



Robocall Mitigation Program Description

Filer Name: Chronic Care Management, Inc.

FRN: 0037060407

Certification Option Selected: Option 3 – No STIR/SHAKEN Implementation

Voice Service Provider Role in the Call Chain: Voice Service Provider without a STIR/SHAKEN obligation

Date: May 20, 2025

1. Overview of Robocall Mitigation Program

Chronic Care Management, Inc., doing business as Cosán Group ("Cosán"), originates patient engagement and care coordination calls on behalf of its healthcare provider clients. All calls are made in support of HIPAA-compliant care management programs, including chronic care management (CCM), principal care management (PCM), remote patient monitoring (RPM), and other value-based care services.

Cosán does not operate its own SIP-based voice network or interconnect directly with the PSTN. Instead, Cosán currently uses **Twilio Inc.**, a registered STIR/SHAKEN-enabled voice communications provider, to originate calls and perform STIR/SHAKEN attestation. Twilio handles all call authentication and attestation on behalf of Cosán, as Cosán does not operate its own SIP-based network or hold STIR/SHAKEN credentials.

Cosán is in the process of migrating its call infrastructure to **Bandwidth Inc.**, another certified STIR/SHAKEN-capable provider, and will update its registration accordingly once the migration is complete.

Cosán Connect Limited, a wholly owned subsidiary of Chronic Care Management, Inc., provides call center and operational support functions. All calls are originated through systems, numbers, and platforms owned and managed by Chronic Care Management, Inc., and Cosán Connect does not operate as an independent voice service provider.

2. Mitigation Policies and Practices

Cosán has implemented the following robocall mitigation measures consistent with 47 CFR § 64.6305(a):

- **Know Your Customer (KYC):** Cosán only places calls on behalf of contracted healthcare provider clients. All clients undergo identity verification, and calls are initiated solely for treatment, care coordination, and other legitimate healthcare purposes.
- **Caller ID Management and Brand Authorization:** Cosán verifies and documents written consent from clients to use their brand names and caller ID information for outbound calls. For calls placed via Twilio, Cosán participates in Twilio's Brand Verification and STIR/SHAKEN trust framework, submitting each campaign for approval and verifying the business relationship with the healthcare provider customer. This ensures that all branded caller ID usage is authorized and compliant with both Twilio's verification process and federal robocall mitigation expectations. Cosán either uses numbers owned by the customer's carrier or provisions new numbers under its own account, with proper campaign-level registration and disclosure of use cases.
- **Call Initiation Methods:** Cosán uses a mix of manual dialing, IVR-driven outreach, and AI-enabled virtual voice agents to conduct patient engagement activities. This includes:
 - Scheduled appointment confirmation calls via IVR dialer systems.
 - Prerecorded voice messages from providers (played to the patient when answered), used with documented authorization.
 - Voice-activated virtual agents that engage patients in structured, rules-based dialogues to confirm participation in care programs or to initiate follow-up actions.

These calls are placed under the providers' direction and with the appropriate consent or notice, in compliance with HIPAA and TCPA. All such calls are tracked, logged, and quality reviewed.

- **Robocall Controls and Complaint Oversight:** Cosán maintains a strict vetting and consent process for all automated and prerecorded call workflows. Controls include:
 - Provider-signed scripts and approvals for content.
 - TCPA-aligned opt-in or notice procedures.
 - Call frequency and time-of-day restrictions.
 - Real-time monitoring and audit logging.
 - Escalation processes for complaints and resolution protocols.
- **Internal Call Control and Quality Enforcement:** All calls are initiated and handled exclusively by Cosán employees or AI agents operating within Cosán-managed systems. Cosán does not outsource call generation to third-party call centers or contractors. Cosán records outbound calls for quality assurance and compliance purposes and uses this data to audit agent behavior, confirm adherence to approved scripts, and identify any deviation from campaign requirements. These recordings, along with real-time transcription and monitoring tools, enable prompt issue resolution and enforcement of mitigation standards.
- **Traceback and Cooperation Commitment:** Cosán commits to responding fully and within 24 hours to all traceback requests from the Commission, law enforcement, or the industry traceback consortium, and to cooperating in the identification and cessation of any illegal robocall activity.

Cosán maintains its Robocall Mitigation Database (RMD) registration in accordance with the expectations of both current and future upstream providers, including Twilio and Bandwidth. Cosán will continue to cooperate with traceback, enforcement, and analytics programs required by those partners and the FCC.

Cosán's mitigation approach aligns with Bandwidth's three-pronged model of **prevention**, **detection**, and **mitigation**, ensuring continuity with industry best practices throughout the transition.

3. STIR/SHAKEN Implementation Exemption

Cosán is exempt from direct STIR/SHAKEN implementation requirements under **47 CFR § 64.6304(a)(2)** because:

- Cosán does not have control over the SIP signaling used to initiate calls.
- Outbound call traffic is currently originated through **Twilio Inc.**, which performs STIR/SHAKEN attestation.
- Cosán does not hold STI certificates and is not capable of signing SHAKEN tokens directly.

While Cosán is migrating its infrastructure to **Bandwidth Inc.**, all robocall mitigation policies remain consistent and will continue to apply regardless of the underlying provider.

Although Cosán uses automated calling technologies to execute provider-directed outreach, all such calls are routed and authenticated through Twilio or, in the future, Bandwidth. Cosán focuses its mitigation efforts on verifying caller identity, controlling outbound call practices, ensuring quality, and promptly responding to any traceback or complaint activity.

This Robocall Mitigation Program is actively enforced and reviewed as part of Cosán's broader compliance, quality, and patient safety initiatives.