

Excluded Providers  
POLICY: AC.ETH.01.07

Date: August, 1999

Responsible to: President/CEO

**PURPOSE:**

To provide guidelines to all Shepherd Center and Affiliates staff on excluding all individuals, vendors or contractors from employment or contracting for goods or services, if individual, vendor or contractor is a listed as an "excluded provider" from participation in federal healthcare programs.

**POLICY:**

Shepherd Center and Affiliates will not knowingly employ or enter into a contract with any individuals or entity that is currently excluded from participation in federal healthcare programs. To this end, physician, paraprofessionals, employees, contractors and vendors will be checked on the CMS Internet site "cumulative sanctions list". All vendors, physicians and employees will be checked each thirty days through an outside independent service against the CMS sanctions list. Any "hits" will be reported within 24 hours to the Chief Compliance Officer.

**PROCEDURE:**

1. Medical Staff - All physicians who make a request for appointment for clinical privileges or are due for reappointment, will be checked against the cumulative sanctions list for exclusion from participation in federal healthcare programs. All employed physicians and paraprofessionals (physician assistant, nurse practitioner) that have privileges at Shepherd Center will be checked against the cumulative sanction list\* every thirty days by an outside independent service.
2. Employees - All new employees will be checked against the cumulative sanctions list\* during their pre-employment background check. All employees will also be checked each thirty days through an outside independent service.
3. Contractors/Vendors - All staff employing contract labor or using a vendor for the first time must check the individual or entity against the \*cumulative sanctions list prior to using this individual or entity. Semiannually, Materials Management will check all listed vendors against the cumulative sanctions list.\* Vendors will be checked every thirty days by an outside independent service.

**\*Internet site: Cumulative Sanctions List:<http://www.dhhs.gov/progorg/oig>**