

Shadowfax

Title	Communications Policy
Policy Number	ORG.1019.000.000
Initiating Authority	Policy Committee
Approved By	Compliance Committee 9-22-21
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Associated Policies	
Associated Procedures	
Associated Documents	

I. POLICY STATEMENT

Shadowfax is committed to providing a high-quality standard of services and to providing accurate and timely information to internal and external stakeholders via both scheduled and ad-hoc communications. It is the responsibility of the Compliance Committee to implement this policy and has day-to-day oversight of compliance with this policy, established guidelines, and associated procedures.

II. PURPOSE

The purpose of this policy is to provide a framework for communicating accurate, consistent and timely information to Shadowfax stakeholders in a way that supports the Shadowfax brand, business objectives, legal, regulatory, and contractual obligations, and avoids unnecessary liability and business risk.

III. SCOPE

This policy applies to all Shadowfax staff, Board of Directors, temporary and sub-contracted staff and all Shadowfax volunteers.

This policy applies to all external communications channels for any external stakeholder, including individuals. External communications channels include, but are

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not limited to, company websites, social media, e-mail, mail, print, presentations and other hard-copy formats, the media, i.e., press, television, radio and other news sources.

This policy also applies to internal communications with full-time, part-time, temporary and sub-contracted staff and all volunteers.

This policy does not prevent departments or programs from communicating with their staff, individuals and/or individuals' families in the event of an operations or business emergency which requires immediate communications for health and safety reasons, for example in the event of an emergency evacuation at a Shadowfax locations and residential locations.

IV. GENERAL

Based on the standards cited in:

- Health Information Portability and Accountability Act (HIPAA)
- 55 Pa. Code § 52, § 6100 and Code § 6400, § 2380, § 2390
- contracts into which Shadowfax has entered
- business communication best practices.
- accreditation bodies

Definitions

- **Confidential information** – Information in any form related to Shadowfax business and stakeholders (both internal and external) that the organization does not wish to be made public or is non-public for legal or regulatory reasons. Information does not have to be marked as “Confidential” to be confidential.

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- **External Stakeholder** – An individual or group outside of Shadowfax who could either influence or be influenced by Shadowfax’ work, such individuals, community partners, government agencies, etc.
- **Internal Stakeholder** – An individual or group internal to Shadowfax who either could influence or could be influenced by Shadowfax’ work, such as staff, third party business associates, volunteers, etc.
- **Media** – Mass communication channels: television, newspapers, radio, the Internet, press, etc.
- **PHI and ePHI** – PHI is “Protected Health Information”. PHI includes individually identifiable health information held or maintained by Shadowfax or Shadowfax business associates acting on Shadowfax’ behalf. ePHI is “Electronic Protected Health Information”. ePHI is PHI created, stored, transmitted, or received in any electronic format or media.
- **Operations or Business Crisis aka “Crisis”** – A situation, from internal or external sources, that can have a significant disruption or threat to Shadowfax operations.
- **Social media** – Online ways to communicate with individual people or groups of people for personal or business reasons. Examples of social media include, but are not limited to, Instant Messenger, Instagram, Facebook, Twitter, LinkedIn, blogs, and Wikis.

V. POLICY

Shadowfax supports an open-door communication policy.

All staff have an obligation to contact their supervisor immediately in the event they obtain knowledge of any potential or actual litigation, external audit, investigation, unplanned licensing agent, and law enforcement or similar proceeding involving the Corporation.

Regardless of the type of communications method, communications will:

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Note: The term “Individual” is synonymous with resident, client, patient, consumer, or participant.

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- preserve company confidential information
- preserve staff and participant confidentiality
- protect protected health information (PHI) and electronic protected health information (ePHI), according to HIPPA
- follow copyright or trademark laws, and other legal, regulatory and contractual obligations
- not contain information that is intentionally materially inaccurate, false or misleading
- Support the organization brand and mission

It is in the best interests of Shadowfax and the communities it serves to provide accurate and consistent information to both internal and external stakeholders; therefore, the Compliance Committee has responsibility for:

Media Relations

Shadowfax websites and social media

Marketing Materials, company communications, and program communications for external stakeholders in e-mail, print or other hard-copy and electronic formats for external publication

Maintaining Shadowfax branding, logos, style guide and communications templates

Reviewing Shadowfax organizational, department and program internal communications prior to publishing.

Crisis Communications

Public Policy Statements

EXTERNAL COMMUNICATIONS

No written or verbal communications on behalf of Shadowfax to external stakeholders (media, volunteer organizations, community groups, public officials, social media, etc.) should be made unless pre-approved by the Shadowfax Compliance Committee.

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This policy item applies to any Board of Directors member, full-time, part-time, temporary and sub-contracted staff and all Shadowfax volunteers. The Shadowfax Compliance Committee will seek, as appropriate, the advice of Shadowfax management, Board of Directors, and/or legal counsel in developing external and internal communications.

Media Relations – The Compliance Committee is the point of contact for external media. Shadowfax will select and train certain members of management to be designated spokespersons for Shadowfax. All Shadowfax external media statements are pre-approved and issued by the Compliance Committee or the designated spokesperson. All media contacts must be forwarded to the Shadowfax Compliance Committee immediately upon receipt.

Websites and Social Media -- Only designated, pre-approved, and trained personnel may update Shadowfax websites and social media. Shadowfax social media contents may not contain personal opinions, inappropriate content, threats, or defamatory statements.

Marketing Materials, Company Communications, and Program Communications for External Stakeholders -- Shadowfax communicates with external stakeholders in many forms, for example in e-mail, print, and electronic formats. The Shadowfax Compliance Committee has responsibility for creating Shadowfax marketing materials and other external communications and providing templates and guidelines for communications that programs may do on their own.

Any communications for individuals should be font size 14 or higher, in a sans serif font.

INTERNAL COMMUNICATIONS

Program Communications - Communications in the course of delivering program services – Each program director, manager or their designee is responsible for communications with individuals and their families in the course of delivering program services.

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Internal Communication Standards for Organizational, Department and Program - The Shadowfax Compliance Committee has responsibility for creating templates and guidelines for internal communications, including, at a minimum:

- email and voicemail greetings
- standard email signature
- email Shadowfax confidentiality statement
- company intranet sites
- reviewing and approving major internal communications.

Any communications for individuals should be font size 14 or higher, in a sans serif font.

Mandatory Postings for Employers – The Human Resources department is responsible for required postings regarding applicable Federal and state labor laws.

Languages – Shadowfax will comply with regulations governing the languages used to communicate with participants/individuals.

Photography – Individual’s photos will not be used without appropriate pre-authorization

Style Guide – To protect Shadowfax Intellectual Property and brand and to provide consistency across the organization and its communications channels, all communications will follow the Shadowfax brand and associated templates as directed by the Shadowfax Compliance Committee.

EMAIL COMMUNICATIONS

Staff members must have a standard email signature and Shadowfax confidentiality statement at the bottom of emails.

Staff members must use the automatic Out of Office message feature when away from the office for scheduled and/or planned time off.

Every effort should be made to respond to emails within two (2) working days, even if only to acknowledge receipt of the message and that it is being worked on, except for scheduled/planned time off and illness.

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Email should not be the primary method of communication in an emergency or time-sensitive situation

CRISIS COMMUNICATIONS

In the event of a major operations or business crisis, it is critical that internal and external communications are developed quickly and consistently, with State/Federal mandates, legal and/or regulatory needs, business needs, operational needs, and stakeholder needs addressed.

Shadowfax's CEO is responsible for declaring a crisis and establishing a Crisis/Emergency Response Team. If the CEO is unable to function in his or her normal business capacity, the Shadowfax Board of Directors is responsible for declaring the crisis and assembling the team. The Shadowfax Compliance Committee shall always be included as members of the Crisis/Emergency Response Team and has responsibility for developing and issuing crisis communications with the appropriate management, Board of Directors, and/or legal approvals.

VI. **OVERSIGHT**

Shadowfax's Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
2. Periodically reviewing this Policy and monitoring compliance to it.
3. Training responsible parties on their obligations under the Policy.

Revision History

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Name	Date	Reason for Changes	Version