

 HAWAII HEALTH SYSTEMS C O R P O R A T I O N "Quality Healthcare for All" POLICY	Quality Through Compliance	Policy No.: CMP 0053A
		Revision No.:
Subject: Exclusions and Sanctions Policy	Issued by: Audit and Compliance Committee	Effective Date: October 17, 2013
	Approved by:  HHSC Board of Directors By: Carol VanCamp Its: Secretary/Treasurer	Supersedes Policy: Page: 1 of 2

Last Reviewed: August 19, 2013; Next Review: August 19, 2016

- I. **PURPOSE:** This Policy establishes the frequency for which HHSC verifies medical providers, employees, vendors, and agents against established excluded and sanctions lists and consequences when there are matches on these lists.

- II. **DEFINITIONS:**

Medical providers: Physicians, nurse practitioners, and others who provide clinical services in HHSC providers and are credentialed and/or privileged by HHSC facilities.

Excluded and Sanctions Lists: Lists published by government agencies listing entities excluded from providing various medical and clinical services.

- III. **POLICY:**
 - A. Hawaii Health Systems Corporation (HHSC) will compare the names of all employees, medical providers, vendors, contractors, and agents against published exclusion and sanction lists from the Office of Inspector General (OIG), the General Services Administration (GSA), and the Hawaii Medicaid Exclusion List prior to initial hire or award and thereafter on a monthly basis.

 - B. Other lists of excluded and sanctioned providers may be utilized by HHSC as approved by the Chief Compliance and Privacy Officer and the President and Chief Executive Officer.

 - C. Any medical provider, employee, vendor, contractor, and/or agent excluded from providing Medicare or Medicaid services on the OIG list shall be terminated from HHSC employment or contract.

 - D. Matches of medical providers, employees, vendors, contractors, and/or agents with names on list(s) that are excluded from providing various other services (other than Medicare or Medicaid) shall be reviewed by HHSC management, the Chief Compliance and Privacy Officer, and HHSC Vice President and General Counsel with a final determination of appropriate action made by the President and Chief Executive Officer or the Regional Chief Executive Officer.

E. HHSC facilities shall implement procedures to implement this Policy.

IV. APPLICABILITY: This Policy applies to all HHSC facilities.

V. AUTHORITY: Sections 1128 and 1156 of Social Security Act. 42 CFR 1001.3001 through 1001.3005

VI. ATTACHMENTS: Procedure CMP 0053B