


DCO OPERATIONS	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Chief Ethics & Compliance Officer; Corporate Compliance Committee	Policy ID:	PLANCG-79
	Approved By:	Advantage Dental Services, LLC Compliance Committee	Last Revision Date:	10/05/2021
	States:	Oregon	Last Review Date:	11/30/2021
Application:	Medicaid	Effective Date:	12/01/2021	

PURPOSE

This policy is the description and reporting responsibility of the Chief Ethics & Compliance Officer.

POLICY

DentaQuest, the parent company of Advantage Dental Services, LLC, a Dental Care Organization (DCO), has established the position of Chief Ethics & Compliance Officer (CECO) who is responsible for overseeing and monitoring implementation of the Compliance Program, which reviews and evaluates compliance issues and concerns within the organization relating to federal and state health care programs. The CECO ensures focus on compliance with the rules and regulations of regulatory agencies, compliance with Company policies and procedures, and assurance that behavior in the organization follows the Company's standards of conduct. The CECO has direct access to the organization's leadership and other management and legal counsel and reports directly to the Audit Committee of the Board of Directors.

To assist the CECO, DentaQuest has established the Corporate Compliance Committee, charged with the responsibility and authority of operating and monitoring the Compliance Program and who report directly to the Chief Executive Officer and governing body. The DCO has also established a Compliance Committee with respect to its Oregon Medicaid line of business. This Committee reports to the Corporate Compliance Committee and includes representation from the CECO, senior level management employees and member(s) of the Board of Directors.

REFERENCES

- CMS Managed Care Manual Chapter 21
- CMS Prescription Drug Benefit Manual Chapter 9
- 42 C.F.R. §§ 422.503(b)(4)(vi)(B), 423.504(b)(4)(vi)(B)

DEFINITIONS

“DCO” or “Company” includes the corporate DentaQuest parent organization and all of its subsidiary entities.

FORMS AND OTHER RELATED DOCUMENTS

- DentaQuest Corporate Compliance Committee Charter
- DCO Compliance Committee Charter
- DentaQuest Compliance Program Description

Revision History

Date:	Description
3/2/2015	Updates driven by the recommendations from the 2014 Compliance Program Assessment.
5/11/2016	Updates based on annual review.
4/26/2017	Updates based on annual review.
8/14/2017	Revised Chief Compliance Officer to read Chief Ethics & Compliance Officer.
2/27/2018	Conversion to revised policy and procedure format and naming convention.
5/14/2018	Policy revision: clear and concise description of responsibilities.
11/12/2018	Corporate Compliance Committee approval
11/10/2020	DCO Compliance Committee approval
06/09/2021	Updates based on annual review.
10/05/2021	Updates based on annual review.