

PROHIBITED CONDUCT

Exclusion List Policy

The OIG, by Congressional mandate, established a program under which certain individuals are excluded from participating in Federal healthcare programs (§§ 1128 and 1156 of the Social Security Act [SSA]). Federal healthcare programs are prohibited from making payment for any items or services furnished, ordered, or prescribed by an excluded individual or entity. The OIG maintains a List of Excluded Individuals and Entities.

1. [REDACTED] will not contract with, employ, or bill for services rendered by, an individual or entity on the OIG List.
2. The Practice acknowledges that no payment may be made by a Federal healthcare program during the period of exclusion for any item or service furnished, ordered, or prescribed by an individual or entity on the OIG List for any Federally funded healthcare program, including but not limited to:
 - a. Medicare (SSA Title XVIII);
 - b. Medicaid (SSA Title XIX);
 - c. Maternal and Child Health Services Block Grant (SSA Title V);
 - d. Block Grants to States for Social Services (SSA Title XX);
 - e. State Children's Health Insurance (SSA Title XXI); and
 - f. TriCare.
3. The Practice will check the OIG List prior to employing any provider or staff member or engaging in a business relationship with any entity. The Practice will also periodically check the OIG List regarding its current providers and staff members, and any entities with which it does business.

The Practice understands that no program payment is to be made DURING THE PERIOD OF EXCLUSION for any items or services furnished, ordered, or prescribed by an excluded individual or entity FOR ANY FEDERALLY FUNDED HEALTH CARE PROGRAM, INCLUDING: Medicare (Title XVIII), Medicaid (Title XIX), Maternal and Child Health Services Block Grant (Title V), Block Grants to States for Social Services (Title XX), State Children's Health Insurance (Title XXI programs, TRICARE, the veterans' programs, etc.

the rule now is before hire and every month thereafter.

and CMS requires that you retain the patient records for 10 years.

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4. When checking the OIG List, the Practice will search the applicable database using all names the Practice knows have been used by the individual or entity.
 5. The Practice will document the initial individual or entity search and any subsequent searches performed (e.g., a printed screen shot of the search results).
 6. Additional information about this Exclusion List Policy is included in this Manual.

Resources

- OIG List of Excluded Individuals and Entities:
<http://oig.hhs.gov/exclusions>
- Exclusion List Policy Additional Information (**Appendix I** [p. 87] to this Manual)
- Exclusion List Certification Form (**Appendix J** [p. 89] to this Manual)