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I. SCOPE:

This policy applies to all officers of Tenet Healthcare Corporation and its wholly-owned subsidiaries and affiliates (“Tenet”) and all Tenet employees with the title of Vice President and above whether they work in the Headquarters office, Regional, Market or other office (“Tenet Corporate Management”).

II. PURPOSE:


The purpose of this policy is to promote Tenet’s adherence to compliance and quality standards and to ensure compliance with the [Corporate Integrity Agreement](#) (CIA) dated September 27, 2006 between Tenet Healthcare Corporation and the Office of Inspector General of the Department of Health and Human Services.

III. POLICY:

Tenet seeks to assure compliance with the [CIA](#) by establishing clinical quality measures and compliance programs to evaluate Tenet Corporate Management. These tools shall be distributed to Tenet Corporate Management and the Senior Vice President of Human Resources and the Chief Compliance Officer shall evaluate compliance against these measures.

IV. PROCEDURE:

- A. Each year, the Senior Vice President of Human Resources and the Chief Compliance Officer shall establish clinical quality measures and compliance program effectiveness measures by which Tenet Corporate Management will be evaluated. The standards to be utilized shall be distributed to Tenet Corporate Management. These measures may include items such as performance on the Balanced Scorecard, performance in implementing and maintaining adherence to the [CIA](#) or other measures.
- B. The Senior Vice President of Human Resources and the Chief Compliance Officer shall review each Tenet hospital’s performance under the clinical quality program effectiveness measures and the compliance program effectiveness measures for the preceding year.
- C. The results of the clinical quality program effectiveness measures and the compliance program effectiveness measures shall be incorporated into the performance review for each member of Tenet Corporate Management, and as such, the base compensation to be paid each member of Tenet Corporate

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Management in the upcoming year shall be linked to performance on the clinical and compliance measures.

D. In addition, Tenet Corporate Management’s incentive compensation shall be linked to the compliance and quality measures. See the HR-516 Management Quality, Compliance and Ethics Committee Compensation Modifier policy for further guidance.

E. Relation to Other Policies

1. The compensation adjustments addressed in this policy are independent of any other corrective, remedial, or disciplinary action, which may be taken in response to a quality, compliance or ethics issue. Such other actions are governed by Tenet’s policies and procedures and may include any other personnel action including termination of employment.
2. This policy is not intended to alter the discretionary nature of any compensation or incentive award.

F. Enforcement

All employees whose responsibilities are affected by this policy are expected to be familiar with the basic procedures and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate disciplinary action pursuant to all applicable policies and procedures, up to and including termination. In addition, failure to adhere to the terms and conditions of this policy will be referred to the Quality, Compliance and Ethics Committee of the Tenet Board of Directors. Such disciplinary action may also include modification of compensation, including any merit or discretionary compensation awards.

V. REFERENCES:

- [Corporate Integrity Agreement Between The Office Of Inspector General Of The Department of Health and Human Services And Tenet Healthcare Corporation, signed September 27, 2006](#)
- HR-516 Management Quality, Compliance and Ethics Committee Compensation Modifier