



Exclusion Background Checks – Contractors

Federal Regulations: 418.100(e), Social Security Act Sections 1128 and 1156	Effective Date: October 5, 2018
State Regulations:	Revision Date(s): February 27, 2023

PURPOSE: To assure proper exclusion background checks of contractors, vendors and other entities as no federally funded payment is to be made for any items or services furnished, ordered, or prescribed by an excluded individual or entity.

POLICY: Hospice does not contract with any person, vendor or other entity that is listed by federal or state agencies as debarred or excluded from participation in the federal healthcare program.

PROCEDURE:

- 1) The Business Office Manager will be responsible, prior to executing every new contract or written agreement and renewal, to verify the contractor/vendor status against the Office of Inspector Generals (OIG's) List of Excluded Individuals and Entities (LEIE) https://oig.hhs.gov/exclusions/exclusions_list.asp and The System for Award Management (SAM) database www.sam.gov.
- 2) If a new contractor/vendor is found excluded from participating in a federally funded healthcare program, the Administrator notifies the contractor/vendor that Hospice cannot contract with them.
- 3) Monthly, Hospice verifies that contractors/vendors are not listed on the Office of Inspector Generals (OIG's) List of Excluded Individuals and Entities (LEIE) or System for Award Management (SAM) database. If a contractor/vendor appears on either list, the contractor relationship is terminated. This function is outsourced to a third-party vendor.
- 4) Documentation of exclusion checks are maintained in the contract file.