	<b>Ethics &amp; Compliance Department</b>		
	<b>Policy No.: 1</b>	<b>Created:</b>	09/2019
		<b>Reviewed:</b>	05/2023
		<b>Revised:</b>	

## **COMPLIANCE & INTEGRITY COMMITTEE**

### **SCOPE:**

Applies to all AMSURG Corp. and its subsidiary or joint venture entities, including affiliated ambulatory surgery center teammates. For purposes of this policy, all references to “teammate” or “teammates” include temporary, part-time and covered persons, full-time employees, independent contractors, clinicians, officers and directors.

### **PURPOSE:**


Although it is the responsibility of all teammates and subsidiaries and affiliates within the Envision Healthcare (“Envision” or “the Company”) network to comply with the Company’s Ethics & Compliance Program, AMSURG has adopted this Compliance & Integrity Committee policy in order to establish a committee of executive management personnel to have primary responsibility of the Ethics & Compliance Program. Day-to-day administrative responsibilities are assigned to the Company’s Chief Compliance Officer (“CCO”).

### **POLICY:**

#### ***Responsibilities of the Compliance & Integrity Committee***

The Committee’s responsibilities will include:

- Confirming the proper evaluation and response to ethical and regulatory issues and concerns.
- Recommending and monitoring educational and teaching activities in order that standards and procedures reduce improper conduct.
- Reviewing the quarterly coding audits which are conducted by an outside consulting firm to confirm they are performed according to the compliance Monitoring and Auditing policy and that all auditing issues are properly addressed.
- Reviewing and revising compliance policies to confirm the standards are consistent with regulatory requirements.
- Assessing results of external reviews to determine whether any overpayments identified are accurate and initiate the Company’s appeal rights related to any such overpayments for which the Company disagrees.
- Analyzing reports of misconduct and recommending and monitoring appropriate corrective action.
- Maintaining confidentiality of items discussed during the meetings.

	<b>Ethics &amp; Compliance Department</b>		
	<b>Policy No.: 1</b>	<b>Created:</b>	09/2019
		<b>Reviewed:</b>	05/2023
		<b>Revised:</b>	

Members of this Committee include the CCO or designee, President of AMSURG, and at least one Vice President or Manager from each of the following departments: Legal, Finance, Revenue Cycle Management, People & Culture, and Operations.

The CCO or designee is responsible for developing meeting agendas and distributing pertinent review information to members. Meetings will be held, at a minimum, quarterly.

***Reporting Relationships***

The CCO or designee works closely with the department heads to ensure an understanding of overall AMSURG initiatives and establishment of quality monitoring initiatives that address any specific areas. Additionally, the CCO or designee works closely with department heads to review results of audits and direct revision/updates in departmental processes based on quality reviews. The results of quality monitoring initiatives, quarterly audits and any compliance issue raised by teammates through voluntary reporting mechanisms are submitted on a quarterly basis to the Compliance & Integrity Committee for review and input on further educational efforts, policy changes or other corrective action measures which are needed to assure compliance. Recommendations resulting from the AMSURG Compliance & Integrity Committee are reported to the Envision Healthcare Compliance Committee and the Envision Healthcare Board of Directors.

**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.