POLICY AND PROCEDURE:
EMPLOYEE, BOARD AND CONTRACTOR EXCLUSION 
SCREENING 

SCOPE OF POLICY
This policy applies to all CFS employees, including trainees, volunteers, consultants, contractors or subcontractors, providers and business vendors as well as The Board of Directors.

STATEMENT OF PURPOSE
The Center for Family Support (CFS) is committed to maintaining quality care and service as well as integrity in its financial and business operations. Therefore, CFS will conduct appropriate screening of key providers, Board Members, employees, independent contractors, and business vendors for the purpose of ensuring that they have not been excluded by federal or state law enforcement, regulatory, or licensing agency to provide service to and/or for The Center for Family Support.

STATEMENT OF POLICY
It is the policy of The Center for Family Support not to employ, contract with, or conduct business with an individual or entity excluded from participation in federally sponsored health care programs, such as Medicare and Medicaid.

CFS will conduct exclusion (sanction) screening of all current and potential employees, Board members and independent contractors. CFS will verify that entities and businesses that provide and/or perform services for CFS have not been the subject of adverse governmental actions and/or excluded from the federal and/or state & local healthcare programs.

An annual audit of employment applications and business entities with which CFS enters into a contractual relationship will be conducted by the CFS Corporate Compliance Officer and CFS Quality Assurance personnel to verify that this policy is enforced. A report of this audit will be made to the Executive Director and the Corporate Compliance Committee, along with any recommendations for remedial actions or improvement to the process as part of the annual compliance report.

IMPLEMENTATION OF POLICY
1. The Center for Family Support’s Human Resource personnel will conduct exclusion (sanction) checks to verify that all employees, Board members and independent contractors have not been excluded from federal and/or state &
local healthcare programs. An exclusion check is a search of the following to determine if the individual or entity’s name appears on any of the following lists:


  AND

- The General Services Administration (GSA)’s Excluded Parties List System available on the GSA website at http://www.epls.gov/

  AND

- NYS Medicaid Fraud Database available on the NYS Department of Health website at http://www.health.state.ny.us/nydoh/medicaid/dqprvpg.htm

2. An exclusion check will be performed on all applicants for employment as part of the pre-employment screening process. If the exclusion check indicates that any individual has been excluded from federal healthcare programs, the applicant will not be offered employment.

3. An exclusion check will be performed for potential Board members as part of the screening process. If the exclusion check indicates that a potential Board member has been excluded from federal healthcare programs, the individual will not be considered for Board affiliation.

4. The CFS representative responsible for the arrangements with and negotiations with independent contractors shall be responsible for ensuring that the CFS Human Resources Department personnel conduct exclusion checks prior to entering an agreement with any independent contractor or business entity. If the exclusion check indicates that a contractor has been excluded from federal healthcare programs, the contract will not be executed.

5. The Assistant Executive Director shall assure that an exclusion check of the business entity, in addition to the one conducted prior to entering a business contract with the vendor, is also done and at least annually thereafter, as long as business is conducted with said contractor or business vendor. If the annual exclusion check indicates that any individual vendor or entity has been excluded from federal healthcare programs, the individual or entity can not continue to be utilized and the contract will be immediately terminated.

6. The Human Resources Director will assure that exclusion checks of all employees are conducted at least annually. If the annual exclusion check
indicates that any individual has been excluded from federal healthcare programs, the individual can not continue to be employed by or conduct any business with CFS. The employment will be immediately terminated.

7. If any CFS employee or Board member is charged with a criminal offense related to healthcare, or is proposed or found to be subject to exclusion from federal healthcare programs, the employee or Board member must immediately suspended from all responsibilities and activities with CFS while the matter is pending. If the matter results in conviction or exclusion, CFS will immediately terminate the employee’s or Board member’s affiliation with CFS.

8. In addition to exclusion screening, the credentials of medical/healthcare professionals employed by CFS or with whom they establish a contractual business relationship will be verified with appropriate licensing and disciplining authorities, including any adverse actions taken against the individuals that might impair his or her performance of duties, or fiduciary responsibilities on behalf of The Center for Family Support. The process will include, but not be limited to health care practitioners for which the license is required for the performance of their duties. The screening and verification will be conducted by the Human Resources department as part of the hiring process or prior to entering a contractual agreement and at least annually thereafter.

9. The Human Resources department shall maintain the results of all exclusion checks for employees. The Assistant Executive Director will maintain the results of all exclusion checks for all business entities, vendors and individual business contractors. The Executive Director will maintain the results of all exclusion checks for CFS Board members.

10. An annual audit of a random sample of employment applications and business entities with which CFS enters into a business relationship will be conducted by the Corporate Compliance Officer to verify that this policy is enforced. A report of the results of this audit will be provided to the Corporate Compliance Committee and to the Executive Director, along with any recommendations for remedial actions or improvement to the process as part of the annual compliance report.