



Series	Compliance	
Policy Name	Sanction Screening	
Policy Number	1503	
Origination Date	11/01/2013;	Revised: 3/8/24
Regulation	42 C.F.R. §§ 422.503(b)(4)(vi), 423.504(b)(4)(vi), CCKids Sunshine Contract (SSHP CBC – Vendor Agreement 2023 CCK)	

The Federal Sentencing Guidelines, as well as the Model Compliance Plans and Compliance Program Guidelines issued by the U.S. Department of Health and Human Services, Office of Inspector General (OIG) make it clear that organizations are responsible for who they hire, to whom they give discretionary authority, and with whom they do business.

The OIG's guidance strongly advises organizations to utilize screening mechanisms to preclude employing or engaging in business relationships with individuals and/or entities that have been convicted of criminal violations or have been the subject of a Medicaid, Medicare, or Centers for Medicare and Medicaid Services (CMS) sanction, debarment, exclusion, or other adverse action that could indicate a propensity for non-compliance with applicable laws and regulations.

Policy

Communities Connected for Kids (CCKids) will not employ or engage in a business relationship with anyone who is currently under sanction or exclusion by any duly authorized enforcement agency, or licensing and disciplining authority. This is in furtherance of the company goal of ensuring that all employees, independent contractors, or board members are properly credentialed, licensed and without a history of misconduct or performance issues. Potentially, this type of history may affect the performance of their duties on behalf of CCKids and the individuals served in a fiduciary manner.

1. As part of CCKids Risk Management Program, the employment application for all new employees includes an attestation by the candidate as to whether he/she has ever been convicted of criminal violations or been the subject of a Medicaid, Medicare, or Centers for Medicare and Medicaid Services (CMS) sanction, debarment, exclusion, or other adverse action that could indicate a propensity for non-compliance with applicable laws and regulations. All employees with discretionary authority relating to legal compliance (e.g. care coordinators, treatment professionals, and billing/accounting managers) shall be asked through the interviewing process if they have been sanctioned by a duly authorized regulatory or enforcement agency of government.
2. CCKids will take all reasonable steps to verify that the information provided is complete and accurate.
3. CCKids will screen all prospective employees, independent contractors, and other individuals as needed in compliance with signed contract requirements against the General Services Administration's List of Parties Excluded from Federal Programs and the OIG's List of Excluded Individuals/Entities.



Sanction screening is completed for every individual covered under this policy prior to the first date of employment or associated relationship with CCKids and monthly thereafter.

4. If an individual is discovered to be an excluded individual on any exclusion list, CCKids will immediately remove the excluded individual(s) from duties associated with their discretionary authority.

5. CCKids will provide immediate notification to any contract partners if such an exclusion is discovered.

Approved: DocuSigned by:
Carol Deloach
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Carol Deloach, CEO

3/13/2024