

	Ethics & Compliance Department	
	Policy No.: 10	Created: 07/2015
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RESPONDING TO GOVERNMENT INVESTIGATIONS

SCOPE

Applies to all Envision clinicians and teammates. 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 Responding to Government Investigations policy to provide guidance for responding appropriately to requests or inquiries from government agencies.

POLICY

It is the Company’s policy to cooperate fully with reasonable requests from any government agency concerning the Company's operations. The fact that a law enforcement agent requests information from the Company or its clinicians or teammates does not mean there has been a violation of the law. The Company has legal obligations to comply with Medicare and Medicaid rules and regulations as a result of its billing entities and contracts with hospitals. Certain governmental entities have the right to request information about the services the company provides. Clinicians and teammates of the Company may receive requests for information. It is Company policy that clinicians and teammates notify the Compliance Department and/or Legal Department before responding to any requests which are outside the ordinary scope of routine reports regularly made to government authorities.

CLINICIAN AND TEAMMATE RIGHTS IN RESPONDING TO GOVERNMENT INQUIRIES OR REQUESTS

- The right to consult with legal counsel during a government investigation or inquiry.
- The right to decide whether he/she wishes to speak to, or not to speak to, a government investigator.
- The right to ask for time to consult with a Company representative or to review Company information.

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- If he/she decides to be interviewed, the right to ask the investigator to schedule the interview at a convenient time and place and to have an attorney present at the interview.

A CLINICIAN’S OR TEAMMATE’S OBLIGATION IN RESPONDING TO GOVERNMENT INQUIRIES OR REQUESTS

- Never destroy Company documents in anticipation of a request.
- Never alter Company documents, records, or patient medical records.
- Never lie or make misleading statements to government investigators.
- Never pressure anyone to hide information from, or provide false information to, government investigators.

REQUESTS FOR INFORMATION CAN COME FROM

- United States Department of Health and Human Services (“HHS”);
- HHS Office of Inspector General;
- Department of Justice, Attorneys General Offices or the United States Attorneys’ Offices;
- Carriers or fiscal intermediaries acting on behalf of HHS or lower state Medicaid programs;
- State or Local Prosecutor’s Offices;
- State Departments of Public Welfare or Medical Assistance;
- State Boards of Medicine, Nursing, and other licensing bodies;
- Office of Civil Rights; and/or
- Federal Bureau of Investigations, Internal Revenue Service, and other federal or state investigative agencies.

REQUESTS COULD BE IN ANY OF THESE FORMS

- A contract review letter;
- A civil investigative demand;
- An audit letter requesting access to, or copies of, files and other records;
- A pre-payment or post-payment review letter;
- A subpoena from either a state or federal grand jury;
- A subpoena from either a state or federal agency or from a law enforcement agency;
- A request for an interview; and/or
- A search warrant.

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PROCEDURE

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- Always make sure to ask the interviewer’s name and proof of his or her identity.
- Request a description of the information sought and the reason the agency believes you have this information.
- Remember your rights.
- Notify the Compliance Department and/or the Legal Department.

Immediately report any and all contact with government agencies regarding inquiries into the Company’s operations to the Compliance Department and/or the Legal Department. A copy of any letter, subpoena, correspondence, audit request, or other document received from a government agent must be forwarded to the Compliance Department and/or the Legal Department within 24 hours of receipt. This includes any inquiries or requests outside the ordinary scope of routine reports that are regularly made to government authorities.

Understand your rights and obligations as previously outlined. Note that government agents are permitted to record conversations without a teammate’s knowledge or consent, and they do not need a court order to do so.

SUBPOENAS

All subpoenas directed to the Company must be formally served by proper service of process through the Company’s designated registered agent. Clinicians and teammates are not authorized to accept service of subpoenas on behalf of the Company. Any requests to accept service of any process or subpoena should be refused and directed to the Company’s registered agent for service of process.

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.