L-15 Electronic Contract Approval Term Sheet ("eCATS")

Frequently Asked Questions

December 9, 2010; January 1, 2012; October 26, 2012; August 27, 2013; February 1, 2017

Updated September 11, 2018

L-15 ELECTRONIC CONTRACT APPROVAL TERM SHEET ("eCATS")

FREQUENTLY ASKED QUESTIONS September 11, 2018

1. **Question:** Why do we need to upload documents beside the contract and term sheet? Aren't those all that matter?

Answer: The contract itself and term sheet are important but any other agreements or understandings, whether in writing or not, can impact whether an agreement is appropriate. The most critical documents related to government enforcement actions and settlements tend not to be the formal written agreements related to a matter, but emails and other documents which were not part of the final agreement but which shed light on the real purpose of the agreement.

2. **Question:** Aside from the agreements themselves and the term sheet, I'm not sure I understand which documents I need to upload into eCATS. Do I have to upload all my emails that mention this contract or this referral source?

Answer: No. You need to upload into eCATS any emails or documents that 1) you have sent or received, and 2) describe the transaction being entered into or the background or rationale for the specific transaction, including any emails that explain or attempt to explain why you believe the transaction makes sense for the company. On 1), if you have not sent or received an email, you are obviously not responsible for ensuring its upload. On 2), it depends on what correspondence or other documents you might have received that relate to the specific transaction. Examples of types of emails you should upload include:

- Emails or other correspondence that express a desire to enter into the transaction to secure referrals, or that urge that the transaction needs to occur to avoid losing referrals
- Internal emails with other Tenet colleagues expressing a rationale or background for why you want to enter into this transaction with this referral source
- Internal emails describing a financial business case for this transaction with this referral source
- Emails with the referral source describing why you are agreeing to particular terms being proposed
- Emails mentioning the proposed transaction and referrals from this referral source

Examples of types of documents or emails you do not need to upload include:

- Emails about logistics or other non-substantive matters
- The annual operating plan, which your Operations Counsel has access to
- Emails about the relevant service line which do not mention this transaction
- 3. **Question:** What do I do if I have questions about what to upload?

<u>Answer:</u> If you are unsure about any particular email or document, feel free to consult with your local Compliance Officer or your Operations Counsel.

4. **Question:** What do I do if I find a document after approval that I did not upload and now I think I should have?

<u>Answer:</u> Contact your Operations Counsel and let him or her know and send them the document. They will help you assess what to do with the document and next steps.

5. **Question:** When an agreement requires revision after the eCATS package has been approved and returned to the Tenet Provider, does the eCATS package need to be resubmitted?

<u>Answer:</u> Not in all cases. The Tenet Provider should contact Operations Counsel to determine if the revision requires eCATS resubmission or if Operations Counsel can approve the change via e-mail, with such approval being uploaded with the approved eCATS package. Generally, an eCATS package will not need to be re-submitted if there has not been an increase in the total compensation to be paid by the Tenet Provider.

6. **Question:** Occasionally, one of our Non-Referral Source agreements is for an indefinite period of time or has automatic renewal provisions in perpetuity without a definitive ending date. How can I account for that on the eCATS term sheet?

<u>Answer</u>: This is commonly known as an "evergreen" arrangement. The Law Department discourages these types of arrangements but understands in certain situations they exist. For eCATS purposes, the term for the agreement will generally be entered as three (3) years but in no event to exceed five (5) years. By doing this, the arrangement will at least come up on the "tickler" list in the future and the Tenet Provider can decide whether the arrangement still needs to be active or needs to be terminated.

3. **Question:** What approvals are required in eCATS if the Tenet Provider proposes to employ or otherwise enter into an agreement with a physician's immediate family member?

Answer: Immediate family members of physicians are considered referral sources under the Stark Law and Tenet policy. Therefore, advance eCATS approval is required to enter into employment or contractual arrangements with these individuals. The name of the proposed employee will be listed on the eCATS term sheet, with the physician to whom he/she is related filled in under the "Additional Physician" section. The eCATS term sheet will include the individual's expected annual base salary for the first year of their employment. Although Tenet's employment arrangements are generally at will and do not have a specific duration, these arrangements should be placed in eCATS as five year agreements.

4. **Question:** Do all Referral Source Arrangements require the inclusion of language pertaining to Tenet's Compliance Program, Standards of Conduct, policies and procedures, and Anti-Kickback Statute and Stark Law?

<u>Answer:</u> In the following <u>limited circumstances</u> the identified Referral Source Arrangements will not require one or more of the requirements.

A mangament	Doguiroment that all	Cartification by the	Doguirament that all
Arrangement	Requirement that all	Certification by the	Requirement that all
	parties shall comply with Tenet's	parties that they shall	parties complete any
		not violate the (a) Anti-	training required under
	Compliance Program, Standards on Conduct	Kickback Statute, and	Tenet's Compliance
		(b) the Stark Law, if	Program
	and Tenet's policies and	applicable	
	procedures related to the Anti-Kickback Statute		
	and the Stark Law		
D'11 - f C-1-		Y ¹	NI
Bill of Sale	N		N
Settlement Agreement	N	Y	N
Loan Agreement	N	Y	N
Request for	N	Y	N
Reimbursement		**	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
Asset Purchase	N	Y	N
Agreement			
Line of Credit	N	Y	N
CME Speaker	N	Y	N
Tenet Entity Providing	N	Y	N
Service to a Non-Tenet			
Referral Source			
Tenet Entity Selling	N	Y	N
Items to a Non-Tenet			
Referral Source			
Agreements limited to:	N	Y	N
(1) a onetime event; (2)			
Recruitment Dinner			
letters; (3) CME			
program; (4)			
Replacement of lost			
item; (5) Physician Visit			
Reimbursement; or (6)			
Physician Treatment of			
Persons Injured on			
Premises.			
Shared Marketing	N	Y	N
Agreement			
Transfer Agreements	N	Y	N
Donation Agreement	N	Y	N
Confidentiality	N	N	N
Agreement			

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¹ Not needed if it is contained in an ancillary Asset Purchase Agreement

Arrangement	Requirement that all parties shall comply with Tenet's Compliance Program, Standards on Conduct and Tenet's policies and procedures related to the Anti-Kickback Statute and the Stark Law	Certification by the parties that they shall not violate the (a) Anti-Kickback Statute, and (b) the Stark Law, if applicable.	Requirement that all parties complete any training required under Tenet's Compliance Program
Managed Care Agreements:			
Physician Participation Agreement	N	Y	N
Tenet Entity Sharing Financial Risk with a Referral Source ²	N	Y	N
Registration for Tenet employee(s) to attend continuing ed. programs	N	N	N
Data Use Agreement	N	Y	N

5. <u>Question</u>: With respect to Tenet employed individuals, how are continuing education programs handled if the education is being provided by a <u>referral source</u>?

Answer: If a continuing education program is being offered by a referral source entity, but the entity is either a hospital, university, or a nonprofit organization dedicated to the advancement of health activities (e.g., American Red Cross, AHA), the application does not require approval in eCATS prior to execution so long as (1) the continuing education program is also being offered to one or more non-Tenet providers, (2) the continuing education program is being offered to the Tenet Provider on the same terms as any non-Tenet provider, and the application for the program is less than \$10,000.00. Such information must be stated in the Business Memo. After execution, a copy of the application and any accompanying program description shall be uploaded by the Tenet Provider in eCATS. In eCATS, please choose Agreement Group "Miscellaneous Agreement" and Agreement Type "Continuing Education – Referral Source (Hospital only –Standard)." It will automatically archive in the eCATS system following approval by the Tenet Provider CEO.

IPĀ.

² Limited to an agreement between a Tenet Hospital and either a Medical Group (MG) or Independent Practice Association (IPA) whereby a risk pool is funded by capitation received by a Tenet hospital from a managed care plan. Funds in the risk pool are to pay for hospital services provided to patients assigned to the MG or IPA by the same managed care plan. The hospital's claims for these services are paid out of the "pool" of capitation; any surplus or deficit at the end of the applicable calculation period is shared between the Tenet hospital and the MG or

If the continuing education program is being offered by a referral source (1) other than a hospital, university, or a nonprofit organization dedicated to the advancement of health activities, (2) the continuing education program is either (a) not being offered to non-Tenet providers, or (b) not being offered to the Tenet Provider on the same terms as the non-Tenet provider, the application may not be completed until an eCATS package has been routed in the eCATS system for approval by the Operations Counsel. In eCATS, please choose Agreement Group "Miscellaneous Agreement" and Agreement Type "Referral source (non-Hospital OR Hospital non-Standard)."

Nothing precludes a Tenet Provider from entering into a written Services Agreement (or another applicable agreement) with a referral source for ongoing education. In such instance the agreement would be uploaded in eCATS as a referral source agreement and it will route according to the eCATS policy. Non-Referral Source Agreements for ongoing continuing education should be processed consistent with Non-Referral Source arrangements.

Agreement Group Agreement Type

Miscellaneous Agreement Continuing Education – Referral Source (Hospital

only - Standard)

Miscellaneous Agreement Continuing Education – Referral Source (non-

Hospital OR Hospital non-Standard)

With respect to Tenet employed individuals, how are continuing education programs handled if the education is being provided by a non-referral source?

If a continuing education program is being offered by a non-referral source, the application does not require approval in eCATS prior to execution so long as it is less than \$10,000. In eCATS, please choose Agreement Group "Miscellaneous Agreements" and Agreement Type "Non-Referral Source Agreement." It will route in accordance with the dollar limit threshold for Non-Referral Source Agreements in section V.A.2 of the policy.

The chart below shows how various Agreement Groups and Types will flow in the eCATS system subject to the exceptions noted in the eCATS Policy. The following definitions apply for purposes of the chart:

- 1. <u>Conditional Review</u>: Receive additional review by Tenet Quality Management (QM), Tenet Clinical Asset Management (TCAM) or other Tenet department, as needed.
- 2. **Archive Only:** Reviewed by Tenet Provider CEO and then automatically archived without further review and approval.
- 3. <u>Always Legal and Fiscal Rule Driven</u>: Always reviewed by Operations Counsel and will also be fiscal rule driven as described below. Will also be reviewed by Tenet's Treasurer if the value of the package is \$500,000 or more. Generally speaking this category of review is for lease agreements.
- 4. **Region, Legal and Assistant General Counsel only:** Always go to Region Operations/Finance, Operations Counsel and Assistant General Counsel (AGC)/GC. They will not go beyond Region Operations/Finance to Tenet's Senior Vice President of Operations Finance, Tenet's Chief Operating Officer or Tenet's Chief Executive Officer. Formerly, this flow was primarily utilized for physician employment agreements.
- Always Region and Legal: Always go to Operations Counsel regardless of dollar amount; if \$10,000 or above will go to Region Operations/Finance; if \$2,500,000 or above it will go to Tenet's SVP of Operations Finance and Tenet's Chief Operating Officer; and if \$25,000,000 or above to Tenet's CEO or designee. Generally speaking this category of review is for referral source agreements not receiving Region email pre-approval. Further, for Physician Employment Agreement packages the flow will be: the Tenet employing entity authorized person; assigned legal counsel; Tenet Physician Resources (TPR) Vice President of Finance; TPR Vice-President of Business Development or Vice-President of Operations (as applicable); TPR Senior Vice-President; and if the total package amount is \$5,000,000 or above, will also be reviewed by the appropriate Tenet Law Department AGC; Tenet's Senior Vice-President of Operations Finance; Tenet's President of Hospital Operations; and if the total package amount is \$25,000,000 or above, will be further reviewed by Tenet's Chief Financial Officer or designee.
- 6. **Fiscal Rule Driven:** If the total package dollar amount is: under \$500,000 it will only be archived after approval by the Tenet Provider CFO and CEO; at least \$500,000 but under \$2,500,000 it will be reviewed by Region Operations/Finance; \$1,000,000 or greater it will be reviewed by Operations Counsel; \$2,500,000 or greater it will be reviewed by Tenet's SVP of Operations Finance and Tenet's Chief Operating Officer; \$25,000,000 or greater, it will be reviewed by Tenet's Chief Executive Officer or designee. Generally speaking this category of review is for non-referral source agreements.

- 7. <u>Facility and Legal Only</u>: Route through Facility and Operations Counsel and is generally utilized when Region email preapproval has been obtained.
- 8. **Facility and Legal Only (prior eCER approval):** These agreement types are distinguishable as they have "(prior eCER approval") in the name. Generally, these agreement types have already received business review and approval through the eCER process and will only receive legal review through eCATS if the package amount is \$1 million or more.
- 9. <u>Always MC Legal</u>: Commence with the Managed Care Contract Administrator and proceed to the Managed Care Negotiator, Managed Care Operations AVP/Director, Tenet Provider CFO, Tenet Provider CEO, Managed Care Paralegal (consult review only), Managed Care Counsel, Operations VP Finance/CFO, and Operations VP Operations/CEO for review and approval. These agreements are also fiscal rule driven if the contract amount equals or exceeds \$1,000,000. In that instance, the package will flow to Managed Care VP Operations prior to the Tenet Provider CFO, etc.
- 10. <u>Always AGC and Corporate</u>: Will always go to Operations Counsel, Region Operations/Finance, AGC Operations/GC, Tenet's SVP of Operations Finance, and Tenet's Chief Operating Officer. Formerly, this category of review was for physician employment agreements.
- 11. <u>Clinical Research Flow:</u> These packages will go from the Tenet Provider Contracts Administrator to the Tenet Director of Clinical Research in the Tenet Quality Management Department and return to the Contracts Administrator.

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Affiliation Agreements	Affiliation Agreement – Non- Standard			x								
Affiliation Agreements	Affiliation Agreement - Standard		Х									
Corporate Departments	Accounts Payable		Х									
Corporate Departments	Acquisition & Development		Х									
Corporate Departments	Administrative Services		Х									

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Corporate Departments	Audit Services		Х									
Corporate Departments	Business Development Corporate		Х									
Corporate Departments	Business Development & Marketing – Tenet CA		Х									
Corporate Departments	Call Center		Х									
Corporate Departments	Capital & Property Accounting		Х									
Corporate Departments	Clinical Quality		Х									
Corporate Departments	Communications Center		X									
Corporate Departments	Communications Materials		Х									
Corporate Departments	Compliance		Х									
Corporate Departments	Corporate Security		Х									
Corporate Departments	Corporate Sourcing/MRM		Х									
Corporate Departments	Executive Offices		Х									
Corporate Departments	Field Accounting Support		Х									
Corporate Departments	Finance		Х									
Corporate Departments	Financial Reporting		Х									
Corporate Departments	Government Programs		Х									

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Corporate Departments	Government Relations		Х									
Corporate Departments	Human Resources		Х									
Corporate Departments	Information Security		Х									
Corporate Departments	Information Systems		Х									
Corporate Departments	Law		Х									
Corporate Departments	Learning Services		Х									
Corporate Departments	Managed Care		Х									
Corporate Departments	Operational Accounting		Х									
Corporate Departments	Operations Excellence		Х									
Corporate Departments	Operations Finance		Х									
Corporate Departments	Operations Marketing		Х									
Corporate Departments	Outpatient Services Division		Х									
Corporate Departments	Patient Access		Х									
Corporate Departments	Patient Care Services		Х									
Corporate Departments	Conifer Health Solutions		Х									
Corporate Departments	Payroll		Х									

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Corporate Departments	Records Management		Х									
Corporate Departments	Reimbursement Services		Х									
Corporate Departments	Relocation Services		Х									
Corporate Departments	Risk Management		Х									
Corporate Departments	Tax		Х									
Corporate Departments	Tenet Healthcare Foundation		Х									
Corporate Departments	Texas Region		X									
Corporate Departments	Travel Administration		Х									
Corporate Departments	Treasury		Х									
Corporate Operating Leases	Equipment Leases (Exception)						Х					
Corporate Operating Leases	Hospital Building						Х					
Corporate Operating Leases	Interim Rentals – Rent Equipment						Х					
Corporate Operating Leases	Master Lease Guarantee Expense						Х					
Corporate Operating Leases	Medical Office Building						Х					
Corporate Operating Leases	Miscellaneous						Х					
Corporate Operating Leases	REIT						Х					

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Corporate Operating Leases	Rent - Automotive						X					
Corporate Operating Leases	Rent – Buildings (Except Hospital)						Х					
Corporate Operating Leases	Rent – Copiers/Fax Machines						Х					
Corporate Operating Leases	Rent – Medical Equipment						Х					
Corporate Operating Leases	Rent - Office Furniture/Equipment						Х					
Corporate Operating Leases	Rent – Office Space						Х					
Corporate Operating Leases	Rent – Outpatient Activities						Х					
Corporate Operating Leases	Rent – Records Storage						Х					
Corporate Operating Leases	Rent – Telephone Systems						Х					
Corporate Operating Leases	Rental – Income Real Estate						Х					
Corporate Operating Leases	Rental – Expenses Inter- Company (Real)						Х					
Corporate Operating Leases	Rental – Income - Equipment						Х					
Directorship Agreements	Medical Director Agreement – Director Employed by or Affiliated with a Group – Skilled Nursing Unit	QM						X ¹				

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¹ If it is a NEW directorship agreement, the package will flow as "Always Region & Legal"

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Directorship Agreements	Medical Director Agreement – Individual - Skilled Nursing Unit	QM						X ¹				
Directorship Agreements	Clinical Directorship Agreement - Psychiatric Facility	QM						X ¹				
Directorship Agreements	Directorship Agreement - Acute Care Hospital - Director Employed By Group							X¹				
Directorship Agreements	Directorship Agreement - Acute Care Hospital - Individual Physician							X ¹				
Directorship Agreements	Directorship Agreement - Bariatric - Director Employed by Group	QM						X ¹				
Directorship Agreements	Directorship Agreement - Bariatric - Individual Physician	QM						X ¹				
Directorship Agreements	Directorship Agreement - Wound Care/Hyperbaric Oxygen Treatment - Director Employed by Group	QM						X ¹				
Directorship Agreements	Directorship Agreement - Wound Care/Hyperbaric Oxygen Treatment - Individual Physician	QM						X¹				
Directorship Agreements	Medical Director Agreement – Corporation – Psychiatric Facility	QM						X ¹				
Directorship Agreements	Medical Director Agreement – Corporation- Rehabilitation Hospital	QM						X¹				
Directorship Agreements	Medical Director Agreement – Individual – Psychiatric Facility	QM						X¹				

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¹If it is a NEW directorship agreement, the package will flow as "Always Region & Legal"

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Directorship Agreements	Medical Director Agreement – Individual – Rehabilitation	QM						X ¹				
Directorship Agreements	Hospital/Unit Physician Advisor Agreement – Acute Care Hospital – Physician Employed by Group							X ¹				
Directorship Agreements	Physician Advisor Agreement – Acute Care Hospital – Individual Physician							X ¹				
Directorship Agreements	Program Medical Director Agreement – Corporation – Psychiatric Facility	QM						X ¹				
Directorship Agreements	Program Medical Director Agreement – Individual – Psychiatric Facility	QM						X ¹				
Directorship Agreements	Program Medical Director Agreement – Individual – Rehabilitation Hospital/Unit	QM						Χ¹				
Home Health Agreements	Home Health Directorship Agreement					Х						
Home Health Agreements	Therapy Services Agreement – Group					X						
Home Health Agreements	Therapy Services Agreement – Individual					X						
Hospice Agreements	Hospice Consulting Services Agreement – Group					Х						
Hospice Agreements	Hospice Consulting Services Agreement – Individual					Х						

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¹ If it is a NEW directorship agreement, the package will flow as "Always Region & Legal"

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Hospice Agreements	Hospice Directorship Agreement					Х						
Hospice Agreements	Hospice Directorship Agreement [Director Employed by Hospital]					Х						
Hospice Agreements	Skilled Nursing Hospice Services Agreement					Х						
Hospice Agreements	Inpatient/Respite Hospice Services Agreement					Х						
Hospital Based Agreements	Agreement for Anesthesiology Department Coverage – Group			х								
Hospital Based Agreements	Agreement for Anesthesiology Department Coverage – Individual			х								
Hospital Based Agreements	Agreement for Anesthesiology Department Coverage [Physicians and CRNAs]			х								
Hospital Based Agreements	Agreement for Emergency Department Coverage – Group			x								
Hospital Based Agreements	Agreement for Neonatology Department Coverage (Group)			х								
Hospital Based Agreements	Agreement for Neonatology Department Coverage (Individual)			х								
Hospital Based Agreements	Agreement for Pathology Department Coverage – Group			х								
Hospital Based Agreements	Agreement for Pathology Department Coverage – Individual			х								
Hospital Based Agreements	Agreement for Radiology Department Coverage – Group			х								
Hospital Based Agreements	Agreement for Radiology Department Coverage –			х								

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
	Individual											
Hospital Based Agreements	Coverage Agreement (not otherwise classified) – Group			х								
Hospital Based Agreements	Coverage Agreement (not otherwise classified) – Individual			х								
Hospital Based Agreements	Emergency Room On- Call Panel Services Agreement							X				
Hospital Based Agreements	Inpatient Management Services Agreement/Hospitalist Agreement			x								
Hospital Based Agreements	Non-Invasive Cardiology Panel Agreement – Direct Pay – Group							X				
Hospital Based Agreements	Non-Invasive Cardiology Panel Agreement – Direct Pay – Individual							X				
Hospital Based Agreements	Non-Invasive Cardiology Panel Agreement – Separate Billing – Group							X				
Hospital Based Agreements	Non-Invasive Cardiology Panel Agreement – Separate Billing – Individual							Х				
Joint Venture Agreements ²	Miscellaneous		X									
Leases	Assignment of Lease – Non-Referral Source			Х								
Leases	Assignment of Lease – Referral Source			Х								

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² These Agreements follow a paper approval process outlined in the relevant Law Department policy. Such approvals are to be uploaded to the eCATS package for archiving.

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Leases	Equipment Lease – Non- Referral Source			Х								
Leases	Equipment Lease – Non- Referral Source (prior eCER approval)								X			
Leases	Equipment Lease – Referral Source			X								
Leases	Office Building Sublease – Non-Referral Source			Х								
Leases	Office Building Sublease – Referral Source			X								
Leases	Office Building Time Share Lease – Non- Referral Source			X								
Leases	Office Building Time Share Lease – Referral Source			Х								
Leases	Office Building Time Share Sublease – Non- Referral Source			Х								
Leases	Office Building Time Share Sublease – Referral Source			Х								
Leases	Standard Lease Agreement –Non-Referral Source			Х								
Leases	Standard Lease – Non- Referral Source (prior eCER approval)								X			
Leases	Standard Lease Agreement –Referral Source			Х								
Letter Agreements	Governing Board Appointment Letters-Lay Member							Х				
Letter Agreements	Governing Board Appointment Letters- Referral Source							Х				
Letter Agreements	Physician Recruitment Dinner Letters		X									

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Letter Agreements	Physician Treatment of Persons Injured on Premises Letters		Х									
Letter Agreements	Physician Replacement of Patient Lost Item Letters		Х									
Letter Agreements	Physician Visit Reimbursement Letters		Х									
Letter Agreements	Tenet Sponsored Physician Event Letters (Prior AGC Approval)		Х									
Letter Agreements	Tenet Sponsored Physician Event Letters (Other)							X				
Letter Agreements	CME Speaker Letters (Physician not on staff or in service area)		Х									
Letter Agreements	CME Speaker Letters (Physician on staff or in service area)							Х				
Letter Agreements	Physician Leadership Appointment Letters		Х									
Licenses & Accreditations	Hospital License		X									
Licenses & Accreditations	Imaging/Radiology Licenses and Certificates		Х									
Licenses & Accreditations	JCAHO/AOA Accreditation		X									
Licenses & Accreditations	Laboratory Licenses and Certificates		Х									
Licenses & Accreditations	Other		Х									
Licenses & Accreditations	Pharmacy Licenses and Certificates		Х									
Licenses & Accreditations	Plant Operations		Х									

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal	Region, Legal	Always Region	Fiscal Rule-	Facility &	Facility & Legal	Always MC	Always AGC &	Clinical Research
		Keview	Omy	& Fiscal Rule Driven	and AGC Only	& Legal	Driven	Legal Only	Only (prior eCER approval)	Legal	Corporate	Research
Licenses &	Rehab: CARF		Х						, ,			
Accreditations	Accreditation											
Licenses & Accreditations	Specialty Program Licenses and Certificates		Х									
Licenses & Accreditations	Vehicle Registration		Х									
Loan Agreements	One Payment Promissory Note					X						
Loan Agreements	Promissory Note					Х						
Loan Agreements	Security Agreement					Х						
Managed Care Agreements	Ancillary Contracts – Individual					Х						
Managed Care Agreements	Ancillary Contracts – Corporation					Х						
Managed Care Agreements	Vendor aka Subcontracts – Individual					Х						
Managed Care Agreements	Vendor aka Subcontracts – Corporation					Х						
Managed Care Agreements	Accounts Receivable Assignment Agreements – Individual					Х						
Managed Care Agreements	Accounts Receivable Assignment Agreements - Corporation					X						
Managed Care Agreements	Capitated Hospital Services Contracts with Health Plan – Physician Owned Corporation									Х		
Managed Care Agreements	Non-Cap Hospital Services Contracts with Health Plan - Physician Owned Corporation									Х		
Managed Care Agreements	Reciprocity Agreement with Health Plan									Х		

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
	Physician Owned Corporation											
Managed Care Agreements	Non-Cap Hospital Services Contracts with Government									Х		
Managed Care Agreements	Physician Hospital Organization Agreement - Corporation									Х		
Managed Care Agreements	Risk Pool Agreement – Individual									Х		
Managed Care Agreements	Risk Pool Agreement – Corporation									Х		
Managed Care Agreements	Management Service Agreement - Group/PA Operations – Individual									Х		
Managed Care Agreements	Management Service Agreement - Group/PA Operations - Corporation									Х		
Managed Care Agreements	Miscellaneous Service Provider Agreement – Individual									Х		
Managed Care Agreements	Miscellaneous Service Provider Agreement – Corporation									Х		
Managed Care Agreements	MSO Management Service Agreement – Group/IPA Operations – Individual									X		
Managed Care Agreements	MSO Management Service Agreement – Group/IPA Operations - Corporation									Х		
Managed Care Agreements	MSO Miscellaneous Service Provider Agreement – Individual									Х		
Managed Care Agreements	MSO Miscellaneous Service Provider Agreement – Corporation									Х		
Miscellaneous Agreements	Ambulance Services Agreement					Х						

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Miscellaneous Agreements	Donation Agreement – Non-Referral						Х					
Miscellaneous Agreements	Donation Agreement – Referral					Х						
Miscellaneous Agreements	Non-Referral Source Agreement						Х					
Miscellaneous Agreements	Non-Referral Source Agreement (prior eCER approval)								Х			
Miscellaneous Agreements	Employee Related to Physician Arrangement					X						
Miscellaneous Agreements	Referral Source Agreement					Х						
Miscellaneous Agreements	Referral Source Request for Reimbursement					Х						
Miscellaneous Agreements	Shared Marketing Agreement					Х						
Physician Employment Agreements	Asset Purchase Agreement					Х						
Physician Employment Agreements	Line of Credit					Х						
Physician Employment Agreements	Management Services Agreement					Х						
Physician Employment Agreements	Physician Employment Agreement					Х						
Physician Employment Agreements	Physician Acquisition Package					X						
Purchase and Sale Agreements	Bill of Sale (Hospital as Buyer) –Non-Referral						Х					
Purchase and Sale Agreements	Bill of Sale (Hospital as Buyer) –Referral					X						

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal &	Region, Legal and	Always Region &	Fiscal Rule- Driven	Facility & Legal	Facility & Legal Only	Always MC Legal	Always AGC & Corporate	Clinical Research
				Fiscal Rule Driven	AGC Only	e Legal		Only	(prior eCER approval)	Legai	Corporate	
Purchase and Sale Agreements	Bill of Sale (Hospital as Seller) –Non-Referral						Х					
Purchase and Sale Agreements	Bill of Sale (Hospital as Seller) –Referral					Х						
Purchase and Sale Agreements	Bill of Sale (Used Equipment Release) – Non-Referral Source						Х					
Purchase and Sale Agreements	Bill of Sale (Used Equipment Release) – Referral Source					Х						
Purchase and Sale Agreements	Purchase Asset Agreement –Non-Referral Source						Х					
Purchase and Sale Agreements	Purchase Asset Agreement –Referral Source					Х						
QM Agreements	Employee Leasing Agreement	QM				Х						
QM Agreements	Management Services Agreement – Curative	QM				Х						
QM Agreements	Management Services Agreement – Generic	QM				Х						
QM Agreements	Management Services Agreement – Horizon – Generic	QM				Х						
QM Agreements	Management Services Agreement – Horizon – Rehab	QM				X						
QM Agreements	Management Services Agreement – Rehabcare Group, Inc.	QM				Х						
QM Agreements	Management Services Agreement – VitalCare America	QM				Х						
QM Agreements	Management Services Agreement – Wound Care	QM				Х						
QM Agreements	Psychiatric Evaluation Services Agreement	QM				Х						

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Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal &	Region, Legal and	Always Region &	Fiscal Rule- Driven	Facility & Legal	Facility & Legal Only	Always MC Legal	Always AGC & Corporate	Clinical Research
				Fiscal Rule	AGC Only	Legal		Only	(prior eCER			

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Relocation Agreements	Recruitment Agreement - Three Party					X						
Relocation Agreements	Recruitment Agreement - Two Party					Х						
Relocation Agreements	Relocation Agreement - Three Party					Х						
Relocation Agreements	Relocation Agreement - Two Party					Х						
Research Agreements	Clinical Trials under Master Agreements											Х
Research Agreements	Clinical Trial Agreement (2 party)	QM				Х						
Research Agreements	Clinical Trial Agreement (3 party)	QM				X						
Research Agreements	Confidentiality Agreement	QM				X						
Research Agreements	CRO Agreements	QM				X						
Research Agreements	External Institutional Review Board Agreements	QM				Х						
Research Agreements	Indemnification Agreement	QM				Х						
Research Agreements	Miscellaneous Research Agreement	QM				X						
Research Agreements	Research Services Subcontract Agreement	QM				Х						
Resident Related Agreements	Clinical Rotation Agreement					Х						
Resident Related Agreements	Miscellaneous Resident Related Agreement					Х						
Resident Related Agreements	Residency Cap Affiliation Agreement					Х						
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Resident Related Agreements	Resident Employment Agreement					Х						
Resident Related Agreements	Resident Moonlighting Agreement					Х						
Resident Related Agreements	Resident Stipend Agreement					Х						
Resident Related Agreements	Resident Supervision Agreement					Х						
Resident Related Agreements	Resident Stipend and Supervision Agreement					Х						
Resident Related Agreements	Shared Rotation Agreement					Х						
Services Agreements	Coding Services Agreement					Х						
Services Agreements	Consulting Services Agreement (Non- Referral)						Х					
Services Agreements	Consulting Services Agreement (Referral)					Х						
Services Agreements	(Med3000) Management Agreements		Х									
Services Agreements	Non-Referral Source Services Agreement - Corporation						Х					
Services Agreements	Non-Referral Source Services Agreement – Corporation (prior eCER approval)								Х			
Services Agreements	Non-Referral Source Services Agreement - Individual						Х					
Services Agreements	Non-Referral Source Services Agreement – Individual (prior eCER approval)								Х			

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Services Agreements	Physician Participation Agreement (Managed Care Global)					Х						
Services Agreements	Psychotherapist Agreement - Individual - Psychiatric Facility					X						
Services Agreements	Recruitment Services Agreement						X					
Services Agreements	Referral Source Services Agreement - Corporation					Х						
Services Agreements	Referral Source Services Agreement - Individual					Х						
Services Agreements	Security Services Agreement						Х					
Services Agreements – Department Outsourcing	Biomed – Referral Source	TCAM				Х						
Services Agreements – Department Outsourcing	Biomed – Non-Referral Source	TCAM					X					
Services Agreements – Department Outsourcing	EVS/Housekeeping – Referral Source	TCAM				Х						
Services Agreements – Department Outsourcing	EVS/Housekeeping – Non-Referral Source	TCAM					X					
Services Agreements – Department Outsourcing	Facilities/Plant Operations- Referral Source	TCAM				Х						
Services Agreements – Department Outsourcing	Facilities/Plant Operations – Non- Referral Source	TCAM					X					
Services Agreements – Department	Food and Nutrition – Referral Source	TCAM				Х						

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Outsourcing												
Services Agreements – Department Outsourcing	Food and Nutrition – Non-Referral Source	TCAM					Х					
Services Agreements – Department Outsourcing	Multi – Service – Referral Source	TCAM				Х						
Services Agreements – Department Outsourcing	Multi – Service – Non- Referral Source	TCAM					Х					
Services Agreements – Department Outsourcing	Other – Referral Source	TCAM				х						
Services Agreements – Department Outsourcing	Other – Non-Referral Source	TCAM					X					
Services Agreements – Department Outsourcing	Patient Transport – Referral Source	TCAM				Х						
Services Agreements – Department Outsourcing	Patient Transport – Non- Referral Source	TCAM					Х					
Services Agreements – Department Outsourcing	Security – Referral Source	TCAM				Х						
Services Agreements – Department Outsourcing	Security – Non-Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Angiography – Referral Source	TCAM				Х						

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Services Agreements – Imaging/Radiology	Angiography – Non Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Catheterization Laboratory – Referral Source	TCAM				X						
Services Agreements – Imaging/Radiology	Catheterization Laboratory – Non- Referral Source	TCAM					X					
Services Agreements – Imaging/Radiology	Computed Tomography (CT) Imaging – Referral Source	TCAM				Х						
Services Agreements – Imaging/Radiology	Computed Tomography (CT) Imaging – Non- Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Digital Mammography - Referral Source	TCAM				Х						
Services Agreements – Imaging/Radiology	Digital Mammography – Non-Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Digital Radiography - Referral Source	TCAM				Х						
Services Agreements – Imaging/Radiology	Digital Radiography – Non-Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Electrophysiology – Referral Source	TCAM				X						
Services Agreements – Imaging/Radiology	Electrophysiology – Non- Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Magnetic Resonance Imaging - Referral Source	TCAM				Х						
Services Agreements – Imaging/Radiology	Magnetic Resonance Imaging – Non-Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Nuclear Medicine – Referral Source	TCAM				X						

Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Services Agreements – Imaging/Radiology	Nuclear Medicine – Non- Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Other Imaging/Radiology – Referral Source	TCAM				Х						
Services Agreements – Imaging/Radiology	Other Imaging/Radiology – Non-Referral Source	TCAM					Х					
Services Agreements – Imaging/Radiology	Radiography/Fluoroscopy – Referral Source	TCAM				Х						
Services Agreements – Imaging/Radiology	Radiography/Fluoroscopy - Non-Referral Source	TCAM					X					
Services Agreements – Imaging/Radiology	Ultrasound – Referral Source	TCAM				X						
Services Agreements – Imaging/Radiology	Ultrasound – Non- Referral Source	TCAM					X					
Services Agreements – Laboratory Equipment	Laboratory Equipment – Referral Source	TCAM				Х						
Services Agreements – Laboratory Equipment	Laboratory Equipment – Non-Referral Source	TCAM					X					
Services Agreements – Non-Medical Equipment	Non-Medical Equipment – Referral Source	TCAM				Х						
Services Agreements – Non-Medical Equipment	Non-Medical Equipment – Non-Referral Source	TCAM					Х					
Services Agreements – Other Medical Equipment	Other Medical Equipment - Referral Source	TCAM				X						
Services Agreements –	Other Medical Equipment – Non-Referral Source	TCAM					Х					

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Agreement Group	Agreement Type	Conditional Review	Archive Only	Always Legal & Fiscal Rule Driven	Region, Legal and AGC Only	Always Region & Legal	Fiscal Rule- Driven	Facility & Legal Only	Facility & Legal Only (prior eCER approval)	Always MC Legal	Always AGC & Corporate	Clinical Research
Other Medical Equipment												
Services Agreements – Sterilization Equipment	Sterilization Equipment – Referral Source	TCAM				X						
Services Agreements – Sterilization Equipment	Sterilization Equipment – Non-Referral Source	TCAM					X					
Settlement Agreements	Mutual Termination, Settlement, and Release of All Claims (Lease)- Non-Referral Source							Х				
Settlement Agreements	Mutual Termination, Settlement, and Release of All Claims (Lease)- Referral Source							Х				
Settlement Agreements	Release In Full (Lost item) - Non-Referral						Х					
Settlement Agreements	Release In Full (Lost item) - Referral							Х				
Settlement Agreements	Settlement Agreement (Other) - Non-Referral							Х				
Settlement Agreements	Settlement Agreement (Other) - Referral							Х				
Supplemental Staffing Agreements	Agreement for Supplemental Staffing Agencies - Referral					Х						
Supplemental Staffing Agreements	Agreement for Supplemental Staffing Agencies - Non-Referral						Х					
Transfer Agreements	Transfer Agreement - Non-Standard		Х									
Transfer Agreements	Transfer Agreement - Standard		Х									