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ChrisMannDivine (CMD) Staff Exclusion Screening Policy & Procedure

Effective Date: 2/26/2025

Reviewed & Approved By: Christina Akoi

Purpose

To ensure that CMD does not employ or contract with individuals or entities that are excluded from participation in Medicare, Medicaid, or any other federal health care programs, as required by the **Department of Human Services (DHS)** and the **Office of Developmental Programs (ODP)**. CMD complies with all exclusion list screening requirements, including the **List of Excluded Individuals and Entities (LEIE)**, the **System for Award Management (SAM)**, and **DHS's Medichex list**.

Scope

This policy applies to all CMD employees, contractors, and business entities providing in-home and community support services under CMD.

Exclusion Screening Requirements

CMD conducts exclusion screenings on all employees, contractors, and subcontractors using the following databases:

1. **List of Excluded Individuals and Entities (LEIE)** – Managed by the **Office of the Inspector General (OIG)**.
2. **System for Award Management (SAM)** – Maintained by the **General Services Administration (GSA)**.
3. **DHS's Medichex List** – Issued by the **Pennsylvania Department of Human Services**.

Procedure for Exclusion Screening

CMD follows a structured process for screening individuals and entities before hiring and on an ongoing basis:

1. **Pre-Employment & Pre-Contract Screening:**

- All candidates and contractors must be screened using **LEIE, SAM, and Medichack** before being hired or engaged.
- HR or a designated compliance officer will verify clearance through all three databases.
- Any individual or entity appearing on these lists will be **disqualified from employment or contracting**.

2. **Monthly Ongoing Exclusion Screening:**

- CMD performs **monthly checks** on all active employees and contractors.
- A **designated compliance officer** ensures that screenings are up to date and documented.
- If an individual or entity appears on an exclusion list after employment or contracting, CMD will **immediately take corrective action**.

3. **Documentation & Record-Keeping:**

- CMD maintains **detailed records** of all screening efforts, including:
 - Pre-employment screening results.
 - Monthly screening reports.
 - Any corrective action taken.
- Screening logs are stored securely and available for audit or review by regulatory agencies.

4. **Corrective Action for Non-Compliance:**

- If an employee or contractor is **found on an exclusion list**, CMD will:
 - **Immediately suspend or terminate** the individual or contract.
 - **Void any claims** associated with services provided by the excluded individual or entity.
 - Report the findings to ODP and any relevant authorities as required.
- CMD will take **preventative measures** to ensure future compliance and conduct a full internal review.

Ongoing Compliance & Auditing

CMD ensures continued adherence to exclusion screening policies through:

- **Quarterly internal audits** to verify compliance.
- **Annual staff training** on compliance and exclusion screening processes.
- **Policy updates** to reflect any changes in federal or state regulations.

Conclusion

CMD is committed to ensuring that all employees, contractors, and service providers are fully compliant with federal and state regulations regarding exclusion screening. By implementing this rigorous screening policy, CMD maintains its integrity and ensures high-quality care for individuals receiving services.

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