

Exhibit A

Examples of Referral Sources

The term “referral source” for purposes of eCATS processing encompasses both those who can refer business TO Tenet Entities as well as certain types of vendors who receive referrals FROM Tenet Entities.

In general, a referral source TO a Tenet Entity is intended to mean a person (including a physician or an immediate family member of a physician) or entity (including an entity owned in whole or in part by a physician or an immediate family member of a physician) that is an actual referral source, or is reasonably expected to be a source of referrals to a Tenet Entity, or that can influence or recommend the purchasing, leasing, ordering or arranging for any goods, facility, item or service paid for, in whole or in part, by a federal healthcare program. In some cases, vendors FROM whom a Tenet Entity may purchase any good, item or service paid for in whole or in part by a federal health care program may also be considered referral sources for eCATS purposes. Examples of referral sources for eCATS purposes include, but are not limited to:

- physicians (M.D. or D.O.), a doctor of dental surgery or dental medicine, a doctor of podiatric medicine, a doctor of optometry, or a chiropractor;
- any entity or vendor owned in whole or in part by a physician who is in a position to refer patients to the Tenet Entity (use the Stark II Inquiry form to ascertain physician ownership), but excluding ownership by a physician in (1) publicly traded companies or (2) other passive investments such as pension funds, real estate mortgage investment conduits (REMICs), or other fund or investment vehicle for which investments are made by a manager on behalf of multiple investors where the individual investors do not have ability to influence the investments or activities of the company or fund;
- hospitals, SNFs, LTACs, ASCs, clinics, hospices, home health agencies, psychiatric facilities, nursing homes;
- any arrangement with an academic medical center or component of the AMC that is affiliated with or refers business to the Tenet Entity;
- ambulance companies (however, an ambulance company that provides only private transportation for which the ordering party dictates the patient’s destination may be considered a non-referral source as it does not exercise any discretion in where the patient may receive services. If, in addition to private transportation services, the ambulance company also provides other ambulance services in the market, it is considered a referral source for eCATS purposes);
- third party managers of a facility or a department of a facility such as Horizon or Rehabcare;

- professional coding, billing and/or collection agreements (not a Referral Source but characterized as a Referral Source to assure legal review due to higher levels of legal risk)
- physician extenders such as nurse practitioners, physicians assistants, CRNAs, but only to the extent that the practitioner is privileged at the hospital and licensed to independently order procedures for patients of Tenet Entities;
- physical, speech and occupational therapists and athletic trainers;
- providers of clinical-related services that may deliver a separately billable service as an independent provider at the facility or in other settings, such as dialysis providers and wound care providers;
- psychologists;
- reference labs if the lab sends specimens to the Tenet Entity for processing or if the reference lab is in a local hospital;
- any arrangement with a DME supplier, pharmaceutical manufacturer or distributor, medical device manufacturer or distributor for continuing medical education (CME) sponsorship, clinical research studies or fellowship programs. Notwithstanding the above, arrangements with any vendor whose sole connection with the Tenet Provider is selling or otherwise providing medical supplies or equipment to the Tenet Entity are not referral source arrangements;
- research sponsors (not a Referral Source but characterized as a Referral Source to assure legal review due to higher levels of legal risk)
- arrangements between Tenet hospitals and Tenet physician practices.

Examples of non-referral sources and arrangements include, but are not limited to, the following:

- security services;
- food service agreement (e.g., Morrison);
- agreements with organ procurement agencies, including eye and tissue banks;
- medical physicists and radiation physicists;
- technicians, including but not limited to, ultrasound, ECHO, radiology, polysomnographers, dosimetrists, audiologists;
- perfusionists;
- pharmacists;

- lithotripsy providers;
- OR monitoring Services/neuro-monitoring Services;
- teleradiology agreements for the sole purpose of interpreting film studies;
- respiratory therapists;
- prosthetitists and orthotists;
- psychiatric emergency response teams (PET);
- social workers;
- surgical first assistants;
- master's level counselors;
- reference labs (provided the lab entity does not refer to the Tenet Entity);
- autotransfusion services or cell savers;
- instructors (aerobics, BCLS, ACLS, weight management, aquatic, nutritionist, lactation, etc.);
- blood banks;
- housekeeping services;
- linen services;
- ground keeping, lawn care, maintenance services;
- pastoral counselors;
- in-house hospital transporters;
- agreements executed by Broadlane or other group purchasing organizations;
- outsourced valet services;
- non-ambulance transportation agreements;
- consulting agreements with non-physician owned entities or with physician owned entities where the physicians are not on the Tenet Entity's medical staff and are not expected to refer business to or generate other business for the Tenet Entity;

- arrangements with an agency or other entity that provides supplemental staffing such as RNs, PTs or other providers who would be a referral source if the hospital has an arrangement directly with the individual;
- any vendor whose sole connection with the Tenet Entity is selling or otherwise providing medical supplies or equipment to the Tenet Entity;
- infant hearing screeners;
- CME physician speakers (if not on Tenet Entity medical staff and not in Tenet Entity service area);
- law firms;
- national accounting firms;
- political campaigns;
- arrangements between Tenet hospitals.

Notwithstanding the above, if any of the above entities are owned in whole or in part by a physician who is in a position to refer patients or generate other business for the Tenet Entity, then it will be a referral source arrangement. Likewise, if any person listed above is an immediate family member of a physician, then the arrangement will be a referral source arrangement. As mentioned above, please use the Stark II Inquiry Form to ascertain whether a physician or an immediate family member of a physician is an owner in an entity or whether the vendor is an immediate family member of a physician.

There may be instances when a person or entity is considered a referral source based on the above guidance, but there is no reasonable expectation they may make a referral to your facility. For example, a physician who is licensed only in Massachusetts and who is compensated to deliver a medical staff grand rounds in Texas, is not reasonably expected to refer services to that hospital based on proximity, nor is the physician authorized by law to order hospital services in Texas. The physician will be considered a non-referral source for eCATS purposes and the basis for such determination should be evident in the Executive Summary or comments section to the eCATS package. Additionally, a Tenet hospital may need a rare laboratory test to be performed by a hospital laboratory not located in its service area or by a laboratory owned by a physician not reasonably expected to make a referral to a Tenet hospital. In these instances, the laboratory performing the test will be considered a non-referral source for eCATS, purposes and the basis for such determination should be evident in the Executive Summary or comments section to the eCATS package. For other similar instances, please contact Operations Counsel for email approval to treat the vendor as a non-referral source and upload such approval to the eCATS package.

Any of the above persons (except physicians) who are directly employed by a Tenet entity, are excluded from the eCATS process.