

Exclusion Screening Requirements and Instructions

Federal funds shall not be used to pay for services, equipment or drugs prescribed or provided by a provider, supplier, employee or First Tier, Downstream or Related Entity excluded by the General Services Administration or Department of Health and Human Services Office of the Inspector General.

As a First Tier, Downstream or Related Entity (FDR) of Health First Health Plans, your organization must conduct exclusion screening of your organization’s employees, temporary employees, volunteers, consultants, governing body members, contractors and downstream entities.

Exclusion screening is performed by reviewing two lists:

- the Office of the Inspector General (OIG)’s List of Excluded Individuals and Entities (LEIE) and
- the General Services Administration (GSA)’s System for Award Management (SAM).

Exclusion screening should be conducted:

- prior to the hiring or contracting and
- monthly thereafter.
 - Monthly screening is essential to prevent inappropriate payment to providers, pharmacies, and other entities that have been added to exclusions lists since the last time the list was checked.

SAM – System for Award Management

sam.gov

The General Services Administration administers SAM. SAM list includes non-health care contractors.

- Visit sam.gov.
- **Do not register. Do not create a User Account.**
- **Click on “Search Records” located in the top menu bar or the icon on the lower right.**

The screenshot shows the SAM.gov homepage. A red circle highlights the "SEARCH RECORDS" link in the top navigation menu. Another red circle highlights the "Search Records" icon in the "Getting Started" section, which includes a magnifying glass over a list icon. A yellow callout box at the top right says "A NEW WAY TO SIGN IN - If you already have a SAM account, use your SAM email for login.gov." and includes a "Log In" button and a link to "Login.gov FAQs". Below the navigation menu, there are two alert messages: "ALERT - June 11, 2018: Entities registering in SAM must submit a notarized letter appointing their authorized Entity Administrator. Read our updated FAQs to learn more about changes to the notarized letter review process and other system improvements." and "ALERT - Users who previously bookmarked this site will need to update their bookmark on November 5, 2018. Users may continue to navigate directly to sam.gov only the bookmarked url will be affected." Below the alerts, a section titled "The System for Award Management (SAM) is an official website of the U.S. government. There is no cost to use SAM. You can use this site for FREE to:" lists four bullet points: "Register to do business with the U.S. government", "Update or renew your entity registration", "Check status of an entity registration", and "Search for entity registration and exclusion records". The "Getting Started" section at the bottom features three icons: "Create A User Account" (person icon), "Register Entity" (folder icon), and "Search Records" (magnifying glass icon).

- A new screen appears titled Search Records.
 - On the right, click on: “ADVANCED SEARCH – EXCLUSION”

The screenshot shows the SAM System for Award Management website. At the top, there is a navigation bar with links for HOME, SEARCH RECORDS, DATA ACCESS, CHECK STATUS, ABOUT, and HELP. Below the navigation bar, there are two alert messages. The main content area is titled "Search Records" and includes "Search Tips to Get Started" with several bullet points. Below the tips, there is a section titled "Choose Quick Search or Advanced Search" which contains two search options: "QUICK SEARCH" and "ADVANCED SEARCH". The "ADVANCED SEARCH" section has three buttons: "ADVANCED SEARCH - ENTITY", "ADVANCED SEARCH - EXCLUSION" (which is circled in red), and "DISASTER RESPONSE REGISTRY SEARCH". A red arrow points from the "ADVANCED SEARCH - EXCLUSION" button to the instruction above.

- There will be a pop-up with Exclusion Search Tips, read them and click “Continue.”

The screenshot shows a pop-up window titled "Exclusion Search Tips". It contains four numbered items:

1. There may be instances when a Firm or Individual has the same name, or a similar name, as your search criteria but is actually a different party. Read the entire record to understand why the entity was excluded and what effect this exclusion has on your decision.
2. To verify a potential match or obtain additional information, contact the federal agency that created the exclusion record. Contact information for the designated Agency Point of Contact (POC) is linked to the Excluding Agency name within the record. You can also navigate to the Agency Exclusion POC page within SAM Help under Exclusions Information.
3. SAM does not have DUNS Number or CAGE Code identifiers for all Firm exclusion records. Therefore, a search by one of these fields alone may not be sufficient. Conduct an additional Name search if no results are found by the entity identifier.
4. If you search only on a particular classification type (e.g. Firm), you are potentially excluding exclusion records created under a different classification.

 At the bottom of the pop-up, there are two buttons: "Cancel" and "Continue" (which is circled in red). A red arrow points from the "Continue" button to the instruction above.

- A new screen appears titled Advanced Search - Exclusion.

- Choose your search method.

Single Search
 Multiple Names
 SSN/TIN Search

- If you want to search for exclusion records within a certain date range, use the Single Search approach.
- This is what appears when you click “Multiple Names.”
 - Type each name and click “SEARCH.”

- This is what appears when you click “SSN/TIN Search.”
 - If you choose the SSN/TIN approach, the name and SSN or TIN you enter must match exactly what is contained on an exclusion record for the result to be returned.

- If an exclusion record is found, it will display in a box marked “Exclusion” in purple:

- Check the status in the top-right corner of the box. If the status indicates “Active,” there is an active exclusion for that entity.
- Always make sure you read the exclusion record carefully. Names can be similar.
- If you have any doubt whether the exclusion record returned is the party for which you were searching, contact the Excluding Agency which created the exclusion record. There is a link to the Agency Exclusion POC in the record details.
- For more information, visit sam.gov/sam/transcript/Public - Identifying Excluded Entities.pdf

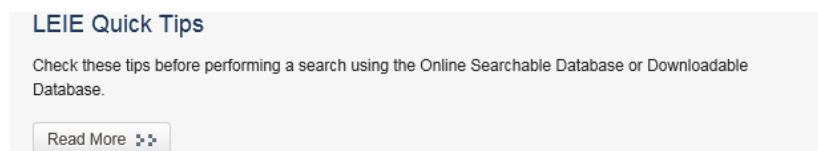
U.S. Department of Health and Human Services - Office of the Inspector General (OIG)'s List of Excluded Individuals/Entities (LEIE) includes all health care providers and suppliers that are excluded from participation in federal health care programs, including those health care providers and suppliers that might also be on the SAM list.

- Visit exclusions.oig.hhs.gov.
- If checking only a few names, use the Online Searchable Database to search up to five names at once.



- If checking many names, consider downloading the Downloadable Database into a spreadsheet or database program. This will enable the user to use that program's search functions to crosscheck the names against the thousands of names on the LEIE. Verify the correct spelling of any names before starting a search.
- Always remember to take the final step of identity verification using the Social Security Number (SSN) for an individual or Employer Identification Number (EIN) for an entity. It is not sufficient to simply find a matching name on the LEIE.
- For more information, visit exclusions.oig.hhs.gov, scroll down and click on:

- “Read More” under LEIE Quick Tips.



- “Read More” under Frequently Asked Questions.

