

SECTION: OPERATIONS

TITLE: EXCLUSION SCREENING

ADOPTED:

REVISED: October 17, 2016

EPHRATA AREA SCHOOL DISTRICT

829. EXCLUSION SCREENING	
1. Purpose	<p>Ephrata Area School District participates in the School-Based ACCESS Program (SBAP), which is a Medical Assistance (MA) Program. Providers (Ephrata Area School District) who participate in MA Programs are required to conduct screenings to ensure that personnel who are involved directly or indirectly with providing items and services to MA recipients, and/or who are involved in generating a claim to bill for services, have not had their MA participation terminated or precluded. Providers must also screen all vendors/contractors and service providers who provide items and/or services or who are otherwise involved in generating a claim to bill such services.</p> <p>The district shall appropriately screen all personnel, vendors, contractors, and service providers whose functions are a necessary component of providing items and services to MA recipients and/or who are involved in generating any claim to bill for services.</p>
2. Authority	<p>In accordance with applicable laws, regulations and compliance program requirements, the district will make reasonable and prudent efforts to screen individuals and entities as appropriate and not to submit any claim for services ordered or rendered by an individual or entity that has been excluded from or is ineligible to participate in state or federal health care programs.</p>
3. Delegation of Responsibility	<p>The Superintendent or designee shall be responsible for the coordination, compilation, and preparation of all information necessary to implement this policy in accordance with district administrative regulations.</p>
4. Guidelines	<p><u>Personnel And Entities</u></p> <p>The district will screen all existing personnel and new employees whose responsibilities include providing services subject to this policy. The district will also screen all vendors, contractors, and service providers subject to this policy, on an ongoing basis, to ensure that such entities are not ineligible.</p>

Screening will be conducted for the following specific groups, and may be extended to other individuals and entities at the sole discretion of the district to ensure full compliance with all legal requirements:

1. SBAP direct service staff, supervisory staff, billing staff, and transportation staff.
2. Personnel who sign Individual Education Plans (IEPs) or have any association with the SBAP either directly or indirectly.
3. Personnel who sign documentation logs for MA services.
4. Vendors, such as durable medical equipment suppliers that are used to purchase assistive devices for SBAP students.
5. Contracted vendors related to SBAP services.

Responsible Parties And Frequency

Responsibility for screening will be as follows:

1. New Hires – Human Resources Department.
2. Existing Employees – Business Services Department (ACCESS Coordinator).
3. Vendors/Contractors – Business Services Department (Contract Compliance, ACCESS Coordinator).

In addition to initial screenings, personnel and entities subject to this policy will be screened on a monthly basis to capture exclusions and reinstatements that have occurred since the last screening.

All district personnel subject to this policy shall be advised of their obligation to immediately disclose to the appropriate department contact their status as an ineligible person and/or whether s/he has been charged with an offense of the type that would make the individual ineligible if convicted.

Should the district become aware of an employee, vendor, contractor, or service provider that has been debarred, suspended, or excluded, or if it is determined that there is any pending action against any employee or entity related to proposed debarment, suspension, or exclusion, the district shall immediately prevent any further involvement by such employee or entity in any state or federal health care program.

Screening Databases

The district shall utilize the following databases in order to conduct the screening process:

1. Pennsylvania Medichcek List - Pennsylvania Department of Public Welfare.
2. List of Excluded Individuals/Entities (LEIE) - Department of Health & Human Services (HHS) & Office of Inspector General (OIG).
3. Excluded Parties List System (EPLS) - General Services Administration (GSA).

Documentation

The district will maintain appropriate documentation to support that exclusion screening has been conducted in accordance with this policy and applicable law. Documentation will be auditable and maintained for at least four (4) years.

References:

Prohibited Providers – 62 P.S. Sec. 1407(c)(2)

Department of Public Welfare Regulations – 55 PA Code Sec. 1101.42(c), 1101.68(a), 1101.77(c)

Medicaid and CHIP Payment and Access Commission – 42 U.S.C. Sec. 1396(b)(2)(A)(i),(B)

Health Care Program Integrity, Title 42, Code of Federal Regulations – 42 CFR Sec. 1001.1901(b)

MA Bulletins – DPW