

DICKINSON WRIGHT PLLC 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

➤ 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

➤ 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

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: PIRACY

➤ 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/health/hcresources.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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