

<b>POLICY/PROCEDURE TITLE</b>	Assessing the Effectiveness of the Corporate Program
<b>POLICY/PROCEDURE NUMBER</b>	CC-119
<b>DEPARTMENT</b>	Corporate Compliance Department
Original Issue Date	August 16, 2018
Next Scheduled Review Date	August 1, 2019
Last Review Date	August 16, 2018
Revision Date History	N/A
Author:	N/A
Approved by:	Corporate Compliance Committee

### **I. PURPOSE:**

To ensure the ongoing effectiveness of the ReachOut Healthcare America LTD d/b/a/ Smile America Partners (hereinafter "Smile America Partners") Corporate Compliance Program and to support improvement efforts and maturation, when needed.

### **II. POLICY:**

The Corporate Compliance Committee will annually evaluate the attributes of each individual element of the Smile America Partners Corporate Compliance Program to assess the effectiveness of the Corporate Compliance 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 Corporate Compliance Committee will undertake this process by examining the comprehensiveness of Smile America Partners 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 Smile America Partners' Chief Compliance Officer and the Corporate Compliance Committee 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 Corporate Compliance 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, members of the dental staff, vendors, and field staff rendering services on behalf of Smile America Partners.

To facilitate appropriate revisions to the Corporate Compliance 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 Smile America Partners' governing body.