

HACKENSACK UNIVERSITY MEDICAL CENTER
Administrative Policy Manual

Employee, Medical Staff, & Vendor Screening

Procedure No. 551

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GENERAL

Purpose

The purpose of this policy is to assure the Medical Center is in compliance with federal guidance that prohibits providers from contracting with individuals or entities that have been excluded from participation in federal health care programs and to assure that all employees whose position requires a license from the State of New Jersey have a current, active license

Policy

Any individual considered for employment must have a background investigation to determine whether or not the applicant is listed on the Health and Human Services/Office of Inspector General's Cumulative HHS/OIG Sanction report and General Services Administration GSA list of Parties Excluded from Federal Programs and have a current license from the State of New Jersey

All vendors and contracted agents are screened for sanction or exclusion on the HHS/OIG and GSA listings during the vendor qualification process

Physicians are screened against the HHS/OIG listing and their licenses are verified as part of the initial and periodic determination of privileges and credentialing process.

Sanctions verification for current members, vendors, contractors and medical staff will be checked against the OIG cumulative Sanction report, the GSA, the Department of the Treasury Office of Foreign Assets Control (OFAC) exclusion listing or Terrorism sponsored organizations monthly.

The Medical Center will not contract with individuals or entities that have been excluded from participation in federal health care programs.

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Note: *The Medical Center uses the electronic system (BVerified by Besler Consulting) to conduct the screening and license verification process. This system assigns a relative risk based on name variations in order to capture any potential matches. Any risk score greater than 71% is investigated and the results documented. As part of the implementation process in June 2012, all incumbent employees and vendors were screened.*

Administration

The Vice President, Chief Compliance Officer is responsible for the administration and subsequent revisions of this policy.

PROCEDURE

Non-Employment of Sanctioned Individuals

Employees

The Medical Center's employment application will include an attestation where prospective employees will affirm that they are not included in the Department of Health and Human Services (DHHS) Office of the Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE).

AFTER A JOB OFFER HAS BEEN EXTENDED, BUT PRIOR TO BEGINNING WORK:

Corporate Compliance

Check for Sanction and Licensure verification in accordance with this policy. Any potential match of 71% or greater will be further investigated.

IF THERE IS A MATCH DURING THIS INITIAL SCREENING:

Corporate Compliance

Check HHS/OIG website to confirm match.

UPON CONFIRMATION:

Request clarification from the prospective employee.

IF THE EXCLUSION IS CONFIRMED:

Human Resources

Terminate the employment process.

Current Employees

ON A MONTHLY BASIS:

Human Resources

Provide the list of current employees as a database file.

Employee, Medical Staff, & Vendor Screening

Corporate Compliance Check the current employee and physician complement for Sanction and Licensure verification in accordance with this policy. Any potential match of 71% or greater will be further investigated

IF THERE IS A MATCH WHEN THE DATABASE FILES ARE COMPARED:

Corporate Compliance Check HHS/OIG website to confirm match

UPON RECEIPT OF THIS INFORMATION:

Request clarification from the employee in question.

IF THE EXCLUSION IS CONFIRMED AND THE EMPLOYEE IS UNABLE TO PROVIDE PROOF OF REINSTATEMENT:

Human Resources Terminate the employment of the sanctioned individual.

Medical Staff **Non-Appointment of Physicians**

Prospective physicians seeking to be credentialed will include an attestation affirming that they are not included in the Department of Health and Human Services (DHHS) Office of the Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE).

Medical Staff **PENDING THE GRANTING OF CREDENTIALS**

Check for sanction and license verification in accordance with this policy. Any potential match of 71% or greater will be further investigated.

Medical Staff **IF THERE IS A MATCH DURING THIS INITIAL SCREENING:**

Check HHS/OIG website to confirm match.

UPON RECEIPT OF THIS INFORMATION:

Request clarification from the physician.

Medical Staff **IF THE EXCLUSION IS CONFIRMED:**

Do not grant credentials.

**Current Physicians
ON A MONTHLY BASIS:**

Human Resources. Provide the list of current physicians as a database file.

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Corporate Compliance Check the current physician complement for Sanction and Licensure verification in accordance with this policy. Any potential match of 71% or greater will be further investigated

IF THERE IS A MATCH WHEN THE DATABASE FILES ARE COMPARED:

Corporate Compliance Check HHS/OIG website to confirm match.

Medical Staff **UPON RECEIPT OF THIS INFORMATION:**
Request clarification from the physician.

IF THE EXCLUSION IS CONFIRMED AND THE EMPLOYEE IS UNABLE TO PROVIDE PROOF OF REINSTATEMENT:

Medical Staff Suspend the privileges of the sanctioned individual.

Purchasing **Contracting with Sanctioned Individuals/Entities**
Purchasing's vendor qualification form will reflect the Medical Center's policy of not contracting with excluded individuals or entities. Contracts will include an attestation affirming that they are not included in the Department of Health and Human Services (DHHS) Office of the Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE).

Current Vendors
ON AN ANNUAL BASIS:

Corporate Compliance Check the list of current vendors against the LEIE. Any potential match of 71% or greater will be further investigated.

IF THERE IS A MATCH WHEN THE FILES ARE COMPARED:

Check HHS/OIG website to confirm match.

Purchasing **UPON RECEIPT OF THIS INFORMATION:**
Request clarification from the vendor.

IF THE EXCLUSION IS CONFIRMED AND THE VENDOR IS NOT ABLE TO PROVIDE PROOF OF REINSTATEMENT:

Director of Purchasing Cancel all orders with the vendor.

Updated: 09/12, 2/13