



# Policy & Procedure

CORPORATE COMPLIANCE PROGRAM  
**SCREENING INDIVIDUALS AND ORGANIZATIONS  
FOR GOVERNMENT PROGRAM VIOLATIONS**

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<b>FUNCTION</b>
Administration
<b>NUMBER</b>
VI.H
<b>ISSUED</b>
June 2000
<b>REVISED</b>
1/06; 12/09; 6/10; 12/13

## PURPOSE

- To ensure that The Evangelical Lutheran Good Samaritan Society does not employ individuals, nor transact business with vendors, contractors or practitioners who have been sanctioned by the United States government for program violations

## POLICY

The Evangelical Lutheran Good Samaritan Society will take reasonable steps to assure it acts in accordance with regulations forbidding employment relationships with individuals sanctioned for government health program violations. Additionally, reasonable steps will be taken to assure that the Society does not enter into business relationships with sanctioned entities, contractors or vendors and also that the Society does not allow sanctioned practitioners or contractors to care for its residents or clients.

## PROCEDURE

1. Centers/campuses will check the Office of Inspector General's List of Excluded Individuals/Entities before a conditional offer is extended to an applicant. Refer to **Office of Inspector General (OIG) and Government Services Administration (GSA) Checks** (II.B.14) in the **HUMAN RESOURCES MANUAL**.
2. Information Services will update the Society's sanctioned individuals and entities file from the U.S. Department of Health and Human Services, Office of Inspector General (OIG) data bases every month and quarterly from the Excluded Parties List System (EPLS), and Information Services will then execute the program which compares the Society's database of employees, vendors, contractors and practitioners with the sanctions lists to determine if there are any matches using the best available unique identifier (e.g., Social Security number, Unique Provider Identification Number).
3. If no matches are found, the report verifying such will be filed in the Corporate Compliance Office.
4. If matches are found they should be handled as follows:
  - a. For employee matches:
    - 1) The corporate compliance officer or his/her designee will verify the match utilizing the OIG or EPLS online search feature to match on the employee's Social Security number.

- 2) A National Campus Human Resources representative will work with the administrator or sub-system director to ask the employee in question whether he/she is under any government health program sanctions. If he/she affirms that he/she is, the employee in question will be immediately terminated. If the employee denies knowledge of government program sanctions, he/she will be suspended until verification is received from the OIG. If the OIG verifies the suspected employee is the same as an individual listed on the OIG sanction list, the employee will be immediately terminated.
  - b. For vendor matches:
    - 1) The National Campus Purchasing Sub-system staff will determine if the vendor is part of the Society's National Purchasing Program or if the vendor is utilized locally by one or more campuses.
    - 2) If a match is determined, a National Campus purchasing representative will contact the vendor to verify if it is sanctioned for government health program violations. If the vendor verifies it is sanctioned for government program violations, the Society shall immediately cease its business relationship with the vendor.
    - 3) If the vendor denies that it is sanctioned for government program violations, the matter will be turned over to the Society's corporate compliance officer for further investigation with the OIG or EPLS to determine whether the suspected vendor is actually sanctioned. If it is determined that the vendor is under government program sanctions, the Society will immediately cease transacting business with the sanctioned vendor.
  - c. For contractor or practitioner matches:
    - 1) Staff from the Development and Operation Delivery Systems, together with the Society's corporate compliance officer, will investigate with the OIG or EPLS to determine whether the suspected contractor or practitioner is in fact the correct match for the one on the sanctioned list.
    - 2) If investigation verifies the contractor or practitioner is the one who matched on the sanctions list, the Society's corporate compliance officer will contact the administrator at the campus where the practitioner or contractor has worked to ensure that the Society discontinues its business relationship with the sanctioned contractor or practitioner and the sanctioned contractor or practitioner discontinues caring for residents placed within the Society's responsibility.
5. If The Evangelical Lutheran Good Samaritan Society determines a sanctioned individual, vendor, contractor or practitioner has been in our employ, sold us supplies or services or has participated in the care of our residents, the matter will be investigated by the Society's corporate compliance officer to determine the extent to which remedial means must be taken including repayment of any governmental funding inappropriately received.