

Robocall Mitigation Program

Recipient: Robert Andrews <robert@redoak-counseling.com> • **Role:** Signer • **Sent:** April 27, 2026 • **Signed:** April 27, 2026 at 9:02 AM • **Signer IP:** 24.119.221.210

Robocall Mitigation Program — Red Oak Counseling

Entity: Red Oak Counseling

Address: 1406 N Main St. Suite 114

Primary contact: Robert Andrews — robert@redoak-counseling.com — (208)953-7721

Date of last review: April 27, 2026

1. Nature of operations

Red Oak Counseling is a licensed mental-health counseling practice. We are an **end-user of voice services**, not a voice service provider, reseller, or originating carrier. Upstream voice service and STIR/SHAKEN call signing are provided by our underlying carrier ([Bandwidth.com, Inc.]).

2. Description of voice traffic

- **Inbound:** Appointment scheduling, intake calls, returning client calls, calls from referring providers and insurers.
- **Outbound:** Clinician-to-client communications, appointment reminders to existing clients who have given prior express consent at intake, and routine business administration (insurers, pharmacies, referring providers).

Red Oak Counseling **does not engage in** any of the following:

- Unsolicited telemarketing
- Autodialed marketing calls
- Prerecorded sales messages
- Lead generation
- Political or fundraising robocalls
- Mass outbound dialing without prior express written consent

3. STIR/SHAKEN

All outbound calls are delivered to our upstream carrier, which signs the call with its STI-PA-issued certificate at attestation level **A (full attestation)** because all calls originate from our single registered DID, which we exclusively control. Red Oak Counseling does not spoof caller ID and does not originate calls outside its assigned numbers.

4. Mitigation practices

- **Single registered DID:** All outbound calls present one verified caller ID number assigned to Red Oak Counseling.
- **No spoofing:** The PBX dialplan rejects any outbound call whose caller-ID does not match the registered DID.
- **Restricted origination:** Calls can only be placed from authenticated SIP extensions assigned to staff. No API or external bulk-dialing access exists.
- **Consent-gated reminders:** Appointment reminders are sent only to phone numbers belonging to existing clients who consented at intake. Numbers are sourced from our encrypted client record system, not from purchased or harvested lists.

- **Rate limits:** Reminder traffic is rate-limited at the PBX to no more than [N] concurrent calls and [N]/min new attempts.
- **CDR retention:** Call detail records are retained for at least 12 months to support traceback requests.
- **Staff training:** Personnel who initiate outbound calls are trained on TCPA and HIPAA at hire and annually thereafter.

5. Traceback cooperation

Red Oak Counseling commits to responding to any traceback request from the Industry Traceback Group (ITG) within 24 hours and to FCC inquiries within the time frame specified in the request.

Traceback contact: Robert Andrews — robert@redoak-counseling.com — (208)953-7721

6. Complaint handling

Any complaint regarding a call originated by Red Oak Counseling is investigated within five business days. Affected numbers are immediately removed from outbound reminder queues pending resolution, and the complainant receives written acknowledgement and findings.

7. Annual review

This Robocall Mitigation Program is reviewed at least annually and updated whenever there is a material change in calling activity, technology, or upstream carrier.

8. Certification

I certify, under penalty of perjury, that the information in this Robocall Mitigation Program is accurate and complete, and that Red Oak Counseling is committed to the practices described herein.

Name & Title: Robert Andrews, Clinic Manager

Signature:  	Date: April 27, 2026
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