Website Governance

To uphold the highest standards of security, compliance, and professional excellence, Mount Sinai Health System prohibits the creation and maintenance of independent websites (also known as "microsites" or "off-the-ranch" sites) unless explicit permission from the Digital Marketing and Branding teams has been granted.

This policy applies to any website or URL containing the Mount Sinai Health System name, logo, contact information, or representing one's professional work as a Mount Sinai Health System faculty member. Websites in violation are subject to potential shutdown and Mount Sinai is authorized to take further action, including legal, if necessary.

In addition to constituting a breach of the faculty contract, creating and maintaining independent websites may also represent a conflict of commitment. This commonly happens through revenue-generating website content that creates competing interests with Mount Sinai Health System (ads, sponsorships, affiliate marketing, paid content, and consulting services). Independent websites may also compromise clinical practice standards and research integrity through the premature or selective disclosure of findings, and/or the promotion of non-institutional treatments that contradict Mount Sinai's standards of care.

The following key compliance considerations further support our policy.

Protected Health Information (PHI) and Personally Identifiable Information (PII) Considerations

- Independent websites often lack the necessary safeguards for Protected Health Information (PHI) and Personally Identifiable Information (PII).

- Health Insurance Portability and Accountability Act (HIPAA) compliance requires specific security protocols and monitoring systems that are available through Mount Sinai's digital infrastructure.

- Independent sites may inadvertently expose patient information through inadequate security measures.

- Data breaches involving PHI/PII can result in severe penalties, with fines up to $50,000 per violation.

Legal, Regulatory, and Reputation Considerations

- Independent websites often violate Mount Sinai's marketing guidelines, standards, and trademark usage.

- Mount Sinai is committed to ensuring its websites are accessible to all users, per the Web Content Accessibility Guidelines (WCAG) 2.1 level AA. Independent websites often exclude people with disabilities from accessing information.

- Independent sites risk misalignment with institutional policies and digital best practices, placing Mount Sinai Health System's reputation at risk.

For further context please visit:

- **Office of Industry Engagement and Conflicts of Interest**
- **Mount Sinai Brand Center**
- **Mount Sinai Brand Center: Registered Trademark Symbol Use Guidelines**
- **Mount Sinai Brand Center: Logo Usage**
- **American Medical Association's Conflict of Interest in Patient Care**

For any questions, please contact the Office of Industry Engagement and Conflicts of Interest: Conflicts.of.Interest@mssm.edu