

G. Monitoring Exclusionary Databases

This policy applies to all UBMD practice plans who bill government programs including, without limitation, Medicare and Medicaid. Federal and state governments require healthcare providers to check the names of all providers, staff and agents/vendors against exclusionary databases. It is required that each UBMD practice plan check the following exclusionary databases (“Exclusionary Databases”) according to the time frames listed below:

1. U.S. Office of Inspector General’s List of Excluded Individuals and Entities (“OIG-LEIE”)
2. U.S. General Services Administration’s System for Award Management (“GSA-SAM”) (Formerly known as the Excluded Parties List System)
3. New York State Office of the Medicaid Inspector General List of Restricted and Excluded Providers (“OMIG List”)
4. U.S. Treasury’s Office of Foreign Assets Control Specially Designated nationals (“SDN List”)
5. U.S. Centers for Medicare and Medicaid Services National Plan and Provider Enumeration System (“NPPES”)
6. U.S. Social Security Death Master File (“Death Master”).

The following Exclusionary Databases **must be checked monthly**:

- OIG-LEIE
- GSA-SAM
- OMIG List

The following Exclusionary Databases must be checked against providers only **when a provider is credentialed or re-credentialed**:

- SDN List
- NPPES
- Death Master

If a match is found on any exclusionary database, the provider, staff member or agent/vendor should be immediately suspended. That person should be given the opportunity to appeal to the appropriate government agency to have his or her name removed from the Exclusionary Database or receive a waiver from the appropriate government agency.

If those actions are not successful – provider or staff member must be terminated from employment and the contract with the agent/vendor must be terminated.

