

1100.10 GOVERNMENT EXCLUSIONS CHECKS

Applies To:

Corporate

Nursing Centers

Home Health Care and Hospice

Affiliated Businesses

Issue Date: 04/17/2018

POLICY STATEMENT

It is the policy of HCR ManorCare to conduct background checks within the guidelines of the Office of the Inspector General (OIG) and the Excluded Parties List System (EPLS). All applicants who are offered employment will undergo government exclusion checks and job offers are contingent upon successful completion of these checks and other pre-employment requirements. A monthly government exclusions review is completed for employees, company medical directors and vendors.

PROCEDURES

1. The location is responsible for processing a MedScan OIG/GSA check on all applicants offered employment, which includes OIG and the System for Award Management (SAM)/EPLS, through the company-designated vendor. This verification is required to be completed prior to beginning employment.
2. All job offers are contingent upon successful completion of the MedScan OIG/GSA check and other pre-employment checks and policies. A positive match as an excluded individual will result in rescinding of the employment offer.
3. Any former employee who is applying for rehire will be required to undergo a MedScan OIG/GSA check prior to re-employment.
4. The Corporate office will complete a MedScan OIG/GSA check through the company-designated vendor for all medical directors as part of the initial credential process.
5. The corporate human resources department will be responsible for ensuring ongoing monthly federal (OIG and EPLS) and state exclusion/sanction checks are performed for all employees and medical directors.
 - A. If a location is contacted by corporate human resources with a possible employee match, the location must immediately suspend the employee without pay, pending investigation. The employee will be terminated as appropriate.
6. Corporate accounting is responsible for ensuring ongoing monthly OIG and EPLS background checks are performed for vendors.
 - A. If a possible medical director or vendor match is found, the respective corporate department or locations contracted with the medical director or vendor will be contacted and the medical director or vendor's services will be suspended pending investigation, and terminated as appropriate.

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7. Any current employee or applicant who appears to be a positive match will require additional investigation and depending on the outcome, may be barred from employment with HCR ManorCare. If the person misstated his/her status on the employment application, that omission/falsification is also reason for termination.
 8. Current employees who are found to be a positive match must be informed verbally or in writing of the results received. Employees may see the results and make a copy as well. If the employee challenges the accuracy of the results, he/she is responsible for correcting the errors with the federal or state agency/court involved. Current employees who challenge the results with the applicable government agency may be placed on unpaid suspension until the matter is resolved. If the current employee does not challenge the results, he/she will be terminated.
 9. The location's human resources designee must obtain information regarding the facts of the positive match and provide that information to the location manager.
 10. The location should consult with the Regional HR Manager and Regional Director of Operations for guidance, if necessary.

SPECIAL NEW JERSEY REQUIREMENTS:

It is the policy of HCR ManorCare to ensure that any payments received from the State of New Jersey are not for items or services that are directly or indirectly furnished, ordered, directed, managed or prescribed in whole or in part by an excluded, unlicensed or uncertified individual or entity. Excluded individuals or entities are those identified by the State or Federal government as not being allowed to participate in State or Federally-funded health benefit programs, such as Medicaid, New Jersey (NJ) FamilyCare, or Pharmaceutical Assistant to the Aged and Disabled (PAAD).

Providers are responsible for ensuring that any payments received from the State of New Jersey are not for items or services that are directly or indirectly furnished, ordered, directed, managed or prescribed in whole or in part by an excluded, unlicensed or uncertified individual or entity.

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PROCEDURES

1. The corporate office is responsible for verifying that any current or prospective employees (regular or temporary), contractors or subcontractors who directly or indirectly will be furnishing, ordering, directing, managing or prescribing items or services in whole or in part are not excluded, unlicensed or uncertified by searching the following databases on a monthly basis:
 - Federal exclusions database (mandatory) – <http://oig.hhs.gov/fraud/exclusions.asp>
 - New Jersey Treasurer’s exclusion database (mandatory) – www.state.nj.us/treasury/debarred/
 - New Jersey Division of Consumer Affairs licensure databases (mandatory) – <https://newjersey.mylicense.com/verification/> and <http://12.150.185.184/dca/>
 - New Jersey Department of Health and Senior Services licensure database (mandatory) – <http://www.state.nj.us/health/healthfacilities/search.shtml>
 - Certified nurse aide and personal care assistant registry (mandatory, if applicable) – <http://www.nj.gov/health/healthfacilities/certification-licensing/nurse-aide-pc-assistant/>
2. If a location is contacted by the corporate office with a possible employee match, the location must immediately suspend without pay, pending investigation, and depending on the outcome, may be terminated.
3. If the possible match is a medical director, contractor or subcontractor, the location will investigate and if found to be a positive match, cease use of the contractor or subcontractor as appropriate.

Original Issue Date: 06/01/02

Revision Date/s: 02/01/07, 07/01/12, 10/01/12, 06/01/15, 08/03/15, 04/17/18