

POLICY/PROCEDURE TITLE	Effective Communication Policy
POLICY/PROCEDURE NUMBER	CC-110
DEPARTMENT	Corporate Compliance Department
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Approved by:	Corporate Compliance Committee

I. **POLICY:**

ReachOut Healthcare America, LTD d/b/a Smile America Partners (hereinafter “Smile America Partners”) is committed to a culture of compliance. Smile America Partners works to make compliance an inclusive effort by fostering open lines of communication among employees, dental PCs, field staff, and third party vendors, as needed. This policy establishes and implements effective, open lines of communication ensuring confidentiality between the Chief Compliance Officer, members of the Corporate Compliance Committee, employees, managers and governing body, and third party vendors in support of the Compliance Program.

II. **PROCEDURE:**

1. **Lines of Communication:** The Corporate Compliance Department will develop and maintain effective, appropriate lines of communication with key stakeholders of the organization, including, but not necessarily limited to:
 - All levels of management, the Chief Executive Officer, and the Board of Directors
 - Business partners, including dental PCs and field staff, as needed
 - Corporate Compliance Committee
 - Smile America Partners employees at all levels
 - Third party vendors
 - Regulatory authorities
 - From time to time, law enforcement agencies, as needed
2. **Use of the Lines of Communication – Overview:** The Chief Compliance Officer and other Corporate Compliance Department staff will use these lines of communication to effectively communicate information about the Compliance Program, as well as information about laws, regulations, and guidance for Smile America Partners, such as statutory, regulatory, and sub-regulatory changes (e.g. Medicaid updates) and changes to Policies and Procedures and the Code of Conduct.

3. **Communicating Compliance Concerns:** These lines of communication will be openly accessible and allow anonymous and confidential good faith reporting of potential compliance issues as they are identified. See CC-107 Reporting Compliance Concerns Policy for an explanation of communication through the Corporate Compliance Hotline.
4. **Communication with the Chief Executive Officer and Board of Directors:** The Chief Compliance Officer will maintain open lines of communication with the Chief Executive Officer and Board of Directors regarding activities of the Corporate Compliance Committee and Corporate Compliance Department. This includes, but is not limited to the following:
 - The Chief Compliance Officer will provide the Board of Directors a copy of the approved minutes from all Corporate Compliance Committee meetings.
 - Upon ratification by the Corporate Compliance Committee, the Chief Compliance Officer will forward a copy of the annual Compliance Work Plan, and any updates or revisions to the Compliance Program, to the Board of Directors for review and approval.
 - The Chief Compliance Officer will provide the Board of Directors with quarterly reports summarizing key issues and results in the operation of the Corporate Compliance Program. Topics may include but not be limited to:
 - Compliance or Ethics Issues
 - Compliance Inquiries/Incidents
 - Policy and Procedure Status
 - Current Projects
 - Summary of Audits
 - Key Regulation Updates
 - Training and Education Status
 - Other items, as determined
5. **Communication with the Compliance Committee:** As specified in CC-102 Corporate Compliance Program Structure and Oversight – Corporate Compliance Committee, the Corporate Compliance Committee will meet monthly for the purpose of overseeing the Corporate Compliance Program. The Chief Compliance Officer, as Corporate Compliance Committee chair, sets the agenda and keeps/distributes the minutes, with input and approval of the Corporate Compliance Committee. The Chief Compliance Officer will also keep the Corporate Compliance Committee informed and seek its guidance on compliance or ethics issues that represent potential risk to the organization.
6. **Communication with Employees:** The Chief Compliance Officer and Corporate Compliance Committee will maintain open lines of communication with employees at all levels of the organization.

- **Methods of Communication** – Examples of methods of communication with our employees include newsletters, bulletins, emails, meetings, and information posted to DarwiNet.
 - **Compliance Program** – The Corporate Compliance Department will distribute to employees compliance notice cards and contact cards to facilitate knowledge and understanding of the Corporate Compliance Program and ways to anonymously report concerns.
 - **Compliance Program and Code of Conduct** – All employees will receive a copy the Code of Conduct, at the time of employment and upon revision thereafter. Standards of Conduct will be made available to third party vendors identified. Employees shall be required to certify their receipt and understanding and return a signed Acknowledgment at the time of hire.
 - **Training and Education, Incident Reporting** – Employee training and incident reporting are key aspects of organizational communication. These components are addressed in separate Policies and Procedures.
 - **Identifying and Reporting Noncompliance and Fraud, Waste, and Abuse (FWA)** – Smile America Partners will maintain open communication with employees, to educate these individuals on identifying and reporting noncompliance FWA, as appropriate.
7. **Issues Tracking Log:** The Corporate Compliance Department tracks compliance violations and issues and disseminate them to the appropriate manager to respond and resolve.
 8. **Communication with Contracted Entities and Dental PCs:** The Chief Compliance Officer and Corporate Compliance Committee will develop and utilize mechanisms for communicating with contracted entities, including healthcare providers and management service organizations. Such communication will typically occur in collaboration with Smile America Partners departments or committees having established methods of contractor communication.
 9. **Communication with Regulatory Authorities:** Smile America Partners will maintain open communication with regulatory authorities. The Chief Compliance Officer serves as one of the organization’s main points of contact with regulatory authorities. As such, the Chief Compliance Officer should be included on communications or notices of information or inquiries relating to regulatory inquiries, investigations, or complaints.