Status **Active** PolicyStat ID **19191701**

Origination	09/2010
Last Approved	10/2025
Effective	10/2025
Last Revised	10/2025
Next Review	10/2028
Owner	Maggie Wolff: SVP Chief of Staff
Area	Administration
Applicability	INTEGRIS Health System Wide

Social Media Policy, SYS-ADM-704

COPY

1. PURPOSE

The purpose of this policy is to provide INTEGRIS Health caregivers, trainees, volunteers, and contractors ("Users") with standards for acceptable use of all social media sites, blogs, wikis, forums, and groups (e.g., Facebook, LinkedIn, Twitter, Instagram, SnapChat, YouTube and similar types of online forums), including INTEGRIS Health hosted social media and non-INTEGRIS Health hosted social media in which the User's INTEGRIS Health affiliation is known or identified.

2. POLICY

A. It is the policy of INTEGRIS Health to comply with applicable federal and state laws concerning social media, internet, and intranet usage, specifically including federal and state patient privacy laws.

B. It is the intent of INTEGRIS Health to interpret and enforce this Policy in a manner that will not interfere with employees' rights to discuss work-related issues with one another. Notwithstanding any provision of this Policy that could suggest a contrary application, nothing in this policy will be interpreted to limit or interfere with an individual's rights to discuss the terms and conditions of their employment or other rights under Section 7 of the National Labor Relations Act.

C. Users should be aware that they are legally responsible for all postings from their account, and may face personal liability if such postings are defamatory, harassing, or in violation of any other applicable law or if the postings include confidential, privileged, proprietary or copyrighted information (written, audio, video and all other electronic forms) or other intellectual property belonging to INTEGRIS Health or other third parties.

D. All INTEGRIS Health caregivers are expected to conduct online interactions in alignment with

our iCARE Values—Integrity, Compassion, Accountability, Respect, and Excellence and the INTEGRIS Health Code of Ethical Business Conduct. This means upholding the same standards of ethical conduct, confidentiality and professionalism online as we do in person, in accordance with INTEGRIS Health policies. As representatives of INTEGRIS Health, both at work and at home, we must remain mindful that our professional and personal online interactions reflect on INTEGRIS Health and the trust placed in us by our patients, caregivers and community.

3. SCOPE

A. This policy shall apply to all INTEGRIS Health caregivers and all organizations and personnel (e.g., employees, independent contractors, vendors, volunteers, etc.) of INTEGRIS Health and specifically the CMS Providers and entities indicated in the Applicability section.

B. It applies to the use of social media during work and non-work time, when the person's affiliation with INTEGRIS Health is identified, known or presumed.

4. PROCEDURES

A. **General Terms Applicable to all Social Media Sites**.

1. Communications must not contain any sensitive, confidential, privileged, proprietary, copyright, trade-secret or patient information or images (i) of INTEGRIS Health, other than what is publicly available in INTEGRIS Health press releases or social media sites; or (ii) of any third party.
2. Communications should not contain language that is obscene, defamatory, profane, libelous, threatening, harassing, or abusive to another person or entity.
3. Communications must not contain any content that is protected health information, or be used to provide medical advice, medical commentary by non-physicians or to make, recommend or increase referrals to physicians.
4. Communications must not be used to recruit subjects for clinical research trials, unless the recruitment has been specifically approved by an INTEGRIS Health Institutional Review Board.
5. Communication must not contain malicious or knowingly or recklessly false statements about the products or services of INTEGRIS Health.
6. A User should not allow any other individual or entity to use his/her identification to post or view comments, nor should a User post under another person's name.
7. A User must not claim, imply, or create any social media site, blog, network, forum or group creating the appearance that he/she is speaking on behalf of INTEGRIS Health or any INTEGRIS Health entity, department, or affiliate unless the User has been authorized in writing by the senior leader of INTEGRIS Health Marketing and Communications or his/her designee, to do so.User must always avoid making any statements that could be viewed as an official communication of INTEGRIS Health.
8. Use of a social media site must not interfere with work commitments of User as determined by the User's manager.
9. INTEGRIS Health reserves the right to restrict and monitor caregivers' use of social

COPY

media while on company devices or on company time. Use of social media sites during work hours is strictly limited to business-related purposes.

B. **Participation on Non-INTEGRIS Health Hosted Social Media Sites**:

1. In all posts or comments where a User is commenting on INTEGRIS Health products and services:
    a. User should clearly identify User's relationship to INTEGRIS Health, such as caregiver, trainee, volunteer, or independent contractor; and
    b. The User should include a disclaimer that the views are User's own views and not those of INTEGRIS Health, such as: "*The views expressed on this post are mine and do not necessarily reflect the views of INTEGRIS Health*."
2. User should also refrain from using INTEGRIS Health names, logos or trademarks to indicate that communication is an official communication of INTEGRIS Health or to promote products or services, unless such use has been approved by ELT or its designee.
3. INTEGRIS Health has the right to: (i) require that a User discontinue the use of a social media site during working hours; or (ii) require that a User immediately stop acting or stop purporting to act on behalf of INTEGRIS Health, if INTEGRIS Health believes the User's communications are in violation of INTEGRIS Health policies, values or local, state or federal laws, including state and federal patient privacy laws.
4. When using personal social media accounts **outside of work**, caregivers must avoid content that undermines the trust, safety or professionalism expected of a health care professional, including but not limited to content that:
    a. Contains language that is obscene, defamatory, profane, libelous, threatening, harassing, or abusive to another person or entity.
    b. Promotes or celebrates violence, death or harm toward any individual or group.
    c. Expresses hate speech, threats or harassment based on protected characteristics (race, religion, national origin, gender, sexual orientation, age, disability, etc.).
    d. Advocates for or praises illegal activity.

C. **Participation on INTEGRIS Health Hosted Social Media Sites**:

1. Users must be 18 years of age to post on an INTEGRIS Health hosted social media site.
2. Communications must be limited to business purposes.
3. Subject to applicable laws, INTEGRIS Health can mandate that certain topics are not discussed and may restrict or remove any content that, in its sole discretion, it deems disruptive, illegal or in violation of any INTEGRIS Health policy or applicable laws.
4. Users must not use social media in a manner that subjects INTEGRIS Health to threats from computer viruses, privacy breaches, and/or any malicious activity as outlined in the Information Security Policy (SYS-IM-100). INTEGRIS Health may block social media sites in the event they are determined to be a security threat.

COPY

5. By posting any content, User grants to INTEGRIS Health the irrevocable right to reproduce, distribute, publish, and display such content and the right to create derivative works from User's content, edit or modify such content and use such content for any INTEGRIS Health purpose.
6. Subject to applicable laws, INTEGRIS Health has the right, at any time, for any reason and without notice, to (i) edit or delete any communications posted; (ii) block or terminate a User's access to the social networking site; (iii) require that a User temporarily discontinue the use of the INTEGRIS Health online community; or (iv) require that a User immediately stop acting or stop purporting to act on behalf of INTEGRIS Health, if INTEGRIS Health believes the User's communications are in violation of INTEGRIS Health policies, values or local, state or federal laws, including state and federal patient privacy laws.
7. Communications must not include any solicitation that is not compliant with the Solicitation and Distribution Policy (SYS-HR-606).
8. Communication must not support or oppose political campaigns or ballot measures.
9. All postings on INTEGRIS Health hosted social media are company records. INTEGRIS Health reserves the right to access, audit and disclose all active and/or archived or deleted postings.
10. INTEGRIS Health reserves the right to change the terms under which these services are offered.

COPY

5. CONSEQUENCES

A. User understands that any social media postings are subject to discovery in lawsuits, administrative, and regulatory proceedings, and internal investigations or audits conducted by INTEGRIS Health, and if INTEGRIS Health suffers any costs, expenses, loss or damages (including reasonable attorneys' fees and costs) as a result of User's postings on any social media site, User understands that he or she will be subject to corrective action, up to and including termination of employment.

B. Should a manager determine that a User's social media activity, including any access to social media sites on a mobile device, interferes with the User's work commitments, the manager has the discretion to direct the User to discontinue social media activities during working hours.

C. Violations of this policy may result in legal action for violations of applicable regulations and standards including, but not limited to the Health Information Portability and Accountability Act ("HIPAA"), Health Information Technology for Economic and Clinical Health Act ("HITECH') and Payment Card Industry ("PCI").

6. REFERENCES

A. Corrective Action Process Policy (SYS-HR-122)

B. Portable Devices Policy (SYS-IM-105)

C. Cellular Phone Usage (SYS-ADM-109)

D. Solicitation and Distribution Policy (SYS-HR-606)

E. Information Security Policy (SYS-IM-100)

F. Information Security Sanction Policy (SYS-IM-120)

G. Record Retention and Destruction Policy (SYS-LGL-109)

H. Privacy of Health Information Policy (SYS-CMP-116)

I. Code of Conduct (http://www.integrisok.com/codeofconduct)

J. HIPAA Final Security Rule, 45 CFR Parts 160, 162, and 164, Department of Health and Human Services, http://www.cms.hhs.gov/hipaa/hipaa2/regulations/security/default.asp, February 20, 2003

K. American Reinvestment and Recovery Act of 2009 (ARRA)/ (HITECH) http://frwebgate.access.gpo.gov/cgi-bin/getdoc.cgi?dbname=111_cong_bills&docid=f:h1enr.pdf [The HITECH Act begins at H.R. 1-112 through 1-165 (pp. 112 through 165 in the document). The security and privacy provisions are found at Subtitle D ¬ Privacy, beginning H.R. 1-144 (p. 144)]

Approval Signatures

Step Description	Approver	Date
Executive Leadership Team Approver	Maggie Wolff: SVP Chief of Staff	10/2025
Policy Governance Committee	Jennifer Rountree: Director Compliance	10/2025
	Maggie Wolff: SVP Chief of Staff	10/2025

Applicability

AllSet Urgent Care Clinics, INTEGRIS Baptist Medical Center (IBMC), INTEGRIS Canadian Valley Hospital (ICVH), INTEGRIS Grove Hospital (IGH), INTEGRIS Health - Corp., INTEGRIS Health Edmond Hospital (IHE), INTEGRIS Health Endoscopy Centers, INTEGRIS Health Enid Hospital (IHENID), INTEGRIS Health Medical Group (IHMG), INTEGRIS Health Ponca City Hospital, INTEGRIS Health Woodward Hospital, INTEGRIS Hospice, INTEGRIS Jim Thorpe Rehabilitation, INTEGRIS Lakeside Women's Hospital (LWH), INTEGRIS Miami Hospital (IMH), INTEGRIS Southwest Medical Center

Standards

No standards are associated with this document