



# HOSPITALITY TECHNOLOGY REQUIREMENTS FOR NEW 988 REGULATIONS

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## About HTNG

Hospitality Technology Next Generation (HTNG) is a non-profit association with a mission to foster, through collaboration and partnership, the development of next-generation systems and solutions that will enable hoteliers and their technology vendors to do business globally in the 21st century. HTNG is recognized as the leading voice of the global hotel community, articulating the technology requirements of hotel companies of all sizes to the vendor community. HTNG facilitates the development of technology models for hospitality that will foster innovation, improve the guest experience, increase the effectiveness and efficiency of hotels, and create a healthy ecosystem of technology suppliers.

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# Hotel Industry Advisory on New Federal Laws Impacting Telecommunication Systems

This document is intended to provide an overview of new U.S. federal 988 laws as related specifically to the hospitality industry. The document is not a complete description of the laws, nor is it intended to provide legal position or advice.

## 1.1 Background

Too many Americans are experiencing suicide and mental health crises without the support and care they need. In 2019 alone, the U.S. had one death by suicide approximately every 11 minutes — and for people aged 10 – 34 years old, suicide has become the second leading cause of death.

The Substance Abuse and Mental Health Services Administration (SAMHSA) and the Department of Veterans Affairs currently maintain “The Lifeline,” a national network of over 180 local, independent and state-funded crisis centers equipped to help people experiencing emotional distress or a suicidal crisis. The Lifeline may be reached via phone, text or chat at 1-800-273-8255.

In 2020, Congress designated the new 988 dialing code to be operated through the existing National Suicide Prevention Lifeline for universal access to The Lifeline. Congress has also provided the Department of Health and Human Services workforce funding through the American Rescue Plan. In addition, the President’s Fiscal Year 2022 budget request provides funding for The Lifeline itself and for other existing federal crisis funding sources. At the state level, in addition to existing public and private sector funding streams, the National Suicide Hotline Designation Act of 2020 allows states to enact new state telecommunication fees to help support 988 operations.

SAMHSA sees 988 as a first step toward a transformed crisis care system in much the same way 911 has transformed and expanded emergency medical service access in the U.S.

## 1.2 FCC Compliance Mandate

On July 16, 2020, the FCC [adopted rules](#) to establish 988 as the new, nationwide, easy-to-remember three digit phone number for Americans in crisis to connect with suicide prevention and mental health crisis counselors.

- [Report and Order](#)
- 988 Fact Sheet: [ [English](#) | [Spanish](#) ]

These rules require phone service providers to direct all 988 calls to the existing National Suicide Prevention Lifeline by July 16, 2022. During this transition, Americans who need help should continue to contact the National Suicide Prevention Lifeline by calling 1-800-273-8255 (1-800-273-TALK) and through [online chats](#).



New rules apply to all telecommunication carriers in the United States of America to ensure that calls to 988 reach the National Suicide Prevention Lifeline. Note that this requirement is placed on the providers of voice service to the hotel, not on the hotel itself. However, we recommend including testing this capability at your properties.

## 1.3 Technical Implications for Hoteliers

### 1.1.1. 988 Dialing Compliance

While most PBX systems can support direct dialing of 988, some may not yet be configured to do so. As of **July 16, 2022**, all hoteliers should ensure their PBXs are configured for 988 direct dialing and determine whether their carrier is in compliance (i.e., 988 dialing connects to The Lifeline). Companies should check with their PBX Support Vendor for dial plan programming and request confirmation that their PBX complies. If their Carrier does not support 988, they should initially contact the Carrier, but ultimately report non-compliance to the FCC. While not required by the regulation, configuring your system to direct dial 988 - without requiring '9' or an outside line indicator prefix - is strongly recommended. This can be done by the PBX vendor or maintenance company in the same way 911 dialing without a prefix was recently accomplished.

## 1.4 Operational Implications for Hoteliers

### 1.2.1. Guest Privacy

PBX and Call Accounting Systems typically record and report on Guest calls. There is currently no guidance as to whether 988 calls should be:

- Visible
- Masked
- Reported as another Toll-Free call

### 1.2.2. 988 Call Failure

There is currently no guidance on 988 Call Failure obligations. This information may be of use in maintaining systems and potentially mitigating liability for 988 dialing failures. Call failure is not necessarily indicative of a carrier issue, and normal troubleshooting steps should be taken if this action occurs.

### 1.2.3. Staff notifications

There are systems that notify hotel personnel when 911 calls are placed. 911 staff notification technology could similarly be used for 988 call initiations. There is currently no mandate to employ such technology and deployment may have privacy implications. Guidance for implementation is a matter for a hotelier's legal, operational and risk management systems.



#### 1.2.4. Recommended hotel testing procedures

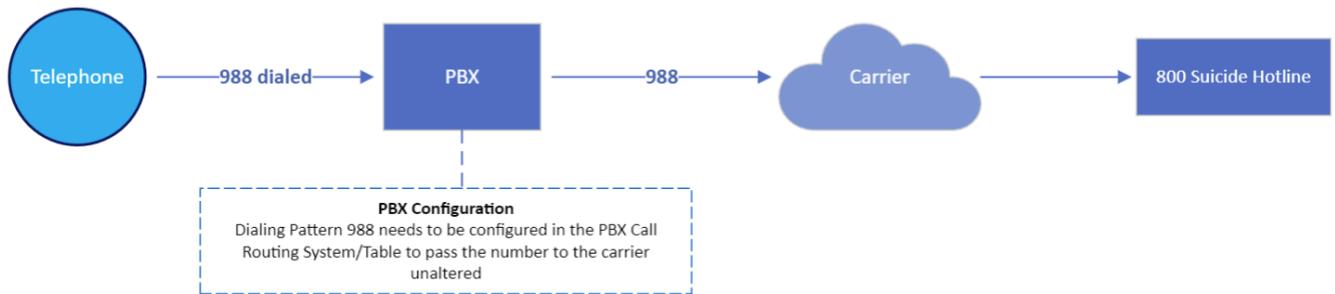
Final compliance testing is simple; place a call to 988 from phones within the property to ensure The Lifeline is reached. If this does not work, have your PBX vendor investigate and resolve the issue.



## 2.1 Appendix

The following diagram identifies common communication flows for emergencies.

### Flow Diagram of 988 Dialed Call



#### FCC Rules

The Federal Communications Commission (FCC) established 988 as the new, nationwide, 3-digit phone number for Americans in crisis to connect with suicide prevention and mental health crisis counselors. All service providers have until July 16, 2022 to be in compliance and direct 988 calls to the existing National Suicide Prevention Lifeline (1-800-273-TALK (8255)). Establishing the easy-to-remember 988 as the “911” for suicide prevention and mental health services will make it easier for Americans in crisis to access the help they need and decrease the stigma surrounding suicide and mental health issues.

Designating 988 for the National Suicide Prevention Lifeline | Federal Communications Commission (fcc.gov)  
<https://www.fcc.gov/document/designating-988-national-suicide-prevention-lifeline-0>

