

Revision of Policy 57– Social Media

Background:

CBH staff have reviewed the CBH Social Media Policy (Policy #57) and are pleased to recommend revisions to the Board of Directors for review.

A primary theme of the recommended changes is the movement of several portions of the Policy to the level of procedure. These changes are made without compromising the intent or integrity of the Policy itself.

This policy and accompanying revisions have been reviewed and endorsed by the agency’s lawyer, Pat McDermott.

Summary of Changes:

Current Social Media Policy	Proposed Changes to Policy
Policy Statement CBH may consider participating in social media to reach a broader audience.	Deleted statement - CBH has been utilizing social media since 2023.
Agency Usage listing of social media accounts	Added LinkedIn account
Agency Usage - Statement The Development and Communications Department is responsible for monitoring all CBH accounts on social media sites and will respond to and correct any identified misinformation.	Revised Statement The Development and Communications Department is responsible for monitoring all CBH accounts on social media sites while the Human Resource Department is responsible for monitoring the CBH LinkedIn account. Both departments will respond to and correct any identified misinformation respectively.
Agency Usage Statement CBH’s use of social media must comply with any applicable federal, state and local laws and regulations, including copyright and fair use requirements, records	Deleted statement – Moved under Legal/Regulatory References

Action Item X-#

retention, Virginia Freedom of Information Act, constitutional free speech protections, HIPAA, privacy laws and information security policies established by the localities served	
There are no other changes from the 2/2024 approved Plan.	

Motion from the CBH Executive Committee:

That the Board approve the revisions to the Social Media policy as presented.

COLONIAL BEHAVIORAL HEALTH

COUNSEL REVIEW OF BOARD POLICY

Name of Policy: Social Media
Category: Organization
Policy No.: 57

Review Date: February 20, 2026

Name of Counsel: Patrick B. McDermott, Esq.

Comments of Counsel:

- 1. Virginia Code Compliance:** Up to date, No Violations
- 2. Federal Law Compliance:** Up to date, No Violations
- 3. Grammer and Punctuation:** Acceptable
- 4. Comments:** None

Patrick B. McDermott, Esq.

Signature of Counsel

Policy and Procedures

Category: Organization
Title: Social Media
Policy Number: 57
Primary Areas Affected: CBH Organization

Policy Statement.....	2
Agency Usage.....	2
Employee Personal Usage.....	3
Compliance and Enforcement.....	4
Source of Authorization	4
Legal/Regulatory References	4
Definitions	5
Diary of Changes	6
Date of Origin	6
Dates of Review	6
Dates of Revision	6
Approved By	6

Policy and Procedures

Category:	Organization
Title:	Social Media
Policy Number:	57
Primary Areas Affected:	CBH Organization

Policy Statement

Social media is an umbrella term referring to internet-based tools that integrate technology, social interaction and content creation. Social media tools come in many forms, such as blogs and social networking. The purpose of engaging in social media is to address the fast-changing informational landscape and the way the individuals we serve, the individuals' families, individuals seeking services, partners and stakeholders communicate and obtain information online.

Only the Development and Communications Department or its designees may use social media to conduct business. The Development and Communications Department is responsible for monitoring all CBH accounts on social media sites while the Human Resource Department is responsible for monitoring the CBH LinkedIn account. Both departments will respond to and correct any identified misinformation respectively. The Development and Communications Department will include any planned social media usage in the agency's marketing plan.

Agency Usage

At this time, CBH maintains the following social media accounts:

- External website at www.colonialbehavioralhealth.org
- Facebook account at www.facebook.com/ColonialBehavioralHealth/
- Instagram account at <https://www.instagram.com/colonialbehavioralhealth/>
- YouTube account at www.youtube.com/user/colonialbh
- LinkedIn account at <https://www.linkedin.com/colonialbehavioralhealth>

Policy and Procedures

Category:	Organization
Title:	Social Media
Policy Number:	57
Primary Areas Affected:	CBH Organization

CBH maintains a Survey Monkey account for the purpose of conducting meaningful and relevant surveys of individuals served, individuals' families, partner agencies, stakeholders and CBH staff. This account is also used as an invitation and registration tool for internal and external events.

The Development and Communications Department will train any authorized employees in representing CBH in a professional manner and that adheres to business norms and mores on social media sites.

Employee Personal Usage

When engaging in social media for personal use, staff should refer to their own personal and professional ethics.

Additionally:

1. While an employee's free time and personal equipment are generally not subject to any restrictions by CBH, the agency urges all employees not to post information about CBH or their jobs which could lead to morale issues in the workplace, or which could detrimentally affect the agency's interest.
2. Employees may not use CBH email addresses for personal social media sites or other non-work-related sites.
3. Employees may not engage with individuals currently or formerly receiving services. Employees may not send or accept friend requests from individuals currently or previously receiving CBH services. This policy extends to individuals' caregivers and guardians. Information published on social media sites directly or indirectly relating to any aspect of work must comply with the CBH confidentiality statement, HIPAA and the Code of Ethics.

Policy and Procedures

Category: Organization
Title: Social Media
Policy Number: 57
Primary Areas Affected: CBH Organization

4. When communicating with other CBH employees through social media, all policies regarding confidentiality, harassment and discrimination must be followed.
5. If the employee makes a statement about CBH while engaging in social networking, the employee must specifically identify the statement as their personal opinion. To preserve the agency's goodwill among partners, stakeholders, regulatory bodies, referral sources, families and others, employees may not claim or imply any statement is the opinion of the agency.
6. CBH reserves the right to discuss with the responsible employee any questionable material posted to a social media site.

Compliance and Enforcement

Employees must immediately report violations of this policy to their program manager or supervisor, and to the Director of Human Resources and the Director of Information Services. All program managers and supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to, and including, termination from employment, professional discipline and criminal prosecution in accordance with CBH's Personnel, Human Rights and Privacy policies.

Source of Authorization

Board of Directors

Legal/Regulatory References

Federal Statues

Americans with Disabilities Act

Policy and Procedures

Category: Organization
Title: Social Media
Policy Number: 57
Primary Areas Affected: CBH Organization

Federal Trade Commission Act Section 5, 15 U.S.C. 45, Unfair or Deceptive Acts or Practices in or Affecting Commerce

Federal Trade Commission Act 16 CFR Part 255, Endorsements and Testimonials in Advertising
Health Insurance Portability and Accountability Act of 1996 - 45 CFR Part 160 and 164 (HIPAA: Privacy, Security, Enforcement and Breach Notification Rules under HITECH Act)

State Statues

Virginia Code 18VAC85-20-30, Advertising Ethics

Virginia Code 12VAC30-130-2000, Marketing Requirements and Restrictions

Virginia Department of Medicaid Assistance Services, Marketing Requirements

Virginia Freedom of Information Act

Other

Web Content Accessibility Guidelines WCAG 2.1, international digital standards for accessibility

Definitions

Social Media – internet-based tools that integrate technology, social interaction and content creation

Examples: Facebook, Instagram, LinkedIn, TikTok, X (formerly Twitter), Threads, You Tube

Policy and Procedures

Category: Organization
Title: Social Media
Policy Number: 57
Primary Areas Affected: CBH Organization

Diary of Changes

Date of Origin

04/28/2011

Dates of Review

03/03/2026	02/20/2026	02/23/2024	12/18/2023	08/04/2023
03/07/2022	10/20/2020 – COVID 19 PROTOCOL		06/24/2019	10/20/2016
10/20/2015	06/03/2013			

Dates of Revision

03/03/2026	02/20/2026	12/18/2023	08/04/2023	03/07/2022
06/24/2019	10/20/2016	10/20/2015		

Approved By

	<u>04/07/2026</u>
Signature	Effective Date
<u>Ryan Ashe</u>	<u>CBH Board Chair</u>
Printed Name	Title