

PARKER UNIVERSITY CHIROPRACTIC CLINICS MARKETING POLICY

101421

Social Media

Interns are permitted to post their status as a Parker University chiropractic intern on social media and are personally responsible for the information they publish. The following is important information to consider when posting on social media as an identifiable intern of Parker University Chiropractic Clinics (PUCC):

- All postings on social media are permanent.
- An intern should understand the rules that apply to their behavior:
 - The Texas Chiropractic Act (Texas Occupations Code) and Texas Board Rules (Texas Administrative Code) www.tbce.state.tx.us.
 - HIPAA privacy rules Codes of conduct explained in the Parker University Student Handbook, The Doctor of Chiropractic Program Catalog, and rules of PUCC.
- When an intern posts information they must identify their first and last name, their status as a
 chiropractic intern, and the fact that a chiropractic intern is a future chiropractor in training who
 is unlicensed and operates under the supervision of a licensed doctor of chiropractic.
- Interns may never communicate directly with an established patient via social media.
 Communication involving questions, scheduling, health conditions, response to care, and information about clinic procedure should be conducted in person or via phone conversation and documented in the patient file communication log.
- Interns may distribute event flyers created by and approved by PUCC.
- Very few people in Parker University are official spokespeople for the university so interns must
 make clear that they are speaking personally and not for the university. An intern can use a
 disclaimer like "The postings on this site are my own and do not necessarily represent the
 position, strategy or opinions of Parker University".
- Always write in the first person.
- Interns should be professional and respect their audience and not engage in any conduct that would not be acceptable in PUCC. Interns should also show proper consideration for topics that may be considered objectionable or inflammatory (like religion or politics).
- · Advice:
 - Interns are personally responsible for the content they publish on blogs, wikis or any other form of user-generated media. Please remember that the internet never forgets. This means everything published will be visible to the world for a very, very long time. Common sense is a huge factor here. Interns should not publish something that makes them even the slightest bit uncomfortable. When unsure, an intern should speak to their assigned clinic faculty doctor prior to publishing / posting.
 - Be aware that others will associate interns with Parker University when they identify as such. An intern should ensure that their profile and related content is consistent with how they wish to present themselves to patients, faculty, classmates, and university administration.

Business Cards and Communication

Interns must utilize the Parker University approved format for their business cards. Business cards distributed by interns must be ordered at the university bookstore to ensure proper formatting. Interns may write their phone number on a business card for arranging marketing activities that have been

approved by their assigned clinic faculty doctor or for callback from a potential new patient. Interns may not communicate with members of the public in a manner that renders a diagnosis, promises a result or particular response treatment, violates the practice of chiropractic as described under Texas Administrative Code rule 78.1 (Scope of Practice), or violates a person's rights to health information privacy explained in HIPAA.

Interns may communicate with members of the public to:

- Identify a musculoskeletal health concern but not seek to evaluate or diagnose the concern
- Determine the severity of a musculoskeletal health concern relative to a person's activities of daily living
- Promote understanding of health and disease prevention through influencing a person's structural, ergonomic, and functional lifestyle issues
- Describe subluxation and subluxation complex, as defined by the Texas Administrative Code rule
 78.1 (Scope of Practice)
- Promote service performed at Parker University Chiropractic Clinics
- Coordinate a visit to Parker University Chiropractic Clinics

Once a member of the public becomes a new patient, all further (i.e., voice, on-line, text) communication between an intern and a patient must be documented in a history of present illness, treatment record, or communication log.

- Text and electronic communication must be captured as a screen print
- Voice communication must reproduce in a manner that accurately represents the content of the conversation

Distributing Marketing Materials

Interns must have all marketing materials intended for distribution to the public approved by clinic administration. Examples of marketing efforts that require approval include:

- · Creating any print or online marketing
- Parker Logo usage
- · Written copy or communication for marketing

Media Relations

Interns cannot contact members of the media on behalf of Parker University Chiropractic Clinics. Interns, staff, and faculty that have a story idea to share with members of the media or have been contacted by the media should contact clinic administration.

Patient Acquisition

Interns are responsible for planning and creating new patient acquisition opportunities. An intern's assigned Clinic Faculty Doctor (CFD) should engage interns in marketing activities that help develop skills in:

- 1. Identifying types of patients interns want to help
- 2. Determining how service meets the needs of a potential patient
- 3. Creating a relevant patient message
- 4. Finding locations where this potential patient can be met
- 5. Deciding the best way to deliver a planned message to the potential patient

Once a marketing idea is planned, the intern's assigned CFD completes a request for necessary funds and resources.

It is important for the CFD and intern to file the request within the appropriate timeline. Community education events requesting resources and money require 4 weeks for processing and preparation. Events that do not require money may be processed with a minimum 2 week application.

Parker Clinics also plans 15-20 events each year and e-mails intern participation opportunities. Assignment to these events is managed on a first reply basis. These events usually fill up quickly. Interns should not consider these events sufficient opportunity for achieving necessary course and graduation requirements.

It is vital that interns participate strongly in developing a marketing plan because it is a significant part of a field chiropractor's job.

Therapeutic Community Events

Community events that include patient diagnosis and treatment establish doctor-patient relationships and are not permitted.

Intern Responsibility

Interns are responsible for attracting patients to complete their graduation quantitative services as described in the clinic course syllabi.

Conduct at Community Outreach Events

- Chiropractic interns cannot conduct business allowed for licensed healthcare providers.
- The site of the community outreach should prominently display the name of Parker University
 Chiropractic Clinics (PUCC) as required by Texas Administrative Code rule 77.1 (Advertising and
 Public Communications) *. Signage and materials featuring the PUCC logo and information can
 be located in the box of marketing materials supplied for the event.
- Interns participating in community outreach must never describe services that are inconsistent
 with the practice of chiropractic as described under Texas Administrative Code rule 78.1 (Scope
 of Practice)* and comply with Texas Administrative Code rule 77.1 (Advertising and Public
 Communications)*.
- Interns may not participate in any community activity that involves diagnosis or treatment.
- The notice to the public advising about the spinal screening and method to contact the Texas Board of Chiropractic Examiners to report complaints about the screening must be displayed prominently. The sign can be located in the box of marketing materials supplied for the event.
- Interns must comply with the dress code policy while conducting a community outreach event. *Interns should only participate in a community event when they understand Texas Administrative Code rules 77.1, 78.1, and 77.4.

Participant Privacy

Interns may never maintain any information about members of the public who participate in a community outreach event. An intern's assigned Clinic Faculty Doctor may access participant information for future use.