	Ethics & Compliance Department	
	Policy No.: 7	Created: 08/2022
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	Revised:	

PARTNER SELECTION

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:

Envision Healthcare and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Partner Selection policy to establish a protocol for identifying and documenting the business rationale, the selection process, and the selection criteria for physician partners at ambulatory surgery centers in which AMSURG has a controlling interest or otherwise manages (“ASCs”).

POLICY:


AMSURG selects physician partners who are seeking to invest in an ASC as an extension of their physician offices, based on clinical excellence and commitment to patient service.

AMSURG is committed to ensuring that its relationships with physicians are compliant with applicable laws, including but not limited to the Anti-Kickback Statute. AMSURG does not offer, pay, provide, or accept any remuneration, including any payment of any type, or any investment opportunity, in exchange for referrals of patients.

Physician partners are never limited in where they can refer their patients, including referring patients to a competitor facility. Physician partners are not expected to refer patients to an ambulatory surgery center in which AMSURG has a controlling interest or otherwise manages as part of their duties as partners. *See* AMSURG Anti-Kickback Statute policy.

PROCEDURE:

The Operator with primary responsibility for the ASC (the “Operations Lead”) evaluates potential physician partners based on appropriate partner selection criteria, as outlined in this Procedure. The Operations Lead shall document such evaluation and final decision.


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1. The business purpose of a physician joint venture is to have a partner with a commitment to high- quality, high-value surgical services and have the capability to contribute to the operations of the ASC. In each community in which an ASC operates, AMSURG operations is responsible for developing relationships with physicians who could advance these business purposes.
2. The Operations Lead may choose to initiate the partner selection evaluation process:
 - a. When the Operations Lead learns that a physician is interested in becoming a partner at an ASC or expanding his or her existing relationship with an ASC, or
 - b. When the Operations Lead identifies a need to partner with a physician in the community on a de novo ASC or to ensure the continued successful operation of an existing ASC, including by expanding an existing relationship with a physician partner.

3. **PARTNER SELECTION CRITERIA:**

The Operations Lead evaluates a physician partner based on the partner selection criteria:

- a. **NEW PARTNER SELECTION CRITERIA:** AMSURG’s Operations division evaluates a potential physician partner that does not have an existing relationship with an ASC based on the below new partner selection criteria:
 - i. Ability to become credentialed at the ASC if not already and satisfy basic criteria for practice, including not being excluded from federal healthcare programs and being licensed in good standing with state authorities
 - ii. Experience performing the procedures that would be performed at the ASC and clinical training/background
 - iii. Willingness to adhere to ASC Policies, Envision Healthcare’s Code of Business Conduct, and corporate compliance policies, as applicable
 - iv. Willingness to adhere to all applicable state and federal laws and regulations
 - v. History of engagement and commitment to patient care/center excellence and reputation in the community


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- vi. Ability to and interest in performing partner duties, including attending and meaningfully contributing to partnership meetings, helping to improve clinical outcomes, improving market presence and profile, and helping create more engaged teams at the ASC
- vii. Availability to devote adequate time to partner duties, notwithstanding time constraints and burdens of other obligations and competing commitment

b. **EXISTING PARTNER CRITERIA:** AMSURG’s Operations division evaluates a physician partner that already has an existing relationship with at least one ASC (“existing ASC investment entity”) based on the established partner selection criteria:

- i. Demonstrated compliance with basic criteria for practice
- ii. Appropriate clinical training and background and experience performing the procedures that are performed at the existing ASC or would be performed at another ASC
- iii. Demonstrated adherence to ASC Policies, Envision Healthcare’s Code of Business Conduct, and corporate compliance policies, as applicable
- iv. Demonstrated adherence to all applicable state and federal laws and regulations
- v. History of engagement and commitment to patient care/center excellence, particularly at the existing ASC investment entity, and reputation in the community
- vi. Demonstrated success in performing partner duties, including attending and meaningfully contributing to partnership meetings, helping to improve clinical outcomes, improving market presence and profile, and helping create more engaged teams at the ASC
- vii. Demonstrated success in devoting adequate time to partner duties

4. Operations Lead, together with the Operations Vice President with responsibility over the ASC documents the evaluation of the appropriate partner selection criteria by completing the applicable New Partner Selection Assessment form which addresses the physician’s qualifications under each partner selection criterion.

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See:

- a. Attachment A-1, ASC New Partner Selection Assessment, and
 - b. Attachment A-2, ASC Existing Partner Assessment.
5. The Legal and Ethics & Compliance Departments review each evaluation. If an evaluation is complete and adequate, the Ethics & Compliance Department notifies the Operations Lead and the Operations Vice President with responsibility over the ASC in writing that the potential partner can receive a partnership offer.

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.

ATTACHMENT A-1
ASC New Partner Selection Assessment

Operator: _____

Date: _____

Center Name: _____

Center Number: _____

Prospective Physician Partner: _____

1. Does the physician satisfy basic criteria for practice, including:
 - Is credentialed at the ASC (or can become credentialed)
 - Is not excluded from federal healthcare programs
 - Is licensed in good standing with state regulatory authorities

2. In a brief narrative response, please describe the physician's experience performing the procedures that would be performed at the ASC and his or her clinical training/background:

3. Is the physician willing to adhere to:
 - Envision Healthcare's Code of Business Conduct and Corporate Compliance Policies (as applicable)
 - All applicable state and federal laws and regulations

4. In a brief narrative response, please describe the physician's history of engagement and commitment to patient care/center excellence and reputation in the community:

5. In a brief narrative response, please describe the physician's ability to and interest in performing partner duties, including attending and meaningfully contributing to partnership meetings, helping to improve clinical outcomes, improving market presence and profile, and helping create more engaged teams at the ASC:

6. Does the physician have availability to devote adequate time to partner duties, notwithstanding time constraints and burdens of other obligations and competing commitment?
 - Yes No

ATTACHMENT A-2
ASC Existing Partner Selection Assessment

Operator: _____

Date: _____

Center Name: _____

Center Number: _____

Existing Physician Partner: _____

1. Has the physician satisfied (and can continue to satisfy) basic criteria for practice, including:
 - Is credentialed at the ASC
 - Is not excluded from federal healthcare programs
 - Is licensed in good standing with state regulatory authorities

2. In a brief narrative response, please describe the physician's experience performing the procedures that are performed at the existing ASC investment entity , and his or her clinical training/background:

3. Has the physician consistently demonstrated adherence to:
 - Envision Healthcare's Code of Business Conduct and Corporate Compliance Policies (as applicable)
 - All applicable state and federal laws and regulations

4. In a brief narrative response, please describe the physician's history of engagement and commitment to patient care/center excellence, particularly at the existing ASC investment entity, and reputation in the community:

5. In a brief narrative response, please describe the physician's demonstrated success in performing partner duties, including attending and meaningfully contributing to partnership meetings, helping to improve clinical outcomes, improving market presence and profile, and helping create more engaged teams at the ASC:

6. Has the physician successfully devoted adequate time to partner duties, and do you expect the physician to continue to be able to devote adequate time to partner duties?
 - Yes No