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Author Elizabeth Van Vuren: HUMAN RESOURCES BUSINESS PARTNER
Area Human Resources
Applicability Aspirus System Wide
References ALH Orientation, Template: Policy

Social Media/Networking Policy

SCOPE:

- System Wide

STAKEHOLDERS:

- All persons employed and non-employed who have access to Aspirus systems or patient information such as students, volunteers, and affiliate staff.

PURPOSE:

The purpose of this policy is to provide requirements for participation in social media, including Aspirus hosted social media, and in non-Aspirus social media in which one's identity and/or affiliation with Aspirus is known, identified or presumed. This policy is not intended to interfere with rights under the National Labor Relations Act or to prohibit employees from discussing terms and conditions of employment.

ABBREVIATIONS:

- HIPAA: Health Insurance Portability and Accountability Act

DEFINITIONS:

- **Social Media:** Any form of website or application serving a function to communicate, post information and content, or interact with others. These include but are not limited to, blogs, vlogs, social networking sites, and chat rooms. Examples include: Facebook, TikTok, YouTube, X (formerly Twitter), Instagram, LinkedIn, and Caring Bridge.
- **Proprietary Information:** All trade secrets and confidential information are proprietary as is other information created or owned by Aspirus.
- **Confidential Information:** Includes trade secrets, marketing strategy, business strategy, and sensitive information which needs to be protected or other similar information that has not been publicly released by Aspirus.

POLICY:

1. General Provisions:

- A. The absence of or lack of explicit reference to a specific site(s) does not limit the extent of the application of this policy. Where no policy or guideline exists, employees should use their professional judgment and take the most prudent action possible.
- B. Guidelines for Personal Social Networking:
 - **Follow all applicable Aspirus confidentiality policies.** Employees are not to share confidential or proprietary information about Aspirus and are to maintain patient and resident privacy. This also applies to comments posted on other blogs, forums, and social networking sites. Employees are not to post pictures or any information specific to a patient, even if the patient is not identified by name. If a patient could be reasonably identified using the information posted, it would constitute a HIPAA violation and is against Aspirus policy. In addition to this policy, HIPAA and other privacy laws, and individual professional licensing board standards may govern an employee's social media activities, which may affect their license eligibility. Confidential information about Aspirus, as discussed in the Aspirus Code of Conduct, includes patient lists and clinical information, pricing data, and cost data. It also includes, but is not limited to, information pertaining to acquisitions, divestitures, affiliations, and mergers; financial data; research data; strategic plans; marketing strategies; techniques; supplier and contractor information; training materials; and proprietary computer software.
 - **Properly identify yourself.** Where an employee's connection to Aspirus is apparent, he or she needs to make it clear that he or she is speaking for himself or herself and not on behalf of Aspirus. It is recommended that the employee include this disclaimer: "The views expressed on this [blog; website] are my own and do not reflect the views of my employer." Consider adding this language in an "About me" section of the blog or social networking profile. The use of Aspirus copyrighted logos, trademarks, and intellectual property (which includes those of affiliated organizations) is not allowed without written permission.
 - **Be careful.** Employees need to remember that what they post will be around for a

long time, so they need to consider the content of their posting carefully and be cautious in disclosing personal details.

- **Be respectful.** Employees are not to use blogs or personal Web sites to harass, bully, or intimidate other employees or patients. Behaviors that constitute harassment and bullying include, but are not limited to, comments that are derogatory with respect to age, ancestry, national origin, race, religion, gender, sexual orientation, marital status, color, or disability; sexually suggestive, humiliating, or demeaning comments; and threats to stalk, haze, or physically injure another employee or patient.
- **Do not interfere with work commitments and job duties.** Social media activities should not interfere with work commitments and job duties. Do not use work email addresses to register on social networks, blogs or other online tools utilized for personal use.
- **Professional Boundaries.** Employees must maintain professional boundaries between their personal and professional interactions. Staff who have patient interactions should not search, follow, initiate or accept social media requests from a patient or patients family member except in unusual circumstances such as a situation where a friendship predates the patient care relationship or a relationship exists completely independent of the association with Aspirus.
- Employees and patients are our best ambassadors and are encouraged to share their Aspirus story. When doing so, Aspirus expects its employees to follow the Aspirus Code of Conduct and to make it clear that they are speaking in their personal capacity, not on behalf of Aspirus.

2. Guidelines for Official Aspirus Participation:

- A. Employees should not speak to the media on Aspirus' behalf without contacting their designated Marketing representative. All media inquiries should be directed to them.
 - Any establishment of external sites representing Aspirus or social media participation on behalf of Aspirus is to be pre-approved and coordinated by the designated Marketing representative. All use of external websites for work-related purposes (such as photo sharing through Flickr.com, video sharing through youtube.com, and blogging through websites or twitter.com) are to be pre-approved.
 - Social networking activities on behalf of Aspirus are to comply with all Aspirus policies and guidelines.
 - All uses and disclosures of patient identifying information shall be carried out in a manner compliant with applicable patient privacy policies, regulations, and standards. In order to share patient identifying information or images through social media and blogs, the individual responsible for sharing that information shall obtain a written authorization for the use and disclosure of the information from the patient or resident and their legal representative and the written approval of the designated Marketing representative.
- B. Aspirus has the right to search and monitor social media exposure. Human Resources will be notified of any risks or concerns identified. All internet traffic is monitored by Information Systems. To ensure compliance with Aspirus internal policies, applicable laws and regulations

and to ensure employee safety, Human Resources may permit the inspection, monitoring and disclosure of such traffic.

- C. Information Systems reserves the right to remove any inappropriate files or program files found on an employee's computer system or stored in their home directory on the network without prior notification. Any such incident will be documented and the employee's supervisor/manager notified.
- D. Any employee found to be in violation of any portion of this employee Social Media/ Networking policy will be subject to immediate corrective action, up to and including termination of employment. Inappropriate disclosure of patient or resident information may also result in civil and criminal penalties for patient privacy breach.
- E. Employees who become aware of violations of this policy are to bring such information to their Supervisor, Human Resources, or Compliance as appropriate. Aspirus prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any employee who retaliates against another employee for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to corrective action, up to and including termination.
- F. Aspirus will not be responsible for any employee posting on any unapproved social media site. Employees are responsible for reading, knowing and complying with the Terms of Service of the sites they use. Questions concerning this policy should be brought to the attention of Human Resources.

REFERENCES:

1. Code of Conduct (System Wide)
2. Confidentiality Policy (System Wide)
3. HIPAA
4. Corrective Action (System Wide)
5. Internet, E-mail, and Voicemail Use Policy (System Wide)
6. Use of Personal / Company Provided Electronic Devices Policy (System Wide)

SUPPORTING DOCUMENTS:

- None

ADDENDUM:

- None

COMMITTEE APPROVALS:

- None

Approval Signatures

Step Description	Approver	Date
HR System Policy Committee Chair	Julie Weiks: SENIOR HUMAN RESOURCES BUSINESS PARTNER	12/2025
Policy Owner	Elizabeth Van Vuren: HUMAN RESOURCES BUSINESS PARTNER	12/2025

Applicability

Aspirus Chippewa Falls Hospital, Aspirus Divine Savior Hospital, Aspirus Eagle River Hospital, Aspirus Iron River Hospital, Aspirus Ironwood Hospital, Aspirus Keweenaw Hospital, Aspirus Lake View Hospital, Aspirus Langlade Hospital, Aspirus Medford Hospital, Aspirus Medical Group Inc., Aspirus Merrill Hospital, Aspirus Post Acute Care/MedEvac, Aspirus Rhinelander Hospital, Aspirus St. Luke's Hospital, Aspirus Stanley Hospital, Aspirus Stevens Point Hospital, Aspirus Tomahawk Hospital, Aspirus Wausau Hospital, Aspirus Wisconsin Rapids Hospital, Aspirus, Inc., Howard Young Medical Center

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