	Policy No.: 13		
	Created: 8/2019	Reviewed:	Revised:

COMPLIANCE INVESTIGATIONS

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all Envision Healthcare colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

To outline the procedures for responding to and investigating all reported potential violations of law, regulation, policy, or the Code of Business Conduct & Ethics (the “Code”) of Envision Healthcare and its subsidiaries and affiliates (the “Company”) to be followed by the Company’s Ethics & Compliance Department.


POLICY AND PROCEDURE:

I. INVESTIGATIONS

The Company is committed to investigating all reported concerns and allegations of misconduct promptly and confidentially to the extent possible. The Ethics & Compliance Department coordinates any findings from investigations and, when appropriate, implements corrective action. All Company colleagues who provide false information, refuse to cooperate during an investigation, or who attempt to interfere with an investigation, will be subject to disciplinary action, up to and including termination from employment.

The Ethics & Compliance Department will review the reported concerns and/or allegations of misconduct and determine if additional information is necessary to investigate. If additional information is required, the reporter, if identified, will be contacted to obtain the additional information. If the reporter is anonymous, the Ethics & Compliance Department will make reasonable efforts to obtain additional information from the reporter.

The Ethics & Compliance Department will review the reported concerns and/or allegations of misconduct and determine the issue(s) raised. Based upon this review, the Ethics &

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Compliance Department will determine whether the matter requires the knowledge and expertise of other Company colleagues or departments to perform an effective investigation. The Ethics & Compliance Department will refer the matter to other Company departments, as appropriate.

Matters involving allegations of criminal or civil liability to the Company, threatened litigation or any government inquiry will be referred to the Legal Department for review and investigation. The Legal Department will be responsible for coordinating any and all responses to such legal processes. See the Company’s Responding to Government Investigations policy for more information.

For any reported concerns and/or allegations of misconduct referred to another department for investigation, the applicable department will conduct an investigation to evaluate the facts and existence of credible evidence supporting the allegation. That department will notify the Ethics & Compliance Department of any regulatory impact and corrective actions taken related to the substantiated allegations.


For all reported concerns and allegations of misconduct, the Ethics & Compliance Department will maintain a record of material information, including, but not limited to, a summary of issues raised, a summary of investigative findings, and any corrective action taken to address substantiated allegations.

II. CORRECTIVE ACTION

If an investigation substantiates a reported concern and/or allegation of misconduct, the Company will initiate corrective action, including, but not limited to, making prompt restitution of any government overpayment amounts, notifying the appropriate governmental agency, and implementing changes to prevent similar occurrences in the future.

If the Ethics & Compliance Department determines that a colleague has clearly violated Company policy or the Code, that colleague shall be subject to appropriate corrective action, up to and including termination from the Company.

In addition to any internal corrective action taken, the Company will comply with all applicable reporting requirements arising from any substantiated allegations.

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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.