

Document Title	Opt-in/CTA Policy for Aveva Public Health Solutions SMS Messaging
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This policy outlines the requirements for obtaining and documenting opt-in consent for SMS messaging. The messages sent by Aveva Public Health Solutions are **informational and transactional** in nature, such as appointment reminders, public health alerts, or notifications about new information on a patient portal. **It is our policy not to transmit Protected Health Information (PHI) via these text messages.** This policy is designed to ensure all SMS communications are transparent, respectful, and fully compliant with federal regulations such as the **Telephone Consumer Protection Act (TCPA)** and **HIPAA**.

1. Opt-in Consent Requirements

We are committed to obtaining **documented prior express consent** from all users before sending any SMS messages. Consent can be captured in two ways: through a provider during a patient interaction or directly by the patient on a registration form.

Compliance Note: While the TCPA requires a less formal "prior express consent" for purely informational messages, we have adopted a more robust, documented consent process. This best practice ensures we have a verifiable record of patient consent, protects us in the event of a dispute, and aligns with patient expectations of privacy for health-related communications.

Key Principles:

- **Affirmative Patient Action:** Regardless of the method, consent must be an active choice.
 - **No Pre-Checked Boxes:** The consent checkbox will never be pre-checked.
 - **Clear Disclosures:** All required disclosures must be made clearly and conspicuously at the point of opt-in, whether verbally by a provider or in writing on a form.
 - **Easy to Withdraw Consent:** Patients must have the ability to withdraw consent (opt-out) at any time.
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2. Provider-Captured Consent Process

This process is used when a provider obtains a patient's verbal consent during a direct interaction.

- **Provider-Led Consent Capture:** Providers are responsible for verbally obtaining consent.
 - **Documentation in Web Form:** The provider will document the patient's verbal consent by checking a dedicated, un-checked box within our web form. This action serves as the digital record of the patient's consent.
 - **Provider Script for Capturing Consent:**
 - **Provider:** "To help us keep you informed, we'd like to offer you the option of receiving important messages from Aveva Public Health Solutions via text message. These messages may include things like appointment reminders, public health alerts, or a notification that you have new information on your patient portal.
 - Please be aware that these messages will not contain Protected Health Information, but they will be linked to your health care.
 - Message and data rates may apply depending on your phone plan, and message frequency will vary.
 - If you ever wish to stop receiving these messages, you can simply reply 'STOP' at any time. Replying 'HELP' will provide you with more information.
 - Are you comfortable with these terms and would you like to receive text messages from us?"
 - **If patient says "Yes":** The provider checks the box in the web form.
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3. Patient-Entered Consent Process (on a Registration Form)

This process is used when a patient provides consent directly on a digital or paper registration form.

- **Registration Form Placement:** The consent option should be prominently displayed on the form, close to where the patient provides their phone number.
- **Dedicated Checkbox:** A dedicated, un-checked checkbox must be used for consent.
- **Required Language for the Form:** The following language must be presented clearly and conspicuously next to the consent checkbox:

Check this box to receive **informational and transactional text messages** from **Aveva Public Health Solutions**, such as appointment reminders and patient portal notifications. These messages will not contain Protected Health Information. Message and data rates may apply. Message frequency will vary. You can reply **STOP** at any time to unsubscribe, and

HELP for more information. Consent is not a condition for receiving treatment.

4. Post-Opt-in Procedures

After a patient opts in via either method, an immediate, automatic confirmation message will be sent.

The confirmation message will include:

- A welcome message from **Aveva Public Health Solutions**.
- A confirmation of their subscription and the type of messages they will receive.
- A reminder that "**Msg & data rates may apply.**"
- Instructions for **opting out** (e.g., "Reply STOP to unsubscribe").
- Instructions for **getting help** (e.g., "Reply HELP for more information").

5. Opt-out (Unsubscribe) and Privacy

- We will immediately honor all opt-out requests, recognizing the keyword **STOP**, and sending a single, final confirmation message.
- All personal data, including phone numbers and consent records, will be handled in compliance with our Privacy Policy and all applicable laws, including **HIPAA**. We will not sell, rent, or share user phone numbers for any marketing or promotional purposes. All opt-in records will be securely logged and stored.

6. Additional Information

- Messages sent can include informational messages such as:
 - Appointment reminders
 - Notification of available information on the user's secure portal
 - Public Health announcements
 - Clinic Hours change notifications
 - Non-PHI provider messages
- Message Frequency Varies
- Message & Data Rates May Apply

- All messages will be in compliance with Aveva's Privacy Policy: <https://www.avevatech.com/privacypolicy>
- Carriers are not liable for delayed or undelivered messages