

# COMPLIANCE POLICY

The Smile Way Group

<b>POLICY/PROCEDURE TITLE</b>	Vendor Management and Oversight Policy		
<b>POLICY/PROCEDURE NUMBER</b>	CC-113		
<b>DEPARTMENT</b>	Corporate Compliance Department		
Original Issue Date	7/19/2018		
Next Scheduled Review Date	02/27/2025		
Last Review Date	02/22/2024		
Revision Date History	10/2022 policy updated to include DPP and The Smile Way Group, updated review frequency, added attestation details; 3/2023 add SNYO & WA DPP.		
<b>APPLIES TO</b>			
<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. POLICY:

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”) aims to protect patients, to comply with the law and ensure compliance with dental contracts. A Vendor Management and Oversight Policy is used to ensure administrative oversight and monitoring of all vendors executing contracts with or on behalf of The Smile Way Group. Smile America Partners serves as a dental services organization for individually owned dental practices. The individually owned DPPs are Covered Entities under HIPAA. Smile America Partners is a Business Associate of these dental practices. As a Business Associate to a Covered Entity, Smile America Partners takes seriously its role in protecting Protected Health Information (“PHI”). This policy establishes a framework for vendor oversight and monitoring. The Corporate Compliance Department monitors key vendors for regulatory and contractual compliance annually. This policy is subject to annual review.

## II. SCOPE:

This policy applies to the oversight of third party vendors who have access to or may have access to PHI and to third party vendors who support or who may support government program work or processes, including, but not necessarily limited to, claims processing services or patient outreach.

## III. PROCEDURE:

- The Smile America Partners Controller is responsible for providing a list of current vendors with whom Smile America Partners does business with to the Corporate Compliance Department on a bi-annual basis, occurring in Quarters 1 and 3 of each fiscal year. The Compliance Department will conduct a bi-annual audit upon the submitted list of current vendors to verify that any required Business Associate Agreement (BAA) are active and resolve any identified deficiencies. The results of the vendor BAA audit will be submitted to the Corporate Compliance Committee bi-annually after completion.

- The Controller will review the list of vendors to determine (1) accuracy and (2) which vendors use, disclose and/or have access to PHI or support government program work or processes.
- Based on the list provided by the Controller, the Corporate Compliance Department will provide annual notices to vendors informing them of its Compliance Program and applicable policies and procedures (the "Vendor Notice").
- Vendors who receive the Vendor Notice are required to provide written acknowledgement of receipt and understanding of Smile America Partners' Compliance Program (the "Attestation").
- From time to time, the Corporate Compliance Department may further evaluate a prospective third-party vendor's compliance program to determine commitment, capability, and cooperation with HIPAA and related laws.
- When the Corporate Compliance Department determines that a vendor is a business associate, the Corporate Compliance Department should follow the process outlined in the Business Associate Agreements policy to ensure that the vendor has signed a Business Associate Agreement (see CC-116 Business Associate Agreements Policy).
- The Corporate Compliance Department maintains a list of Vendor Notices sent out to, and Attestations received from, vendors.

Approvals:

DocuSigned by:

*Steve Higginbotham*

2/26/2024

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Steve Higginbotham, CEO

DocuSigned by:

*Craig Thomas*

2/26/2024

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Craig Thomas, CCO & SVP HR