



## MOAA Privacy Policy Implementation and Guidance

Dear Council and Chapter Leaders:

This All-President's message is dedicated to explaining [MOAA's revised privacy policy](#), what we have learned about the complexity of data privacy regulations and best practices, our plan to execute the policy, and important recommendations for you as council and chapter leaders.

### Summary:

As many of you know, MOAA headquarters has been working to share more national MOAA member data with our affiliates to help promote chapter membership and engagement. Over the past 18 months, and after consulting with outside legal counsel, MOAA has adopted a new privacy policy, which is being integrated now, and will dictate how we collect, protect, use, and disclose personal information, as well as how members can exercise their rights under data privacy laws to opt-out of chapter communications.

Most important for our volunteer leaders, the implementation of this new policy will open engagement channels to many non-chapter affiliated MOAA national members whose previous communication settings precluded direct affiliate communication. MOAA began communicating with national members, identified within various cohorts, in mid-October with the anticipation that many will accept the communication setting default allowing council and chapter communications. Following a 30-day period to opt out of these communications, contact information, to include mailing address, preferred phone number, and preferred e-mail address, on these new prospective chapter members will be made available to affiliate leaders. A more complete explanation of the new privacy policy and important implementation recommendations to council and chapter leaders follow.

As we prepare for this anticipated increase in prospective member data provided to our volunteer leaders, it is important that affiliate presidents and membership chairs have working access to the Committee Module, Near Real Time (NRT) Report, and Do Not Contact Report to process and document their new members and to respect national members' privacy preferences.

### Background:

Prior to October 2018, MOAA national policy was to default all new national members as opted out of communication with chapters unless they expressly agreed to such



communication. The unintended consequence of this pre-October 2018 policy was to preclude chapters from communicating with upwards to 270,000 national members for the purpose of chapter recruitment. After this date, MOAA revised its policy to default all new national members as opted-in to receive chapter communications unless expressly choosing to opt-out.

Members joining national MOAA after October 2018, and not specifically opting out of chapter communication, have had their personal contact information available to chapters – primarily shared monthly via the Near Real Time Report (NRT). Specifically, chapter presidents and membership chairs, registered and participating in the NRT, were alerted to new national members living within their catchment area, national members reporting a change of address into their catchment area, and national members that subsequently opted in to receive communications from chapters.

#### **Privacy Policy Implementation Milestones:**

- The week of October 20: A privacy policy change notification e-mail was sent to national membership. All national MOAA members with an e-mail address on file were apprised of our new privacy policy.
- October 24 to November 24: Allowance period for members to express their communications preferences to MOAA national.
- On or about December 1: MOAA national will begin sharing national member contact information with affiliates.

#### **Implementation Guidance:**

Based on our experiences with member recruitment and retention, we offer these recommendations:

First, please note that new prospective chapter member information generated as a result of MOAA's privacy policy change will NOT be transmitted to chapters via the Near Real Time Report (NRT) due to the volume of data expected to be provided. We are developing a means to securely transmit this additional prospective member data and will advise in the coming weeks.

Following the initial transition period, the NRT will continue to provide prospective member data with the current operating guidelines after the new privacy policy is implemented. MOAA national members who contact our Member Service Center after



the initial implementation period and choose to opt-out of chapter communications will be listed on the monthly Do Not Contact Report.

Also note that normal NRT operations will be interrupted during the time members will have to express their communications preferences.

### **Safeguarding of Member's Personal Information:**

As always, the obligation of national MOAA and our affiliates to safeguard members' Personally Identifiable Information (PII) is paramount. With the potential for many thousands of members now having their PII data in the hands of our affiliate leaders, more than ever we need to ensure this information is protected with the greatest integrity and discipline. At a minimum, leaders are asked to take the following actions as a prerequisite to receiving national MOAA membership data:

- Password protect your personal computer systems;
- Update your operating systems with the most current release and all patches;
- Ensure no one in your council or chapter sends PII via any unsecure channel, including but not limited to email, Teams or other collaborative platform, or as an attachment sent via any unsecure channel; and
- Install and update the latest version of malware, computer virus, and intrusion protection software.

### **Prospective Chapter Member Frequency of Contact Guidelines:**

Chapters should reach out to MOAA national prospective members no more than four times a year. This will prevent the triggering of spam filters which will divert and potentially block email communication to potential members. Also, many of our national members have not specified if their preferred phone number in the MOAA national database is a mobile number or landline. Therefore, we recommend you do not use text for your initial communication with prospective chapter members. Further, mass texts may run afoul of privacy laws and could expose a chapter to fines and legal action.

### **Restrictions on Sharing National Member Data with Third Parties:**

As affiliates of national MOAA, councils and chapters are specifically prohibited from selling or sharing, in any manner, member contact information obtained from national MOAA with third parties.



### **Recruiting Best Practices:**

Leaders are asked to make use of the many resources available when preparing to reach out to new prospective members. These resources include:

- Chapter Recruitment Guide, revised July 2025: [2025-chapter-recruitment-guide.pdf](#)
- Leaders Resource Manual: MOAA - Council and Chapter Leaders Resource Manual
- Recruitment and Retention Roundtable, July 2025: MOAA - July 2025 Council and Chapter Virtual Roundtable

When considering the long-term health and effectiveness of our chapters, there is a clear imperative to recruit younger members. These members, generally defined by our association as 40-60 years of age, bring relevant experience and leadership, and provide longevity in membership and leadership potential. To attract and retain these younger members, chapter leaders are implored to reimagine their current activities, social gatherings, and overall culture. Our younger demographic is made up of doers, people who value being involved in activities that promote our mission and support the military and veteran community. A chapter that exists primarily as a “social club” or whose meetings are dominated by partisan political discussion simply will not resonate with this demographic. Likewise, chapters that meet exclusively in smaller lunch and dinner venues, often during working hours, will not attract these younger members who are in a different stage of life.

### **A sample opening paragraph for your initial e-mail to prospective chapter members follows:**

I/We are writing because we understand you are a member of MOAA national and reside in our chapter's service area. Accordingly, I/we would like you to consider joining our chapter and supporting our work in service to the military and veteran community.

### **Reminder and Recognition of Members' Right to Opt-Out of Local Communications:**

When contacting prospective chapter members via e-mail, you are required by law to afford them the opportunity to opt-out of communications with your chapter. While these prospective members will initially be given 30 days to opt out after they are advised of our new national privacy policy, you must also provide that opportunity in all electronic correspondence with prospective chapter members. Further, local and virtual



chapters must maintain records of national MOAA members opting-out of communications with your chapter, and you must honor their expressed preference. Failure to do so could result in legal liability for your chapter.

**A sample opting-out paragraph to include in your e-mail communications follows:**

You are receiving this e-mail communication because you are a MOAA national member and are eligible for membership with your local MOAA chapter. If you do not desire to receive further communications from our (council or chapter), please reply to this e-mail and add "unsubscribe" to the subject line.

Unsubscribe requests must be honored, and no additional e-mail communications are permitted. We recommend this paragraph be placed at the end of all council and chapter communications with non-chapter affiliated national MOAA members.

With the implementation of this new privacy policy, MOAA national also expects to receive requests from national members who prefer not to receive chapter communications. We will continue to share this information with councils and chapters via the monthly Do Not Contact Report, and we ask you to respect these communications preferences.

**Conclusion:**

As you are now aware, this revision of MOAA's privacy policy is complex and will inevitably be a work in progress, even after we begin sharing more prospective chapter member information. We will use every training opportunity in the foreseeable future to help educate, discuss, and capture best practices and lessons learned. Our association is committed to maintaining the health and effectiveness of our affiliate system. As our volunteer leaders, you will play a critical role in seizing the prospective membership growth opportunities this revised privacy policy enables. Your Affiliated Councils and Chapters team at MOAA headquarters stands ready to help facilitate your recruitment efforts, to include reviewing your new member chapter invitation templates and overall outreach plan.

Thank you for your leadership and we look forward to sharing the membership and leadership success this revised policy will bring.

Very Respectfully,

CAPT Frank J. Michael, USN (Ret)  
Senior Director, Affiliated Councils & Chapters