

Texting the Public

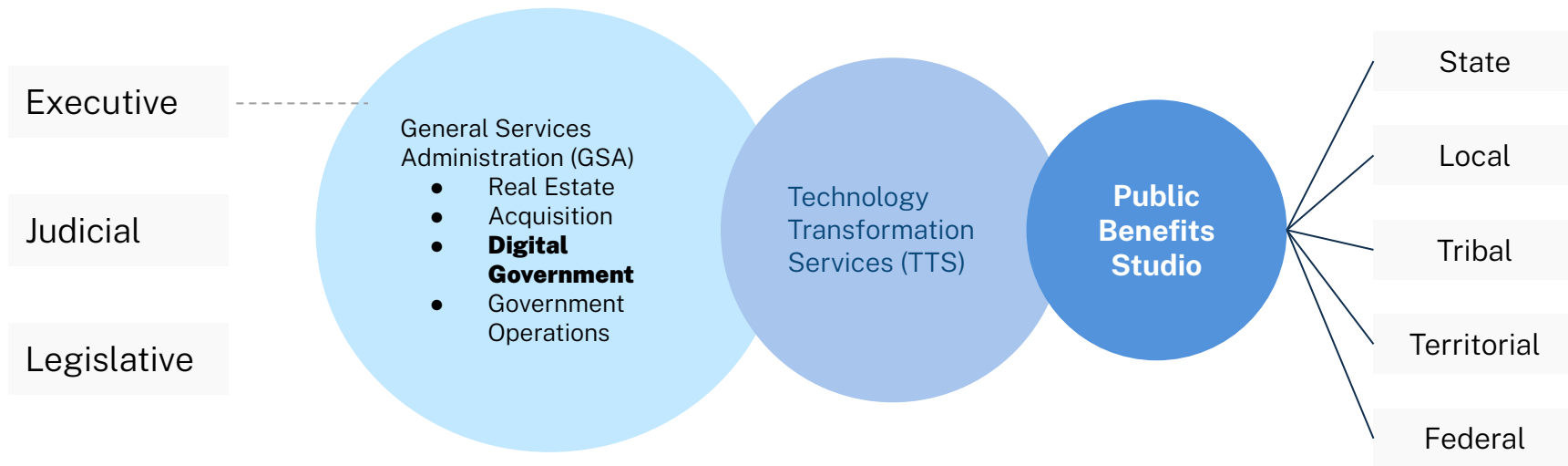


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The Public Benefits Studio is a team of technologists with specialized experience supporting public benefits programs that serve eligible families. The Studio is part of the General Services Administration.

Federal Gov't



The Public Benefits Studio

We're a team of government employees. We collaborate with benefits programs to develop shared technology tools and spread best practices that reduce the burden of navigating government programs for low-income individuals and families.



Why Texting?

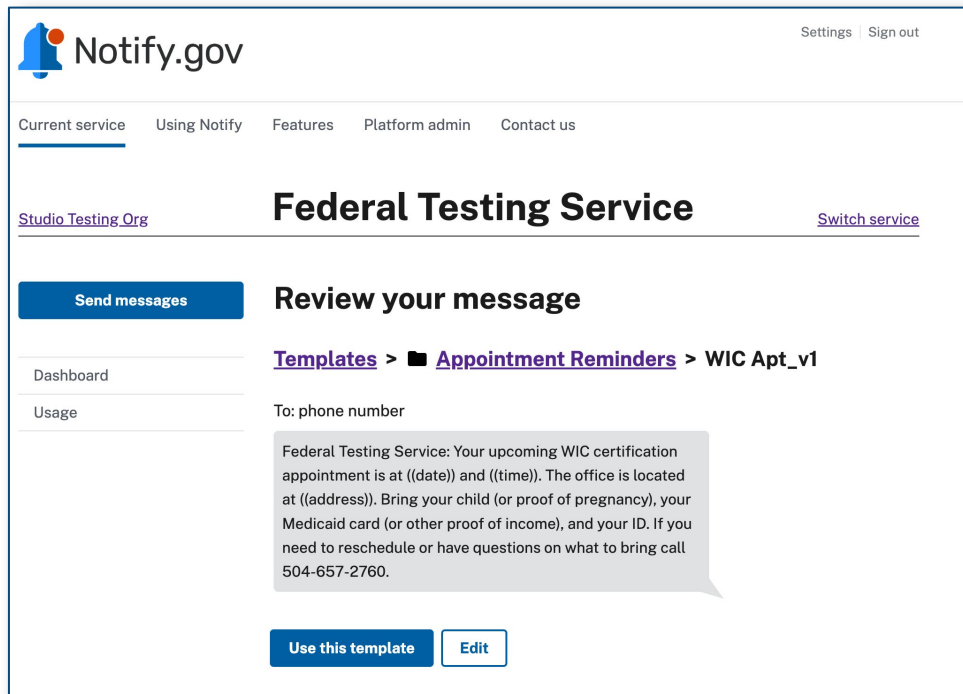
- **Confusing or unreceived notifications** are one of the largest barriers to people getting and keeping benefits
- **97% of adults** earning less than \$30,000 have a cellphone, 85% have a smartphone.
- People are **more likely to read** text messages (at all), and read them sooner, than paper mailings
- Text message notifications have been proven to **decrease re-enrollment churn and save money** for administering agencies
- Texting is a **cheaper way** to reach people, compared to paper mail (about 0.02 cents a message!)



De-risk texting usage with:

Notify.gov

- **Low-risk.** Run a test to prove effectiveness with no financial commitment
- **No procurement.** Pilot your texting program with a no-cost MOU.
- **Nothing to download or install** for staff. Notify.gov is a web-based interface.
- **Federally vetted** for security and privacy considerations.
- **No technical integration needed.*** Upload phone numbers via spreadsheet.
- **10 minutes from account set up to sending** individually customized messages.



**API in development*

Where We're At

Six Pilot Partners

- States
- County
- City
- Federal

**First Messages
Sent to the Public**
November, 2023

New Partnerships

Primary focus on
Benefits Programs

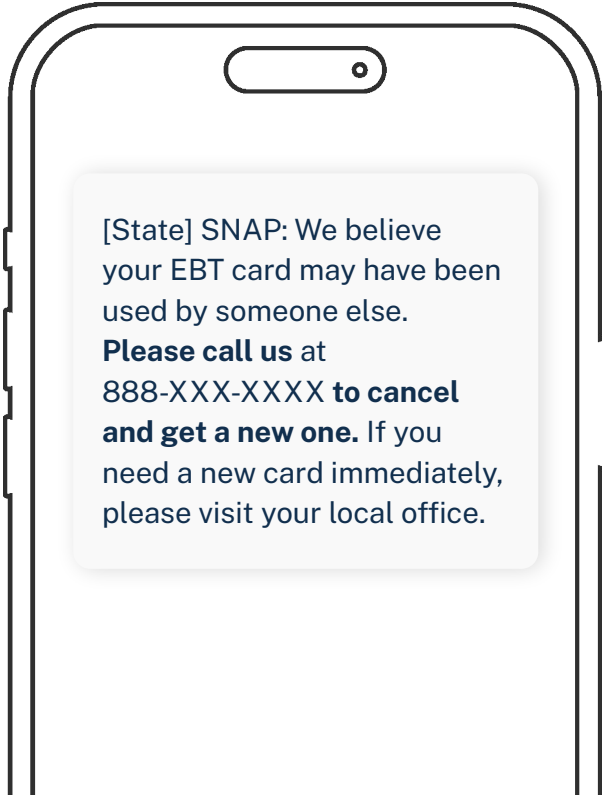
Onboarding as
capacity allows

Text messages work best to **provoke action**:

- Share **timely** information
- Provide critical **status update**
- **Remind** someone to do something

Texting is **not** great for things like:

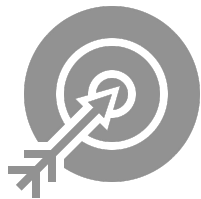
- Detailed instructions (too long)
- Frequent reminders (recipients will start to ignore)



[State] SNAP: We believe your EBT card may have been used by someone else.

Please call us at 888-XXX-XXXX to cancel and get a new one. If you need a new card immediately, please visit your local office.

Key Elements of a Successful Public Texting Campaign



Clear Goals



Compliance



**Markers of
Legitimacy**



**Actionable
Language**

Clear Goals.



Why pilot *anything?*

...to learn!

Pilots let you try something small, with **less risk** and **more flexibility**, so you can figure out *if* and *how* to scale.

Learning in pilots comes from...

- Articulating and externalizing goals
- Establishing clear measures of success
- Monitoring progress along the way
- Gathering feedback *before* and *after* you send texts
- Analyzing the outcomes of interest

Upon sending someone a text...

What do you want them to DO?

- When they receive the text?
 - After that?
 - After that?

WHY do you want them to do it? (What outcomes are you hoping for?)

- For recipients?
- For our staff or program?
- What do we want to be different/change?

A Hypothesis Framework

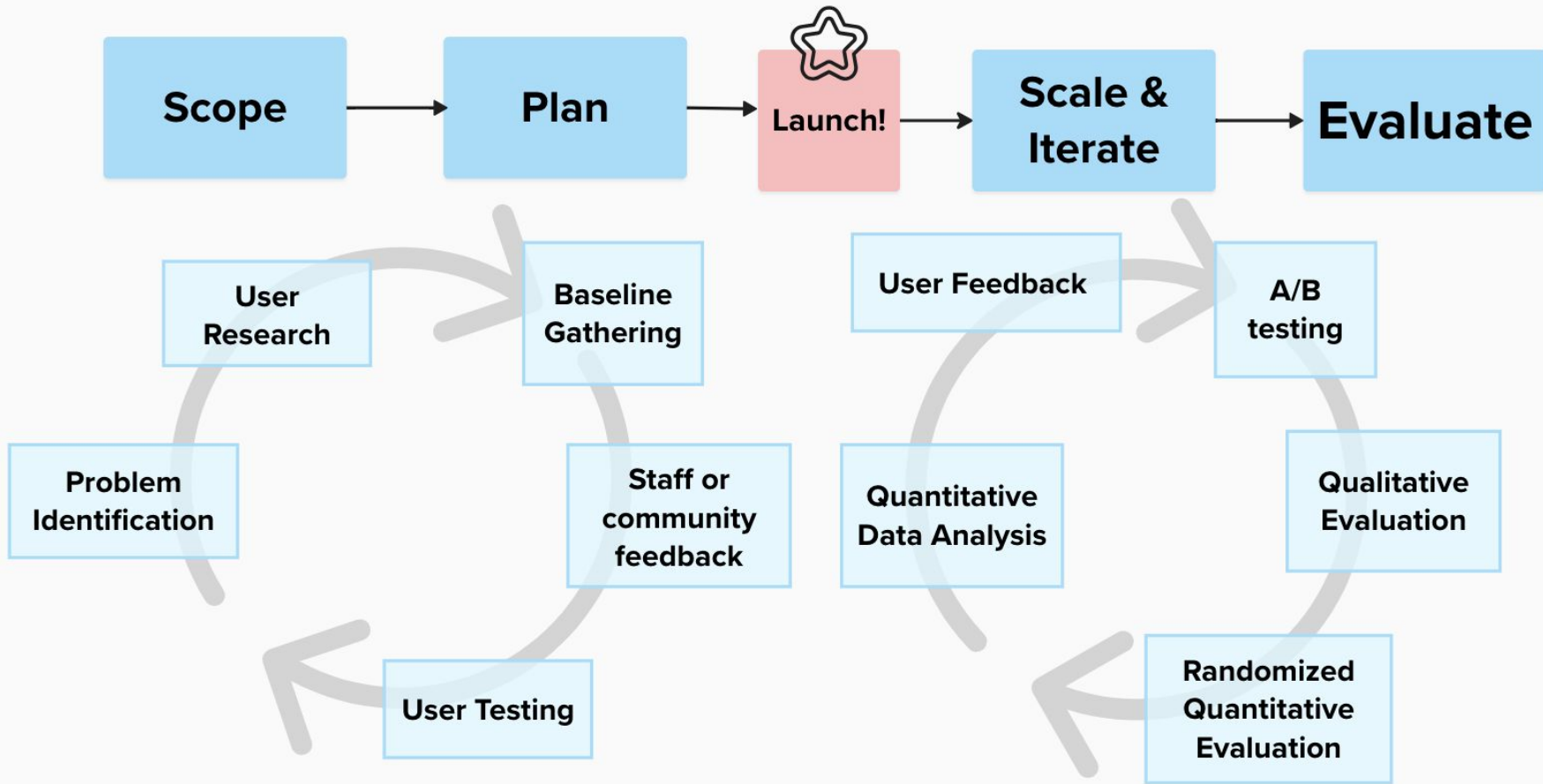
Goal: We want [specific desired outcome(s)].

Hypothesis: We believe that texting [specific sample of people] to take [desired action] will result in our desired outcome(s).

Example:

Goal: We want to prevent EBT card holders from experiencing lost cash benefits due to fraud.

Hypothesis: We believe that texting EBT card holders who have been identified as at risk for theft to cancel their card or reset their PIN will reach our desired outcome.



Compliance.



Consent

Federal and State programs *can* send without consent, but phone carriers or texting intermediaries might require it.*

When you do want or need to collect consent, do so when participants are providing their phone number if possible.

*U.S. Department of Health and Human Services
Declaratory Ruling, DA-23-62, Docket No. 02-272
(2023)

Opting Out

A recipient may **revoke** consent at any time through any reasonable means.*

*Rules and Regulations Implementing the Telephone
Consumer Protection Act of 1991, CG Docket No. 02-278,
WC Docket No. 07-35, Declaratory Ruling and Order,
published at 80 FR 61129, October 9, 2015

Personally-Identifiable Information (PII)

Phone numbers are technically PII

Consult with counsel to understand what information you can and cannot include in a text message.

Different programs and jurisdictions may have different rules and interpretations.

DON'T text sensitive information

Examples include

- Social Security Numbers
- Driver's License Numbers
- Personal Health Information
- Passwords

Assess Risk

Consider any risks presented if someone who is **not the intended recipient** receives the text message

Organizations can use the FCC's **Reassigned Numbers Database** to identify phone numbers that have been reassigned since the organization obtained them

Working with Texting Vendors and CTIA

- [FCC rulings](#) have affirmed that **state and federal governments are exempt** from the TCPA consent requirements.
- **When a person provides their telephone number to an entity, that constitutes “prior express consent”** to receive communications from that caller that are “closely related” to the purpose for which they provided their telephone number.
- And yet, Service Providers of text services (e.g., wireless carriers and vendors of automated messaging platforms) **require state and federal agencies to follow far more stringent consent collection protocols than what FCC rulings require.**
- In general, messaging providers have insisted that regardless of FCC’s rulings on TCPA requirements, in order for states to send texts to recipients, they **must conform with the Service Provider’s terms of service.**

Existing CTIA guidance on minimizing unwanted messages

- Use the FCC's Reassigned Number Database to verify your sending to recent phone numbers
- Confirm opt-in for recurring messages, as outlined in CTIA guidance, and honor opt-out requests, including by:
 - Ensuring that consumers are able to opt out from messages at any time
 - Sending one final opt-out confirmation message per campaign to notify the Consumer that they have opted-out successfully; ensuring that no other messages are sent after that final message;
 - Retaining and maintaining all opt-in and opt-out requests in their records to ensure that future messages are not attempted (in the case of an opt-out request) and Consumer consent is honored;
 - Processing telephone deactivation files regularly (e.g., daily) and removing any deactivated telephone numbers from any opt-in lists.

Markers of Legitimacy



People are conditioned be weary of texts they are **not expecting**.

SNAP Phony Text Message Alert (3/9/2023)

USDA is aware of several reports of criminals using phony text messages that say a recipient's SNAP EBT card has been locked. The text message provides a phone number to call for help. This is known as a phishing scam and is a type of fraud. If you do not know if a request for information about SNAP is real, contact your local [SNAP office](#).

Warning: Student Loan Debt Scam Robocalls and Robotexts

The FCC's Robocall Response Team and the Attorneys General of Illinois, Massachusetts, Michigan, and New Hampshire are warning consumers about a potential rise in student loan debt scam robocalls and robotexts in the wake of a recent Supreme Court decision. ([News Release](#) - June 30, 2023)



The screenshot shows the IRS website with a blue header containing the IRS logo and navigation links: Help, News, English, Charities & Nonprofits, and Tax Pros. Below the header is a dark blue bar with links: File, Pay, Refunds, Credits & Deductions, Forms & Instructions, and a search bar. The main content area has a breadcrumb trail: Home / News / News Releases. The headline reads: "IRS reports significant increase in texting scams; warns taxpayers to remain vigilant".

IRS

Help | News | English | Charities & Nonprofits | Tax Pros

File | Pay | Refunds | Credits & Deductions | Forms & Instructions | Search

Home / News / News Releases | IRS reports significant increase in texting scams; warns taxpayers to remain vigilant

IRS reports significant increase in texting scams; warns taxpayers to remain vigilant



To combat spam, inform people...

Before
texting

In the text

Upon
receipt

Before texting

“I mean people text this stuff every day and I don't answer it back. So no, unless you send me a letter saying what this is going to be, hi, this is what we're going to be doing in the next week or two, then I can look out differently.”

SNAP Client

Code for America Texting Pilot



Message About Messaging!

People **want** to be informed *before* receiving text messages.

- How do you communicate with them now?
- What trusted channels might they see *before* receiving a message?
- Who might need to be able to answer questions?

Consider


- Inserts in mailings
- Staff who interact with clients
- Community Organizations
- Websites

Message About Messaging, what to include:

Keeping track of your SNAP renewals just got easier!

In 2023, the Connecticut Department of Social Services (DSS) will text you reminders to submit your renewal form to help you keep your SNAP benefits.

- **We will always text you from an official DSS number:**
the DSS Benefits Center number (855) 626-6632 or a 5-digit number
- **We will never ask for your SSN or EBT PIN**
- Stop the messages by replying “OptOutSNAP”



CT DSS: Hi, we have some news!
In 2023, we will start sending text messages to help you manage your SNAP benefits. You could get your first text message in the next 2 weeks.

Check we have your cell phone number by going online to:

www.mydss.ct.gov



In the text

Introduce yourself

1 Known or communicated* Sending Number

*Tell people in promotional communications or directly in an introduction text what number your outreach will be coming from.

2 Affirm you will not collect personal information and provide additional places verify legitimacy.

1-888-555-6666

Virginia Medicaid: Welcome to text updates from the Virginia Department of Social Services. We'll always text you from this ^① number, save us to your contact list.

^② We will never ask for personal details in a text. If you have questions about how we protect your privacy, see [virginia.gov/privacy](https://www.virginia.gov/privacy)

In the text

Markers of legitimacy

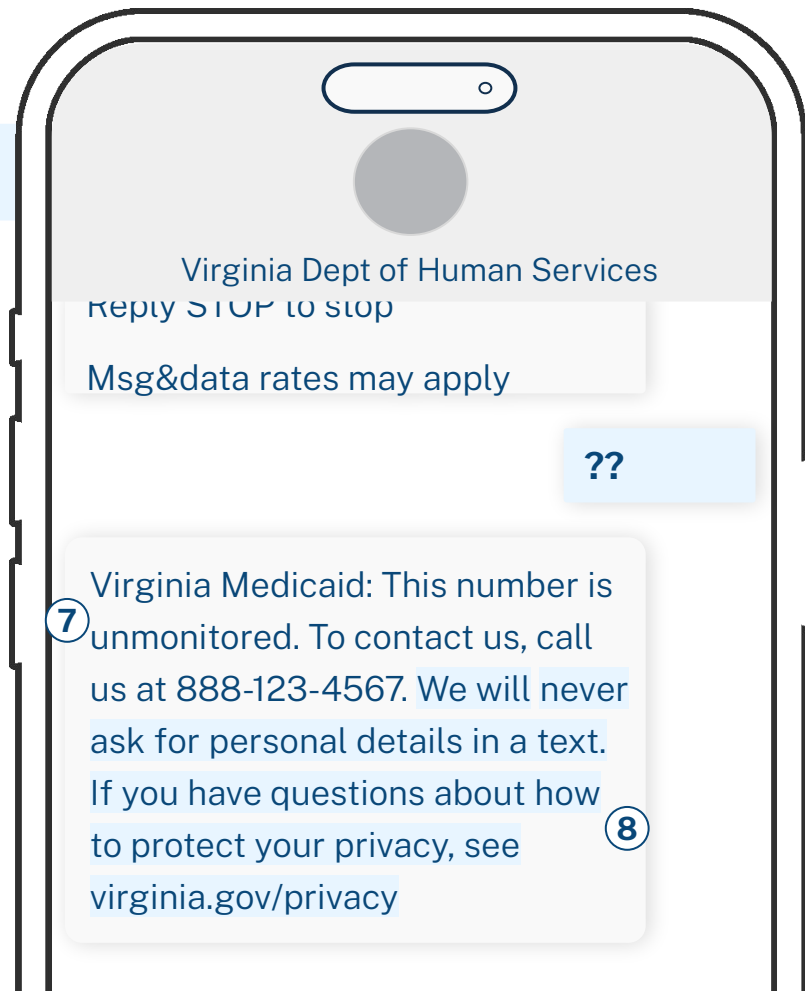
- ③ Consistent and familiar Service Name
- ④ Personalize with First Name. This is proven to increase follow-through.
- ⑤ Use full and direct .gov URLs
- ⑥ Provide opt-out instructions and disclaimer for the potential cost



Upon Receipt

Helpful auto-responses

- 7 Provide a way to contact a human in any auto-response text
- 8 Repeat consistent and standardized language across texts and programs



Upon receipt

Be Prepared for Questions

What trusted channels might people check *when* they receive a text from you? Who might they ask about about the text?



Websites

Post banner alerts about texting

Link to privacy policy and scam prevention tips



Staff

Give workers a heads-up about texts before and when they are sent

Share talking points and where to escalate any issues



Community Organizations

Alert them that texts are coming and what they look like

Enlist them to spread the word



IVR / Call Centers

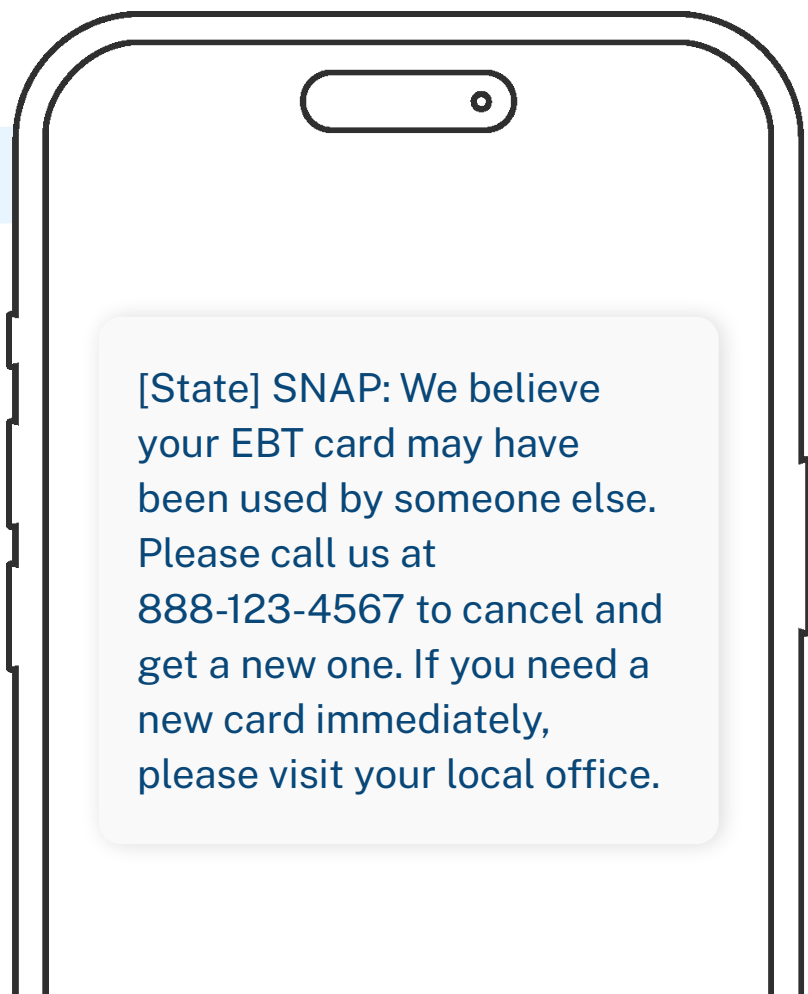
Consider adding automated messages about the texts

Actionable Language



Focus on action

- **Clearly state the issue and the response** you want the recipient to take.
- **Point directly** to where the action can be completed.
- **Make sure the action can be completed via mobile phone**, like call a person or go to a mobile friendly link.
- **Clearly explain the consequences** of not completing desired action.



[State] SNAP: We believe your EBT card may have been used by someone else. Please call us at 888-123-4567 to cancel and get a new one. If you need a new card immediately, please visit your local office.

Be clear and concise

Use simple, everyday language.

- Keep the text short and clear. Aim for under 300 characters.

Say only one important thing per message.

- Focus on the most essential instructions and information.

Use a neutral, professional tone.

- This has been proven more effective than a friendly tone through A/B testing.



[STATE] Medicaid: Your Medicaid coverage is expiring ((date)). You can renew online at www.application.state.gov. You can also renew over the phone on weekdays 7am-6pm at 800-123-4567.

Use Behavioral Science Principles to Encourage Action

When will you renew?

Reply 1 for today

Reply 2 for tomorrow

Individuals are more likely to follow through if they **create a plan**.

Thousands of residents already get an average of \$113/month in money for food.

Individuals are **strongly influenced by others' behaviors**.

Don't miss this chance to get free internet or \$30 per month off your internet bill.

Feeling a **sense of ownership** can influence behavior.

You likely have unclaimed free internet services that belong to you.

Individuals **perceive losses more powerfully** than gains.

Additional Resources

[FCC Training on Public Benefits Texting](#)

[Texting Playbook: Basics of Texting Safety Net Clients](#) (CfA)

[Reducing Sludge in Text Messages](#) (NSW)

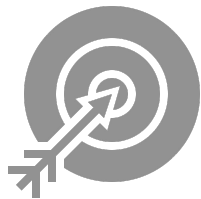
[VANotify Notification Guide](#)

[Using Text Message Outreach to Reduce SNAP Churn](#) (BDT)

[LA'Message Examples and Principles](#) (CfA)

[CTIA Best Practices for Messages](#) (CTIA)

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