

What is compliance?

SIMPLY PUT, compliance is abiding by state and federal laws and regulations and our own internal policies and procedures. Compliance means we act responsibly to protect the business, our staff and the people we serve.

It is the individual responsibility of every Smile America Partners team member to address compliance questions or concerns.



Identifying a compliance issue

Determining if you have a compliance issue can be complex. Follow the checklist below to help identify a compliance issue.

- *Is the action legal?*
 - Examples: Violations of law, regulation or code of conduct, including Medicaid, falsifying documents, accounting/auditing issues
- *Does the action comply with Smile America Partners' policies and procedures?*
 - Examples: Environmental, health, and safety concerns
- *Is the action fair and honest?*
 - Examples: Financial fraud, including bribery, corruption, and gifts

Reporting options

We follow an open-door policy and encourage you to bring any compliance issues to our attention. Where to best raise a concern will depend on the issue and the situation. You have at least three options:

- Discuss the issue with an immediate supervisor.
- Discuss the issue with a higher-level manager or director.
- Call the **Compliance Helpline at 800.447.9207** if you feel uncomfortable discussing your concerns in person. The **24/7** helpline is an external line that is both confidential and anonymous. The line does not have caller ID.



Compliance concerns or questions?

CALL 800.447.9207
COMPLIANCE HELPLINE

24/7 • Confidential • Anonymous

SMILE AMERICA[®]
PARTNERS

The Smile Way - Policies

Below is an overview of four key policies that contribute to The Smile Way and how we do business.

SEE SOMETHING, SAY SOMETHING!

As a member of the team, you have a responsibility to maintain the highest ethical standards. As such, you have an obligation to report concerns about possible violations of any applicable law, regulation or Smile America Partners' policy or procedure. When in doubt, report all good-faith concerns. It's The Smile Way! (See back for reporting options.)

NO PENALTY ZONE!

You will never be penalized for reporting compliance concerns in good faith. We have a zero tolerance stance on retaliation, which is defined as any action, statement, or behavior that is designed to punish an individual for filing a compliance report, cooperating with a compliance investigation, seeking guidance regarding a compliance concern or to deter one from taking such action. If you have a compliance concern, get in the game, and speak up.



CLEARING THE CLUTTER

One person's organization is another person's clutter. Because we handle sensitive and protected health information (PHI) in our every day course of business, we need to take every reasonable step to protect it. That includes keeping your workstation free of PHI at the end of every day. All sensitive information should be filed or otherwise concealed. Clutter free is the way to be!

Examples of PHI/PII include:

- Name
- Any geographical identifiers smaller than a state (city, town, ZIP)
- Dates (other than year) directly related to an individual
- Phone/fax numbers
- Email addresses
- Social Security numbers
- Medical record numbers
- Health insurance beneficiary numbers



KNOCK, KNOCK. WHO'S THERE? A LITTLE PRIVACY, PLEASE!

Because we handle sensitive and confidential information (health records, personal identification data, credit card numbers, etc.), we must be ever vigilant in protecting it. This includes taking every reasonable step to limit access to sensitive information to only those team members who need it to do their jobs. Even the most welcome visitors to our workplace should remain in common areas or be accompanied by a Smile America Partners team member.

Remember,
rules are **NOT** made to be broken.
COMPLIANCE MATTERS!