

## Office of Inspector General (OIG)/General Services Administration (GSA) Exclusion Checks

Effective Date: 7/28/2014

Draft/Review Date: 8/18/2014

### Policy

- A. It is the policy of the ACO to ensure that Office of Inspector General (OIG)/General Services Administration (GSA) exclusion checks (hereinafter referred to as "OIG/GSA checks") are performed at the time of hire/contract execution and on a monthly basis thereafter for all Collaborative Health Systems (CHS) employees/contractors, Participants, Professionals, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities.

### Applicability

This policy and procedure applies to all Participants, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities.

### Procedure

- A. CHS performs an electronic OIG/GSA check at the time of hire/contract execution and on a monthly basis thereafter for:
  1. Participants;
  2. Professionals;
  3. Providers/Suppliers; and,
  4. CHS employees and contractors.
- B. The Participant practice performs an electronic OIG/GSA check for all individuals or entities that perform functions or services related to the ACO's activities but are not addressed by the CHS OIG/GSA checks noted above. These checks are also conducted at the time of hire/contract execution and on a monthly basis thereafter.
- C. The Participant practice educates all Professionals, Providers/Suppliers, and other individuals or entities performing functions or services related to the ACO's activities about the requirement to perform OIG/GSA checks upon hire and monthly thereafter.
- D. To access the OIG/GSA Online Searchable Database, go to: <https://oig.hhs.gov/exclusions/index.asp>.
  1. **Check by Individual Name**

Use the OIG Online Searchable Database to check up to five names at a time:

    - a. If no record appears upon submission of the name, there is no report of fraud or abuse related to that person.

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- b. If a record does appear, verify that the name by their associated Social Security Number.
- c. If there is a match, the name must be reported through the appropriate chain of command within the organization.
- d. Keep a monthly record of:
  - i. The dates that the OIG/GSA checks are performed; and,
  - ii. Evidence that the OIG/GSA checks are performed, such as a screen shot.
- E. If there is a match, the name of the individual must be reported as follows: When a positive exclusion is found, the name of the Provider or staff will be immediately provided in writing to the Compliance and Ethics Subcommittee and to the Compliance Officer. A thorough investigation will be immediately initiated by the Compliance Office and the Compliance Officer will render a final recommendation to the ACO Board of Directors.
- F. ACO Participants will attest to the Compliance & Ethics Subcommittee on at least an annual basis that the ACO has performed the required OIG/GSA checks on all Professionals, Providers/Suppliers, and other individuals or entities that perform functions or services related to the ACO's activities upon their hire/contract execution and monthly thereafter.
- G. Ad hoc OIG/GSA checks may be performed at any time there is a significant incident that warrants investigation.

### Reporting

- A. An OIG/GSA report will be sent to the Compliance & Ethics Subcommittee when issues are identified and escalation is needed.

### Related Documentation

- A. 42 CFR §425.304(b), §425.314, §425.316
- B. Office of Inspector General Exclusions Program: <https://oig.hhs.gov/exclusions/index.asp>
- C. Social Security Act §1128, §1156

### Additional Guidance

OIG checks are to be conducted as defined in the Participant Agreement.