

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Risk Assessment Policy		
POLICY/PROCEDURE NUMBER	CC-104		
DEPARTMENT	Compliance		
Original Issue Date	8/16/2018		
Next Scheduled Review Date	10/24/2024		
Last Review Date	10/31/2023		
Revision Date History	1/2020 Revised organizational information to apply to all The Smile Way Group; 1/2023 removed DPP subcommittee language in procedures; 3/2023 added SNYO and WA DPP; 10/2023 updated definitions and procedures.		
APPLIES TO			
<input checked="" type="checkbox"/>	SAP: ReachOut Healthcare America Ltd. dba Smile America Partners	<input checked="" type="checkbox"/>	MI: Michigan Dental Outreach, P.C. dba Michigan Dental Outreach
<input checked="" type="checkbox"/>	AZ: Arizona Mobile Dental, PC dba Big Smiles	<input checked="" type="checkbox"/>	MO: Nevin K. Waters D.D.S., P.C. dba Big Smiles
<input checked="" type="checkbox"/>	CA: Elliot Paul Schlang, DDS, Professional Corporation dba Big Smiles	<input checked="" type="checkbox"/>	NC: Theodore F. Mayer, DDS P.A. dba Smile North Carolina
<input checked="" type="checkbox"/>	GA: Shurett Dental Group, P.C. dba Shurett Dental Group	<input checked="" type="checkbox"/>	NY: Big Smiles Dental New York, PLLC
<input checked="" type="checkbox"/>	GA: Mark Shurett, DDS, PC dba Help A Child Smile	<input checked="" type="checkbox"/>	NY: Smile New York Outreach, LLC
<input checked="" type="checkbox"/>	IL: Elliot P. Schlang, D.D.S. P.C. dba Smile Illinois	<input checked="" type="checkbox"/>	OH: Elliot P. Schlang DDS, Dental Outreach PLLC dba Ohio Dental Outreach
<input checked="" type="checkbox"/>	IN: Elliot P. Schlang DDS, Dental Outreach PLLC dba Indiana Dental Outreach	<input checked="" type="checkbox"/>	PA: Big Smiles Pennsylvania P.C. dba Smile Pennsylvania
<input checked="" type="checkbox"/>	KS: Nevin K. Waters D.D.S., PA dba Big Smiles	<input checked="" type="checkbox"/>	UT: Big Smiles Utah, P.C. dba Big Smiles
<input checked="" type="checkbox"/>	KY: Big Smiles Kentucky PSC dba Big Smiles	<input checked="" type="checkbox"/>	VA: Big Smiles Virginia PC dba Smile Virginia
<input checked="" type="checkbox"/>	MA: Elliot P. Schlang DDS Big Smiles Massachusetts P.C. dba Smile Massachusetts	<input checked="" type="checkbox"/>	WA: Michael LaCorte Dentistry, PC dba Big Smiles
<input checked="" type="checkbox"/>	MD: S.K. Pesis D.D.S., Big Smiles Maryland, PC dba Smile Maryland	<input checked="" type="checkbox"/>	WV: Elliot P. Schlang DDS, Inc. dba Smile West Virginia

I. PURPOSE:

This Risk Assessment Policy documents the authority of ReachOut Healthcare America, LTD d/b/a Smile America Partners (“SAP”) and its affiliated Dental Professional Practices (“DPPs”) (hereinafter collectively referred to as “The Smile Way Group” or “the Organization”) to conduct investigations and take actions as required to assess risks to the organization and take mitigating actions to reduce, eliminate, or manage risks. This policy specifies how and when risk assessments will be done and who will be responsible for them.

This annual Risk Assessment Policy is intended to specify the process The Smile Way Group uses to identify risk in order to remediate it. Risk assessments are conducted under the authority of the Chief Compliance Officer, which is shared between SAP and the DPPs. The Chief Compliance Officer works with SAP’s Corporate Compliance Committee (“CCC” or “the Committee”) and the Committee’s DPP Subcommittee on an annual basis to identify and prioritize risks to the company according to likelihood and level of harm factors. All those involved with a risk assessment must fully cooperate with the organizational members conducting the assessment. Cooperation must be complete for both the risk assessment and the remediation process since this is a critical business function.

II. DEFINITIONS:

Risk - The chance that a threat will have an undesirable outcome combined with the amount of harm that may occur.

Risk Assessment - An examination of all possible risks along with implemented and non-implemented solutions to reduce, eliminate, or manage the risk.

Risk Level Threat - A potential incident or activity which may be deliberate, accidental, or caused by nature which may cause physical harm to a person or financial harm to an organization.

Total Risk: A combined measurement of the Risk Level Threat and the Control Level to give a combined assessment of total risk.

III. PROCEDURE:

1. On an annual basis, SAP's Chief Compliance Officer will self-report and identify new or ongoing risks by department or process utilizing a standardized tool developed by the The Office of Inspector General (OIG), Department of Health and Human Services (HHS) and Health Care Compliance Association (HCCA) to assess Compliance Program effectiveness.
2. The Chief Compliance Officer will identify the vulnerabilities faced by The Smile Way Group, evaluate the security controls in place to manage these risks, and identify probabilities of the risk materializing using the risk measurement tool.
3. The Chief Compliance Officer will identify the vulnerabilities within each of the categories of an effective compliance plan and score the Risk Threat Level where possible. Risks identified in the assessment are assigned a risk level threat rating (1-3; 1 - low, 2 - medium, 3 - high) Risks are rated based on inherent threat level, regardless of any controls in place (e.g. as a healthcare provider/organization, PHI breach or improper access will always be an identified high risk). Current mitigating controls that are in place are assessed to reduce or mitigate the identified risk (1-3; 1 - no control, 2 - some control, 3 - strong controls). A Total Risk is calculated by adding Risk Level Threat and Control. This will help when looking at potential cost of controls to reduce the risk. Mitigation and monitoring actions will primarily focus on the top 20 identified risks.
4. The Chief Compliance Officer will present the risk assessment and annual work plan to the Corporate Compliance Committee for review and approval on an annual basis. Once SAP's risk assessment and work plan are reviewed and approved by the Corporate Compliance Committee, the Chief Compliance Officer will review these deliverables and then present them to the Board of Directors upon request.
5. The Corporate Compliance Committee will be apprised on the Mitigation Plan and Actions by the Compliance Officer during Corporate Compliance Committee meetings on a routine basis. These risks and controls will be used to create or enhance the annual Compliance Work Plan of each of The Smile Way Group's entities. The Corporate Compliance Committee will make recommendations and provide support in the Mitigation Plan and Actions.
6. Under the supervision of the Chief Compliance Officer, the Corporate Compliance Department will monitor the effectiveness of risk mitigation actions and document the results. The Smile Way Group will perform the risk assessment process every year in the light of new risks and technologies. Audits, inspections and incidents that occurred over the last year are used to evaluate the effectiveness of the assessment.

Risk assessment reports and findings are confidential.

Approvals:

DocuSigned by:

Steve Higginbotham

11/8/2023

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

11/8/2023

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Craig Thomas, CCO & SVP HR