	Corporate Security Policy & Procedure	No. CS -1.01
	Title: HANDLING AND DISPOSING OF ILLEGAL SUBSTANCES	Page: 1 of 3
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		Retires Policy Dated: 07-01-11
		Previous Versions Dated: 03-28-05

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 Tenet Healthcare Corporation or an Affiliate either manages or controls the day-to-day operations of the facility (each, a “Tenet Facility”) (collectively, “Tenet”).

II. PURPOSE:

The purpose of this policy is to establish guidelines for the documenting, handling and disposing of illegal substances or drug paraphernalia. For purposes of this policy, an illegal substance is defined as any illegally possessed controlled substance, drug (*e.g.*, marijuana, cocaine, heroin, etc.), drug paraphernalia or unprescribed drugs for which prescriptions are required.

III. POLICY:


Tenet prohibits the presence of illegal substances and drug paraphernalia on hospital or other Tenet premises and require that such illegal substances be handled and disposed of in a safe manner and in a way that is consistent with state and federal laws and regulations.

IV. PROCEDURE:

A. Hospital Implementation

1. Handling

An employee who takes into his/her possession any suspected illegal drug, or drug paraphernalia, should immediately notify the house supervisor/Administration. The house supervisor, or Administration, shall take control of the suspect item and be responsible for its safe storage until the item can be properly disposed of. All suspect items must be placed in a plastic container, or bag, which is capable of preventing spills and eliminates direct contact with the suspect item and its packaging. The suspect item should be placed in a locked drawer or file cabinet (DO NOT store inside hospital narcotic cabinets). Handling of a suspect item should be minimized. A suspect item should not be passed between employees in an attempt to identify it and under no circumstances should an employee touch, smell or taste the substance.

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2. Investigation

The use of illegal substances by patients presents a significant threat to the patients' welfare and places the Tenet Facility in a position that may result in potential liability. Therefore, the initial investigation should focus on attempting to identify the person responsible for bringing the suspect item into the Tenet Facility and whether or not a patient used or had access to the item. If the investigation reveals that a patient was in possession of the item, the patient's physician should be notified as soon as possible. If it is determined that the suspect item was brought into the Tenet Facility by an employee, the supervisor shall refer to Human Resources Policy HR.EHP.18 Drug-Free Workplace and Drug Testing. If ownership cannot be established, the supervisor should arrange for the disposal of the suspect item. The supervisor shall complete an event report in eSRM. The event report shall include a description of the substance and the manner in which it was disposed.

3. Disposal

The proper disposal of illegal substances/drugs is imperative in protecting the patient, the Tenet Facility and the employee having custody of the substance. Regardless of whether or not ownership can be established, all illegal substances should be turned over to the local law enforcement agency for disposal. This protects the Tenet Facility and the employee by establishing a documented chain-of-custody and proof that the substance was disposed of in a legitimate manner. The supervisor shall request that the agency conduct a drug analysis of the substance.


In the event the law enforcement agency refuses to take possession of the substance, the supervisor shall obtain the name of the officer and agency contacted and secure the item until Tenet's Corporate Security Department can be contacted for advice.

B. Corporate Implementation

If an illegal substance was brought into the facility by an employee, the supervisor shall refer to Human Resources Policy HR.EHP.18 Drug-Free Workplace and Drug Testing.

C. Auditing and Monitoring

Audit Services shall audit adherence to this policy in its routine facility audits.

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D. Responsible Person

The Tenet Facility Security Manager is responsible for ensuring that all individuals adhere to the requirements of this policy. If the Security Manager is unable to create adherence to this policy, the Security Manager shall immediately report the non-adherence to this policy to Administration

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.

V. REFERENCES:

- Human Resources Policy HR.EHP.18 Drug-Free Workplace and Drug Testing