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		Effective Date: 11-30-18
		Retires Policy Dated: 07-31-14
		Previous Versions Dated: 09-27-11; 10-01-09; 08-21-06; 07-14-06

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 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 outline the participation requirements for employees in Ethics and Compliance Training as established in the Quality, Compliance and Ethics Program Charter.


III. DEFINITIONS:

- A. **“Employee”** means, for the purpose of this policy, all active Tenet employees and, as appropriate, contractors, temporary staff and agents.
- B. **“Initial Training”** means Ethics and Compliance Training and any Specialized Training provided to all new Tenet Employees within the first 30 days of employment/engagement.
- B. **“Specialized Training”** means job-specific training to those Employees who work in clinical quality, coding, billing, cost reporting and/or referral source arrangements.
- D. **“Annual Training”** means Ethics and Compliance Training and any Specialized Training provided to Tenet Employees each calendar year.

IV. POLICY:

All Employees and certain other individuals, as may be identified by the Chief Compliance Officer or Compliance Officer (CO), must complete Ethics and Compliance Training in accordance with this policy. If an Employee fails to complete any required Ethics and Compliance training within the prescribed time periods outlined in this policy, the Employee must be immediately suspended without pay until such time as he or she completes the required training. This suspension will normally be treated as a formal action under Human Resources policy HR.ERW.12 Employee Performance Management. If the Employee on suspension fails to complete the required training within 15 calendar days, the CO will coordinate with the facility Human Resources Department regarding the appropriate next step in the performance management process, which may include termination of employment.

¹Prior to June 3, 2013, the policy number was HR-411.

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V. PROCEDURE:

A. Initial Training

1. Each new Employee must complete Ethics and Compliance Training, as well as Information Privacy and Security Training, within 30 calendar days of beginning employment using materials provided by the Corporate Ethics and Compliance Department. Certain job functions may be required to complete additional Specialized Training.
2. The Ethics and Compliance Training will be conducted by the CO or other individual as designated by the Chief Compliance Officer. The training will be offered at least once every 30 days to ensure that each new Employee will have the opportunity to complete the training. The schedule of Ethics and Compliance Training will be made available to employees at every Tenet Facility.

B. Annual Training


Each year of this policy, Employees must complete updated Ethics and Compliance training. The Ethics and Compliance Training will be conducted by the CO or other individual as may be designated by the Chief Compliance Officer. The schedule of Ethics and Compliance Training will be made available to employees at every Tenet Facility. Employees must complete the training by the due date established by their facility, but no later than the end of each calendar year.

C. Specialized Training

1. Employees performing certain job functions may be required to complete Specialized Training on an annual basis in addition to the Annual Training noted above.
2. A new Employee entering or transferring into a job function that requires Specialized Training must complete the required training within 30 calendar days of beginning the job.
3. The Specialized Training will be coordinated by the CO or other individual as designated by the Chief Compliance Officer.

D. Training and Auditing Processes

Each CO will coordinate with Human Resources in his/her Tenet Facility to ensure that a process is established at the Tenet Facility for:

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1. Conducting Ethics and Compliance Training within 30 calendar days of an Employee beginning employment.
2. Conducting Ethics and Compliance Training each calendar year for all Employees, using materials provided by the Corporate Ethics and Compliance Department.
3. Coordinating any Specialized Training that may be required.
4. Reporting to the Chief Compliance Officer the name of any exceptions for Employees who fail to complete the required Ethics and Compliance Training within the time frames set forth in this policy. The CO should also include an action plan for resolution to the Chief Compliance Officer.
5. Coordinating with Human Resources the suspension without pay of, or further performance management actions against, any employee who fails to complete the Ethics and Compliance Training within the time frames set forth in this policy.


Note: It is the responsibility of Corporate Ethics and Compliance Department to maintain a process as outlined above for Tenet Corporate employees.

- E. Material for Ethics and Compliance training will be published each calendar year by the Corporate Ethics and Compliance Department. The Corporate Ethics and Compliance Department will also arrange for any Specialized Training and/or related materials that may be required.
- F. The CO is responsible for ensuring that all training is tracked through Tenet's .edu training system.
- G. Leave of Absence

The CO will coordinate with Human Resources to address the training requirements for those Employees who are on approved Leaves of Absence. An Employee on an approved Leave of Absence will normally have 30 days upon return to work to complete any outstanding Ethics and Compliance Training requirements, be it annual training or specialized training.

- H. 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

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termination. Such performance management may also include modification of compensation, including any merit or discretionary compensation awards, as allowed by applicable laws.

VI. REFERENCES:

- Quality, Compliance and Ethics Program Charter
- HR.ERW.12 Employee Performance Management