

Wood County Board of Developmental Disabilities  
PROCEDURE

Procedure #: 02-ALL-ALL-0871 (CP) Subject: Social Media  
Effective Date: 09-07-16 Last Revision: 06-13-2024  
Person Responsible: Communications & Community Engagement Manager

Approvals/Date: Brent Coban 6-13-24 A. B. B. B. B. 6-13-24  
Superintendent, WCBDD Date Department Director/Coordinator Date

The following definitions apply:

**Portable Device** – A small type of a computing device, including but not limited to, laptops, netbooks, tablets, phones, USB drives, external hard drives, and like devices.

**Security or Security Measures** – Encompass all of the administrative, physical, and technical safeguards in an information system.

**Workstation** – An electronic computing device, for example, a laptop or desktop computer, or any other device that performs similar functions and electronic media stored in its immediate environment.

**SOCIAL MEDIA USE VIA ANY PORTABLE DEVICES/WORKSTATIONS**

Social networking sites, notably Facebook but including many others, have become a significant communication medium in our world. The board mandates specific guidelines for the use of these sites both limiting certain activities to ensure confidentiality and privacy of individuals being served while permitting other uses that advance the mission of the board. **Board Sponsored Use.** The HIPAA Privacy Officer or Superintendent will approve the establishment and provide guidelines for use of a board sponsored Facebook Page/Group or similar social network.

**1. Personal Use of Facebook and Other Social Network Sites by Employees.**

**A. Employee Personal use of Facebook.**

- 1. Employee Use During Work Hours.** During work hours, employees are expected to focus on work-related activities. Consequently, in general, they are expected to not keep Facebook and other social media channels open as management believes that this communication medium has the potential to be distracting and has the potential to reduce the employee's productivity. Certain positions whose daily work assignment includes social media use and interaction may be permitted to utilize social media during work hours. These positions include Communications and Community Engagement Manager, Community Engagement Specialist, Recreation/Wellness Manager, Recreation Specialists, and those given administrative permissions to the page(s) and Social Media accounts.
- 2. Employee Use at Any Time.** Social Media Personal conduct also includes employees' use of social media both while on-duty and off-duty. Free speech is not protected unless the speech is a matter of public concern. Employees may be disciplined for speech that negatively affects the workplace or reflects poorly on the County. Facebook and all other social media are semi-public communication mediums; while each include many options for specifying levels of privacy, Social Media users often share private information in unintended ways. Further, Social Media sites have a history of malfunctions and security breaches. Consequently, any use of Social Media has the potential to become a public communication, so, employees of the board must follow the following guidelines:
  - a. Sharing of Work-Related Activities.** Employees should limit the sharing of any Board related information to information that would be acceptable to be made public, for example, on the front page of a major newspaper.
    - i.** Examples of information that they would be appropriate to share on one's wall include:
      - The employee's excitement and satisfaction with the work and mission of the board,
      - Details of an upcoming public event sponsored by the board, such as a local "Special Olympics" day,
      - The name of a friend who is a co-worker at the board.
    - ii.** Examples of information that would be inappropriate to share on one's wall include:
      - The name of an individual receiving services from the board,
      - A complaint about the board such as displeasure with a supervisor or co-worker,
      - Any Protected Health Information, PHI, (which includes facial images of individuals being served).Employees are further encouraged but not required to limit communications on Social Media to those that would portray them in a professional manner.
  - b. Messaging.** Employees should not use Social Media messaging resources for board communications, especially if they involve PHI. Employees are reminded that all board communications are subject to public records disclosure and our email system is used for our official record. Further, Social Media does not utilize encryption which is required by HIPAA for transmission of PHI over an open communications network.

References: 45 CFR Part 164

Procedures: 02-ALL-ALL-0686 (AD)  
02-ALL-ALL-0845 (CP)

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