


PLAN OPERATIONS	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Verification of Services	Policy ID:	PLANCG-91
	Approved By:	Regulatory Compliance Committee	Last Revision Date:	04/15/2026
	States:	Oregon	Last Review Date:	04/29/2026
Application:	Medicaid	Effective Date:	04/30/2026	

PURPOSE

To ensure billed services have been rendered and to identify potential FWA occurrences.

POLICY

All complaints and grievances that indicate a concern of services billed but not rendered must be sent to FWAReporting@advantagedental.com. If the FWA Reporting Department is not able to validate that the services(s) billed were rendered, the department will submit an FWA Referral to the applicable CCO within seven (7) days and promptly notify Corporate Compliance and Corporate Legal. The FWA Reporting Department will work with the applicable CCO on corrective actions. The FWA Reporting Department will track, monitor and report out on all concerns of services billed but not rendered at the Dental Subcontractor’s monthly Regulatory Compliance Committee meeting to identify trends and mitigate fraudulent billing.

PROCEDURE

A. Member Services Department:

- a. Expressions of dissatisfaction.
 - i. If a member contacts the Member Services Department to express dissatisfaction through a complaint or requests to file a formal grievance, the Member Services Department shall do the following as it relates to concerns regarding services being billed but not rendered:
 - 1. The Member Services Department will ask the member if they wish to file a formal grievance.
 - a. If the member does wish to file a formal grievance, the Member Services Department will offer the member the option of submitting a verbal grievance or a written grievance. If the member elects a verbal grievance, the Member Services Department will record the verbal grievance on the OHP 3001 Form and send it to the Grievance Department for processing. If the member elects a written grievance, the Member Services team will send the member an OHP 3001 Form in the mail or advise the member where the form can be found online and provide instructions on how the form should be submitted to the Grievance Department.
 - b. If the member does not wish to file a formal grievance, the Member Services Department will assist the member with the concern regarding services being billed but not rendered by attempting to validate if the service(s) was provided through claim verification.
 - i. If the Member Services Department is able to confirm the service(s) was provided and the member recalls that the service(s) was provided and is no longer concerned, the Member Services Department will document the conversation in the member’s record and also send a copy of the correspondence to the Grievance Department for tracking. Once the Grievance

Department has completed its tracking, all related correspondence will be sent to the FWA Reporting Department.

- ii. If the Member Services Department is not able to validate the service(s) and/or the member maintains the service(s) was not provided, the Member Services Department will send a copy of the correspondence to the Grievance Department and the Grievance Department will investigate the complaint through its standard process, but without the regulatory steps that include sending the member a grievance acknowledgment letter and a grievance resolution letter, and notifying the CCO through regulatory reporting. Once the Grievance Department has completed its investigation, all related correspondence will be sent to the FWA Reporting Department.

1. The FWA Reporting Department will review the investigation information.

- a. If the investigation information indicates that the services(s) billed were not rendered, the FWA Reporting Department will submit an FWA Referral to the applicable CCO within seven (7) days and promptly notify Corporate Compliance and Corporate Legal. The FWA Reporting Department will work with the applicable CCO on corrective actions and will retain the information for tracking, monitoring and reporting.
- b. If the investigation information does not indicate that the service(s) billed were not rendered, the FWA Reporting Department will promptly notify Corporate Compliance and Corporate Legal and will retain the information for tracking, monitoring and reporting.

b. Verification of Services (VOS) program.

- i. To identify potential FWA occurrences, the Dental Subcontractor maintains a VOS program. The Member Services Department sends VOS forms to all members that received a dental service during the prior month. Returned VOS forms are generated into call lists for the Member Services Department. If a member indicates on a returned VOS form that they did not receive a service(s), the Member Services Department will reach out to the member to see if the member wants to file a formal grievance. The Member Services Department will make three call attempts to contact the member within 7(seven) days, reaching out on different days and at different times..

1. If the member does not respond after the third contact attempt, the Member Services Department will notify the Grievance Department and the Grievance Department will investigate the complaint through its standard process, but without the regulatory steps that include sending the member a grievance acknowledgment letter and a grievance resolution letter, and notifying the CCO through regulatory reporting.

- a. The Grievance Department will make one additional call attempt to contact the member.

- i. If the member responds, the Grievance Department will inquire if the member wants to file a formal grievance.

1. If the member does want to file a formal grievance, the Grievance Department will follow its standard grievance process. Once the Grievance Department has resolved the grievance, all grievance related documentation (acknowledgement letter, resolution letter, supporting documentation) will be sent to the FWA Reporting Department. The documents must be sent to the FWA Reporting Department on the same date that the grievance resolution letter is sent to the member.
 - a. The FWA Reporting Department will follow the process outlined in section A.a.i.1.b.ii.1 of this policy.
 2. If the member does not respond to the outreach attempt by the Grievance Department or does respond and declines to file a formal grievance, the Grievance Department will investigate the complaint through its standard process, but without the regulatory steps that include sending the member a grievance acknowledgment letter and a grievance resolution letter, and notifying the CCO through regulatory reporting. Once the Grievance Department has completed its investigation, all related correspondence will be sent to the FWA Reporting Department.
 - a. The FWA Reporting Department will follow the process outlined in section A.a.i.1.b.ii.1 of this policy.
2. If the Member Services Department is able to connect with the member, the department will ask the member if they would like to file a formal grievance.
- a. If the member does want to file a formal grievance, the Member Services Department will follow the process outlined in section A.a.i.1.a of this policy.
 - b. If the member does not wish to file a formal grievance, the Member Services Department will assist the member with the concern regarding services being billed but not rendered by attempting to validate if the service(s) was provided through claim verification.
 - i. If the Member Services Department is able to confirm the service(s) was provided and the member recalls that the service(s) was provided and is no longer concerned, the Member Services Department will document the conversation in the member's record and also update the entry on the call list and mark it as "Survey Updated – No Grievance Needed" for Grievance Department tracking. Once the Grievance Department has completed its tracking, all related correspondence will be sent to the FWA Reporting Department.
 - c. If the Member Services Department is not able to validate the service(s) and/or the member maintains the service(s) was not provided, the Member Services Department will follow the process outlined in section A.a.i.1.b.ii.

B. Grievance Department

- a. For all grievances that indicate concerns of service(s) billed but not rendered, the Grievance Department must send all grievance related documentation (acknowledgement letter, resolution letter, supporting documentation) to the FWA Reporting department. The documents must be sent to the FWA Reporting Department on the same date that the grievance resolution letter is sent to the member and the grievance is marked as resolved. The Grievance Department will select the “Copy to FWA Investigation” option so that a copy of the case is added to the FWA Investigation cases for tracking and reporting.
 - i. The FWA Reporting Department will review the investigation information.
 - 1. If the investigation information indicates that the services(s) billed were not rendered, the FWA Reporting Department will submit an FWA Referral to the applicable CCO within seven (7) days and promptly notify Corporate Compliance and Corporate Legal. The FWA Reporting Department will work with the applicable CCO on corrective actions and will retain the information for tracking, monitoring and reporting.
 - 2. If the investigation information does not indicate that the service(s) billed were not rendered, the FWA Reporting Department will promptly notify Corporate Compliance and Corporate Legal and will retain the information for tracking, monitoring and reporting.

FORMS AND OTHER RELATED DOCUMENTS

OHP Grievance Form (OHP 3001)

Revision History

Date:	Description
04/29/2026	Approval and adoption.