Development/Development Operations Standard Operating Procedure
SMS Messaging – Informational and Fundraising

Document Title: SMS Messaging – Informational and Fundraising
Document Number: 014
Effective Date: 7/1/2026
Review Date: 6/30/2027

Purpose:
Covenant House California uses SMS text messaging as a supplemental communication and fundraising channel to provide timely information, updates, reminders, solicitations and other communications to individuals who have affirmatively agreed to receive text messages from the organization. This SOP promotes consistent and compliant SMS practices across sites, supports data integrity, and ensures accurate and timely documentation and reporting.

SMS messaging is intended to supplement, not replace, email, postal mail, website communications, or other established communication channels.

Scope
This SOP applies to all employees, volunteers, contractors, vendors, and other representatives who send or manage SMS messages on behalf of Covenant House California.

All SMS communications must comply with applicable federal and state laws and regulations, applicable telecommunications requirements, our SMS service provider's requirements, and this policy.

Section 1. Consent and Opt-In

I. CHC will send SMS messages only to individuals who have provided appropriate consent to receive text messages from the organization.

II. Consent must be obtained through a clear and understandable opt-in process. The individual should understand:

a. That they are agreeing to receive SMS messages from CHC;

b. The general purpose or types of messages they can expect;

c. That message and data rates may apply;

d. How frequently messages may be sent, when applicable; and

e. How they can stop receiving messages.

III. Consent for SMS messaging will not be assumed merely because an individual has provided a telephone number to the organization, is a donor, volunteer, member, event participant, email subscriber, or otherwise has a relationship with the organization.

IV. SMS consent will be collected separately from consent for other communication channels.

V. The organization will maintain records of SMS consent in accordance with its record-retention practices.

Section 2. Use of Telephone Numbers

I. Telephone numbers collected for one purpose will not automatically be treated as permission to send SMS messages for unrelated purposes.

II. The organization will not purchase, rent, or use third-party lists of telephone numbers for SMS messaging unless the organization has verified that the individuals on those lists provided appropriate consent to receive messages from CHC for the relevant purpose.

III. CHC will take reasonable steps to avoid sending messages to individuals who have withdrawn consent or whose telephone numbers are no longer valid.

IV. CHC does not sell or share mobile numbers, SMS opt-in information, or consent information with third parties for their own marketing or promotional purposes. We may share this information with service providers and marketing partners who assist us in creating, managing, or delivering communications on our behalf. These partners may use information only as necessary to provide services to us and are not permitted to use it for their own marketing or promotional purposes.

Section 3. Message Content and Frequency

I. SMS messages should be relevant to the purpose for which the individual provided consent.

II. Messages should:

a. Clearly identify CHC when appropriate;

b. Be concise, accurate, and respectful;

c. Avoid misleading or deceptive language;

d. Provide information that is reasonably consistent with the individual's expectations when they opted in; and

e. Avoid unnecessary or excessive messaging.

III. CHC will make reasonable efforts to limit message frequency and avoid sending non-urgent messages during inappropriate hours.

IV. Carriers are not liable for any delayed or undelivered messages.

Section 4. Fundraising and Donation Messages

I. CHC may use SMS messaging to communicate fundraising appeals, donation opportunities, campaign updates, event-related fundraising information, and other messages that solicit charitable contributions.

4.2 Consent for Fundraising Messages

I. Fundraising and other promotional SMS messages will be sent only to individuals who have affirmatively opted in to receive such messages.

II. CHC will not consider a person's status as a donor, volunteer, member, event participant, email subscriber, or supporter, by itself, to constitute consent to receive fundraising text messages.

III. Where fundraising messages are included in an SMS program, the organization's opt-in process will clearly disclose that the individual is consenting to receive fundraising or promotional text messages, as applicable.

IV. CHC will maintain records sufficient to demonstrate when, how, and for what purpose the individual provided SMS consent.

4.3 Fundraising Message Identification

I. Fundraising SMS messages will clearly identify Covenant House California as the sender or otherwise make the organization's identity reasonably apparent.

II. Messages requesting donations will accurately describe the purpose of the fundraising appeal. The organization will not knowingly use misleading statements regarding:

a. The organization's identity or charitable purpose;

b. How a donation will be used;

c. Whether a donation is tax-deductible;

d. The impact or intended use of a donation; or

e. The organization's relationship with another organization, government agency, or individual.

4.4 Donation Links

I. When an SMS fundraising message contains a link to make a donation, CHC will use a legitimate organizational donation page or an authorized fundraising platform.

II. CHC will take reasonable measures to protect recipients from fraudulent or misleading donation links and will not use shortened or third-party links unless the organization has verified and approved the destination.

4.5 Frequency of Fundraising Messages

I. CHC will make reasonable efforts to avoid excessive fundraising messages and will establish appropriate limits on the frequency of SMS fundraising appeals.

II. Fundraising campaigns may temporarily increase message frequency when appropriate, but CHC will consider recipient expectations, prior messaging, and the risk of message fatigue when determining campaign frequency.

4.6 Opt-Out of Fundraising Messages

I. Recipients may opt out of fundraising SMS messages at any time by replying **STOP** or using another reasonable opt-out method provided by CHC.

II. If CHC offers different categories of SMS communications, it will clearly communicate whether an opt-out applies to all SMS messages or only to fundraising/promotional messages.

III. An individual who opts out of fundraising SMS messages will not be included in subsequent fundraising SMS campaigns unless and until the individual provides a new affirmative opt-in.

4.7 Fundraising Vendors and Partners

I. If CHC engages a third-party fundraising, messaging, or marketing provider to send SMS fundraising messages on its behalf, the organization will require the provider to comply with applicable law, telecommunications requirements, this policy, and the organization's consent and opt-out requirements.

II. CHC will not knowingly provide a vendor with telephone numbers for fundraising SMS campaigns unless the organization has a reasonable basis to believe that the recipients have provided the required consent.

III. CHC will maintain appropriate oversight of vendors sending fundraising messages on its behalf.

4.8 Compliance Review

I. Before launching a new SMS fundraising campaign, the responsible staff member (*ao 9.30.27 - Shirley Carter, Digital Marketing Manager*) should confirm:

a. The intended recipients have appropriate SMS consent;

b. The campaign's purpose is consistent with the consent obtained;

c. The message accurately identifies the organization and fundraising purpose;

d. The donation link has been reviewed and approved;

e. The message includes an appropriate opt-out mechanism;

f. Applicable frequency and quiet-hour practices have been considered; and

g. Any third-party vendor involved in the campaign has been appropriately authorized.

Section 5. Opt-Out and Revocation of Consent

I. Recipients may withdraw their consent to receive SMS messages at any time.

II. CHC will provide a clear and easy method for opting out, including by replying **STOP** to an applicable SMS message.

III. CHC will also honor reasonable opt-out requests communicated through other channels, such as email, telephone, or direct communication with organization staff.

IV. When an individual opts out, CHC will promptly update its SMS records and cease sending SMS messages to that individual, except for any limited message that may be necessary to confirm the opt-out or as otherwise permitted or required by applicable law.

V. Common opt-out terms such as **STOP, END, CANCEL, UNSUBSCRIBE,** and **QUIT** should be recognized and honored.

VI. Opting out of SMS communications does not necessarily withdraw consent for other communication channels, such as email or postal mail, unless the individual separately requests that those communications stop.

VII. CHC will provide recipients with a clear method for requesting assistance with SMS messaging. Applicable SMS program messaging and disclosures will include the instruction: Reply **HELP** for help. CHC will provide appropriate customer support contact information for assistance.

Section 6. Re-Subscription

I. An individual who has opted out of SMS communications may re-subscribe only through a new, affirmative opt-in process.

II. A previous consent to receive SMS messages will not be used to override a subsequent opt-out.

Section 7. Privacy and Data Protection

I. CHC will handle telephone numbers and SMS-related information in accordance with its privacy policy and applicable privacy and data-protection requirements.

II. Access to SMS subscriber information will be limited to individuals who need the information to perform their organizational responsibilities.

III. CHC will use reasonable administrative, technical, and organizational safeguards to protect SMS subscriber information from unauthorized access, use, disclosure, or loss.

Section 8. Third-Party SMS Providers

I. CHC will use ActiveCampaign as its third-party SMS platform, and will take reasonable steps to ensure that the provider supports:

a. Appropriate consent and opt-in processes;

b. Opt-out and consent-revocation mechanisms;

c. Maintenance of suppression/opt-out lists;

d. Appropriate data-security practices;

e. Required privacy disclosures; and

f. Applicable legal and telecommunications requirements.

II. CHC will maintain appropriate records of the SMS provider(s) it uses and the purposes for which they process subscriber information.

Section 9. Recordkeeping

I. CHC will maintain appropriate records relating to SMS communications, including, as applicable:

a. The date and method through which consent was obtained;

b. The telephone number associated with the consent;

c. The type or purpose of SMS communications authorized;

d. Opt-out and consent-revocation requests;

e. Dates on which opt-outs were processed; and

f. Other information reasonably necessary to demonstrate compliance.

II. SMS consent and opt-out records will be retained in accordance with the organization's applicable records-retention procedures.

Section 10. Staff Responsibilities

I. Employees and volunteers who send SMS messages on behalf of the organization are responsible for following this SOP.

II. No employee, volunteer, or contractor may upload or use a telephone-number list for organizational SMS messaging without confirming that the list was collected and maintained in accordance with this SOP.

III. Questions regarding consent, opt-outs, privacy, or the appropriate use of SMS should be directed to Alana Weinroth, Chief Development Officer.

Section 11. SOP Review

This SOP will be reviewed periodically and updated as necessary to reflect changes in applicable laws, regulations, telecommunications-industry requirements, organizational practices, and technology.

Section 12. Compliance

I. Failure to comply with this SOP may result in suspension of SMS messaging privileges and, where appropriate, disciplinary or contractual action.

II. CHC is committed to using SMS messaging responsibly and respectfully and to communicating only with individuals who have chosen to receive messages from the organization.