


DCO OPERATIONS	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Corrective Action Plan Management	Policy ID:	PLANCG-73
	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 describes a framework by which the Company coordinates and responds to external audits and reviews requiring Corrective Action Plan (CAP).

POLICY

It is the Company’s policy to ensure coordination and implementation of timely, effective actions when there is an identified and agreed upon need for improved performance, in order to allow continued adherence to statutory and contractual obligations and guidelines.

DEFINITIONS

“**Corrective Action Plan**” means a formally defined process intended to the Company back into compliance with performance standards established by statute, regulation, or contractual agreement during which, for a specified period of time, restrictions can be imposed. This policy does **not** consider CAPs related to individual workforce members’ performance, which are managed by operational area and Human Resources (HR).

PROCEDURE

A. CAP Identification and Development

Corrective Action Plans (“CAPs”) are developed after completion of either a scheduled client audit or a communication received from a client unrelated to a scheduled review process which specifies:

- 1) an action that the Company must take to correct the finding of deficiency;
- 2) identifies the department responsible for developing the solution/action; and
- 3) the date by which the correction will be completed.

B. Internal CAP Monitoring

The Compliance Department sends regular inquires to all business owners and responsible workforce members involved with the resolution of items identified for CAP response, in order to monitor the status of CAPs and the Company’s progress toward implementation and resolution of issues identified for corrective action.

The Compliance Department will escalate CAPs being monitored that do not appear to be moving towards resolution to the Chief Ethics & Compliance Officer, to be addressed with the management team of the responsible business owners in order to bring those CAPs to completion.

Revision History

Date:	Description
-------	-------------

7/12/2018	Policy drafted
7/19/2018	Compliance updates
11/12/2018	Corporate Compliance Committee approval
11/25/2019	Annual Review
11/10/2020	DCO Compliance Committee approval
10/5/2021	Updates based on annual review.