


COMPLIANCE	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Enforcement and Discipline	Policy ID:	PLANCG-75
	Approved By:	Courtney Barnes Ransom, Head of Risk Management, Ethics & Compliance	Last Revision Date:	02/03/2026
	States:	Oregon	Last Review Date	03/25/2026
Application:	Medicaid	Effective Date:	03/26/2026	

PURPOSE

To ensure that for employees and/or subcontractors that knowingly, willfully, or repeatedly violate Company policies and/or engage in noncompliant behavior, Advantage Dental Services 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 to ensure that Team Members, contracted vendors, and individuals are subject consistent disciplinary action for similar offenses because the commitment to compliance applies to all personnel within an organization.

POLICY

It is Advantage Dental Services policy to ensure that knowing, willful, or repeatedly violate The Dental Subcontractor policies and noncompliant behavior is responded to in a case-by-case and consistent manner; 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

- 42 C.F.R. §§ 422.503(b)(4)(vi)(E), 423.504(b)(4)(vi)(E)
- 42 C.F.R. § 438.603
- Medicare Managed Care Manual, Chapter 21

DEFINITIONS

- **Advantage Dental Services:** This term includes the corporate Advantage Dental Services 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 Advantage Dental Services.

PROCEDURE

- A. Appropriate Advantage Dental Services 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. Advantage Dental Services does not delegate such responsibilities to individuals or entities that it knows has a propensity to engage in inappropriate or improper conduct. Advantage Dental Services’ 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. Advantage Dental Services may identify a list of factors that will be considered before disciplinary action will be imposed. Such factors may include degree of intent, amount of financial harm to the company or the government or whether the wrongdoing was a single incident or lasted over a long period of time.

- E. All contracted vendors and individuals must comply with all Advantage Dental Services confidentiality and disciplinary action policies and procedures.

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	Dental Subcontractor Compliance Committee approval
06/09/2021	Updates based on annual review.
10/05/2021	Updates based on annual review.
12/31/2022	Updates based on annual review.
11/27/2023	Updates based on annual review.
09/27/2024	Updates based on annual review.
02/03/2026	Updates based on annual review.