

# **Policy and Procedure: Corporate Compliance**

## **Topic: Employee and Contractor Exclusion Screening**

### **Purpose:**

OCO Inc. is committed to maintaining high quality care and service as well as integrity in its financial and business operations. Therefore, OCO will conduct appropriate screening of key providers, employees, independent contractors, and business vendors to ensure that they have not been sanctioned by a federal or state law enforcement, regulatory, or licensing Agency.

### **Policy:**

1. It is the policy of OCO 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.
2. OCO will conduct exclusion (sanction) screening of designated employees and independent contractors.
3. OCO will verify that entities and businesses that provide and/or perform services for the Agency have not been the subject of adverse governmental actions and/or excluded from the federal healthcare programs.

### **Procedures:**

1. OCO will conduct exclusion checks to verify that designated 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://oig.hhs.gov/fraud/exclusions.html>; and
  - The General Services Administration (GSA)'s Excluded Parties List System available on the GSA website at <http://www.epls.gov/>
2. The Human Resources Department (HR) will conduct an exclusion check on applicants recommended for hire as part of the pre-employment screening process.

BOD Approval: 10/02/2007

1

Policy Council Approval: pending

Amended: N/A

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3. The Division Director (or their designee) is responsible for the arrangements with independent contractors and responsible for conducting exclusion checks prior to entering an agreement with an independent contractor.
4. Contracts with business vendors will contain a certification that the vendor and its employees are not excluded by the federal government. The Accounting Department shall assure that an exclusion check of the business vendor is conducted prior to entering a business contract with the vendor and at least annually.
5. The HR Department will assure that exclusion checks of all employees and independent contractors are conducted at least annually.
6. 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 OCO.
7. The HR Department shall maintain the results of all exclusion checks.
8. In addition to exclusion screening, the credentials of medical/healthcare professionals employed by OCO 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 OCO. 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. An annual audit of employment applications and business vendors with which OCO enters into a business relationship will be conducted by the Internal Audit Department to verify that this policy is enforced. A report of this audit will be made to the Board of Directors, along with any recommendations for remedial actions or improvement to the process as part of the annual compliance report.

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2

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