

EVERYBODY'S

TALKING

ABOUT

IT



SOCIAL MEDIA IS GIVING PROVIDERS NEW WAYS TO COMMUNICATE WITH FAMILIES, PROSPECTS, AND OTHER KEY PLAYERS.

Joni Morrissey, the granddaughter of a resident at The Worthington, likes to look in on the Brick, N.J., assisted living facility's Facebook page to see what's happening at the facility and in the lives of her grandmother and her grandmother's friends and also to chat with and be supportive of the community of "friends" of the page.

"It's a great way to actually see on a regular basis what is going on," says Morrissey. "My relatives in Texas and Florida can see my grandmother 'in the flesh,' so to speak, and comment on goings on. We can pass condolences and well wishes to the families of other residents if there is a death or illness. We even joke around, too!"

Measures Protect Privacy

"Opening families up to this type of media gives true meaning to an open door policy," says Morrissey. "What's nice also is that Julia [the administrator] keeps tabs on who our members are so that our loved ones are not out there in cyberspace for all to see."

Julia Fraser, administrator of The Worthington, controls who's allowed to become a "friend" of the page—only residents, family members, and real-time friends—so residents' privacy isn't violated. She developed a permission slip for residents or their family members to sign before a photo of them is ever posted on the Facebook page. Fraser likes to post photos of residents involved in a craft or other activity and can post a caption under the photo using the resident's own words to send a message to family members—and other "friends"—electronically.

Fraser and her staff are "extremely diligent" about keeping families involved in life at the facility, and the Facebook page is an extension of that effort. "I send out a family letter every month, we call families all the time for good and bad things, e-mail, text, etc.," says Fraser. "After I myself joined Facebook and realized how easy it was to keep up with [my own] friends and family, it seemed like a perfect tool to add to The Worthington's efforts in open communication."

Fraser says the top three drivers of satisfaction are



communication, communication, and communication. “Any tool you can use to safely communicate with your families—use it. We scored huge in the [Summit, N.J.-based parent company Chelsea Senior Living’s] customer satisfaction survey because we communicate like mad.”

What Is Social Media?

Social media is a conversation, a give and take, as opposed to the monologues of television and the printed word. It is communication that informs, but then goes beyond that to spark a discussion. Personalities emerge from the profile, the status update, tweet, photo, blog, or video. Acquaintances become “friends,” friends become “family,” and family become more closely bound—all because of frequent communication that ranges from trivial to earth-shaking, just as life does.

Social media is a term that covers an array of computer platforms, the most popular today being Facebook, YouTube, MySpace, Twitter, LinkedIn, and Flickr.

“Social media is the term for Web sites that publish user-generated content,” says John Cruickshank, an attorney with Alaniz & Schraeder, a labor relations legal firm based in Houston. “Most experts describe the rise of social media as Web 2.0, [a term that] was coined to identify the shift in the production of Web site content from large corporations to individuals.” Now, many of the large corporations have incorporated user-generated content to their Web sites, adding blogs, social networks, or discussion boards for feedback.

Most sites are growing at a tremendous pace, says Cruickshank.

Scott Testa, a professor of business at Cabrini College in Philadelphia, has conducted research into social media.

“The fastest growing [social media sites] at this point are Facebook and Twitter,” says Testa. “MySpace is starting to lose members or is stagnant. LinkedIn continues to grow, and there



‘IT’S NOT JUST A FAD, AND IT’S NOT JUST TEENAGERS. A FUNDAMENTAL SHIFT OF HOW WE COMMUNICATE HAS HAPPENED.’

are some other smaller niche sites that are gaining momentum.” Facebook alone has 350 million active users as of September 2009.

“It’s not just a fad, and it’s not just teenagers,” says Beverly Macy, chief executive officer (CEO) of Gravity Summit, a Beverly Hills, Calif.-based

organization that educates companies on how to use social media in their marketing efforts. “A fundamental shift of how we communicate has happened due to social media,” she says.

Social media offers up an array of possibilities to long term care providers, provided they go about the process of immersing themselves in it in the right way. And because front-line staff are likely already familiar with it, the usual barrier to incorporating new technology to the workplace—resistance due to unfamiliarity—isn’t there.

But Would Residents And Family Use It?

Interviews with numerous long term care providers revealed that many believe that not only would their residents never use social media, but that their baby boomer children, who often make the decision to place a resident in a par-


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SOCIAL MEDIA: TIPS AND TERMS

Before jumping into the world of social media, company leaders must first determine why they are doing it and what they want to accomplish with it. Mashable.com is a blog that focuses exclusively on social media news and resources and offers numerous “how to” guides for getting started.

■ *Identify a champion.* Some department or individual within the company needs to “own” social media. Lots of departments might be consulted when it comes to decision making, but ultimately someone has to be held accountable for the outcomes. For many smaller companies, this responsibility might fall to sales or marketing. Another option is using consultants for certain aspects of the strategy and internal resources for the rest.

■ *Consider the employees.* Companies need to assess their employees’ level of knowledge and interest and offer training where necessary. General Motors, for example, posted a 45-minute Social Media 101 interactive training course on its intranet that gave employees the basics on how, why, and where to engage in social media. Other companies have developed job aids, such as flow charts or decision trees, to help employees determine when and how to respond to blogs and inquiries.

■ *Listen first.* Don’t be afraid to ask questions on- and offline. It is important to remember that some ideas will not work, but there are lessons to be learned from such failures. Identify expert users to follow and recommend connections.

Some Popular Sites

The American Health Care Association recently began encouraging

its members to utilize social media to promote and publicize National Nursing Home Week activities. Following are some quick tips for getting started with three of the most popular sites:

Facebook. A social networking



Facebook alone has more than 10 million users aged 55 and older.

Web site where individuals can create a personal or facility profile, add “friends,” and send messages. Facebook includes a number of unique features and applications, allowing users to update personal or facility profiles as often as they like.

To get started, a user creates an account on www.facebook.com. To create a facility account, click on “Create a Page for a Celebrity, Band, or Business.” The account enables the user to add information to the profile, write thoughts on the Facebook “Wall,” and search for and add friends or fans. Users can also upload photos or videos, plan events, and send e-mail. Facebook users can join groups and become fans of other Facebook pages. Facebook is a free tool.

Twitter. Twitter is a service that al-

lows friends, colleagues, and businesses to stay connected through short messages sent via Twitter’s Web site. Messages may also be sent via text messaging or instant messaging. To create a personal or facility account, visit www.twitter.com and click on

“Sign Up Now.” After creating an account, the first “tweet” can be posted. In the box under “What’s happening?” write a message in 140 characters or less and click “Update.” In order to receive other tweets, follow others. Messages from these accounts will be posted on the home page. There is no charge for using Twitter. If using Twitter via a mobile phone, text charges may apply depending on the mobile phone plan. For more information, visit www.twitter.com and click on “Help” at the bottom of the page.

YouTube. YouTube is a Web site designed for users to watch, upload, and comment on videos.

Virtually anyone with an Internet connection and a webcam or compatible digital camera can upload videos to YouTube. To watch a video, visit www.youtube.com and search for it by entering key words in the search field. To upload a video or leave a comment, an account must be established. Go to the site and click on “Create Account.”

Uploading a video is done by clicking on the “Upload” button at the top of the page, browsing for the video file, and clicking “Upload Video.” Be sure to edit the video before uploading it to YouTube. Videos must be no larger than two gigabytes in size and no longer than 10 minutes in length. There is no cost to use YouTube.

Source: American Health Care Association and Mashable.com.

ticular facility, don't use it and wouldn't be effectively reached through social media. "The idea that older adults are not using social media is false," says Cruickshank. "Facebook currently has over 10 million users aged 55 and over. That number will only go up—especially as grandparents realize how easy

it is to communicate with their grandkids on Facebook and MySpace."

Further, research indicates baby boomers and the younger members of the previous generation are turning to social media to help them make purchasing decisions and to find health care information.

"Social media sites are how these decision makers will make their decisions," says Cruickshank. "They will want to read the reviews and comments of other people describing their experiences" with the long term care facility, he says.

Macy agrees. "Fifty to 65 is a very active online audience for health care research and understanding what they want to do with their parents," she says.

A study conducted in June 2009 by Cable & Telecommunications Association for Marketing found that 71 percent of seniors aged 65 and older go to the Internet to look up health and medical information, among other things, and that 39 percent of baby boomers regularly go to social networking Web sites, forums, message boards, and chat rooms.

A study published a year earlier conducted by New York City-based ThirdAge, which researches the media and marketing habits of baby boomers, found that 97 percent of boomers go to the Internet for health care information. In making decisions, their findings indicate boomers value word-of-mouth recommendations, expert opinions, and trusted brands. "They relate to people sharing a similar life phase—and they trust those who have walked in their shoes," said ThirdAge CEO Sharon Whiteley.

A more recent ThirdAge study, conducted between July and August 2009, found that the Internet is playing an increasingly important role in the lives of boomers caring for sick or elderly loved ones. A majority indicated that they seek or plan to seek resources and information on caregiving online; 20 percent said they would turn to social networking sites dedicated to this topic.

"This is an important measure of where people seek information, support, and advice and shows that today's midlifers are proactively seeking solutions online, even for these sensitive, emotionally charged family health care issues," said Whiteley in a statement.

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tors at long term care communities are taking note.

“It’s an amazing phenomenon, and it’s something we all need to be part of because that’s where the conversation is taking place,” says Bonnie Polishuk, director of marketing for the Los Angeles Jewish Home.

Many Providers Cautious

Despite the increase of social media use by baby boomers, many long term care companies are cautious about using the sites to reach decision makers.

“The use of social media in the seniors housing industry is in its infancy,” says Liz Bush, senior vice president of marketing and sales at Life Care Services (LCS), Des Moines, Iowa. Using social media in a variety of ways is under discussion at LCS, but has yet to pass the discussion stage. “Use of or work with social media to promote communities is limited to a few pioneers,” she says.

Macy thinks long term care companies will increasingly turn to social media to reach their stakeholders. She likens it to Web sites. Ten years ago, companies weren’t sure that they needed one, but “then there was a tipping point where everybody had a Web site. And now it’s a regular business process,” she says. “We’re at this place where there’s a real transition occurring, and it’s very exciting.”

Most of those who see the value in using social media are proceeding with caution.

“We really just got our main Web site where we want it within the last year or so,” says Tom Kranz, public relations director of Chelsea Senior Living. “The company’s been kind of slow moving in that area. In terms of social media, the approach will be slow and careful. Privacy and security of our residents comes first; marketing comes second. I think we’ll do more [with social media], but we’re not rushing into it.”

Those who ignore social media do so at their peril, say experts, and long term

care providers are beginning to heed the warning.

“These networks are changing the way people learn and make decisions,” says Michael Smith, corporate director of public relations for ACTS Retirement-Life Communities, a not-for-profit aging services organization.

“Your brand is no longer what you say it is, it’s what others say it is,” he points out. “And social media helps you learn a great deal about your stakeholders and their priorities—how they make decisions and what they value.”

Smith says some people at ACTS were a little skeptical at first about

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using social media, “and that’s natural. Any time something new appears there’s a little skepticism involved as far as what the impact will be,” he says. “But now that social networking has gone mainstream, it’s seen more as a necessity and embraced as a marketing tool.”

Start With A Strategy

So social media is a good tool for reaching baby boomers who will, at some point, likely need to look for a long term care facility of some kind for their parents. But should a company just start setting up accounts with the various platforms?

Start with a plan, experts advise.

Providers should “build a [social media] strategy just as any marketing strategy, and understand that these are simply new distribution [forums] for the branding message,” says Macy.

Begin with learning about social media and how it works. Answer questions such as who are you trying to reach, what are you trying to accomplish, how are you going to accomplish it, who is going to do the work, what sort of policy or guidelines do you need to develop to keep everyone on track and protect the company legally, and how are you going to measure your effectiveness?

Eric Schubert, vice president of communications and public affairs for Ecumen, a faith-based provider of seniors housing from independent living to long term care based in Shoreview, Minn., says asking those questions is essential. “Why do you want to use it, and how are you going to use it?” says Schubert. “We just threw a Facebook page up there and didn’t answer those questions,” and the page was not successful.

When determining who to reach through social media, certainly include families and baby boomers, but consider other stakeholders, too, such as informal caregivers, people with disabilities, referral sources, potential donors, residents, current and potential

TOP 10 ONLINE DESTINATIONS FOR PEOPLE 65+ IN NOVEMBER 2009 (United States)

RANK	SITE	65+ AUDIENCE (MILLIONS)	% OF TOTAL SITE AUDIENCE
1	Google Search	10.25	7.7
2	Windows Media Player	8.24	10.9
3	Facebook	7.95	7.2
4	YouTube	7.67	8.4
5	Amazon	5.68	9.3
6	Yahoo! Mail	5.64	7.8
7	Yahoo! Search	5.58	8.7
8	Yahoo! Homepage	5.38	6.8
9	Bing Web	4.51	10.1
10	Google Maps	4.40	8.4

Source: The Nielsen Co.

employees, the media, and legislators, experts say.

ACTS’ strategy involved “creating goals, creating content, measuring our efforts, understanding challenges and risks in managing social media, and having some guidelines in place for our employees when posting on behalf of the corporation,” says Smith. “We want to drive traffic back to our Web site where people can learn more about our company and the services we provide, and ultimately be a lead generator,” he says.

“The key point I wanted to make is we view social media as a complement to the other forms of outreach,” Smith says. “It doesn’t replace other means of relationship-building with residents, families, and other stakeholders; doesn’t replace the personal visits, e-mail, direct mail, ads, events, and public relations efforts,” he says. “The key is integrating the benefits of engagement and listening and dialog that these networks provide with a broader communications strategy.”

Also important to consider is who will be doing the work of maintaining the social media sites. To be effective, someone will have to consistently and frequently post content to these sites.

“It does take time to maintain and to use,” says Schubert, “and so I think it’s

helpful to really figure out who’s going to be operating that and how does it fit into your overall strategy.”

Macy recommends going to an expert when it comes to rolling out the company’s presence in social media. “You’ve spent thousands of dollars, maybe millions of dollars, building your brand. Don’t turn [social media efforts] over to an intern.”

But many long term care companies, like Ecumen, prefer to keep that work in-house.

The Jewish Home has hired a full-time employee whose sole focus is social media, says Polishuk. This employee will maintain the Facebook and Twitter pages. He’ll send out tweets (messages) and news releases and come up with strategies to generate traffic and interest.

Learning How To Use Social Media

Before launching any content on social media sites, spend some time getting familiar with the various sites and determining who will be best reached by which site.

For example, if the purpose is to recruit professional staff, look at LinkedIn, which is a social networking site for professionals. With LinkedIn, after creating a profile an approach might be to join long term care-related

groups to begin to foster relationships that may result in an optimal hire.

If the purpose is to make senior staff available as subject matter experts, an approach might be to start a blog. Readers of the blog may ask questions that the expert could answer. But before starting a blog, spend time reading what's already out there. Figure out how to differentiate the company's blog, or make it more valuable than what's already available. See how blogs are written and how reader comments are handled.

Blogs are also a great tool for communicating with residents and families, says Brian Purtell, an attorney and director of legal services for the Wisconsin Health Care Association. "I don't think people know how simple it is to set up a blog that would allow them to give residents and family members real-time updates about facility news and information," he says. Newsletter information "isn't particularly relevant by the time it comes out."

Compare that with a blog that family members subscribe to—and to which access is limited—in which a provider can, for example, remind family members of an event like a family picnic that is going to happen in the very near future, he says.

If the purpose is to keep staff at a number of facilities informed of what's going on in the profession, maybe Twitter would be an option. Content on that particular site must be limited to 140 characters, so "tweets" could share links to articles of interest on the Web, for example, along with encouraging brief conversations among staff to make them feel more like a community.

If the goal is to keep family members informed of what's happening at a facility, The Worthington's experience shows that Facebook or MySpace may be a good option, and they have the added benefit of introducing family members to each other and allowing

them to create community amongst themselves. "Families really like it," says Kranz.

Going The Group Route

Fraser recommends that administrators—or the designated social media person—set the page up as a "group" rather than as an individual or fan page. "I first tried to set it up as a 'person,' but then there were warnings from



Facebook that 'if you are a business and sign up as a person you'll be in big, big trouble,'" says Fraser.

"So I tried as a fan page, but realized that anyone could access your page and post comments. With the way team members come and go in this industry, the thought of sour employees posting bad things was too risky. So I found the 'group' arena and set us up as a closed group with permission needed to join or access it."

To encourage family members to join the group, Fraser sent out a flyer with her monthly "family packet" and mentioned it in three consecutive family letters. "Now I mention it every couple of months, and we include it in our family orientation packet," she says.

If the purpose is to get people to actually look at the facility so they can see how nice it is, then Flickr, a photo-sharing site, or YouTube, a video-sharing site, may be the best bet. Those sites are also good for publicizing images of a recent event.

To connect family with residents more effectively, consider using Skype, a free video call application using the Internet. "We can enhance quality of life by having laptops available so [residents] can do a Skype call" with their loved ones, says Purtell.

To reach baby boomers, do a Google search on "social media sites for baby boomers," which will pull up a list of such sites, like Eons.com, targeted directly to this population, Purtell says.

Whatever the goal, chances are a social media site or application exists that will meet the need.

If Cruickshank could give providers one piece of advice about social media sites, it would be, "Don't be afraid of them. Many people, especially those who grew up before the age of the Internet, are worried that this medium has already passed them by," he says. "They couldn't be more wrong. Social networking sites are designed to be simple. Starting a Facebook page takes a mouse, a keyboard, and about four minutes. Don't be afraid of something that is designed to be easy. Try it out. You might even like it."

Taking The Plunge

Ecumen is significantly involved in social media and first got involved in it three years ago when it was still very new. Today, the company regularly posts on Twitter, Flickr, LinkedIn, and YouTube and has three blogs.

Schubert had several reasons for getting Ecumen involved in social media, particularly blogging. "I'm kind of a media junkie," admits Schubert. Back before launching the company into social media, he kept seeing so many "neat stories" on senior services and

noticing the many interesting things that the profession was doing. He began “looking for an outlet to share that information [with] other people who might be interested in the subject. So blogging really seemed to be a good vehicle for us.”

The first blog the company launched on its Web site, “Changing Aging,” provides news, ideas, and opinions relating to innovation in senior services. Two years later, divisions within the company added another two blogs: one provided by their clinical consulting division, which acts as a nursing facility help desk, and one produced by their development division, which is targeted to people who are considering developing seniors housing.

The blogs also help cohesion within the company, which has 80 locations in five states. They “allow our employees to learn more about things that may be happening within Ecumen or the profession or aging and senior services.”

ACTS is rolling out a new Web site in the first quarter of this year that will integrate a good deal of social media.

The company currently is active with Twitter and plans to roll out Facebook, LinkedIn, a YouTube channel, podcasts, a blog, and lots of video and audio to coincide with the redesign of its Web site, Smith says. “Also in the works are portals with resident-generated content, offering the ability to connect with other ACTS residents and family members, view in-house television, and [other] content.”

“We envision all of these platforms are going to help us have a dialog and a free exchange of ideas with our stakeholders, as well as greatly enhance our brand awareness and recruitment efforts,” he says.

Social Media As A Marketing Tool

Most every business nowadays is looking at how social media can be used to market goods or services to consumers, referral sources, and peers, says Macy.

Macy didn’t have statistics on how effective social media marketing is for



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the long term care profession, but data are coming out about how social media marketing is doing for other industries, she says. "In the auto industry, JD Powers released at the end of 2009 [data showing that] social media is driving marketing for consumers more so than print ads, that word-of-mouth marketing is more powerful than ever."

Providers in the long term care profession are just beginning to evaluate advertising on social media sites.

Social Media And Advertising

Kranz has just placed his first Facebook ad for Chelsea Senior Living. These are small ads that appear on the right sidebar of an individual's Facebook page. "You pay per click on the ad, which then redirects the viewer to the main Chelsea Senior Living Web site," says Kranz. "I went with a very low-budget plan, just to see initially what the response is."

Sherman advertises on Facebook

because Facebook told her 80 potential people were out there who would be interested in her advertisement, but she only gets about two hits on her ad a month, she says. None of the hits have led to new residents.

But according to Vicki Rackner, MD, president of The Caregiver Club, a Web-based social networking community for family caregivers out of Mercer Island, Wash., plenty of caregivers could benefit from appropriate information provided to them via social media sites, and, if done right, learn to trust the company that provides it.

In getting The Caregiver Club off the ground, Rackner relied heavily on social media, especially blogs and videos. "I've been amazed at the results," she says. "Last night I posted a little video. This morning it is No. 1 out of 3 million." She thinks videos are particularly effective because she believes the country is moving toward being a video-based society.

Rackner, a physician and an informal caregiver, has a good idea of what such caregivers want and need. She posted a video about how to talk to your doctor, and that video got more hits than millions of other similar videos.

"If I can learn how to do this, anyone can do this. They can make their own videos. It's so easy to buy the latest Kodak camera and upload the videos to YouTube and other sites," Rackner says.

"The Internet works beautifully for [caregivers] because they experience isolation, and it's a chance to get connected," Rackner says. And it's equally valuable for the people the caregivers are caring for, she says. "Pain plus isolation equals suffering. Even if you can't go out, [with social media] you're not alone, and that's hugely, hugely helpful for caregivers and the people for whom they care."

Benefits To Staff

Staff at far-flung facilities have something in common—the challenges and rewards of caring for people who are elderly or have disabilities. Social net-



REVAMP POLICIES, TRAINING

Providers may rely on existing privacy policies and related training programs to protect them in the Web 2.0 age, but experts say they may not go far enough.

"One of the challenges we faced [was] our staff who are from the millennium generation, the younger staff, they have their cell phones with them all the time," says Vicki Loucks, vice president of quality services for Redstone Highlands Senior Living Communities, a Pittsburgh-area continuing care retirement community. "They would take photos of residents and put them on their Facebook pages. They didn't mean that in a negative way; [social media is] what they do with their lives. So we had to educate our staff on

the appropriate use of social media," she says, "and then we made that part of our employment policy."

A number of news stories, some that went national, have featured front-line staff taking photos of residents and posting them on their social networking pages, says attorney Purtell. "I had a client that got wind that one of the staff members had snapped a photo with a camera phone. The resident had food on her face, and [the staff member] posted it with 'Aren't I a good feeder?'" as the caption. "We don't want this to continue. We're asking all providers to become more versed as to these risks and to enhance privacy training to incorporate present realities," says Purtell.

"Frankly, if you haven't updated [your policies] in the last three years, you should conduct a review," Purtell says. "Much privacy and confidentiality training was designed long before everyone carried a cell phone that doubles as a camera and everyone was on Facebook, Twitter, etc. You would be foolish to try to tell your employees 'Don't use social media;' rather, you need to adjust your message along the lines of, 'Here's something important: the same restrictions that we've instilled in you [regarding resident privacy] apply on the Internet.'"

Consider specific policies to address hand-held devices. "It's not unreasonable to indicate that unless there's a specific reason and specific authoriza-

working could provide them with a community from which they could learn and receive support.

“Certain questions that may come up in one assisted care facility are probably common in a lot of them, so social networking would be a very good fit in these kinds of facilities,” says Testa. “It may be more efficient to communicate electronically than it would be via telephone.”

Another use for social media in long term care would be to set up a private social network—one to which only staff have access. One way it could be used is as a “central depository,” says Testa. “Say there’s some type of procedural list, anything the staff would have to turn in paper form. It can be put into [a private] social media context. Let’s say there’s a list of procedures to follow when an injury occurs, and it’s kept in a three-ring binder at



Some providers use social media as a tool for keeping family members engaged and informed.

all the nurses’ stations. You could post that,” and key staff members could review it and add suggestions, video of correct procedures could be posted to it, and the facility could thereby develop something much more comprehensive than the original list.

Social media could be valuable for quality care, he says. “It’s the middle of

the night. You have a skeleton staff over the holidays. Someone falls. What’s the procedure to follow? That answer could be on your social network. The staff member could search on ‘fallen patient’ and it would pull up what to do with a fallen patient and a list of people who should be contacted with not only their cell phone number but also their chat address, and staff could have an electronic group discussion about the situation.”

That may be in the future for most long term care facilities, but “the nice thing about the future is that it’s constantly

being shaped by the people of the present,” says Cruickshank. “The more interesting question is: What do long term care companies want the future of social media to be? Let’s go from there.” ■

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tion, no one should be carrying a phone in their pocket at work,” says Purtell. “Also, you’re paying them to work, not to text their friends.”

Not having a good policy that includes social media, or not thoroughly training staff on it so that the above-mentioned violations occur, could result in criminal or civil liability, violate the Health Insurance Portability and Accountability Act of 1996, and may constitute caregiver misconduct, according to guidelines issued by Wisconsin’s Department of Health.

These guidelines recommend that providers’ policies include the following elements:

- Specify that cell phones, personal digital assistants, cameras, and other

personal devices are never to be used to record images of residents. If the provider needs a photo of a resident for the purpose of care or training, only authorized people using equipment specified in the policy should take the photo.

- Make clear that photos of residents taken by authorized individuals are the property of the facility or company and that distributing them without written authorization is prohibited.

- State where in the facility, and under what circumstances, personal cell phones and other personal devices can be used, such as on breaks or outside.

- Tell residents, family members, and visitors about privacy issues and that taking a photo of the resident and

posting it online would be a violation of privacy.

- Make clear what the consequences are for failing to abide by the policy.

- Train all staff, including temporary staff and volunteers, on the policy.

Cruickshank’s firm has developed a social media policy that would be useful to a company looking to develop its own or incorporate elements of one into its existing policies. Cruickshank says he would be happy to provide the sample policy at no charge to *Provider’s* readers. To obtain a copy, call Cruickshank at (281) 833-2200 or e-mail him at jcruickshank@alaniz-schraeder.com.