

Regulatory Compliance Policy	No.	COMP-RCC 5.08
Title: STANDARDS FOR SPECIMEN HANDLING CHARGES	Page:	1 of 2
	Effective Date:	06-18-15
	Previous Versions Date	ed: 06-01-11
	Corporate Review Date	ed: 07-18-19

I. SCOPE:

This policy applies to (1) Tenet Healthcare Corporation and its wholly-owned subsidiaries and affiliates (each, an "Affiliate"); (2) any other entity or organization in which Tenet Healthcare Corporation or an Affiliate owns a direct or indirect equity interest greater than 50%; and (3) any hospital or healthcare facility in which or an Affiliate either manages or controls the day-to-day operations of the entities (each, a "Tenet Entity") (collectively, "Tenet").

II. PURPOSE:

The purpose of this policy is to standardize the charge protocol for specimen handling in all Tenet Entities providing separately billable clinical laboratory services.

III. POLICY:

Specimen handling fees or charges for sending specimens from a Tenet Entities to an external, third-party laboratory must be charged on a per requisition basis by the Tenet Entities. Specimen handling fees must not be charged on per a test, per draw or per shift basis. Specimen handling does not include routine venipuncture, finger, heel or ear sticks or catheterization for urine collections.

IV. PROCEDURE:

A. Tenet Entity Implementation

Each Tenet Entity must establish individual charge codes for specimen handling fees and standards for when specimen handling charges may be applied. Specimen handling fees must not be automatically linked to any other charges.

B. Auditing and Monitoring

Audit Services will audit adherence to this policy.

C. Responsible Person

The Laboratory Director is responsible for ensuring that all individuals adhere to the requirements of this policy that these procedures are implemented and followed at the Tenet Entity, and that instances of noncompliance are reported to the Compliance Officer.

D. 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

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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.