

	Policy No.: 5	Signature: 	
	Created: 7/2012	Reviewed: 5/2018	Revised: 7/2015

## **EXCLUDED OR DEBARRED PERSONS OR ENTITIES POLICY**

### **SCOPE:**

All Envision Healthcare 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:**

Envision Healthcare and its subsidiaries (the” Company”) has adopted this Excluded or Debarred Persons or Entities Policy in order to ensure compliance with all applicable federal or state laws and regulations related to the employment of individuals or entities who are ineligible to participate in any federal or state healthcare reimbursement program including, but not limited to, Medicare and Medicaid.

### **POLICY AND PROCEDURE:**

#### **I. INTRODUCTION**

The Company is committed to hire and retain all colleagues who will meet the Company’s high ethical standards for employment. The Company has an affirmative duty to avoid hiring or retaining colleagues who have engaged in unlawful conduct including fraud or financial irregularities or other conduct which may harm other colleagues, patients, or the general public.

The Company will not knowingly employ any individual or entity that is listed by a federal agency as excluded, debarred, or otherwise ineligible for federal programs. The Company shall not allow any person convicted in any local, state or federal court of any felony to hold the position of officer or director of the Company, or any subsidiaries.

#### **II. SCREENING**

Prior to hiring any new colleague, or contracting with entities, the Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE) and GSA (General Services Administration) System for Award Management (SAM) are reviewed to ensure none are excluded from participating in federal programs. For new colleagues, the OIG and GSA exclusion checks are conducted by Human Resources or it’s designee as part of the new hire and /or credentialing process. For new contractors, the exclusion checks shall be conducted by a designee as part of the initial due diligence process.

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After the initial screening checks are conducted, the Compliance Department, or its designee, conducts monthly checks of the OIG and GSA exclusion lists to ensure no colleagues and/or contractors are listed as excluded or debarred. Monthly screenings of State exclusions databases are also conducted for all states in which the Company or its subsidiaries conduct business and data is available. Colleagues identified as having failed to properly screen persons or entities in accordance with the Company Policy will be subject to discipline up to and including termination.

### **III. DOCUMENTATION OF COMPLETED SCREENINGS**

The Compliance Department designee will maintain confirmation that the screenings have been completed. As requested, or contractually required, the Compliance Officer or designee will provide attestations that the monthly screenings have occurred and will acknowledge on the attestations the results of the screenings.

### **POLICY REVIEW**

The Ethics & Compliance Department will review and update this Policy in the normal course of its review of the Corporate Ethics & Compliance Program.