

Creating a Culture of Compliance Through Effective Program Structure

2012 HCCA Compliance Institute

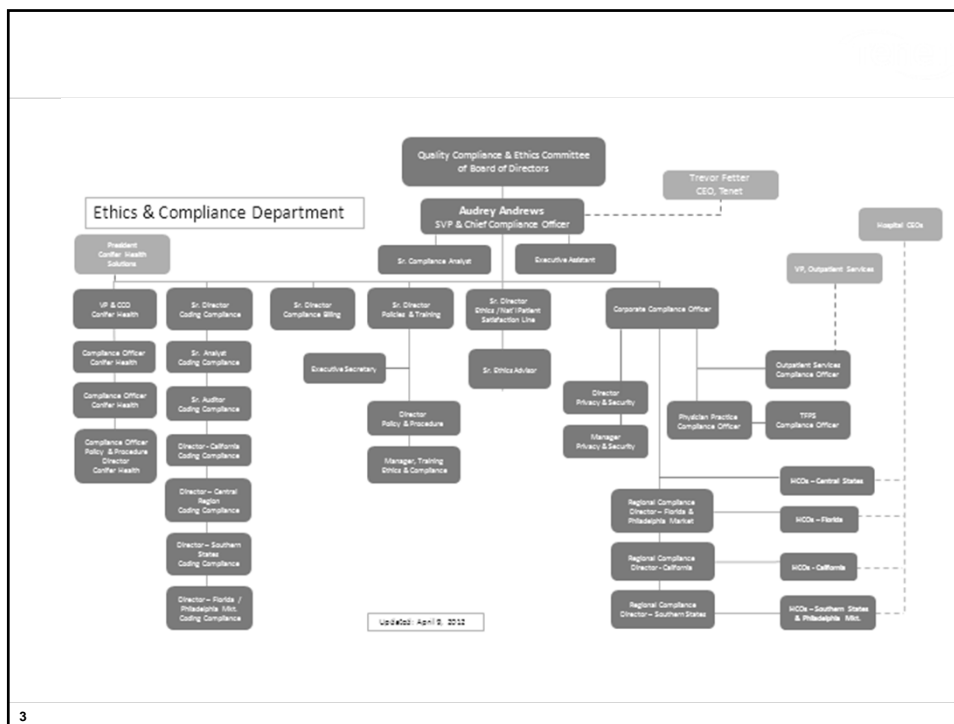
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Tenet Healthcare Corporation is one of the largest investor-owned health care delivery systems in the nation.

- 50 hospitals in 11 states
- 99 outpatient centers
- 57,000 employees
- \$8.854 billion net operating revenues (CY'11)
- 515,693 admissions (CY'11)
- 4 million outpatient visits (CY'11)

Our values: quality, integrity, service,
innovation and transparency



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Defining Compliance in Eight Key Areas

- Healthcare is compliant when it is:



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- Compliance Program Established 2004
- Decentralized Model - First for-profit health system to place independent full-time Compliance Officers in all hospitals
- Corporate Integrity Agreement (CIA) 2006-2011
- First CIA to include Quality of Care component
- Establishment of Quality, Compliance and Ethics Program Charter September 2011 (The Charter applies to any facility of business in which Tenet owns an interest of 51% or more or for which Tenet manages the day to day operations of the facility or business)

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- **Home Office** (Management Quality Compliance and Ethics Committee)
 - SVP & CCO - Chair
 - President Hospital Operations
 - SVP Quality
 - SVP Operations Finance
 - SVP General Counsel
 - SVP Human Resources
 - Deputy General Counsel
 - Corporate Compliance Officer
 - VP Audit Services
 - VP Quality Management
 - VP Safety and Risk
 - VP CNO
 - VP Government Programs
 - Senior Directors (Case Management, Ethics Action Line, Conifer Revenue Solutions)

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- Hospital
 - CEO
 - COO
 - CFO
 - CNO
 - CMO
 - HCO Chair
 - Risk Manager
 - Director Quality
 - Department Directors

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- System-wide Standards (Code) of Conduct
- Education and Training
- Hospital Leadership Certifications (quarterly)
- Collaboration with Audit Services
- Auditing and Monitoring
- Compliance Effectiveness Review (annually)
- Clinical Systems Review (annually)
- Referral Source Arrangements Review (annually)
- Screening for Exclusions (in collaboration with Human Resources)
- Management of Company Policies and Procedures
- Investigation, Response and Prevention

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- HIPAA Privacy and Security
- Deficit Reduction Act
- Quality Reportable Events and Overpayments
- Compliance Issue Management and Reporting System
- Ethics Action Line
- Enforcement and Discipline (in collaboration with Human Resources)
- Risk Assessments
- Ethics and Compliance Work Plan (annually)
- Inpatient & Outpatient Coding Audits
- Ethics and Compliance Annual Report to Tenet Board

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- Performance Standards and Incentives
 - Component of employee annual evaluation
 - Hospital Compliance Scorecard (sixteen metrics)
 - Hospital Compliance Officer Scorecard (twelve metrics)
 - Clinical Quality Measures
 - Balanced Scorecard (Company-wide including quality and operational performance metrics)
- Incentive and Bonus Awards are linked to scorecard results

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- High Level Oversight and Engagement
- Provide an Opportunity for Middle Management and Staff Participation in Compliance Activities
- Require Accountability
- Create a Culture of Teamwork
- Be Responsive
- Take Advantage of Opportunities to Build Relationships
- Prioritize based on organizations unique characteristics
- Be Visible
- Measure Effectiveness

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<http://www.tenethealth.com/about/pages/ethicscompliance.aspx>

Website Content related to Ethics and Compliance Program:

- Overview of Ethics and Compliance program
- Policies and Procedures
- Quality Compliance and Ethics Program Charter

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Questions