

## Health Financial Guardians LLC

### Robocall Mitigation Program Description

**Company Overview:** Our organization is committed to providing high-quality services to clients, including important updates about their health insurance policies. All clients have given explicit, documented consent to receive calls regarding these updates. We prioritize compliance with all relevant regulations, including the Telephone Consumer Protection Act (TCPA), and implement robust internal procedures to ensure compliance and mitigate the risk of illegal robocalls.

**1. Explicit Client Consent:** We only contact clients who have provided explicit consent to be contacted. Consent is obtained and documented during client onboarding and updated as needed to maintain compliance. We ensure that all communications align with the scope of the consent provided by the client.

**2. Segmented Databases:** We maintain segmented client databases to ensure that calls are directed only to individuals who have opted in to receive updates. Our systems are designed to identify and organize clients based on their preferences and the type of information they wish to receive. Each database is maintained separately to ensure targeted outreach, and calls are segmented to specific groups of clients as needed.

**3. Do Not Call Compliance:** Our system integrates various Do Not Call (DNC) methods to ensure compliance with federal and state regulations:

- We regularly scrub our call lists against the National Do Not Call Registry to prevent contacting clients who have opted out.
- Clients have the option to opt out of future calls at any time, and their preferences are promptly updated in our system.
- We also honor internal DNC requests from clients, ensuring their preferences are respected immediately.

**4. Regular System Updates and Audits:** Our robocall mitigation systems are updated regularly to ensure they meet the highest standards of performance and compliance. We conduct periodic audits to ensure that all processes, from consent collection to DNC list management, are functioning as expected and are in compliance with current regulations.

**5. Data Backup and Security:** All client data is securely stored and backed up regularly to ensure the integrity and availability of critical information. Our databases are housed in secure environments, and access is restricted to authorized personnel only. Backups are conducted according to industry standards to prevent data loss or corruption.

**6. Call Monitoring and Reporting:** We employ a comprehensive call monitoring and reporting system that tracks call patterns and behavior. If irregularities are detected, we investigate immediately and take corrective actions to ensure compliance. We log all outbound calls, including the date, time, and client information, to maintain accountability and transparency.

## 7. Robocall Mitigation Process:

- **Automated Call Analysis:** Our system filters and analyzes outbound calls in real-time to ensure that only permissible calls are made. This system flags any potentially non-compliant calls before they are made.
- **Call Authentication and Validation:** We use industry-standard call authentication protocols, including STIR/SHAKEN, to prevent illegal spoofing of phone numbers and to ensure the legitimacy of our calls.
- **Caller ID Management:** Our outbound caller ID is fully compliant with the Federal Communications Commission (FCC) regulations, ensuring transparency and accountability.

**8. Internal Compliance Training:** Our staff undergoes regular training on compliance with federal and state robocall regulations, including the TCPA. We educate our team on best practices, changes in the law, and our internal procedures to mitigate the risk of non-compliant calls.

**9. Continuous Improvement:** Our robocall mitigation program is subject to ongoing review and improvement. We actively track regulatory changes and industry best practices to ensure our processes are up-to-date. Any deficiencies identified through our audits are promptly addressed through process changes, updates to our systems, and employee retraining.