

**Standard:**

AccessCNY will ensure compliance with all federal and state laws and regulations regarding exclusion screening. AccessCNY will not employ, contract with or conduct business with an individual or entity excluded from participation in state or federally sponsored health care programs such as Medicare and Medicaid.

**Procedure for Employees and Consultants:**

1. AccessCNY currently contracts with an exclusion software provider to run exclusion screenings for the agency. Exclusion screenings are completed prior to hire and on a monthly basis. The software runs names through the required databases:
  - HHS Office of Inspector General
  - Excluded Parties List System
  - NY Office of Medicaid inspector General
2. The Human Resource department will enter each prospective employee into the exclusion database prior to hiring an individual.
3. If a prospective employee's name shows up on any of the exclusion lists, AccessCNY will verify the information matches the prospective employee. Human Resources will notify the Quality Enhancement department to verify the findings. If the information is a match, the employee will be ineligible for hire and the Human Resource department will notify the prospective employee and the hiring manager.
4. Monthly, a member of Human Resources will receive an email from the exclusion database software with the results of the exclusion check. They will review the report and upload the results to SharePoint within 3 business days of receiving the email. If a current employee shows up on any of the exclusion lists during a monthly screening and the information confirms the employee's identification to be a match, Human Resources will notify the Quality Enhancement department to verify the findings. If verified, the Human Resources department and Program Supervisor will terminate the employee and notify AccessCNY's Compliance Officer. The Compliance Officer will follow the Self-Disclosure standard as it relates to this compliance concern.

## Procedure for Vendors/Contractors

1. All vendors, consultants and contractors' business names and business owners' names will be entered into the exclusion screening database by a member of the Finance Department and prior to accepting contractors or using the vendor for goods or services. Any and all staff seeking to make a purchase or contracting for services will check the vendor list on SharePoint for prior approval. If vendor is not on the list, staff must provide name of vendor and complete W9 form to a designee in the Finance Department to be run through the exclusion software prior to receiving approval.
2. If a prospective vendor/consultant/contractor shows up on any of the exclusion lists, a member of the Finance Department will verify the information matches vendor/contractor. The Finance Department will notify the Quality Enhancement department to verify the findings. If the information is a match, AccessCNY will be prohibited from conducting any business with the vendor/consultant/contractor.
3. Monthly, a member of the Finance Department will receive an email from the exclusion software with the results of the exclusion check. They will review the report and upload the results to SharePoint within 3 business days of receiving the email. If a current vendor/consultant/contractor shows up on any of the exclusion lists during a monthly screening and the information matches the vendor/contractor's identification, the Finance Department will notify the Quality Enhancement department to verify the findings. The Finance Department will remove the vendor/consultant/contractor from the approved vendor list and notify Senior Management in an email of the change. Members of Senior Management should then contact any programs that may be using the vendor to immediately stop and inform the Compliance Officer of vendor/consultant/contractor utilization. The Compliance Officer will follow the Self-Disclosure standard as it relates to this compliance concern. The approved vendor list will be updated in SharePoint by the designated Finance Department employee within 3 business days of any changes.

## Procedure for Physicians Writing Scripts for Services

1. Prior to providing Clinical services at AccessCNY, the designated Clinic staff will forward the physician's name writing the script for services to a designee in the Finance Department to enter the name into the exclusion screening database.

2. If a physician's name shows up on any of the exclusion lists, AccessCNY will verify the information matches the physician writing the script for services. If the information is a match, the Finance designee will notify the Quality Enhancement department to verify the findings and will inform the clinic staff that AccessCNY will be prohibited from providing services to the individual until a script from a non-excluded physician is received.
3. Monthly, the Finance designee will receive an email from the exclusion software with the results of the exclusion check. The designee will review the report and upload the results to SharePoint within 3 business days of receiving the email. If a physician who wrote a script for an individual currently receiving Clinic Services at AccessCNY shows up on any of the exclusion lists during a monthly screening, the designee will notify the Quality Enhancement department to verify the findings. If verified the Clinic designated staff will contact the individual receiving services to suspend services. AccessCNY will be prohibited from providing and billing for services until the individual obtains a new script from a non-excluded physician. The designated Clinic staff will add the physician's name to an excluded list and notify AccessCNY's Compliance Officer. The Compliance Officer will follow the Self-Disclosure standard as it relates to this compliance concern.

### **Procedure for Board Members**

1. Prior to election to AccessCNY's Board, the Executive Director or designee will forward the name(s) of potential Board members to the Recruitment Manager to enter names into the exclusion screening database.
2. If a Board member's name shows up on any of the exclusion lists, AccessCNY will verify the information. If the information is a match, the Recruitment Manager will notify the Quality Enhancement department to verify the findings and will inform the Executive Director that the Board member will not be eligible for Board membership. The Executive Director will share this information with the Compliance Committee of the Board.
3. Board members will be checked by the Compliance Officer in the exclusion database monthly. Results will be saved to SharePoint.

\* The Quality Enhancement Department will complete a spot check of the results of the exclusion checks quarterly to ensure they are being completed.