

Screening for Excluded Individuals Frequently Asked Questions

WHY do we have to screen for excluded individuals?

Federal regulations (42 CFR §§ 1001-1002) prohibit payment for items or services furnished by excluded individuals and entities. It is imperative that this first line of defense in combating fraud and abuse be conducted accurately, thoroughly, and routinely.

Who must be screened?

The Office of Inspector General recommends that to determine which persons should be screened, review each job category or contractual relationship to determine whether the item or service being provided is directly or indirectly, in whole or in part, payable by a Federal health care program. If the answer is yes, then it is best to screen all persons that perform under that job category or contract.

Examples: Grantee, employees of grantee, vendor, employees of vendor, volunteers, drivers, dispatchers, claim processors, administrative employees, clerks, management.

How often must we screen for excluded individuals?

Prior to employing or contracting and thereafter, monthly. (DHMH Transmittal #73)

What do we do if we identify a positive match?

If a positive match is identified, immediately contact your Non-Emergency Medical Transportation Grantee and inform them of your finding. They will document your finding and forward the information to the Maryland Department of Health and Mental Hygiene Transportation Grant Program for follow-up and further direction.

What do we do if we do not identify a positive match?

If a positive match is not identified, submit the completed attestation indicating your finding to your Non-Emergency Medical Transportation Grantee.

How do we determine if a person or entity is excluded?

It is recommended that the following databases be used to determine if a person or entity is excluded:

- Social Security Administration's Death Master File (<http://www.ntis.gov/products/ssa-dmf.aspx>);
- The National Plan and Provider Enumeration System (NPPES) (<https://nppes.cms.hhs.gov/NPPES/Welcome.do>);
- The List of Excluded Individuals/Entities (LEIE) (http://oig.hhs.gov/exclusions/exclusions_list.asp);
- System for Award Management (SAM) (<https://www.sam.gov/portal/public/SAM/>);
- DHMH Sanctioned Providers and Entities Excluded from Participation in Maryland Medicaid Program Database (<http://dhmh.maryland.gov/oig/SitePages/related-links.aspx>);
- Maryland Department of Motor Vehicles; and
- Any such other databases as the Department of Health and Mental Hygiene may prescribe.

Who do we contact for further information?

If you have additional questions, please contact Lisa N. Fassett, Maryland Department of Health and Mental Hygiene Transportation Grant Program at 410-767-1739 or lisa.fassett@maryland.gov.