

	Ethics & Compliance Department	
	Policy No.: 116	Created: 10/2019
		Reviewed: 05/2023
	Revised:	

MANAGEMENT CERTIFICATIONS

SCOPE:

Applies to all Envision Medical Group 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 Management Certifications policy to outline Envision Medical Group’s (“EMG”) policy and process for obtaining compliance certifications from certain EMG leadership (“Certifying Employees”).

POLICY:

Certifying Employees are expected to monitor and oversee activities within their areas of authority and shall annually certify that the applicable Company department is in compliance with applicable Federal health care program requirements. These Certifying Employees shall be determined by the executive leadership team, as described below. Each Certifying Employee shall sign a certification that states:

“I have been trained on and understand the compliance requirements and responsibilities as they relate to [insert name of department], an area under my supervision. My job responsibilities include ensuring compliance with regard to the [insert name of department] with all applicable Federal health care program requirements and Company policies, and I have taken steps to promote such compliance. To the best of my knowledge, the [insert name of department] of Envision is in compliance with all applicable Federal health care program requirements.

If any Certifying Employee is unable to provide such a certification, the Certifying Employee shall provide a written explanation of the reasons why he or she is unable to provide the certification outlined above.

PROCEDURE:

On an annual basis, the Ethics & Compliance Department will work with the executive leadership team to identify all teammates who will be required to certify that year.

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Once the Certifying Employees have been identified, the Ethics & Compliance Department will distribute the certifications for execution. Completion of the certifications will be tracked by the Ethics & Compliance Department which will ensure all certifications are executed and received.

POLICY REVIEW:

The Ethics & Compliance Department will review and update this Policy, as necessary, in the normal course of its review of the Company’s Ethics & Compliance Program.