



**POLICY: Employee Screening for Exclusion from Federal Healthcare Programs**

Original Implementation Date:	3/18	Date Reviewed/ Revised:	1/29/20	Area of Responsibility:	Compliance	Version:	1
-------------------------------	------	-------------------------	---------	-------------------------	------------	----------	---

**PURPOSE:** To ensure that Sun Health does not employ or contact with individuals who are excluded by the Office of the Inspector General (OIG) to work in a healthcare facility. This policy is adopted in accordance with Risk Area (D) OIG Exclusion of the *Sun Health Code of Conduct and Corporate Compliance Plan*.

**POLICY:** Our policy is to verify that all employees, physicians, practitioners, and contracted employees that provide services to residents have not been excluded from participation in any federal health care program.

**Policy Explanation and Compliance Guidelines:**

1. Background checks and verification of employment eligibility status will be conducted in accordance with our established policies and procedures governing these issues.
2. Potential employees, physicians, practitioners, and contractors that will provide services to residents must certify (e.g. on the employment or contract application) that they have not been convicted of an offense that would preclude employment in a healthcare facility and that they are not excluded from participation in the federal health care programs.
3. Current employees must report if, subsequent to their employment or initiation of the contract, they are convicted of an offense that would preclude employment in a healthcare facility or are excluded from participation in any federal health program.
4. Employment agencies, or other contracted service agencies that assign temporary staff to the facility will be required to prove that they have undergone background checks to verify staff have not been convicted of an offense that would preclude employment in the facility. The HR Department will retain any supporting documentation.
5. The HR Department will check the OIG’s List of Excluded Individuals/ Entities (LEIE database) to verify that new employees are not excluded from participating in the federal health care programs. Verification will be documented in the employee’s file.
6. The HR Department will recheck the LEIE database annually to verify the participation/exclusion status of current employees and independent contractors, and will retain documentation of those queries.
7. Any conviction, debarment, or exclusion, that precludes employment in a healthcare facility, will result in termination of the employee or independent contractor.

**RELATED POLICIES:** *Sun Health Code of Conduct and Corporate Compliance Plan; Fingerprint Clearance Cards; Background Investigation and Reference Checks.*