

	Ethics & Compliance Department		
	Policy No.: 201	Created:	01/2000
		Reviewed:	06/2026
		Revised:	08/2019

RELATIONSHIPS WITH EXTERNAL BILLING VENDORS

SCOPE

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

PURPOSE

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Relationships with External Billing Vendors Policy to provide guidance on the requirements for the use of external billing vendors.

POLICY

All work performed by external reimbursement, coding and/or billing vendors (“External Billing Vendors”) must conform to the Company’s policies and procedures.

Payment Arrangements

- For Government Payors, External Billing Vendors 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 into a bank account in the name of and controlled by the entity that contracts with clinicians to provide services. If the parties desire, the contracting entity may direct that any funds in the bank account be transferred to another bank under another party’s control, so long as the contracting entity may modify or revoke the transfer order at anytime.

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The contract will state that it is the responsibility of the External Billing Vendor to notify the Company of all material findings identified through the External Billing Vendor's quality assurance or audit processes. It is the responsibility of the Company to then ensure that any material findings are reported to the Company's Revenue Cycle Management team regardless of whether such findings are favorable or detrimental to the Company.

Before contracting with an External Billing Vendor to provide reimbursement, coding and/or billing services for claims submitted to Medicare and any other third-party payor, the minimum standards addressed below must be verified. If the Company acquires an entity that is under contract with an External Billing Vendor, the Ethics & Compliance Department must verify the External Billing Vendor minimum standards. At a minimum, an External Billing Vendor must:

- Be aware of the Company's Ethics & Compliance Program and relevant internal coding and billing policies applicable to the External Billing Vendor assignment
- Not be excluded from the Medicare and Medicaid Programs or under investigation for a violation of the federal healthcare program
- Not be (or employ) a former clinician or teammate of the Company who was terminated from the Company's employment, "for cause"
- Demonstrate their qualifications or experience to perform such services being performed.

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.