

# North Carolina Infant-Toddler Program Procedures

## *Texting*

### Introduction

The increased use of cell phones as a primary form of communication, with text messaging as the chosen form for many people, has led to an increase in the use of texting in a variety of contexts, including health/medical settings. This document is intended to provide guidance for the use of text messaging to communicate with parents/caregivers, as well as other providers working with the family, in a manner that is consistent with Federal and State privacy laws.

This guidance provides for the use of four categories of text messages from CDSA staff to families and providers:

- Attempts to make initial contacts with families
- Appointment related texts with parents/caregivers, including Family Outcomes survey information for semi-annual IFSPs (Individual Family Service Plans)
- Appointment related texts with providers and Local Education Agency staff
- Providing documents to families, via DocuSign SMS, who choose to receive documents in this manner.

### PROCEDURE

1. Do not include Personally Identifiable Information (PII) or Protected Health Information (PHI) in the subject-line or in the body of a text message. This includes any combination of name, initials, date of birth, ID number, SSN number, or any other information that could be combined to identify the child.
2. Written consent is not required for texting to establish/re-establish contact with a family. Staff **must** use wording below when reaching out through text as one of the multiple and varied ways to contact a family during the referral phase.
  - a. "This is XX with the CDSA. I am trying to follow up with you to discuss a referral made by [name of referral source] to the NC Early Intervention Program/CDSA. Please call me at xxx-xxx-xxxx so we can discuss the program further and determine your interest.
3. To receive text messages for appointment reminders and program related documents, a parent or caregiver must opt in by signing a written consent form.
  - a. The consent form provides parents with the following information:
    - A statement that the recipient's cellular service provider may charge the recipient a fee for transmitting and delivering text messages.
    - Instructions for how to opt-out of receiving text messages with appointment reminders.

- A request that clients receiving text messages with appointment reminders notify the program of phone number changes, and guidance about how to provide that information.
4. Information sent by text message, whether to families or providers, must be limited to the following:
    - a. Sender first name (optional) or other identifier such as “your service coordinator”
    - b. Agency name or other identifier such as “the CDSA”
    - c. Child’s first name
    - d. Appointment date and time information
    - e. Link to Family Outcomes Survey (where applicable)
    - f. Telephone number for parent or provider to call with questions or to change the appointment
    - g. An example text message to a family to confirm an appointment: "This is ----- (state your name) with the CDSA. I am texting to confirm your child's appointment for tomorrow (month/day) at (time). Please contact me at XXX-XXX-XXXX if you need to reschedule or have any questions."
    - h. An example text message to a family receiving Docusign documents: "This is ----- (state your name) with the CDSA. I am texting to inform you that we have sent program documents to you via text message through Docusign. Please contact me at ----- (phone number) if you have any questions about these documents. Please review and sign (as applicable)."
    - i. An example text message to a provider or LEA to confirm an appointment: “This is ----- (your name) with the CDSA. I am texting to confirm ----- (child’s first name- ONLY) appointment for ----- (therapy session/IFSP/TPC) meeting scheduled for ----- (appointment date and time). Please contact me at ----- (phone number) if you need to reschedule or have any questions."
    - j. Opt-in forms should be stored in accordance with ITP record retention requirements.
    - k. Parents should be informed of the option to receive appointment reminders by text at their first contact with their EISC. Parents should be reminded on a periodic basis that they may opt in or opt out of receiving text messages by dating and signing the revocation section of the consent form and that their phone numbers should be current.
  5. Administrative, Physical, and Technical Safeguards:
    - a. If a mobile device is used to send appointment reminders, staff members **must** delete the messages after the communication is completed and necessary information is recorded in the child’s record/BEES.
    - b. Full child and parent names must not be stored in the address books or contacts lists of mobile devices.
  6. Staff cannot be required to use their personal cellular phones for texting and, if they do, they assume all risks and costs associated with the use of their personal cellular phones.