

**KING'S DAUGHTERS MEDICAL CENTER**

**MEDICAL STAFF AND  
ADMINISTRATIVE POLICY**

**POLICY AND PROCEDURE**

**EFFECTIVE DATE: 12/1/16**

**SUPERCEDES POLICY DATED:  
09/01/16; Reviewed Date:  
02/08/16; 04/20/15; 12/17/13;  
(COMPLIANCE PROGRAM  
POLICY A(6): 6/12/12);  
(MEDICAL STAFF AND  
ADMINISTRATIVE POLICY:  
12/1/10; 8/13/08)**

**FILE: SECTION I (27)**

**SUBJECT: SCREENING OF  
EMPLOYEES, MEDICAL  
STAFF, BOARD MEMBERS,  
AND CONTRACTORS FOR  
FEDERAL HEALTH CARE  
PROGRAM EXCLUSIONS**

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**POLICY:** The Federal government has the authority to exclude, debar, suspend, disqualify or otherwise declare ineligible individuals and entities who have engaged in fraud or abuse from participation in Medicare, Medicaid, and other Federal health care programs.

The Medical Center will perform initial, monthly and/or ongoing screenings to ensure that team members, vendors, contractors, agents, subcontractors, board members and credentialed medical staff members have not been sanctioned or excluded from participating in any federal health care program, and will not employ, contract with or grant privileges to any individual or entity that has been sanctioned or excluded.

**PROCEDURE:**

1. Screening and Documentation.
  - 1.1 Any potential and/or current team member, vendor, contractor, agent, subcontractor, board member and credentialed medical staff member must disclose to Medical Center if he, she or it is, or has ever been, sanctioned or excluded from participation in a federal health care program.

1.2 Those responsible (“Responsible Department”) for screening are:

Human Resources	Team members
Medical Affairs	Medical/Allied Health Staff Members
Materials Management/Accounting	Vendors, contractors, and subcontractors whose contract and/or relationship originates within Materials Management and/or Accounting
* Legal Services	Contractual relationships which are submitted pursuant to a Contract Request Form. Legal Services will perform (a) an initial search upon receipt of the contract request form and (b) a subsequent search prior to the execution of the agreement for those contracts where the initial search was performed greater than thirty (30) days of the execution of the agreement.
Administration Executive Assistant	Board members

1.3 Responsible Department shall utilize the internet-based software, VerifyComply, to perform the OIG and SAM searches as follows:

1.3.1. Prior to engaging services of the team member, vendor, contractor, agent, subcontractor, board member and medical staff member; and

1.3.2. Monthly screen all team members, vendors, contractors, agents, subcontractors, board members and medical staff members. Legal Services will perform only initial searches as provided in Paragraph 1.2 above.

1.4 Responsible Department shall maintain documentation of search results as follows:

1.4.1. Initial Search. The VerifyComply search results (identifying the date, time, and results) when team member, vendor, contractor, agent, subcontractor, board member and medical staff member is initially setup and/or established; and

1.4.2. Monthly Search. The VerifyComply monthly search results (identifying the date, time and results) when the consolidated master list is searched.

1.4.3. Documentation should be maintained in a backed up shared drive on a server or similar secure and retrievable location.

2. Positive Screening Results

2.1 The Responsible Department shall immediately report to the Compliance & Integrity Department if a team member, vendor, contractor, agent, subcontractor, board member and medical staff member is a confirmed match.

2.2 If Medical Center has actual notice that an individual/entity has become ineligible and/or excluded, Medical Center will remove such individual/entity from responsibility for, or involvement with, Medical Center's business operations related to the Federal health care programs and will remove such individual/entity from any position for which the individual/entity's compensation or the items or services furnished, ordered, or prescribed by the individual/entity are paid in whole or part, directly or indirectly, by Federal health care programs or otherwise with Federal funds at least until such time as the individual/entity is reinstated into participation in the Federal health care programs.

2.3 If Medical Center has actual notice that an individual/entity is charged with a criminal offense that falls within the scope of 42 U.S.C. § 1320a-7(a), 1320a-7(b)(1)-(3), or is proposed for exclusion during the individual/entity's employment or contract term or during the term of a physician's or other practitioner's medical staff privileges, Medical Center shall take all appropriate actions to ensure that the responsibilities of that individual/entity have not and shall not adversely affect the quality of care rendered to any beneficiary, patient, or resident, or any claims submitted to any Federal health care program.

2.4 The Responsible Department shall retain all documentation relied upon in resolving any possible matches on the federal databases, and forward a copy of the documentation to the Compliance & Integrity Department for entry in the Compliance Log. All such documents shall be maintained for a minimum of five (5) years.

3. Monitoring. The Compliance & Integrity Department will monitor the Responsible Departments' compliance with this Policy.

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President, Medical Staff

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President/CEO