



Policy No.: 108

Created: 6/2015

Reviewed: 6/2019

Revised: 7/2019

COMPLIANCE & INTEGRITY COMMITTEE POLICY

ETHICS & COMPLIANCE DEPARTMENT

SCOPE:

Applies to all members of the Evolution Health Compliance & Integrity Committee. 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:

Evolution Health (the “Company”) 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 Evolution Health’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.



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Members of this Committee include the Chief Compliance Officer or designee, President of Evolution Health, and at least one Vice President or Manager from each of the following departments: Legal, Finance, Revenue Cycle Management, HR and Operations.

The Chief Compliance Officer 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 Chief Compliance Officer or designee works closely with the department heads to ensure an understanding of overall Evolution Health 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 colleagues or contractors 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 Evolution Health 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 and all HIPAA policies when necessary in the normal course of its review of the Ethics & Compliance Program.