

	Ethics & Compliance Department		
	Policy No.: 305	Created:	01/1999
		Reviewed:	06/2026
		Revised:	09/2022

SUSPENSION OF THE MEDICAL RECORD

SCOPE

Applies to all Envision clinicians and teammates associated with the billing and coding process in any way. 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 Suspension of the Medical Record Policy to establish the procedure to be followed by the Company’s Revenue Cycle Management team (“RCM”) and external reimbursement, coding and/or billing vendors (“External Billing Vendors”) regarding the suspension of medical records for the purpose of obtaining additional information necessary for coding and billing.

POLICY/PROCEDURE

RCM and External Billing Vendors will submit claims for clinicians’ services based **only** on the clinician’s documentation in the chart. The clinician’s documentation must support the services provided to the patient. The chart must be signed and dated by the clinician who performed the medical services. The original chart is the property of the hospital where the services were rendered. The chart provided to RCM and/or External Billing Vendors is a copy of the original chart. Any documentation updated by the clinician subsequent to the initial completion of the original chart must be signed and dated by the clinician and labeled as an “ADDENDUM”.

RCM and/or External Billing Vendors will only suspend a medical record to request additional information from the hospital and/or clinician under certain circumstances. The claim must be coded using **only** the information included on the original chart, which may have a properly noted addendum per above, and the original chart must be signed and dated by the clinician who performed the services prior to submitting a claim for payment. The clinician must document only those services

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rendered to the patient. RCM and/or External Billing Vendors should not request the clinician to alter a chart (except as permitted in this policy), nor should the clinician alter a chart or record false information. Any of these actions are subject to disciplinary action up to and including termination.

The charts may be suspended to request additional information from the hospital and/or clinician that was excluded from RCM and/or the External Billing Vendor's copy of the chart. Outlined below are the **primary** reasons why RCM and/or External Billing Vendors will suspend charts and request additional information from the hospital and/or clinician. The addition of information is at the clinician's discretion and RCM and/or External Billing Vendors should not request the clinician to add the additional information if he/she is not amenable to doing so.

- Signature missing.
- Dictation/clinician notes missing.
- Supervising clinician co-signature missing.
- Clear copy needed.
- Clinical record missing/material page(s) missing.
- Other as appropriately set forth by the Ethics & Compliance Department's policies and procedures.

The reason stated "Other" should only be used for specific requests for which no other description applies. Approval by an RCM Vice President or above must be obtained prior to using the "Other" category. Exceptions will be determined on a case-by-case basis. For questions specifically related to Advanced Practice Provider charts, please reference the Billing for Services provided by an Advanced Practice Provider Policy.

The Company's RCM or External Billing Vendors shall not request additional information if there is insufficient documentation for history, physical exam and medical decision making.

In addition to the primary reasons outlined above, the following suspend reasons have also been approved by the Ethics & Compliance Department:

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Elements of Non-Time-Based Anesthesia Procedures

The following criteria must be met in order to utilize this suspend reason:

- The record **MUST** clearly indicate that a non-time-based procedure was performed in addition to time-based anesthesia services; AND
- ANY requested elements **MUST NOT** rely solely on the clinician's recollection of the encounter.

Any questions regarding this policy may be directed to your supervisor or the Ethics & Compliance Department.

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.