

North Carolina Infant-Toddler Program (ITP) Guidance for Texting by CDSA Staff

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 for appointment reminders 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 two categories of text messages from CDSA staff to families and providers:

- 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
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. Information sent by text message, whether to families or providers, must be limited to the following:
 - Sender first name (optional) or other identifier such as “your service coordinator”
 - Agency name or other identifier such as “the CDSA”
 - Child’s first name
 - Appointment date and time information
 - Link to Family Outcomes Survey (where applicable)
 - Telephone number for parent or provider to call with questions or to change the appointment
 3. To receive text messages with appointment reminders, a parent or caregiver must opt in by signing a written release form.
 - a. The release 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.
 - b. Opt-in forms should be stored in accordance with ITP record retention requirements.

- c. 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.
4. 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/HIS.
 - b. Full Client and parent names must not be stored in the address books or contacts lists of mobile devices.
5. 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.