

Exclusion Checking

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Performance Network



Overview

BILHPN contracts require participants to ensure that billing providers, employees, and vendors are not barred from participation in state and federal healthcare programs (e.g., Medicaid and Medicare).

To minimize legal risk, BILHPN must verify that all provider organizations (including private practice participants) are also in compliance with this contractual requirement. This requires verification that private practices are conducting "**exclusion checking**."

Exclusion checking is the process of verifying that a current or potential provider, employee, or vendor is not classified as an excluded individual or entity who is prohibited from participation in any State or Federal Healthcare Program.

Importance of exclusion checking

A provider can be subject to **civil monetary penalties** (CMP) if an individual barred from participating in Medicare / Medicaid programs (excluded individual/entity) participates in any way in the **furnishing of items or services that are payable by a Federal Healthcare Program** (including a vendor or employee who assists the provider in delivering care).

Physician Organizations (PO) **must** conduct exclusion checks when initially hiring a new employee, as part of the onboarding process, as well as prior to contracting any new vendors, and then annually thereafter. However, exclusion lists are updated on a monthly basis and **it is recommended that providers check for exclusions every 30 days as a best practice.**

Evidence of conducted exclusion checks for each employee and every vendor must be retained in electronic format for 10 years, and available for annual audits, or as requested.

Websites to perform exclusion checking



List of Excluded Individuals/Entities (LEIE)

<https://exclusions.oig.hhs.gov/>



System for Award Management (SAM)

<https://sam.gov/content/entity-information>



MassHealth Suspended or Excluded Providers

<https://www.mass.gov/service-details/learn-about-suspended-or-excluded-masshealth-providers>

Documenting Exclusion Checks

MassHealth Website

SAM Website

OIG Website

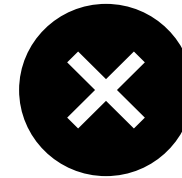
*Documentation must be retained for 10 years per CMS requirements

Do's and Don'ts of Exclusion Checking:



Do Check:

- Aliases/Maiden Names
- Similar Names
- Hyphenated Names (if name is Mary Jones-Smith check both Mary Jones and Mary Smith)
- SSN/TIN's



Don't:

- Check only 1 of 3 websites
- Ignore matching names from another state

Audit

BILHPN will conduct a small exclusion checking audit of a few practices per entity to ensure that exclusion checking is being performed.

Documentation for each employee, as well as any vendors used will be requested.

Questions and exclusion reporting

For exclusion checking questions or findings please contact:

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