

(This copy is abridged only to remove references to internal policies and documents that are proprietary)

Kaiser Permanente Social Media Policy

April 30, 2009

1.0 Policy Statement

Social media may be used by Kaiser Permanente employees for business-related purposes subject to the restrictions set forth in this policy. These restrictions are intended to ensure compliance with legal and regulatory restrictions and privacy and confidentiality agreements. Social media includes items such as blogs, podcasts, discussion forums, and social networks.

2.0 Purpose

The purpose of this policy is to provide Kaiser Permanente employees with requirements for participation in social media, including Kaiser Permanente-hosted social media, and in non-Kaiser Permanente social media in which the employee's Kaiser Permanente affiliation is known, identified, or presumed.

3.0 Scope/Coverage

This policy applies to Kaiser Foundation Health Plan, Inc. and Kaiser Foundation Hospitals and their subsidiaries (KFHP/H) and the non-physician employees of the Permanente Medical Groups.

4.0 Definitions

4.1 Blog – Short for “Web log,” a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.

4.2 Electronic Media - Non-computing devices, e.g., floppy diskettes, flash memory drives, CDs DVDs, tapes, hard disks, internal memory, and any other interchangeable, reusable, and/or portable electronic storage media (1) on which electronic information is stored, or (2) which are used to move data among computing systems/devices.

4.3 Kaiser Permanente Information - Information in any form or media that is created by or on behalf of Kaiser Permanente in the course and scope of its business, regardless of whether that information is maintained or stored by Kaiser Permanente and others on Kaiser Permanente's behalf. Examples of Kaiser Permanente information include, but are not limited to, patient and member records, personnel records, financial information, company competitive information, Kaiser Permanente-developed intellectual property, and business e-mail messages.

4.4 Member/Patient Identifiable Information (MPII) – Any individually identifiable information regarding a member/patient of Kaiser Permanente collected, received, created, transmitted, or maintained in connection with his/her status as a member or patient, such as PHI and CHD. MPII includes, but is not limited to, information about a member/patient's physical or mental health, the receipt of health care, or payment for that care; member/patient premium records, enrollment and disenrollment information; name, address, Social

Security Number, account number, security code, information from or about transactions, driver's license number, financial or credit account numbers, phone numbers, ISP and Internet domain addresses, and other personal identifiers. MPII does not include individually identifiable information in Kaiser Permanente employment records; however, it may be subject to other state and federal privacy protections. MPII does not include individually identifiable information (such as a cell, home or business phone number) that a workforce member obtains, transmits, or maintains about another workforce member in connection with a personal or employment-related relationship with that person.

- 4.5 Podcast** – A collection of digital media files distributed over the Internet, often using syndication feeds, for playback on portable media players and personal computers.
- 4.6 Protected Health Information (PHI)** - Individually identifiable information (oral, written or electronic) about a member/patient's physical or mental health, the receipt of health care, or payment for that care. PHI includes individually identifiable member/patient payment, dues, enrollment and disenrollment information. Individually identifiable health information in Kaiser Permanente employment records is not PHI; however, it may be subject to other state and federal privacy protections.
- 4.7 RSS feeds or Syndication feeds** - A family of different formats used to publish updated content such as blog entries, news headlines or podcasts and "feed" this information to subscribers via e-mail or by an RSS reader. This enables users to keep up with their favorite Web sites in an automated manner that's easier than checking them manually (known colloquially as "really simple syndication").
- 4.8 Social media** - Includes but are not limited to blogs, podcasts, discussion forums, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e., Wikis), RSS feeds, video sharing, and social networks like MySpace and Facebook.
- 4.9 Wiki** - allows users to create, edit, and link Web pages easily; often used to create collaborative Web sites (called "Wikis") and to power community Web sites.

5.0 Provisions

Kaiser Permanente-Hosted Sites

- 5.1 Using Social Media.** Employees are expected to adhere to Kaiser Permanente compliance requirements and the Kaiser Permanente Principles of Responsibility when using or participating in social media. All the rules that apply to other Kaiser Permanente communications apply here, specifically: respecting members, patients, customers and one another; protecting confidentiality, privacy and security; and safeguarding and proper use of Kaiser Permanente assets.
- 5.2 Be Respectful.** Employees may not post any material that is obscene, defamatory, profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting to Kaiser Permanente-hosted sites.
- 5.3 Kaiser Permanente-Hosted Blogs.** Kaiser Permanente-hosted blogs must focus on subjects related to the organization.

- 5.4 **Abide by the law and respect copyright laws.** Employees may not post content or conduct any activity that fails to conform to any and all applicable state and federal laws. For Kaiser Permanente's and our employees' protection, it is critical that everyone abide by the copyright laws by ensuring that they have permission to use or reproduce any copyrighted text, photos, graphics, video or other material owned by others.
- 5.5 **Obtain pre-approval before setting up Kaiser Permanente-hosted sites.** Employees must seek approval from their supervisor before setting up a Kaiser Permanente-hosted blog or other social media site.

Non-Kaiser Permanente Hosted Sites

- 5.6 **Proprietary Information.** Employees may not disclose any confidential or proprietary information of or about Kaiser Permanente, its affiliates, vendors, or suppliers, including but not limited to business and financial information, represent that they are communicating the views of Kaiser Permanente, or do anything that might reasonably create the impression that they are communicating on behalf of or as a representative of Kaiser Permanente.
- 5.7 **Member/Patient Confidentiality.** Employees may not use or disclose any member/patient identifiable information of any kind on any social media without the express written permission of the member/patient. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of the Health Insurance Portability and Accountability Act (HIPAA) and Kaiser Permanente policy.
- 5.8 **Self-Hosted Sites.** Employees must not say or suggest that the views and opinions they express related to Kaiser Permanente and health care topics represent the official views of Kaiser Permanente.

Requirements Applicable to Both Kaiser Permanente and Non-Kaiser Permanente Hosted Sites

- 5.9 **Policy application.** This policy applies to employees using social media while at work. It also applies to the use of social media when away from work, when the employee's Kaiser Permanente affiliation is identified, known, or presumed. It does not apply to content that is non-health care related or is otherwise unrelated to Kaiser Permanente.

6.0 Appendices

- 6.1 Blogging Best Practices (follows next page)

Kaiser Permanente Blogging Best Practices

Blogging is becoming a more common way to communicate and tool for self expression. These best practices will help you when participating in social media – in particular – blogs and blogging.

Use a disclaimer: If you publish a blog, post a comment, or share an image and it has something to do with the work you do at Kaiser Permanente.

Whether you publish a blog or participate in someone else's, make it clear that what you say is representative of your views and opinions and not necessarily the views and opinions of Kaiser Permanente. At a minimum in your own blog, you should include the following standard legal disclaimer language:

The postings on this site are my own and don't represent Kaiser Permanente's positions, strategies or opinions.

OR

DISCLAIMER: This is a personal Web site, produced in my own time and solely reflecting my personal opinions. Statements on this site do not represent the views or policies of my employer, past or present, or any other organization with which I may be affiliated. All content is copyrighted.

Note to managers and executives – This standard disclaimer does not by itself exempt Kaiser Permanente managers and executives from a special responsibility when blogging. By virtue of their position, managers and executives must consider whether personal thoughts they publish may be misunderstood as expressing Kaiser Permanente positions. A manager should assume that his or her team will read what is written. A blog is not the place to communicate Kaiser Permanente policies to employees.

Starting Your Internal Blog: Before starting your own internal Kaiser Permanente blog, first get your manager's approval to do so. Follow the proper local procedures to actually set up your blog.

Get Approval: Do not announce company news on your blog. Do not cite or reference clients, partners or suppliers without their approval.

When the company wishes to communicate publicly – whether to the marketplace or to the general public – it has well-established processes to do so. Only those officially designated by Kaiser Permanente have the authorization to speak on behalf of the company.

You must make sure you do not disclose or use Kaiser Permanente confidential or proprietary information or that of any other person or company on any blog. For example, ask permission to publish someone's picture or a conversation that was meant to be private.

Clients, partners or suppliers should not be cited or obviously referenced without their approval. On your blog or any comment you may post to another blog or message board, never identify a client, partner or supplier by name without permission and never discuss confidential details of any of the above. It is acceptable to discuss general details about the kinds of projects and to use non-identifying pseudonyms for a client (e.g., Client 123) so long as the information provided does not violate any non-disclosure agreements that may be in place with the client or



make it easy for someone to identify the client. Furthermore, your blog is not the place to conduct business with a client.

Identify yourself: Name and, when relevant, your position with Kaiser Permanente

Identify yourself – name and, when relevant, your role at Kaiser Permanente - when you blog about Kaiser Permanente or Kaiser Permanente-related matters. Write in the first person. You must make it clear that you are speaking for yourself and not on behalf of Kaiser Permanente.

When posting comments on internal Kaiser Permanente blogs use your company e-mail and do not use pseudonyms or post anonymously.

Take responsibility: You are personally responsible for your post.

Blogs, wikis and other forms of online discourse are individual interactions, not corporate communications. Kaiser Permanente staff and physicians are personally responsible for their posts. Be mindful that what you write will be public for a long time.

One of Kaiser Permanente's core values is "trust and personal responsibility in all relationships." As a company, Kaiser Permanente trusts – and expects – its workforce to exercise personal responsibility whenever they blog or participate in any social media medium. This includes not violating the trust of those with whom they are engaging. Kaiser Permanente staff members should not use this medium for covert marketing or public relations purposes. If and when members of Kaiser Permanente's Communications, Marketing, Sales or other functions engaged in advocacy for the company have the authorization to participate in blogs, they must identify themselves as such.

Respect Copyright laws: When writing, you should never quote more than a few sentences; linking to another's work is the best blogging policy. Do not post or conduct any activity that fails to conform to any and all applicable laws. For Kaiser Permanente's protection as well as your own, it is critical that you show proper respect for copyrighted material owned by others this includes copyright laws for text as well as images.

Be yourself – Some bloggers work anonymously, using pseudonyms or false screen names. Kaiser Permanente discourages that in blogs, wikis or other forms of online participation that relate to Kaiser Permanente, our business or issues with which the company is engaged. We believe in transparency and honesty. If you are blogging about your work for Kaiser Permanente, we encourage you to use your real name, be clear who you are, and identify that you work for Kaiser Permanente. Nothing gains you notice in the "blogosphere" more than honesty -- or dishonesty. If you have a vested interest in something you are discussing be the first to point it out. But also be smart about protecting yourself and your privacy. What you publish will be around for a long time, so consider the content carefully and also be judicious in disclosing personal details.

Speak in the first person – Use your own voice; bring your own personality to the forefront; say what is on your mind.

Add value – Don't just funnel raw information to a community, add value. That could mean anything as vast as putting context around news, sharing your own opinions or different opinions. Background information you choose to share about yourself, such as information about your family or personal interests, may be useful in helping establish a relationship between you and your readers, but it is entirely your choice whether to share this information.



Blogs hosted on Kaiser Permanente-owned domains should be used in a way that adds value to Kaiser Permanente's business. This includes: if it helps you, your coworkers, our clients, or our partners to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of Kaiser Permanente's products, processes and policies; or if it helps to promote Kaiser Permanente's values.

Be accurate – Respect the facts and link to the trusted sources that validate your opinions.

Know your fellow bloggers – The most successful bloggers are those who pay attention to what others are saying about the topic they want to write about and generously reference and link to them. Who's blogging on the topics that most interest you? On the Internet, a quick way to find out who's saying what is to use the search tools on Technorati, Google Blogs or Blogdigger. Drop your fellow bloggers a note to introduce yourself and your blog. There is also an informal community of Kaiser Permanente bloggers, so you can quickly find out which of your peers are part of the conversation.

Don't pick fights – When you see misrepresentations made about Kaiser Permanente in the media, by analysts or by other bloggers, alert Kaiser Permanente's corporate communications, public relations and media relations representatives.

Be the first to respond to your own mistakes – If you make an error, be up front about your mistake and correct it quickly. If you choose to modify an earlier post, make it clear that you have done so. Do not delete posts.

Use your best judgment – Remember that there are always consequences to what you write. If you're about to post something that makes you uncomfortable, review the suggestions above and think about why that is. If you're still unsure, and the post is about Kaiser Permanente business, feel free to discuss your proposed post with your manager. Ultimately, however, you have sole responsibility for what you choose to post to your blog or express online. You should make sure that blogging does not interfere with your job or commitments to customers.

Be professional – Kaiser Permanente workforce members are directed that, as with all communications, statements made in the confines of private blogs or chat rooms must treat the company and its employees, customers and competitors with respect.

Be mindful of the world's longer memory – Everything you say is likely to be indexed and stored forever, either via search engines or through bloggers that reference your posts.