

RESPONSIBLE DEPARTMENT: Corporate Compliance	SUBJECT: EXCLUDED PROVIDERS AND EMPLOYEE/VENDOR SCREENING
NUMBER OF PAGES: 5	REPLACES POLICY: 01/2024
EFFECTIVE DATE: APRIL 2024	POLICY ID. ADM-CC

SCOPE:

This policy applies to all employees at Community Memorial Hospital (CMH), Family Health Centers (FHC), and Specialty Clinics.

PURPOSE:

The purpose of this policy is to ensure that the hospital remains in compliance with applicable laws and regulations and provides safe and quality care to its patients.

POLICY STATEMENT:

It is the policy of Community Memorial Hospital to not hire, employ or enter into any business arrangement with any entity or person who is excluded from participating in any government healthcare benefits program, including without limitation, Medicare or Medicaid. This is to ensure that the hospital remains in compliance with applicable laws and regulations and provides safe and quality care to its patients. The hospital screens all applicants and employees, candidates for, and current Members of, the Medical Staff, contractors, agents, subcontractors, independent contractors and vendors for exclusion from government health care programs and monitors the exclusion lists on an ongoing basis.

An “Excluded Provider” is anyone who appears on the screening database lists (See Procedure: Section B). The Office of Inspector General’s permissive authority has been expanded to exclude providers that: obstruct audits, make false statements or misrepresentations of material facts in certain agreements and documents, including during enrollment, regardless of whether the statements influenced a government payment decision, or fail to provide certain payment information even if the provider did not submit a claim but requested payment. There is a 10-year statute of limitations for exclusion actions.

PROCEDURE:

- A. General Requirement – The hospital (through Human Resources, Purchasing, the Medical Staff Office, the Compliance Office, the Business Office or other departments) shall screen individuals and companies with whom the hospital has business relationships and/or employment relationships. Screenings shall be conducted prior to the start of the business/employment relationship and periodically thereafter as determined necessary by the Compliance Officer (“CO”), or his/her designee, and in accordance with applicable federal and state guidelines. Exclusion screening results will be promptly shared with the compliance officer and appropriate compliance personnel.
- B. Various Screening Data Bases – The CO, or his/her designee, shall ensure that the following databases are queried at least every thirty (30) days:
 - 1. United States Department of Health and Human Services, Office of Inspector General (OIG) website – List of Excluded Individuals/Entities (LEIE) – This database provides information regarding individuals and entities currently excluded from participation in Medicare, Medicaid and all Federal healthcare programs. **All employees are checked upon initial hire by HR and**

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monthly by administration secretary. All Providers are checked on initial appointment and at reappointment by administration secretary.

2. New York State Office of the Medicaid Inspector General (OMIG) website – OMIG’s website provides access to the list of individuals or entities whose participation in the Medicaid program has been restricted, terminated or excluded. **All employees are checked upon initial hire by HR and monthly by Administration Secretary. All Providers are checked on initial appointment and at reappointment by administration secretary.**
3. New York State Department of health, Office of Professional Medical Conduct and Physician Discipline (OPMC) website – Verification of practitioners who have been disciplined by OPMC. **All Providers are checked on initial appointment and at reappointment by administration secretary. Providers are also checked a month prior to license expiring.**
4. National Practitioner Data Bank and the Healthcare Integrity and Protection Data Bank – Flagging systems intended to facilitate a comprehensive review of healthcare practitioners’ professional credentials or past actions. **All Providers are checked on initial appointment and at reappointment by administration secretary.**
5. System for Award Management (SAM) website – *replaced the Excluded Parties List System (EPLS) in August 2012.* Verification of practitioners excluded from receiving federal contracts, certain subcontracts and certain federal financial and non-financial assistance and benefits. **All employees are checked upon initial hire by HR and monthly by Administration Secretary. All providers are checked on initial appointment and at reappointment by administration secretary.**
6. New York State Education Department's Office of the Professions (OP) website - Verification of Licensure and registration status of one of the 49 professions by name or License number. You can also search on that site for disciplinary actions taken by the Board of Regents, by the name of the licensee or professional business entity/pharmacy establishment, or by the date of action. **This screen is completed prior to hire by Human Resources and yearly.by Manager or Nursing Administration.**
7. American Medical Association (AMA) website - AMA DoctorFinder provides Comprehensive information on individual physicians from which you can select a physician or verify the credentials of a known Physician. AMA DoctorFinder includes more than 814,000 AMA member and non-member doctors of medicine (MD) and doctors of osteopathy or osteopathic medicine (DO). **All providers are checked on initial appointment and at reappointment by Credentialing Coordinator.**

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8. Nurse Aide Registry - Verify certification of a new CNA. **This screen is completed prior to hire by Human Resources**
9. Family Watchdog website - A service to help locate registered sex offenders in your area. Completed by HR for all new employees at time of hire. **This screen is completed prior to hire by Human Resources**
10. NYS Sex offender registry - HR will get confirmation from this agency if a person that we are considering to hire is on the registry. **This screen is completed prior to hire by Human Resources.**
11. Pre-Employment Drug Test - All offers of employment are made contingent upon the applicant passing a pre-employment drug test. See Drug Free Workplace policy.

Purchasing Department Verification

1. Individual sales representatives are the responsibility of the companies they are employed by. Upon Community Memorial Hospital's request, these companies will be required to provide verification that exclusion checks of their sales reps are performed.
 2. All new companies to Community Memorial Hospital are checked against the above-mentioned websites prior to doing business with the organization.
- C. **Ongoing Obligation to Report** – All Members of the Medical Staff are required to disclose if they become Excluded Providers subsequent to appointment/reappointment. All current employees, independent contractors and vendors of the Hospital have an obligation to notify the Compliance Coordinator immediately upon receipt of any information indicating that they have been charged with a crime relating to health care or are facing debarment, exclusion or other ineligibility from participation in any state or federal healthcare program. Failure to notify the Compliance Coordinator may result in disciplinary action.
- D. **Notification to Compliance Officer** – If it is determined that an individual or company is listed as excluded or disqualified, the department conducting the query shall immediately notify the Compliance Officer. The Compliance Officer, or his/her designee shall ensure that appropriate action is taken immediately to ensure the excluded or disqualified individual/company no longer conducts business with the Hospital, including but not limited to the ordering, furnishing or prescribing of medical care or treatments for Hospital patients. Community Memorial Hospital shall give the individual the opportunity to further identify themselves in order to verify that the name on the list is in fact that person.

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DOCUMENTATION: Applies to Caravan Health-supported ACOs, their ACO participants, providers/suppliers, and other entities providing ACO services.


DEFINITIONS: NOT APPLICABLE

REFERENCES:

1. US Department of Health and Human Services, Office of Inspector General, LEIE Website: http://oig.hhs.gov/fraud/exclusions/exclusions_list.asp
2. New York State Office of Medicaid Inspector General; Restricted, Terminated or Excluded Individuals or Entities Website: <http://www.omig.ny.gov/data/content/view/72/52/>
3. New York State Department of Health, Links to the OPMC and Physician Profile Websites: <http://www.health.state.ny.us/professionals/doctors/conduct/>
4. National Practitioner Data Bank and Healthcare Integrity and Protection Data Bank: <http://www.npdb-hipdb.hrsa.gov/>
5. System for Award Management (SAM): <https://www.sam.gov/portal/SAM/?portal>
6. New York State Education Department's Office of the Professions (OP): www.op.nysed.gov
7. American Medical Association (AMA): <https://fsso.ama-assn.org/login/account/login>
8. Nurse Aide Registry: <https://registry.prometric.com/>
9. Family Watchdog: <http://www.familywatchdog.us/>

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Approved by:



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