

COMPLIANCE EDUCATION AND TRAINING

SCOPE:

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

PURPOSE:

Envision Healthcare and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Compliance Education and Training policy to provide guidance for teammates 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 (*Vital Signs*), Compliance Program policies and procedures, coding and billing standards, healthcare laws, federal and state statutes, regulations, and guidelines for all Envision teammates. All teammates are required to complete compliance training upon hire (“New Hire Compliance Training”) and on an annual basis thereafter (“Annual Compliance Training”) as outlined below.

Teammates 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 teammates 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.

	Ethics & Compliance Department	
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PROCEDURE:

A. New Hire Compliance Training

1. Each teammate is required to complete the following compliance courses within sixty (60) days of his/her date of hire (or first shift date, whichever is later):
 - a. Code of Business Conduct and Ethics
 - b. General Compliance Training
 - c. HIPAA Training

Additional courses may be assigned based on a teammate’s identified business segment, job description, and/or job responsibilities. Teammates 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 the Company’s learning management system (“LMS”). Upon hire, a teammate 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

Teammates will receive updated compliance training on an annual basis. Information regarding the required Annual Compliance Training will be communicated to Company leadership and teammates who will have at least sixty (60) days to complete the required Annual Compliance Training.

Teammates who do not complete the required Annual Compliance Training may be subject to disciplinary action up to and including termination.

C. Other Training.

Teammates may also 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 teammates regarding new/revised regulations or policies. Written documentation may also be provided to reinforce understanding.

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D. Management Responsibility for Training.

Managers and supervisors are responsible for ensuring adherence to the Company’s Ethics & Compliance Program by teammates 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 teammates 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 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.