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|  Envision HEALTHCARE — PIONEERING THE DELIVERY OF CARE — | Policy No.: 14 | |
| | Created: 1/2000 | Reviewed: 1/2020 |

OVERPAYMENTS AND REFUNDS TO THE GOVERNMENT

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all Envision Healthcare Corporation colleagues associated with the billing and coding process. 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 establish a process for Envision Healthcare Corporation and its subsidiaries and affiliates (the “Company”) to refund identified and quantified overpayments to the government, as required by law and regulation,

POLICY:

The Company shall report and return any overpayment to the government within 60 days of identification. Identification of an overpayment is determined when the Company has, or should have through the exercise of reasonable diligence, determined that the Company has received an overpayment and quantified the amount of the overpayment, in accordance with the federal regulations and applicable guidance. After identification of an overpayment, remedial steps shall be taken within 90 days to correct the problem which caused the overpayment and prevent the underlying problem and overpayment from recurring.

An overpayment is any governmental reimbursement amount that an entity receives or retains to which the Company is not entitled. Examples include payment for non-covered services; payments greater than the allowable amount; and payments made when the amount is made by a governmental payor as the primary insurance carrier when, in fact, the governmental payor should have paid secondary to another payment source.

PROCEDURE:

1. The Ethics & Compliance Department may receive notification of a potential overpayment to the government through a number of ways, including, without limitation: (i) through the review of billing or payment records under which incorrectly coded services result in increased reimbursement; (ii) learning that services were provided by an unlicensed or excluded individual on its behalf; (iii) performing audits; and, (iv) being informed by a government agency of an audit that discovered a potential overpayment.

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2. The Ethics & Compliance Department, along with the appropriate personnel with operational or billing responsibility for the areas involved, will engage in or facilitate a review, with the exercise of reasonable diligence, and engage other relevant parties with substantive knowledge of the issue and the Legal Department, as needed, to determine if an overpayment has been identified.
3. If an overpayment is identified, reporting and repayment to the government will be coordinated with the applicable department within 60 days of identification, as described above.
4. The Company will take remedial steps within ninety (90) days of identification to attempt to correct the problem which caused the overpayment, in order to prevent the underlying problem and overpayment from recurring.
5. If an underpayment error is identified, the Company may request additional payment, as permissible.

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.