

POLICY/PROCEDURE TITLE	OIG Exclusion List Review Policy
POLICY/PROCEDURE NUMBER	CC-122
DEPARTMENT	Corporate Compliance Department
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Author:	N/A
Approved by:	Corporate Compliance Committee

I. PURPOSE:

The purpose of this policy is to ensure that ReachOut Healthcare America LTD d/b/a Smile America Partners (hereinafter "Smile America Partners") 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 Smile America Partners, including field staff and dentists who are employed by or subcontracting with Smile America Partners' partnering dental practices.

III. POLICY:

Smile America Partners 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 America Partners, including field staff and dentists who are employed by or subcontracting with Smile America Partners' partnering dental practices.

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:

Smile America Partners 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/SAM/pages/public/searchRecords/search.jsf>

The Corporate Compliance Department will track the review and results of all who are employed by or subcontracting with Smile America Partners and the partnering dental practices.