


DCO OPERATIONS	 From DentaQuest			
	<i>Policy and Procedure</i>			
	Policy Name:	Availability of the Code of Conduct and Ethics Standards	Policy ID:	PLANCG-70
	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

This policy outlines the process for Advantage Dental Services, LLC, a Dental Care Organization (DCO), to ensure that DCO Personnel, which include officers, employees, independent contractors, Board members and subcontractors (downstream entities), and other interested parties are aware of the required conduct as detailed in the Code of Conduct & Ethics (“Code of Conduct”) and set forth the policy and procedure for Code of Conduct distribution. The policy does not replace existing policy and procedure but rather serves as a reference guide for all Personnel to understand where to go to find the Code of Conduct to fully understand their compliance obligations.

The Standards of Conduct, detailed in the Code of Conduct, is the vehicle for establishing general principles that guide DCO operations. Compliance with the Code of Conduct is required by all DCO Personnel.

POLICY

The DCO is committed to full compliance with all statutes, regulations, and guidelines applicable to commercial, federal, state, health plan programs and employment law. The Code of Conduct guides the organization’s actions, decisions, and operations by describing the standards to behave in an ethical manner. The DCO will make the Code of Conduct available to all Personnel through various avenues.

REFERENCES

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

DEFINITIONS

- **“DCO or Company”** includes the corporate DentaQuest parent organization and all of its subsidiary entities.
- **“Personnel”** includes any officers, employees, independent contractors, Board of Director members and subcontractors (downstream entities) and any other interested party of the DCO.

PROCEDURE

- A. The DCO Code of Conduct sets out responsibilities and rights of all DCO Personnel. The Code of Conduct will be made available to DCO Personnel in the following ways:
 - 1. The Code of Conduct is posted and available on the DCO Intranet for all employees to review and download.
 - 2. The Code of Conduct will be reviewed, and revised as necessary, by the Corporate Compliance Committee and the Audit and Compliance Committee of the Board annually.
 - 3. On an annual basis, subcontractors and providers will be provided a copy of the Code of Conduct and required to attest to either having comparable documentation or complying with the DCO Code of Conduct.
- B. All DCO Personnel are required to complete the General Compliance Training and Code of Conduct Training, which includes a course on compliance expectations embodied in the Standards of Conduct.
- C. The Code of Conduct is part of Code of Conduct training and includes the completion of an acknowledgement of receipt, review and acceptance of the Code of Conduct in order to receive full credit for the training.
- D. Failure to comply with the Code of Conduct Standards, including other DCO policies and procedures, may subject an employee, Board member or entity to disciplinary action, up to and including termination.

Revision History

Date:	Description
2/20/2015	Updates driven by the recommendations from the 2014 Compliance Program Assessment.
3/8/2016	Added "Ethics" to the description of the policy.
4/27/2017	Updates based on annual review.
2/27/2018	Conversion to revised policy and procedure format and naming convention.
11/12/2018	Corporate Compliance Committee approval
11/10/2020	ADS Compliance Committee approval
10/05/2021	Updates based on annual review.