

THE CENTER FOR DISCOVERY

SUBJECT: Employee and Contractor Exclusion Screening	MANUAL: Corporate Compliance
	SECTION: Section 5

Purpose:

The Center for Discovery is committed to maintaining high quality care and service as well as integrity in its financial and business operations. Therefore, The Center for Discovery will conduct appropriate screening of key providers, employees, independent contractors, and business vendors to preclude employing or engaging in business relationships with individuals and entities that have been convicted of criminal violations or have been the subject of sanctioning, debarment, exclusion, or other adverse action that could have an impact on their compliance with applicable laws and regulations.

Policy:

1. It is the policy of The Center for Discovery not to employ, contract with, or conduct business with an individual or entity excluded from participation in federally sponsored health care programs, such as Medicare and Medicaid, or who have otherwise been the subject of sanctioning, debarment, exclusion, or other adverse action that could have an impact on their compliance with applicable laws and regulations.
2. The Center for Discovery will conduct exclusion (sanction) screening of all current and proposed employees and independent contractors.
3. The Center for Discovery will verify that entities and businesses that provide and/or perform services for the Center have not been the subject of adverse governmental actions and/or excluded from the federal healthcare programs.
4. The Corporate Compliance Officer (CCO) is responsible for monitoring this policy for compliance and reporting results annually to the Corporate Compliance Committee and the QI/ Corporate Compliance Committee of the Board of Directors.

Procedures:

1. The Center for Discovery will conduct exclusion checks to verify that all employees and independent contractors have not been excluded from federal healthcare programs. An exclusion check is a search of the following to determine if the individual or entity's name appears on either list:
 - U. S. Department of Health and Human Services, Office of Inspector General (OIG)'s List of Excluded Individuals and Entities (LEIE) available on the website at <http://exclusions.oig.hhs.gov> and
 - The System for Award management website at <https://www.sam.gov/>
 - New York State Department of Health Excluded Providers List at http://www.health.state.ny.us/health_care/medicaid/fraud/dqprvpg.htm

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2. An exclusion check will be performed on all applicants for employment as part of the pre-employment screening process. The employment application for all new employees will include appropriate questions under current law related to conviction of a crime or sanctioned by a duly authorized regulatory or enforcement agency of government.
3. The Human Resources, Finance, Legal or Program Administrator who is responsible for making arrangements with independent contractors shall be responsible for conducting exclusion checks prior to entering an agreement with an independent contractor.
4. The Human Resources Department is responsible for carrying out this policy as it relates to hiring of employees.
5. The Credentialing Committee of the Discovery Health Center is responsible for carrying out this policy in granting staff privileges to medical personnel.
6. Contracts with business vendors will contain a certification that the vendor and its employees are not excluded by the federal government. The Chief Financial Officer shall assure that an exclusion check of the business entity is conducted prior to entering a business contract with the vendor. The Corporate Compliance Officer in conjunction with the Office of People Operations will assure that exclusion checks of all employees and independent contractors are conducted monthly.
7. If the exclusion check indicates that any individual or entity has been excluded from federal healthcare programs, the individual or entity cannot be employed by or conduct business with The Center for Discovery.
8. In addition to exclusion screening, the credentials of medical/healthcare professionals employed by the Center for Discovery or with whom they establish a contractual business relationship will be verified with appropriate licensing and disciplining authorities, including any adverse actions taken against the individuals that might impair his or her performance of duties, or fiduciary responsibilities on behalf of the Center. The process will include, but not be limited to, physicians and other health care practitioners for which the license is required for the performance of their duties. The screening and verification will be conducted as part of the hiring process or prior to entering a contractual agreement and at least annually thereafter.
9. The Office of People Operations will maintain the results of all exclusion checks.

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