

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Assessing the Effectiveness of the Corporate Program		
POLICY/PROCEDURE NUMBER	CC-119		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	8/16/2018		
Next Scheduled Review Date	02/22/2024		
Last Review Date	02/23/2023		
Revision Date History	1/2020 Revised organizational information to apply to The Smile Way Group; 2/2023 minor edits		
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:

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”) is committed to a culture of compliance, The Smile Way Group desires to ensure the ongoing effectiveness of its Corporate Compliance Program (“the Program”) and to support improvement efforts and maturation, when needed.

II. POLICY:

SAP’s Corporate Compliance Committee (“CCC”) will annually evaluate the attributes of each individual element of the Corporate Compliance Program to assess the effectiveness of the Program as a whole. As an effective Corporate Compliance Program matures, the principle measure of effectiveness moves from effort to measurable outcomes.

III. PROCEDURE:

The CCC will undertake this process by examining the comprehensiveness of The Smile Way Group’s policies and procedures that have been implemented to satisfy the Corporate Compliance Program elements. Evaluation may be conducted through internal or external auditing mechanisms each year. However, external audits of the Corporate Compliance Program effectiveness will occur no less than once every three years.

Evaluating the effectiveness of the shared Chief Compliance Officer and the CCC is also vital in determining the effectiveness of the Corporate Compliance Program.

It is essential that the Chief Compliance Officer or others, as appropriate, immediately investigate reports or reasonable indications of suspected noncompliance.

The Program is intended to be flexible and readily adaptable to changes in the regulatory requirements and in the health care system as a whole. Any modification or revisions to the Corporate Compliance Program will be communicated to all employees, managers, and, when appropriate, vendors rendering services on behalf of The Smile Way Group.

To facilitate appropriate revisions to the Program, the Chief Compliance Officer will prepare a report to Smile America Partners' Board of Directors, at least annually, that describes the general compliance efforts that were undertaken during the preceding year and that identifies any changes that could be made to improve compliance.

Any revisions to the Corporate Compliance Program require approval by the CCC and Board of Directors for SAP.

Approvals:

DocuSigned by:
Steve Higginbotham 3/9/2023
9F2E17E4D88A41A
Steve Higginbotham, CEO

DocuSigned by:
Craig Thomas 3/9/2023
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Craig Thomas, CCO & SVP HR