

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Designated Record Set		
POLICY/PROCEDURE NUMBER	CC-125		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	1/26/2023		
Next Scheduled Review Date	1/25/2024		
Last Review Date	3/09/2023		
Revision Date History	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:

To set forth the policy and procedure of 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") to establish guidelines for the definition and content of the Designated Record Set ("DRS"). The DRS contains information that the patient can access or amend under federal, state, and local laws. The DRS may also be requested by a patient/patient's personal representative, payer, and/or Dental Board.

II. POLICY:

DRS is defined as a group of records (paper or electronic) maintained by The Smile Way Group that is:

- the medical and billing records about patients maintained by or for The Smile Way Group
- the enrollment, payment, claims adjudication, and case or medical management record systems maintained by The Smile Way Group; and/or
- used, in whole or in part, by The Smile Way Group to make decisions about patients.

DRS Includes:

The following consist of the DRS and can be released with proper authorization:

- Patient Permission Form / Consent Form / "Flyer"; this may include the Profile for full verbal consent
- Secondary consent record
- Patient Chart / Treatment Record
- Take Home Sheet / Post Op Treatment Instructions
- Medical images (e.g. X-Rays)
- Billing and payment records (e.g. Ledger)
- Case Management History or Referral to outside dentists
- Patient Communications
- Patient Grievances

DRS Does Not Include:

The following are not part of the DRS, even if they include PHI, because they are not used to make health care decisions about a patient.

- Miscellaneous Files
- Risk management records
- Quality assessment records
- Credentialing records
- Peer review files
- Incident report
- Internal Grievance reports
- Information contained in employee records
- Coding queries
- Internal compliance reports, audits, and logs
- Administrative records
- Attorney-client privileged records, or any other record that is subject to privilege under state and/or federal laws and regulations
- Information compiled in reasonable anticipation or, or for use in civil, criminal, or administrative action or proceeding
- Temporary notes or worksheets
- Business Associates
- Clinical Outcome data
- Research
- External/Outside Medical Records
- Grant / Charity Care Forms
- Any other record that is not used to make health care decisions about the patient

Approvals:

DocuSigned by:

Steve Higginbotham

3/9/2023

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

3/24/2023

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Craig Thomas, CCO & SVP HR