
	Policy No.: 1	Signature: 	
	Created: 1/2007	Reviewed: 5/2018	Revised: 3/2017

DUTIES OF COMPLIANCE PERSONNEL

PURPOSE:

Envision Healthcare (“Envision”) has adopted this Duties of Compliance Personnel policy to provide an overview of the responsibilities the Ethics & Compliance Department has to ensure Envision and its subsidiaries operate within the parameters of all applicable healthcare laws and regulations.

POLICY AND PROCEDURE:

I. INTRODUCTION

The Envision Ethics & Compliance Officer is charged with overseeing the overall administration of Envision's Ethics & Compliance Program. The Chief Compliance Officer may be assisted by Compliance Directors, Managers, Generalists and administrative personnel (collectively referred to as "Ethics & Compliance Personnel".)



Envision's Board of Directors has delegated authority to the Ethics & Compliance Personnel to undertake and comply with these responsibilities and to have open access to senior management and to the Board of Directors. Envision senior management has also appointed an Executive Compliance Committee, which shall oversee the operation of Envision’s Ethics & Compliance Program.

II. ETHICS & COMPLIANCE PERSONNEL

Chief Compliance Officer

The Chief Compliance Officer shall be responsible for directing and supervising the compliance functions at Envision, its subsidiaries and affiliates (“the Company”), and all aspects of the development, execution, monitoring and achievement of Envision’s Ethics & Compliance Program. The Chief Compliance Officer shall:

- Oversee the implementation and entire administration of the Company’s Ethics & Compliance Program;
- Develop programs to educate and train employees with respect to the Company’s Ethics & Compliance Program;

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- Ensure that all employees are complying with the Company's Ethics & Compliance Program;
- Ensure that any potential violations or irregularities are promptly investigated and addressed;
- Perform or review due diligence work as it applies to the billing practices of target companies;
- Conduct research on trends in third party reimbursement, including, but not limited to, Medicare and Medicaid;
- Be available to discuss, confidentially, employee concerns regarding compliance with the law and the Company's operating policies and procedures;^{1/}
- Oversee both internal reviews and reviews performed by outside professional firms; and
- Assist management in communicating with the Medicare carriers, and federal or state agencies to discuss reimbursement issues.

Compliance Personnel

Compliance personnel shall assist the Chief Compliance Officer in all tasks, including:

- Assisting with programs to educate and train all employees with respect to Envision's Ethics & Compliance Program;
- Evaluating the adequacy and effectiveness of management controls over billing, and the effectiveness and efficiency of the billing workflow;

^{1/}All conversations with employees will be kept confidential to the maximum extent consistent with the fair and rigorous enforcement of the Company's Corporate Ethics & Compliance Program.



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- Performing or assisting in reviews of various aspects of Envision's operations and presenting findings to the Chief Compliance Officer, who shall then present the findings to the Envision Executive Compliance Committee;
- Appraising the adequacy of any corrective action taken to improve deficient or problematic conditions or processes;
- Preparing and conducting periodic educational programs on third party reimbursement;
- Overseeing preparation of responses to Carrier audit requests;
- Discussing, confidentially, employee concerns regarding compliance with the law and the Company's operating policies and procedures;
- Maintaining a log of various compliance issues; and
- All other tasks as the Chief Compliance Officer directs.

III. GENERAL DUTIES OF ALL ETHICS & COMPLIANCE PERSONNEL

The Envision Ethics & Compliance Personnel are responsible for the following activities within the organization:

- Compliance reviews of the following:
 - Communications procedures
 - Operational procedures
 - RTI/RCM/Central Billing Offices
 - Excluded employee screens
 - Fraud and abuse issues
 - Laws and regulations impacting the healthcare industry
 - Other areas of potential non-compliance
- Monitor outside investigations/audits of all billing and operational procedures.
- Implement and conduct employee training.
- Monitor the Envision Ethics & Integrity Helpline.

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- Conduct Exit Interviews with former employees.
- Investigate areas of potential non-compliance.
- Track, monitor and update management on new/revised federal and state regulations that affect the healthcare industry.

The Ethics & Compliance Department has developed and implemented specific policies to address the activities listed above. Please refer to the specific policy for more details.

IV. POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy and all HIPAA policies when necessary in the normal course of its review of the Corporate Ethics & Compliance Program.