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presents

Social Media, Healthcare and the Law *Developing A Social Media Policy*

BEACON Communities
Affinity Work Group for Security & Privacy
May 13, 2011

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OUTLINE

1. Social Media
 - description
 - importance
 - examples of issues
2. Legal Issues
 - privacy
 - other legal issues
3. Crafting a Social Media Policy
 - things to consider and example

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WHAT IS SOCIAL MEDIA?


- A method of communication
- Create and disseminate ideas and information
 - Instant
 - Efficient
 - Low Cost (Mayo Clinic spent \$1500)
 - User-generated content
 - Collaborative
 - No degree required, everyone is an expert
 - Anyone can make a difference



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SOME EXAMPLES

- Facebook
- Twitter
- YouTube
- Medscape (from WebMD)
- Sermo
- Healthy Place (for mental health)
- Patients Like Me



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WHY DOES SOCIAL MEDIA MATTER?

- **Facebook** (FaceBook Statistics)
 - More than 500 million active users
 - Average user has 130 "friends"
 - People spend *over 700 billion minutes per month* on Facebook
 - \$1.86 Billion in ad revenue in 2010
- **Twitter** (Sharon Gaudin Computer World 2010)
 - More than 75 million users
 - About 6.2 million new users per month

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WHY DOES SOCIAL MEDIA MATTER?

- **Patients Like Me** (Health 2.0 Conference Our Speakers 2010)
 - More than 45,000 users
 - Patients voluntarily revealing protected health information
 - Tracking 19 diseases

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WHY DOES SOCIAL MEDIA MATTER?

- **TuAnalyze** (Children's Hospital Boston 2011)
 - Social network for diabetic patients
 - Volunteered data for public health surveillance project, sharing data about their hemoglobin A1c (or A1c) status
 - Among all TuAnalyze users, 81.4% chose to share their A1c data in aggregate, while 34.1% also chose to display their personal A1c data on their TuDiabetes profile

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WHY DOES SOCIAL MEDIA MATTER?

- Patients want to be in control
 - 61% of American adults look online for health information (Pew Internet & American Life Project, The Social Life of Health Information, 2009)
- Peer professionals want to share
- Everyone wants to participate



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WHY DOES SOCIAL MEDIA MATTER?

- Easy**
- + Fast**
- + Popular**
- = Lots of Potential for TROUBLE**

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EXAMPLES OF TROUBLE

- **Federal Prosecution** (AG's Office, WD Penn.)
 - Pennsylvania
 - UPMC Shadyside Hospital
 - Employee selling PHI for personal gain (names, birth dates, social security numbers)
 - 14 count indictment (HIPAA and SSA)
 - Possible punishment: 80 years, \$4,730,000 or both

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EXAMPLES OF TROUBLE

- **Federal Prosecution**
 - In 2004, employee of Seattle Cancer Care Alliance pled guilty to HIPAA violations – 16 months in prison
 - Used patient data to obtain credit cards, incurred \$9,139.42 in debts for items such as video games, clothes, and jewelry
 - Notice that this was not PHI but credit card data

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EXAMPLES OF TROUBLE

➤ Federal Prosecution - 2004 case cont.

a person who knowingly, *and in violation of HIPAA*, discloses individually identifiable health information to another person with intent to "sell, transfer, or use individually identifiable health information for commercial advantage, personal gain, or malicious harm" U.S.C. § 1320d-6(a)(3) and (b)(3)

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EXAMPLES OF TROUBLE

➤ Actions by HHS

- On Feb. 22, 2011
 - Cignet Health of Maryland
 - **Violated** HIPAA's Privacy Rule
 - Imposed a \$4.3 Million Civil Money Penalty (penalty increased due to HITECH)
 - Violating the rights of 41 patients = \$1.3 Mil.
 - Ignoring HHS = \$3 Mil.

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EXAMPLES OF TROUBLE

➤ Actions by HHS

- On Feb. 24, 2011
 - General Hospital Corp. and Mass. General Physicians Organization, Inc. of Mass.
 - **Settled potential violations** of HIPAA's Privacy Rule
 - Settled for \$1 Mil.
 - Lost data of 192 patients

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EXAMPLES OF TROUBLE

➤ Actions by HHS

- On Feb. 24, 2011 cont.
 - "failed to implement reasonable, appropriate safeguards to protect the privacy of PHI *when removed* from Mass General's premises and impermissibly disclosed PHI potentially violating provisions of the HIPAA Privacy Rule"

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EXAMPLES OF TROUBLE

➤ Actions by HHS

- On Feb. 24, 2011 cont.
 - "A robust compliance program includes employee training, vigilant implementation of policies and procedures, regular internal audits, and a prompt action plan to respond to incidents."

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EXAMPLES OF TROUBLE

➤ Minnesota (Star Tribune, May 6 2011)

- Two Allina Hospitals fired 32 employees
- Privacy violations - accessed patients' EHR without a legitimate medical reason
- Hospital has a zero-tolerance policy
- Employees allegedly snooped on EHRs of people who overdosed at a party in March
- Hospital checked because the drug overdose matter was a "high-profile case"

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EXAMPLES OF TROUBLE

- **Rhode Island** (Boston Globe April 2011)
 - Westerly Hospital fired doctor for posting information about a patient on her Facebook account
 - Reprimanded by the Rhode Island Medical Board for "unprofessional conduct"
 - Did not mention name, but Board concluded revealed enough for others to identify the patient

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EXAMPLES OF TROUBLE

- **Michigan** (WJBK Fox 2 Detroit 2010)
 - Oakwood Hospital fired nurse for post on Facebook
 - Posted that she came face-to-face with a cop killer patient and hoped he would rot in hell
 - Did not mention the patient's name, but enough PHI to violate HIPAA? (maybe)

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EXAMPLES OF TROUBLE

- **Mississippi** (WLBT 3, Dec. 2009)
 - *Governor tweeted:* "Glad the Legislature recognizes our dire fiscal situation. Look forward to hearing their ideas on how to trim expenses."
 - *Nurse tweeted back:* "Schedule regular medical exams like everyone else instead of paying UMC employees overtime to do it when clinics are usually closed."
 - **Problem:** Nurse *indirectly* referenced PHI because she *tweeted back* to the Governor

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EXAMPLES OF TROUBLE

- **University of Louisville** (April 8 2011)
 - Dismissed nursing student from its program after she made unflattering remarks on her MySpace page after watching a live birth
 - Based on violating its Honor Code and the course's confidentiality agreement
 - The student sued alleging First (free speech) and Fourteenth (due process) Amendment violations
 - She won on summary judgment
 - The decision was reversed on appeal and remanded to the District Court

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WHAT'S REALLY THE PROBLEM?

- **Blurring of the lines between professional and personal**
 - People do not consider the potential impact of their communications (ignorance is not bliss)
 - Personal opinion v. professional advice
 - Eric Schmidt, CEO of Google, prediction to the WSJ
- **Once you send, you CAN'T UNSEND**
 - WayBackMachine - <http://www.archive.org>

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WHAT ABOUT THE GOOD?

- **Hospitals sharing information** – as of May 2011, hospitals accounted for:
 - 486 YouTube channels (compared to 398 in August 2010)
 - 777 Facebook pages (compared to 631 in August 2010)
 - 714 Twitter accounts (compared to 634 in August 2010)
 - 120 Blogs (compared to 87 in August 2010)
- Good for patients because they can stay informed, have more control over their own healthcare and learn from *actual* experts

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WHAT ABOUT THE GOOD?

➤ HHS:

- Variety of divisions have
 - YouTube Channels, *see list at* <http://newmedia.hhs.gov/tools/youtube.html>
 - Twitter accounts, *see list at* <http://newmedia.hhs.gov/tools/twitter.html>
 - Flickr accounts, *see list at* <http://newmedia.hhs.gov/tools/flickr.html>

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LEGAL ISSUES WITH SOCIAL MEDIA

Privacy



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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- State and Federal Laws
 - Strict privacy requirements and related data security laws and regulations
 - Revealing that the person is a patient is itself a problem
 - Limits your ability to respond to others online because you would be disclosing PHI

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

➤ HIPAA/HITECH

- Privacy Rule
- Keep protected health information secure
- Disclosure allowed under certain defined circumstances
- **HIPAA currently under revision, stay tuned**

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

➤ HITECH Breach (HHS and FTC)

- "the **unauthorized** acquisition, access, use, or **disclosure** of protected health information which **compromises** the **security or privacy** of such information, **except** where an unauthorized person to whom such information is disclosed would **not** reasonably have been able to **retain** such information"
- If posted online, **retained** for a very long time
- Not covered by any of the breach exceptions

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- HITECH Breach (HHS and FTC) –
Who is under Obligations?
 - Covered Entity
 - Business Associate
 - Subcontractor Requirements

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- HITECH Breach (HHS and FTC) –
What are you required to do?
 - Required to investigate
 - Required to give notice
 - Required to reprimand
 - Required to record/notify Secretary

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- **Investigation and Notice**
 - CEs must provide notification (where warranted) "without unreasonable delay" but in no event longer than 60 days after a breach is "discovered"
 - A breach is **discovered** when it is **known**, or by exercise of reasonable diligence, would have been known *by a member of the covered entity's workforce*
 - People in your workforce who spot a breach on another employee's site start the clock running

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- State AG's have power to enforce HITECH breach provisions
 - Connecticut AG first to file, settled with HealthNet for \$250,000 + compliance
 - Vermont AG entered into a consent decree with HealthNet; requires payment of \$55,000 and to submit to a data-security audit, and file reports with Vermont regarding information security programs for 2 years

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- State AG's have power to enforce breach provisions under state law
 - Indiana AG sued WellPoint under Indiana state law which requires notification "without unreasonable delay"
 - Failed to notify their customers or the AG's office in a timely manner following a data breach affecting more than 32,000 Hoosiers
 - Seeks \$300,000 in civil penalties

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- State AG's have power to enforce breach provisions under state law
 - WellPoint notified as early as February 22, 2010 and again on March 8, 2010 that PHI publicly available online
 - WellPoint did not begin notifying customers until June 18, 2010 (over 100 days after reportedly learned of breach)
 - AG's office notified on July 30, 2010

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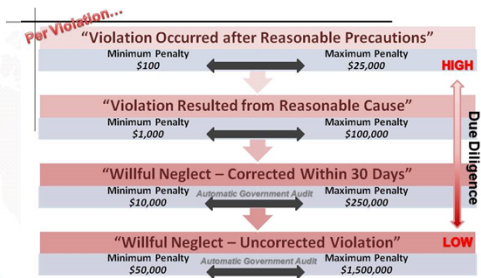
LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- If employee violates a patient's privacy **the medical facility can be liable**
 - *Yath v. Fairview Clinics*, MN Ct. of App.
 - HIPAA *does not* preempt state law causes of action
 - Patient could sue clinic and medical assistant who snooped
 - Minnesota statute prohibiting wrongful disclosure of health records

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HITECH ACT PENALTIES: PRIVACY



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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- High stakes if employees violate patient's privacy
 - Liability under HIPAA and state laws, including criminal liability (meaning jail time)
 - PR problems
 - \$\$\$

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- Some of the Applicable Indiana Laws
 - Health Records, IC 16-39 *et seq.*
 - Health Records and Identifying Information Protection, Act No. 356
- **Additional Resource:**
Indiana Health Coverage Programs –
<http://provider.indianamedicaid.com/general-provider-services/provider-education.aspx>

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- Some of the Applicable Maine Laws
 - Confidentiality of Health Care Information, 22 M.R.S.A. § 1711-C
 - Mental Health, Confidentiality of Information, 34-B M.R.S.A. § 1207
- **Additional Resource:**
Medical Mutual Insurance Co. of Maine –
<http://www.medicalmutual.com/resources/hipaa.php>
(forms and checklists)
Office of the Maine Attorney General
http://www.maine.gov/ag/health_issues/medical_privacy.shtml

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- Some of the Applicable Michigan Laws
 - Mental Health Code, Act 258 of 1974, MCL 330.1001 *et seq.*
 - Michigan Medical Records Access Act, Act 47 of 2004, MCL 333.26261 *et seq.*
- **Additional Resource:**
Michigan Bar, Healthcare Law Section –
<http://www.michbar.org/healthhcresources.cfm>

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- Some of the Applicable New York Laws
 - Rights of Patients in Certain Medical Facilities, Public Health Law § 2803-C
 - Patient Privacy, Public Health Law § 2997
- **Additional Resource:**
 - Stony Brook University Medical Center – <http://www.stonybrookmedicalcenter.org/patientcare/hipaaresource>
 - University at Buffalo, Health Sciences Library - <http://library.buffalo.edu/hsl/resources/guides/hipaa.html>

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- Some of the Applicable Oklahoma Laws
 - Mental Health, Title 43A
 - Torts, Title 76 (see section 76-19, which provides access to medical records)
- **Additional Resource:**
 - Oklahoma Department of Health – http://www.ok.gov/health/Organization/HIPAA_Privacy_Rules/

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LEGAL ISSUES WITH SOCIAL MEDIA: PRIVACY

- Some of the Applicable Hawaii Laws
 - Rights of Recipients of Mental Health Services, Ch. 334E
 - Privacy of Health Care Information--**Repealed**, Ch. 323 (enacted in 1999, made effective in July 1, 2001, *repealed on* June 30, 2001)

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LEGAL ISSUES WITH SOCIAL MEDIA

Other Legal Issues



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LEGAL ISSUES WITH SOCIAL MEDIA: OTHER LEGAL RISKS

- Discrimination
- Harassment
- Stored Communications Act of 1986
 - Violation to gain unauthorized access
 - Employees with "private" pages

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LEGAL ISSUES WITH SOCIAL MEDIA: OTHER LEGAL RISKS

- Negligence / Malpractice
- Defamation
- Intellectual property infringement
- Afterhours work by nonexempt employees
- FTC Endorsement Guidelines

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LEGAL ISSUES WITH SOCIAL MEDIA: OTHER LEGAL RISKS

- **Malpractice**
 - Is tweeting during a medical procedure negligence?
- **Litigation**
 - Tweets discoverable
 - Facebook posts discoverable (probably)

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LEGAL ISSUES WITH SOCIAL MEDIA: OTHER LEGAL RISKS

- **Labor Issues**
 - Boss "friending" or "following" subordinate
 - Harassment
 - Discrimination – evidence of favoritism
 - Wrongful termination

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WHY HAVE A SOCIAL MEDIA POLICY?

- To protect your patients' rights
- To instill professionalism throughout your enterprise
- To protect your *organization* from liability
- To protect your *employees* from liability

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WHY HAVE A SOCIAL MEDIA POLICY?

- If the organization *does not know* that employees are posting PHI but knows of the popularity of social networking websites and that its employees use such websites
 - Under Proposed HIPAA changes – *may be* "willful neglect" if no policies and procedures in place
 - In the HIPAA *proposed* rule, HHS focused on lack of policies and procedures

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WHY HAVE A SOCIAL MEDIA POLICY?

- **Rogue employee defense**
 - Can shield employers from liability to the extent the conduct occurred in spite of and contrary to reasonable safeguards, including documented *training*

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WHY HAVE A SOCIAL MEDIA POLICY?

- **Will not work if**
 - Cannot demonstrate a strict policy
 - Cannot demonstrate training structure designed to prevent the "rogue" conduct

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FORMULATING A SOCIAL MEDIA POLICY

- What is your stance?
 - Does your organization want to allow the use of social media? If so, with whose "tools"?
 - Allow use only under certain circumstances?
- Review current communications policies and procedures
 - Can generally be modified to address social media
 - Good opportunity to review all policies

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FORMULATING A SOCIAL MEDIA POLICY

- Focus on what employees can do
 - Be transparent and authentic
 - Be responsible for what you write
 - Protected PHI and proprietary information
 - Use common sense and common courtesy
 - Think twice before you hit post!

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FORMULATING A SOCIAL MEDIA POLICY

- Be consistent with your policies
- Enforce your policies – having policies will not help if they are not properly enforced
- Review policies periodically
- **EMPLOYEES MUST BE AWARE OF POLICIES AND RAMIFICATIONS OF VIOLATIONS**

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FORMULATING A SOCIAL MEDIA POLICY

- Policy must comply with the National Labor Relations Act
 - Enacted to protect employees' rights to collective bargaining
 - Employees are allowed to discuss the conditions of their employment including their
 - wages
 - hours and
 - working conditions

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FORMULATING A SOCIAL MEDIA POLICY

- Policy must comply with the National Labor Relations Act
 - No right to:
 - Make untrue statements
 - Disloyal statements to damage a company's reputation

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FORMULATING A SOCIAL MEDIA POLICY

- National Labor Relations Board
 - Brought case against American Medical Response of Connecticut, Inc., in October 2010, after AMRC fired an employee for making comments about a supervisor on her Facebook page
 - NLRB alleged that the discharge violated federal labor law because the employee was engaging in protected activity

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FORMULATING A SOCIAL MEDIA POLICY

- National Labor Relations Board
 - Also alleged that AMRC maintained overly-broad rules in its employee handbook regarding blogging, Internet posting, and communications between employees
 - Case settled in February of 2011

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FORMULATING A SOCIAL MEDIA POLICY

- National Labor Relations Board
 - In early April, NLRB advised Thompson Reuters that it plans to file a civil complaint
 - The NLRB is alleging the company illegally reprimanded a reporter over a public Twitter posting she had sent criticizing management
"One way to make this the best place to work is to deal honestly with Guild members."

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POLICY EXAMPLE: KAISER PERMANENTE

- Statement
- Purpose
- Scope
- Definitions
- Hosted Sites / Non-Hosted Sites
- Blogging Best Practices
 - If allow comments, see the Mayo Clinic comments policy
- Other considerations
 - Facebook
 - Twitter
 - Off Hours Discussions
 - Discussing Patients
 - Discussing Work
- Regulatory Audit
- Enforcement
- Training

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OTHER POLICY EXAMPLES

- Mayo Clinic
 - Participation Guidelines for the Public – Basic rules of the road for blogs, etc. - <http://sharing.mayoclinic.org/guidelines/>
 - Comments Policy – How the Mayo Clinic handles submitted comments - <http://www.mayoclinic.org/blogs/comment.html>
 - Guidelines for Employees & Code of Ethics - <http://sharing.mayoclinic.org/guidelines/for-mayo-clinic-employees/>
- Vanderbilt University Medical Center
 - Social Media Toolkit
<http://www.mc.vanderbilt.edu/root/vumc.php?site=socialmediatoolkit>

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OTHER POLICY EXAMPLES

- Social Media Governance
 - <http://socialmediagovernance.com/policies.php>
 - 174 Policies available

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