

Requirements For Emergency Text Messages

Why Are Emergency Text Messages Special?

The Federal Communications Commission (FCC) requires SMS carriers to protect consumers from spam text messages. These rules are laid out in the Telephone Consumer Protection Act (TCPA).

For all non-emergency text messages, SMS carriers require you gather prior consent from recipients and message them over unique, sender-identifiable numbers. This helps them ensure your nonemergency messages are not spam.

Emergency text messages are different. They do not require prior consent, allowing you to reach people quickly with critical safety information. They are also allowed in different delivery methods to help them reach your recipients faster.

SMS Carrier Requirements Emergency Text Messages

Text messages sent for emergency purposes remain a special type of communication, as supported by the FCC and TCPA. When sending emergency messages, carriers require all senders, including Rave clients, to clearly identify all emergency messages with a sender name and an emergency label.

To support these requirements, all text messages sent through Rave Mobile Safety's Emergency SMS Profile must meet carrier-approved standards. Other messages must be sent using other operational SMS profiles.

Use the guidance and examples in this document to help inform your message category decisions and ensure you include the required labels for all emergency messages.

Carrier-Approved Labels

Each time you send an emergency message using Rave, you must include a carrier-approved emergency label in your alert. You must also include your sender name clearly in the message.

All emergency SMS messages must include one of these approved phrases:

- Urgent ABC Org Alert: Message content
- ABC Org Emergency: Message content
- ABC Org Critical: Message content

Separation of Emergency and Operational Messages

Rave takes care of the different handling of emergency text messages for you through the Emergency SMS Profile. All emergency text messages sent through Rave must use this profile. It provides you access to Rave Mobile Safety's public-safety shared short codes.

Operational messages (i.e. nonemergency messages) are **not allowed** in the Emergency SMS Profile. Incorrect use of the Emergency SMS Profile could result in carrier-required suspension of your domain from the Rave platform.

If your organization wants to send the types of messages described in the Operational Messages section, you must use a separate operational SMS Profile. Operational messages are not allowed in the Emergency SMS Profile.

Use Requirements – Manually Activated Alerts Only

Automatically generated alerts are only permitted in the Emergency SMS Profile if they originate from government entities such as the National Weather Service, or from life safety systems such as fire alarms.

All other emergency SMS messages must be initiated manually, either within the Rave Platform or through an integrated system.

Guidance on Emergency Text Messages (Permitted in Emergency SMS Profile)

You know your community, needs, and responses best. You determine which messages are emergency messages. This section provides a definition and examples to help you make these categorization decisions.

If you decide your message is an emergency text message, include “Urgent,” “Emergency,” or “Critical” in the message and send it via the Emergency SMS Profile.

Emergency Definition for Use Defining Message Category

An emergency is any event that poses an immediate threat to life, health, and/or property. Emergencies require urgent action to respond to, lessen, or avert potential impacts.¹

An emergency message is any message pertaining to an emergency, such as alerts, situational updates as the response progresses, all-clear messages announcing an incident’s conclusion, and post-incident updates or instructions about recovery actions.

Drill and test messages that simulate an emergency for practice and policy compliance reasons also qualify as emergency messages, because of their crucial part in allowing organizations to practice proper response measures.

Examples of Emergency Text Messages

This List is Not Exhaustive – Your Emergency Situation Does Not Need to Appear on this List

- Time-sensitive messages to improve recipient safety during violent incidents:
 - o “Active Shooter” / “Active Assailant” alerts
 - o Shelter-in-place directives
 - o Other situation updates during an event
 - o “All-Clear” messages at the end of an events
- Warnings related to imminent weather or natural disaster threats (tornadoes, severe thunderstorms, earthquakes, fires, hurricanes, etc.)
 - o Automatic alerts sourced from National Weather Service imminent weather threat feeds

¹ Definition derived from Federal Emergency Management Association (FEMA) and the Jeanne Clery Act definitions: *Glossary*. (n.d.). Training.fema.gov. Retrieved August 4, 2021, from <https://training.fema.gov/programs/emischool/el361toolkit/glossary.htm#E>
Timely Warnings and Emergency Notifications. (2021). Clerycenter.org; Clery Center. <https://clerycenter.org/policy-resources/the-clery-act/>

- o “Office Closed” or “Campus Closed” or “Pending Evacuation” messages due to an imminent weather threat
- o Parking ban announcements in response to imminent weather threats
- o Post-disaster assistance information
- Activation alerts for response teams in crisis or emergency response situations
- Clery-Act-required messages for assaults, homicides, robberies, and other covered incidents
- Post-disaster assistance or relief instructions¹
- Critical cybersecurity breach alerts
- Alerts for time-sensitive, critical operational incidents like power outages or life-safety equipment failures
- Internal alerts that launch a response to a life-threatening incident or one with significant safety concerns (e.g. healthcare Code Blue, Rapid Response, or patient elopement alerts)
- Drill or test messages to validate and practice emergency plans

For Situations that Can Vary, Evaluate Each Individual Incident for Emergency Status

Certain types of events always qualify as emergencies. Some never do. Many types, though, can vary from emergencies to minor incidents depending on specific context and impact.

In such cases, the alert author is responsible for assessing whether an event qualifies as an emergency and sending related text messages through the appropriate SMS profile. If you determine a message should be sent through the Emergency SMS Profile, make sure to include a carrier-required emergency label and a clearly identifiable sender name.

Guidance on Operational Text Messages (NOT Permitted in Emergency SMS Profile)

Definition of an Operational Text Message

Operational events do NOT threaten life, health, and/or property at the time of sending.

They may require urgent action to respond to, lessen, or avert potential impacts, but those impacts do not carry sufficient risk to categorize them as an emergency.

In addition, an operational event may:

- require eventual response actions to mitigate impact, which are not urgent
- not require response actions to mitigate impact
- be a routine, planned, or standard event
- occur for commercial, public relations, or recreational purposes

The FCC and SMS carriers require you gather recipient consent prior to sending operational messages.

An operational message is any message pertaining to an operational event, such as incident notifications, scheduling announcements, status updates, reminders, and after-event messages.

Weather watches and other messages sent ahead of potential emergency situations are also operational messages, because at the time of sending, there is no risk to life, safety and/or property, and their required response actions are not yet urgent enough to meet emergency criteria.

Examples of Operational Text Messages

This List is Not Exhaustive – Use the Examples Here to Help Inform Your Message Category Decisions

- Marketing messages announcing tickets are available to an event
 - Event update messages during an event
 - Thank-you messages sent after an event ends
- Forecasts and other informational weather notifications that do not address imminent threats
- Temporary road closure announcements
- Staffing alerts for most non-public safety and healthcare organizations
- Class cancellation messages due to a teacher's illness
- Reminders
 - Parking ban announcements ahead of street-sweeping
 - Upcoming deadline notifications (financial aid, classes starting, benefits enrollment)
- Any automated messages activated by an external system other than the National Weather Service