Using Text Messaging for Communicable Disease Follow-Up at Local Health Departments
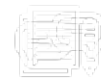
Cell Phone Policy Outline

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I. BACKGROUND

Why Text?

Text messaging is a useful tool for communicable disease follow-up, particularly for sexually transmitted infections (STIs) and HIV. It has become increasingly difficult to reach clients through traditional communication methods, including letters, phone calls, and field visits. Some clients frequently change addresses and many do not respond to contact attempts via phone call or mail. As a result, follow-up can require an extensive time commitment and exhaust resources. Text messaging is a tool to increase the success and decrease the costs of disease follow-up and is particularly relevant for populations disproportionately impacted by STIs and HIV. Research shows that 97% of Americans ages 18–29 send text messages and that texting is more widely used by African Americans and Latinos than whites.[1] Texting is common among other age groups as well. Studies show that 81% of American cell phone owners send or receive text messages.[1]

Purpose of this Policy Outline

This document provides an outline of the elements included in policies covering the use of texting for communicable disease follow-up. As with any new tool used for disease follow-up, guidance and policies are needed in order to ensure that the technology is being used effectively, that confidentiality will be maintained, and that processes are in place for storing records and documenting follow-up. The Bureau of Communicable Diseases is providing policy development resources to support local and tribal health departments who wish to incorporate texting into their disease follow-up activities in Wisconsin.

Legal Disclaimer

These materials are not intended to serve as legal advice. Individuals and entities who need legal advice are advised to consult with their legal counsel. The Department of Health Services (DHS) expressly disclaims any warranties or representations as to the accuracy or completeness of the information contained in these materials and disclaims any responsibility or liability to anyone who may rely on it.

HIPAA Privacy and Security Rules

If your entity is required to comply with HIPAA Privacy and Security Rules, there may be additional considerations that may be taken to maintain compliance with HIPAA. Check with your legal counsel or privacy officer for guidance.

Methods

Staff from the Bureau of Communicable Diseases reviewed 11 policies from local health departments and community-based organizations. Of the policies reviewed, six focused specifically on texting, three focused on cell phones, one focused on communication with clients more broadly, and one focused on information technology usage. Bureau staff also examined toolkits from the Centers for Disease Control and Prevention (CDC) and Public Health Seattle & King County.

Policies from the following agencies were reviewed:

- AIDS Resource Center of Wisconsin
- Brown County
- Calumet County

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[1] PewResearch.org

- Fond du Lac County
- Manitowoc County
- Public Health Madison Dane County
- Public Health Seattle & King County
- Sixteenth Street Community Health Centers (both agency and department policies)
- Waushara County
- Winnebago County

Confidentiality and Risks of Text Messaging

Confidentiality is of the utmost importance. Sending a text message carries the same risks as leaving a voicemail on a home answering machine or a public health letter at a client's residence. Just as a letter or voicemail message can be read or listened to by someone other than the intended recipient, text messages can also be sent to or read by others. It is important to remember that text messages can be copied, forwarded to others, altered, or stored electronically without authorization or detection.

Keep in mind that text messaging is not a secure method of communication. Be sure that no confidential information is ever transmitted via text message. No personally identifiable health information should be included in text messages. ("This is information that relates to the past, present, or future physical or mental health or condition of an individual; the provision of health care to an individual; … that identifies the individual; or with respect to which there is a reasonable basis to believe the information can be used to identify the individual.")

Programs can minimize these risks by taking the following key suggested precautions. This is not a comprehensive list.

- Check with your legal counsel or privacy officer for guidance/policy on texting or communicating with clients using different modes.
- If possible, before contacting a client, obtain consent on the best way to communicate to the client (i.e., text, email, voicemail).
- Do not use personal phones or portable devices to send messages.
- If you are using text messaging to confirm an appointment time or meeting location or to inform the client of a missed appointment, you must first obtain the client's written consent unless the text is sent as part of a disease intervention specialist (DIS) case investigation.
- Caution must be taken to ensure that staff has the correct phone number and that the correct number is being used for texting.
- If the individual responds with a text message, respond with another text message asking the individual to call you.
- Texts should never be used to provide any kind of health or partner information. They can be used to set up appointments or to request a return phone call. Send texts only to the wireless telephone number provided by the individual.
- Texts may be limited in character count. For example, a text message over 160 characters may be split into two messages. Text messages should be concise and contain 160 characters or fewer.

II. POLICY PURPOSE STATEMENT

Policy Purpose Description	Example Language from Policies Reviewed	Source
The formal policies generally start with a statement of purpose. Most state that the policy's purpose is to establish guidance on text messaging in order to improve communication with clients. Some state the larger goal of improving the health of clients.	ARCW recognizes that the identity of and information regarding clients and program participants is required to be kept confidential pursuant to HIPAA regulations and other Federal and Wisconsin State Standards, specifically Sections 252.15 and 146.82 of the Wisconsin statutes. The following procedures are meant to attempt to prevent even unintentional breaches of confidentiality while communicating with our clients. It is important to remember that even a client's family, partner, friends or spouse may not know of the client's HIV status and that a breach of confidentiality may be detrimental to a client. In addition, this policy is to provide guidance to Social Services staff regarding best practices for communicating with clients and maintaining good boundaries.	ARCW Communicating with Clients Policy
	The purpose of this policy is to establish guidance on short message service (SMS) text messaging by members of the Public Health – Seattle & King County (PHSKC) workforce in order to protect and promote health of individuals and the community, while balancing risks to individuals and the department. The policy provides procedures for assessing risk and value of a program's SMS plan, and steps to assure appropriate procedures are followed.	Public Health Seattle & King County SMS Text Messaging Policy
	The purpose of this document is to establish guidance on text messaging by members of Calumet County Public Health workforce and address security risks and procedural issues presented by text messaging.	Calumet County Text Messaging Policy
	To improve communication with clients that are difficult to reach via telephone, in person or by sending a letter.	Manitowoc County SMS Text Policy
	Text messaging clients for the purpose of health information and health reminders will facilitate efficient and effective communication.	Waushara County Text Messaging Policy
	This text messaging policy has been established to facilitate efficient and effective communication with clients, health department staff and community stakeholders. Text messaging gives clients a portable, convenient and alternative method for communication that may be preferred.	Winnebago County Text Messaging Policy

III. DEFINITIONS

Definitions of key terms used throughout the policy. These generally include terms specific to text messaging technology as well as definitions of the people and groups covered in the policy.

Term	Definition	Source
Client	A member of the public who presents for health care (mental or physical) including minors and adults receiving health care, social services, dental services and other health care services from [AGENCY] care sites and/or programs. Clients include deceased persons who have received care.	Public Health Seattle & King County SMS Text Messaging Policy
County files	Files, data, documents, images, video, audio, scans, information, programs, faxes, email and other electronic communications created, stored, transmitted or accessed through County operations.	Brown County Information Technology Usage
County workforce members	Refers to, but is not limited to, employees, temporary or contracted staff, contractors, consultants, volunteers, personnel affiliated with third parties, and any other individual or entity using information systems owned, operated or leased by Brown County. Workforce members also include anyone performing County business on any other system. Further, a County workforce member includes anyone using networked services such as County managed or County registered email or core applications, including employees and contractors whose work is directed by the County.	Brown County Information Technology Usage
Electronic communication	E-mail, phone texting (SMS), faxing, instant messaging, social media communications and any other electronic communication.	Brown County Information Technology Usage
HIPAA	Health Insurance Portability and Accountability Act	
Information systems	Any computer hardware or other related equipment, operating system, application, software, network, wireless, web tool, storage media, internet browser, email or FTP (File Transfer Protocol) used to send and receive files across the internet, telephone, smartphone, camera, cell phone, pager or other electronic device provided by Brown County for use by the County workforce. Systems also extend to authorized personal devices such as smartphones or wearable smart devices that are used for County business (this includes accessing County Files or running County owned software/applications on a device not owned by the County).	Brown County Information Technology Usage
MMS (Multimedia messaging service)	Similar to SMS but permits sharing of images on smartphones. It is a type of instant messaging.	Brown County Information Technology Usage

III. DEFINITIONS continued

Term	Definition	Source
PHI (Protected health information)	Any information about health status, provision of health care, or payment for health care that is created or collected by a Covered Entity (or a Business Associate of a Covered Entity), and can be linked to a specific individual.	
	Individually identifiable health information in any form whether oral, written or electronic. Individually identifiable health information refers to information that: • Relates to the individual's past, present or future physical or mental health or condition; the provision of health care to the individual; or the past, present, or future payment for the provision of health care to the individual. • Identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual.	Public Health Seattle & King County SMS Text Messaging Policy
Public	Individuals who can opt in to receive general educational health promotion and prevention messages.	Public Health Seattle & King County SMS Text Messaging Policy
Short codes (numbers)	Five or six digit special telephone numbers used for sending SMS messages.	Public Health Seattle & King County SMS Text Messaging Policy
SMS (Short message service or text messaging)	The sending of 160 character messages over a cell phone or through a web-based interface to one or more cellphone recipients.	Public Health Seattle & King County SMS Text Messaging Policy
	Short Message Service, also referred to as texting. This is a widely used service available on most smartphones. It is a type of instant messaging.	Brown County Information Technology Usage
SMS vendor	A company that provides a web-based interface to store contact lists and manage the flow of messages from the sender to the cellular phone carriers.	Public Health Seattle & King County SMS Text Messaging Policy
Text message	A 160-character message sent over a cell phone or through a web-based interface to one or more cellphone recipients.	Waushara County Text Messaging Policy

A. Security & Confidentiality

Policy Item Description	Example Language from Policies Reviewed	Source
Consent Some policies require formal, documented consent from clients prior to texting.	Clients who choose text messaging as a means of communication with the department staff are informed about the lack of security of text messages to the end user and provided the "Text Messaging Informed Consent Form" for signature prior to initiating text message communications. The form is filed in the client's health record. If the client has limited English proficiency a consent form should be provided in a language the client can thoroughly understand and/or a translator should be used. If the client has limited literacy a thorough verbal explanation of the risks should be given.	Waushara County Text Messaging Policy
	When calling clients/patients of the clinic, staff must receive consent from said client/patient prior to initiating cell/text communication.	Sixteenth Street Community Health Centers HIV Cell Phones Procedure
	When calling clients/patients of the clinic, staff must receive consent from said client/patient prior to initiating cell/text communication.	Public Health Seattle & King County SMS Text Messaging Policy
Exceptions to Consent Some policies allow texting to be used to contact a client prior to consent in order to follow up on a disease diagnosis or exposure if there have been multiple, documented, unsuccessful attempts to contact the client by other means (e.g., phone, mail).	Initiating contact through texting, prior to consent being signed, is allowed if there are documented unsuccessful attempts to reach client by phone. Limit text to name, department, and phone number to call.	Waushara County Text Messaging Policy
	If you are using text messaging to confirm an appointment time or meeting location or to inform the client of a missed appointment, you must first obtain the client's written consent unless as part of a DIS case investigation.	CDC Toolkit: Introducing Technology into Partner Services – example from Multnomah County
Confidentiality Measures Correct number	Caution must be taken to ensure that staff have the correct phone number and that the correct number is being used for texting.	CDC Toolkit: Introducing Technology into Partner Services – example from Multnomah County

Policy Item Description	Example Language from Policies Reviewed	Source
Confidentiality Measures Broad language Use work device to text Password protection Private space	Broad partner notification language should be used, i.e., "important health matter." Sending disease specific information via text message is not recommended. Text messages should only be sent from a work phone or computer. We do not recommend the use of personal cell phones or computers when communicating with clients or their partner(s). All mobile devices should be password protected [and encrypted]. Text messages should be sent from a private space.	CDC Toolkit: Introducing Technology into Partner Services
Confidentiality Measures Security program	Assure that all mobile devices have installed Maas360 or other IT approved security program.	Public Health Seattle & King County SMS Text Messaging Policy
Confidentiality Measures PHI Client identifiers Secure device	Text messages must not contain protected health information (PHI). Limit or exclude, where possible, client identifiers when sending a text message. Never use first and last name in a text message. Assure mobile device used to send text messages is secure at all times, including after work and at home.	Calumet County Text Messaging Policy
Confidentiality Measures Verify caller	As the individual returns the call, all efforts should be made to verify that it is the person you are trying to reach. For example – DOB, address.	Winnebago County Text Messaging Policy
Confidentiality Measures Loss of phone Confidentiality breaches	Per IT policy, if the agency cell phone is lost or stolen, the case manager must report the loss immediately to [agency's] IT Department and to their immediate supervisor. Breaches of confidentiality in communicating with clients may lead to legal action and result in civil and/or criminal penalties. If there is a breach of confidentiality while communicating with clients, staff will report all breaches immediately to [list staff to be contacted].	ARCW Communicating with Clients Policy

Policy Item Description	Example Language from Policies Reviewed	Source
Phone lock screen	Case management staff will disable text message notifications appearing on the phone's lock screen, which will allow for better protection of another person seeing client's text messages on the case manager's phone.	
Storing client information in phone	Any client phone numbers saved in the agency cell phone should only be identified by the most minimal information needed, such as client's initials only, first name only, or first name and last name initial. Client's full first and full last name should not be stored in the cell phone.	
Confidentiality Measures Returning phones	Staff must return work cell phones when their work relationship at [agency] ends.	Sixteenth Street Community Health Centers HIV Cell Phones Procedure
Responding to Client Texts Containing PHI	Clients must be informed to never send protected health information (PHI) to the DIS via text messaging. If a client does send PHI via text messaging to the DIS, the message must immediately be transcribed and then immediately deleted from the phone or smart device. Copies of other text messages sent or received should be retained in the mobile device and/or email account during the investigation and deleted upon case closure.	CDC Toolkit: Introducing Technology into Partner Services – example from North Carolina
	If a client responds to a text message with information that contains PHI, such as a description of their medical condition, do not respond to the original text. Instead, send a new text message that requests the patient call you.	Calumet County Text Messaging Policy
Risks and Considerations Risks of sending text messages	Standard SMS text messages are not encrypted so messages can be received and/or altered by unintended recipients. All text messages sent to clients contain protected health information, because the client's phone number is an identifier. Therefore, texting clients presents a potential risk to the patient and liability to Public Health in the event of a breach. The adverse impacts resulting from a breach can be measured on a scale of high, moderate, and low. Program staff should aim to send text messages that present the lowest possible risk while accomplishing the goals of the program.	Public Health Seattle & King County SMS Text Messaging Policy

Policy Item Description	Example Language from Policies Reviewed	Source
Risks associated with sending unencrypted text messages	Breach of HIPAA: Unauthorized disclosure of PHI through SMS text messaging could constitute a breach under the HIPAA Privacy Rule, triggering mandated notifications of clients, damage to Public Health's reputation, mandated reporting to Health and Human Services, a possible Office of Civil Rights investigation and sanctions.	
No sender/recipient authentication	Senders cannot authenticate recipients nor can recipients authenticate senders. No matter how much care is taken the sender cannot be certain that the individual they wish to contact is in possession of the mobile device for which they have the number. Recipients are unable to validate that the text message actually originated with Public Health. Should they choose to call there is no assurance that the recipient is actually talking to a Department of Health employee.	
Wireless carrier infrastructure risk/using personal devices/unauthorized access	ePHI sent via SMS text message can end up being stored and remain stored on wireless carrier servers. As such, a breach of the telecommunications carrier servers could allow unauthorized individuals – both wireless carrier staff and external individuals – to access or view the ePHI. Client PHI can be improperly accessed, including but not limited to, theft/loss of the client's device, inadequate client passwords and client information viewed by third parties.	
Compliance Monitoring Compliance checks can be implemented to ensure staff are following the protocol and using appropriate language for texting.	It is imperative that this protocol is followed closely and all texts sent to clients follow the specified language verbatim. Failure to do so could lead to a HIPAA breach and subsequent fines. STI team leadership and the HIPAA Privacy Officer will be doing unannounced compliance checks periodically.	Public Health Madison Dane County STI Team Text Protocol

B. Incorporating Texting into STI Follow-Up

Policy Item Description	Example Language from Policies Reviewed	Source
Texting Purpose Many policies specify that the purpose of texting is to engage the client in a phone call or meeting. Some policies only allow texting for clients who do not respond to other methods of contact (e.g., phone calls and/or field visits).	The goal of text messaging by DIS is to enable the DIS to expedite contact with a client to schedule a time/date to meet. Text messaging is particularly applicable in situations where a client or partner is not responding to traditional means of follow-up e.g. phone calls and/or field visits. Text messages should be utilized after attempts to contact the client by phone have failed. DIS should then send the standard Public Health text to the client to encourage them to call back. If there is no response to the text message within 1 hour of sending, DIS should attempt a field visit for clients with a documented address. Text messages should be sent to clients, their partner(s), or members of their social network only during the course of a public health investigation and when clients have failed to respond to phone calls, when locating information is unknown, or when the client and/or partner states that texting is the preferred method of communication.	[CDC Toolkit: Introducing Technology into Partner Services](#) – example from North Carolina

Situations in which health departments allow communication via text (more details below)
Before texting a client, you should ask the client about their communication preferences and obtain a signed consent form that indicates their preferred method. Many policies specify the situations in which texts may be used to communicate with clients, such as:
 	
- Appointment/meeting scheduling and reminders
- Communicable disease investigation control
  o Partner follow up
  o STI testing results (to contact only, not to deliver results)
- Brief informative/educational messages to clients (not covered in this document)
	Examples of communications staff may conduct via text messaging per consent, include:
	  i. Appointment/meeting scheduling and reminders "Appointment Reminder for [Insert Date and Time]. DO NOT TEXT BACK. Call XXX-XXX-XXXX for appointment changes."
	  ii. Return call requests to clients for purposes such as communicable disease investigation control
	  iii. Brief informative/educational messages to clients
	  iv. Public information message exchanges with department staff or community stakeholders regarding public health concerns services such as data, clinic logistics, need to call in to the office for new information, etc.
		Waushara County Text Messaging Policy

IV. POLICIES continued

Policy Item Description	Example Language from Policies Reviewed	Source
Texting for STI follow-up on reported case/Partner Services/DIS Policies generally require that attempts are made to contact partner using other forms of communication before texting.	Full f/u patients: 3 attempts total in the following order 1. Phone call*/Leave voicemail** 2. Phone call/Leave voicemail OR Text - Approved text language in Appendix A 3. Phone call/Leave voicemail OR Text – Approved text language in Appendix A *If no phone # send letter in the mail **If voicemail is full/not set up/non-existent, send text right away. Abbreviated follow-up patients (Females over X age): 1 attempt 1. Send Text* – Approved text language in Appendix A *If no phone number, send a letter in the mail.	Public Health Madison Dane County STI Team Text Protocol
STI Clinic Reminder Texts Sending texts to remind clients to make appointments may require signed consent depending on policy.	If you are using text messaging to confirm an appointment time or meeting location or to inform the client of a missed appointment, you must first obtain the client's written consent unless as part of a DIS case investigation.	CDC Toolkit: Introducing Technology into Partner Services – example from Multnomah County

STI Clinic Results Texts
Texts may be used to make contact with client but not to deliver results.
	Voicemail is the primary way to give test results. Ask client details about their voicemail regarding confidentiality of their voicemail, is it set up and can they access their messages. If voicemail is not an option, approved text messages can be used to try and make contact with the person (not to give test results).
	
	Results will be given to client once they are all complete unless there is a positive result. If clients want a specific test result before they are complete they can call the STI line after 3 business days.
	
	Until an alternative STI follow-up line is available, results texts will be sent from the team phone requesting the client to call that phone back. This phone will be in possession of the results nurse for that given day and passed to the next RN at completion of shift.
	    A. When all results are negative: 2 texts total will be sent asking the client to call back (see example language below).
	    B. When a result is positive: 3 texts total will be sent asking the client to call back (see example language below).
		Public Health Madison Dane County STI Team Text Protocol

Policy Item Description	Example Language from Policies Reviewed	Source
Responding to Client Texts Responses to client texts should encourage client to call. Sensitive information should not be provided via text. Do not respond directly to client texts that contain PHI.	If a client responds to your text message with another text message instead of calling, use an approved message to encourage the client to call you. Never respond to a text message from an individual that contains PHI. Instead, send a new text message to encourage the individual to call you. When you are unsure how to respond to a text message, ask your supervisor or manager for guidance. Managers and supervisors are responsible for insuring that staff understand the proper use of text messaging.	Public Health Madison Dane County STI Team Text Protocol
	If a client responds to your text message with another text message instead of calling, use an approved message to encourage the client to call you.	CDC Toolkit: Introducing Technology into Partner Services
Permissible Information via Text CDC and some counties outline information that can be included in a text message.	- Your name - Your county phone number – as long as it is not known to the public as an "STD phone number" - Statement that identifies you are from XX County - Request for client to call you - Client's appointment time (no consent if for partner services) - Appointment location (no consent if for partner services) - Missed appointment reminder (no consent if for partner services) - Individualized health promotion information (as long as a specific health condition is not included or cannot be inferred.)	CDC Toolkit: Introducing Technology into Partner Services & Calumet County Text Messaging Policy
Prohibited Information via Text CDC and some counties outline information that cannot be included in a text message.	- Protected Health Information (PHI) (except client phone number which is PHI) - Client first and last name - Information that identifies you as a health care provider or specialist - Client referral information - Clinic name if it denotes a specific health condition (e.g., "STD Clinic" or "TB Clinic") - Specific health service or condition	CDC Toolkit: Introducing Technology into Partner Services & Calumet County Text Messaging Policy
Example Language Standard general message	This is (PHN first name) from the [County Name] Co. Health Dept. I have been trying to reach you. Please call me at ###-###-#### OR reply with a date/time/number to reach you.	Manitowoc County SMS Text Policy

Policy Item Description	Example Language from Policies Reviewed	Source
Example Language STI follow up/partner services/DIS	I am Jane Doe with [County Name] County and I need to speak with you. Please call me as soon as possible at ###-###-####. I am with [County Name] County and I have important information regarding your personal health. Please call me as soon as possible at ###-###-####. I am with [County Name] County and I have information regarding an urgent health matter. Please call me at ###-###-####. I have made numerous attempts to contact you. It is very important that we talk. Please call me at ###-###-####.	CDC Toolkit: Introducing Technology into Partner Services
Example Language Responding to client texts	I am not able to give you specific information in a text message. Please call me at ###-###-#### I can tell you more when you call. Please call me at ###-###-#### This is urgent and needs your immediate attention. Please call me at ###-###-#### The information I have for you is confidential. I can tell you more when you call. Please call me at ###-###-####. For unsolicited messages: Respond to the incoming messages with a message such as: "Please avoid these types of messages. As I cannot respond to you by text. Please call me at _____. Thank you."	CDC Toolkit: Introducing Technology into Partner Services
Example Language Appointment reminders Before sending an appointment reminder via text, you should ask the client about their communication preferences and obtain a signed consent form that indicates their preferred method for receiving reminders.	Your appointment with Jane Doe is at 3:00 p.m. today, call me if you have any questions Juan Doe ###-###-#### Your appointment with Jane Doe is at 3:00 p.m. today at 92nd and Powell, call me if you have any questions Juan Doe ###-###-#### You missed your appointment. Please call ###-###-#### to reschedule.	CDC Toolkit: Introducing Technology into Partner Services
	You have an appointment tomorrow with [Name] Public Health tomorrow at 10.	Public Health Seattle & King County SMS Text Messaging Policy

Policy Item Description	Example Language from Policies Reviewed	Source
	This is [first name], a public health nurse. Is tomorrow at 10 still going to work for you?	

Example Language Negative STI test results	2 texts total:
	1. Hi this is [first name] from public health, please call ###-###-####
	   a. Spanish: Hola, soy [first name] de Salud Pública, por favor llame al ###-###-####.
	2. Hi this is [first name] from public health, please call ###-###-#### about health information.
	   a. Spanish: Hola, soy [first name] de Salud Pública, por favor llame al ###-###-#### sobre un asunto de salud.
		Public Health Madison Dane County STI Team Text Protocol

Example Language Positive STI test results	3 texts total:
	1. I am [first name] with Public Health and I need to speak with you. Please call me as soon as possible at ###-###-####.
	   a. Spanish: Hola, soy [first name] de Salud Pública y necesito hablar con usted. Por favor llámeme al ###-###-#### lo antes posible.
	2. I am [first name] with Public Health and I have important information regarding a health matter. Please call me as soon as possible at ###-###-####
	   a. Spanish: Hola, soy [first name] de Salud Pública y tengo una información importante sobre un asunto de salud. Por favor llámeme al ###-###-#### lo antes posible.
	3. I am [first name] with Public Health and I have information regarding an urgent health matter. Please call me at ###-###-####. (*Acceptable to use "urgent" in this final text if the client is untreated for their STI)
	   a. Spanish: Hola, soy [first name] de Salud Pública y tengo una información sobre un asunto de salud urgente. Por favor llámeme al ###-###-####.
		Public Health Madison Dane County STI Team Text Protocol – from CDC approved language

Policy Item Description	Example Language from Policies Reviewed	Source
Texting Etiquette Many policies provide guidance on texting etiquette. Some policies only allow staff to send texts using approved language verbatim.	- Be professional at all times. Avoid the use of abbreviations, jargon, acronyms, or images. - Be timely in your response to returned texts. Returned texts can come at any time of the day. Be prepared to respond within a reasonable time frame. - Recognize that it is extremely difficult to discern tone in text messages. It is very hard to discern humor, sarcasm, etc. from a text. - Know that some users may not have a text messaging plan and that each incoming and outgoing text may cost them money. - Texts may be limited in character count. For example, a text message over 160 characters may be split into two messages. - If, after making contact with a patient or partner, you would like to text to confirm an appointment or meeting time, it is important to obtain the person's permission.	CDC Toolkit: Introducing Technology into Partner Services
	- All messages should be as professional as possible and spelled correctly. Avoid abbreviations and acronyms. Remember that you are sending a message on behalf of [agency] and all your communications should reflect professionalism. Do not send smiley faces, symbols, or use SMS or multimedia message service (MMS) to send photos or other media. - Text messaging is a rapid means of communication and timely response should be anticipated. Be prepared to respond immediately.	CDC Toolkit: Introducing Technology into Partner Services – example from North Carolina

C. Documentation

Policy Item Description	Example Language from Policies Reviewed	Source
Documenting Text Messages Many policies require text messages to be documented and stored according to record retention requirements.	Texts should be documented in the client record in the same way verbal telephone communications and voicemail messages are. They don't need to be documented verbatim but the substantive parts, next steps, etc. should be captured. If a client comment is important, it can be included in quotes in the documentation.	Communication with AIDS Resource Center of Wisconsin and Public Health Seattle & King County
	All communication/interaction should be documented in detail on the appropriate forms and retained in the investigation case file.	CDC Toolkit: Introducing Technology into Partner Services
	All text messages sent or received will be documented and stored in accordance with medical record and record retention requirements.	Public Health Seattle & King County SMS Text Messaging Policy
	If SMS is used as part of patient care, public notification or other Public Records Request (PRR) applicable communications, the phone #, person's name, the text, date, image and time must be recorded in the patient record or other system of record. In most cases, this means manually adding the information to the system of record.	Brown County Information Technology Usage
	- Text messages sent to contact an individual must be documented in the client's/contact's record via the STD Database. - Text messages sent to remind a client of an appointment time or location must be documented in the client's record via the STD Database. - Text messages sent to inform a client that he/she missed an appointment must be documented in the client's record via the STD Database. - Text messages sent from a client with PHI must be documented in the client's record. - Document all text attempts and results in STD Database.	CDC Toolkit: Introducing Technology into Partner Services – example from Multnomah County
	1. Text message communications and client responses are documented in the client's clinical record in the same manner as verbal telephone communications and voicemail messages. 2. Text messages are retained on the cell phone until documented and/or the cases are closed, and then are deleted. 3. Text messages are retained in the WCHD Google Voice accounts as documentation that can be searched.	Winnebago County Text Messaging Policy

Policy Item Description	Example Language from Policies Reviewed	Source
	4. If HIPAA relevant content is shared outside of normal texting venues (e.g. Facebook Messenger), document the content (screenshot) before deleting the security sensitive information from the online media portal. Make sure this information is forwarded to the appropriate staff and saved appropriately. 5. If messaging needs to be altered/removed, there should be appropriate documentation (screenshot).	
Deleting Texts Many policies provide guidance on deleting text messages with clients.	Do not erase any text messages, the messages will be stored by [county name] in accordance with record retention requirements.	CDC Toolkit: Introducing Technology into Partner Services – example from Multnomah County
	Clients must be informed to never send protected health information (PHI) to the DIS via text messaging. If a client does send PHI via text messaging to the DIS, the message must immediately be transcribed and then immediately deleted from the phone or smart device. Copies of other text messages sent or received should be retained in the mobile device and/or email account during the investigation and deleted upon case closure.	CDC Toolkit: Introducing Technology into Partner Services
	Identify a clear plan for removing text messages from county phones or web-based interface systems. Document removal plan in the SMS Plan. Delete text messages after communication is completed and necessary information is recorded.	Public Health Seattle & King County SMS Text Messaging Policy
	Text messages sent will be documented in department records and deleted in Google Voice after necessary information is recorded.	Manitowoc County SMS Text Policy
Documenting Documents through Photographs on Phone This may not be applicable for STI follow-up that does not include ongoing case management.	With clients' written permission, case managers can use a work phone to take pictures of client's verification documents (paychecks, insurance, identification, etc.) for the client's file. Case Managers should not store protected patient information or documents on the work cell phone. Documents should be uploaded to [agency specific location] by the next business day and then deleted from the phone. To upload photos of client's verification documents into [agency specific location]: a. Save picture in the phone's photos. b. Select photo(s) to be emailed and then click on the "Mail" icon. c. Enter your work email address into the "to" line and then click "send." d. Once received in your email inbox, delete photo(s) from the agency cell phone. e. Save documents from email inbox to [agency specific location].	ARCW Communicating with Clients Policy

IV. POLICIES continued

Policy Item Description	Example Language from Policies Reviewed	Source
Documentation in Wisconsin Electronic Disease Surveillance System (WEDSS) Only one policy reviewed specifically mentioned WEDSS. It said to document the text in the Investigation tab under Attempts to Contact.	Documentation of the text to and from a WEDSS patient shall be completed in the Investigation tab under Attempts to Contact. All text message sent and received will be stored in WEDSS and SPHERE accordance to record retention requirements.	Manitowoc County SMS Text Policy
Documentation in Secure Public Health Electronic Record Environment (SPHERE) Only one policy reviewed specifically mentioned SPHERE. It said to document the text in the Activity Notes.	SPHERE documentation should be logged in the Activity Notes. All text message sent and received will be stored in WEDSS and SHPERE accordance to record retention requirements.	Manitowoc County SMS Text Policy

D. Appropriate Phone Use

Policy Item Description	Example Language from Policies Reviewed	Source
Using Cell Phones for Work vs. Personal Use Some policies explicitly state that work phones may only be used for work purposes.	Agency cell phones will be utilized for work purposes only. If a phone with data is allocated, the data must be used for work purposes and not for personal use.	Sixteenth Street Community Health Centers Agency Cell Phone Allocation Policy
	County-provided cell phones are to be used for business purposes only. This includes communication with clients, medical providers and other community individuals or business resources necessary in the care of the public. Cell phones are not confidential and a subpoena of cell phone records can be issued in a court of law. The use of client names shall be limited as much as possible.	Fond du Lac County Cell Phone Policy
Some policies require reimbursement for any non-work-related calls made on the work cell phone.	Monthly phone bills will be monitored by Department Manager, and [agency name] will require reimbursement for any non-work-related calls.	Sixteenth Street Community Health Centers HIV Cell Phones Procedure
Some policies allow for limited personal use of agency technology. (Note the example language to the right was from a broad information technology policy, not a cell-phone specific policy.)	County Workforce Members are permitted "Limited Personal Use" of services such as email, phone and internet. However, personal use of County services cannot interfere with County operations and must comply with all Federal, State and Local laws, rules and regulations. Personal use cannot be disruptive, create risk, create more than nominal cost for the County, negatively reflect on the County, reduce productivity, or interfere with department and/or County operations. Use of County resources for personal economic gain or commercial purposes is prohibited and in many cases is illegal. Any "Limited Personal Use" involving County systems, whether during the workday or afterwards, must be done in a professional and appropriate manner, including language and content. Limited personal use is subject to approval by each Department Head or designee.	Brown County Information Technology Usage

Policy Item Description	Example Language from Policies Reviewed	Source
Use of Personal Cell Phone Risks to Consider	• Camera: Pictures of PHI are most likely not protected properly. If a picture contains enough information to identify a specific individual, then it is PHI. • Transmitting data via text or email over an unsecured Wi-Fi network: Don't use complimentary Wi-Fi on your phone to check work emails, etc. Depending on how the connection was established, it may be not be encrypted. • Your contact list: Do not store patient contact list on your personal phone. If you store patients as contacts, you will also have to ban every other app from accessing the list because many apps leverage your phone book as a way of improving your (and their) social network. • Physical loss or theft of the device: Phones can be easily stolen. Assume your phone can be stolen at any time. Make it a policy to turn on encryption, passwords, and other technical features whenever you can. • The cloud: Mobile devices tend to default to using "cloud' technologies and this is dangerous if you are subject to HIPAA. Many cloud services do not have the security that is acceptable for HIPAA purposes, and even if they did, you likely don't have a signed business associate agreement in place if subject to HIPAA. • Using an outdated operating system. • Sharing your mobile device with others and inadvertently exposing PHI.	Wisconsin Department of Health Services
Best Practices in Securing Your Cell Phone Check with your security officer for guidance.	• Use a device key, password, or other user authentication. • Install and/or enable encryption. • App sign-in: Apps that contain PHI should not be set to automatically log in. They should require an additional password or access key (e.g., a fingerprint). • Idle-state protection: The device should be set to automatically log out or lock, if left idle for a period of time. • Install and activate remote wiping and/or remote disabling. A remote device wipe allows you to move all data from the device in the event that it is lost or stolen. • Disable and do not install or use file-sharing applications. Use of file-sharing software, such as Dropbox, should be carefully reviewed. These types of software allow you to copy information from applications like email directly to the software cloud provider.	Wisconsin Department of Health Services

Policy Item Description	Example Language from Policies Reviewed	Source
Data Use Some policies state that cell phone data will be monitored and may be limited.	If a phone with data is allocated, the organization will monitor data use and may limit the amount of data use	Sixteenth Street Community Health Centers Agency Cell Phone Allocation Policy
Availability via Cell Phone Some policies state expectations around when staff should have their work phones with them and be available/reachable on their phones.	To assist in Case Manager's safety while away from the office during the day, Case Managers are expected to bring their agency cell phone with them when out in the community or at a home visit. It is not the expectation by staff or clients that case managers are available by their agency cell phone in evenings and on weekends. In order to maintain good boundaries with clients and colleagues: • Case Managers are strongly encouraged to leave their agency phone at work in evenings and on weekends. • If Case Managers must bring their phone home (i.e.: due to not returning to work after a home visit (HV) or she/he has a HV right away the following morning), case managers are strongly encouraged to silence their phone and not respond to calls or texts in evenings and on the weekends.	ARCW Communicating with Clients Policy
	Cell phone use shall be limited to business hours with the exception of on-call duties.	Fond du Lac County Cell Phone Policy
Cell Phone Use While Driving Several policies explicitly ban texting or cell phone use more generally while driving.	Case Management staff should not text while driving.	ARCW Communicating with Clients Policy
	As a safety precaution, text messaging while driving is prohibited.	Waushara County Text Messaging Policy
	Cell phones may not be used while driving.	Sixteenth Street Community Health Centers Agency Cell Phone Allocation Policy

V. POLICY IMPLEMENTATION

A. Training

Implementation Item Description	Example Language from Policies Reviewed	Source
Staff Training Some policies include a description of the plan to train staff on the policy.	Assure that all staff who will be text messaging clients are trained to the policy and the SMS Plan. Describe training plan in the SMS Plan and how training will be documented.	Public Health Seattle & King County SMS Text Messaging Policy
	Health Division management staff will train employees in this policy. The training will include at least the following: a. Review of all elements of this policy. b. Review of the agency's procedures for implementing the policy, including procedures for sending text messages, retaining text messages, and responding to subscribers or clients who send text messages to the agency. Identification of the person(s) within the agency who are responsible for the policy and to whom questions about the policy should be addressed.	Calumet County Text Messaging Policy

B. Implementation Responsibilities

Implementation Item Description	Example Language from Policies Reviewed	Source
Implementation Responsibilities Policy may lay out who is responsible for each part of implementing the policy.	Communications and Compliance will develop instructions and templates to guide programs in meeting the requirements of this policy. Compliance and Communications are responsible for collaborating and approving SMS Plans. Compliance is also responsible for working with programs on exceptions to the policy and for documenting SMS text messaging exceptions throughout [agency]. Program level supervisors and managers are responsible for ensuring their public health workforce follows text messaging best practices and policies. The Communications Team is responsible for providing guidance to programs on text messaging best practices and for approving, in collaboration with Compliance, SMS Plans. Communications is also responsible for consulting on texting exceptions. The Chief Administrative Officer is responsible consulting with Texting	Public Health Seattle & King County SMS Text Messaging Policy

Implementation Item Description	Example Language from Policies Reviewed	Source
	Sponsors and Department Director in making a decision to approve Exception requests.	
Replacement Costs Policies may outline who is responsible for the costs of replacing a lost or damaged phone.	Each employee is responsible for the cell phone. Employees may be responsible for the replacement costs for lost or damaged phone. This will be determined on a case-by-case basis and dependent on the level of employee negligence.	Sixteenth Street Community Health Centers Agency Cell Phone Allocation Policy

C. Cell Phone Allocation

Implementation Item Description	Example Language from Policies Reviewed	Source
Phone Allocation Some policies specify which positions should get a work cell phone and what capabilities the phone should have for each position.	Cell Phone Eligibility Guidelines: A department may assign a county cell phone to an employee or make one available for employees to sign out when one or more of the following conditions is met (a – e). a) Emergency situation/safety and security considerations: Where it is necessary to provide for, maintain or enhance the personal safety of a department employee in the performance of their duties and responsibilities or to maintain public safety within the community. b) Frequent field work/travel: Where it is cost-effective for the employee to have the ability to communicate through the use of a cell phone, such as when an employee is frequently in the field or is traveling to various work assignments and they are required to have regular contact with other individuals, including communication through texting. c) On-call: Where employees are working in an on-call capacity and must be able to be reached and are required to return a call addressing the request for service at any time while on-call. d) Essential communication: Where it is essential that an employee have the ability to communicate quickly with department personnel, other departments, or outside individuals or organizations on a regular basis in order to receive directions, provide instruction, or obtain necessary and essential information to perform their job functions. e) Remote work locations: Where the employee's work assignment places them in a situation where communication cannot effectively take place other than through the use of a cell phone.	Fond du Lac County Cell Phone Policy

V. POLICY IMPLEMENTATION continued

Implementation Item Description	Example Language from Policies Reviewed	Source
	Cell phones will be allocated to employees based on the following classification. Those employees that will be allocated cell phones include: a. Outreach workers and other employees that enter patient and client homes, for the purpose of ensuring employee safety. These employees will receive phones with call functionality only. b. Employees that move between buildings for work purposes and need access to phone call functionality will receive a cell phone with call functionality only (e.g. both Purchasing positions, Security, Mail). c. Employees that move between buildings for work purposes and need access to organizational applications will receive a cell phone with call and data functionality (IT Manager, Director of Communication, Facilities Manager and Staff). d. Executive Team members who, given organizational need, have need to access email, as well as current news and other information during the course of their day outside the office. Clinical Teams: Phones will be assigned to various clinical teams for the purposed of calls to patients while on-call or while performing other clinical duties (e.g. St. Anthony's Clinic, on-call phones).	Sixteenth Street Community Health Centers Agency Cell Phone Allocation Policy
Cell Phone Sharing In some cases, cell phones may be shared by staff.	If needed, staff will check in and check out a shared cell phone using a cell phone log.	Sixteenth Street Community Health Centers HIV Cell Phones Procedure

D. Evaluation

Implementation Item Description	Example Language from Policies Reviewed	Source
Evaluation Policies may include evaluation of texting for STI follow-up.	All SMS Plans should include an evaluation component. • Process evaluations: e.g., how many text messages are sent, documentation of complaints, requests, etc. • Outcome evaluations: include a measure of effectiveness	Public Health Seattle & King County SMS Text Messaging Policy

VI. ADDITIONAL INFORMATION

A. Resources

1. **SMS Text Messaging Policy Template** – Public Health Seattle & King County
    Link to template available under Implementation and Technology, "Health department texting policy" at http://www.nwcphp.org/docs/sms-toolkit/overview/library.htm

2. **Texting for Public Health: Emergency Communication, Health Promotion, and Beyond** – Public Health Seattle & King County
    Online toolkit developed by Public Health Seattle & King County and the Northwest Center for Public Health Practice at the University of Washington
    http://www.nwcphp.org/docs/sms-toolkit/index.htm

3. **Introducing Technology into Partner Services: A Toolkit for Programs** – CDC
    Toolkit developed by CDC for organizations to use the internet and other digital technologies to trace and contact persons potentially exposed to HIV and STIs. Some of the toolkit is relevant to texting but a lot of it focuses on Internet Partner Services.
    https://www.cdc.gov/std/program/ips/default.htm

    Appendix E – Examples of Text Messaging Policies for Partner Services
    https://www.cdc.gov/std/program/ips/appendix-e.htm

4. **Google Voice Set Up Instructions** – Manitowoc County
    Instructions for setting up a phone number and texting through Google Voice.

B. Cost Considerations

Costs to Implement Texting Program
Public Health Seattle & King County's online toolkit has a page on Costs for a Texting Program: http://www.nwcphp.org/docs/sms-toolkit/planning/budget.htm

Costs to Client
Public Health Seattle & King County's online toolkit has a page on costs to client: http://www.nwcphp.org/docs/sms-toolkit/audience/index.htm

C. Technical

1. **Google Voice**
   a. Google Voice is an application through Google that provides a free phone number for calls, text messages, and voicemail. The application can be used on computers and smartphones.
   b. If using Google Voice for texting, the same policy elements apply including texting etiquette, confidentiality protocols, documentation of messages, and consideration of costs to client.
   c. Manitowoc and Winnebago counties use Google Voice. Manitowoc County has a set of instructions for setting up Google Voice.

2. **Types of Text Messages**
   a. Texts are most commonly sent via SMTP (simple mail transfer protocol) or SMS (short message service) technology.
   b. SMTP routes information by sending emails to cell phone numbers. Messages are delivered free of charge, but they're also less likely to be delivered. To prevent spam, many carriers sometimes do not accept these types of messages.
   c. SMS routes information using wireless networks, via cell phone carriers. Delivery is more reliable, but the end user and the sender also incur a charge. In the U.S., some cell phone companies charge to both send and receive an SMS text message, though this may change in the future.
   d. Source: http://www.nwcphp.org/docs/sms-toolkit/technology/index.htm

3. **Text Message Delivery Confirmation**
   Some cell phone carriers will provide you with an option to receive a text message delivery confirmation. This service, where available, is requested by you through the settings on your cellular phone or through your carrier account preferences.

Policies

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Toolkits

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