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**TOPIC: COMPLIANCE- EXCLUSION LISTS SCREENING**

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**PURPOSE:** To ensure that PCC Community Wellness Center does not affiliate with Ineligible Persons.

**LEVEL OF RESPONSIBILITY:**

All current and potential staff  
All current and potential Board members  
All current and potential contractors  
All current and potential vendors  
All current and potential volunteers  
Individuals or Organizations that affiliate with PCC Community Wellness Center

**POLICY:** PCC Community Wellness Center must comply with all federal and state requirements for screening of all existing and current individuals that affiliate with PCC Community Wellness Center. This includes staff, Board members, contractors, vendors and volunteers.

Definitions

**Ineligible Person-** An individual or organization who is debarred, suspended, proposed for debarment, excluded or disqualified or otherwise declared ineligible to participate in a Federal or State health care program, or may become debarred, suspended, proposed for debarment, excluded or disqualified or otherwise declared ineligible to participate in a Federal or State health care program on the basis of a criminal conviction, loss of licensure or otherwise.

**Exclusion lists- Include:**

Federal- [www.oig.hs.gov/exclusions/index.asp](http://www.oig.hs.gov/exclusions/index.asp)

Federal -[www.sam.gov](http://www.sam.gov)

State- [www.state.il.us/agency/oig/search.asp](http://www.state.il.us/agency/oig/search.asp)

**PROCEDURES:**

1. PCC Community Wellness center shall complete screening of all individuals and organizations prior to the commencement of their affiliation with PCC. PCC also shall complete screening of all individuals and organizations affiliated with PCC on a quarterly basis. As appropriate, PCC may conduct random screenings in addition to regularly scheduled screenings.
2. Screening of individuals and organizations shall be conducted by PCC's Human Resources department and the CEO's Administrative Assistants under the supervision of PCC's Director of Performance Improvement and Compliance.

3. The HR department and Administrative Assistants will notify the Director of Performance Improvement and Compliance, if any individual or organization currently or potentially affiliated with PCC is determined to be an Ineligible Person. The Director of Performance Improvement and Compliance and the President and CEO shall determine on a case-by-case basis whether PCC may begin or continue the potential affiliation.

4. The Director of Performance Improvement and Compliance shall maintain the records of all screenings for a period of six years after the termination of PCC's affiliation with the individual or organization in either a paper or electronic format.

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