 <b>Envision</b> HEALTHCARE — PIONEERING THE DELIVERY OF CARE —	Policy No.: 1	
	Created: 1/2007	Reviewed: 8/2019

## DUTIES OF COMPLIANCE PERSONNEL

ETHICS & COMPLIANCE DEPARTMENT

### PURPOSE:

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

### POLICY AND PROCEDURE:

#### I. INTRODUCTION


The Envision Chief Compliance Officer is charged with overseeing the overall administration of Envision's Ethics & Compliance program (the “Ethics & Compliance Program”). The Chief Compliance Officer may be assisted by Compliance Directors, Managers, Associates 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 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 administration of the Company’s Ethics & Compliance Program which shall include:
- Developing programs to educate and train employees with respect to the Company’s Ethics & Compliance Program;

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- Promptly investigating and addressing potential violations or irregularities are promptly investigated and addressed;
- Overseeing the Disclosure Program;
- Performing or reviewing due diligence work as it applies to the billing practices of target companies;
- Conducting 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;<sup>1</sup>
- Oversee both internal reviews and reviews performed by outside professional firms; and
- Assist 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;
- 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

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<sup>1</sup>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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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 payer 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 Envision Chief Compliance Officer directs.

### **III. GENERAL DUTIES OF ALL ETHICS & COMPLIANCE PERSONNEL**

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

- Compliance reviews shall include:
  - Communications procedures
  - Operational procedures
  - RTI/RCM/Central Billing Offices
  - Excluded provider screens
  - Fraud and abuse issues
  - Laws and regulations impacting the healthcare industry
- Monitor outside investigations/audits of all billing procedures.
- Implement and conduct employee training.
- Monitor the Envision Ethics & Integrity Compliance Helpline.
- Conduct Exit Interviews with former employees.

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- 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 when necessary in the normal course of its review of the Company's Ethics & Compliance Program.