

Associated Counseling Professionals

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Our Social Media & Email Policy

This document outlines our office policies related to the use of Social Media & Email. Please read it to understand how we conduct ourselves on the Internet as mental health professionals and how you can expect us to respond to various interactions that may occur between us on the Internet.

If you have any questions about anything within this document, we encourage you to bring them up when we meet. As new technology develops and the Internet changes, there may be times when we need to update this policy. If we do so, we will notify you in writing of any policy changes and make sure you have a copy of the updated policy.

Friending - Connections

We do not accept friend or connection requests from current or former clients on any social networking site (Facebook, LinkedIn, Pinterest, etc). We 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.

Likes on Facebook

ACP maintains a Facebook Page [Address: www.facebook.com/ACP.Counseling.Omaha] to allow people to share our blog posts and practice updates with other Facebook users. All of the information shared on this page is relevant to mental health, wellness and personal growth. Some of our staff may post updates or news items to a practice-related Facebook page, as well.

You are welcome to view our Facebook Page[s] and read or share articles posted there, but we do not encourage you to like our page. We believe having clients Liking our pages creates a greater likelihood of compromised client confidentiality and we feel it is best to be explicit to all who may view our 'People' list that they will not find client names on that list. In addition, ethical codes prohibit our soliciting testimonials from clients. We feel that connecting with ACP through a LIKE comes too close to an implied request for a public endorsement of our practice.

Following

We publish a blog on our website. Individual staff members may do the same, and might post health & psychology news on Twitter, Google+, LinkedIn, etc. We have no expectation that you as a client will want to follow our blogs or Twitter streams. However, if you use an easily recognizable name on Twitter and we happen to notice that you've followed one of us there, we may briefly discuss it and its potential impact on our working relationship. Our primary concern is your privacy. If you share this concern, there are more private ways to follow someone on Twitter (such as using an RSS feed or a locked Twitter list), which would eliminate your having a public link to our content. You are welcome to use your own discretion in choosing whether to follow ACP or one of our staff members.

Note that we will not follow you back. Those of us who use Twitter typically follow other health professionals and we do not follow current or former clients on blogs or Twitter. My reasoning is that we 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 our 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 your therapist, please bring them into your sessions where you and your therapist can view and explore them together, during the therapy hour.

Interacting

Please do not use SMS (mobile phone text messaging) or messaging on Social Networking sites such as Twitter, Facebook, or LinkedIn to contact us. These sites are not secure and your therapist may not read these messages in a timely fashion. Do not use Wall postings, [@replies](#), or other means of engaging with your therapist in public/online if we have an already established client/therapist relationship. Engaging with us this way could compromise your confidentiality. It may also create the possibility that these exchanges become a part of your legal medical record and will need to be documented and archived in your chart.

If you need to contact me between sessions, the best way to do so is by phone. See the email section below for more information regarding email interactions.

Also, remember that using the **Contact Us form** on acpcounseling.com or your therapist's personal site will not guarantee swift response – as these messages are not always monitored continuously. The form automatically submits your message to a mailbox secured by Google Apps. We have signed a Business Associate Agreement [BAA] with Google. Your message is stored on HIPAA compliant servers. Here's what Google says:

Ensuring that our customers' data is safe, secure and always available to them is one of our top priorities. To demonstrate our compliance with security standards in the industry, Google has sought and received security certifications such as [ISO 27001 certification](#) and [SOC 2 and SOC 3 Type II audits](#). For customers who are [subject to the requirements](#) of the Health Insurance Portability and Accountability Act (HIPAA), Google Apps can also support HIPAA compliance. Under HIPAA, certain information about a person's health or health care services is classified as Protected Health Information (PHI). Google Apps customers who are subject to HIPAA and wish to use Google Apps with PHI must sign a Business Associate Agreement (BAA) with Google.

Responses from the **Contact Us Form** will use encryption from , [Virtru](#) uses 256-bit AES with Perfect Forward Secrecy (PFS) for end-to-end encryption. So, only that very first message from the Contact Us Form will lack total security. We also have a BAA relationship with Virtru.

Use of search engines

It is NOT a regular part of our practice to search for clients on Google/Bing/Yahoo or Facebook or other social media sites. Extremely rare exceptions *may* be made during times of crisis. If I have a reason to

suspect that 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 we ever resort to such means, we will fully document it and discuss it with you when we next meet.

RSS Feeds We do not follow current or former clients using RSS feeds. 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, We encourage you to bring these items of interest into our sessions.

Business review sites

You may find our psychology practice on sites such as Yelp, Angie's List, Healthgrades, Yahoo Local, Bing, Google+ 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 whether the business has added itself to the site. If you should find our listing on any of these sites, please know that our listing is **NOT** a request for a testimonial, rating, or endorsement from you as our client.

The American Psychological Association's Ethics Code states under Principle 5.05 that it is unethical for psychologists to solicit testimonials: "Psychologists do not solicit testimonials from current therapy clients/patients or other persons who because of their particular circumstances are vulnerable to undue influence." The National Association of Social Workers [section 4.07] has similar language, as well.

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

If we are working together, we hope that you will bring your feelings and reactions to your sessions 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 one of our staff members wherever and with whomever you like. Confidentiality means that we cannot tell people that you are our client and our Ethics Codes prohibits us from requesting testimonials. But you are more than welcome to tell anyone you wish about your therapist or how you feel about the treatment s/he provided to you, in any forum of your choosing.

Location-Based Services [LBS]

If you used location-based services on your mobile phone, you may wish to be aware of the privacy issues related to using these services. We do not place our 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 is possible that others may surmise that you are a therapy client due to regular check-ins at our office on a weekly basis. Please be aware of this risk if you are intentionally "checking in," from our office or if you have a passive LBS app enabled on your phone.

Email

We prefer using email only to respond to basic questions about our services [especially before your first appointment]. Please do not email content related to your therapy sessions, as email is not completely secure or confidential. If you choose to communicate with your therapist by email, be aware that all emails are retained in the logs of your and our 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 treatment record.

It varies by clinician, but some of our staff will [with your expressed & informed consent], use email capabilities. Email can be used to send links to online resources, sites, books, multimedia presentations, therapeutic tools, questionnaires, etc., as examples. If you and your therapist talk it over, and agree that email is a valid tool for correspondence during your work together – then a consent can be signed and placed in your client file. You can rescind that consent later, if you change your mind.

The use of E-MAIL: It is very important to be aware that computers and standard email communication can be relatively easily accessed by unauthorized people and hence can compromise the privacy and confidentiality of such communication. That's why we've partnered with Google Apps for Work and Virtru. Email that contains protected/personal health information must receive special care – messages should go through secure servers and the messages themselves should be encrypted. The combination of Google Apps and Virtru encryption give us that level of HIPAA compliant communication.

It is important that you be aware that emails are part of the medical record. Everyone's computers are equipped with a firewall, a virus protection, and a password and s/he also backs up all confidential information from his/her computers on a regular basis. Please notify your therapist if you decide to avoid or limit in any way the use of any or all communication devices. If you communicate confidential or private information via email we will assume that you have made an informed decision, will view it as your agreement to take the risk that such communication may be intercepted, and will honor your desire to communicate on such matters via email. Please do not use email, texts, phone messages, or faxes for emergencies.

Any mail coming from and/or sent to an email address ending in **@acpcounseling.com** will be part of our Google Apps core services – and the messages will be held [on our end of the conversation] on Google's secure servers. Google's level of security for this service allowed us to sign a Business Associate Agreement with Google as part of our HIPAA compliance plan. Virtru.com – used with our email, provides encryption to messages. You will receive notice of a message, and a link to decrypt and read the message on your PC or mobile device.