	Policy No.: 116		
	Created: 10/2019	Reviewed: 9/2020	Revised:

MANAGEMENT CERTIFICATIONS

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 full-time employees, independent contractors, clinicians, officers and directors.


PURPOSE:

The purpose of this policy is to outline Envision Physician Services’ (the “Company”) obligations and process for obtaining management certifications from certifying employees per the requirements of the Corporate Integrity Agreement (the “CIA”).

POLICY:

Per the requirements of the CIA, certain Envision employees – “Certifying Employees” – are expected to monitor and oversee activities within their areas of authority and shall annually certify that the applicable Company department is in compliance with applicable Federal health care program requirements and with the obligations of this CIA. These Certifying Employees shall include, at a minimum, all members of senior management and the leaders of all groups, business units or departments with operations that relate to the Federal health care programs (e.g., (i) Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Accounting Officer and Chief Strategy Officer for Envision Healthcare Corporation; (ii) President, Executive Vice Presidents, Senior Vice Presidents, Regional Medical Directors, and Site Medical Directors for the Company’s Emergency Medicine, Hospitalist, and Critical Care Service Lines). For each Reporting Period, each Certifying Employee shall sign a certification that states:

“I have been trained on and understand the compliance requirements and responsibilities as they relate to [insert name of department], an area under my supervision. My job responsibilities include ensuring compliance with regard to the [insert name of department] with all applicable Federal health care program requirements, obligations of the Corporate Integrity Agreement, and Envision policies, and I have taken steps to promote such compliance. To the best of my knowledge, the [insert name of department] of Envision is in compliance with all applicable Federal health care program requirements and the obligations of the Corporate Integrity Agreement. I understand that this certification is being provided to and relied upon by the United States.”

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If any Certifying Employee is unable to provide such a certification, the Certifying Employee shall provide a written explanation of the reasons why he or she is unable to provide the certification outlined above.

PROCEDURE:

On an annual basis, the Ethics & Compliance Department will work with the Human Resources Department to identify all colleagues who meet the definition of a Certifying Employee as outlined in the CIA. Certifying Employees will be identified based on the job title assigned to the colleague at the time the certifications are being made.

Once the Certifying Employees have been identified, the Ethics & Compliance Department will distribute the certifications for execution. Completion of the certifications will be tracked by the Ethics & Compliance Department which will ensure all certifications are executed and received prior to the end of the Reporting Period.

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.