	Human Resource Policy Employment & Hiring Practices	No. HR.EHP.02¹
	Title: IMMIGRATION LAW COMPLIANCE	Page: 1 of 3
		Effective Date: 09-27-11
		Retires Policy Dated: 04-01-10
		Previous Versions Dated: 01-01-09; 04-01-03;² 08-01-00; 01-01-93;

I. SCOPE:

This policy applies to (1) Tenet Healthcare Corporation and its wholly-owned subsidiaries and affiliates (each, an “Affiliate”); (2) any other entity or organization in which Tenet Healthcare Corporation or an Affiliate owns a direct or indirect equity interest greater than 50%; and (3) any hospital or healthcare facility in which Tenet Healthcare Corporation or an Affiliate either manages or controls the day-to-day operations of the facility (each, a “Tenet Facility”) (collectively, “Tenet”).

II. PURPOSE:

The purpose of this policy is to provide supervisors with appropriate guidelines regarding the verification of employment eligibility of all job applicants.

III. POLICY:

Tenet is committed to employing only United States citizens and aliens authorized to work in the United States and does not unlawfully discriminate on the basis of citizenship or national origin.


In compliance with the Immigration Reform and Control Act of 1986, each new employee, as a condition of employment, must complete the Employment Eligibility form I-9 and present documentation establishing identity and employment eligibility. Former employees who are rehired must also complete the form if they have not completed an I-9 with Tenet within the past three (3) years, or if their previous I-9 is no longer retained or their previous work authorization is no longer valid.

New employees must provide acceptable employment authorization and identification documents. Tenet applies this policy in accordance with the current documents identified as being accepted by the Department of Homeland Security. All verification documents must be originals unless otherwise noted. Acceptable documents include one from List A or one from List B and one from List C. The employee chooses which document or documents he or she wishes to present. To avoid any misunderstanding, tell employees to, "Present a document from List A or one each from Lists B and C."

Employees with questions or who seek more information on immigration law issues are encouraged to contact the Human Resources Department. Employees may raise questions or complaints about immigration law compliance without fear of reprisal.

¹Prior to June 3, 2013, the policy number was HR-103.

²The policy published 04-01-10 listed an incorrect previous version date of 04-01-93. The correct date was 04-01-03.

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IV. PROCEDURE: (Applicable to individuals hired on or after November 6, 1986)

A. Employees


1. Complete Part 1 of I-9 form on the first day of work.
2. Present verification of identity and legal right to employment in the United States within three (3) business days from date of hire. Individuals who are work-authorized at the time of hire may present a receipt for application of documents, and then present the actual documents within 90 days.

B. Facility Human Resources

1. Follow employment verification process regardless of employment status.
2. You may photocopy employee's documentation of identification and authorization to work.
3. Review Employment Eligibility Verification form I-9 completed by employee for thoroughness (and accuracy), complete the employer "attestation" and Section II, may attach photocopied documentation, and maintain all I-9s in a separate file, which may be subject to investigation by the Department of Labor, the Immigration and Naturalization Service, or the Office of Special Counsel.
4. Maintain I-9s for the period specified by the Tenet Retention Schedule (see Administrative policy AD 1.11 Records Management).
5. Monitor an established tickler system and re-verify employment eligibility of all employees whose work authorization documents carry expiration dates. Update I-9 forms accordingly.

C. 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 performance management pursuant to all applicable policies and procedures, up to and including termination. Such performance management may also include modification of compensation, including any merit or discretionary compensation awards, as allowed by applicable law.

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V. REFERENCES:

- How to Conduct an I-9 Audit
- I-9 Form