

	Ethics & Compliance Department		
	Policy No.: 303	Created:	01/2000
		Reviewed:	06/2026
		Revised:	07/2023

PROFESSIONAL COURTESIES AND PATIENT DISCOUNTS

SCOPE

Applies to all Envision clinicians and teammates associated with the billing and coding process in any way, including all internal and external billing companies utilized by Envision. For purposes of this policy, all references to “clinician” or “teammate” include temporary, part-time and full-time employees, independent contractors, officers and directors.

PURPOSE

Envision Healthcare Operating, Inc. and its subsidiaries and affiliates (“Envision” or the “Company”) has adopted this Professional Courtesies and Patient Discounts Policy to establish the policy against waiving or reducing a patient’s obligation to pay an amount owed to the Company for the provision of medical services, including co-insurance or deductible amounts, except in the specific and limited circumstances set forth below.

POLICY

Company’s clinicians and teammates and internal/external billing entities shall not waive or reduce a patient’s obligation to pay amounts owed for the provision of medical services, except as described in this policy. This policy applies to all patients, regardless of type of medical coverage.

PROCEDURE

The amount a patient is obligated to pay, including co-pays, deductibles and any other remaining amounts owed (the “Patient’s Responsibility”) shall only be waived or reduced under certain limited circumstances described below.

- A. **A Patient’s Responsibility may be waived or reduced when a patient is unable to pay for the services provided or has been established to be indigent by the applicable facility’s indigency or charity care policies.** A request to waive or reduce a Patient’s Responsibility due to financial need must be referred to and reviewed by the

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Company's Revenue Cycle Management ("RCM") Patient Financial Services team for evaluation in accordance with RCM's policies.

- B. **A Patient's Responsibility may be waived or reduced when there is a service gap.**
RCM's Patient Financial Services team will refer any request to waive or reduce a Patient's Responsibility due to service gaps to the Company's applicable service line leader for review. If the service line leader approves the waiver or reduction, he or she will forward the request to the Ethics & Compliance Department to review and evaluate the request.
- C. **A Patient's Responsibility may be waived or reduced when the cost of billing and collecting the Patient's Responsibility would exceed, or be disproportionate to, the amount to be collected.**
- D. **A Patient's Responsibility may be waived or reduced when the waiver is made after reasonable efforts have failed to collect the Patient's Responsibility directly from the patient, referred to as bad debt write-offs.** Waivers under this paragraph must follow the Company's standard RCM collection policies.
- E. **A Patient's Responsibility may be waived or reduced when the Company has made an error in billing.**
- F. **A Patient's Responsibility may be waived or reduced in accordance with any self-pay and early pay discount policies, established by RCM's Patient Financial Services team.**

"No charges" or discounts applied, pursuant to paragraphs A-C above, must be applied equally to all payors for the patient's claim.

A Patient's Responsibility will not be waived or discounted under any circumstance not explicitly stated above.

Waivers or discounts must never be offered as an inducement to attract, retain, or influence patients, referral sources, or volumes of business.

Implementation must comply with applicable federal and state laws, including state-specific charity care and patient financial assistance requirements.

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Waivers or reduction of a Patient’s Responsibility that do not strictly comply with the above policy standards are strictly prohibited by this policy.

Questions related to the waiver or reduction of any portion of a Patient’s Responsibility should be directed to the Ethics & Compliance Department.

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.