

Policy Title	Media Policy: News Outlets and Social Media Platforms
Policy Number:	ADM 3.04
Department:	SOMI
Functional Area:	Dean of Enrollment Management
Contributing Department	
Approved by:	RHEI Leadership Team
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Manual	To be entered by Compliance360 System administrators or N/A if not in C360
Section	ADM 3

I. Mission, Vision and Values

This policy reflects our commitment to human dignity, integrity, compassion, stewardship, and service by guiding decisions and actions that uphold respect for all individuals and promote excellence in our work.

This policy aligns with our mission of extending the compassionate ministry of Jesus by improving the health and well-being of our communities and providing good help to those in need, especially the poor, dying, and underserved by ensuring that our practices support ethical, effective, and accountable service across all areas of the organization.

II. Policy

Media Policy: News Outlets and Social Media Platforms

III. Purpose

The purpose of this policy is to provide all students of SOMI with expectations and requirements for participation in any media, including news outlets that include but are not limited to television, radio, print, online news sources and social media networks and platforms.

IV. Scope

This policy applies to all students of SOMI. Students must follow the BSMH Social Media Use policy and BSMHC Public and Media Relations Guidelines.

V. Policy Details

On-Call Public and Media Relations Guidelines

Students of Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI), under the parent company Bon Secours Mercy Health (BSMH), are expected to fully adhere to the Media Policy. BSMH's first responsibility is patient care, dignity, and privacy. No student or associate should speak with a member of the media, on behalf of BSMH and any of its entities, without first having cleared it through the Public Relations (PR) department.

BSMH and all of its entities consider patient and associate information to be confidential, consistent with federal HIPAA laws. Requests for information by news media (television, radio, print, online, etc.) about their hospitals, facilities, patients, and associates are to be referred to the PR department.

All media (television, radio, print, online, etc.) inquiries or requests for information interviews, or photography/filming are to be directed to the PR team. A member of the PR team will collaborate with hospital, facility, or medical group leadership, and/or an appointed Subject Matter Expert, to ensure the most appropriate spokesperson is identified to speak with media.

Contact information for the PR department can be found here: <https://www.bonsecours.com/about-us/contact-us/newsroom>

Social Media Guidelines

Students of SOMI are expected to adhere to the following procedures when participating in any Social Media: (i) on School hosted sites; (ii) through SOMI equipment or networks; (iii) with respect to SOMI-related matters; and/or (iv) where a student's SOMI affiliation is somehow referenced, identified, or can be logically assumed based upon the site context or information provided. This Policy applies to use of Social Media both during and outside of school hours to the extent that any of (i)-(iv), above are implicated.

The health care industry, like many other industries, embraces the use of Social Media (as defined below) to facilitate and enhance communication, education, collaboration, research, and remote work, etc. However, the use of Social Media carries with it significant risks, including, but not limited to, privacy risks. These risks are lessened through establishing and complying with certain safeguards, policies, and guidelines; providing education and training; and taking appropriate corrective action when necessary. The intent of this policy is not to restrict the flow of useful and appropriate information or to interfere with students' legally protected rights, but to minimize risk to SOMI, students, and those we serve.

SOMI recognizes the value of online Social Media, when used properly, as resources to positively promote the organization's mission and values, strategic goals, marketing, referral, and recruitment activities, as well as a forum for exchange of information by its students. In fact, SOMI recognizes that the best form of marketing often comes from students who share with their communities how SOMI is living the promise of providing Good Help every day. For example, a well-written post from a member of the community or student about a SOMI-related community event, new program or service, or the extraordinary care that students have provided to patients, residents, and families (without disclosing PHI, as defined below) can have far greater effect than a paid TV commercial.

EXPECTATIONS

Use of Social Media

Prior to engaging in discussions on Social Media sites, students should consider the following:

Does the discussion conflict with SOMI's mission, culture, code of conduct (Student Rights and Responsibilities), and/or values?

Does the discussion reveal confidential patient information, including any information that could directly (e.g., name, Social Security number, address, etc.) or indirectly (e.g., provider name, date of birth, diagnosis, images, etc.) identify a patient under the care of the individual or organization?

Is the content an appropriate and professional reflection of a SOMI student?

Privacy and Security Compliance:

All uses, and disclosures of patient Protected Health Information via Social Media sites are prohibited.

Respecting Copyright Laws: Students may not post content or conduct any activity that fails to conform to all applicable state and federal copyright and trademark laws. It is critical that students ensure that they have documented permission to use or reproduce any copyrighted text, photos, graphics, video, music, or other material owned by others. This applies to the use of SOMI trademarks, names, and logos.

In conjunction with the provisions of this Policy, students must follow the "Common Sense Guidelines."

Common Sense Guidelines

- Don't assume Social Media posts are private: Even though there are privacy controls on sites such as Facebook and other Social Media sites, students should assume that anything posted on a website is seen by the general public, as well as by SOMI. It is important to keep in mind that:
- "Friends" can copy your posts and make them available in public: Your friends may include patients/residents. It is easy for your privacy settings to be set to something other than what you had planned.
- Don't jeopardize your reputation and/or future employment opportunities: Students must consider that everything they post online is part of a lifetime record of him or herself. Increasingly, employers search the online history.
- Keep in mind potential implications from posting: Recognize that student use of Social Media can result in members of the public forming opinions about SOMI and its services, employees, or students.
- Comply with applicable law: Students may not engage in any activity that violates federal, state or local laws.
- Use this policy as a helpful resource: Consult the policy, as necessary, prior to posting or engaging in activity that could amount to a violation.

Monitoring and Oversight

Corrective and/or disciplinary action for violations:

Speaking to News Outlets without prior approval or the inappropriate use of Social Media by SOMI students is subject to corrective and/or disciplinary action, up to and including dismissal, consistent with SOMI policies and procedures. Refer to Student Conduct – Rights and Responsibilities policy. Though not intended for a comprehensive list of prohibited activities, SOMI notes the following activities with respect to the use of Social Media that may be inappropriate and therefore prohibited for students:

- Being interviewed by or providing written information to a News Outlet about Bon Secours Mercy Health (print, website, TV/Radio, online etc.) without approval from the BSMH Public Relations department.
- Speaking “off the record” on behalf of SOMI or BSMH to News Outlets on any matter pertaining to the organization.
- Using Social Media in a way (e.g., posting information) that conflicts with or violates SOMI’s mission, values, code of conduct, or policies and procedures.
- Posting or sharing any copyrighted or trademarked information or property where appropriate permission has not been granted and recorded, including trademarks, names, and logos of BSMH and/or SOMI.
- Compromising the privacy and security of confidential patient health or property business information about BSMH, its affiliates, patients, vendors, or suppliers, including, without limitation, business and financial information. (Note: inappropriate use or disclosure of patient health information may also be subject to fines, legal proceedings, and/or criminal charges in addition to any corrective and/or disciplinary actions taken by SOMI).
- Engaging in any form of harassment, including derogatory or inflammatory remarks about an individual's race, religion, color, gender, age, marital status, national origin, sexual orientation, veteran status, disability, or any other characteristic protected by law.
- Posting or sharing material that is obscene, defamatory, profane, libelous, threatening, harassing, or abusive to another person or entity (including SOMI) that is not otherwise protected by law.

Rights of St. Mary's School of Medical Imaging

SOMI reserves the right to reject or remove comments for any reason at any time from SOMI Social Media sites, including, but not limited to, its belief that any comment violates the Policy, and to determine in its sole discretion which submissions meet its qualifications for posting.

In addition to other forms of disciplinary action, SOMI reserves the right to ban future posts from people who repeatedly violate this Policy.

SOMI reserves the right to amend these guidelines at its discretion to address issues or changes that may arise.

Acknowledgements:

Aspects of this policy are based on BSMH Public and Media Relations Guidelines and the BSMH Social Media Use Policy and Guidelines.

VI. Definitions

Blog

Short for “web log,” a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.

News Outlets

Are broadcasting channels that provide news and information to the public. These channels can include print, TV, radio, internet, and social media platforms.

Personally Identifiable Information (PII)

PII is any information that permits the identity of an individual to be directly or indirectly inferred, including any other information that is linked or linkable to that individual.

Protected Health Information (PHI)

PHI is individually identifiable information (including, but not limited to, names, dates, medical diagnosis, phone numbers, fax numbers, medical records numbers, and social security numbers) about a patient/resident's physical or mental health status, the provision of health care to a patient/resident, or payment for that care.

Podcast

A collection of digital media files distributed over the internet, often using syndication feeds, for playback on portable media players and personal computers.

RSS feeds or Syndication feeds

A family of different formats used to publish updated content such as blog entries, news headlines or podcasts and “feed” this information to subscribers via email or by an RSS reader. This enables users to keep up with their favorite websites in an automated manner that is easier than checking them manually (RSS known as “really simple syndication”).

Social Media

Includes but is not limited to blogs, podcasts, discussion forums, online collaborative information, developing technologies, and publishing systems that are accessible to internal and external audiences (e.g., wikis, RSS feeds, video sharing, and any social media networks and platforms such as Facebook, Instagram, Snapchat, Twitter, Pinterest, YouTube, LinkedIn, TikTok, etc.).

Wiki

Allows users to create, edit, and link webpages easily; often used to create collaborative websites (called “Wikis”) and to power community websites.

VII. Attachments

N/A

VIII. Related Policies and Procedures

ADM 3.05 Student Conduct – Rights and Responsibilities

IX. Regulatory Notices

Nothing in this policy creates a contractual relationship between Bon Secours St. Mary's Hospital School of Medical Imaging (SOMI), a department owned and controlled by Bon Secours St. Mary's Hospital of Richmond, LLC, and any party. SOMI, in its sole discretion, reserves the right to amend, terminate or discontinue this policy at any time, with or without advance notice.

X. Version Control

Version	Effective Date	Next Review Date	Description	Supersedes, if applicable	Prepared By
1.0	8/15/2015	N/A	Original Policy	N/A	Unknown
2.0	6/15/2023	N/A	Revisions	1.0	Dean of Student Affairs
2.1	5/7/2024	5/7/2028	Revisions – Definitions & Narrative Language	2.0	Dean of Student Affairs
1	5/7/2024	5/7/2028	Version changed – BSMH Template Adopted/Ownership Change	2.0	Dean of Enrollment Management

This policy/procedure/guideline is not intended to establish a standard of clinical or non-clinical care or practice. Rather, this policy/procedure/guideline creates a general tool to help guide decision-making with the understanding that different action(s) may be necessary in response to the totality of the circumstances presented.

Sites revised 05/06/2025- Bon Secours Mercy Health adopts the above policy, procedure, policy & procedure, guideline, manual / reference guide / instructions, or principle / standard / guidance document for all Bon Secours Mercy Health entities including, but not limited to, facilities doing business as Mercy Health – St. Vincent Medical Center, St. Vincent – St. Charles Hospital, St. Vincent – St. Anne Hospital, Mercy Health – Perrysburg Medical Center, Mercy Health – Tiffin Hospital, Mercy Health – Willard

Hospital, Mercy Health – Defiance Hospital, Mercy Health Allen Hospital LLC, Mercy Health - Lorain Hospital, Mercy Health St. Elizabeth Youngstown Hospital, Mercy Health St. Joseph Warren Hospital, Mercy Health - St. Elizabeth Boardman Hospital, Mercy Health - St. Rita's Medical Center, Mercy Health – Springfield Regional Medical Center, Mercy Health - Urbana Hospital, Mercy Health - Anderson Hospital, Mercy Health - Clermont Hospital, Mercy Health – Fairfield Hospital, Mercy Health - West Hospital, The Jewish Hospital – Mercy Health, Mercy Health – Kings Mills Hospital, LLC, Mercy Health - Lourdes Hospital LLC, Mercy Health – Marcum and Wallace Hospital, Chesapeake Hospital Corporation DBA Rappahannock General, Maryview Hospital, Bon Secours Richmond Community, Bon Secours Memorial Regional Medical Center, Bon Secours – St. Mary's Hospital, Bon Secours St. Francis Health System, Bon Secours St. Francis Medical Center, Bon Secours Mary Immaculate Hospital, Bon Secours - Southside Medical Center, Bon Secours Mercy Health Franklin, LLC, Southern Virginia Medical Center, and Bon Secours Harbour View Medical Center. This also may apply to Bon Secours Mercy Health Medical Group LLC and its medical group affiliates.