

**ST. CLAIR COUNTY COMMUNITY MENTAL HEALTH AUTHORITY**

**ADMINISTRATIVE PROCEDURE**

Date Issued 3/21

Page 1

<b>CHAPTER</b> Administrative	<b>CHAPTER</b> 01	<b>SECTION</b> 002	<b>SUBJECT</b> 0075
<b>SECTION</b> Operations	<b>SUBJECT</b> Use of Social Media, Texting, and Email		
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I. APPLICATION:

- SCCCMHA Board
- SCCCMHA Providers & Subcontractors
- Direct Operated Programs
- Community Agency Contractors
- Residential Programs
- Specialized Foster Care

II. PURPOSE STATEMENT:

St. Clair County Community Mental Health Authority (SCCCMHA) shall provide guidelines to ensure acceptable usage for e-mail, text messaging, and social media.

III. DEFINITION:

A. Social Media: Forms of electronic communication (such as websites for social networking and microblogging) through which users create online communities to share information, ideas, personal messages, other content (such as videos), or to develop social and professional contacts. Some examples include Facebook, Instagram, Twitter, LinkedIn, blogs, YouTube, etc.

IV. STANDARDS:

A. As a general rule, the following principles should be used:

1. Discussing confidential agency business on social media is strictly prohibited. This includes information about business practices, individuals receiving services, and conversations related to services.
2. Employees (regardless of whether their social media identifies them as an employee of SCCCMHA) may post personal statements on matters of public concern on social media sites to the degree that their speech does not meaningfully interfere with the performance of the employee's duties or operations of SCCCMHA, undermine the mission of SCCCMHA, create disharmony among co-workers, or impair discipline by superiors.
3. Employees shall use discretion and common sense when employing social media for professional and personal use and ensure that they are not inadvertently compromising our

<b>CHAPTER</b> Administrative	<b>CHAPTER</b> 01	<b>SECTION</b> 002	<b>SUBJECT</b> 0075
<b>SECTION</b> Operations	<b>SUBJECT</b> Use of Social Media, Texting and Email		

professional, legal, or ethical standards. Employees (regardless of whether their social media identifies them as an employee of SCCCMHA) should assume that their speech and related activity on social media sites will reflect upon their position and the agency.

4. As a public entity, employees are cautioned that speech (on or off-duty), made pursuant to their official duties is not protected speech under the First Amendment of the U.S. Constitution and may form the basis for discipline if deemed detrimental to SCCCMHA.
5. Statements representing SCCCMHA are prohibited unless authorized individuals post the information on an official agency site. Do not use vulgar/offensive language, endorse products/services, or political parties/candidates on agency sponsored postings.
6. Consent forms shall be used for individuals requesting contact with social media. This form must be signed by the individual, primary case holder and parent/guardian as appropriate. The consent for Mental Health Services can be found in OASIS.
7. Social media should not be automatically offered as an option, this should be a request from the individual receiving service.
8. Any employee who violates this policy is subject to discipline that could result suspension or termination from employment.

B. Email:

This method of communication is sometimes requested as the preferred method of contact by people we serve. It provides an alternative to voice mail, “phone tag”, etc. Email should be used for situations such as appointment reminders/confirmation and things to bring to appointments, and no clinical therapy or exchanges of personal information. As there is no guarantee that the information sent to an individual intended to receive an email will not be seen by other individuals, precautions need to be taken to ensure that every effort is made to eliminate confidential information from this method. A return receipt will be placed on all emails sent to individuals receiving services. For individuals that prefer this method of communication, a Consent for Mental Health Services shall be completed including the appropriate email address for this information to be sent. Prior to any exchange of information, a test email will be sent to individuals. Emails are sent from a SCCCMHA email and shall not be sent from a personal email account. All emails containing confidential and/or protected health information that are sent to an external email address must be encrypted.

C. Text Messaging:

This method of communication provides a more readily available conversation and increases the uninterrupted access to communication for many due to its portability. Text messages may be used for reminder appointments, scheduling and reminder of items to bring to appointments, and no clinical therapy or exchanges of personal information. As there is no guarantee that the information sent to an individual intended to receive a text message will not be seen by other individuals,

CHAPTER	CHAPTER	SECTION	SUBJECT
Administrative	01	002	0075
SECTION	SUBJECT		
Operations	Use of Social Media, Texting and Email		

precautions need to be taken to ensure that every effort is made to eliminate confidential information from this method. For individuals that prefer this method of communication, a Consent for Mental Health Services shall be completed including the appropriate phone number for this information to be sent. Prior to any exchange of information, a phone call will be placed to the individual receiving services at the text number prior to sending any information to verify the number is correct. Text messages shall not be sent from a personal phone number. Phones used for text messaging will be limited within the agency to ensure that they are monitored during working hours. All agency phones will be password protected. Program designees will hold cell phones used for texting. This method is only permitted if the agency provides a telephone/other electronic devices that has texting capabilities. Text messaging is allowed under special circumstances with Supervisor/ Management Team approval. Example: COVID Support Line texting.

D. Social Media Services:

This type of electronic communication is appropriate for broad agency high-level interaction. Social media that represents SCCCMHA shall be handled by a SCCCMHA employee designated to perform that function. As a general rule, anyone that provides a direct service to an individual shall not engage in conversation or become “friends” via social media.

V. PROCEDURES:

None.

VI. REFERENCES:

A. CARF Risk Management Section 1.G.3

VII. EXHIBITS:

None Available

VIII. REVISION HISTORY:

Dates issued 11/12, 01/14, 11/14, 11/15, 11/16, 11/17, 11/18, 03/20, 07/20.