	Shasta County Health and Human Services Agency Mental Health Plan	
	Federal Database Checks	No. 2023-01
		Issue Date: 05/16/2023
		Last Revised: N/A
		Page: 1 of 4
Author: Quality Management		

Purpose / Background


To communicate requirements regarding federal database checks conducted at the time of hiring and on a monthly basis afterwards, namely the Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE), Medi-Cal Suspended and Ineligible Provider List (Suspended List a.k.a. S&I List)/ System for Award Management (SAM), the Social Security Administrations Death Master File (DMF), and the National Plan and Provider Enumeration System (NPPES) for federal or state funded health care programs as well as the required steps when a provider (i.e., employee, contractor, sub-contractor, and/or vendor) is identified as an excluded entity or individual.

Definitions

List of Excluded Individuals and Entities – The LEIE established by the OIG in 1981, provides information to the health care industry, patients, and the public regarding individuals or entities currently excluded, suspended, debarred, or otherwise ineligible to participate in the Medicare, Medicaid, or other federal or state funded health care programs. Individuals and entities who have been reinstated are removed from the LEIE. The LEIE contains only exclusion actions taken by the OIG. There are many bases for exclusion, including a conviction related to the Medicare or Medicaid program, a conviction related to patient abuse, or an action taken by the state licensing authority. The LEIE only reports exclusion actions taken by the OIG and is not a clearinghouse for reporting actions taken by other agencies.

Federal Health Care Programs – Medicare, Medicaid, and all other plans and programs that provide health benefits funded directly or indirectly by the United States. The exclusion implemented prior to August 4, 1997, includes the following federal health care programs: Medicare (Title XVIII), Medicaid (Title XIX), Maternal and Child Health Services Block Grant (Title V), Block Grants to states for Social Services (Title XX), and State Children’s Health Insurance (Title XXI) programs.

Medi-Cal Suspended and Ineligible Provider List – The Suspended List is maintained by the California Department of Health Care Services (DHCS). The Suspended List includes individuals suspended from Medi-Cal participation if the individual or entity has been convicted of a felony, convicted of a misdemeanor involving fraud or abuse of the Medi-Cal program or any patient, suspended from federal Medicare or Medicaid programs, lost or surrendered a license or certificate, or breached a contractual agreement with the Department of Health Care Services (DHCS) that explicitly specified inclusion on this list as a consequence.

	Shasta County Health and Human Services Agency Mental Health Plan	
	Federal Database Checks	No. 2023-01
		Issue Date: 05/16/2023
		Last Revised: N/A
		Page: 2 of 4
Author: Quality Management		

System for Award Management – SAM is the official United States government system that consolidated the capabilities of the Central Contract Registry (CCR), Federal Agency Registration (FedReg), Online Representations and Certifications Applications (ORCA), and Excluded Parties List System (EPLS). SAM includes OIG’s exclusions but also includes debarment actions taken by federal agencies.

Death Master File (DMF) – A computer database file made available by the Social Security Administration which contains information regarding persons who had Social Security Numbers and whose deaths have been reported to the Social Security Administration.

National Provider Identifier (NPI) – The NPI is a unique 10-digit identification number issued to health care providers in the United States by the Centers for Medicare and Medicaid Services (CMS). Once assigned, a provider's NPI is permanent and remains with the provider regardless of job or location changes.

National Plan and Provider Enumeration System (NPPES) – The system developed by CMS to assign and maintain National Provider Identifier (NPI) numbers for health care providers.


Policy

All providers are screened before hiring and revalidated on a monthly basis in accordance with federal regulations regarding provider screening and enrollment and disclosure of information (42 CFR 455, parts B and E, 42 CFR §438.602(b)).

Sanctions/Exclusions

An exclusion on LEIE/Suspended List/SAM will result in no payment made by Shasta County for any federal or state health care funded program for any items or services furnished, ordered, or prescribed by an excluded individual or entity. The payment prohibition applies to the excluded person, anyone who employees or contracts with the excluded person, and any hospital or other provider where the excluded person provides services. The exclusion applies regardless of who submits the claims and applies to all clinical, administrative and management services furnished by the excluded person/ entity.

Note: Exclusions affect only the ability to claim payment from the above programs for items and services rendered. It does not affect the ability of any individual to receive Medicare or Medicaid benefits under these programs.

	Shasta County Health and Human Services Agency Mental Health Plan	
	Federal Database Checks	No. 2023-01
		Issue Date: 05/16/2023
		Last Revised: N/A
		Page: 3 of 4
Author: Quality Management		

Individuals employed by Shasta County Health and Human Services (HHS) or current contracted providers and/or vendors who become designated as an Excluded Individual/Entity on LEIE/Suspended List/SAM or are charged with criminal conduct that could lead to exclusion from participation in federal health care programs shall be immediately removed from responsibility for or involvement with Mental Health Plan (MHP) operations funded by any federal or state health care programs until such time as the person or entity is reinstated or cleared of all charges.

Further, the MHP will not hire or contract with any individuals or entity under sanction or exclusion on LEIE/Suspended List/SAM or any other authorized law enforcement, regulatory, or licensing agency. The MHP will not certify or pay any excluded provider with Medi-Cal funds, and any such inappropriate payments or overpayments are subject to recovery and/or be the basis for other sanctions by the appropriate authority.

NPPES


At the time of hiring/contracting, the MHP will check the NPPES for active National Provider Identifier for all new providers (i.e., employees, network providers, subcontractors, persons with ownership of control interest, and managing employee/agent of the MHP).

Death Master File

At the time of hiring/contracting, the MHP will check the Social Security Death Master File to ensure that no new providers have a reported death on the public file.

Excluded Providers

If the MHP finds an individual who is excluded, it will promptly notify DHCS. The MHP will not certify or pay any excluded provider with Medi-Cal funds, and any such inappropriate payments or overpayments may be subject to recovery and/or be the basis for other sanctions by the appropriate authority.

	Shasta County Health and Human Services Agency Mental Health Plan	
	Federal Database Checks	No. 2023-01
		Issue Date: 05/16/2023
		Last Revised: N/A
		Page: 4 of 4
Author: Quality Management		

Questions / Information

Employees, contractors, and/or subcontractors who have questions or wish to contest the information contained in the LEIE may contact the OIG Exclusion Staff at:

Mail: HHS, OIG, OI
 Attn: Exclusions
 PO Box 23871
 Washington DC 20026
 Phone: 202-691-2311
 Fax: 202-691-2298
 E-mail: sanction@oig.hhs.gov

References

42 Code of Federal Regulations § 1001.2001-1001.2007
 42 Code of Federal Regulations § 455, parts B and E
 42 Code of Federal Regulations § 455.436
 42 Code of Federal Regulations § 438.608
 Social Security Act, § 1128 and 1156
 MHP Agreement, Exhibit A, Attachment 13

Authorization

The above policy has been reviewed and is authorized for immediate implementation:

DocuSigned by:

 12357C50B45D437...
 Miguel Rodriguez, LCSW, Mental Health Director
 Behavioral Health & Social Services
 Shasta County Health & Human Services Agency

06/02/2023 | 11:44 AM PDT

Date

DocuSigned by:

 9C6EB7A504F94B9...
 Christy Coleman, Compliance Officer
 Administration, Assistant Director
 Shasta County Health & Human Services Agency

06/04/2023 | 5:38 PM PDT

Date