

CORPORATE POLICY

Manual/Library Name: Compliance	No: COMP-RCC 3.02
	Page: 1 of 3
Title: Controls and Monitoring of Payments to Physicians or Other Referral Sources	Effective Date: 12-3-2021
	Previous Versions: 01-25-18; 11-30-12; 09-27-11; 02-01-11; 11-01-10
	Approved By: Executive Leadership Team
	Approval Date: 12-2-2021

I. Scope:

This policy applies to Tenet Healthcare Corporation and its subsidiaries and affiliates other than Conifer Holdings Inc. and its direct and indirect subsidiaries (each, an “Affiliate”), any other entity or organization in which Tenet or an Affiliate owns a direct or indirect equity interest of greater than 50%, and any entity in which an Affiliate either manages or controls the day-to-day operations of the entity (each, a “Tenet Entity”) (collectively, “Tenet”).

II. Purpose:

To establish controls and routine monitoring of payments made to physicians and other actual or potential referral sources (“Referral Sources”) through the vendor payment system. This policy does not apply to payments made to employed physicians or other employed referral sources.

III. Definitions:

Vendor: Refers to an individual, third party, or company that provides or performs certain functions, activities, or services to Tenet and requires access to internal infrastructure to provide support. These individuals are collectively referred to as Vendors and may include, but are not limited to contractors, subcontractors, agents, third parties, and business associates.

IV. Policy:

Prior to issuing a payment to a new Vendor, the Facility Chief Financial Officer (CFO), United Surgical Partners International (USPI) Facility Administrator, Tenet Physician Resources (TPR) Senior Finance Director, or designee (“Finance Designee”) shall verify whether the Vendor is a Referral Source. Facilities operated by Tenet Entities (each a “Facility”) shall follow applicable Tenet Law policies and procedures to ensure that payments made to Referral Sources are consistent with all laws and regulations.

V. Procedure:

A. New Vendors

Facilities cannot make payments to Vendors prior to the Facility CFO’s or designee’s approval of a completed Vendor Addition Form.

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	Page: 2 of 3
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As required by the Accounts Payable Vendor Maintenance Policy AP-1000 (the “Vendor Maintenance Policy”), Tenet facility shall complete an Accounts Payable Vendor Addition Form (Form AP60) for any new vendor, which, among other information, identifies whether the Vendor is a Referral Source. The Facility’s CFO or designee must approve in writing (can be digital/electronic) all Forms AP60 to ensure, among other things, that all Vendors are appropriately categorized as Referral Sources or Non-Referral Sources. This includes the completion of a Vendor Qualification Program (VQP) questionnaire or, if exempt from VQP, requestor indicates whether vendor is a Referral Source on the Form AP60. The VQP exemption code must be listed on the Form AP60 (or Vendor Change Form).

USPI: USPI Facilities cannot make payments to new Vendors prior to the Facility Administrator or designee’s approval and completion of a New Vendor Submission Form found on USPI’s intranet page, InSite. This will verify that all Vendors are appropriately categorized as Referral Sources or Non-Referral Sources. The Vendor Submission Form must be completed to ensure all required information is gathered to launch the VQP questionnaire, as applicable.

B. Procedure for Payment Approvals

Each Facility shall adhere to the following procedures for review and approval of all Referral Source payments:

1. The Facility’s Finance Designee shall review and approve all payments to Referral Sources on electronic Check Request/AP100. If the Finance Designee is unavailable, the Chief Executive Officer (CEO) or Chief Operating Officer (COO) can approve in the Finance Designee’s absence. Operations Counsel and Tenet Operations Finance or USPI CFO must authorize in writing any extended delegation in advance of review and approval of Referral Source payments.
2. The Tenet or USPI Facility shall ensure that (i) individuals responsible for approval of Referral Source payments have the requisite training on the eCATS policy; (ii) the supporting agreement has been approved in eCATS in accordance with the eCATS policy; (iii) the items or services were provided during the term of the agreement, and the amount requested complies with the terms of the agreement; and (iv) the requestor has included appropriate supporting documentation to demonstrate that the payment complies with Tenet policy.



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VI. 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.

VII. References:

- 1000 Vendor Maintenance
- EC.SOP.15.00 Referral Source Audit Process
- L-15 Electronic Contract Approval Term Sheet (eCATS)