


DCO OPERATIONS	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Enforcement and Discipline	Policy ID:	PLANCG-75
	Approved By:	Advantage Dental Services, LLC Compliance Committee	Last Revision Date:	10/5/2021
	States:	Oregon	Last Review Date:	11/30/2021
Application:	Medicaid	Effective Date:	12/01/2021	

PURPOSE

To ensure that employees and/or subcontractors knowingly, willfully, or repeatedly violate Company policies and/or engage in noncompliant behavior, the Dental Care Organization (DCO) will ensure appropriate disciplinary processes exist for all levels of Team Members, contracted vendors and individuals. When it becomes necessary, the Compliance Department will work with the Human Resources Department and any other impacted business unit, with respect to the discipline. are subject to the same types of disciplinary action for similar offenses because the commitment to compliance applies to all personnel within an organization.

POLICY

It is the DCO's policy to ensure that knowing, willful, or repeatedly violate Company policies and noncompliant behavior is responded to in an appropriate fashion; and that employees, contractors, vendors and individuals are subject to appropriate and progressive discipline. Sanctions can include but are not limited to oral warnings, written warnings, corrective action plans, suspension or termination from employment or service.

REFERENCES

- Ref. 42 C.F.R. §§ 422.503(b)(4)(vi)(E), 423.504(b)(4)(vi)(E)
- 42 C.F.R. § 438.603
- CMS Managed Care Manual Chapter 21
- CMS Prescription Drug Benefit Manual Chapter 9

DEFINITIONS

- **DCO:** This term includes the corporate DentaQuest parent organization and all of its subsidiary entities.
- **Team Member:** The term "Team Member" includes any officers, employees, independent contractors, Board of Director members and subcontractors (downstream entities) and any other interested party of the DCO.

PROCEDURE

- Each situation is considered on a case-by-case basis to determine the appropriate response. Appropriate DCO management has a responsibility to discipline Team Members, vendors or individuals in an appropriate and consistent manner and is held accountable for failing to comply with the applicable standards, contractual obligations, policies and procedures.

- B. Managers and supervisors may be disciplined for failing to adequately instruct their staff or failing to detect noncompliance with applicable policies and legal requirements where reasonable diligence would have led to the discovery of violations.
- C. The DCO does not delegate such responsibilities to individuals or entities that it knows has a propensity to engage in inappropriate or improper conduct. The DCO's policies prohibit the hiring of individuals or entities who have been recently convicted of a criminal offense related to health care or who are listed as debarred, excluded, or otherwise ineligible for participation in federal health care programs.
- D. All contracted vendors and individuals must comply with all DCO confidentiality policy and procedure.

Revision History

Date:	Description
3/7/2016	Updates based on annual review.
8/14/2017	Retired policy 1200.017 Disciplinary Actions. Incorporated relevant content.
2/27/2018	Conversion to revised policy and procedure format and naming convention.
11/12/2018	Corporate Compliance Committee approval
11/22/2019	Updates based on annual review.
11/10/2020	DCO Compliance Committee approval
06/09/2021	Updates based on annual review.
10/05/2021	Updates based on annual review.