



Policies and Procedures

Policy Title Exclusion and Debarment			
Department Responsible Compliance and Integrity	Policy Code THN – 1.15	Effective Date May 2016	Next Review Date May 2017
Title of Person Responsible Compliance Officer	Approval Council Triad Healthcare Network Board of Managers		Approved Date May 24, 2016

PURPOSE

The purpose of this exclusion and debarment policy is to protect the interests of Triad Healthcare Network, LLC (THN) an Accountable Care Organization (ACO) and comply with applicable federal and state laws and regulations related to the employment and continued employment of individuals or entities who are ineligible to participate in any federal or state healthcare reimbursement program, including, but not limited to, the Centers for Medicare and Medicaid Services (CMS) Accountable Care Organizations.

DEFINITIONS

TERM	DEFINITION
ACO Participant	An entity identified by a Medicare-enrolled billing TIN through which one or more ACO providers/suppliers bill Medicare, that alone or together with one or more other ACO participants compose an ACO, and that is included on the list of ACO participants that is required under 42 C.F.R. § 425.118.
ACO Provider/Supplier	An individual or entity that: (1) is a provider or supplier under Medicare regulations; (2) is enrolled in Medicare; (3) bills for items and services furnished to Medicare fee-for-service beneficiaries during the agreement period under a Medicare billing number assigned to the TIN of an ACO participant; and (4) is included on the list of ACO providers/suppliers that is required under 42 C.F.R. § 425.118.
Ineligible Person	For purposes of this policy, any individual or entity that: (i) is currently excluded, suspended, debarred or otherwise ineligible to participate in Federal health care programs; (ii) has been convicted of a criminal offense related to the provision of health care items or services but has not yet been excluded, debarred or otherwise declared ineligible; or (iii) is currently excluded on a state exclusion list.

POLICY

It is the policy of THN to comply with all federal and state laws and regulations. THN will conduct exclusion and debarment screening of its members of the employees, members of the Board of Managers, ACO Participants, ACO Providers/Suppliers, and others acting on behalf of THN (temporary workers and vendors). Screening will be performed upon hire or employment and monthly thereafter.



RESPONSIBILITIES

Human Resources will screen all potential employees prior to hiring by:

- 1. Requiring applicants to disclose whether they are ineligible; and
- 2. Reviewing the Department of Health and Human Services Office of Inspector General List of Excluded Individuals and Entities (LEIE) or the System for Sward Management (SAM) (formerly the Excluded Parties List System).

Management will:

- 1. Require vendors, including temporary workers and physicians to disclose whether they are ineligible; and
- 2. Provide the names of vendors, including temporary workers and physicians prior to beginning work or acting on behalf of THN to the Compliance and Integrity Office for screening.

Compliance and Integrity Office will:

- 1. Conduct monthly screenings of the LEIE and SAM exclusion debarment lists to help ensure that no Board of Managers, employees, or others acting on behalf of THN (temporary workers and vendors), including ACO Participants and ACO Provider/Suppliers are listed as excluded or debarred; and
- 2. Maintain confirmation that screening have been completed.

POLICY VIOLATIONS

Applicants found to be debarred or excluded will not be hired. After being hired, if THN identifies an ineligible individual/entity in the exclusion and debarment verification process, the Compliance and Integrity Office will work with THN Legal Counsel and the Vice President and Chief Compliance and Privacy Officer for Cone Health Audit and Compliance Services for advice and direction on proceeding with an appropriate course of action, up to and including termination of employment or contract with THN.

REFERENCE DOCUMENTS/LINKS

42 CFR 425.304 (b)

ATTACHEMENT

N/A

PREVIOUS REVISION/REVIEW DATES

Date	Reviewed	Revised	Notes
N/A	N/A	N/A	This is a new policy.