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:

To provide supervisors with appropriate guidelines when responding to telephone or written requests for data from representatives or investigators of federal, state and local regulatory agencies.

III. POLICY:

It is the policy of Tenet that all communications from government agencies that affect the Human Resources area will be referred to the Human Resources Department for investigation and response.

GENERAL

Scope

For the purpose of the policy, federal and state agencies include, but are not limited to:

1. Department of Labor (DOL);
2. Federal Wage and Hour Division;
3. National Labor Relations Board (NLRB);
4. Occupational Safety and Health Administration (OSHA);
5. Immigration and Naturalization Service (INS);
6. Equal Employment Opportunity Commission (EEOC);
7. State Fair Employment Practices Agencies; and
8. Local Regulatory Agencies, if any.

1Prior to June 3, 2013, the policy number was HR-304.
Guidelines

All government inquiries must be made in writing to the Human Resources Department.

IV. PROCEDURE:

Employees and Supervisors

Refer all inquiries or requests for information from any governmental agency to the Human Resources Department.

Facility Human Resources

1. Maintain written records of agency contacts which include at least the following information:
   a. date;
   b. agency involved;
   c. agency representative's name;
   d. telephone number;
   e. manner in which contact was made; and
   f. data requested.

2. Consult with the Corporate Human Resources Department regarding appropriate response to inquiries from government agencies.

3. Where appropriate, respond to inquiries, requests for data, claims, charges, etc., received from the agency involved.

Corporate Human Resources

1. Provide guidance to facility Human Resources Departments when called upon to do so.

2. Consult with the Corporate Legal Department when necessary.

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.