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This document was created in consultation with communicators at the University of Arizona College of Medicine – Tucson (COM-T), as well as individuals representing the COM-T Dean’s Executive Committee, University of Arizona Health Sciences Office of Communications, University of Arizona Campus Brand Engagement, University of Arizona HIPAA Privacy Program, University of Arizona Institutional Review Board, University of Arizona Office of the General Counsel, and Banner University Medicine. Communicators at several other medical schools generously shared their policies, guidelines, and worksheets to help us seek alignment with social media practices at other AAMC-member institutions.

We would like to acknowledge and thank the members of the COM-T Social Media Working Group, whose input helped form the below document:

- **David Bruzzese**, COM-T Brand Communications
- **Anna Christensen**, COM-T Brand Communications
- **Jennifer Fischahs**, Department of Medical Engineering
- **Elizabeth Jeffrey-Franco**, Sonoran Center, Department of Family and Community Medicine
- **Jamie Manser**, Department of Psychiatry
- **Olivia Miltner**, Department of Surgery
- **Darci Slaten**, Department of Family and Community Medicine
University of Arizona College of Medicine – Tucson
Introduction to Social Media Usage

Thank you for your interest in using social media to support the mission of the University of Arizona College of Medicine – Tucson ("College" or "COM-T"). Please familiarize yourself with COM-T's Social Media Policy ("Policy") and Social Media Guidelines, Procedures, and Processes ("Guidelines") to be aware of the rules and strategies governing social media use at COM-T.

Social media is an important and powerful communication channel that allows the College to directly interact with key audiences. As with other forms of communication, content shared on the College’s social media accounts reflects the College’s and, by extension, the University’s brand. Therefore, managers of the College’s social media accounts assume responsibility not only for communicating on behalf of the area they represent, but for the College and the University. In essence, social media account managers act as ambassadors of the College and the University. This responsibility is significant and requires adherence to the College’s social media policy, guidelines, procedures, and processes, as outlined in this document.

Alignment: Mission and Core Values

The COM-T Brand Communications Team works with communicators across COM-T to ensure social media channels are in alignment with the College’s mission. Social media is expected to leverage original content to promote the COM-T brand among its audiences, including, but not limited to, current and prospective students, staff and faculty; donors and prospective donors; members of the public; alumni; and the news media. Social media encourages faculty, staff, student, alumni, and community engagement with the College, for example by fostering collaboration, mentorship, and pride. Content must uphold the University of Arizona’s core values of integrity, compassion, exploration, adaptation, inclusion, and determination. For example, posts should reflect the variety of faculty, staff, and students at COM-T and its departments, centers, and offices.

Social media accounts not approved by the COM-T Brand Communications Team are not considered official accounts of the College and may not speak on behalf of COM-T or any department, center, division, or office thereof. The COM-T Brand Communications Team can deny approval of proposed social media accounts, and, with the backing of the Dean’s Executive Council if necessary, can rescind approval from any existing social media accounts that fail to comply with the below Policy and Guidelines. In these cases, the COM-T Brand Communications team is committed to supporting alternate strategies for disseminating important messaging to appropriate target audiences.
Social Media Policy

This Policy describes the rules for use of official COM-T social media accounts to ensure that any social media channel speaking on behalf of COM-T complies with applicable laws and College and University policies. As detailed below, official COM-T social media accounts are obligated to comply with University, University of Arizona Health Sciences (UAHS), and College brand standards, including language, images and graphics; laws; marketing and communications strategies; and standards of professionalism.

1. Any social media account that currently or in the future will communicate on behalf of the College (including one of its departments, centers, offices, divisions, or other units) must be approved by the COM-T Brand Communications Team in conjunction with UAHS. Approved social media accounts are considered official COM-T accounts. Any account that represents a department, center, division, office, program, or other unit of the College is considered to be communicating on behalf of the College.

2. Any social media account that communicates on behalf of COM-T or one of its departments, centers, offices, divisions, or other units, is owned by the College. The COM-T Brand Communications Team has the authority and responsibility to monitor any communications made on behalf of the College, and can disapprove of any social media content or communication strategy. Per UAHS guidelines, social media account and login information, including usernames and passwords, must be kept current in UAHS’s encrypted system and may not be changed without notifying the COM-T Brand Communications Team and updating UAHS’s encrypted system.

3. Official COM-T social media accounts must be registered with the [secure] UAHS Social Media Directory, including the names and contact information of account managers. The director of social media at UAHS must be notified by the COM-T Brand Communications Team or account managers of any changes to login credentials or other account information.

4. Groups or initiatives below the department, center, or office level, such as divisions within departments, may not be eligible for discrete social media accounts, except in specific circumstances that warrant a clear need that cannot be met through existing accounts.

5. Official COM-T social media accounts must have a minimum of two account managers, both of whom are University employees, not residents or student workers. Account managers should be regular University employees, as defined by HR. As the principal content creators, primary account managers must attend regular College-wide social media strategy meetings, and must submit annual communication plans and metrics reports.

6. Official COM-T social media accounts must comply with all applicable College and University policies, state and federal laws and regulations, and University branding standards.

7. Official COM-T social media accounts must not communicate sensitive personal or confidential information as defined by the Family Educational Rights and Privacy Act (“FERPA”) and/or the Health Insurance Portability and Accountability Act (“HIPAA”). Any such information communicated via an official COM-T social media account, either privately or publicly, must be removed by an account manager as soon as possible after discovery. The account managers must promptly provide a summary of the incident to the COM-T Brand Communications Team, which may notify and involve the University’s Office of the General Counsel. Before deleting the post, document the violation with a screen shot, which can be sent to the COM-T Brand Communications Team in an encrypted email (add [secure] to the beginning of the subject heading).
8. The COM-T Brand Communications Team will provide at no cost access to FERPA and HIPAA training programs for all social media account managers. Social media account managers must submit documentation of successful completion of FERPA and HIPAA training programs.

9. Official COM-T social media accounts must not communicate confidential information, such as intellectual property, personnel information, or passcodes. Sharing via social media channels any information that could compromise the security of any University facility or confidential data is prohibited. Please be aware that anything posted online is public information.

10. Official COM-T social media accounts must not be used to recruit human subjects for clinical trials and other studies without approval from the Institutional Review Board of record.

11. Official COM-T social media accounts must be updated regularly. Accounts with insufficient updates or maintenance will be considered abandoned and may be closed.

12. Account managers will respond promptly to inquiries from the COM-T Brand Communications Team.

13. COM-T, via its official COM-T social media accounts, reserves the discretion to delete, hide, or prohibit any comments, messages, or other communications on any social media channels that contain: obscene speech; child pornography; fighting words; defamatory speech; true threats; incitement to unlawful action; commercial speech; speech that constitutes illegal activity, including but not limited to harassment or blackmail; speech that infringes intellectual property rights, including but not limited to copyright or trademark infringement; and/or spam, off-topic posts, or repetitive comments.

14. Official COM-T social media accounts may not be used to harass, intimidate, discriminate, or otherwise engage in uncivil, unethical, or illegal behavior, nor may they be used to endorse such behavior (e.g., in the form of responses to other users’ posts or content).
Social Media Guidelines, Procedures, and Processes

Used as part of a larger communication strategy, social media is a powerful tool that can bring people together, create awareness, and influence people’s thinking. By creating an account affiliated with the University of Arizona and the College of Medicine – Tucson, you are leveraging the credibility and trust our audiences have for a public institution of higher education. Therefore, you also have a responsibility to uphold that established brand and reputation.

Behind the scenes, social media requires effort — not just in (1) creating compelling content, but also in (2) building a responsive communication strategy and (3) analyzing metrics to inform that strategy. To protect the College’s and University’s reputations, social media account managers, as de facto COM-T spokespersons and ambassadors, must demonstrate familiarity with all three of these dimensions. At COM-T, having and managing a social media account is a privilege that comes with obligations and accountability, and account managers are expected to follow best practices.

By following the below guidelines, you will be laying the groundwork for your future social media success. Through experience and evidence, you will learn which approaches are most effective, allowing you to hone your messages and reach wider audiences. As a COM-T social media account manager, you will also be welcomed into a supportive community that can help you shape your strategy, and you can also benefit from shared content and collaboration.

Maintaining an effective social media presence is hard work and building an audience can take years. Before you make a request to open a new social media account, review this document to learn what is involved in account maintenance. If you believe you have the resources necessary to maintain an account on behalf of your department, center, or office, continue reading to learn how to request a new social media account.

If opening a new social media account isn’t the right avenue for your team at this time, COM-T has many opportunities for sharing your messaging. COM-T has Facebook, Twitter/X, Instagram, and LinkedIn accounts with large audiences, and many departments and centers have their own social media channels as well. Messages can be shared in the internal MedCat Connect newsletter, and announcements and events can be promoted on Health Sciences Connect.

Before You Start: Necessary Resources to Support a Social Media Account

Social media accounts need primary and secondary account managers, both of whom must be regular employees (not student workers, residents, or independent contractors). The primary account manager is the principal content creator, and the secondary account manager acts as their back-up. Upon employment separation (e.g., resignation or retirement), account managers must ensure the COM-T Brand Communication Team and UAHS have up-to-date login information.

Eligibility to Open a Social Media Account

Anyone communicating via social media on behalf of a COM-T center, department, or office is required to go through the approval process and uphold all expectations, detailed below. Accounts are required to comply with University of Arizona social media branding guidelines, such as using a UAZ prefix and Block A logo.

Per UAHS social media guidelines, the primary account manager must be a regular University employee. Therefore, any social media account that communicates on behalf of the College cannot be primarily overseen by students, medical residents, independent contractors, or other individuals who are not classified as regular employees. Student- and trainee-led groups that do not communicate on behalf of a COM-T center, department, or office, and by extension UAHS or the University, are not subject to these
guidelines, procedures, and processes. To prevent the appearance that such groups represent COM-T in an official capacity, they may not use the Block A logo and must prominently feature a disclaimer, such as “Views are our own” or “This account is not endorsed or sponsored by the University of Arizona College of Medicine – Tucson.” It is highly recommended that student-led social media accounts are deleted once a group disbands or graduates.

Groups below the department, center, or office level, such as divisions or programs within departments, are not eligible for social media accounts, except in extraordinary circumstances that warrant a clear need for these channels. These groups are expected to use existing departmental-level, center-level, or College-level social media accounts and other channels to disseminate messaging.

The Role of the Primary Account Manager

To protect the College’s brand’s reputation, primary account managers are required to have the basic skills necessary to oversee an effective and engaging social media presence.

<table>
<thead>
<tr>
<th>Attributes of a Primary Social Media Account Manager</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Regular employee (not a student worker, medical resident, or independent contractor) with a NetID</td>
</tr>
<tr>
<td>• Designs and implements social media strategy to align with institutional goals</td>
</tr>
<tr>
<td>• Regularly generates, edits, publishes, and shares engaging content (original text, photos, graphics, videos, or news items)</td>
</tr>
<tr>
<td>• Maintains a content calendar</td>
</tr>
<tr>
<td>• Has familiarity with the larger COM-T social media landscape</td>
</tr>
<tr>
<td>• Thoughtfully collaborates with other COM-T social media managers to ensure coordinated messaging and brand consistency</td>
</tr>
<tr>
<td>• Attends COM-T social media strategy meetings</td>
</tr>
<tr>
<td>• Communicates thoughtfully and respectfully with followers, responds to queries in a timely manner, and monitors comments</td>
</tr>
<tr>
<td>• Oversees social media accounts’ design (cover photo, profile picture, etc.)</td>
</tr>
<tr>
<td>• Stays abreast of, and maintains proficiency in, current technologies and trends in social media (such as hashtag use and tagging), design tools (such as Photoshop), and applications (such as Sprout and other third-party social media management tools)</td>
</tr>
<tr>
<td>• Has basic proofreading and editing skills to ensure quality of content</td>
</tr>
<tr>
<td>• Is familiar with UArizona, UAHS, and COM-T branding, accessibility, and style guidelines</td>
</tr>
<tr>
<td>• Is familiar with FERPA and HIPAA guidelines to protect student and patient privacy</td>
</tr>
<tr>
<td>• Is familiar with Banner’s purview over the clinical realm</td>
</tr>
<tr>
<td>• Maintains security of account with strong passwords, uses two-factor authentication when practical, does not share login information without approval from the COM-T Brand Communications Team, and keeps login information current with the UAHS social media team</td>
</tr>
</tbody>
</table>

Before their first social media account is approved, prospective primary account managers will be asked to list previous social media experience, along with links to prior social media campaigns or content. All account managers will be asked to submit documentation of FERPA and HIPAA training (e.g., FERPA For Non-Instructors, FERPA Training For Instructors and Instructional Support Teams, and CITI Health Information Privacy and Security, which are all available through EDGE Learning).
As the principal content creators and communication strategists for their channels, primary account managers are expected to be responsive to inquiries from the COM-T Brand Communications Team and attend regular social media communications meetings, and are responsible for monitoring social media channels; creating content; complying with laws, regulations, and policies; and overseeing others who support day-to-day social media management. They need to be aware of communication priorities at the College level and will coordinate with other social media account managers on college-wide and inter-departmental campaigns. They are also expected to compile an annual metrics report and update their social media communications plan annually.

Secondary account managers are regular employees who act as back-up for primary account managers in the event of illness, vacation, or other absences. If they have the above-listed attributes of a primary account manager, they may create and publish content; otherwise, they may create content and submit it to the primary account manager for approval. They may perform other duties, such as monitoring social media channels, taking photos or creating graphics, or assisting in the preparation of communication strategies or metrics reports. To encourage cross-training of staff, they are welcome to participate in regular social media communications meetings.

Optionally, accounts may have a social media moderator in addition to the minimum two required social media account managers. Social media moderators can be student interns, graduate assistants, residents, faculty or staff, or independent contractors who assist the social media account managers in maintaining accounts, but do not oversee them.

**Checklist: Before Applying for New Social Media Account**

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 1. Ensure you’re eligible to open a social media account on behalf of COM-T</td>
<td>Guards against the dilution of the COM-T brand and duplication of efforts</td>
</tr>
<tr>
<td>☐ 2. Identify a primary account manager who meets the minimum qualifications</td>
<td>Protects the COM-T brand’s reputation, mitigates risk, helps ensure channels are effective and engaging</td>
</tr>
<tr>
<td>☐ 3. Identify a secondary account manager who can act as a back-up</td>
<td>Safeguards against underused or abandoned accounts, cross-trains staff, ensures continuity of account management when primary account manager is absent</td>
</tr>
<tr>
<td>☐ 4. Assess your ability to devote the time necessary to maintaining a social media account (e.g., content creation, building a communications strategy, engagement with followers, College-wide meetings, annual reports)</td>
<td>Guards against underused or abandoned accounts with few followers, supports a unified voice, allows progress to be monitored for continuous quality improvement purposes</td>
</tr>
</tbody>
</table>

**Getting Started: Applying for a New Account**

If you have determined you have the resources necessary to support a social media account, you need to complete an evaluation and consultation process to determine if infrastructure already exists to meet your needs. Accounts that have bypassed this process may be asked to transition their messaging to a higher-level COM-T social media account.
**Self-Evaluation Worksheet**

Before requesting to open a new social media account, gain familiarity with COM-T’s existing social media landscape to see if there’s already an account that can meet your needs. View a master list of College-affiliated social media accounts (NetID required).

**COM-T Social Media Account Self-Evaluation Worksheet**

Before initiating the process to open a new social media account for your department, center, or office, consider the following:

1. Who is our audience? Be as specific as possible.
2. What social media channel will best reach this audience?
3. What goals do we hope to accomplish with this social media account?
4. What larger institutional goals would be supported by engaging with our target audience?
5. How would we define success in meeting these goals?
6. Which social media accounts already exist within the COM-T community that share our target audiences? What are they communicating to their audiences?
7. What are some examples of social media use by other units or external organizations that we would like to emulate?
8. How do we currently engage with our target audiences (e.g., newsletters, listservs, in-person events)?
9. How many hours per week do we anticipate devoting to managing our social media account(s)?
10. Who will manage our social media account(s)? Can more than one person cover these duties? Do they have adequate time to devote to these duties? Do they have the necessary experience?
11. Will we have enough content to generate 2-3 high-quality original posts per week on Twitter/X and Facebook, or one original post per week on Instagram with high-quality images?

After you have given thought to the above questions, use the following flowchart to determine if a new social media account might be appropriate:

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<table>
<thead>
<tr>
<th>Do we have a regular employee meeting the qualifications set forth under “Attributes of a Primary Account Manager”?</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>yes</strong></td>
</tr>
<tr>
<td>Does another COM-T social media account reach our target audience? <strong>yes</strong></td>
</tr>
<tr>
<td>Can this COM-T social media account incorporate our desired messaging into their communication plan? <strong>yes</strong></td>
</tr>
<tr>
<td>Contact that account’s manager to discuss collaborating on content</td>
</tr>
<tr>
<td>Contact UAHS and COM-T for a consultation to learn about opening a new social media account</td>
</tr>
<tr>
<td>Contact UAHS and COM-T for a consultation to learn about opening a new social media account</td>
</tr>
<tr>
<td>Does an existing COM-T social media account cover our intended subject matter? <strong>yes</strong></td>
</tr>
</tbody>
</table>

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Consultation with COM-T and UArizona Health Sciences

If you have determined that you have the resources to support social media, and that COM-T or another UAH entity doesn’t have preexisting social media infrastructure to meet your needs, please fill out the Social Media Consultation Request Form, which will trigger a formal review process involving members of the UAH and COM-T brand communications teams, who may meet with you one-on-one to learn more about your vision and goals.

Your submission will be reviewed by UAH and COM-T. If the COM-T Brand Communications Team determines you have a unique need for a new social media account, and if the form contains sufficient detail, we will schedule a virtual or in-person meeting to further discuss your needs, proposed strategy, and next steps. We will also send you a supplementary COM-T Social Media Strategy Worksheet to collect information not covered by the UAH Social Media Consultation Request Form. Your department head, director, or vice dean will need to sign off on the request.

If the COM-T Brand Communications Team determines that a preexisting COM-T social media channel will serve your needs, we will reach out to you via email with our findings and can schedule a follow-up meeting if desired. If the form contains insufficient detail, we will return it with a request for specific revisions, and optionally can set up a meeting to explain in more depth the details needed.

Approval of New Social Media Account

If the COM-T Brand Communications Team determines that the proposed account will reach a unique audience and serve a need that cannot be accommodated by preexisting COM-T or UAH social media channels, you will be asked to complete a registration process with UAH. This process involves filling out a PDF form, which will be signed by the COM-T social media lead. COM-T will work with UAH to set up the account and enter login information (emails, passwords, etc.) into Stache, an encrypted system that allows COM-T or UAH to access the account in case of hacking, abandonment, employment separation, etc. When practical, COM-T may connect social media accounts to a general email address rather than a personal email address to make it easier to access accounts after an account manager has relinquished their duties.

Checklist: Applying for New Social Media Account

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ 1. Complete the COM-T Social Media Account Self-Evaluation Worksheet to determine if a new social media account is necessary to meet your unit’s needs</td>
<td>Prepares you for the formal application process, helps clarify your goals, helps assess your team’s capacity</td>
</tr>
<tr>
<td>☐ 2. Identify your target audience(s), communication goals, and strategies to meet those goals</td>
<td>Helps craft an appropriate social media strategy with measurable goals to drive evidence-based decision making</td>
</tr>
<tr>
<td>☐ 3. To UAH: Submit Social Media Consultation Request Form; it must contain sufficient level of detail</td>
<td>Triggers formal review process with UAH and COM-T communications teams to meet with you and learn more about your vision and goals</td>
</tr>
<tr>
<td>☐ 4. To COM-T Brand Communications Team: Submit supplementary Social Media Strategy Worksheet, signed by your department head</td>
<td>Collects additional information not required by UAH and shows that your strategy has been reviewed and approved by your supervisor</td>
</tr>
</tbody>
</table>
5. To COM-T Brand Communications Team: Demonstrate the need for a new social media channel and show how COM-T’s preexisting social media infrastructure does not meet your needs. Too many social media channels dilute our brand and are difficult and costly to oversee.

6. To COM-T Brand Communications Team: Submit primary account manager’s social media experience and evidence of other required attributes. Helps ensure your primary account manager has the knowledge and skills needed to run an effective account in compliance with legal guidelines, University guidelines, and social media best practices.

7. The COM-T Brand Communications Team approves of your new account(s). Ensures your social media strategy has been reviewed for viability, and account managers are able to comply with appropriate guidelines and best practices.

8. To COM-T Brand Communications Team: Submit FERPA and HIPAA training documentation for all account managers. Protects the University from legal liability and protects student and patient privacy.

Takeoff: Launching a Newly Approved Account

If it is your unit’s first social media account, its performance will be assessed by the COM-T Brand Communications Team using a one-month trial period and a six-month evaluation. Your unit will not be considered for additional channels until completing this first assessment.

One-Month Trial Period

After a social media account is approved, the primary account manager will put together four weeks’ worth of content before opening the account. This content might be posted on COM-T’s social media channels to evaluate the content and the response.

Six-Month Evaluation Meeting

Six months after launching your social media account, we will meet to evaluate your progress, review your goals, brainstorm how best to meet them, and analyze your content to see what worked and what didn’t. Remember that it can take a year or more to gain a following, and the hard work you put in at this time will influence how rapidly it grows.

Social Media Strategy Meetings

All primary account managers will be required to attend regular College-wide social media strategy meetings, and secondary account managers are encouraged to join. If the primary account manager misses more than half of these meetings in a calendar year, your group will be asked to assign a new primary account manager who can meet these expectations, or offered the option to transition your messaging to a higher-level COM-T social media account. Exceptions can be made when the primary account manager is meeting the standards set forth in this document, and can provide valid reasons for missing the meetings. In this case, the secondary account manager will be asked to attend the meeting on behalf of the primary account manager.

Annual Progress Reports

The COM-T Brand Communications team is responsible for overseeing the College’s social media performance. To do our job, we need metrics data from our account managers.
At the beginning of every calendar year, the primary account manager will be required to submit a metrics report for the previous year tracking the number of followers for each channel, impressions, top posts, comments, engagement, and engagement rate per post. The report will include a summary of your goals and evaluate whether they’ve been met, and will be supplemented by an updated COM-T Social Media Strategy Worksheet. Updating this worksheet is an opportunity to hone your strategy to better meet your goals or to improve upon the previous year’s performance. Templates of metrics reports will be available to those who would like to use them as a guide.

Finally, you will be required to keep your information up to date with UAHS. Check the UAHS Social Media Database and Stache annually to ensure contact and login information are up to date. All College-affiliated social media accounts will be subject to regular audits to ensure accounts are active and effective.

**Checklist: Opening New Social Media Account**

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. To UAHS: Submit PDF form signed by primary and secondary account managers and signed by COM-T social media lead</td>
<td>Ensures UAHS has contact information for its social media database</td>
</tr>
<tr>
<td>2. To UAHS: Submit login information to Stache, an encrypted system for storing sensitive data</td>
<td>Gives UAHS and COM-T access to the account in case of hacking, abandonment, employment separation, etc.</td>
</tr>
<tr>
<td>3. Put together four weeks of social media content before new account is opened</td>
<td>Allows evaluation of content quality, posting to a COM-T channel can gauge audience response</td>
</tr>
<tr>
<td>4. At six months, compile a metrics report and examples of successful campaigns</td>
<td>Opportunity for quality control and adjustment of strategy informed by quantifiable evidence</td>
</tr>
</tbody>
</table>

**Doing it Right: Maintaining High Standards**

Before posting, consider these questions:

1. Does this post look and sound professional?
2. How does this post contribute to our unit’s goals and support the College’s mission?
3. Will this post damage anyone’s reputation, violate patient or student privacy, or disclose confidential data?
4. Is this message relevant to all of our target audiences?

To be effective, social media account managers need to adhere to additional guidelines.

**UArizona Branding, Copyright, and Privacy Guidelines**

When we speak on behalf of COM-T, we represent COM-T and the University, and that can have legal implications. Social media account managers must understand issues around branding, copyright, FERPA, HIPAA, media release forms, and Banner’s purview over clinical matters. Public records requests received through social media should be referred to the UAHS Office of Communications and University Communications.

**University of Arizona Brand**

COM-T social media accounts cannot use the Block A logo or other salient aspects of UArizona branding without being approved by COM-T’s Brand Communications Team. Learn more about UArizona brand guidelines at [brand.arizona.edu](http://brand.arizona.edu).
Copyright and Fair Use Laws

Adhere to copyright and fair use laws. Give credit to non-University-affiliated content creators, such as photographers and artists. Stock photos and clip art must either be licensed or free to use; be sure to check usage rights and attribution requirements. Adhere to guidelines and laws when posting intellectual property or other material falling under copyright.

FERPA and HIPAA

We are required to comply with the federal Family Education Rights and Privacy Act (FERPA) with respect to student information, including sharing student likenesses in videography and photography, and certain types of faculty and staff information. At COM-T, we must further be cognizant of Health Insurance Portability and Accountability Act (HIPAA) guidelines, which state that a patient has control over their own protected health information (PHI). Names, photos, and videos of patients may not be released without consent of the patient, which is documented with a Multi-Media Consent and Release Form. Photography and filming on Banner property may not be done without approval and involvement from Banner’s communications and marketing team. Similarly, photography and filming may not take place on the property of the CUP Clinic and other clinical partners, such as the VA, without oversight from our partners to ensure patient privacy is protected at all times. Clinical partners may have separate social media policies or guidelines; for example, Banner requires that a public relations professional be present whenever photo or video is taken in clinical spaces.

To obtain permission to share human likenesses in photography, videography, or audio recordings, ask students or patients to fill out the Multi-Media Consent and Release Form, and keep the signed form on file for your records. Please see COM-T photography and videography guidelines for more information about obtaining consent from subjects to share their likeness on social media.

Honor the privacy rights of our faculty and staff by seeking their permission before writing about or displaying internal COM-T happenings that might be considered to be a breach of their privacy and confidentiality.

Clinical Care, Research, and Education

The University of Arizona College of Medicine – Tucson oversees education and research, while patient care is provided by our clinical partner, Banner University Medical Center. Matters pertaining to clinical care are under Banner’s purview and are best told by Banner’s communications and marketing team. Education and research stories containing clinical aspects may need to be reviewed by Banner’s communications and marketing team before approval for publication.

Recruitment of Study Subjects

Do not use social media to recruit human subjects to clinical trials and other studies without approval from the institutional review board of record. Unless your study is exempt or approved under flex review, all individual posts, images, other assets, and method of recruitment must have IRB approval.

Paid advertising is the most common method of recruitment through social media because it allows investigators to target their desired demographic effectively. It is common for a sponsored trial to have money put aside for recruitment, and some external IRBs offer recruitment services.

Using social media accounts to recruit participants is an option for smaller studies that lack resources for paid ads. Target your demographic to increase success, and consider leveraging larger accounts that
reach your target audience. Opening new social media accounts for recruitment purposes is not permitted at the COM-T level, as it can take too long to build a robust audience, and you will need to promptly close the account once recruitment is closed.

Do not join private social media communities, such as Facebook groups, with the intent to recruit study subjects without first gaining permission of the moderator(s). Additionally, do not use social media to recruit individuals by tagging them, messaging them publicly or privately, or following them for the purpose of alerting them to the research. Remember that identifying patients publicly on social media constitutes a HIPAA violation without written consent.

Creating your own social media account to act as a forum for participants is not permitted, as such a forum creates liabilities around patient confidentiality, could affect the integrity of your data if participants interact, and requires prompt comment moderation.

We recommend against publicizing compensation for participants on social media, which may inhibit your ability to collect meaningful data from people who are truly interested in the study and expose you to scammers submitting bad data.

Learn more about using social media in recruitment from Research Innovation & Impact and UAHS.

Prepare Content Within a Strategic Framework

Social media account managers are expected to collaborate across COM-T to coordinate College-wide messaging for a greater impact. For example, for Breast Cancer Awareness Month, one social media account manager might take the lead on creating content, with other account managers sharing this content on their channels when relevant. Opportunities for collaboration and coordination will occur during regular social media strategy meetings, and may occur via email as well.

Choose appropriate language for your audience (for example, don’t use jargon and technical language when your target audience is the general public). Choose appropriate messages for your audience (for example, don’t seek large donors when your target audience is students).

Tag related University, College, and Banner UMC social media accounts when relevant to encourage amplification of your messaging. Monitor your own feeds and consider sharing social media content in which your unit is tagged.

Maintain High Quality

To protect our reputation, account managers are expected to ensure that graphics are well-designed, aesthetically pleasing, and compliant with University branding guidelines; that photos are high-resolution and well composed; and that text is free of typos, misspellings, and other errors. Familiarize yourself with resources such as the Associated Press Stylebook, the University of Arizona Style Guide, and the Health Sciences Style Guide.

Information should be factual and health claims should include citations. You are encouraged to link to source material whenever possible. This will help reduce the spread of misinformation, and can drive traffic to the COM-T website.

Keep Content Current

Social media account managers are expected to create original content regularly. A good rule of thumb is to shoot for 2-3 high-quality original posts per week on Facebook and Twitter/X, and one high-quality original post per week on Instagram (with exceptions made for University Closure). Social media account managers will monitor other COM-T channels to amplify (retweet, share, like, comment on) their messaging when relevant.
Abandoned accounts diminish the brand and may be flagged during routine social media audits. An account is considered abandoned if it has not been updated in 12 weeks. The COM-T Brand Communications Team will reach out to the social media managers connected to these accounts to help them meet their communication goals, which could include finding effective alternatives to maintaining the account.

Accounts that don’t show a steady increase in followers may be flagged during routine social media audits, as they can have a negative impact on the COM-T brand. After an account has been active for at least a year, a minimum 3% annual increase in followers is expected. If an account is not showing an adequate growth in followers, the COM-T Brand Communications Team may reach out to the social media managers to explore alternative strategies for meeting communication goals.

Maintain Professionalism

Information shared must be accurate, thoughtful, respectful, and appropriate for your target audience. If you are not sure the information you’re sharing is accurate, don’t post it. Don’t answer questions on behalf of another department, center, office, or unit.

The University of Arizona is a public institution. As such, a College-affiliated social media account, unlike a personal social media account, does not contain opinions. Opinions and comments expressed by individuals are the authors’ own and do not necessarily reflect COM-T’s views. Any social media account branded with the COM-T or UArizona logo acting on behalf of a COM-T department, center, or office must be “viewpoint neutral,” sharing factual and unbiased content promoting College-sanctioned events; raising awareness of health issues; spotlighting our students, faculty, and staff; and sharing other content in alignment with the broader COM-T communications strategy.

Avoid conflicts of interest, such as using the social media account to promote information that would personally benefit the account manager, such as promoting businesses, publications, etc.

Monitor Conversations

Social media accounts are potentially public forums for free speech. Social media account managers must be diplomatic when interacting with other users on the forum. Because UArizona is a public university, we cannot block users or delete their comments based on their viewpoints, and must remain viewpoint neutral when monitoring forums. If the platform allows it, nuisance comments can be “muted” so that other users cannot see it. Please refer to the Policy to learn what types of content can be deleted, and see University guidelines for responding to negative feedback.

Checklist: Maintaining Social Media Account

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Purpose</th>
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<tbody>
<tr>
<td>☐ 1. To UAHS: Update social media database and Stache at the beginning of every calendar year and every time there is a change in account manager or login information</td>
<td>Ensures UAHS has up-to-date contact information for its social media database and that UAHS retains access to the account in case of hacking, abandonment, employment separation, etc.</td>
</tr>
<tr>
<td>☐ 2. To COM-T Brand Communications Team: Submit updated Social Media Strategy Worksheet at the beginning of every calendar year</td>
<td>Evaluates the effectiveness of your strategy and keeps it responsive to trends</td>
</tr>
<tr>
<td>□ 3.</td>
<td>To COM-T Brand Communications Team: Submit metrics report for the previous year at the beginning of every calendar year</td>
</tr>
<tr>
<td>□ 4.</td>
<td>Attend regular COM-T social media strategy meetings</td>
</tr>
<tr>
<td>□ 5.</td>
<td>Maintain high standards around branding, legal matters, strategy, aesthetics, language use, professionalism</td>
</tr>
</tbody>
</table>

Any official COM-T social media account in violation of the social media Policy or Guidelines may be transitioned to a higher-level College-affiliated social media channel.