

	Ethics & Compliance Department	
	Policy No.: 12	Created: 07/2015
		Reviewed: 06/2025
		Revised: 10/2021

MONITORING AND AUDITING

SCOPE:

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

PURPOSE:

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Monitoring and Auditing policy to outline the monitoring and auditing procedures to be followed by the Company’s Ethics & Compliance Department.

POLICY AND PROCEDURE:

I. Coding and Billing Monitoring and Auditing

Monitoring and auditing enable the Ethics & Compliance Department to monitor the effectiveness of the Company’s coding and billing efforts and target additional training efforts.

- The Ethics & Compliance Department directs coding and billing reviews of government payor claims conducted by outside third-party consultants.
- Medical records of government beneficiary payors are randomly selected for a retrospective review on a routine basis (*See the statistical sampling method in Attachment A*). A prospective review may be conducted, where necessary, as determined by the Ethics & Compliance Department.
- Independent auditors review the sample according to current CMS coding documentation guidelines, CPT, and the current ICD coding book.
- Independent auditors review the sample and provide the Ethics & Compliance Department with the report of findings and compliance exceptions, if any.

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- The Ethics & Compliance Department reviews the findings, works with the auditor and coding team to resolve any disputes, and provides reports to the Company’s Compliance Committees.
- Corrective action shall be initiated for material exceptions greater than 5%.
- The Ethics & Compliance Department verifies the implementation of corrective action processes.
- After a reasonable amount of time, the Ethics & Compliance Department will validate the effectiveness of such corrective action.

Audit Frequency

The Ethics & Compliance Department will outline a proposed audit schedule, annually, for review by the Executive Compliance Committee. Historical audit results, volume of claims billed, and items identified through the Ethics & Compliance Department’s annual risk assessment as outlined in the Risk Assessment Policy will be considered when preparing the annual audit schedule for review and approval. The audit schedule may be modified, if appropriate, in response to review findings.

Ad Hoc Review

In response to any identified risk areas, the Ethics & Compliance Department will conduct ad hoc reviews, when appropriate. The size and scope of the review will be based on the nature of the identified risk area. Upon identification of the risk area, the review will be conducted within a reasonable time frame. Findings will be reviewed by the Ethics & Compliance Department and relevant stakeholders for all material exceptions. Implementation of corrective action will be reviewed and verified.

II. Facility Contracts Monitoring and Auditing

The Ethics & Compliance Department will conduct Facility Contracts reviews which will focus on the Facility Contracts review and approval process to ensure Facility Contracts are entered into the Facility Contracts Tracking System (“Onit”), and do not violate the Anti-Kickback Statute.

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The Ethics & Compliance Department will report the findings to the Company's Compliance Committees.

Corrective action shall be initiated and verified, as applicable.

Audit Frequency

The Ethics & Compliance Department will review the facility contracts review and approval process, annually, and outline a proposed audit schedule for review by the Executive Compliance Committee. The schedule may be modified, if appropriate, in response to review findings.

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.