Robocall Mitigation Plan

healow, its affiliates and subsidiaries

Legal Entity *healow* & its affiliates	**Brands** *healow*	**Industry** Healthcare IT / EHR and Patient Engagement
Plan Effective Date 11/12/2026	**Review Cycle** Annual, or upon material change	**Plan Owner** *healow* Office of Compliance

1. Introduction

Pursuant to 47 CFR § 64.6305, voice service providers must file certifications in the Federal Communications Commission's Robocall Mitigation Database describing their implementation of the STIR/SHAKEN caller ID authentication framework and/or a robocall mitigation program. This Robocall Mitigation Plan ("Plan") describes how *healow*, its affiliates and subsidiaries (together, "*healow*") manage voice traffic to prevent the origination of illegal robocalls, spoofed caller ID, and unsolicited calling.

Because *healow* voice traffic frequently relates to Protected Health Information (PHI), this Plan is designed to meet telecommunications compliance obligations without compromising HIPAA Privacy and Security Rule safeguards. Monitoring and enforcement described below operate on call detail records, call metadata and consent records rather than on PHI content.

2. Company and Service Overview

healow provides services to electronic health record (EHR), practice management and patient engagement software to physician practices, clinics and health systems ("Customers"), which are HIPAA covered entities. Through the *healow* platforms, Customers communicate with their own existing patients. Voice services are limited to the following healthcare use cases:

- Automated patient notifications: outbound automated calls for appointment reminders and confirmations, missed appointment rescheduling, balance due notifications, preventive care and immunization reminders, and one-time passcodes for patient identity verification.
- Staff initiated patient calls: outbound calls placed manually by practice staff to individual patients from within the application.
- Practice phone lines with AI assistance: inbound calls from patients to their practice's phone number, answered by an AI voice agent that can schedule, answer questions and transfer to practice staff.
- Outbound automated patient outreach: automated conversational calls to existing patients for healthcare purposes such as scheduling and care reminders.

healow does not offer general purpose, open dialing, does not sell calling services to non-healthcare customers, and does not permit telemarketing on its platform.

3. STIR/SHAKEN Implementation Status

healow does not operate its own facilities-based voice network and does not hold its own STI-GA token. *healow* routes outbound voice traffic through upstream voice service providers which perform STIR/SHAKEN signing on *healow's* behalf. *healow* passes the caller ID information required for its

upstream providers to apply the appropriate attestation level and only uses telephone numbers it has been assigned or has verified the Customer's right to use (Section 5).

4. Customer Vetting

healow only provides voice services to healthcare organizations that have executed a master agreement and a Business Associate Agreement with *healow*. Before any voice service is enabled, *healow* verifies:

- Legal entity name, physical address and state of organization.
- Federal Employer Identification Number (EIN) and, where applicable, National Provider Identifier (NPI).
- Named administrative and technical contacts at the Customer.
- That the Customer is a healthcare provider using the service to communicate with its own patients.

Customer agreements prohibit use of the services for telemarketing, unsolicited calls, spoofing, or any activity that violates federal, state or local law, including the Telephone Consumer Protection Act (TCPA) and the Truth in Caller ID Act. *healow* reserves the right to suspend or terminate voice service for any violation.

5. Telephone Number and Caller ID Controls

- Inbound/Outbound DID numbers are provisioned by *healow* through its upstream providers and assigned to a single specific Customer.
- Where a Customer wishes to use a number it already owns, *healow* requires proof of the Customer's right to use the number, such as a carrier billing statement or a signed Letter of Authorization, and completes verification with its upstream provider before the number is used or ported.
- Customers cannot enter non-vetted DID values. The platform only presents numbers assigned to or verified for that Customer.

6. Platform Controls

- Event driven calling: automated calls are triggered by records in the Customer's EHR or practice management system, such as a scheduled appointment, an outstanding balance or a care reminder, for that Customer's existing patients.
- Template controlled content: automated call content is generated from Customer configured healthcare templates.
- Rate limits: outbound automated calling is managed by *healow* based on the number of patients and average volume of calls per Customer.
- Calling windows: automated calls are restricted to predetermined windows in the patient's local time zone, notwithstanding emergency use cases (i.e. weather cancellations and natural disasters).
- AI voice calls: outbound calls using an AI or artificial voice are placed only to patients for whom the Customer has the consent required under the TCPA, and identify the calling practice at the start of the call.

7. Consent and Opt-Out

Customers are contractually required to obtain and maintain the patient consent required by law before automated calls are placed. Every automated outbound call identifies the calling practice and offers an opt-out. Opt-out requests are recorded automatically and suppress future automated calls to that number for that Customer.

8. Ongoing Monitoring

healow routinely monitors outbound call detail records for indicators of illegal robocalling, including:

- Sudden increases in call volume against a Customer's historical baseline.
- High rates of short duration or unanswered calls.
- Spikes in opt-out requests, complaints, or carrier and analytics provider flags.

When activity consistent with illegal robocalling is identified, *healow* contacts the Customer within 24 hours and may pause the Customer's outbound calling until corrective measures are in place. Confirmed violations result in suspension or termination of voice service.

9. Traceback Cooperation

healow cooperates with the FCC, law enforcement and the Industry Traceback Group (ITG) on all traceback requests and investigations and commits to respond fully to traceback requests within 24 hours of receipt. *healow* maintains call records sufficient to identify the originating Customer for any call placed through its platform.

10. International Traffic

healow originates voice traffic for Customers in other countries through its vendors, using numbers local to that country and applies the same vetting and controls described in this Plan. *healow* does not accept or transit traffic from foreign voice service providers for termination in the United States.

11. Robocall Mitigation Contact

Questions, traceback requests and reports of suspected misuse may be directed to:

- Name: Michael Laycob
- Email: incident@healow.com
- Phone: (508) 970-6564
- Address: 2 Technology Drive, Westborough, MA 01581

12. Certification

healow certifies that this Plan is in effect, that it is committed to complying with all FCC requirements regarding robocall mitigation, and that it will maintain and update this certification in the FCC's Robocall Mitigation Database as required.