SPRING-FORD AREA SCHOOL DISTRICT

SECTION: OPERATIONS

TITLE: SCREENING OF EMPLOYEES AND CONTRACTORS FOR EXCLUSION FROM PARTICIPATING IN FEDERAL HEALTH CARE PROGRAMS

ADOPTED: November 26, 2012

REVISED:

831. SCREENING OF EMPLOYEES AND CONTRACTORS FOR EXCLUSION FROM PARTICIPATING IN FEDERAL HEALTH CARE PROGRAMS

1. Purpose

As a health care provider that participates in the Medical Assistance (MA) Program, the Spring-Ford Area School District is required to screen its employees and contractors, both individuals and entities, to determine if they have been excluded from participation in Medicare, Medicaid, or any other federal health care program.

This regulation is designed to create the procedures for screening all employees and contractors at the time of hiring or contracting and, thereafter, ongoing on a monthly basis, as required by federal and state law.

2. Guidelines

Procedures For Screening Employees/Contractors

All employees, vendors, contractors, service providers, and referral sources that are associated directly or indirectly with a Medicaid/federally funded health care service should be screened at time of hire/contracting and monthly thereafter.

Examples of individuals or entities that the district should screen for exclusion include, but are not limited to:

1. Individual or entity who provides a service for which a claim is submitted to Medicaid;
2. Individual or entity who causes a claim to be generated to Medicaid;
3. Individual or entity whose income derives all, or in part, directly or indirectly, from Medicaid funds;
4. Independent contractors if they are billing for Medicaid services;
5. Referral sources, such as providers who send a Medicaid recipient to another provider for additional services or second opinion related to medical condition.

The district will check all three of the following databases to determine exclusion status:

a. ***Pennsylvania Medicheck List:*** a database maintained by the Department of Public Welfare that identifies providers, individuals, and other entities that are precluded from participation in Pennsylvania's MA Program: http://www.dpw.state.pa.us/publications/medichecksearch/index.htm

   If an individual's resume indicates that he/she has worked in another state, the district should also check that state's individual list (if available).

b. ***List of Excluded Individuals/Entities (LEIE)***: a database maintained by Department of Health and Human Services' Office of Inspector General that identifies individuals or entities that have been excluded nationwide from participation in any federal health care program. An individual or entity included on the list is ineligible to participate, either directly or indirectly, in the MA Program. Although the Department makes best efforts to include on the Medicheck List all federally excluded individuals/entities that practice in Pennsylvania, providers must also use the LEIE to ensure that the individual/entity is eligible to participate in the MA Program: http://oig.hhs.gov/fraud/report-fraud/index.asp

c. ***Excluded Parties List System (EPLS)***: World wide database maintained by the General Services Administration that provides information about parties that are excluded from receiving Federal contracts, certain subcontracts, and certain Federal financial and nonfinancial assistance and benefits: https://www.epls.gov/

The district will immediately self-report any discovered exclusion of an employee or contractor (for either an individual or entity) to the Bureau of Program Integrity using one of the following methods:

a. By e-mail through the MA Provider Compliance form at the following link:

   http://www.dpw.state.pa.us/learnaboutdpw/fraudandabuse/maprovidercompliancehotlineresponseform/index.htm

b. By U.S. mail at the following address:
   Bureau of Program Integrity
   Commonwealth of Pennsylvania
   P.O. Box 2675
   Harrisburg, PA 17105-2675

c. By fax at: (717) 772-4655 or (717) 772-4638

	The district will develop and maintain in a permanent file auditable documentation of screening efforts, including dates the screenings were performed and the source data checked and the date of most recent update. The district will periodically conduct self-audits to determine compliance with this screening requirement. If the district fails to prevent payments for items or services furnished or ordered by excluded individuals or entities, it may be subject to exclusion from participating in the MA Program and all Federal health care programs, recoupments of overpayments, and imposition of civil monetary penalties.