



Policy Title:	Use of Social Media
Policy #:	01-002-0075
Effective Date:	02/25/2025
Approved by:	Telly Delor, Chief Operating Officer
Functional Area:	Administrative
Responsible Leader:	Stephanie Shank, Director of Human Resources
Policy Owner:	Jody Kruskie, Labor/Employee Relations Manager
Applies to:	SCCCMH Staff, SCCCMH Board, Direct Operated Programs

Purpose: To provide guidance regarding the acceptable use of social media.

I. Policy Statement

It is the policy of St. Clair County Community Mental Health (SCCCMH) to limit the use of *social media* when necessary to fulfill our duty to protect the confidentiality of individuals served, to ensure compliance with federal and state law, including the HIPAA Privacy Rule and the Michigan Mental Health Code's confidentiality requirements, and to align with professional ethics and accreditation requirements.

II. Standards

- A.** Social media is appropriate for broad agency high-level interaction. Social media that represents SCCCMH shall be handled by a SCCCMH employee designated to perform that function, in accordance with [Board Policy #01-002-0035 Public Communications and Marketing](#). Unauthorized statements that imply representation of SCCCMH, whether or not on an official SCCCMH site, are prohibited.
- B.** Unacceptable agency-sponsored postings include endorsing products or services, using vulgar or offensive language, or engaging in speech supporting or opposing political parties or candidates.
- C.** As a general rule for all social media interaction, 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 SCCCMH) may post personal statements on matters of public concern on social media sites only if their speech does not:
 - meaningfully interfere with the performance of the employee's duties or operations of SCCCMH
 - undermine the mission of SCCCMH
 - create disharmony among coworkers
 - or impair discipline by superiors.
3. As employees of 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 SCCCMH.
4. 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 professional, legal, or ethical standards. Employees (regardless of whether their social media identifies them as an employee of SCCCMH) should assume that their speech and related activity on social media sites will reflect upon their position and the agency.
5. As a general rule, anyone that provides a direct service to an individual shall not engage in conversation or become "friends" with the individual via social media. See SCCCMH [Administrative Policy #06-001-0005, Personal Involvement with Recipients of Services](#).
6. Any employee who violates this policy is subject to discipline that could result in suspension or termination from employment.

III. Procedures, Definitions, and Other Resources

A. Related Policies

[Board Policy #01-002-0035 Public Communications and Marketing](#)

[Administrative Policy #06-001-0005, Personal Involvement with Recipients of Services](#)

B. Definitions

1. *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, X (formerly known as Twitter), Snapchat, LinkedIn, blogs, YouTube, etc.

C. Forms

N/A

D. Other Resources (i.e., training, secondary contact information, exhibits, etc.)

N/A

E. References

1. CARF Risk Management Section 1.G.3

IV. History

- Initial Approval Date: 11/2012
- Last Revision Date: 02/2025 BY: Jody Kruskie and Joy Vittone
- Last Reviewed Date: 09/2023
- Non-Substantive Revisions: N/A
- Key Words: social media, confidentiality, privacy, Facebook, Snapchat, YouTube, Instagram