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Disclosure of Hiring of Intermediary's Former Employee

I. SCOPE:

This policy applies to Tenet Healthcare Corporation, its consolidated subsidiaries and all hospitals and other healthcare operations owned or operated by Tenet's consolidated subsidiaries (Tenet).

II. PURPOSE:

To describe the process to notify the Secretary of Health and Human Services of any employee or contractor that was employed by Tenet's Medicare Fiscal Intermediary (currently Mutual of Omaha) or Carriers.

III. POLICY:


All Tenet facilities and regional and corporate offices are required to notify the Secretary of Health and Human Services within 30 days after hiring or obtaining the services of an individual who at any time during the year preceding such employment was employed in a managerial, accounting, auditing, or similar capacity by an agency or organization which currently serves, or at any time during the preceding year, served as that facility's Medicare Fiscal Intermediary or Carrier.

IV. PROCEDURE:

- A. The Human Resources Department or Contract Administrator, of the facility or regional or corporate offices will have the primary responsibility for screening all new employees or contractors, respectively, to determine if at any time during the year preceding such employment, the employee or contractor was employed in a managerial, accounting, auditing, or similar capacity by an agency or organization which currently serves, or at any time during the preceding year, served as Tenet's Medicare fiscal intermediary or carrier. Generally, such employees (or contractors) are employed (or contracted for services) in billing, accounting, auditing or financial departments, however all potential employees and contractors should be screened.
- B. In the event an employee or contractor's prior employment requires disclosure as indicated in section V., the facility or regional or corporate office Human Resources Department or Contract Administrator is responsible for notifying the Secretary of Health and Human Services within thirty (30) days of employment. A sample letter for such notification is Attachment A. A copy of this letter will be placed in the employee's personnel file. A copy of this letter will be placed in the file with the contract (or copy) for contractors.

V. BACKGROUND:

"A provider must notify the Secretary promptly if it, or its home office (in the case of a chain organization), employs or obtains the services of an individual who, at any time during the year preceding such employment, was employed in a managerial, accounting, auditing, or similar

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capacity by an agency or organization which currently serves, or at any time during the preceding year, served as a Medicare fiscal intermediary or carrier for the provider. "Similar capacity" means the performance of essentially the same work functions as those of a manager, accountant, or auditor even though the individual is not so designated by title."

42 CFR §420.203.

VI. ATTACHMENTS

- (Attachment A) Sample Notification Letter to the Secretary of Health and Human Services

VII. REFERENCES

1. 42 CFR § 420.203