


<b>COMPLIANCE</b>	 From DentaQuest			
	<i><b>Policy and Procedure</b></i>			
	Policy Name:	<b>Annual Attestations; Certificates of Compliance</b>	Policy ID:	<b>PLANCG-77</b>
	Approved By:	Courtney Barnes Ransom, Head of Risk Management, Ethics & Compliance	Last Revision Date:	9/5/2023
	States:	Oregon	Last Review Date	11/30/2023
Application:	Medicaid	Effective Date:	12/1/2023	

## **PURPOSE**

This policy establishes an outline for tracking the submission of compliance attestations or certifications of compliance, including guidelines for the appropriate delegation of signature and approval authority, which will serve as a certification that Advantage Dental Services meets all applicable regulatory and compliance requirements.

The review and approval process is handled by the Head of Risk Management, Ethics & Compliance (Compliance Officer) or their designee with consultation from the Legal Department, but does not relieve any operational department from ensuring that any unusual or unique attestations are properly reviewed and authorized by appropriate levels of senior management.

## **POLICY**

It is Advantage Dental Services' policy to affirm timely and appropriate compliance with statutory and regulatory obligations through the completion of routine, annual attestations.

This policy applies to all Advantage Dental Services employees (e.g., Compliance Program staff, Client Engagement, Audit Team, and operational department employees), whether full-time, temporary, contractor or part-time. Independent contractors and consultants do not have the authority to bind the organization and should consult a member of the Compliance or Legal department if they receive an attestation request. Any employee who signs an attestation that he or she is not authorized to sign can be held personally liable for the commitment.

## **PROCEDURE**

Upon receipt of an attestation or certification of compliance, all employees are required to send the form to a member of the Compliance Department for review. The Compliance Officer or their designee will review the requirements of the attestation and work to ensure all sections of the attestation that pertain to regulatory compliance, are executed in a timely fashion to meet the Health Plan's deadline.

Given the extensive variety of attestations required for Advantage Dental Services' business operations, determination of appropriate signature authority and related requirements can be complex. All operational department employees should be aware that the authority to execute attestations depends on the nature and complexity of the Health Plan Client agreement and undertake appropriate consultation with other departments to ensure completeness and accuracy.

***Revision History***

Date:	Description
3/27/2017	Original policy 1200.024 drafted
2/27/2018	Conversion to revised policy and procedure format and naming convention
11/12/2018	Corporate Compliance Committee approval
11/18/2019	Revised as part of annual review process
11/10/2020	DCO Compliance Committee approval
10/5/2021	Updates based on annual review.
12/31/2022	Updates based on annual review.
9/5/2023	Updates based on annual review.