POLICY AND PROCEDURE MANUAL

SUBJECT Social Media	ACCOUNTABILITY Internal Operations Committee	Effective Date: October 1, 2026	Pages: 2
REQUIRED BY	Managed Care Rules: PIHP Contract Section: Other:	Last Review Date:	Past Review Date:
Policy: ☒ Procedure: ☐	Review Cycle: Annual Author: Chief Information Officer	Responsible Department: Information Technology	Reviewers: NMRE CEO

Definitions

Michigan Department of Health and Human Services (MDHHS): The principal department of the state of Michigan, headquartered in Lansing, which provides public assistance, child and family welfare services, and oversees health policy and management.

Northern Michigan Regional Entity: Region 2 Prepaid Inpatient Health Plan (PIHP) covering Alcona, Alpena, Antrim, Benzie, Charlevoix, Cheboygan, Crawford, Emmet, Grand Traverse, Iosco, Kalkaska, Leelanau, Manistee, Missaukee, Montmorency, Ogemaw, Oscoda, Otsego, Presque Isle, Roscommon, and Wexford counties in northern Lower Michigan.

Northern Michigan Regional Entity Internal Operations Committee (IOC): A committee comprised of key, senior NMRE staff and/or heads of departments.

Prepaid Inpatient Health Plan: A term contained in federal regulations from the Centers for Medicare & Medicaid Services. It means an entity that 1) provides medical services to enrollees under contract with the state Medicaid agency based on prepaid capitation payments, 2) includes responsibility for arranging inpatient hospital care, and 3) does not have a comprehensive risk contract.

Social Media: Any online social platform used to distribute messages, photos, links, or information to the public.

Substance Abuse and Mental Health Services Administration (SAMHSA): The agency within the U.S. Department of Health and Human Services that leads public health efforts to advance the behavioral health of the nation. SAMHSA's mission is to reduce the impact of substance abuse and mental illness on America's communities.

Purpose

This policy establishes how NMRE's social media presence is managed day to day and defines what content the social media lead may publish independently versus what must be reviewed and approved by the Internal Operations Committee (IOC). The policy exists to let routine, low-risk communication move quickly while ensuring anything with reputational, clinical, or political exposure receives deliberate review before it is public.

Policy

Northern Michigan Regional Entity (NMRE) maintains an official social media presence to support its mission of serving the mental health and substance use disorder needs of the 21-county region. Social media activity must uphold NMRE's standards for accuracy, neutrality, privacy, and professionalism. All content published on NMRE platforms will align with organizational values, avoid political positioning, protect individual confidentiality, and reflect NMRE's role in promoting access, recovery, prevention, and workforce development.

To ensure consistent and responsible communication, NMRE uses a structured three-tier content framework that defines what may be posted independently and what requires review or escalation. Routine, low-risk content may be posted without additional approval, while original or sensitive content requires Internal Operations Committee (IOC) review, and high-risk or crisis-related material must be routed directly to leadership. This policy ensures timely communication while safeguarding NMRE's reputation, contractual obligations, and the privacy of the individuals and communities it serves.

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Procedure

A. Guiding Principles

- Mission first. Every post will trace directly back to NMRE's role serving mental health and substance use disorder needs in the 21-county region — services, access, recovery, prevention, and workforce.
- Neutral ground. NMRE operates in a politicized policy space. Accounts must not comment on, take positions on, or amplify content related to partisan politics, legislation debates, election-related matters, or other organizations' political statements — even when adjacent to the NMRE's mission.
- No individual clinical detail. Posts must never reference identifiable clients, specific treatment details, or anything that could compromise privacy, even with apparent consent.
- When in doubt, defer to Tier 2 or 3. The default assumption for anything original is that it requires review. Tier 1 is a narrow, explicit list — not a general comfort level.

B. The Three-Tier Content Framework

Every piece of content will fall into one of three tiers. The tier is determined by category, not by the social media lead's personal judgment of "how risky this feels" — this will keep the line consistent regardless of who is posting.

THREE-TIER CONTENT FRAMEWORK	
TIER 1 — POST FREELY	
Description	Fixed, pre-approved categories. No individual sign-off is needed — the category itself is the approval.

THREE-TIER CONTENT FRAMEWORK	
Examples	• Resharing NMRE's own previously published materials (newsletters, approved flyers, website content) • Recognition posts using IOC-approved templates/graphics (staff anniversaries, awareness-month observances) • Logistics: office closures, hotline hours, reminders for already-approved events • Unedited reshares of MDHHS/SAMHSA/federal partner content, with no added commentary
TIER 2 — DRAFT, THEN IOC APPROVAL	
Description	Anything original. May be drafted and queued at any time, but may not post until approved.
Examples	• Any post with original wording about programs, services, or outcomes • Anything responding to current events or community issues • Anything that could be interpreted as taking a position, directly or indirectly • Stories, quotes, or photos involving an identifiable individual • Event photos
TIER 3 — ESCALATE, DO NOT DRAFT FOR SOCIAL	
Description	Routed straight to leadership, outside the normal social workflow entirely. Not drafted, queued, or discussed as a social post until leadership directs otherwise.
Examples	• Litigation, MDHHS restructuring, or contract status • Any media, elected official, law enforcement, or advocacy group inquiry • Crisis-adjacent content (death, overdose cluster, facility incident) • Any material depicting or referencing drug use — including pills, needles, syringes, drug paraphernalia, or similar imagery, even in a harm-reduction, awareness, or "before/after" recovery context

Note on the drug-imagery rule: this applies to the imagery and depiction itself, not the topic. Substance use disorder services, treatment, and recovery remain core to NMRE's mission and are absolutely postable — the restriction is specifically on visuals of drugs, paraphernalia, or use, which route to Tier 3 regardless of intent or framing.

C. Submission & Review Workflow

- Tier 2 drafts will be logged in the shared review queue as soon as they're written — no need to wait for the IOC meeting to submit.
- The IOC will review the queue at its regular meeting, held every two weeks.
- Each item will be marked "Approved," "Approved with Edits," or "Declined," with a brief written rationale for edits or declines so the pattern can inform future drafts.

- Approved posts may be published any time after sign-off; they are not required to post on the meeting date itself.
- Tier 3 items will never be entered into the social queue. They will go directly to the Operations Director / leadership by email or in-person flag.

D. Off-Cycle / Emergency Review

A strict two-week cycle works for planned content but isn't built for time-sensitive Tier 2 items (e.g., a same-week community event or a fast-moving local story). To avoid either freezing communication or bypassing review, one emergency reviewer is authorized to approve Tier 2 content outside the regular IOC meeting:

- The Executive Administrator will be the designated emergency reviewer for off-cycle Tier 2 approvals.
- Emergency approval authority will apply only to Tier 2 content. Tier 3 material will never be eligible for off-cycle approval under any circumstance.
- Any post approved off-cycle will be logged and reported to the full IOC at its next regular meeting for visibility, even though it has already been published.
- If the emergency reviewer is unavailable, the post will wait for the next regular IOC meeting — off-cycle approval is a pressure valve, not a second standing approver.

E. Roles

- Social Media Lead: drafts all content, publishes Tier 1 independently, submits Tier 2 to the queue, and routes Tier 3 to leadership without drafting it.
- Internal Operations Committee (IOC): reviews and approves/declines Tier 2 content at its biweekly meeting; receives retroactive reports of any emergency approvals.
- Emergency Reviewer (Executive Administrator): available between IOC meetings to approve time-sensitive Tier 2 content only.
- Operations Director: sole point of contact for Tier 3 material and any external media, legal, or political inquiries.

F. Review of This Policy

This policy will be revisited at least annually, or immediately after any incident that tests its boundaries (a near-miss, a Tier 2 item that should have been Tier 3, or a change in the political landscape in which NMRE operates).

Approval Signature



Chief Executive Officer

September 17, 2026

Date