	Policy No.: 108	
	Created: 1/2000	Reviewed: 9/2020

COMPLIANCE & INTEGRITY COMMITTEE POLICY
ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all members of the Compliance & Integrity Committee. 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:


Although it is the responsibility of all colleagues and companies within Envision Physician Services to comply with the Company’s Ethics & Compliance Program, Envision Physician Services has adopted this Compliance & Integrity Committee Policy in order to establish a committee of executive management personnel to have primary responsibility of the Ethics & Compliance Program. Day-to-day administrative responsibilities are assigned to Envision Physician Services’ Chief Compliance Officer (CCO).

POLICY AND PROCEDURE:

Responsibilities of the Compliance & Integrity Committee

The Committee’s responsibilities will include:

- Ensuring the proper evaluation and response to ethical and regulatory issues and concerns.
- Recommending and monitoring educational and teaching activities to ensure standards and procedures are reasonably capable of reducing improper conduct.
- Reviewing the quarterly coding audits, which are conducted by an outside consulting firm to ensure they are performed according to the compliance monitoring and auditing policy, as well as ensuring all auditing issues are properly addressed.
- Reviewing and revising compliance policies to ensure the standards are consistent with regulatory requirements.
- Assessing results of external reviews to determine the accuracy of overpayments identified and discuss the Company’s appeal rights related to overpayments for which the Company does not agree.
- Analyzing reports of misconduct and recommending and monitoring appropriate corrective action.

	Policy No.: 108	
	Created: 1/2000	Reviewed: 8/2019

- Maintaining confidentiality of items discussed during the meetings.

Members of this Committee include the CCO or designee, President of Envision Physician Services or designee, and at least one Vice President or Manager from each of the following departments: Legal, Finance, Revenue Cycle Management, IT, HR and Operations.

The CCO or designee is responsible for developing meeting agendas and distributing pertinent review information to members. Meetings will be held, at a minimum, quarterly.

Reporting Relationships

The CCO or designee works closely with the department heads to ensure an understanding of overall Envision Physician Services initiatives and establishment of quality monitoring initiatives that address any specific areas. Additionally, the CCO or designee works closely with department heads to review results of audits and direct revision/updates in departmental processes based on quality reviews. The results of quality monitoring initiatives, quarterly audits and any compliance issue raised by colleagues or contractors through voluntary reporting mechanisms are submitted on a quarterly basis to the Compliance & Integrity Committee for review and input on further educational efforts, policy changes or other corrective action measures which are needed to assure compliance. Recommendations resulting from the Envision Physician Services Compliance & Integrity Committee are reported to the Envision Healthcare Executive Compliance Committee and the Compliance & Quality Committee of the Board.

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.