

**Subject: Exclusion Screening Policy**

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**Objective:**

- I. To ensure that Tuality Health Alliance (THA) monitors those that we employ, those that we contract with, those that we contract with to perform delegated activities, or those whom we pay to confirm that they are properly credentialed, licensed, and authorized to participate in Federal and State health care programs.

**Definitions:**

- A. The **Exclusion Lists** consist of the Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE) and the General Services Administration's (GSA) System of Award Management (SAM).
- B. **Initial Screening** consists of an initial Exclusion Lists review to ensure prospective employees, vendors, contractors, practitioners, Board members, committee members, and volunteers described below are eligible to participate in Federal health programs and to prevent hiring of or contracting with any Ineligible Person or Entity.
- C. **Recurring Screening** consists of on-going Exclusion Lists reviews to ensure that existing employees, vendors, contractors, practitioners, Board members, committee members, and volunteers described below continue to be eligible to participate in Federal health programs.
- D. **Screening Subjects** include the following groups:
  1. **Tuality Health Alliance Employees**
  2. **Tuality Health Alliance Board of Directors**
  3. **Tuality Health Alliance committee members**, any active member of a Tuality Health Alliance committee that does not fall into other screening categories.
  4. **Contractors/Vendors**, including any company or person who contracts with Tuality Health Alliance to perform or provide goods or a service.
  5. **Contracted Practitioners or Entities**, including any individual or entity who is authorized to provide services under applicable State law and who have been credentialed by Tuality Health Alliance or delegated credentialing by Tuality Health Alliance.

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6. **Rendering Practitioners or Entities**, including any individual or entity who is authorized to provide services under applicable State law, but who has not been credentialed by Tuality Health Alliance or delegated credential by Tuality Health Alliance.
  7. **Volunteers**, including any individual who serves at Tuality Health Alliance with the intention of donating their time and effort without any form of compensation.
- E. An **Ineligible Person or Entity** is an individual or entity who is currently excluded from participating in Medicaid or any other Federal health care program. Such persons or entities are listed on the Exclusion Lists.

**Policy:**

- A. We shall not employ or engage in a business relationship with anyone who is currently under sanction or exclusion by the DHHS OIG, or otherwise sanctioned by any other Federal or State enforcement agency, or licensing/disciplinary authority.
- B. We shall not employ or engage in a business relationship with any individual who has been convicted of a criminal offense related to health care, or who is listed as excluded or otherwise ineligible to participate in Federal health care programs.
- C. We shall remove individuals from direct responsibility for or involvement in furnishing any items or services paid for, in whole or in part, directly or indirectly, pending the resolution of any criminal charges or proposed administrative sanctions.
  1. If any practitioner or entity is identified as having criminal charges, a sanction, or exclusion placed upon them, this information is forwarded to the THA Medical Director for administrative action.
  2. If any contractor or vendor is identified as having criminal charges, a sanction or exclusion placed upon them, this information is forwarded to the THA Contracting Department for administrative action.
  3. If any volunteer, Board member, or committee member is identified as having criminal charges, a sanction or exclusion placed upon them, this information is forwarded to the THA Director for administrative action.

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4. If any employee is identified as having criminal charges, a sanction, or exclusion placed upon them, this information is forwarded to Tuality Healthcare Human Resources Department for administrative action.

**References:**

Oregon Health Authority Coordinated Care Organization Contract  
Health Share of Oregon – Tuality Health Alliance Contract  
THA Policy X-1 Credentialing  
THA Policy X-3 Practitioner Quality Monitoring/Appeals  
THA Policy X-13 Credentialing of Facilities/Organizations  
Codes of Federal Register, Title 42 Public Health Part 1001-Program Integrity-Medicare and State Health Care Programs  
The Office of Inspector General’s (OIG) List of Excluded Individuals/Entities (LEIE): <http://exclusions.oig.hhs.gov>  
The General Services Administration’s (GSA) Excluded Parties List (EPLS): <https://sam.gov/portal/public/SAM>

Formulated:	September 2018
Reviewed:	
Revised	