

	Ethics & Compliance Department		
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		Reviewed:	06/2026
		Revised:	01/2020

OVERPAYMENTS AND REFUNDS TO THE GOVERNMENT

SCOPE

Applies to all Envision clinicians and teammates associated with the coding and billing process. 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 Overpayments and Refunds to the Government Policy to establish a process for 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 sixty (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 ninety (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

The Ethics & Compliance Department may receive notification of a potential overpayment to the government through a number of ways, including, without

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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.

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.

If an overpayment is identified, reporting and repayment to the government will be coordinated with the applicable department within sixty (60) days of identification, as described above.

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.

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.