

**MONTGOMERY COUNTY
CORPORATE COMPLIANCE**

EXCLUDED PROVIDER CHECKS POLICY

Date Drafted: 09/10/2010

Date Approved: 09/28/2010

Date(s) Revised: 05/05/2011; 10/4/11

I. POLICY:

It is the policy of Montgomery County to check, on a monthly basis, all of its relevant contracted Independent Providers, contracted Agency Provider Entities as well as Agency staff, contractors and subcontractors, employees that are paid with Medicaid Funds and Physicians ordering Medicaid Services against the applicable Federal and New York State (NYS) Medicaid exclusion lists. The County shall additionally require all contracted Agency Provider Entities to run the same exclusion list checks on their relevant employees and contracted providers.

II. METHOD:

1. The County shall utilize a data program for the purpose of completing checks of the stated persons/entities against the appropriate Federal and NYS exclusion lists.
2. Department Heads, with identified relevant employees, will designate and assign staff as to how their department shall prepare the data submission in accordance with County prescribed frequency and the data program instructions.

III. FREQUENCY:

1. Designated staff from each department shall prepare and submit an initial roster of relevant department contracted Independent Providers, contracted Agency Provider Entities including Agency staff, contractors and subcontractors, employees and ordering Physicians via the data program.
2. On a monthly basis thereafter, designated staff shall prepare and submit additional rosters of any new relevant contracted Independent Providers, contracted Agency Provider Entities including Agency staff, contractors and subcontractors, employees and ordering Physicians via the data program, for checking against the appropriate Federal and NYS Medicaid exclusion lists. Agencies are required to notify the County of any changes in Agency staff, contractors or subcontractors as they occur but no later than with the monthly billing. Agencies will complete a monthly log of any changes to staff, contractors and subcontractors or will note that there were no changes and attach the log with the monthly billing. County staff will update Agency lists per the monthly information provided by Agencies.
3. Also, on a monthly basis, staff shall also review the data program findings for any names that are identified against any of the applicable Medicaid exclusion lists.

4. Staff shall follow the data program instructions to reconcile and resolve any names identified as appearing on any of the applicable Medicaid exclusion lists.
5. On an as needed basis, and as directed by the Department Head, the staff shall submit the names of potential contracted Independent Providers, contracted Agency Provider Entities including Agency staff, contractors and subcontractors, employees and/or ordering Physicians to be checked against the appropriate Federal and NYS Medicaid exclusion lists.

IV. REPORT OF FINDINGS:

1. The staff shall report to their immediate Supervisor any names identified and verified as matching any of the appropriate Federal and NYS Medicaid exclusion lists.
2. The Supervisor shall report such findings to the Department Head.
3. All Employees, Agency and/or Independent contractors identified, as being on the excluded list will be reported to OMIG immediately.

V. RESOLUTION OF FINDINGS:

1. The Department Head shall take the appropriate action, per county policy, applicable State and Federal Laws and applicable collective union bargaining agreements.