

## Policy and Standards

<b>Policy Number:</b>	<b>LE.906.08-2021</b>
<b>Policy Name:</b>	<b>Social Media</b>
<b>Review Type:</b>	Non-substantive
<b>Contract or Regulatory Reference:</b> (include citation if applicable)	N/A

### Corporate Policy Approvals

12 – 2021 had no changes or the changes were non-substantive; thus, full corporate approvals were not required.

Lilly Ackley	<i>Approval on file</i>	December 07, 2021
Magellan Health, Vice President, Communications		Date

**Product Applicability:** *(For Health Insurance Marketplaces, policies and procedures are the same, unless contractual requirements dictate a more stringent variation in which case customized documents are created.)*

#### Commercial

#### Medicaid

#### Medicare Part: C (Medicare Advantage)

#### Medicare Part: D

#### Federal (Applies to Magellan Federal, Magellan Healthcare, non-Medicaid or Medicare, Federal contracts)

### Business Division and Entity Applicability:

#### Magellan Healthcare

Magellan Federal  
Federal Occupational Health  
Magellan Healthcare (Behavioral)  
National Imaging Associates

#### Magellan Rx Management

4D Pharmacy Management Systems  
Magellan Medicaid Administration  
Magellan Method (formerly CDMI)  
Magellan Pharmacy Solutions  
Magellan Rx Management  
Magellan Rx Medicare  
Magellan Rx Pharmacy  
VRx Pharmacy  
VRx

## Policy Statement

Our ability to tell Magellan’s story in a clear and cohesive manner is critically important. This requires the coordination of all communications to ensure that we are portraying ourselves simply as one company with one brand and one vision. As a public company, Magellan Health is governed by the Securities and Exchange Commission (SEC), including Regulation Fair Disclosure (Reg FD). Regulation FD mandates that disclosure of material information to investors is made at the same time (not selectively). Information is material if there is a substantial likelihood that a reasonable investor would consider it important in deciding whether to buy, hold, or sell Magellan’s securities. Please remember, that under Regulation FD, we are responsible for unintentional disclosures or disclosures made by mistake. Additionally, the Federal Trade Commission has guidelines that state that before using social media to talk about an employer’s products or services, an employee must clearly and conspicuously disclose the employee/employer relationship within the social media post. Along with the benefits of communicating on social media channels, there is inherent risk of unpredictable interactions as the public can now engage directly with our brand 24 hours a day, seven days a week. It is the responsibility of anyone managing a social media channel (representing or speaking on behalf of Magellan Health or its subsidiaries) to follow the below procedures to protect our brand and mitigate risk in adverse situations.

Participation on social media channels may include, but is not limited to, postings on online forums, blogs, wikis, Facebook, Facebook at Work, Google +, LinkedIn, Snapchat, YouTube, Twitter, media sites, or similar types of online forums.

## Purpose

To ensure that communications related to Magellan in social media are consistent with Magellan’s [Code of Conduct \(accessible through a tile in OKTA\)](#), [Employee Handbook \(https://magellan.service-now.com/vern\)](https://magellan.service-now.com/vern), policies and procedures, and applicable laws, including laws concerning privacy, confidentiality, copyright and trademarks. Additionally, we must ensure that Magellan-sponsored social media are used and managed in a manner consistent with this policy and communications must be accurate.

## Policy Terms & Definitions Glossary

### Key Terms (as used in this policy)

#### *Blog*

Short for “Web log”, a site that allows an individual or group of individuals to share a running log of events and personal insights with online audiences.

#### *Magellan Information*

Information in any form, including media, that pertains to or is created by or on behalf of Magellan in the course and scope of its business and is not available to the general public, regardless of whether that information is maintained or stored by Magellan and others on Magellan’s behalf. Examples of Magellan Information include, but are not limited to:

- Patient and member records, personnel records, financial information, company competitive information, customer names, confidential personal information pertaining to employees, Magellan-developed intellectual property, and business e-mail messages.

Magellan Information does not include information concerning labor disputes or terms and conditions of employment that are protected under the National Labor Relations Act or other applicable labor laws (referred to herein as “protected employment information”) that is disclosed in compliance with Standard III.F. of this policy.

## SOCIAL MEDIA

### *Protected Health Information (PHI) or Personally Identifiable Information (PII)*

Any individually identifiable information (oral, written or electronic) regarding a member/patient of Magellan collected, received, created, transmitted or maintained in connection with his/her status as a member or patient. PHI/PII includes, but is not limited to, information about a member/patient's physical or mental health, the receipt of healthcare, or payment for that care; member/patient records, enrollment and disenrollment information; patient's name, address, Social Security Number, account number, security code, information from or about transactions, driver's license number, financial or credit account numbers, phone numbers, or other personal identifiers.

### *Podcast*

A collection of digital media files distributed over the internet, often using syndication feeds for playback on portable media players and personal computers.

### *RSS feeds or Syndication Feeds*

A family of different formats used to publish updated content such as blog entries, news headlines or podcasts that "feed" this information to subscribers via e-mail or by an RSS reader.

### *Social Media*

Includes, but are not limited to, blogs, podcasts, discussion forums, chat rooms, on-line collaborative information and publishing systems that are accessible to internal and external audiences (i.e. Wikis), RSS feeds, syndication feeds, video and photo sharing, sharing, and social networks such as Facebook, Facebook at Work, Workplace, Google +, Snapchat, Twitter, YouTube, Instagram and LinkedIn.

### *Wiki*

Allows users to create, edit and link web pages easily. Often used to create collaborative websites (called "Wikis") and to power community websites.

Additional *Policy Terms & Definitions* are available should the reader need to inquire as to the definition of a term used in this policy.

To access the *Policy Terms & Definitions Glossary* in C360, click on the below link: *(internal link(s) available to Magellan Health employees only)*

[Policy Terms & Definitions Glossary](#)

## Standards

- I. Magellan respects the rights of employees to appropriately express their views and opinions, including through the use of social media.
- II. **Participating** in Magellan-Sponsored Social Media or Other Social Media Channels
  - A. In order to protect employees and Magellan, when **participating** in Magellan-sponsored social media or in other social media where the communication is or could be Magellan related, you should abide by the following guidelines:
    1. **Be responsible.** Communications made in social media should be consistent with Magellan's [Code of Conduct \(accessible through a tile in OKTA\)](#), [Employee Handbook \(https://magellan.service-now.com/vern\)](#), policies, and applicable laws. Employees are personally responsible for their own communications and can be disciplined or held liable if any party (including, but not limited to, Magellan) deems an employee's communication to be illegal, in violation of this policy, libelous, harassing, threatening, defamatory, or disclosing Magellan Information;

2. **Maintain confidentiality.** Communications in social media should never contain information that discloses a member's Protected Health Information (PHI) or Personally Identifiable Information (PII) in any way, including photographs or video. Even if an individual is not identified by name within the information you wish to use or disclose, if there is a reasonable basis to believe that the person could still be identified from that information, then its use or disclosure could constitute a violation of law and/or regulations including without limitation the Health Insurance Portability and Accountability Act (HIPAA), and Magellan's privacy policies. If you have any question whether information is PHI or is sufficiently de-identified, please contact the HIPAA Privacy Officer before posting the information;
3. **Protect yourself and our business.** Communications made through social media must not contain any Magellan Information or other information that is confidential, proprietary or a trade-secret. Do not disclose or discuss confidential company and customer information, business and legal matters, or developments unless this information has been previously disclosed to the public or is protected employment information. In addition, unless protected employment information, do not comment on legal matters or ongoing crises or post any information which would result (or have the potential to result) in a detriment to Magellan's business, including, but not limited to, the Magellan's reputation and goodwill. If you are unsure if information is publicly available or is otherwise inappropriate to post, contact Corporate Communications or the Investor Relations department before posting any such information. To reach Corporate Communications, please contact Lilly Ackley (ackleyl@magellanhealth.com). To reach Investor Relations, please contact Matt Peary (mpeary@magellanhealth.com);
4. **Respect copyrights.** Individuals should not infringe Magellan's (or others') rights in copyrighted materials (written, audio, video and all other electronic forms) in their social media communications and should not use copyrighted material in a way that would violate such rights without proper permission. You may not use Magellan and/or product logos for any business/commercial venture or in any manner that implies that you may be speaking on behalf of Magellan. In addition, you may not use Magellan's name for personal financial benefit and your online activity should not present a conflict of interest under Magellan's [Code of Conduct \(accessible through a tile in OKTA\)](#) or [Employee Handbook \(https://magellan.service-now.com/vern\)](https://magellan.service-now.com/vern). Do not use photographs or video of Magellan's confidential information, processes, operations, or services without Magellan's prior written approval;
5. **Be respectful of others.** Individuals should refrain, at all times, from using language that is obscene, defamatory, derogatory, profane, libelous, threatening, harassing, discriminatory, abusive, hateful, discriminatory or humiliating to another person or entity, including employees, customers and members, as well as other members of Magellan's industry including its competitors. Respect the privacy of Magellan employees and contractors by obtaining permission before discussing or sharing private information about or images of colleagues or disclosing colleagues' personal contact information. Remember, you are "speaking" publicly, and your contribution may stay searchable and retrievable for a long time to a broad audience - both internally and externally. In addition, Managers should not send "friend" requests to subordinates unless there is a valid business purpose for doing so. Any employee may reject a friend request from any other employee without fear of retaliation;
6. **Be honest and accurate.** When an employee, temporary staff member, contractor, volunteer, or other associate of Magellan communicates in social media about Magellan, provide full disclosure acknowledging the relationship with Magellan and

include a disclaimer advising that you are not speaking officially on behalf of the organization. Additionally, before using social media to talk about Magellan's products or services, you must clearly and conspicuously disclose your relationship to Magellan within the social media post. For example, add a disclaimer to read: *"The opinions and positions expressed are my own and don't necessarily reflect those of Magellan Health, Inc."* Never misrepresent yourself or information about Magellan. Never knowingly speak on behalf of Magellan or hold yourself out as speaking out on behalf of Magellan unless you have been authorized by the company to do so. Also, communicate accurately and correct errors or omissions in a timely fashion (rather than deleting them); and

7. **Know who to call.** Contact Lilly Ackley ([ackleyl@magellanhealth.com](mailto:ackleyl@magellanhealth.com)) if you are approached by the media concerning anything that you or another Magellan employee may have posted/said in social media concerning Magellan.
- B. If you notice a posting that you believe violates this policy on any of Magellan's social media channels, immediately contact the Social Media Team ([socialmedia@magellanhealth.com](mailto:socialmedia@magellanhealth.com)). If possible, please include a screen shot of the comment.

### III. **Managing** a Magellan-Sponsored Social Media Channel

- A. Along with the benefits of communicating in social media channels, there is inherent risk of unpredictable interactions as the public can now engage directly with our brand 24 hours a day, seven days a week. It is the responsibility of anyone **managing** a corporate social media channel (representing or speaking on behalf of Magellan Health or its subsidiaries) to follow the below procedures to protect our brand and mitigate risk in adverse situations.
  1. **Every Magellan-sponsored social media site is required to have a designated manager**, who will be responsible for monitoring activity, responding to messages, flagging inappropriate activity, and removing offensive comments or comments revealing Magellan Information and/or another person's PHI. If for some reason the manager is not available to monitor the site, he/she must delegate this responsibility to another capable party within Magellan.
    - The manager is responsible for completing an *Access Request Form* within [RITA \(Accessible through a tile in OKTA\)](#) to document his/her status as manager, the objectives of the social media site, associated business unit/dept, and acknowledgement of commitment to abide by this policy document. This form will be submitted to Marketing/Communications for approval to proceed with the social media site.
  2. **Login and password information for social media sites** must be provided to Lilly Ackley ([ackleyl@magellanhealth.com](mailto:ackleyl@magellanhealth.com)) for record keeping and ability to intervene if needed.
  3. **The social media site manager or a delegate must review the latest activity within his/her channel at least two times per day, including weekends and holidays** (preferably mid-morning and mid-afternoon) as social media activity can happen at any time. The social media manager shall set up real-time notifications for the channel to his/her computer and/or mobile device, via e-mail or app, to the extent that this capability exists for that social channel. **Comments or direct messages to Magellan of general or low urgency should be responded to within 24 hours wherever possible.**

4. **Comments or direct messages of an urgent or sensitive nature should be regarded with immediate attention.** The social media manager is required to alert Lilly Ackley ([ackleyl@magellanhealth.com](mailto:ackleyl@magellanhealth.com)) for any activity that could be considered a media crisis communication situation. If the message is from a member or individual seeking care or clinical support, the social media manager should ask the individual to email [SocialMedia@magellanhealth.com](mailto:SocialMedia@magellanhealth.com) with further details about his/her situation in order to better explore and resolve his/her concerns. The social media post and/or any follow-up emails from the individual should be shared with the Social Crisis Response Team for further guidance in handling if the issue cannot be resolved immediately.
5. **If a threat to self-harm or harm to others is stated, the social media manager is required to respond to the poster immediately, advising him/her to call 911 as appropriate. They must also alert the Social Crisis Response Team immediately** and provide as much information as possible about the poster to identify details of his/her situation for further ability to follow up.
  - a) If the situation occurs on Twitter, please submit the following form for additional handling: <https://support.twitter.com/forms/suicide>.
  - b) If the situation occurs on LinkedIn, please contact their Safety Center: <https://help.linkedin.com/app/safety/home>.
  - c) If the situation occurs on Facebook, please report via the report link that will be on the comment itself (for additional help on how to report within Facebook, see: <https://www.facebook.com/help/181495968648557>).

**B. Social Crisis Response Team Contacts:**

1. Magellan Health: Lilly Ackley, Alex Rose or Jacqueline Stoughton;
2. Magellan Healthcare: Marnie Keogh or Estelle Cappellieri; and
3. Magellan Rx: Kayla Hirsch or Nicole Gumula.

- C. Public comments or posts containing PHI or PII.** While not encouraged, an individual may post his/her own PHI/PII at his/her own discretion. However, if an individual reveals another person's PHI/PII in a post on a Magellan-sponsored social media site, the social media manager should hide or delete the post if possible, depending on the restrictions of the social media site. If a post cannot be removed from public view, the social media manager should contact the social media site directly to report for further handling. Always ask the poster to email [SocialMedia@magellanhealth.com](mailto:SocialMedia@magellanhealth.com) with further details of his/her situation in order to better explore and resolve his/her concerns.

- IV. Magellan provides employees with Email and internet access to support Magellan business purposes only. Although users who are given access to these tools may make incidental personal use of them, they may not make extensive personal use of them either during work or non-work time. Each user's manager has the right and responsibility to determine what "extensive use" is and should refer to the Human Resources [\*Employee Handbook\*](#) (<https://magellan.service-now.com/vern>) *Communications and System Security section* (page 33) for further information and guidance.

- Individuals who have concerns regarding workplace conduct or inappropriate behavior are encouraged to contact their immediate supervisor, Employee Relations by [completing](#) the Conflict Resolution Form in VERN or the Compliance Hotline @1-800-915-2108 or by sending an email to [Compliance@MagellanHealth.com](mailto:Compliance@MagellanHealth.com). This policy will not be construed or applied in a manner that improperly interferes with employees' rights under the National Labor Relations Act.

**SOCIAL MEDIA**

**Cross Reference(s)**

*None*

**Corporate Policy Life History**

<b>Date of Inception:</b> March 30, 2011	<b>Previous Review Date:</b> November 17, 2020	<b>Current Review Date:</b> December 07, 2021
<b>Previous Corporate Approval Date:</b> November 24, 2020	<b>Current Corporate Approval Date:</b> December 07, 2021	<b>Unit Effective Date:</b> January 07, 2022

**Associated Corporate Forms & Attachments** *(internal link(s) available to Magellan Health employees only)*

*None*

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