



Exclusion Background Checks for Physicians

Federal Regulations: 418.22(c), 418.304 Social Security Act Sections 1128 and 1156	Effective Date: October 5, 2018
State Regulations:	Revision Date(s): February 27, 2023

PURPOSE: To assure proper exclusion background checks of all physicians who prescribe, certify, or provide care that is billed by the hospice as no federally funded payment is made for any items or services furnished, ordered, or prescribed by an excluded individual or entity.

POLICY: Hospice does not contract with, receive orders or certifications from or bill for any services provided by any physician or nurse practitioner who is listed by federal, or state agencies as debarred or excluded from participation in the federal healthcare program.

PROCEDURE:

- 1) The Business Office Manager will be responsible, prior to executing every new contract or written agreement, to verify the physician status against the Office of Inspector General's (OIG's) List of Excluded Individuals and Entities (LEIE) https://oig.hhs.gov/exclusions/exclusions_list.asp and The System for Award Management (SAM) database www.sam.gov.
- 2) If a new physician is found excluded from participating in a federally funded healthcare program, the Administrator notifies the physician that Hospice cannot contract with them.
- 3) Monthly, Hospice verifies that contracted physicians are not listed on the OIG's List of Excluded Individuals and Entities (LEIE) or System for Award Management (SAM) database. If a physician appears on either list, the contractor relationship is terminated. This function is outsourced to a third-party vendor.
- 4) Documentation of exclusion checks is maintained.