Applicability: UW Medicine

Policy Title: Exclusion Screening

Policy Number: COMP.007

Superseded Policies: HMC, 135.4 Staff and Vendor Screening
NWH, Independent Contractor & Vendor Exclusion Screening
VMC, Employee, Independent Contractor and Vendor Screening Policy & Procedure
UWMC, 15-6 Employee Screening
UWMC, 15-14 Vendor Screening
UWP, C-015 Employee and Vendor Screening

Date Established: October 11, 2017

Date Effective: November 20, 2020

Next Review Date: November 20, 2023

PURPOSE
This policy establishes the standards by which UW Medicine screens all workforce members and vendors for restrictions on their ability to participate in federal and state healthcare programs and contracts.

This policy applies to all UW Medicine departments and operational units that perform exclusion screening.

DEFINITIONS
See UW Medicine Compliance Glossary.

POLICY
UW Medicine does not hire, grant privileges to, contract with or bill for services rendered by the individuals and vendors who:

- Are excluded, debarred, suspended or otherwise declared ineligible to participate in federal healthcare programs or contracts;
- Have been convicted of a criminal offense as defined by 42 U.S.C. § 1320a-7(a) but have not been excluded, debarred, suspended or otherwise declared ineligible to participate in federal healthcare programs.

1 UW Medicine refers to the seven UW Medicine entities: Harborview Medical Center (HMC), Valley Medical Center (VMC), UW Medical Center (UWMC), UW Neighborhood Clinics (UWNC), UW Physicians (UWP), UW School of Medicine (UW SoM), and Airlift Northwest (ALNW).
I. Initial Hiring, Credentialing, and Contracting

A. Prior to hiring or privileging/credentialing an individual or contracting with a vendor, UW Medicine screens the individual or organization against the applicable federal exclusion list(s), including:
   - Department of Health and Human Services Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE); and
   - U.S. General Service Administration (GSA) System for Award Management (SAM).

II. Ongoing Screening

A. Subsequent to initial hiring, privileging/credentialing or contracting, exclusion screening is completed against the OIG and GSA exclusion lists: at the following intervals:
   - Workforce members are screened monthly.
   - Vendors are screened on a regular basis, and no less than semi-annually.
   - Vendors determined to be a First Tier, Downstream or Related Entity (FDR) are screened monthly.

III. Notification Responsibilities

A. UW Medicine includes language in its contracts that require vendors to comply with the law to disclose information regarding exclusions from federal healthcare programs.

B. It is the responsibility of each workforce member and vendor to provide immediate notice to UW Medicine upon being (A) excluded, debarred, suspended or otherwise declared ineligible to participate in federal or state healthcare programs or contracts; (B) convicted of a criminal offense as defined by 42 U.S.C. § 1320a-7(a).

C. UW Medicine will notify health plan partners when sanctions or exclusions are discovered, within timelines indicated in the delegated service agreement.

IV. Exclusions

A. If a workforce member or vendor has been excluded, debarred, suspended or otherwise declared ineligible to participate in federal healthcare programs or contracts or found to be convicted of a criminal offense as defined by 42 U.S.C. § 1320a-7(a), the appropriate UW Medicine departments are notified for further review and action, as needed. Actions may include the following:
   - Immediate removal of the workforce member or vendor from direct or indirect responsibility for, or involvement in, any federal or state-funded healthcare program until (a) the issue is resolved and (b) it is determined the individual or vendor is not

2 42 U.S.C. § 1320a-7(a) - Exclusion of certain individuals and entities from participation in Medicare and State healthcare programs
excluded, debarred, suspended or otherwise ineligible to participate in federal or state healthcare programs;

- Repayment of claims for services in which the excluded individual, to include workforce members, or vendor, participated;¹
- Suspension of privileges or termination of the workforce member consistent with the terms and conditions of employment and/or the privileging relationship; and/or
- Termination of the contract with the workforce member or vendor.

V. Document Retention

Appropriate documentation is maintained for the screening process and findings by the UW Medicine departments and operational units that perform exclusion screening for a period of 10 years per the UW Medicine Records Retention Schedule.

REGULATORY/LEGISLATION/REFERENCES


PROCEDURE ADDENDUM(s) REFERENCES/LINKS

- UW Medicine Compliance Glossary.
- UWMC 75-18/HMC, Vendor Screening for Suppliers Including Consultants.
- ALNW, Pre-hire Background Checks.
- VMC, Vendor Credentialing.
- UWNC, Compl007 Employee Background Investigations and Sanction Screening.
- UWNC, Compl014 Vendor Screening.
- UW Medicine Records Retention Schedule

¹ For the purpose of this policy, “participated” means ordered, referred, provided or supported the service.
APPROVALS

/s/ Beth DeLair  ___________________________  11/30/2020  
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Associate Vice President for Medical Affairs, UW  

Date