



**Policy Title:** MAAC Client Texting Communications

**Creation Date:** July 17, 2025

**Last Revision Date:** July 2025

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## **PURPOSE**

MAAC is committed to quality service for individuals and families receiving services from any of the organizational programs. This includes respectful and effective communication from the organization. This policy outlines the guidelines, expectations, and any requirements for contacting clients via text messaging and other similar communications.

## **POLICY & PROCEDURE**

The term “client” will be used to indicate participants, customer, and any other related terms to indicate a program recipient.

### **A. Staff Access to & Use of Texting Services**

1. **Access:** Only designated program staff will have access to any relevant client information and use of the texting services.
2. **Training:** Those designated employees and program management will be trained by the contracted texting company and MAAC’s Evaluation & Compliance team on any specific logins and workflows for their program.
  - a. Training will minimally include staff on allowed message types, opt-out handling, handling complaints and incidents, and other relevant customer service needs.
3. **Use:** Only text templates created for a specific purpose will be used to send to clients
  - a. Messages sent by the organization will clearly identify as coming from MAAC
  - b. Codes or sender IDs that hide organizational identity or mask identity will not be used
  - c. Text language will clearly state the purpose of communications and offer clients opportunities to opt-out of communications at any time
4. **Message content and Privacy & Confidentiality:**
  - a. Sensitive personal information such as account number, passwords, payment information will not be shared or requested via text message communications
  - b. Health or financial information should be avoided in text message communication unless required for client services and follow applicable laws and regulations such as HIPAA.
5. Designated phone lines will be used, and texting will not be allowed using staff personal phones or numbers, unless previously approved for a specific need by the program director or designee.

## B. Contacting Clients

### 1. Consent Requirements

- a. Expressed written consent for marketing or promotional texts will be obtained prior to any text communications being sent. This will take place during the program's application process or at the designated step to enroll a client and collect necessary information such as client cell phone number.
- b. Consent language will include some variation of the following message:
  1. By checking this box and submitting this form, you agree to receive text messages from MAAC related to your program participation, events, reminders, and important updates. Message and data rates may apply. Message frequency will vary. Carriers are not liable for delayed or undelivered messages. Reply STOP to cancel. View our Terms of Service and Privacy Policy.
- c. Client consent may be documented via online forms, text opt-ins, emails, or paper file.
  1. Any verbal consent would need to be followed up with written documentation.
  2. Documentation may be stored in client files or program logs and similar records stored on site or in a designated database including Salesforce.
    - i. Records should maintain dates of consent, opt-outs with timestamps when applicable, message content, and delivery of records.
  3. Records should be kept if the customer receives communications or until they request to opt out and stop all communications. Or a minimum of five years per compliance with the Telemarketing Sales Rule | Federal Trade Commission

### 2. Timing and Frequency

- a. Messages will be sent between business hours. Messages should not be sent before 8 a.m. or after 9 p.m. local time unless designated for a specific service approved by the program director or designee.
- b. Frequency of messages sent will vary depending on program and client needs. However, programs should follow established times for communications sent to clients.
- c. The number of messages per day on the same topic will be limited and avoid sending clients overwhelming amounts of messages on the same topic.

### **3. Opt-Out Mechanism**

- a. Clients can opt out of receiving communications at any time. This may include a simple opt-out option in every message (e.g., 'Reply STOP to unsubscribe').
- b. The program sending the text messages will need to honor opt-out requests immediately, but no more than within 10 business days of the request.
- c. A one-time confirmation of the opt-out may be sent as the final message if a client has opted out and will be honored.

### **4. Terms of Service**

Text message communications will include links to this policy and terms of service.

### **SUPPLEMENTAL DOCUMENTS OR RELATED POLICIES**

Texting Services Terms of Service

### **REVIEW & APPROVAL**

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Adolfo Ventura VP of Programs & COO

Date

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MAAC Director or Program Representative

Date