



Corporate Procedure

Subject:	Sanction Check Search Process		
Procedure No:	700.002	Created Date:	3/1/2013
Authorized By:	President/CEO	Review Date:	5/10/2019
Department:	People & Culture	Effective Date:	7/8/2019

PURPOSE: To outline a process in order to comply with statutory enactments that have strengthened and expanded the OIG's authority to exclude individuals and entities from participation in Medicare, Medicaid and other Federal health care programs; MTM will be required to perform the following monthly Sanction Checks on all current employees:

- Office of Inspector General's (OIG) List of Excluded Individuals/Entities;
- SAM Federal System for Awards Management (formerly known as EPLS)
- State specific Medicaid exclusions databases where available

RESPONSIBILITY:

The delegated People & Culture (P&C) representative will do the following:

1. Run Current Employee Report through HRIS
2. Ensure report includes: Last Name, First Name, Middle Initial, DOB, SS#, work and home address
3. Save file in Excel or Txt format prior to submitting to the appropriate Vendor
4. Log into the Vendor website and upload file
 - Employee list should be sent by the 3rd of every month.
 - MTM-P&C Department will receive Exclusion List (if there are any red flagged employees) within 72 hours of submitting
 - Reason for exclusion, sanctions or debarment

If exclusion is found to be accurate, employee may receive disciplinary actions; up to and including termination.

- All submissions will remain as historical activity and MTM will have the ability to run statistical analysis through the vendor web portal.
- Once received, HR Department will store the Sanction Check report (monthly) on HR's secure, internal Shared Drive.
- All Results will be in PDF Format.
- HR Department will provide notification of any positive/accurate results to the appropriate MTM department to allow them to notify any needed Client.

This procedure is reviewed on an annual basis for appropriateness and effectiveness.

MTM Proprietary Document

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