



AP 3912 Text Communications

References:

Telephone Consumer Protection Act of 1991 (TCPA)

Text messaging is intended to supplement the Rogue Community College (RCC) communications strategy, and this procedure is devoted to the texting medium. Messages intended for the campus community are encouraged to be provided through the institution's designated channels: phone, texting, emergency notifications, email accounts, the college app, and printed materials, such as digital and print signage.

Text messaging guidelines apply to any RCC-affiliated individuals authorized to text individuals and groups regarding college-related matters. Authorized College employees may use text messaging (including SMS and MMS) to communicate essential College information, such as admissions and academic requirements or deadlines, class cancellations, registration or financial aid details, and other time-sensitive matters crucial to student success and college operations.

Text Communications Procedure and Schedule

RCC develops communications procedures and schedules for various relevant audiences. With the multitude of events and initiatives that the College produces, experience has shown that sending communications that promote each event individually ultimately—and counterintuitively—works against successful promotion because metrics have shown that open rates tend to decrease as broadcast communications volume increases.

We follow the schedule to streamline our College communications to maximize open rates and engagement. We ask that event-specific communications continue to be promoted through the main College scheduled messages, focusing on quality over quantity. Text messages should be used in tandem with, or secondary from, College communications. They should not be used too frequently nor as the sole method of communication.

Faculty and staff are strongly discouraged from using their personal phones to text students. Instead, they should use official RCC communication tools and channels to ensure compliance with this procedure and to protect their privacy and that of others.



Definitions

Mass Broadcasted Text Messages: a “pushed” message, often sent to a more extensive, yet segmented, list of subscribers. These will show up as text messages on the user's phone, and they will have the option to reply in the thread.

Direct, One-on-One Text Messages: two-way message thread, often between the department or individual administrator/user in a designated shared inbox or private message thread and the student who subscribed to receive messages.

Emergency Text Messages: One-way notifications sent out to the College community through the College's emergency notification system by RCC Risk Management, or secondarily by the Public Information Officer, via text message to everyone who has enrolled in the system.

TCPA Compliance Guidelines

In alignment with the requirements outlined in the Telephone Consumer Protection Action of 1991 (TCPA), the institution will:

- **Obtain consent:**
 - RCC will not call or send messages to students without their consent.
 - RCC will obtain explicit written permission from students before calling or sending any messages.
- **Provide disclosure:**
 - Once students opt-in to receive messages, RCC will disclose the full scope of their SMS communications and provide a way for them to opt out.

Consent Collection Methods

RCC has established specific methods for obtaining consent, including but not limited to:

- Application or document submissions
- Forms that ask for contact information
- Websites or student portals
- Event registrations
- Appointment scheduling

Each consent collection method should include the following:

- What types of messages the recipient can expect to receive
- An indication of the frequency of messages (no more than five initial or mass broadcast messages per month)
- A place to provide a valid phone number



Failure to comply with these guidelines for text messaging consent collection and/or adherence to resulting requests to opt-out or unsubscribe may result in consequences, including but not limited to the immediate removal of access to the applicable text messaging platform and/or disciplinary action as appropriate.

Text Preference Storage

Individuals opt into texting on an institutional basis. Individuals' preferences (aligned with their opt-in status) to opt in or to opt-out are stored in the College's mass broadcast text messaging application.

Data fields associated with texting preferences should include:

- Contact name and mobile number
- Opt-in status
- Date/time that the status was last updated
- RCC Student ID

Consent-informed Message Limits

The College will send no more than five (5) initial mass broadcast text messages to a single opted-in user per month through RCC's Enterprise Resource Planning (ERP) and Student Information System (SIS). This limit includes all mass broadcast text messages as well as the first message of any direct, one-on-one communication. Once a user responds and/or consents to continue the conversation, any subsequent replies will not count toward this monthly limit.

Administration & Content Guidelines

Employees using RCC communication tools and channels to send text messages must follow all relevant procedures and guidelines. Administrative rights to text messaging accounts are reserved for College employees, and at least two administrators per team/department are required to ensure consistent management. The list of administrators should be reviewed annually. All text messaging accounts must be requested and made accessible to the Communications Module Manager. Official College text messaging accounts are strictly used for College purposes, avoiding personal or private activities. Each department approved to send text messages through RCC's ERP and SIS text messaging platform must appoint at least one authorized official to be responsible for monitoring and approving text messaging requests on behalf of their department to ensure compliance.



Authorized text messaging officials shall abide by the guidelines outlined in RCC's text messaging guidelines, and at a minimum, text messages will:

- Have accurate content
- Use appropriate word choices
- Be sent to appropriate recipients
- Not exceed message maximums
- Include opt-out instructions
- Include no more than 160 characters

Approved Audiences:

Prospective Students

For prospective student communication, permission for text messages must be obtained before a message can be sent. Examples of mediums that could be used to solicit opt-in are included in the Consent Collection Methods section of this procedure.

Staff in the Marketing & Communications, Admissions & Recruitment, Financial Aid, and Athletics departments are typically responsible for texting with prospective students.

Current Students

When enrolled at the institution, students are prompted to opt in or out of institution texting services through the methods listed above in the Consent Collection Methods section of this policy.

Alumni and Donors

Students are asked to update their communication preferences before graduation and again after graduation.

The RCC Foundation will typically be responsible for texting with alumni and donors.

Appropriate Schedule for Text Messages

Text messages should be sent only during designated business hours (e.g., between 8 a.m. and 5 p.m., Monday to Friday) to respect students' time and ensure your team can respond promptly. Exceptions may be approved by the Communications Module Manager, such as auto-generated messages sent to waitlisted students, which may be triggered in real-time when their status changes. As a best practice, any incoming replies to messages should be reviewed and responded to in a timely manner (preferably 24 hours) to provide optimal student support and prevent future messages from being ignored or a student opting out.



Emergency Communications

The Risk Management Department operates RCC's primary emergency notification system, which allows for one-way notifications to all students and employees. This system is separate from RCC's ERP and SIS used for mass and individual communications. As such, receipt of emergency messages is independent of students' opt-in preferences for RCC's ERP and SIS mass communications.

Text messaging through RCC's ERP and SIS platform and phone system should not be used to communicate emergency messages or announcements, except by the Risk Management or Marketing & Communications Departments and in compliance with applicable emergency procedures.

Rescinds: None

Approved: November 1, 2024