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|  <b>HAWAII HEALTH SYSTEMS<br/>CORPORATION</b><br><i>Quality Healthcare for All</i> | <b>Department:</b><br><br><b>Corporate Compliance</b>                | <b>Policy No.</b><br><br><b>CMP 0053A</b>   |
|   |  | <b>Supersedes Policy No.</b>                |
| <b>POLICY</b>   | <b>Approved By:</b><br><br><i>Brenda S. Ho</i>                       | <b>Approved Date:</b><br><br>April 23, 2026 |
| <b>Subject:</b><br><br><b>EXCLUSION AND SANCTION<br/>MONITORING</b>   | HHSC Board of Directors<br>By: Brenda Ho<br>Its: Secretary/Treasurer | <b>Last Reviewed:</b><br><br>April 23, 2026 |

**I. PURPOSE:**

The purpose of this policy is to ensure that Hawaii Health Systems Corporation (HHSC) does not employ, contract with, or otherwise engage individuals or entities that are excluded, debarred, suspended, or otherwise ineligible to participate in federal health care programs, state health care programs, or other government-funded programs. This policy also establishes the frequency of verification of medical providers, employees, vendors, and agents against applicable exclusion and sanction lists, and outlines the consequences when matches are identified.

**II. SCOPE:**

The policy applies to:

- All workforce members (employees, volunteers, trainees, contractors, and temporary staff).
- Physicians, allied health professionals, and other licensed practitioners.
- Vendors, suppliers, and contractors providing goods or services directly or indirectly paid for with federal or state health care funds.

**III. DEFINITIONS:**

Medical Providers: Physicians, allied health professionals, and others who provide clinical services at HHSC and are credentialed and/or privileged by HHSC facilities.

Excluded and Sanctions List: Government-published lists identifying individuals and entities that are excluded from participating in federal or state health care programs, including, but not limited to:

- The Office of the Inspector General (OIG) List of Excluded Individuals/Entities (LEIE).
- The System for Award Management (SAM) database.
- Applicable state Medicaid exclusion or sanction lists.

**IV. POLICY:**

**A. Screening Requirements:**

1. HHSC will use approved third-party software to screen the names of all employees, medical providers, vendors, contractors, and agents against federal and state exclusion and sanction lists prior to:
  - a. Initial hire

- b. Credentialing or privileging
- c. Contract award
2. Thereafter, screenings will be conducted **monthly**.

**B. Additional Lists:**

1. Other exclusion or sanction lists may be used as approved by the Chief Compliance and Privacy Officer (CCPO) and the President and Chief Executive Officer (CEO).

**C. Positive Matches:**

1. If an individual or entity is confirmed to be excluded:
  - a. They will be immediately removed from all federally or state-funded program activities.
  - b. Any provider or entity determined to be excluded from participating in Medicare, Medicaid, or other federal or state healthcare programs will be reviewed and appropriate action will be taken, up to and including termination of employment or contractual relationships with HHSC. Disclosure to federal and/or state authorities will be made as required.
2. For exclusions not directly related to Medicare or Medicaid:
  - a. The case will be reviewed by HHSC management, the CCPO, and the Vice President & General Counsel.
  - b. Final determination of appropriate action will be made by the President & CEO or the Regional CEO.

**D. Documentation & Recordkeeping:**

1. All screening results and related documentation will be retained for 10 years after the record is created.
2. Documentation must be available for internal or external audit upon request.

**E. Facility Responsibilities:**

1. Each HHSC facility shall implement procedures necessary to comply with this policy.

**V. APPLICABILITY:** This Policy applies to all HHSC facilities.

**VI. AUTHORITY:**

- Sections 1128 and 1156 of the Social Security Act
- 442 U.S.C. § 1320a-7 (Exclusion Statute)
- 42 CFR § 1001 (OIG Exclusions)
- OIG LEIE Database
- SAM.gov Exclusion Database
- Applicable State Medicaid Exclusion Lists

**VII. RELATED POLICIES AND PROCEDURE(S):** None

**VIII. REFERENCES:** None