

	Policy No.: 16		
	Created: 4/2003	Reviewed: 8/2019	Revised: 8/2019

COMPLIANCE EDUCATION AND TRAINING

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:

The purpose of this document is to provide guidance for colleagues of Envision Healthcare and its subsidiaries and affiliates (the “Company” or “Envision”) on the mandatory compliance education and training program.

POLICY:

The Company is committed to providing ongoing education and training on the Envision Healthcare Code of Business Conduct & Ethics, Compliance Program policies and procedures, coding and billing standards, healthcare laws, federal and state statutes, regulations and guidelines for all Envision colleagues. Additionally, this policy outlines the education and training requirements for those Envision Physician Services colleagues who participate in the development, management, review and/or approval of “Arrangements” and “Focus Arrangements,” as those terms are defined in the Corporate Integrity Agreement between Envision and the Office of Inspector General which was effective as of December 15, 2017 (the “CIA”). All colleagues are required to complete compliance training upon hire (“New Hire Compliance Training”) and on an annual basis thereafter (“Annual Compliance Training”) as outlined below.

Colleagues shall be informed during training sessions that compliance with the Company’s Ethics & Compliance Program and the Code of Conduct is a condition of employment or engagement and that compliance with the Ethics & Compliance Program and the Code of Conduct is one of the criteria upon which colleagues will be evaluated. Failure to complete a training session conducted pursuant to the Ethics & Compliance Program may result in disciplinary procedures, up to and including discharge or termination.

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PROCEDURE:

A. New Hire Compliance Training

1. Each colleague is required to complete the following compliance courses within 60 days of his/her date of hire:
 - a. General Compliance Training
 - b. HIPAA Training

Additional courses may be assigned based on a colleague’s identified business segment, job description and/or job responsibilities. Colleagues who do not complete the required new hire compliance training may be subject to disciplinary action up to and including termination.

2. Compliance training will be assigned through one of the Company’s learning management systems, as applicable – Healthstream or Relias (“LMS”). Upon hire, a colleague will receive log in credentials as well as instructions for accessing the training via the LMS. General questions regarding compliance training should be directed to the Ethics & Compliance Department at 615-922-6125.

B. Annual Compliance Training

Colleagues will receive updated compliance training on an annual basis. Information regarding the required annual compliance training will be communicated to Company leadership and colleagues who will have at least 60 days to complete the required annual compliance training.

Colleagues who do not complete the required annual compliance training may be subject to disciplinary action up to and including termination.

C. Arrangements and Focus Arrangements New Hire and Annual Training (For Envision Physician Services Colleagues)

Company has implemented training for clinicians and non-clinicians who are currently involved in the development, review and/or approval of Arrangements and Focus Arrangements. Colleagues must complete mandatory education which provides an overview of the Anti-Kickback Statute as it relates to Company’s business. In addition, colleagues must receive adequate training on arrangements that potentially implicate the Anti- Kickback Statute, as well as the regulations and other guidance documents related to the statute. The training will also provide a detailed review of Company’s policies, procedures and other requirements relating to Arrangements and Focused Arrangements,

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including but not limited to the Focused Arrangements Tracking System, the internal review and approval process, and the tracking of remuneration to and from sources of health care business or referrals. Additional training will be provided on the personal obligation of each individual involved in the development, approval, management or review of Company’s Arrangements, so he or she understands the applicable legal requirements and Company’s policies and procedures, as well as the legal sanctions under the Anti-Kickback Statute, and including examples of violations of the Anti-Kickback Statute.

D. Other Training.

Colleagues also may be required to participate in other mandatory training sessions. These sessions are in addition to those conducted by Ethics & Compliance personnel pursuant to the Ethics & Compliance Program. Envision management and department heads are responsible for appropriately communicating, documenting and implementing new/revised billing regulations and/or Company policies. Department Directors and Managers are also responsible for disseminating information to colleagues and independent contractors regarding new/revised regulations or policies. Written documentation may also be provided to reinforce understanding.

E. Management Responsibility for Training.

Managers and supervisors are responsible for ensuring adherence to the Company’s Ethics & Compliance Program by colleagues under their supervision. In this regard, it is the responsibility of every manager and/or supervisor to distribute all compliance guidance and revised training materials to their teams promptly upon receipt of the material. They must also inform their subordinates regarding the requirements of, and compliance with, the Ethics & Compliance Program, as applicable. Supervisors and Managers are expected to maintain an open line of communication with their colleagues in which concerns can be reported and addressed without fear of retaliation. Managers and supervisors who fail to meet these requirements or fail to detect non-compliance with applicable policies and legal requirements, where reasonable diligence on the part of the manager or supervisor would have led to the discovery of any problems or violations and given Envision an opportunity to correct them earlier, may be subject to disciplinary procedures, up to and including discharge or termination.

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.