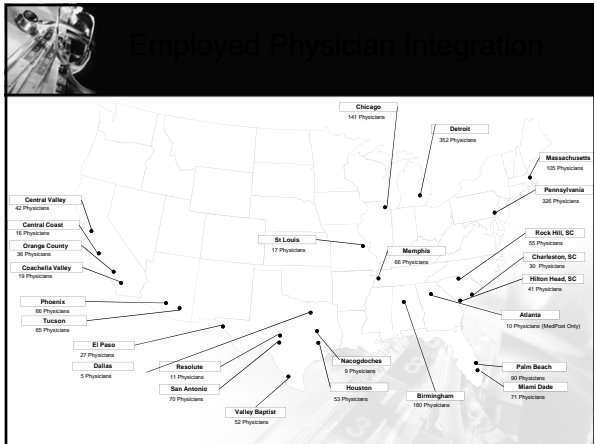
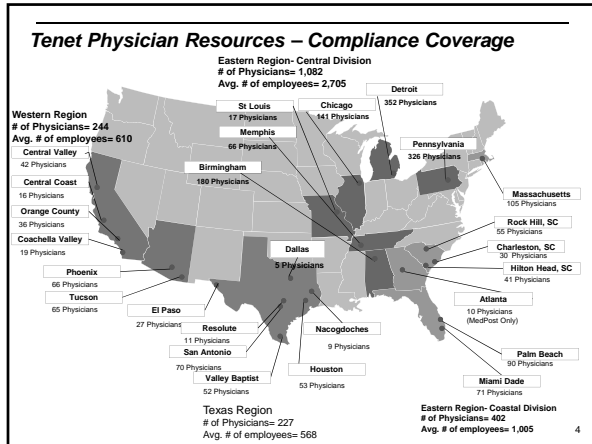



- Small Group Practices – few locations
- Market
- Regional
- National






- How to Effectively Communicate Across Practices
- Training Methods for Practices
- Initiatives For Physician Practices

- Can be difficult due to makeup of organization
 - In Person
 - Remotely
- Difficulty in getting message to physicians

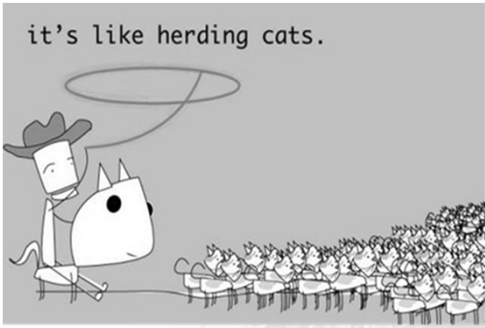


➤ Methods of Communication


- Cascade down the message
- Videos
 - ❖ New Hire Training
 - ❖ Annual Refresher Training
 - ❖ Specialized/Targeted
- Web-ex sessions
- Monthly re-occurring calls
 - ❖ Bi-Weekly Operations Call
 - ❖ Monthly Practice Managers Calls
 - ✓ Meeting recorded
 - ✓ Minutes taken



it's like herding cats.




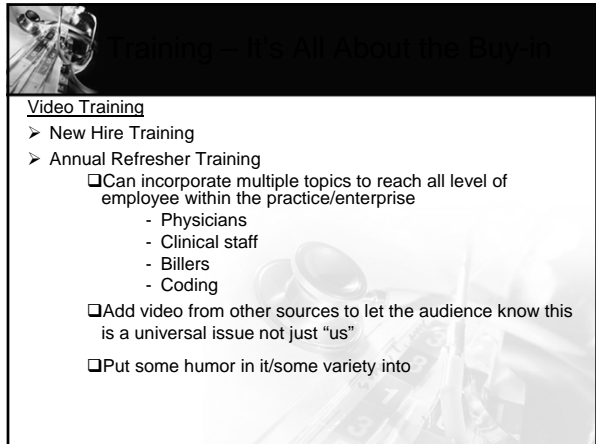
A cartoon illustration showing a cowboy on the left, holding a lasso that encircles a single white cat. In the background, a large group of many small cats is gathered together, representing a difficult task to manage.



➤ Three major ways to accomplish:

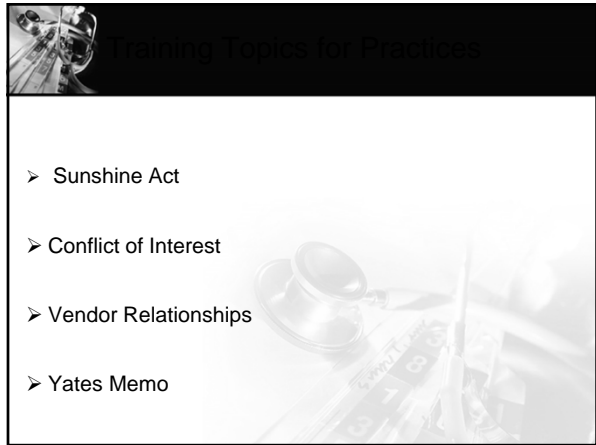
- Live
- Computer course with test
- Video



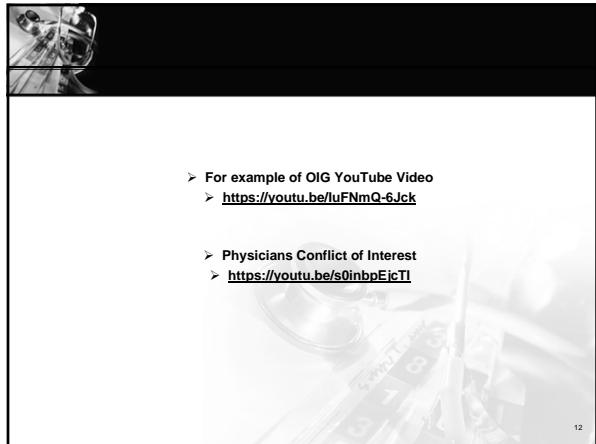


Video Training

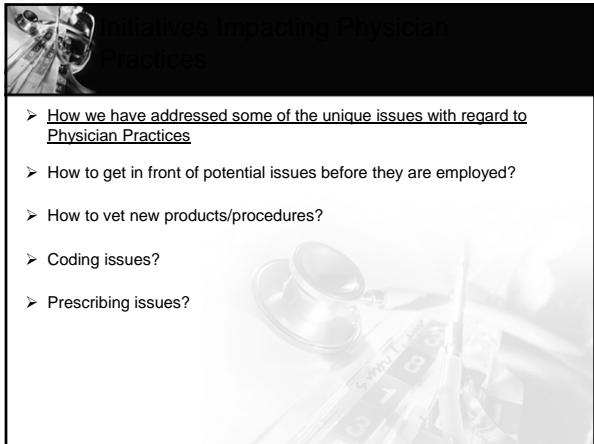
- New Hire Training
- Annual Refresher Training
 - ❑ Can incorporate multiple topics to reach all level of employee within the practice/enterprise
 - Physicians
 - Clinical staff
 - Billers
 - Coding
 - ❑ Add video from other sources to let the audience know this is a universal issue not just "us"
 - ❑ Put some humor in it/some variety into



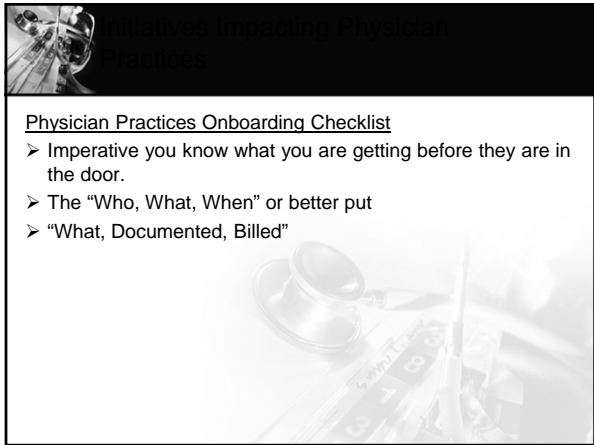
- Sunshine Act
- Conflict of Interest
- Vendor Relationships
- Yates Memo



- For example of OIG YouTube Video
 - <https://youtu.be/luFNmQ-6Jck>
 - Physicians Conflict of Interest
 - <https://youtu.be/s0inbpEicTI>

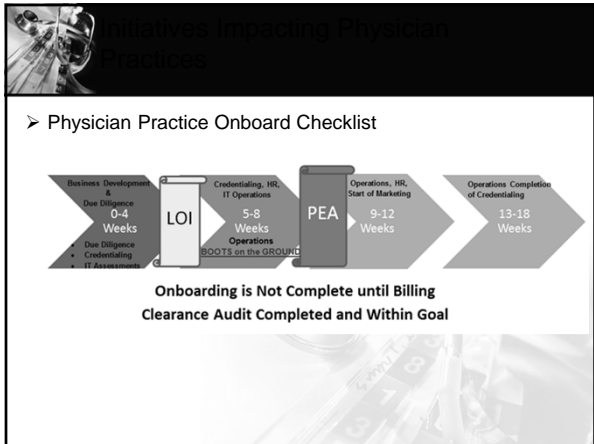


- How we have addressed some of the unique issues with regard to Physician Practices
- How to get in front of potential issues before they are employed?
- How to vet new products/procedures?
- Coding issues?
- Prescribing issues?




Physician Practices Onboarding Checklist


- Imperative you know what you are getting before they are in the door.
- The "Who, What, When" or better put
- "What, Documented, Billed"



➤ **Physician Practice Onboard Checklist**




Onboarding is Not Complete until Billing Clearance Audit Completed and Within Goal



Alternative Lines of Business


- Alternative Line of Business means any items and/or products that may not fit into traditional lines of service for the primary or specialty care practice.
- Examples –
- Supplements
- Cosmetic procedures and services
- Oncology infusion




Alternative Lines of Business

- Getting in front of it before they are hired
- Latest/greatest trend - colleague is doing it

Alternative Lines of Business Policy/Job Aid



<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">1076</td> <td style="width: 40%;">Treat Physician Resources Policies and Procedures</td> <td style="width: 10%; text-align: center;">No.</td> <td style="width: 30%; text-align: center;">EPR.QM.107.00</td> </tr> <tr> <td style="text-align: center;">Title:</td> <td style="text-align: center;">Page:</td> <td style="text-align: center;">Effective Date:</td> <td style="text-align: center;">2 of 2</td> </tr> <tr> <td style="text-align: center;">ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS</td> <td style="text-align: center;">Revised:</td> <td style="text-align: center;">Version:</td> <td style="text-align: center;">07/15/13</td> </tr> </table> <p>SCOPE: This policy applies to all physician practices owned or operated by Tenet Healthcare Corporation's consolidated subsidiaries (each, a "Tenet Physician Practice").</p> <p>II. PURPOSE: The purpose of this policy is to ensure that the Physician Practice adheres to practice, accepted standards of practice for the specialties of the practices of the Physician Practice. Further, it sets the expectations that in providing professional and medical services, the Physician Practice adheres to industry best practices and standards of care.</p> <p>III. DEFINITIONS: "Alternative Lines of Business" means any items and/or products that may not fit into traditional lines of service for the practice or specialty care practice, and that are included but not limited to the list of services attached to this Job Aid for this Policy.</p> <p>IV. POLICY: The Physician Practice must obtain the approval of the Vice President Physician Practice Management or designate the name of someone (not necessarily a physician) to review the risks and per capita payments in place. Approval must be obtained before proceeding with any expansion of services.</p> <p>V. PROCEDURE:</p> <ol style="list-style-type: none"> A. Job Aid The Physician Practice will follow the procedural steps required to obtain prior approval for the new and alternative lines of business as outlined in the job aid listed in the reference section of this policy. B. Standard Each Tenet Region will establish, and the Physician Management Executive Committee must approve performance standards for this policy. The policy job aid will include the standards. C. Responsible Parties The Physician Practice Manager or designee is responsible for ensuring that all activities of the practice are in compliance with this policy. If the Physician Practice Manager identifies non-compliance with this policy, the Practice Manager or designee will immediately report the non-compliance to this policy to the Market Operations Director or designee. 	1076	Treat Physician Resources Policies and Procedures	No.	EPR.QM.107.00	Title:	Page:	Effective Date:	2 of 2	ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS	Revised:	Version:	07/15/13	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; text-align: center;">1076</td> <td style="width: 40%;">Treat Physician Resources Policies and Procedures</td> <td style="width: 10%; text-align: center;">No.</td> <td style="width: 30%; text-align: center;">EPR.QM.107.00</td> </tr> <tr> <td style="text-align: center;">Title:</td> <td style="text-align: center;">Page:</td> <td style="text-align: center;">Effective Date:</td> <td style="text-align: center;">2 of 2</td> </tr> <tr> <td style="text-align: center;">ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS</td> <td style="text-align: center;">Revised:</td> <td style="text-align: center;">Version:</td> <td style="text-align: center;">07/15/13</td> </tr> </table> <p>D. Auditing and Monitoring The Market Operations Director or designee will audit adherence to this policy by monitoring the services being provided at the Physician Practice and ensuring that data at the Job Aid in this policy have been approved. Financial, Clinical and Quality Management will monitor the provision of services by specialty as part of normal quality review cycles and alert the Market Operations Director or designee and the Physician Practice Compliance Officer to any coding results that may warrant review against this policy and job aid.</p> <p>E. Enforcement All employees whose responsibilities are affected by this policy are expected to be familiar with the best practices and responsibilities created by this policy. Failure to comply with this policy will be subject to appropriate performance management processes as applicable, policies and procedures, up to and including termination. The performance management unit and medical authorization of compensation, including any award or discretionary compensation awards, as allowed by applicable law.</p> <p>VI. REFERENCES:</p> <p>Related Policies: Job Aid EPR.QM.107.00 Alternative Lines of Business Job Aid</p>	1076	Treat Physician Resources Policies and Procedures	No.	EPR.QM.107.00	Title:	Page:	Effective Date:	2 of 2	ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS	Revised:	Version:	07/15/13
1076	Treat Physician Resources Policies and Procedures	No.	EPR.QM.107.00																						
Title:	Page:	Effective Date:	2 of 2																						
ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS	Revised:	Version:	07/15/13																						
1076	Treat Physician Resources Policies and Procedures	No.	EPR.QM.107.00																						
Title:	Page:	Effective Date:	2 of 2																						
ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS	Revised:	Version:	07/15/13																						



TPR	Tenet Physician Resources Policy Job Aid	No.:	JA.TPR.QMC.107.00
		Page:	4 of 4
		Effective Date:	07-18-17
		Revised Job Aid Detail:	
		Previous Version Detail:	

NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS

I. POLICY DEFINITIONS:
"Alternative Line of Business" means any items and/or products that may not fit into traditional lines of service for the company or specialty care practice, and that are submitted from and licensed to the 3rd or 4th review level from the TPR Job Aid to the PRC.

II. PROCEDURE:
A. Approval Process
1. Physician Practice Operations will establish and maintain a Procedure Review Committee (PRC) under the direction of the Senior Director Physician Operations or designee, and comprised of representatives from Divisions such as Operations, Coding Compliance, Physician Practice Compliance, Regulatory Legal, Clinical Quality, and an account manager. Care and Specialty Care Physicians. Other divisions may be included or consulted as necessary including Risk Management, Safety, or others with knowledge of or subject matter expertise in the service being reviewed.
2. A Physician Practice wishing to add a new and alternative service will complete the New Alternative Line of Business form available for TPR and submit to the Market Operations Director (MOD) or designee who will obtain the approval of the Regional Director Operations or designee. Upon approval the MOD or designee will submit the Form to the Senior Director Physician Operations or designee. The PRC must have time to fully vet the service, procedure, market product, make a recommendation to Vice President Physician Practice Management ("Vice President") or designee, and allow time for the Vice President to respond to the request.
3. New Practices: The Transition or Onboarding Representative or designee for the Market will work with the Physician Practice and Physicians to complete and submit the Form to the MOD or designee within sixty (60) days of opening the practice.
4. Pending Acquisition: The Business Development and Transition or Onboarding Representative for the Market will identify any alternative services in existence at the practice or that the practice wishes to develop post-acquisition, and submit the Form to the MOD or designee within sixty (60) days prior to acquisition, with copy to the Regional Director of Operations for the Market. For an existing service, review and response will occur within two weeks of completion of document.
5. Existing Practice: The MOD or designee of an existing Physician Practice will need to submit the approved Form to the VP of the entity. A decision will be made within sixty (60) days of the Committee meeting following submission of the Form.

TPR	Tenet Physician Resources Policy Job Aid	No.:	JA.TPR.QMC.107.00
		Page:	4 of 4
		Effective Date:	07-18-17
		Revised Job Aid Detail:	
		Previous Version Detail:	

NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS

3. The Senior Director Physician Operations will notify the Vice President of all requests for Alternative Lines of Business and obtain approval in general with an evaluation of the request.
4. If approval is obtained, the PRC will evaluate the request for Alternative Lines of Business and make a recommendation to the Vice President who will make the final decision to approve or disapprove the request.
5. The Physician Practice or Practice Provider or Market Leader will not approve and/or expect insurance for or implement the product or service prior to Committee review and Vice President approval.
B. Services identified as Alternative Lines of Business
The policy includes but is not limited to the following services:
1. Cash-based services including Screenings
2. Services not routine for the physician specialty
3. Diagnostic imaging including x-ray, ultrasound, CT, MRI, mammography
4. Experimental or pending FDA approval services
5. Category III code services
6. Cosmetic procedures and services
7. Rehabilitative Therapies
8. Ambulatory Services and Supplies
9. In-home Pharmacy or Dispensary
10. Corresponding of medications
11. Oncology infusion
12. Supplements
13. Weight management (non-traditional)
14. Non-traditional Uses such as: dermal, massage therapy, aesthetician, wellness, acupuncture, chiropractic, etc.



TPR	Tenet Physician Resources Policy Job Aid	No.:	JA.TPR.QMC.107.00
		Page:	4 of 4
		Effective Date:	07-18-17
		Revised Job Aid Detail:	
		Previous Version Detail:	

NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS

15. In-office procedures requiring sedation or other procedures typically performed in a hospital or ambulatory surgery setting
16. Allergen Immunotherapy that includes practice provision of allergen extract
17. Moderate and High Complexity Laboratory testing
18. Clinical research studies (obtain PRC approval before submitting to Tenet Clinical Research Director)
19. Neurological Testing (non-oncology) including: Electromyogram (EMG), Nerve Conduction Studies (NCS), Electroencephalogram (EEG) and Intra-Operative Monitoring
20. Sleep Studies (inpatient, polysomnography or home certified sleep specialist)
21. Cardiology Testing (including ECG, exercise, cardiology, cardiology sub-specialty)
22. Vascular Studies (including cardiology, vascular)
23. Pain Management
24. Dental Medical Equipment designed by the Physician Practice
25. Other: if a new or existing service does not appear traditional for the specialty, or if there are any concerns by Market Operations about how the service is being offered, marketed, utilized, controlled for, approved, or other questions, the service should be evaluated utilizing the process detailed in this Job Aid.

III. REQUIREMENTS:
Evidence of documentation in the Market administrative files of approval via this Job Aid.

IV. STANDARDS:
No new or alternative lines of business developed for a new practice or implemented in an existing practice without prior approval of the Vice President Physician Practice Management or designee.
No acquisition approved prior to evaluation of any existing alternative lines of business including identification of services in the white paper and pro forma.

V. REFERENCES:
TPR and JA.TPR.ECS.102.00 Pro Forma Development: Letter of Intent and Renewal (pending)

TPR	Tenet Physician Resources Policy Job Aid	No.:	JA.TPR.QMC.107.00
		Page:	4 of 4
		Effective Date:	07-18-17
		Revised Job Aid Detail:	
		Previous Version Detail:	

NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS

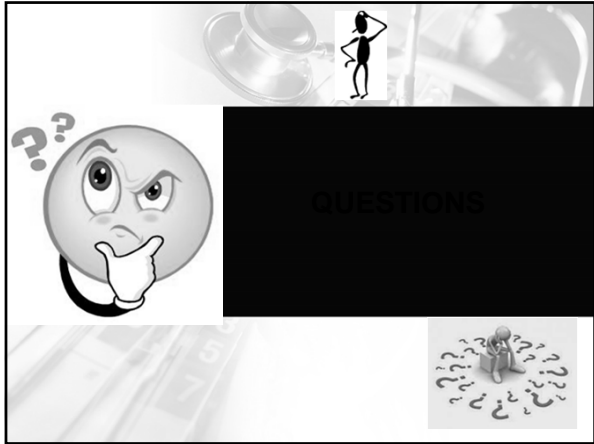
TPR and JA.TPR.QMC.108.00 Operations Due Diligence (pending)

VI. ATTACHMENTS:
ATT JA.TPR.QMC.107.00 - New or Alternative Line of Business Request Form



www.Tenethealth.com





QUESTIONS
