

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	OIG Exclusion List Review Policy		
POLICY/PROCEDURE NUMBER	CC-122		
DEPARTMENT	Compliance		
Original Issue Date	08/16/2018		
Next Scheduled Review Date	04/24/2025		
Last Review Date	04/25/2024		
Revision Date History	1/2023 revised organizational information to apply to The Smile Way Group; 3/2023 added SNYO and WA DPP.		
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:

The purpose of this policy is to ensure that 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”) regularly determines whether potential and current employees and subcontractors are excluded from participation in federal healthcare programs, including Medicaid, in compliance with the recommendation of the Department of Health and Human Services Office of Inspector General (the “OIG”). The OIG has the authority to impose civil monetary penalties against excluded individuals and entities that seek reimbursement from federal healthcare programs and healthcare providers that employ or enter into contracts with excluded individuals to provide items or services to federal program beneficiaries.

II. SCOPE:

This policy applies to all persons employed by or subcontracted with The Smile Way Group.

III. POLICY:

The Smile Way Group performs initial and monthly exclusion reviews to ensure all potential employees and subcontractors are eligible to participate in federal healthcare programs and to prevent the hiring of any ineligible person. An ineligible individual is defined as anyone who (1) is currently excluded, debarred, or otherwise ineligible to participate in the federal healthcare programs or in federal procurement or non-procurement program; or (2) has been convicted of a criminal offense related to the provision of healthcare items or services but has not yet been excluded, debarred, or otherwise declared ineligible.

To prevent the hiring of any ineligible individual, the Compliance department screens all individuals whose salary is to be paid in whole or in part, directly or indirectly, by the federal healthcare programs or otherwise with federal funds, prior to engaging their services by requiring applicants to disclose whether they are eligible,

and reviewing the General Services Administration (GSA) List of Parties Excluded from Federal Programs and the HHS/OIG List of Excluded Individuals/Entities (LEIE).

On a monthly basis, the Compliance department also conducts a review of the GSA List of Parties Excluded from Federal Programs and the HHS/OIG LEIE for persons employed by or subcontracted with Smile Way Organization.

If the Compliance Department identifies an individual who is or has become ineligible to participate in federal healthcare programs or in federal procurement or non-procurement programs, the employee or contractor will immediately be relieved from his or her responsibilities.

IV. PROCEDURE:

The Smile Way Group reviews or contracts with a third party for review of the following websites monthly for OIG exclusion:

- <https://exclusions.oig.hhs.gov/>
- <https://sam.gov/content/exclusions>
- Additional state and/or federal exclusion databases may also be reviewed.

The Corporate Compliance Department will track the review and results of all who are employed by or subcontracting with The Smile Way Group.

Approvals:

DocuSigned by:

Steve Higginbotham

7/23/2024

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

7/23/2024

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Craig Thomas, CCO & SVP HR