Participation in Federal Programs Verification Requirement

Provider Requirements for New and Existing Provider Staff for Monthly Verifications and Attestation Submissions:

Provider office(s) are required to conduct and review the Medi-Cal Suspended & Ineligible, Office of the Inspector General (OIG), and System for Award Management (SAM) list of Excluded Individuals and Entities (LEIE list) prior to the hiring, employing, or contracting of any new, temporary, volunteer employee(s), and/or consultants, and monthly thereafter, to ensure that none of these persons or entities are excluded or become excluded from participation in federal programs.

- Provider office(s) must provide evidence of new provider office staff are pre-screened prior to hire and monthly thereafter.
- Providers are required to conduct monthly database searches for all provider office staff.
- A signed monthly attestation (attached) is required to confirm that the search has been conducted and reviewed.

The monthly attestation must be submitted to your contracted Independent Physician Associations (IPA) via fax (714) 947-8708 by the end of each month. Below are the required links for each of the verification websites and “How to Guide: Participation in Federal Program Verification” to assist in accessing, verifying, and obtaining the information.

**Medi-Cal Suspended & Ineligible List**

[https://files.medi-cal.ca.gov/pubsdoco/SandILanding.asp](https://files.medi-cal.ca.gov/pubsdoco/SandILanding.asp)

**HHS OIG (Inspector General's Office in the Federal Government)** dedicated to combating fraud, waste and abuse and to improving the efficiency of HHS programs.

[https://exclusions.oig.hhs.gov/](https://exclusions.oig.hhs.gov/)

**SAM (System for Award Management)** registration helps to streamline the acquisition of grant, loans, contracts and intergovernmental transactions. According to the General Services Administration (GSA), the federal government plans on integrating ten (10) different federal procurement systems and the Catalog of Federal Domestic Assistance into a single, streamlined system that uses the Integrated Award Environment (IAE).

How to Guide: Participation in Federal Programs Verification

Medi-Cal Suspended & Ineligible List

1. Access the Medi-Cal Suspended & Ineligible list via the link below:
   
   ![Link Image]

   https://files.medi-cal.ca.gov/pubsdoco/SandILanding.asp

   **Suspended and Ineligible Provider List**

   Medi-Cal, Health and Nursing Code (W&H Code), sections 14035.5 and 14122, mandates that the Department of Health Care Services (DHCS) suspend a Medi-Cal provider of health care services (provider) from participation in the Medi-Cal program when the individual or entity has:

   - Been convicted of a felony;
   - Been convicted of a misdemeanor involving fraud, abuse of the Medi-Cal program or any patient, or otherwise substantially related to the qualifications, functions, or duties of a provider of service;
   - Been suspended from the federal Medicare or Medi-Cal program for any reason;
   - Lost or surrendered a license, certificate, or approval to provide health care; or
   - Reached a contractual agreement with the Department that explicitly specifies inclusion on this list as a consequence of the breach.

   **Suspension of Enrollment, Suspension, or Ineligibility of Providers:**

   Suspension is automatic when any of the above criteria exist, and suspended Medi-Cal providers will not be entitled to a hearing under the California Administrative Procedures Act.

   In accordance with W&H Code, section 14035.5, subdivision (g), a provider of health care services shall be subject to suspension if claims for payment are submitted under any provider number used by the provider to obtain reimbursement from the Medi-Cal program for the services, goods, supplies, or medical equipment provided, directly or indirectly, to a Medi-Cal beneficiary, by an individual or entity that is suspended, excluded, or otherwise ineligible because of a sanction to receive, directly or indirectly, reimbursement from the Medi-Cal program and the individual or entity is listed in the Medi-Cal Suspension or Ineligibility List (SIL) established by DHCS. Currently suspended and otherwise ineligible providers, or any list prepared by the federal Office of Inspector General regarding the suspension or exclusion of individuals or entities from the federal programs. Examples of providers who need to be aware of the provisions of this law, and could be suspended if violating the law are:

   1. Billing services that submit claims for Medi-Cal patients who are suspended;
   2. Physicians that bill enrollees and bill for services performed by an ineligible provider;
   3. Providers who file for services under another provider's identification of a provider who is suspended;
   4. Providers who submit claims for the services of an ineligible provider; or
   5. Any individual or entity that is authorizing a submission or is in a submission or is one is a suspended provider.

   **Enrolled the SIL List:**

   Always verify the SIL list when submitting health claims. Eligibility and enrollment must be verified through the Health and Human Services (HHS) Federal Office of Inspector General (OIG) List of Excluded Individuals/Organizations. Cross-referencing both lists is recommended to help identify providers who are not authorized to practice or are not enrolled in the state's Medi-Cal program. Federal regulations prohibit providers who are listed in the DHS List from enrolling in the state's Medi-Cal program. Federal regulations are not included on the state's SIL list. Federal regulations that may be imposed include temporary suspensions, referrals of payments, and disclosures.

2. [Click] on the MEDI-CAL SUSPENDED AND INELIGIBLE PROVIDER LIST.

4. An Excel Spreadsheet will populate. PLEASE DO NOT print this file is very large and will slow down your computer system.

5. [Search] the list by FULL LEGAL NAMES OF YOUR EMPLOYEES/CONTRACTORS and any other name employee may use.

6. The attached attestation form will need to be completed accordingly and provided back to your contracted IPA(s).

7. A copy of your attestations should be kept for your records and be readily available, if requested by the IPA or Health Plan.

8. Please fax the attestation to (714) 947-8708.
HHS OIG (Inspector General's Office in the Federal Government)

1. Access the HHS OIG (Inspector General's Office in the Federal Government) database via the link below:

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

2. [Search] FULL LEGAL NAMES OF YOUR EMPLOYEES/CONTRACTORS
   *Note, if employee and/or new hire go by another name, a search will need to be conducted using their alias or “aka”.

3. The attestation will need to be completed accordingly and provided back to your contracted IPA(s).

   EXMAPLE:
4. A copy of your attestations should be kept for your records and be readily available, if requested by the IPA or Health Plan.

5. Please fax the attestation to (714) 947-8708.

System for Award Management (SAM)

1. Access the HHS OIG (Inspector General's Office in the Federal Government) database via the link below to the Advances Search-Exclusion:


2. [Type] FULL LEGAL NAMES OF YOUR EMPLOYEES/CONTRACTORS ‘Name’ field.

3. [Click] the ‘Search’ button.

Exclusion Search Tips

- There may be instances when a Firm or Individual has the same name, or a similar name, as your search criteria but is actually a different party. Read the entire record to understand why the entity was excluded and what effect this exclusion has on your decision.
To verify a potential match or obtain additional information, contact the federal agency that created the exclusion record. Contact information for the designated Agency Point of Contact (POC) is linked to the Excluding Agency name within the record. You can also navigate to the Agency Exclusion POC page within SAM Help under Exclusions Information.

SAM does not have DUNA number or CAGE code identifiers for all Firm exclusions records. Therefore, a search by one of these fields alone may not be sufficient. Conduct an additional Name search is no results are found by the entity identifier.

If you search only on a particular classification type (e.g. Firm), you are potentially excluding exclusion records created under a different classification.

4. Search Results will display on the bottom of the screen:

5. A copy of your attestations should be kept for your records and be readily available, if requested by the IPA or Health Plan.

6. Please fax the attestation to (714) 947-8708.

Please contact Provider Relations should you have any questions at 714-947-8600.
OIG/SAM/Medi-Cal Exclusions Screening Attestation

As a first-tier, downstream or related entity that participates in one or more governmental funded health care program, the organization identified in the signature block below attests to the following.

- That we review the Office of the Inspector General (OIG) and General Services Administration System for Award Management (SAM) exclusion lists and Medi-Cal Suspended and Ineligible Provider List upon initial hire/contract and monthly thereafter to ensure that any new employee, manager or downstream entity is not included in any such list.

- If an employee, manager or downstream entity is on such lists, the organization will terminate such person or entity and notify PMD or PMG of the person or entity's identity.

- Your organization will retain and furnish confirmation upon request documentation that your organization reviews the OIG/GSA exclusion lists upon initial hire/contract and monthly thereafter.

- Database (site listed below) verification is a mandatory monthly requirement and must be completed on or before the end of each month. Please attest below and fax completed attestation to (714) 947-8708.

The How To: Participation in Federal Programs Verification and Attestation can be found on our website at www.healthsmartmso.com.

Please be advised that pursuant to the terms of your agreement with Associated Dignity Medical Group, Inc., Associated Dignity Medical Group, Inc. or an affiliated entity, you are required to comply with all applicable federal, state, and municipal rules and regulations and that this request is directly related to such provision. Please also be advised that such screenings are required under the contract between Associated Dignity Medical Group, Inc., or an affiliated entity, on the one hand, and the health plan, on the other hand.

To assist you with the implementation of your OIG/GSA Exclusion process, we are providing links to the relevant exclusions lists to comply with the regulations:

- System for Award Management (SAM)- https://sam.gov/SAM/pages/public/searchRecords/advancedPIRSearch.jsf

Please note that these three lists do not necessarily overlap and all three lists must be checked as to each employee, manager or downstream entity. For example, an employee could be listed on the Medi-Cal exclusion list but not listed on the OIG and/or SAM exclusion lists.

Print Name: ___________________________ Name of Organization: ___________________________
Signature: ___________________________ Date Signed: ___________ National Provider: ___________________________

*As a reminder, a monthly attestation for must be conducted and submitted. Please Fax Attestation to (714) 947-8708

We thank you for your continued support and providing quality care to the members.

Associated Dignity Medical Group, Inc.