

## *Ambulatory Clinic Policy and Procedure*

Title: <b>OUTBOUND MASS COMMUNICATION POLICY</b>	Policy Number: <b>EP 1.26</b>
Regulation Telephone Consumer Protection Act of 1991. Reference: SEC. 227. [47 U.S.C. 227] RESTRICTIONS ON THE USE OF TELEPHONE EQUIPMENT	Effective Date: <b>06/2022</b>

### **Policy Statement:**

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It is the policy of the Texas Tech Physicians of El Paso (TTP-EP) to abide by applicable regulations to legally utilize outbound mass communications.

### **Scope and Distribution:**

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The purpose of this policy is to establish a procedure to manage outbound mass healthcare messages to patients utilizing an artificial or prerecorded voice message over the phone, text messages, and/or e-mails. This policy applies to any outbound mass communication requested by the TTP-EP ambulatory clinics.

### **Definitions:**

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1. Patients with established business relationship: those with a clinical encounter up to 18 months prior to the communication.

### **Procedure:**

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1. **Content:** Healthcare messages are strictly limited to the following purposes:

- Appointment and exam confirmations/reminders
- Wellness checkups – vaccination or preventative information
- Hospital pre-registration instructions
- Pre-operative instructions
- Lab results
- Post-discharge follow-ups meant to prevent readmission
- Prescription notifications
- Home healthcare instructions

Messages must not include any telemarketing, solicitation, advertising, accounting, billing, debt-collection, or other financial content.

2. **Source data:** Healthcare messages must state the name and contact information of the healthcare provider.
3. **Length/duration:** Voice calls must be concise, generally one minute or less and text messages 160 characters or less.



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4. **Recipients:** A healthcare provider may initiate mass outbound healthcare messages with patients that have an established business relationship only.
5. **Frequency:** For voice calls the maximum is of one message per day and three per week. This is computed by individual specialty clinic. Outbound mass voice call campaigns will run on Thursdays and/or Fridays only unless there are exceptional circumstances.
6. **Consent:**
  - Healthcare messages to Residential Landlines can be made without the consent of the called party.
  - Healthcare messages calls or texts to mobile phones only require prior express consent. This consent can be in the form of the recipient providing the mobile number at the time of treatment.
  - Voice calls, texts, and e-mails must be sent only to the phone number or e-mail address provided by the patient.
7. **Opt out option:** recipients will be offered within each message an easy means to opt- out of future contacts, and the-opt out requests must be honored immediately.
8. **Requests:** Require submitting form (see appendix A) to the IMS department with at least a 7 business days’ notice at El Paso Electronic Medical Records- [EIPasoEMR@ttuhsc.edu](mailto:EIPasoEMR@ttuhsc.edu).
9. **The IMS Office** will evaluate the request, extract requested data from EMR database and provide necessary files to assigned IMS team for e-mail or text campaigns, and to communication services team for voice calls (see appendix B) at Customer Support - [CustomerSupport.CommSvc@ttu.edu](mailto:CustomerSupport.CommSvc@ttu.edu).
10. **Communication Services** team will load files and manage campaign according to internal and federal policy and provide requested voice call outbound campaigns reports to contact center.
11. **Opt back in:** Requests by patients to opt back in must be directed to the IMS department for text or e-mail, and to communication services for voice messages using e-mail or EMR internal communications.

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Signatory approval on file by: Juan Figueroa, M.D. Director of Clinical Operations Clinic Medical Directors Committee, Chair Texas Tech Physicians of El Paso	