 Envision PHYSICIAN SERVICES	Policy No.: 114	
	Created: 5/2018	Reviewed: 9/2020	

FOCUS ARRANGEMENTS REVIEW AND APPROVAL PROCESS
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 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 Focus 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 Focus Arrangements by counsel with expertise in the Anti-Kickback Statute will occur for all new, existing and renewing Focus Arrangements to ensure their compliance with the Anti-Kickback Statue.

PROCEDURES:

Legal Review

Any new, existing or renewing Focus 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 Focus Arrangement. No Focus 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 Focus Arrangements. The review will also ensure that each existing, new or renewal Focus Arrangement do 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 Focus Arrangement (if applicable). All Focus Arrangements will be tracked in the centralized Focus Arrangements tracking system to include any modifications or updates to the Focus Arrangements.

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.