

UC Riverside, School of Medicine Policies and Procedures

Policy Title: UCR SOM OIG/GSA Exclusion Review

Policy Number: SOM 5.0

Responsible Officer:	Vice Chancellor, Health Affairs & Dean, School of Medicine
Responsible Office:	Vice Chancellor & Dean's Office
Origination Date:	May 1, 2013
Date of Revision:	August 03, 2015
Scope:	The purpose of this policy is to set forth the procedures UCR Health follows in determining whether potential or current UCR Health employees and/or contractors are excluded from participation in federal healthcare programs.

I. Policy Summary

Federal law prohibits entities that participate in federal health care programs (including Medicare, Medicaid, and other governmental programs), such as UCR Health, from entering into or maintaining certain relationships with individuals or entities that have been excluded from participation in federal health care programs. The Medicare statute also excludes from coverage any item or service that has been ordered, supervised, or furnished by an individual or an entity during any time when the individual or entity has been excluded from the federal program.

II. Definitions

Office of Inspector General (OIG)
U.S. General Services Administration (GSA)
42 U.S. Code section 1320a-7(a)(1)(D), (a)(4)(c), 1320a-7(b)(8)
Health Insurance Portability and Accountability Act of 1996
Balanced Budget Act of 1997
63 Fed. Reg. 46736, 46743 (September 2, 1998)
OIG Advisory Bulletin, September 28, 1999

III. Policy

A. UCR Health will perform initial, and ongoing exclusion reviews to ensure that employees (including faculty), vendors, contractors, and physicians have not been sanctioned or excluded from participating in any federal health care program as prohibited by federal law.

1. For purposes of this policy, an "ineligible individual/entity" is anyone who:
 - a. Is currently excluded, debarred, or otherwise ineligible to participate in the federal health care programs or in federal procurement or non-federal procurement programs; or
 - b. Has been convicted of criminal offense related to the provision of health care items or services but has not yet been excluded, debarred, or otherwise declared ineligible.

IV. Responsibilities

A. UCR SOM Compliance Officer duties

1. If UCR Health identifies an ineligible individual/entity in the Exclusions verification process, the Compliance Officer and University Legal Counsel will be contacted for advice and direction on proceeding with an appropriate course of action.

V. Procedures

A. The following screening procedures will be conducted by various UCR Health departments.

1. Human Resources Screening
 - a. Prior to the hiring of any UCR Health employee, the Human Resources Department will screen all potential employees by:
 - 1) Requiring applicants to disclose whether they are ineligible; and
 - 2) Reviewing the United States General Services Administration List of Parties Excluded from Federal Programs (“GSA Exclusion List”) and the United States Department of Health and Human Services Office of Inspector General List of Excluded Individuals/Entities (“OIG Exclusion List”), and the Medi-Cal list of Suspended and Ineligible Providers.
 - a) The Human Resources Department shall notify the Compliance Office and University Legal Counsel of any matches found during any of the above screening processes. If a potential employee is determined to be an Excluded Individual, the individual will no longer be eligible for hire.

B. At hire

1. After hire, all employees are required to complete the Code of Conduct training, and sign the “*Acknowledgement Statement*” (Exhibit A) included in the Code of Conduct Handbook to certify that the employee has not been excluded, has no knowledge of an impending exclusion, and agreement to notify the Compliance Office if they should become aware of their potential exclusion.

C. Monthly Screening

1. At UCR Health will screen all current employees on a monthly basis, to verify that all existing employees have not been excluded from federal programs since the last review.
 - a. If UCR Health identifies that a current employee is an ineligible individual in the Exclusions verification process, the Compliance Officer and University Legal Counsel will be contacted for advice and direction on proceeding with an appropriate course of action.

D. Credentials Verification Office

1. The UC Irvine Healthcare Credentials Verification Office (“CVO”) has been contracted by UCR Health to credential UCR Health practitioners and UCR Health practitioners are included in the UC Irvine Healthcare Medical Staff Services database.
 - a. Annual Screening. The UC Irvine Healthcare Credentials Verification Office (“CVO”) shall, on an annual basis, conduct a cross-reference screening of the OIG Exclusion List database with current active practitioners in the UC Irvine Healthcare Medical Staff Services database.
 - b. Monthly screening. The CVO shall, on a monthly basis, review the updated list of Excluded Individuals on the OIG Exclusion List and compare it to the current active practitioners in the Medical Staff Services database.

E. Initial Appointment/Reappointment Screening

1. The CVO shall query the OIG Exclusion List as part of its primary source verification process for each application for appointment to the medical staff in accordance with the CVO policies and procedures. Potential medical staff members will be required to, as part of the appointment/reappointment process, warrant that the applicant has not been excluded from a federal health care program.
 - a. The CVO shall notify the UCR Health Compliance Officer and UC Riverside University Legal Counsel of any matches found during any of the above screening processes.

F. Accounts Payable

1. The UCR Health Accounts Payable Office (“Accounts Payable”) shall screen all new vendors/contractors who have submitted a request for payment for services rendered to UCR Health.
 - a. The Accounts Payable Department will screen all current vendors on a monthly basis, to verify that all existing vendors and contractors have not been excluded from federal programs over the course of the year since the last review.
 - b. Accounts Payable shall notify the Compliance Officer and University Legal Counsel of any matches found during any of the above screening processes.

G. Purchasing

1. Prior to completing a contract for services, the UC Riverside Materials Management Department (“Material Management”) will screen all potential vendors and contractors. Potential contractors will be required to warrant that none of the vendor’s employees have been excluded from a federal health care program.
 - a. Materials management shall notify the Compliance Officer and University Legal Counsel of any matches found during the above

screening processes.

H. Compliance Office

1. The Compliance Office shall request annual reports from the above departments regarding their screening activities and may audit each department's files, as necessary.

VI. Forms/Instructions: (See Exhibit A for forms and refer to Procedures section for instructions)

VII. Contacts:

Division	Senior Executive	Phone
SOM Administration	Vice Chancellor & Dean	951-827-4564
Compliance Office	Compliance Officer	951-827-4672

VIII. Related Information: Not Applicable

IX. Revision History:

Create Date: May 1, 2013

UCR-SOM,

Administrative Policy Committee Review/ Approval Date:07/21/2015

Approval Date:

Approval Signature(s)

G. Richard Olds, MD
Vice Chancellor, Health Affairs
Dean, School of Medicine

Paul H. Hackman
Compliance and Privacy Officer
School of Medicine

Exhibit A

**Acknowledgement Statement
UC Riverside School of Medicine Code of Conduct**

My signature on this form acknowledges that I have received the UCR Health Code of Conduct and agree to read and abide by the UCR Health Code of Conduct.

I confirm that I have not been excluded by the federal government from participation in any governmental healthcare program nor, to the best of my knowledge, have I been proposed for exclusion. I agree to notify the Compliance Officer or the University Legal Counsel immediately upon my receiving written or verbal notification that I am proposed for exclusion from any governmental healthcare program.

Name (please print) _____

Signature _____

Date _____

Department _____