

VIRGINIA BOARD OF PSYCHOLOGY

GUIDANCE DOCUMENT ON PSYCHOLOGISTS' USE OF SOCIAL MEDIA

This document was developed to guide Virginia's licensed psychologists and members of the Virginia Board of Psychology regarding psychologists' social media use in the context of interpreting and implementing the Board's standards of practice. Please also see the Board's *Guidance Document on Electronic Communication and Telepsychology* wherein specific further information may be found regarding telephone text messaging, email, and other direct electronic communications between providers and patients, including direct service delivery via internet communications. As is explained further in this document, social media use is most apt to intersect with standards of practice that are described in the Board's regulations in 18VAC 125-20-150 and 18VAC 125-20-160.

Introductory Considerations

For the purposes of this document, "social media" refers to digitally mediated technologies that facilitate creating and exchanging information between people via virtual communities or networks, typically on interactive web-based platforms. The nature of content shared through social media may include one's own or others' text, photos, audio and/or video material, and such various other informational formats as graphic and tabular data displays. Social media content is user-posted, but it is not necessarily user-generated. Social media users post and access content through digital connections to the web, typically through popular apps that connect individuals or groups.

A psychologist's social media use is an extension of their professional work and therefore requires the psychologist to adhere to the Board's standards of practice while using social media. Because social media content may be modified or selectively edited or reposted by others, end users may be uncertain of its accuracy and authorship, and original authors may be uncertain of all end users. These characteristics of social media present a challenge to psychologists seeking to represent themselves and their work accurately, protect client confidentiality, operate within the bounds of their competence (including technological competence), and minimize harm. Thus, the purpose of this Guidance Document is to address the psychologist's use of social media platforms, outline potential benefits to a social media policy, and offer specific suggestions for managing the complex interface between social media use and the Board's standards of practice.

Professional and Personal Use of Social Media

Social media apps make no requirements for users to separate professional and personal activities on social media. However, there are clear advantages to psychologists doing so by using distinctly separate professional and personal user profiles and email addresses. This separation helps minimize potential for problems by (a) avoiding self-disclosures that can complicate service relationships and (b) limiting the potential for inadvertent disclosures of confidential information on a psychologist's social media pages.

Professional social media activities involve direct attempts to exchange unidirectional information (i.e., posts from the psychologist to others) with current or prospective clients, students, research participants, referral sources, colleagues, and other professional contacts, perhaps including the public. Examples are posts of various educational activities, marketing efforts, and on-line file exchanges. Psychologists should consider taking precautions against the risks of bidirectional communications (i.e., posts from others to the psychologist) such as when friends, family, or clients make personal posts on the psychologist's social media page, which can blur an attempted distinction or risk a confidentiality breach.

Personal social media activities involve shared exchanges of information with family, friends, social contacts, and personal interest groups. Although users can establish different privacy preferences for their professional and personal social media profiles, personal profiles may be recognizable to current, past, or prospective clients who may find their way to them despite a psychologist's efforts to separate professional and personal social media accounts. In this regard, psychologists may wish to caution friends or family about the possibility of social media requests from unknown people.

Benefits of a Social Media Policy

The use of social media among prospective clients/recipients of psychological services relates directly to the Board's concern about informed consent for recipients of psychological services and minimizing risks for harm. Psychologists should consider preparing and disseminating to prospective and current clients a written social media policy that evolves with the rapid changes in societal uses of social media technology. Important elements of this policy might include a description of how the psychologist will interact with clients and the public professionally on the internet and encouragement to clients to ask questions about matters that may remain unclear. Such a policy may include describing how the psychologist intends to use email and texting (see also the Board's *Guidance Document on Electronic Communications and Telepsychology*). Examples of specific topics that may be covered in a social media policy include the following:

- The purpose, type of content, and intended practices on any professional social media page that is maintained by the psychologist;
- A disinclination to accept clients as fans because this might be interpreted as a client list and threaten confidentiality or professional relationship boundaries;
- A disinclination to conduct an internet search on the client, given risks of misinformation and potential harm to the client and/or the therapeutic relationship;
- That stringent efforts to protect client confidentiality prevent the psychologist from responding even with "likes" to postings from others;
- Instructions to current or prospective clients to avoid the use of insecure social media texting or messaging to contact the psychologist;
- Whether, and if so, when, the psychologist will respond to social media posts from clients and the implications for client safety; and
- Preferred means of contacting the psychologist in an emergency.

The Complex Interface Between Social Media Use and Standards of Practice

As detailed in the Board's *Guidance Document on Electronic Communications and Telepsychology*, the Board of Psychology's Standards of Practice apply directly to the psychologist's social media behaviors. Specific examples follow:

- Preserving confidentiality makes it advisable to
 - Become familiar with and use all available privacy settings on social media platforms;
 - Use trusted and secure networks to access social media accounts;
 - Use encryption if sending protected and private information over social media;
 - Train all staff with any responsibility for assistance in managing a social media account;
 - Consider the potential for an enormously wide audience in all aspects of internet usage; and
 - Not share personal devices, or if devices are shared, ensure that no family member can access any Protected/Personal Health Information (PHI) stored on your device.
- Providing informed consent makes it advisable to
 - Explain benefits (immediate, ever-present, large audience) and risks (disguised identities, miscommunication, misinformation) associated with social media use; and
 - Inform clients about location-tracking apps that could notify others that the client is at the psychologist's office.
- Avoiding multiple relationships makes it advisable to
 - Avoid conflicts of interest in social media use;
 - Manage responsibility for who may access accounts; and
 - Keep personal and professional accounts separate.
- Assuring professional competence makes it advisable to
 - Maintain current knowledge of privacy settings for any social media page on which you post; and
 - Keep abreast of ever-changing technological and practice risks associated with social media use.
- Honest and accurate professional representation to the public makes it advisable to
 - Clarify on social media sites the jurisdiction(s) in which you are licensed or intending to practice through PSYPACT.
 - Represent yourself accurately on the internet and through social media in Virginia and in any other jurisdiction into which you may practice; and
 - Assure that all information regarding credentials, published research findings, curriculum vitae, and other professional representations are neither fraudulent nor misleading.

Further Considerations in the Use of Social Media

Extensive literature exists on the proper use of social media, and psychologists are best advised to consult the references at the end of this document and a great deal of other relevant professional information for more detail than it is practical to provide here. Key considerations from that literature include the following:

- Use only trusted and secure WiFi networks to access practice-related websites;
- Conduct a regularly scheduled risk analysis and ongoing evaluation of data and platform security, maintain website information accuracy, use strong password and data encryption updates, vet of third-party services, and assure client de-identification;
- Maintain adequate technology training for self and all employees;
- Take precautions to prevent damage, theft, or loss of equipment that contains sensitive information;
- Encrypt and frequently back up all stored sensitive information; and
- Use virus protection.

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