Policy AD510

Subject	AD510 - Program Exclusions		
Category / Section	Administration / Corporate Compliance		
Owner	Director of Corporate Compliance		
Stakeholder/ Reviewer(s)	Chief Risk & Corporate Integrity Officer; Vice President of Human Resources; Manager of Medical Staff Services; Research Integrity Officer		
Effective Date	02/04	**Review Frequency**	3 Years
Approval Date	02/23/2021		

Scope of Policy/Procedure ***(applies to entities/locations marked below)***

	This document applies to **all** entities/locations listed below

	Hospitals		**Ambulatory/Off-Campus locations**		**Other Carle Entities**
	All Carle Hospitals listed below:		All Carle ambulatory/off-campus locations listed below:	X	All other Carle entities listed below:
X	Urbana (CFH)	X	CFH/CPG ambulatory locations *(also includes Home Health, Therapy Services, Medical Supply, Danville Surgicenter, Specialty Pharmacy)*		Arrow Ambulance, LLC
X	Carle Hoopeston Regional Health Center (CHRHC)	X	CHRHC ambulatory locations *(includes, CARMC, Cissna Park, Danv-Fairchild, Mattoon-Hurst, Milford, Rossville, Tuscola, Watseka)*		Carle Retirement Centers *(Windsor of Savoy & Windsor Court)*
X	Carle Richland Memorial Hospital (CRMH)	X	Champaign SurgiCenter, LLC		Health Alliance Medical Plans
X	Carle Eureka Hospital (CEH)	X	Administration Building locations (includes Carle at the Fields)		
X	Carle BroMenn Medical Center (CBMC)	X	Carle West Physician Group (CWPG)		
		X	CRMH Ambulatory locations (includes Bridgeport, Newton, West Salem, Olney, Specialty Services)		
	Scope Exclusions *(Mark this box and enter any departments or locations within a marked entity that are exempt from the policy/procedure.)*				

Attachments N/A

Purpose

A. To establish procedures for ensuring that Carle Health, its affiliates and subsidiaries, (collectively "Carle"), are compliant with the Office of Inspector General's (OIG's) and System for Award Management's (SAM) program exclusions with respect to employees, vendors, contractors, board members, providers, and volunteers.

Definitions

A. **OIG List of Excluded Individuals/Entities (LEIE)**- provides information to the health care industry, patients and the public regarding individuals and entities currently excluded from participation in Medicare, Medicaid and all other Federal health care programs.

B. **System for Award Management (SAM) Excluded Parties List System (EPLS)** – a federal procurement database for the government, which contains information on exclusions/ineligibilities/debarments from doing business with federal government agencies and/or program.

Statement of Policy

A. Carle shall perform initial, annual and/or on-going exclusion reviews to ensure all employees, board members, privileged physicians, advanced practice providers, volunteers, referring providers, vendors, contractors, and other individuals and entities are eligible to participate in federal health care programs and to prevent the hiring of any persons who are ineligible to participate in these programs.

B. An ineligible individual/entity is defined as anyone who:

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1. Is currently excluded, debarred or otherwise ineligible to participate in federal health care programs by the OIG (an individual or entity may also be excluded from participation in a non-health care related programs by the SAM and, as a result, become excluded from federal health care programs by the OIG); or,
2. Has been convicted of a criminal offense related to the provision of health care items or services but has not yet been excluded, debarred or otherwise declared ineligible.

C. Prospective employees, providers, or vendors who have been reinstated into the Medicare and Medicaid programs by the OIG may be considered for employment, medical privileges or a business relationship with proof of reinstatement and a determination that there are no other findings that makes them ineligible.

Procedure

A. To prevent appointing, hiring, or contracting with any ineligible individual, Human Resources (HR) shall screen all prospective employees and contracted employees per HR400 - Criminal Background Investigations by:
   1. performing background checks, including but not limited to checking the SAM's EPLS,OIG's LEIE and the Illinois OIG Provider Sanctions list, and
   2. by requiring applicants to disclose whether they are ineligible.

B. HR will check all new governing board members against the OIG LEIE and the SAM EPLS for possible exclusions.

C. To prevent credentialing any ineligible individual, the Medical Staff Office (MSO) shall screen all new physicians and advanced practice providers, applying for Medical Staff Privileges (as in section A above) and will do so every three (3) years thereafter for as long as the provider has privileges.

D. To prevent engaging in business relationships with ineligible vendors, Purchasing or the hiring/contracting department shall screen all new contractors/vendors with which Carle intends to do business against the OIG LEIE and the SAM EPLS.

E. In addition to a comprehensive annual review, the Office of Corporate Compliance will conduct routine checks against the monthly updates of the OIG, SAM, and Illinois OIG Provider Sanction lists to determine if Carle is engaging in business relationships with employees, contractors, medical and clinical staff members, who have been excluded, debarred, or otherwise ineligible for participation in any federal health care program. In no circumstances, will such routine checks be conducted less than annually as recommended by the OIG in its *Supplemental Compliance Program Guidance for Hospitals*, published on January 31, 2005.

F. If an individual or entity appears on one of the exclusion lists, Compliance will be notified and will verify the exclusion. If the exclusion is verified, Compliance will notify the VP, Chief Risk & Corporate Integrity Officer and the relevant department(s) for further action.

Other Related Links

AD107- Contract and Agreement Creation, Review and Approval
HR400 - Criminal Background Investigations
MS542 - Appointment/Reappointment to Medical Staff and/or Granting and/or Renewing of Clinical Privileges
Federal Exclusion database: https://exclusions.oig.hhs.gov/
Federal Exclusion database: https://sam.gov/SAM/
Illinois Provider Sanctions: https://www.illinois.gov/hfs/oig/Pages/SanctionsList.aspx

References

- OIG Supplemental Compliance Program Guidance for Hospitals, January 31, 2005
- OIG Updated Special Advisory Bulletin on the Effect of Exclusion from Participation in Federal health Care Programs, Issued May 8, 2013

Electronic Approval on File

Laurence J. Fallon
Executive Vice President and Chief Legal Officer

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