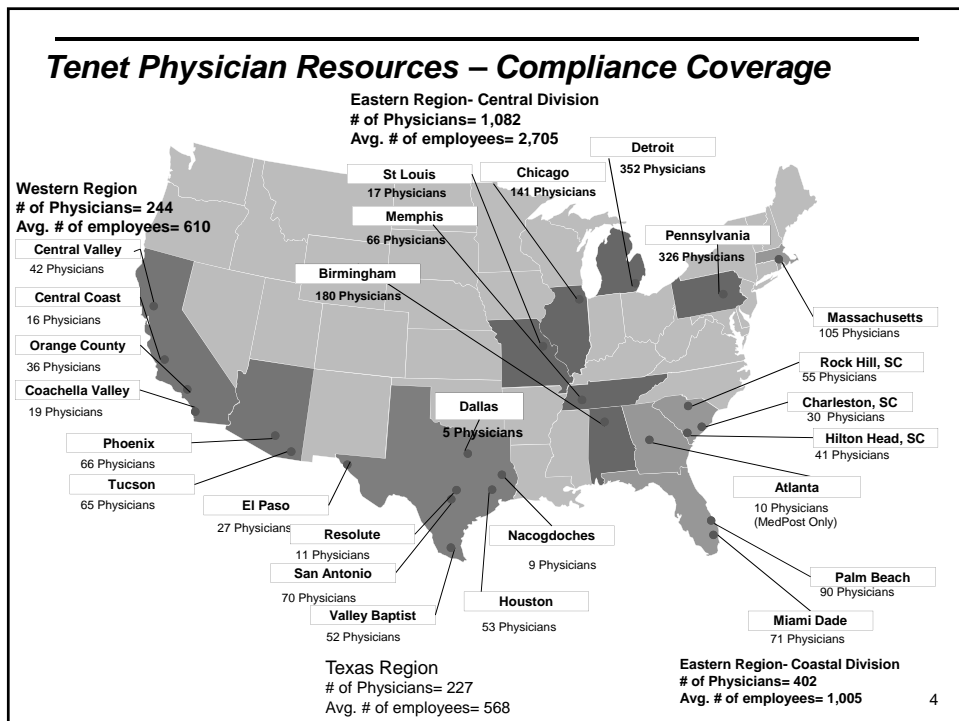





Locations



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






## Topics and Takeaways


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



## How to Communicate Across Practices


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



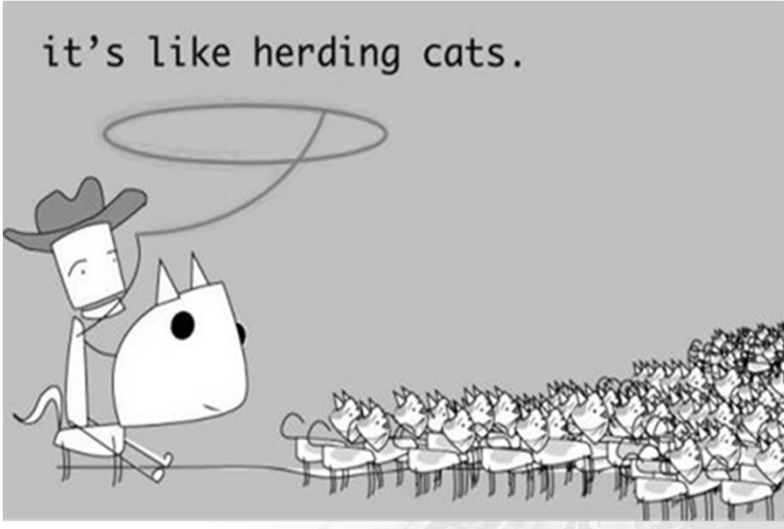


## How to Communicate Across Practices


- 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



## Training





it's like herding cats.



## Training – It's All About the Buy-in

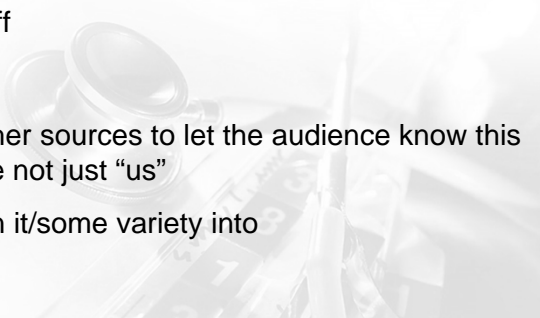
- Three major ways to accomplish:
  - ☐ Live
  - ☐ Computer course with test
  - ☐ Video





## Training – It's All About the Buy-in

### 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






## Training Topics for Practices


- 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/s0inbpEjcTI>





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## Initiatives Impacting Physician Practices


- 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?

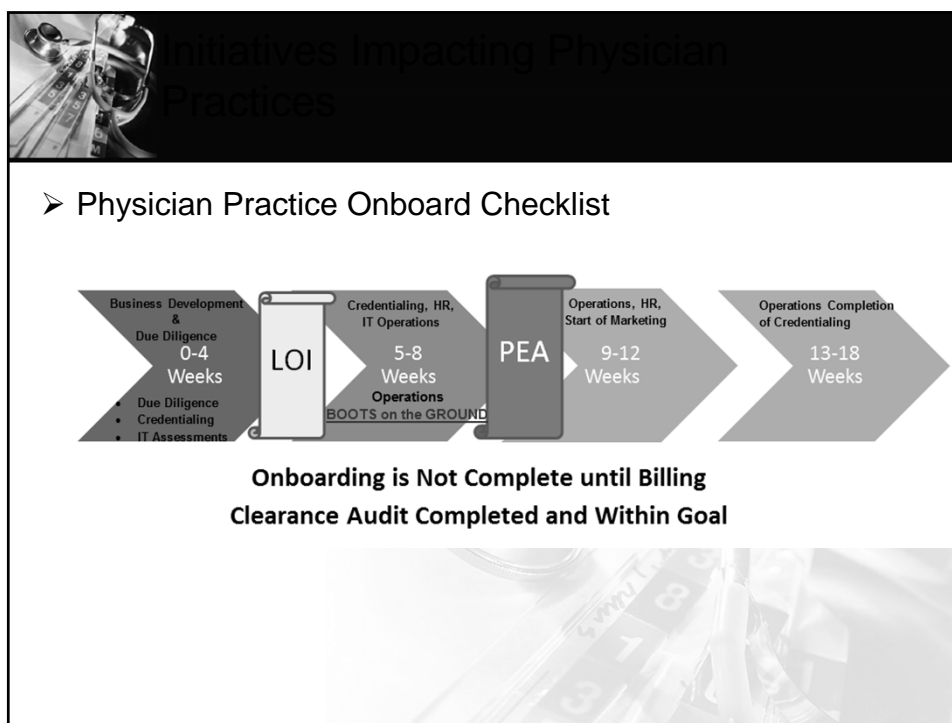


## Initiatives Impacting Physician Practices

### 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”





**Initiatives Impacting Physician Practices**


**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







## Initiatives Impacting Physician Practices

### 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

## Initiatives Impacting Physician Practices

|     |   |                          |                |
|-----|---|--------------------------|----------------|
| TPR | Tenet Physician Resources Policies and Procedures | No.:                     | TPR.QMC.107.00 |
|     | Title:  | Page:                    | 1 of 2         |
|     |   | Effective Date:          | 07-16-12       |
|     |   | Retire Policy Dated:     |                |
|     |   | Previous Versions Dated: |                |

**ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS**

**I. SCOPE:**  
This policy applies to all physician practices owned or operated by Tenet Healthcare Corporation's consolidated subsidiaries (each, a "Tenet Physician Practice").

**II. PURPOSE:**  
The purpose of this policy is to ensure that the Physician Practice adheres to prudent, accepted standards of practice for the specialty(ies) of the providers in the Physician Practice. Further, it sets the expectation that in providing professional and ancillary services, the Physician Practice abides by federal and state law related to providing care to federally funded beneficiaries.

**III. DEFINITIONS:**  
"Alternative Line of Business" means any item and/or products that may not fit into traditional lines of service for the primary or specialty care practice, and that are included but not limited to the list of services detailed in the Job Aid to this Policy.

**IV. POLICY:**  
The Physician Practice must obtain the approval of the Vice President Physician Practice Management or designee for new or alternative lines of business in order to properly assess the risks and put proper processes in place. Approval must be obtained before proceeding with any expenditure of resources.

**V. PROCEDURE:**

**A. Job Aid**  
The Physician Practice will follow the procedural steps required to obtain prior approval for new or 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 Person**  
The Physician Practice Manager or designee is responsible for ensuring that all individuals adhere to the requirements of this policy. If the Practice Manager or designee identifies non-adherence to this policy, the Practice Manager or designee will immediately report the non-adherence to this policy to the Market Operations Director or designee.

|     |   |                          |                |
|-----|---|--------------------------|----------------|
| TPR | Tenet Physician Resources Policies and Procedures | No.:                     | TPR.QMC.107.00 |
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|     |   | Effective Date:          | 07-16-15       |
|     |   | Retire Policy Dated:     |                |
|     |   | Previous Versions Dated: |                |

**ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS**

**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 any listed in the Job Aid of this policy have been approved. Physician Coding and Quality Management will monitor the provision of service by specialty as part of routine quality review audits 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.


**E. 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 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.

**VI. REFERENCES:**

**Related Policies**

**Job Aid**

JA.TPR.QMC.107.00 Alternative Lines of Business Job Aid



## Initiatives Impacting Physician

|            |   |                                |                          |
|------------|---|--------------------------------|--------------------------|
| <b>TPR</b> | <b>Tenet Physician Resources Policy Job Aid</b>             | <b>No.:</b>                    | <b>JA.TPR.QMC.107.00</b> |
|            | <b>Title:</b>   | <b>Page:</b>                   | <b>1 of 4</b>            |
|            | <b>NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS</b> | <b>Effective Date:</b>         | <b>07-16-15</b>          |
|            |   | <b>Retires Job Aid Dated:</b>  |                          |
|            |   | <b>Previous Version Dated:</b> |                          |

**I. POLICY DEFINITIONS:**

"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, and that are included but not limited to the list of service detailed in the Job Aid to this Policy.

**II. PROCEDURE:**


**A. Approval Process**

- Physician Practice Operations will establish and maintain a Procedure Review Committee (PRC) under the direction of the Senior Director-Physician Operations or designee, and composed of representatives from Divisions such as Operations, Coding Compliance, Physician Practice Compliance, Regulatory Legal, Clinical Quality, and as necessary, Primary Care and Specialty Care Physicians. Other Tenet Divisions may be included or consulted as necessary including Risk Management, Safety, or others with knowledge of or subject matter expertise in the service(s) being reviewed.
- A Physician Practice wishing to add a new and alternative service will complete the New/Alternative Lines of Business Form (hereafter, the "Form") 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 and/or 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.
  - New Practices:** The Transition or Onboarding Representative or designee for the Market will work with the Physician Practice and Physician to complete and submit the Form to the MOD or designee within sixty (60) days of opening the practice.
  - Pending Acquisitions:** The Business Development and Transition or Onboarding Representatives 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 Finance for the Market. For an existing service, review and response will occur within two weeks of receipt of completed documentation.
  - Existing Practice:** The MOD or designee of an existing Physician Practice will need to submit the approved Form by the 10<sup>th</sup> of the month. A decision will be made within sixty (60) days of the Committee meeting following submission of the Form.

**B. Services identified as Alternate Lines of Business**

This policy includes but is not limited to the following services:

- Cash-based services including Screenings
- Services not routine for the physician specialty
- Diagnostic imaging including x-ray, ultrasound, CT, MRI, mammography
- Experimental or pending FDA-approval services
- Category III code services
- Cosmetic procedures and services
- Rehabilitative Therapies
- Audiologic Services and Supplies
- In-house Pharmacy or Dispensary
- Compounding of medications
- Oncology infusion
- Supplements
- Weight management (non-traditional)
- Non-traditional lines such as dietician, massage therapist, aesthetician, trainer, acupuncturists, chiropractic, etc.



## Initiatives Impacting Physician

|            |   |                                 |                          |
|------------|---|---------------------------------|--------------------------|
| <b>TPR</b> | <b>Tenet Physician Resources Policy Job Aid</b>             | <b>No.:</b>                     | <b>JA.TPR.QMC.107.00</b> |
|            | <b>Title:</b>   | <b>Page:</b>                    | <b>3 of 4</b>            |
|            | <b>NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS</b> | <b>Effective Date:</b>          | <b>07-16-15</b>          |
|            |   | <b>Retires Job Aid Dated:</b>   |                          |
|            |   | <b>Previous Versions Dated:</b> |                          |

- In-office procedures requiring sedation or other procedures typically performed in a hospital or ambulatory surgery setting
- Allergen Immunotherapy that includes practice provision of allergenic extract
- Moderate and High Complexity Laboratory testing
- Clinical research studies (obtain PRC approval before submitting to Tenet Clinical Research Director)
- Neurological Testing (exception: Neurologists) including: Electromyogram (EMG), Nerve Conduction Studies (NCS), Electroencephalogram (EEG) and Intra-Operative Monitoring
- Sleep Studies (exception: pulmonology or board certified sleep specialists)
- Cardiology Testing (excluding EKG; exception: cardiology, cardiology sub-specialty)
- Vascular Studies (excluding cardiology, vascular)
- Pain Management
- Durable Medical Equipment dispensed by the Physician Practice
- 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, staffed, coded/billed for, supervised, or other question, the service should be evaluated utilizing the process detailed in this Job Aid.

**III. MEASUREMENTS:**

Existence 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.FIN.102.00 Pro Forma Development, Letter of Intent and Renewals (pending)

|            |   |                                 |                          |
|------------|---|---------------------------------|--------------------------|
| <b>TPR</b> | <b>Tenet Physician Resources Policy Job Aid</b>             | <b>No.:</b>                     | <b>JA.TPR.QMC.107.00</b> |
|            | <b>Title:</b>   | <b>Page:</b>                    | <b>4 of 4</b>            |
|            | <b>NEW AND ALTERNATIVE LINES OF BUSINESS REVIEW PROCESS</b> | <b>Effective Date:</b>          | <b>07-16-15</b>          |
|            |   | <b>Retires Job Aid Dated:</b>   |                          |
|            |   | <b>Previous Versions Dated:</b> |                          |

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

