
	Policy No.: 114	Signature: 	
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## **FOCUSED ARRANGEMENTS REVIEW AND APPROVAL PROCESS**

### **SCOPE:**

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

### **PURPOSE:**

The purpose of this policy is to outline a written review and approval process for all Focused Arrangements, to ensure that all new and existing or renewed Focus Arrangements do not violate the Anti-Kickback Statute.

### **POLICY:**

A legal review of all Focused Arrangements by counsel with expertise in the Anti-Kickback Statute will occur for all new, existing and renewing Focused Arrangements to ensure their compliance with the Anti-Kickback Statute.

### **PROCEDURE:**

#### *Legal Review*

Any new, existing or renewing Focused Arrangement will be sent to legal counsel for review. The legal review will take place before any further action is taken on the new, existing or renewed Focused Arrangement. No Focused Arrangement shall be instituted until the final legal review has been performed and written approval is provided. The review will include identification of the business need or rationale for all Focused Arrangements. The review will ensure that each existing, new or renewal Focused Arrangement does not violate Anti-Kickback Statute or the regulations, directives, and guidance related to this statute. A process will be in place to determine and document the fair market value of the remuneration specified in the Focused Arrangement (if applicable). All Focused Arrangements will be tracked in the centralized Focused Arrangements tracking system to include any modifications or updates to the Focused Arrangements.

### **POLICY REVIEW**

The Ethics & Compliance Department will review and update this Policy and all HIPAA policies when necessary in the normal course of its review of the Corporate Ethics & Compliance Program.