

TUSCARAWAS COUNTY GENERAL HEALTH DISTRICT

Employee, Board and Contractor Exclusion Screening

This policy applies to all Tuscarawas County Health Department (TCHD) employees, including trainees, volunteers, contractors, subcontractors, providers, and Board Members.

TCHD is committed to maintaining quality care and service as well as integrity in its financial and business operations. Therefore, TCHD will conduct appropriate screening of all persons listed above to ensure that they have not been excluded by federal or state law enforcement, regulatory or licensing agency to provide service to and/or for the Tuscarawas County Health Department.

It is policy if TCHD 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. TCHD will conduct annual screening of all current employees, contractors or Board Members and complete screening prior to employment of all potential employees, contractors, or Board Members. This screening will be conducted by the administrative assistant and any flagged persons will be reported immediately to the Health Commissioner/Executive Director.

Procedure:

1. TCHD's administrative assistant will conduct exclusion checks to verify that all employees, contractors and Board members have not been excluded from federal and/or state and local healthcare programs. An exclusion check is a search of the following to determine if the individual appears on any of the following lists:
 - U.S. Department of Health and Human Services, Office of Inspector General (OIG)'s list of excluded individuals and entities available at <http://oig.hhs.gov/fraud/exclusions/html>



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- The General Services Administration (GSA)'s Excluded Parties List available at <http://www.epls.gov/>
 - Sex Offender Registry available at <http://odrc.drc.ohio.gov/OffenderSearch/Search.aspx>
 - Nurse Aide Registry available at <http://www.odh.ohio.gov/odhPrograms/io/nurseaide/nurseAide1.aspx>
 - DODD Abuser Registry available at https://its.prodapps.dodd.ohio.gov/ABR_Default.aspx
 - SAM Registry available at http://www.federalcontractorregistry.com/?utm_source=msn&utm_medium=cpc&utm_campaign=SAM%20Registration&utm_term=%20register%20in%20%20sam&utm_content=C
2. Exclusion checks will also be performed on all applicants for employment as part of the 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. Exclusion checks will also be performed for all potential Board members. If the exclusion check indicates that any individual has been excluded from federal healthcare programs, the individual will not be considered for Board affiliation.
 4. The administrative assistant will also conduct exclusion list screenings for all independent contractors, prior to Board of Health approval of the contract. Should the exclusion list indicate that a contractor has been excluded, the contract will not be executed.
 5. It will be the responsibility to the administrative assistant to ensure that exclusion checks of all employees are conducted at least annually. If the exclusion list indicates that an individual has been excluded from federal healthcare programs the individual cannot continue to be employed by TCHD. The Board of Health will initiate the process for termination dependent on the classification status of the employee.
 6. Annual audits of all contracted individuals and board members will also be conducted by the administrative assistant.
 7. Any excluded individual will be reported immediately to the Health Commissioner/Executive Director who will notify the Board of Health.

Revisions

Date	Revision	Person Responsible
August 2016	Created	Health Commissioner
April 12, 2017	Formatting	Health Commissioner
May 10, 2017	Approved	Board of Health