

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

Effective Date: 10/19/2017

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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, Providers/Suppliers, and all 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;
 4. CHS employees and contractors; and,
 5. [Optional] Other individuals (Participant Staff members).
- 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. [Option 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 Date of Birth (“DOB”) and/or their resident city and state.
- 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.

2. [Option 2] Perform a Batch Review of the Database

Download the entire Excluded Individuals and Entities (LEIE) Database File to a local computer and run the check.

- a. About the Updated LEIE (taken from LEIE Website):
 - i. The updated LEIE is a complete database containing all exclusions currently in effect.
 - ii. Individuals and entities who have been reinstated **are not included** in this file.
 - iii. This file is replaced with an updated version each month. These monthly “CSV” files can be saved to your computer. The file is viewable using a spreadsheet program such as Microsoft Excel.
- b. This file is complete and **should not** be used in conjunction with the monthly exclusion and reinstatement supplements. If no record appears upon submission, then there is no report of fraud or abuse related to that person.
- c. If the name being checked does appear, verify the name by the associated DOB and/or resident city and state. 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 the file or a screen shot.

E. If there is a match, the name of the individual must be reported as follows:

F. Participants will attest to the Governing Body 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.

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Reporting

- A. An OIG/GSA report will be sent to the Governing Body 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.