

COMPLIANCE POLICY

The Smile Way Group

POLICY/PROCEDURE TITLE	Corporate Compliance Training and Education (New Hires and Annual)		
POLICY/PROCEDURE NUMBER	CC-106		
DEPARTMENT	Corporate Compliance Department		
Original Issue Date	7/19/2018		
Next Scheduled Review Date	10/24/2024		
Last Review Date	10/31/2023		
Revision Date History	11/2019 Revised organizational information to apply to all The Smile Way Group; 3/2023 added SNYO & WA DPP; 10/2023 minor edits		
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:

The purpose of this policy is to ensure that employees, management, and third party vendors 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” or “the Organization”) are informed, educated, and aware of applicable laws, regulations, and internal standards of conduct regulating and applicable to Smile America Partners’ company environment and operations.

II. SCOPE:

Compliance training and education is provided to all of The Smile Way Group within 90 days of their hire date and on at least an annual basis thereafter.

III. POLICY:

The Corporate Compliance Department has developed comprehensive training and education to ensure that employees throughout the organization are aware of the standards that apply to them. Additional compliance training in areas of compliance risk (e.g., billing, coding, accurate medical record documentation) is required of certain individuals.

All ethics and compliance training is required to be tracked and recorded in The Smile Way Group’s electronic record keeping system. Resources regarding The Smile Way Group’s compliance program, including the Code of Conduct, will be available to all employees electronically. The Smile Way Group encourages all employees to review the resources available to them, as needed.

IV. PROCEDURE:

The Smile Way Group requires all employees to attend training, including appropriate training in federal and state statutes, regulations and guidelines, and corporate ethics.

Training programs include sessions highlighting the Compliance Program and summarizing various compliance standards, including fraud and abuse statutes and regulations, confidentiality, federal, state, and private payer healthcare program requirements, and marketing practices that reflect current legal and Compliance Program standards. The Smile Way Group's compliance training consists of Initial Training, Annual Refresher Training, quarterly Compliance Communications, and Ad Hoc Compliance Training. The Smile Way Group will take steps to effectively communicate its standards and procedures to all affected employees, independent contractors, and other significant agents, e.g., by requiring participation in training programs and disseminating publications that explain specific requirements in a practical manner. Managers of specific departments or groups may assist in identifying areas that require training and in carrying out such training. Training instructors may come from outside or inside the organization.

A variety of teaching methods, such as interactive training and training in different languages, when necessary and appropriate to properly educate a culturally diverse staff, will be implemented so that all employees are knowledgeable about The Smile Way Group's standards of conduct and procedures for alerting the Corporate Compliance Officer to problems and concerns. Targeted training will be provided to corporate officers, managers, and other employees whose actions affect the accuracy of the claims submitted to governmental agencies. All training materials will be designed to take into consideration the skills, knowledge, and experience of the individual trainees.

As part of the Initial Training, the Code of Conduct will be distributed to all employees. At the end of the initial training session, every employee attendee will be required to sign and date a statement that reflects the employee's knowledge of and commitment to the standards of conduct. This attestation will be retained in the employee's personnel file. Further, any employee handbook delineating or expanding upon these standards of conduct will be regularly updated as applicable statutes, regulations, and federal healthcare program requirements are modified.

Attendance and participation at training programs are a condition of continued employment, and the failure to comply with training requirements may result in disciplinary action, up to and including termination of employment. Adherence to the provisions of the Compliance Program, such as training requirements, will be a factor in the evaluation of each employee. The Smile Way Group will retain adequate records of its training of all employees.

Approvals:

DocuSigned by:

Steve Higginbotham

11/8/2023

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Steve Higginbotham, CEO

DocuSigned by:

Craig Thomas

11/8/2023

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Craig Thomas, CCO & SVP HR