

# COMPLIANCE POLICY

The Smile Way Group

<b>POLICY/PROCEDURE TITLE</b>	Responding to Government Inquiries and Investigations or Other Requests for Information Policy		
<b>POLICY/PROCEDURE NUMBER</b>	CC-115		
<b>DEPARTMENT</b>	Corporate Compliance Department		
Original Issue Date	9/20/2018		
Next Scheduled Review Date	10/26/2023		
Last Review Date	3/09/2023		
Revision Date History	10/2022 policy updated to include DPP and The Smile Way Group, updated CCO contact information, guidance clarified by government and payer requests; 3/2023 added SNYO & WA DPP		
<b>APPLIES TO</b>			
<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:

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”) personnel are aware of and understand the importance of effective communication and proper documentation when receiving and responding to government inquiries and investigations or other lawful requests for information.

## II. SCOPE:

This policy applies to all government inquiries and investigations or other lawful requests for information received either directly or indirectly by any and all personnel of The Smile Way Group.

## III. POLICY:

The Smile Way Group will cooperate fully with all appropriate government inquiries and investigations. It is The Smile Way Group’s intent to respond to inquiries in a complete, timely, and properly coordinated manner so that the rights of those parties involved are protected.

Examples of state or federal agencies that may make inquiries include, but are not limited to, the following:

- State Dental Boards
- State Medicaid Programs
- Medicaid Fraud Control Units
- State Departments of Health
- State Attorneys General Offices

From time to time, the government may request information relating to The Smile Way Group. Such contact may occur either directly or indirectly.

The Smile Way Group's personnel who has been contacted, informed, notified, or otherwise made aware of a government inquiry or investigation or other lawful request for information must immediately notify the Chief Compliance Officer. The Chief Compliance Officer is responsible for response oversight, coordination, and communication, including but not limited to oversight of communications with the DPPs for which Smile America serves as the administrator.

When contacted in person by a government investigator, the personnel should ask to see proper identification and must politely inform the investigator that the interview can proceed once legal counsel is present. The personnel must immediately notify the Chief Compliance Officer of the presence of the government investigator.

In instances where personnel are contacted by a government investigator via written, telephonic, or electronic form or receive notice of a government inquiry or investigation personnel must immediately notify the Chief Compliance Officer. Personnel should receive directive from the Chief Compliance Officer prior to fulfilling requested release of records or information related to a government investigation.

In instances where personnel are contacted by other lawful requests for information from another party, such as a Payor, DPP, or legal counsel or law firm, personnel should proceed in fulfilling the request. All requests must be documented in accordance with departmental procedures.

Types of contact may include, but are not necessarily limited to:

- Direct in person
- Telephone
- Email or facsimile
- U.S. Postal Service or common carrier delivery
- Payor inquiry
- Dentist owned PC inquiry
- Legal counsel or law firm

All written documents received whether in hard copy or electronic form must be provided to the Chief Compliance Officer. Personnel may take basic information such as name, title, telephone and email contact information and general reason for the inquiry from a government investigator or other third party in order to provide this information directly to the Chief Compliance Officer only.

To notify the Chief Compliance Officer regarding government inquiries and investigations or other lawful requests for information:

Craig Thomas  
[cthomas@mobiledentists.com](mailto:cthomas@mobiledentists.com)  
888.833.8441 ext. 21115 Office  
480.785.6098 Mobile

Approvals:

DocuSigned by:  
  
3/10/2023  
9F2E17E4D88A41A  
Steve Higginbotham, CEO

DocuSigned by:  
  
3/24/2023  
068E2D1B7A624EC  
Craig Thomas, CCO & SVP HR