Offshore operations
You may not engage in offshore operations for Medicare business without the express written consent of an authorized Encompass Health representative in advance of the use of such offshore operations. These activities, if involving the receipt, processing, transferring, handling, storing or access of PHI, must be reported to CMS.

Downstream Entity oversight
If your organization chooses to subcontract with other individuals/parties to provide healthcare services or certain administrative services on your behalf, you are responsible for ensuring these Downstream Entities abide by all laws and regulations that also apply to you as a First-Tier Entity. You must conduct appropriate oversight of your Downstream Entities to ensure compliance with applicable laws and regulations including routine monitoring and auditing to identify compliance risks. You must also develop and implement procedures to promptly respond to suspected and identified issues. You should track and document these efforts, including any actions taken to resolve identified issues.

Our purpose
We believe integrated care delivery across the healthcare continuum is critical to achieving the best outcomes for patients. We exist to provide a better way to care that elevates expectations and outcomes.

Our values
SET THE STANDARD  We are committed to going above and beyond, never settling for anything less than excellence. We pride ourselves on being industry leaders and challenge ourselves to continuously improve.

LEAD WITH EMPATHY  We start with empathy, taking the time to understand the physical, mental and emotional needs of each other and those we support. We listen, make deep connections and engage on a personal level to better serve those we support.

DO WHAT’S RIGHT  We do the right thing the right way, no matter how difficult, even when no one is looking. We’re not afraid to have hard conversations. If we make a mistake, we acknowledge it, proactively find a resolution and make it right going forward.

FOCUS ON THE POSITIVE  We have a positive spirit and find the light even in the most difficult situations. We bring our whole self to work. We celebrate successes and inspire others to create meaningful impact.

STRONGER TOGETHER  We believe our individual strengths make us stronger together. We take accountability for our actions, connect across teams and lean in to get it done – at all levels of the Company.

Resources
Ethics & compliance department
205.970.5900

HIPAA privacy office
205.969.6882

Compliance Hotline
888.800.2577

Vendor compliance website
www.encompasshealth.com/vendorcompliance

Supply chain operations
800.765.4772
Ethics and compliance program

Do what’s right
Encompass Health is committed to conducting business in compliance with all applicable federal, state and local laws and regulations, and to acting at all times in conformance with the highest standards of business conduct. We have created this compliance guidance for vendors to help us accomplish these objectives by establishing a general framework for acting with honesty, openness, and integrity in accordance with a shared set of principles. For more detailed guidance, visit encompasshealth.com/vendorcompliance.

Ethics & compliance department
Questions or concerns relating to suspected compliance violations should be brought to the attention of Encompass Health’s Ethics & Compliance Department by phone at 205.970.5900 or by email at compliance@encompasshealth.com. Reports made directly to the Encompass Health’s Ethics & Compliance Department are confidential, and anyone who, in good faith, reports known or suspected incidents of noncompliance will not be subject to retaliation. All credible reports of noncompliance will be investigated.

Compliance hotline
You may also report suspected compliance violations anonymously, confidentially and without fear of retaliation via the toll-free Encompass Health Compliance Hotline at 888.800.2577 or online at www.encompasshealth.ethicspoint.com. The Encompass Health Compliance Hotline operates 24 hours a day, seven days a week. The Compliance Hotline has access to interpreters of numerous foreign languages as well.

Encompass Health will not retaliate against anyone who, in good faith, reports a compliance or financial integrity concern. We require all First-Tier and Downstream Entities to adopt a comparable non-retaliation policy for reports about potential noncompliance it receives directly.

Compliance guidance for vendors
The information provided in the Compliance Guidance for Vendors, the “Guide”, applies to all vendors that provide administrative or healthcare services on behalf of Encompass Health (First-Tier Entities), as well as any individuals or entities with whom Encompass Health’s First-Tier Entities have contracted (Downstream Entities) to provide administrative or healthcare services to or on behalf of Encompass Health and our patients.

We ask that you familiarize yourself, your employees and your applicable Downstream Entities with the guide and follow it in your work with Encompass Health. No single document can address every issue that may arise in the course of business; therefore, should you have questions or need additional information, you should consult one of the resources provided in this pamphlet.

Compliance with laws
You are expected to know and follow the laws and regulations that apply to your organization. Encompass Health expects all vendors to promptly investigate any reports of suspected violations of applicable laws and regulations, and to take appropriate action against employees and Downstream Entities who have been found to have violated such laws or regulations.

Gifts and business courtesies
Encompass Health discourages you and your employees from providing gifts, meals, entertainment or other business courtesies to our employees or patients in order to avoid actual or perceived impropriety, conflicts of interest, or the perception that the quality of care furnished is dependent on the offering of gifts or other gratuities.

Visitation and marketing activities
Vendor representatives are required to schedule appointments and must register prior to visiting Encompass Health. Vendors should not disrupt workflow, and should not distribute advertisements or information on your products or services unless such items are approved by Encompass Health prior to distribution. Generally, only materials that educate patients concerning their health will be permitted.

Conflicts of interest
Conflicts of interest between vendors and Encompass Health employees, or the appearance thereof, should be avoided. Your organization is responsible for implementing processes and procedures to review and disclose potential conflicts of interest. When an actual conflict of interest arises, that conflict must be disclosed to Encompass Health’s Ethics & Compliance Department for further review.

Excluded providers
Medicare payment may not be made for items or services furnished or prescribed by an excluded provider or entity. You are expected to review the DHHS OIG List of Excluded Individuals and Entities (LEIE list), the GSA Excluded Parties Lists System (EPLS), and applicable state exclusion lists prior to the hiring or contracting of any new employee (including temporary employees and volunteers), subcontractors or vendors, and monthly thereafter, to ensure that none of these persons or entities are excluded or become excluded from participation in federal programs. Proof of verification should be maintained for 10 years in accordance with CMS records retention requirements.

Compliance training
Vendors are encouraged to provide their employees with general compliance and fraud, waste and abuse training at hire and at least annually. The training content should be tailored to the organization's operations, resources and compliance risks.