

One Health Link

Robocall Mitigation Program

1. Overview

One Health Link is an application-layer healthcare workflow and communications platform. Authorized healthcare organizations, health plans, healthcare providers, pharmacies, and approved service providers use it to carry out healthcare operations and care coordination.

The platform's voice functionality is not an open calling service, predictive dialer, or telemarketing tool. Calls occur only within defined healthcare workflows, such as contacting a pharmacy to correct or complete a prescription-related action, coordinating administrative activity with a provider or pharmacy, or following up with a patient about that patient's own care.

Bandwidth is One Health Link's underlying voice service provider. One Health Link does not operate carrier-level voice network infrastructure, does not provide direct PSTN interconnection, does not operate as a facilities-based carrier, does not authenticate caller ID at the SIP network layer, and does not hold an SPC token or STIR/SHAKEN certificate.

One Health Link has therefore selected "No STIR/SHAKEN Implementation" under 47 CFR § 64.6305(d)(1)(iii). The basis for this selection is that One Health Link lacks control over the network infrastructure necessary to implement STIR/SHAKEN, as contemplated by 47 CFR § 64.6305(d)(2)(i). Network-level STIR/SHAKEN authentication is performed by Bandwidth or another registered upstream voice service provider involved in call origination and delivery.

2. Scope of Authorized Calling

Voice calls are permitted only for legitimate healthcare operations, care coordination, prescription- and pharmacy-related activity, provider coordination, and related administrative purposes. Most calls are placed to businesses: pharmacies, provider offices, health plans, and approved service providers. Some workflows involve calls to patients about their own care, such as prescription status or care coordination follow-up. Those calls arise from an existing healthcare relationship and are never marketing.

Calls are initiated by platform workflows, user-authorized actions, or AI-assisted workflow agents, and only when a defined operational trigger exists. Where a call uses an artificial or AI-generated voice, it is placed within an approved healthcare workflow and in compliance with applicable consent and disclosure requirements, including TCPA and FCC rules governing artificial and prerecorded voice calls.

Permitted calling activity includes:

- Contacting a pharmacy to correct, clarify, or complete a prescription-related action.
- Contacting a pharmacy about claim reprocessing, prescription routing, prescription status, or related administrative follow-up.
- Coordinating an authorized healthcare workflow with a healthcare provider, pharmacy, health plan, or approved service provider.
- Following up with a patient regarding that patient's own prescription or care, where authorized under the applicable workflow.

The platform may not be used for illegal robocalls, caller ID spoofing, fraud, scams, abusive high-volume calling, telemarketing (including prerecorded or artificial voice telemarketing), lead generation campaigns, debt collection campaigns, political calling campaigns, or consumer marketing.

3. Workflow-Triggered Call Controls

Calling on the platform is workflow-triggered. A call is placed only when a defined healthcare workflow or operational action requires voice outreach; the platform is designed to prevent open-ended calling. Specifically, One Health Link:

- Ties each call to a specific healthcare transaction, task, prescription issue, or approved administrative workflow.
- Records the initiating customer, user, workflow, timestamp, called number, caller ID, and operational purpose for every call.
- Blocks use cases it has not approved.
- Reviews unusual or excessive calling activity.
- Suspends or disables calling access for a customer, user, workflow, or account when it detects suspicious or unauthorized activity.

4. Customer Identification and Due Diligence

Before enabling voice calling, One Health Link confirms who the customer is and why it needs to call. This review is designed to satisfy One Health Link's obligation to know its customers and to prevent use of its services for illegal calling. As part of this process, One Health Link:

- Verifies the customer's business identity and healthcare-related role.
- Confirms the customer's business purpose for voice calling and reviews the proposed use case before enabling production calling.
- Limits calling access to approved customers, users, workflows, and operational purposes.
- Requires customers, through its agreements and acceptable use policies, to comply with applicable law, including rules on robocalls, caller ID, consent, privacy, and healthcare communications, and prohibits illegal robocalls, spoofing, fraud, misleading calling practices, and unauthorized prerecorded or artificial voice campaigns.
- Retains records sufficient to identify the customer, account, or workflow responsible for any outbound call.

Anonymous, unverified, or unauthorized parties cannot initiate outbound calls through the platform.

5. Upstream Provider Controls

One Health Link relies on Bandwidth for network-level voice service functions, including STIR/SHAKEN authentication where applicable, and does not independently provide PSTN interconnection or carrier-level call authentication. If One Health Link adds or changes upstream voice providers, it will review the new relationship for lawful calling, call traceability, and robocall mitigation, and will update this program description and its Robocall Mitigation Database filing as required.

6. Traffic Monitoring and Analytics

One Health Link monitors outbound calling through internal platform logs, workflow records, call detail records, customer account activity, caller ID usage, and volume, frequency, and destination patterns. Indicators it reviews include unusual or excessive call volume, calling inconsistent with an approved workflow or use case, invalid or suspicious caller ID usage, repeated calls to unrelated destinations, sudden spikes in activity, and complaints, traceback requests, or carrier notices.

This monitoring uses internal operational tools and the reporting available through One Health Link's upstream voice provider relationship. One Health Link does not currently use a third-party robocall analytics vendor. If it engages one in the future, it will update this program description accordingly.

7. Investigation, Suspension, and Remediation

One Health Link investigates suspicious or unauthorized calling promptly, whether identified through its own monitoring, customer review, an upstream provider notice, a traceback request, a complaint, or an FCC or law enforcement inquiry. Depending on the facts, it reviews the relevant call and workflow records, contacts the customer, requires corrective action, restricts or terminates calling access, blocks the unauthorized use case, coordinates with Bandwidth or other upstream providers, preserves relevant records, and cooperates with the FCC, law enforcement, and the Industry Traceback Group.

One Health Link reserves the right to immediately suspend or terminate voice calling access for any customer, user, workflow, or account it believes is engaged in illegal robocalling, spoofing, fraud, abusive calling, or other unlawful activity.

8. Traceback Cooperation

One Health Link commits to responding fully and within 24 hours to traceback requests from the FCC, law enforcement, and the Industry Traceback Group, and to cooperating with those entities in investigating and stopping illegal robocall activity. Its records identify the customer, user, account, workflow, calling number, called number, timestamp, and operational purpose associated with each outbound call, which supports prompt traceback response.

9. Recordkeeping

One Health Link maintains the records needed to support robocall mitigation, traceback response, customer accountability, and investigations: customer account information, approved use cases, workflow records, call detail records, caller ID information, timestamps, the user or system action that initiated each call, and records of investigations and remediation. These records are retained in accordance with One Health Link's legal, operational, privacy, security, and contractual requirements.

10. Regulatory History

One Health Link has not been the subject of a formal FCC, law enforcement, or regulatory agency action or investigation with findings of actual or suspected wrongdoing for transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or for a deficient Robocall Mitigation Database certification or mitigation program description.

11. Program Review and Updates

One Health Link reviews this program periodically and updates it for changes in its voice functionality, customer use cases, upstream provider relationships, applicable law, or operational risk. If its network

role changes, if it gains the ability or obligation to implement STIR/SHAKEN directly, or if it changes its upstream voice provider model, One Health Link will evaluate whether its Robocall Mitigation Database filing requires updating.