



## ESSENT HEALTHCARE, INC.

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<b>Section:</b>	<b>HIPAA Privacy</b>	<b>Effective Date:</b>	<b>11/30/09</b>
<b>Subject:</b>	<b>Internet Use/Social Networks</b>	<b>Revision Date:</b>	<b>11/30/09</b>
<b>Policy #:</b>	<b>HIPAA-018</b>	<b>Review Date:</b>	<b>11/30/09</b>
<b>Responsible Party:</b>	<b>Corporate Compliance Officer</b>	<b>Revision #:</b>	<b>1</b>

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**Scope:**

This policy applies to all workforce members of Essent Healthcare, Inc., (“Essent”).

**Purpose:**

The purpose of this policy is to set forth guidelines that all Essent Facilities and all Essent Workforce Members must follow when using social network sites or other types of computer-based and/or internet-based social networks.

**Policy:**

As outlined in the Electronic Communications Policy (Policy#: ISP-011), it is the policy of Essent that, in order to remain competitive, better serve our customers, and give our talented workforce the best tools to do their jobs, Essent continues to adopt and make use of new communication technologies. This means that both our facilities and our workforce members have access to one or more forms of Essent Electronic Communication Systems, including computer networks, the internet, and/or social networking sites.

Essent encourages the use of these media and associated services to the extent that they are useful and assist the employee in performing their job or promote an Essent facility. This procedures listed below cannot address every possible situation but will clearly express Essent’s philosophy and the general principles that workforce members should apply while visiting social networking sites. The procedures listed below will also govern the use of social networking media by Essent facilities.

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**Definitions:**

A “*blog*” (short for “web log”) is a website maintained by an individual or organization with regular entries of commentary, descriptions of events, or other materials such as graphics or video. Blogs may provide commentary or news on a particular subject; others function as more personal on-line diaries.

***Social Networking Sites:*** For the purposes of this policy social networking sites are on-line social structure made up of individuals or organizations that are tied by one or more specific types of



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interdependency, such as values, visions, ideas, financial exchange, friendship, business operations, professional exchange, etc. Some of the more widely-known examples of social network sites include Facebook, Twitter, and My Space.

**“Confidential Company Information”** is information in any form or media that is created by or on behalf of any Essent facility in the course and scope of its business. Examples of confidential Company information include, but are not limited to, patient records, personnel records, financial information, Company competitive information, Essent intellectual property, and business email messages.

### **Procedures for Workforce Members:**

1. Internet access is a privilege and must be carried out in a manner that is consistent with job responsibilities and Company policies addressing appropriate use of Information Technology resources. Workforce members using the internet, internet blogs, emails, or any social network sites during work hours must never let such use interfere with their work-related duties.
2. Workforce members using the internet, internet blogs, emails, or any social network sites must never “post” confidential Company information to such sites. **Revealing confidential Company information, whether using Company resources or using ones own private resources, violates your confidentiality agreement with the Company and may result in termination of employment.** In some cases, such as for certain HIPAA violations, criminal penalties may even be applied.
3. Workforce members using Company resources to access the internet or any other social networking media should have no expectation of privacy. Essent monitors resource usage and no system user should expect privacy with regards to Essent systems and/or resources.
4. The Company may provide access to the Internet to accomplish the business objectives of the Company. Workforce members are not allowed to use Company resources to access the Internet or social networking sites to view, download, copy, or process discriminatory, harassing, obscene, malicious, defamatory or pornographic material.
5. Be respectful! Workforce members must not post any material that is obscene, defamatory,



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profane, libelous, threatening, harassing, abusive, hateful, or embarrassing to another person or entity when posting to Essent-hosted sites.

6. Workforce members must not give medical advice or attempt to diagnose any medical condition via the internet, internet blogs, emails, or any social network sites.

### **Procedures for Essent Facilities:**

1. Essent Facilities shall establish and maintain an organizational presence on popular Social Media sites and through Blogs. This presence will facilitate expanding communication opportunities for patients, employees, and other stakeholders in the communities served the Company. Essent-hosted blogs, web pages, and/or social media must focus on subjects related to the Company.
2. Facilities (or departments thereof) using blogs, social networking sites and/or web sites shall do so under the guidance of the facility CEO (or his/her designee) who shall work with the Corporate Compliance Officer to ensure compliance with this policy.
3. The Company supports its workforce members' use of the internet, social media and blogs, recognizing that Workforce members have a strong voice in representing the organization. Workforce members engaged in personal or professional social media and blog communications that reference Company-related content shall do so in a manner consistent with the organization's mission, values, and administrative policies and procedures. All workforce members must safeguard and ensure the privacy and security of patient health information, as well as other Confidential Company Information at all times.
4. Workforce members must not give medical advice or attempt to diagnose any medical condition via the internet, internet blogs, emails, or any social network sites.
5. All users must register (or become a "friend" in Facebook) before being allowed to post comments to the social networking site.
6. Any social networking site hosted by any Essent Facility that allows for the posting of content



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by users shall include the following disclaimer: *By posting content to this social networking site, you agree to the following terms and conditions:*

- a. *As a guest posting content to this social media site, you agree that you will not violate any laws or regulations; or transmit any material that is unlawful, disruptive, threatening, profane, abusive, harassing, embarrassing, defamatory, obscene, libelous, hateful, or racially, ethnically or otherwise objectionable.*
- b. *[enter facility name] reserves the right to monitor, restrict, block, suspend, terminate, delete or discontinue your access at any time, without notice and for any reason at its sole discretion.*
- c. *By posting any content to this social networking site, you grant [enter facility name] the irrevocable right to reproduce, distribute, publish, and/or display such content.*
- d. *You shall defend, indemnify, and hold harmless [enter facility name] and its affiliates, officers and directors, from any and all liability or damages of any nature whatsoever that may arise or result from your posting to this social networking site.*
- e. *This policy may be updated at any time without notice.*

7. Each Essent Facility that hosts social media sites shall designate an individual to monitor each site in order to ensure that no offensive, harassing, defamatory, or confidential information is posted to the site. When encountered, such information shall be deleted by the moderator immediately.

### **References:**

Health Insurance Portability and Accountability Act

### **Also See:**

Policy ISP-011; Electronic Communications Policy