

	Policy No.: 115		
	Created: 10/2019	Reviewed:	Revised:

## REPORTABLE EVENTS

ETHICS & COMPLIANCE DEPARTMENT

### **SCOPE:**

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

### **PURPOSE:**

The purpose of this policy is to outline Envision Physician Services’ (the “Company”) obligations for reporting Reportable Events per the requirements of the Corporate Integrity Agreement (the “CIA”).

### **POLICY:**

All colleagues are required to abide by the reporting requirements in accordance with the Code of Business Conduct and Ethics, *Vital Signs*, and Policy 3: Reporting Potential Issues or Areas of Non-Compliance. In addition to these requirements, colleagues are required to report all suspected Reportable Events outlined below.

The CIA defines a Reportable Event as any event involving:

- a substantial Overpayment;
- a matter that is reasonably considered a probable violation of criminal, civil, or administrative laws applicable to any Federal health care program for which penalties or exclusion may be authorized;
- the employment of or contracting with a Covered Person who is an Ineligible Person; or
- the filing of a bankruptcy petition by the Company.

A Reportable Event may be the result of an isolated event or a series of occurrences.

### ***Duty to Report***

Colleagues are expected to report any suspected Reportable Event to their supervisor, manager, or a member of the Ethics & Compliance Department. Any manager, supervisor, or other colleague who receives notification of a potential or confirmed Reportable Event will contact a member of the Ethics & Compliance Department. Upon receipt of the suspected Reportable Event, the Ethics & Compliance Department will immediately begin a detailed investigation.

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The Ethics & Compliance Department must consult the guidelines listed below for ensuring all Reportable Events are reported timely and in accordance with the CIA requirements. If, after a reasonable opportunity to conduct an appropriate review or investigation of the allegations, the Company determines that a Reportable Event exists, the Company will notify the OIG in writing within 30 days of making said determination.

Colleagues who are aware of potential Reportable Events and fail to report the violations to the Company may be subject to discipline.

### ***Substantial Overpayments***

An Overpayment is the amount of money the Company has received in excess of the amount due and payable under any Federal health care program requirements. A substantial Overpayment is a Reportable Event. Notification to the OIG will include:

- a complete description of all details relevant to the Reportable Event, including, at a minimum, the types of claims, transactions, or other conduct contributing to the Reportable Event;
- the period during which the conduct occurred;
- the names of entities and individuals believed to be implicated, including an explanation of their roles in the Reportable Event;
- the affected Federal health care programs;
- a description of the steps taken by the Company to identify and quantify the Overpayment; and
- a description of the Company's actions taken to correct the Reportable Event and prevent it from recurring.

Within 60 days of identifying a Substantial Overpayment, the Company will repay the Overpayment to the payor. Additionally, the Company will provide the OIG with a copy of the notification and quantified repayment to the payor. Notification and repayment to the payor will be done in accordance with the payor's policies.

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***Probable Violations of Criminal, Civil, or Administrative Law Applicable to Federal Health Care Programs***

A matter that is reasonably considered a probable violation of criminal, civil, or administrative laws applicable to any Federal health care program for which penalties or exclusion may be authorized is a Reportable Event. Notification to the OIG must include:

- a complete description of all details relevant, including, at a minimum, the types of claims, transactions or other conduct contributing to the Reportable Event;
- the period during which the conduct occurred;
- the names of entities and individuals believed to be implicated, including an explanation of their roles in the Reportable Event;
- a statement of the Federal criminal, civil or administrative laws that are probably violated by the Reportable Event;
- the affected Federal health care programs;
- a description of the Company' s actions taken to correct the Reportable Event and prevent it from recurring; and
- if the Reportable Event has resulted in an Overpayment, a description of the steps taken by the Company to identify and quantify the Overpayment.

***Employment of or Contracting with an Ineligible Covered Person***

The employment of or contracting with a Covered Person who is an Ineligible Person is a Reportable Event. Notification to the OIG must include:

- the identity of the Ineligible Person and the job duties performed by that individual;
- the dates of the Ineligible Person's employment or contractual relationship;
- description of the Exclusion Lists screening that the Company completed before and/or during the Ineligible Person's employment or contract and any flaw or breakdown in the Ineligible Persons screening process that led to the hiring or contracting with the Ineligible Person;
- a description of how the Reportable Event was discovered; and

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- a description of any corrective action implemented to prevent future employment or contracting with an Ineligible Person.

***Filing a Bankruptcy Petition***

Filing a bankruptcy petition by the Company is a Reportable Event. Notification to the OIG must include documentation of the bankruptcy filing and a description of any Federal health care program authorities implicated.

**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.