


<b>COMPLIANCE</b>	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	<b>Compliance Officer; Corporate Compliance Committee</b>	Policy ID:	<b>PLANCG-79</b>
	Approved By:	Courtney Barnes Ransom, Head of Risk Management, Ethics & Compliance	Last Revision Date:	02/21/2025
	States:	Oregon	Last Review Date:	03/25/2026
Application:	Medicaid	Effective Date:	02/26/2025	

## PURPOSE

This policy is the description and reporting responsibility of the Head of Risk Management, Ethics & Compliance (Compliance Officer).

## POLICY

Advantage Dental Services has established the position of Head of Risk Management, Ethics & Compliance (Compliance Officer) 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 Compliance Officer 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 Compliance Officer has direct access to the organization’s leadership and other management and legal counsel and reports directly to the Quality and Compliance Committee of the Board of Directors, of which the organization’s Chief Executive Officer is an attendee.

To assist the Compliance Officer, Advantage Dental Services has established the Compliance Committee, charged with the responsibility and authority of operating and monitoring the Compliance Program and who report directly to the Vice President of Operations and governing body.

The Head of Risk Management, Ethics and Compliance (Compliance Officer) maintains an open-door policy to allow individuals to report problems and concerns as well as answering routine questions regarding compliance and/or ethics issues.

The Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, or any other individual operating in these roles, may not operate in the capacity of Compliance Officer

## 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)
- 42 C.F.R. § 438.608(a)(1)(ii)(v)

## DEFINITIONS

“**Advantage Dental Services**” or “**Company**” includes the corporate Advantage Dental Services parent organization and all of its subsidiary entities.

***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.
12/31/2022	Updates based on annual review.
9/05/2023	Updates based on annual review.
02/21/2025	Updates based on annual review.
02/03/2026	Annual review, no changes.