



PENINSULA RSN

HIPAA AND MEDICAID COMPLIANCE POLICIES AND PROCEDURES

Policy Name: PRSN OR AGENCY USE OF FEDERALLY EXCLUDED PROVIDERS

Policy Number: 5.18

Reference: 42 CFR 438.455, 456

Effective Date: 9/2005

Revision Date(s): 12/2011

Approved by: PRSN Executive Board

CROSS REFERENCES

- Plan: Compliance Plan, FY 2011
- Policy: Corrective Action Plan
- Policy: PRSN Fraud and Abuse Compliance Reporting Standards
- Table: PRSN Compliance Plan Checklist

PURPOSE

The PRSN shall not employ or contract with providers excluded from participation in Federal health care programs.

PROCEDURE

1. The PRSN shall not employ or contract with providers excluded from participation in Federal health care programs.
2. The PRSN requires network contractors to sign assurances that they are not excluded from participation and do not employ individuals who are excluded.
3. The network providers will conduct Federal Exclusion verification within thirty (30) days of hiring new employees. Existing employees shall have verification conducted during the month of August 2010, and every month thereafter.
4. The Federal Exclusion websites is the United States Health and Human Services at http://www.oig.hhs.gov/fraud/exclusions/exclusions_list.asp

5. All hired employees within the PRSN organization, network agencies, CommCare and the Ombuds programs will be evidenced via a website printout verifying they are not excluded from participation.
 - Network agencies are responsible for sending the PRSN Compliance Officer a monthly attestation letter that all employees, volunteers, interns, and Board members are not excluded providers.
 - The PRSN Compliance Officer is responsible for completing the exclusion verifications for the PRSN, Ombuds program, RMH, and provider agencies monthly.

MONITORING

This policy is mandated by contract or statute.

1. This policy will be monitored through use of PRSN:
 - Annual PRSN Provider and Subcontractor Administrative Review.
 - Random review of the Federal Websites, researching local network agency and providers
2. If a provider performs below expected standards during the review listed above, a Corrective Action will be required for PRSN approval. Reference PRSN Corrective Action Policy.