

## Social Media Policy

This document outlines my private practice's policies as a mental health counselor related to uses of Social Media. You are invited to read it to understand how I conduct myself on the Internet as a mental health professional and how you can expect me to respond to various interactions that may occur between us on the Internet. References to specific Codes of Ethics appear in the "Conclusion" section below.

If you have any questions about anything within this document, I encourage you to bring them up when we meet. As new technology develops and the Internet changes, there may be times when I need to update this policy. If I do so, I will notify you in writing of any policy changes and make sure you have a copy of the updated policy, placing an updated copy on my website at [choicesmhc.com/?q=policies](http://choicesmhc.com/?q=policies).

### *Friending*

I do not accept friend or contact requests from current or former clients on any social networking site (Facebook, LinkedIn, etc.) I believe that adding clients as friends or contacts on these sites can compromise your confidentiality and our respective privacy. It may also blur the boundaries of our therapeutic relationship. If you have questions about this, please bring them up when we meet and we can talk more about it.

### *Fanning*

Choices Mental Health Counseling keeps a Facebook Page to allow people to share my blog posts and practice updates with other Facebook users. All information shared on this page is visible on the web.

You are welcome to view my public Facebook Page at [facebook.com/choicesmhc](https://facebook.com/choicesmhc) and read or share articles posted there, but I do not accept clients as Fans of this Page. I believe having clients as Facebook Fans creates a greater likelihood of compromised client confidentiality and I feel it is best to be explicit to all who may view my list of Fans to know that they will not find client names on that list. In addition, the American Counseling Association's Ethics Code prohibits my soliciting testimonials from clients. I believe the term "Fan" comes too close to an implied request for a public endorsement of my practice.

If you wish, you may be able to subscribe to the page via RSS without becoming a Fan and without creating a visible, public link to my Page. You are more than welcome to do this.

### *Following*

I publish a blog on my website and I publicly post mental health and recovery related news on the Facebook Page of Choices Mental Health Counseling PLLC at [facebook.com/choicesmhc](https://facebook.com/choicesmhc). I have no expectation that you as a client will want to "Like" or follow my blog or Facebook stream. However, if you use an easily recognizable name on Twitter and I happen to notice that you've followed me there, we may briefly discuss it and its potential impact on our working relationship. You are always welcome to bring up anything that you may have read by me that is posted online that you may have questions about during any of our individual sessions.

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My primary concern is your privacy. If you share this concern, there are more private ways to follow me on Twitter (such as using an RSS feed), which would eliminate your having a public link to my content. You are welcome to use your own discretion in choosing whether to follow me.

Note that I will not follow you back. I only follow other health professionals on Facebook and I do not follow current or former clients on blogs or Twitter. My reasoning is that I believe casual viewing of clients' online content outside of the therapy hour can create confusion in regard to whether it's being done as a part of your treatment or to satisfy my personal curiosity. In addition, viewing your online activities without your consent and without our explicit arrangement towards a specific purpose could potentially have a negative influence on our working relationship. If there are things from your online life that you wish to share with me, please bring them into our sessions where we can view and explore them together, during the therapy hour.

## *Interacting*

Please do not use messaging on Social Networking sites such as Twitter, Facebook, or LinkedIn to contact me. These sites are not secure and I may not read these messages in a timely fashion. Do not use Wall postings, @replies, or other means of engaging with me in public online if we have an already established client/therapist relationship. Engaging with me this way could compromise your confidentiality. Such exchanges could become a part of your legal medical record and will need to be documented and archived in your chart. If you post or respond to a post in a public Facebook group to which we might both happen to belong, I might interact with you as I might with any other member of the public in a public space in our rural community without acknowledging that I know you.

Please do not use SMS (mobile phone text messaging) except for routine matters such as to confirm appointments. If you need to contact me between sessions, the best way to do so is by phone at 845-513-5002. Direct email at tom [at] choicemhc [dot com] is second best for quick, administrative issues such as changing appointment times. See the email section below for more information regarding email interactions.

## *Use of Search Engines*

It is NOT a regular part of my practice to search for clients on Google or Facebook or other search engines. Extremely rare exceptions may be made in times of crisis. If I have a reason to suspect you are in danger and you have not been in touch with me via our usual means (coming to appointments, phone, or email) there might be an instance in which using a search engine (to find you, find someone close to you, or to check on your recent status updates) becomes necessary as part of ensuring your welfare. These are unusual situations and if I ever resort to such means, I would document it and discuss it with you when we next meet.

## *Google Reader*

I do not follow current or former clients on Google Reader and I do not use Google Reader to share articles. If there are things you want to share with me that you feel are relevant to your treatment whether they are news items or things you have created, I encourage you to bring these items of interest into our sessions.

## *Business Review Sites*

You may find my counseling practice on sites such as Yelp, Healthgrades, Yahoo Local, Bing, or other places which list businesses. Some of these sites include forums in which users rate their providers and add reviews. Many of these sites comb search engines for business listings and automatically add listings regardless of

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whether the business has added itself to the site. If you should find my listing on any of these sites, please know that my listing is NOT a request for a testimonial, rating, or endorsement from you as my client.

The American Counseling Association's Ethics Code states under Section C.3.b. that it is unethical for counselors to solicit testimonials: "Counselors who use testimonials do not solicit them from current clients, former clients, or any other persons who may be vulnerable to undue influence. Counselors discuss with clients the implications of and obtain permission for the use of any testimonial."

Of course, you have a right to express yourself on any site you wish. But due to confidentiality, I cannot respond to any review on any of these sites whether it is positive or negative. I urge you to take your own privacy as seriously as I take my commitment of confidentiality to you. You should also be aware that if you are using these sites to communicate indirectly with me about your feelings about our work, there is a good possibility that I may never see it.

If we are working together, I hope that you will bring your feelings and reactions to our work directly into the therapy process. This can be an important part of therapy, even if you decide we are not a good fit. None of this is meant to keep you from sharing that you are in therapy with me wherever and with whomever you like. Confidentiality means that I cannot tell people that you are my client and my Ethics Code prohibits me from requesting testimonials. But you are more than welcome to tell anyone you wish that I'm your therapist or how you feel about the treatment I provided to you, in any forum of your choosing.

If you do choose to write something on a business review site, I hope you will keep in mind that you may be sharing personally revealing information in a public forum. I urge you to create a pseudonym that is not linked to your regular email address or friend networks for your own privacy and protection.

If you feel I have done something harmful or unethical and you don't feel comfortable discussing it with me, you can always contact the board which oversees licensing, and they will review the services I have provided.

Office of Professional Discipline  
Mid-Hudson Region  
One Gateway Plaza, 3rd floor  
Port Chester, NY 10573  
Tel: 914-934-7550  
Fax: 914-934-7607

## *Location-Based Services*

If you used location-based services on your phone, you may wish to be aware of the privacy issues related to using these services. I do not place my practice as a check-in location on various sites such as Foursquare, Gowalla, Loopt, etc. However, if you have GPS tracking enabled on your device, it's possible that others may surmise that you are a therapy client due to regular check-ins at my office. Please be aware of this risk if you intentionally "check in" from my office or if you have a passive LBS app enabled on your phone.

## *Email*

I prefer using email only to arrange or modify appointments, for billing, or other routine matters. Please do not email me content related to your therapy sessions, as email is not completely secure or confidential. If you

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choose to communicate with me by email, be aware that all emails are retained in the logs of your and my Internet service providers. While it is unlikely that someone will be looking at these logs, they are, in theory, available to be read by the system administrator(s) of the Internet service provider. You should also know that any emails I receive from you and any responses that I send to you become a part of your legal record.

### *Conclusion*

I believe the foregoing policy fully complies and is consistent with the following section of the Code of Ethics of the American Counseling Association, of which I am a professional member:

#### *H.6. Social Media*

##### *H.6.a. Virtual Professional Presence*

In cases where counselors wish to maintain a professional and personal presence for social media use, separate professional and personal web pages and profiles are created to clearly distinguish between the two kinds of virtual presence.

##### *H.6.b. Social Media as Part of Informed Consent*

Counselors clearly explain to their clients, as part of the informed consent procedure, the benefits, limitations, and boundaries of the use of social media.

##### *H.6.c. Client Virtual Presence*

Counselors respect the privacy of their clients' presence on social media unless given consent to view such information.

##### *H.6.d. Use of Public Social Media*

Counselors take precautions to avoid disclosing confidential information through public social media.

Likewise, I believe this fully complies and is consistent with the National Board for Certified Counselors' Code of Ethics (where I am a National Certified Counselor [NCC] and Certified Clinical Mental Health Counselor [CCMHC]) which contains the following directives on use of social media by professional counselors:

*19. NCCs shall recognize the potential harm of informal uses of social media and other related technology with clients, former clients and their families and personal friends. After carefully considering all of the ethical implications, including confidentiality, privacy and multiple relationships, NCCs shall develop written practice procedures in regard to social media and digital technology, and these shall be incorporated with the information provided to clients before or during the initial session. At a minimum, these social media procedures shall specify that personal accounts will be separate and isolated from any used for professional counseling purposes including those used with prospective or current clients. These procedures shall also address "friending" and responding to material posted.*

*20. NCCs shall not use social media sources (e.g., updates, tweets, blogs, etc.) to provide confidential information regarding client cases that have not been consented to by the client. To facilitate the secure provision of information, NCCs shall inform clients prior to or during the initial session about appropriate ways to communicate with them. Furthermore, NCCs shall advise clients about the potential risks of sending messages through digital technology and social media sources.*

*21. NCCs who use digital technology (e.g., social media) for professional purposes shall limit information posted to that which does not create multiple relationships or which may threaten client confidentiality.*

Thank you for taking the time to review my Social Media Policy. If you have questions or concerns about any of these policies and procedures or regarding our potential interactions on the Internet, please bring them to my attention so that we can discuss them.

Policy revised and adopted by Choices Mental Health Counseling PLLC on February 4, 2018.

*This statement is a modification of a "Social Media Policy" by Keely Kolmes, PsyD, © 4/26/10 (<http://drkkolmes.com/social-media-policy/>) and is licensed by that author under the Creative Commons Attribution-Noncommercial-Share Alike 3.0 United States License.*