymous posts may be traceable back to the poster.
3. Mentions that content posted on social media lives forever
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   related to the fact that social media posts may be difficult or impossible to delete in the
   future. Any form of this statement would count as a Yes (ex: “what you post never goes
   away”).
4. Mentions that content posted on social media should be presumed visible, even if you think it
   is private
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   related to the fact that social media posts may be seen by an audience other than the audience
   originally intended for the post. Any form of this statement would count as a yes (ex: “post as
   if everyone you know reads or hears every word”)
5. Mentions this policy applies to channels and/or circumstances not mentioned specifically
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   that allows for the scope to include other channels/platforms/technology not specifically
   listed in the document.
6. Mentions that the policy applies to content you share, not just content you write
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   clarifying that the same principles/guidelines/rules apply to original content as well as
   content the employee shares that was created by someone else.
7. Mentions or recommends use of privacy settings to limit who can view posts
   Select Yes, No, or Unable to Determine to note whether the document includes any language
   suggesting that employees use privacy settings to limit or control the audience for their social
   media posts.
8. Says what to do if employee finds false or harmful information about the company/organization online
Select Yes, No, or Unable to Determine to note whether the document includes any language suggesting that employees notify someone if they see false, harmful, or libelous information posted about the company/organization on social media.

9. Provides contact information for questions
Select Yes, No, or Unable to Determine to note whether the document provides the name, contact information, or both for the person or department they should contact if they have questions about the policy.

Section 11: SCCT/SMMC models
1. Does any language in the document conflict with key principles of the SCCT and/or SMMC models?
Select Yes, No, or Unable to Determine to note whether any content in the document conflicts with these principles of the SCCT and/or SMMC communication models:
- Organization communicates directly with social media followers and creators
- Publics access content through social media as well as traditional media

The coder may use the Open Text Entry column to document specific language that conflicts with or aligns with these models, but it is not required.

Section 12: NLRB guidance
1. Does any language in the document conflict with guidance on social media policies issued by the National Labor Relations Board in May 2012?
Enter an “X” in the column under Yes, No, or Unable To Determine to note whether any content in the document conflicts with guidance issued by the National Labor Relations Board. Specifically, the NLRB is said employers should not do the following in their social media policies:
- Prohibit employees from discussing and disclosing information regarding their own conditions of employment
- Prohibit employees from discussing and disclosing information about the conditions of employment of employees other than themselves
- Threaten employees with discharge or criminal prosecution for failing to report unauthorized access to or misuse of confidential information
- Prohibit non-commercial use of the Employer’s logo or trademarks
- Advise employees to think carefully about “friend” co-workers
- Advise employees to report “any unusual or inappropriate internal social media activity”

The coder may use the Open Text Entry column to document specific language that conflicts with or aligns with these models, but it is not required.