Exclusion Screening Requirements

Federal law prohibits payment to a person or entity excluded from federal healthcare programs. To ensure no payment is made to an excluded party, individuals and entities involved in IPA business must be screened regularly against federal databases of excluded parties.

Who must be screened? All employees, temporary employees, volunteers, consultants, governing body members, and subcontractors involved in IPA business (such as a third-party biller).

When and how often? Screenings are required prior to hire or contracting, and monthly thereafter.

What if there's a match? All potential matches must be investigated, and the outcome of the investigation must be documented.

False match:

- Document that the match is false. This can be as simple as a note on the screening results that says "false match."
- Save the source documentation, such as a screenshot, that shows the person or entity name, the date, the source, and the information that proves that the match is false.

Confirmed match:

- Immediately remove the person or entity from direct or indirect work supporting IPA business
- Notify Physicians DataTrust at compliance@pdtrust.com, or by phone at (562) 860-8771, ext. 114

What documentation is required? Screening evidence must show the name of the person or entity being screened, the date, the exclusion database checked, the screening results, and the outcome of having investigated any potential matches.

If your organization uses a third-party vendor to conduct screenings, screening evidence must also show the name of the vendor.

Evidence of screenings and resolving potential matches must be saved for a minimum of ten (10) years.

Who do I contact with questions? For assistance with exclusion screenings, please contact Physicians DataTrust at compliance@pdtrust.com or by phone at (562) 860-8771, ext. 114.

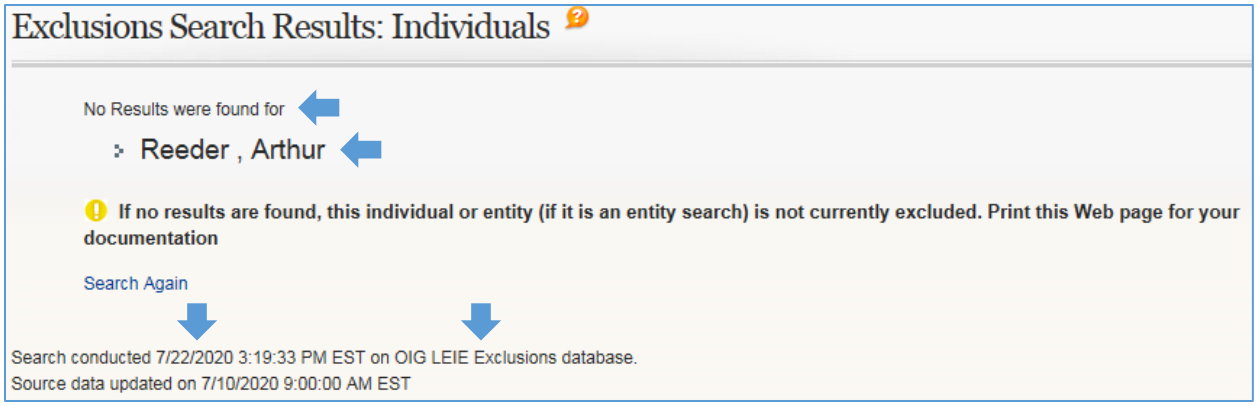
OIG Exclusion Screenings

The first database is the Department of Health and Human Services (DHHS) Office of the Inspector General (OIG) List of Excluded Individuals and Entities (LEIE). This database lists individuals and entities excluded from participation in government healthcare programs.

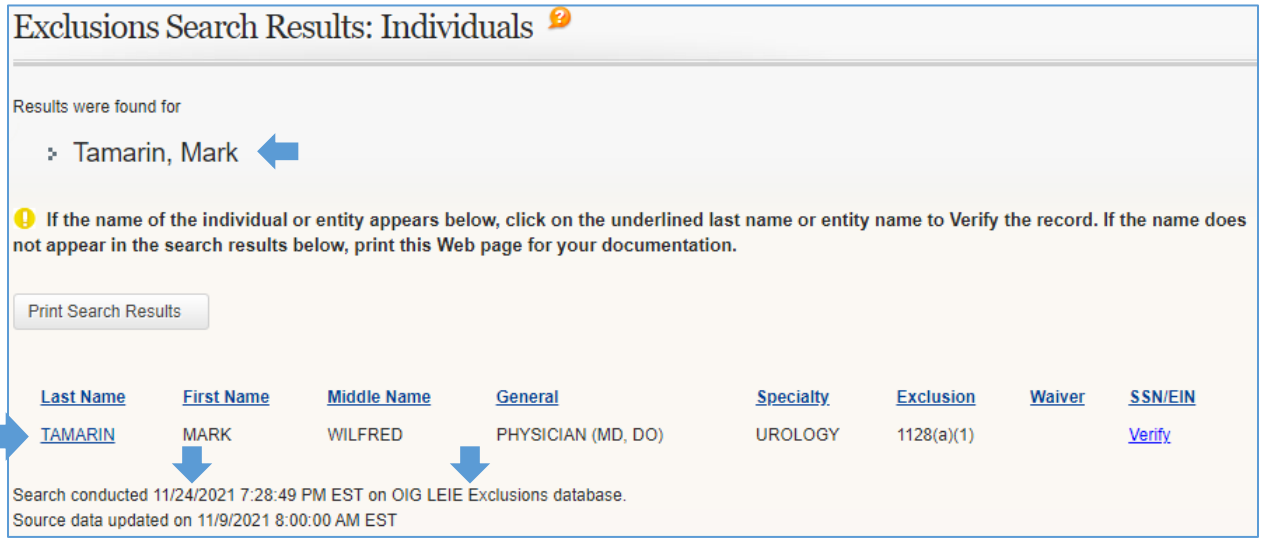
To conduct OIG exclusion screenings:

- Navigate to https://exclusions.oig.hhs.gov/
- Select the search type (Individual, Multiple Individuals, Entity, Multiple Entities)
- Enter the individual or entity name and click "Search"
- Save a screenshot of the results, or print the results page to PDF
- Ensure the name, screening date, database name, and screening results are visible
- Save this documentation for a minimum of ten (10) years

No matches found:

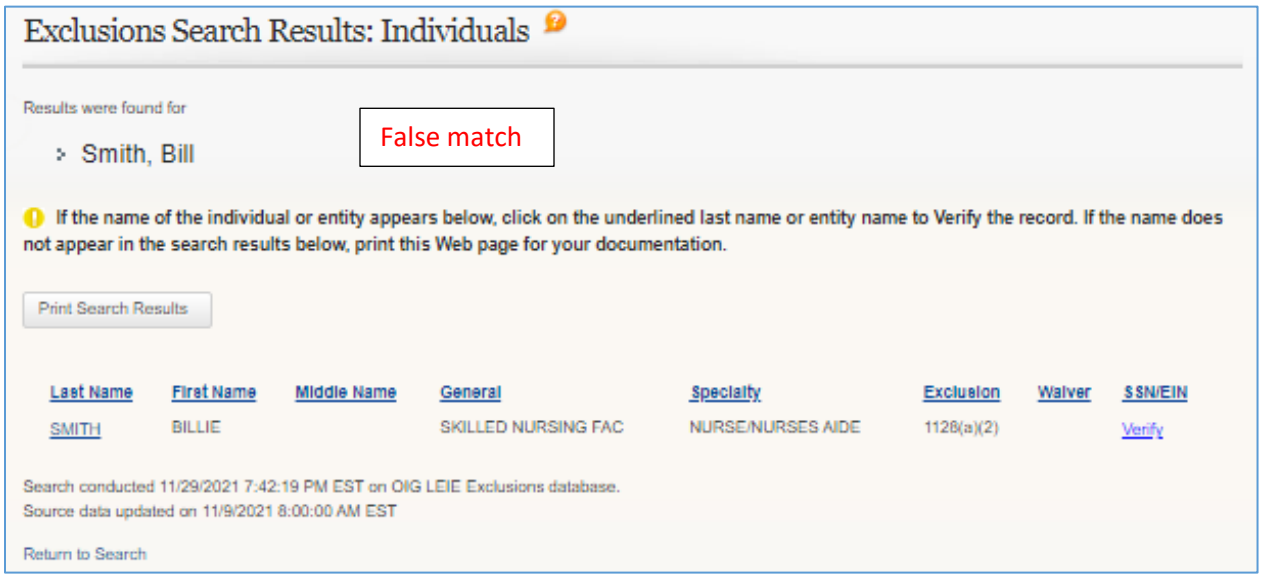


Potential match found:

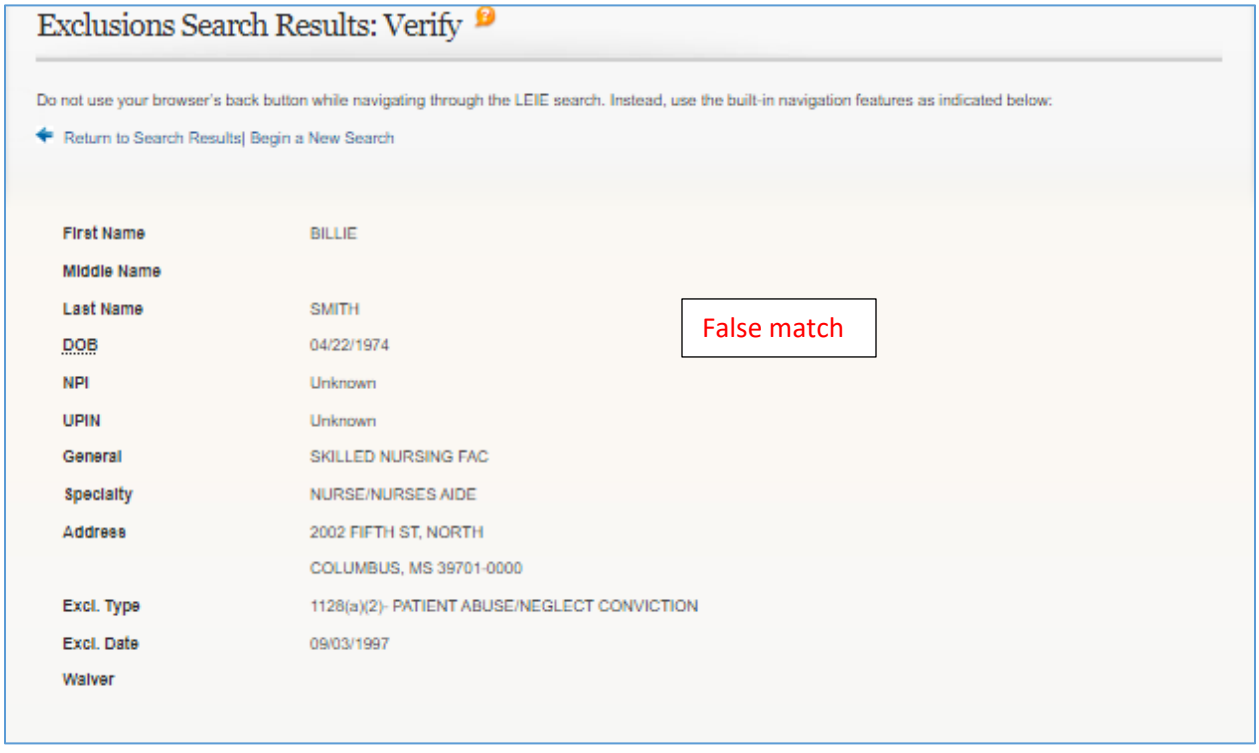


To investigate potential matches:

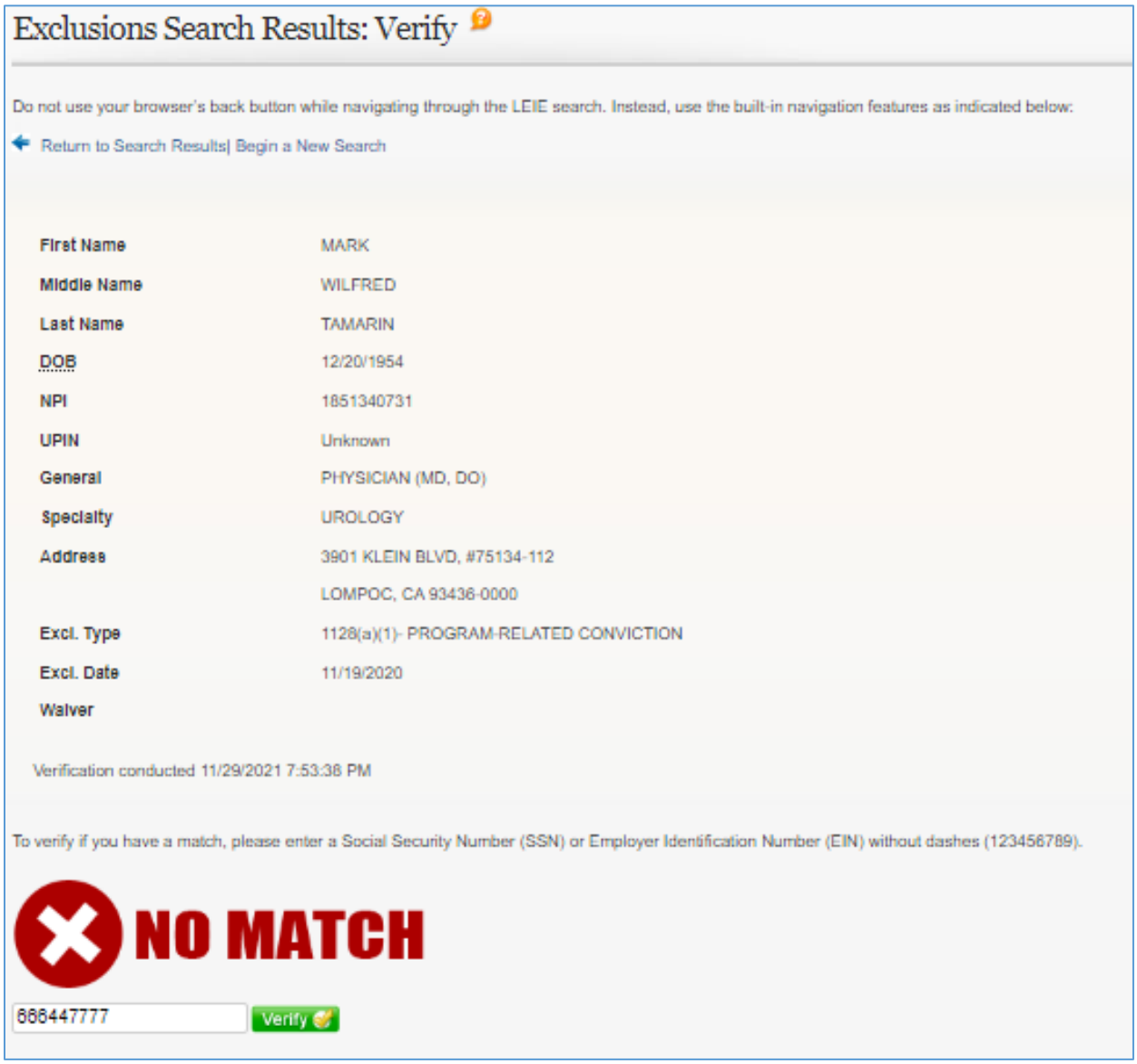
- If the party's name does not appear in the search results, note "false match"
- Save this documentation for a minimum of ten (10) years



- If the party's name appears in the search results, click "Verify"
- If the information displayed disproves the match, note "false match"
- Save this documentation for a minimum of ten (10) years



- If the information displayed does not disprove the match:
    a. For an individual, enter the individual's SSN
    b. For an entity, enter the entity's EIN or TIN
- If there is "NO MATCH", save this documentation for a minimum of 10 years.



- If there is a match, immediately remove the party from direct or indirect IPA business
- Save documentation of this action for a minimum of ten (10) years

For assistance determining if your employee or subcontractor matches with an excluded party, please contact Physicians DataTrust at compliance@pdtrust.com or by phone at (562) 860-8771, ext. 114.

GSA Exclusion Screenings

The second database is the General Services Administration (GSA) System for Award Management (SAM). This database lists individuals and entities excluded from participation in government contracts and subcontracts, including those government contracts and subcontracts pertaining to healthcare.

To conduct GSA exclusion screenings:

How to search for exclusions (written)

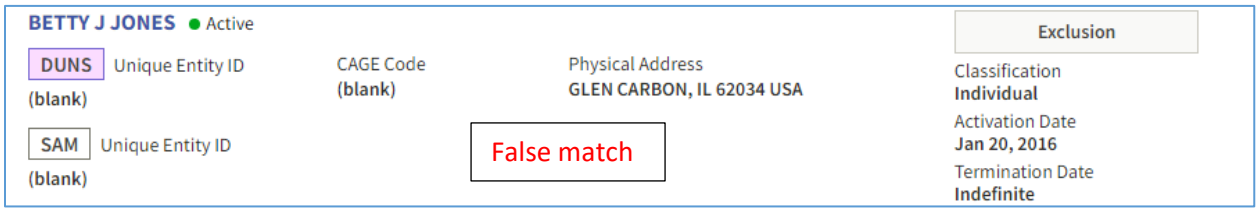
How to search for exclusions (video)

Once results are displayed,

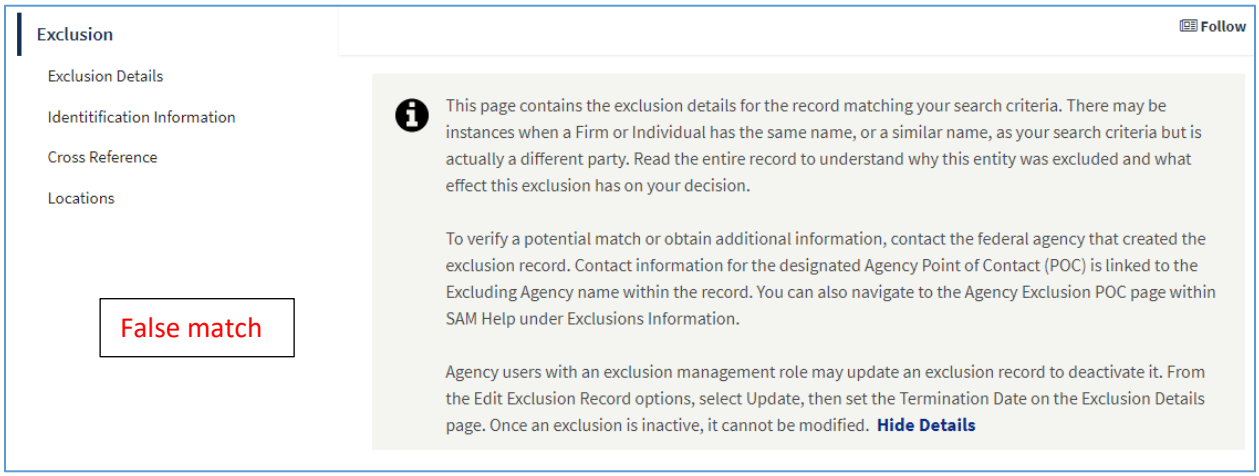
- Print the results page to PDF
  - Turn on your internet browser's "headers and footers" feature to add a date stamp
- Ensure the name, screening date, database name, and screening results are visible
- Save this documentation for a minimum of ten (10) years

To investigate potential matches:

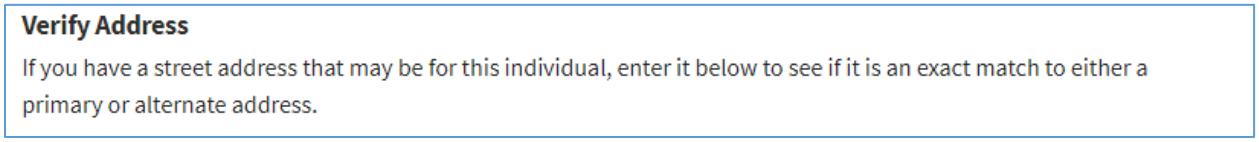
- If the information displayed disproves the match, note "false match"
- Save this documentation for a minimum of ten (10) years



- If the information displayed does not disprove the match, click the name
- If the information displayed on this screen disproves the match, note "false match"
- Save this documentation for a minimum of ten (10) years



- If the information displayed does not disprove the match, enter the party's address
- If there is "NO MATCH", save this documentation for a minimum of 10 years.



- If there is a match, immediately remove the party from direct or indirect IPA business
- Save documentation of this action for a minimum of ten (10) years

For assistance determining if your employee or subcontractor matches with an excluded party, please contact Physicians DataTrust at compliance@pdtrust.com or by phone at (562) 860-8771, ext. 114.