

Department: UFJPI Administration
Policy Number: UFJPI ADM-07
Initial Approval Date: April 2006
Review Responsibility: Maryann Palmeter
Review Date: April, 2023
Revised Date: April 2020

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TITLE: Sanction and Exclusion Checks

PURPOSE:

The Department of Health and Human Service's Office of the Inspector General (OIG) issued a Special Advisory bulletin on September 28, 1999 and a *Federal Register* publication (FR Doc. 99-25427) on September 30, 1999 recommending health care providers determine whether potential and current employees and contractors are excluded from participation in federal health care programs, including Medicare and Medicaid.

The OIG also has the authority to impose civil monetary penalties against excluded individuals and entities that seek reimbursement from federal health care programs and health care providers that employ or enter into contracts with excluded individuals to provide items or services to federal program beneficiaries.

The Florida Agency for Health Care Administration (AHCA) also provides a website for performing sanctioned and terminated provider checks. This database must be checked as well.

Users must check for "Final Orders" for Medicaid Sanctioned Providers.

[http://apps.ahca.myflorida.com/dm_web/\(S\(hmwp35iqx3hqe2pnyxwr0b1g\)\)/default.aspx](http://apps.ahca.myflorida.com/dm_web/(S(hmwp35iqx3hqe2pnyxwr0b1g))/default.aspx)

Georgia Medicaid's exclusion list must be checked for any provider who will be billing charges to Georgia Medicaid. This database must be checked as well.

<https://dch.georgia.gov/georgia-oig-exclusions-list>

The Health Science Center does not knowingly hire any individual (with or without pay), enter into a contract with an individual or entity, or purchase from vendors that are listed by a federal or state agency as excluded, suspended, or otherwise ineligible for participation in federal programs. Nor does the Health Science Center allow an individual to hold any position or render any services for which the individual's or entity's compensation for the services rendered by the individual or entity are paid in whole or in part, directly or indirectly, by a federal health care program or otherwise with federal funds.

DEFINITIONS:

An ineligible individual/entity is defined as anyone who:

- Is currently excluded, debarred or otherwise ineligible to participate in the federal or state health care programs or in federal or state procurement or non-procurement programs;

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- 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.

All departments responsible for checking the federal and state sanctions and exclusions databases shall maintain documentation to support individual searches and results.

PROCEDURE:

1. UF Health - Jacksonville Medical Staff Office

To prevent credentialing of any ineligible individual, UF Health – Jacksonville’s Medical Staff Office, in the performance of routine credentialing, shall screen any physician whose salary is to be paid in whole or in part, directly or indirectly, by the Federal health care programs or otherwise with Federal funds. (*Refer to UF Health Jacksonville Policy # MS-08-015, Medical Staff Appointment – Credentials Verification*).

To prevent engaging in business relationships with any ineligible individual/entity:

2. UFJPI Accounts Payable and Finance

Accounts Payable shall screen any new vendor who has submitted request for payment for services rendered to (Organization Name), and is to be paid in whole or in part, directly or indirectly, by the Federal health care programs or otherwise with Federal funds. (*Refer to UFJHI Finance and Accounting Policy #1, Excluded Parties*).

On a monthly basis, a list of new vendors will be sent to the UFJPI VP of Finance. The UFJPI VP of Finance will ensure that any new vendors are added to the monthly file sent to the sanctions/exclusions check vendor (e.g., John Sterling).

3. UFJPI Contract Services

Prior to contract approval, Contract Services shall screen any new contractor seeking a business relationship with the organization (including all contract physicians) whose contract fee is to be paid in whole or in part, directly or indirectly, by the Federal health care programs or otherwise with Federal funds. (*Refer to UFJHI Policy # CS-013, Excluded Parties*).

On a monthly basis, a list of new parties to contracts will be sent to the UFJPI VP of Finance. The UFJPI VP of Finance will ensure that any new parties to contracts are added to the monthly file sent to the sanctions/exclusions check vendor (e.g., John Sterling).

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4. UFJPI Human Resources

- To prevent hiring of any ineligible individual, Human Resources shall screen any employee whose salary is to be paid in whole or in part, directly or indirectly, by the Federal health care programs or otherwise with Federal funds, prior to engaging their services by requiring applicants to disclose whether they are ineligible and reviewing the following lists:
- HHS Office of the Inspector General (OIG) Exclusions Program Searchable Database <https://exclusions.oig.hhs.gov/>
- System for Award Management (SAM) website <https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf>
- Florida Medicaid Exclusions List website [http://apps.ahca.myflorida.com/dm_web/\(S\(hmwp35igx3hqe2pnyxwr0b1g\)\)/default.aspx](http://apps.ahca.myflorida.com/dm_web/(S(hmwp35igx3hqe2pnyxwr0b1g))/default.aspx)
- Georgia Medicaid Exclusions List website <https://dch.georgia.gov/georgia-oig-exclusions-list>

(Refer to UFJHR-109, Criminal History Checks).

On a monthly basis, the Director Human Resources (or designee) shall send a list of new UFJPI employees to the UFJPI VP of Finance. The UFJPI VP of Finance will ensure that any new UFJPI employees are added to the monthly file sent to the sanctions/exclusions check vendor (e.g., John Sterling).

UFJPI Office of Compliance

On an annual and monthly basis, the Office of Compliance will ensure a review of the System for Award Management (SAM) List of Parties Excluded from Federal Programs, the HHS/OIG List of Excluded Individuals/Entities, the Florida Medicaid Exclusions List, and the Georgia Medicaid Exclusions List for all current employees, vendors, contract physicians or contractors is performed.

5. At present, the Office of Compliance coordinates a reasonable inquiry of OIG/SAM/Medicaid Exclusions on an annual and monthly basis with the contracted vendor (e.g., John Sterling Associates, LLC). The contracted vendor provides a written report of the findings at the completion of the sanction and exclusion check. At a minimum, the contracted vendor reviews the HHS Office of the Inspector General (OIG) Exclusions Program Searchable Database, the System for Award Management (SAM) website, and both the Florida and Georgia Medicaid Exclusion List websites.

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UFJPI employees are screened upon hire by the UFJPI Human Resources Department.

New Vendors and new Contractors are screened upon entry into the A/P system by the UFJPI Accounts Payable Department.

Contract Providers and Physicians are screened upon hire by the UF Health - Jacksonville Medical Staff Office.

Applicable business relationships are screened by the UF Health - Jacksonville Home Health and Hospice Departments.

Prior to entering into a contract with any individual or entity, Contract Services will verify that the individual or entity does not appear in any of the sanctions/exclusions databases referenced below.

If the Human Resources Department, Accounts Payable, Contract Services, UF Health – Jacksonville Medical Staff Office, or the Office of Compliance identifies an individual/entity who is or has become ineligible to participate in Federal health care programs or in federal procurement or non-procurement programs, the employee/physician will immediately be relieved from his/her responsibilities, or the business will immediately be discontinued. In all cases, the Office of Compliance will be notified within 48 hours.

Databases

Employee database, including physicians, will be obtained from the UFJPI Human Resources Department and the UF College of Medicine – Jacksonville Administrative Affairs Office and from these respective Human Resources systems.

Vendor and Contractor database will be obtained from the UFJPI Accounts Payable Department.

The Contract physician database will be obtained from the Provider Network Management Department.

Once all databases are received, a worksheet will be developed to track the review and results of each employee.

The following websites are reviewed for any potential matches to the database:

- System for Award Management (SAM)
<https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf>

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 - Georgia Medicaid Exclusions List
<https://dch.georgia.gov/georgia-oig-exclusions-list>

UF College of Medicine – Jacksonville Administrative Affairs Office

On a monthly basis the Associate Dean of Administrative Affairs for the UF College of Medicine – Jacksonville (or designee) shall send a list of new UF personnel (including full-time and part-time faculty, OPS providers, courtesy faculty, and UF Teams employees) to the UFJPI VP of Finance. The UFJPI VP of Finance will ensure that any new UF personnel are added to the monthly file sent to the sanctions/exclusions check vendor (e.g., John Sterling).

Audit Report

The contracted vendor generates a summary report with the findings from the monthly checks as well as the annual check. Copies of the summary reports are kept on file in the Compliance Department. The spreadsheets containing the names checked by the vendor are quite large and are kept on file in the UFJPI VP of Finance office.

Outcomes

If a match is located, the relationship with that individual/entity will be discontinued immediately.

REFERENCES:

APPROVED BY:

Maryann C. Palmeter