

	Ethics & Compliance Department	
	Policy No.: 201	Created: 01/2000
		Reviewed: 05/2023
	Revised: 08/2019	

RELATIONSHIPS WITH BILLING ENTITIES

SCOPE:

Applies to all Envision Medical Group (“EMG”) teammates. For purposes of this policy, all references to “teammate” or “teammates” include temporary, part-time and covered persons, full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

Envision Healthcare and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Relationships with Billing Entities policy to provide guidance on the requirements for the use of external billing entities.

POLICY:

All work performed by external consultants must conform to the Company’s policies and procedures.

PROCEDURE:

External reimbursement, coding, and billing consultants may be used in the following situations:

- When the Company’s internal coding or billing operations are at capacity and cannot be increased with available staff.
- Post acquisition, we continue to utilize the coding or billing operation of the previous owner until internal coding or billing operations is able to increase capacity and/or develop expertise in a new market.
- Our internal coding or billing operations is unable to handle the current workload due to staff vacancies or other priorities.

Payment Arrangements

- For Government Payors, our consultants may be compensated by an hourly fixed rate, a fixed fee, or a combination of an hourly rate and a fixed fee.
- Private payor claims may be based on a percentage of collection of fees, fixed fee, or hourly rate.

The practices of external companies may deviate from those of the Company (for example, a billing or collection agreement where reimbursement is based on a percentage of amounts billed or collected). However, the agreement must provide for the deposit of all Medicare payments

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into a bank account in the name of and controlled by the provider. If the parties desire, the provider may direct that any funds in the bank account be transferred to another bank under another party’s control, so long as the provider may modify or revoke the transfer order at anytime.

All contracts or fee letters, regardless of what the external consultant is used for and how he/she is compensated, are subject to final approval by the Legal Department. At a minimum, the contracts must include the following:

- The contract termination period should be clearly outlined and should not exceed one hundred eighty (180) days.
- Specific language regarding errors and omissions and the consultants’ responsibility must be clearly outlined.
- Language regarding confidentiality and retention of records.
- The requirement to notify EMG of compliance issues, government investigations, training and education programs, and results of compliance audits.

The contract or fee letter will state that it is the responsibility of the consultant to notify the Company of all findings (coding discrepancies, etc.). It is the responsibility of the Company to then ensure that all findings are reported to the billing department regardless of whether such findings are favorable or detrimental to the Company.

Before contracting with an external consultant to provide services related to Medicare and any other third-party payor, the minimum standards addressed below must be verified. If a company newly acquired by the Company is under contract with a consulting firm, the Ethics & Compliance Department must verify the minimum standards. At a minimum, a consultant must:

- Be aware of the Company’s Ethics & Compliance Program and relevant internal coding and billing policies applicable to the consultant’s assignment.
- Not be excluded from the Medicare and Medicaid Programs or under investigation for a Program violation.
- Not be a former employee of the Company who was terminated from the Company’s employment, “for cause”.
- Demonstrate their qualifications or experience to perform such services being performed.
- Provide information for the Ethics & Compliance Department to verify the consulting entity has an effective Compliance Program including an adequate Ethics and Compliance Education and Training Program.

A list of select consulting sources, which are believed to meet the minimum standards addressed above, can be obtained from the Ethics & Compliance Department.

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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.