

Exclusion Screening Policy

Scope:

This policy applies to all affected individuals of the corporations comprising the YAI (Young Adult Institute) Network (herein referred to as "YAI"). Affected individuals include employees, the chief executive officer and other senior administrators, managers, trainees, volunteers, consultants, contractors, agents, subcontractors, independent contractors, and the governing bodies of the YAI Network.

Purpose:

YAI is committed to maintaining high quality care and services as well as integrity in its financial and business operations. Therefore, YAI will conduct appropriate screening to ensure that it is not employing, retaining or doing business with individuals or entities that are deemed to be "Excluded Providers."

Policy:

YAI screens all affected individuals prior to them beginning service and every 30 days thereafter to ensure that they are not excluded providers. Employee screening is done by the Human Resources department and contractor screening by the Finance department. A report of the process and results of this screening is made to the Staff Compliance Committee, and the Board (directly or through its Compliance Committee of the Board), along with any recommendations for remedial actions or improvement to the process as part of the annual compliance report.

Such screening will include a review of all required sources, including but not limited to the following:

- U.S. Department of Health and Human Services, Office of Inspector General (OIG)'s List of Excluded Individuals and Entities (LEIE) available on the website at <http://oig.hhs.gov/fraud/exclusions.html>
- The General Services Administration (GSA)'s Excluded Parties List System available on the System for Award Management's website at <http://www.sam.gov/>
- NYS Office of the Medicaid Inspector General (OMIG)'s Restricted, Terminated, or Excluded Individuals or Entities database available on the OMIG's website at <http://www.omig.ny.gov/data/content/view/72/52/>
- For NJ Employees: State of New Jersey Office of the Comptroller's Disqualified Providers database available on their website at <http://www.state.nj.us/treasury/debarred> or <http://www.njinsurancefraud.org/new.htm>
- For California Employees: State of California Medi-Cal Suspended and Ineligible Provider List available on their website at <https://www.medi-cal.ca.gov>

Anyone relocating from a state other than New York or New Jersey will be screened against the exclusion databases of any state in which they previously resided or worked, if that state maintains an online searchable database of excluded or debarred persons or entities.

Additionally, anyone relocating from a foreign country will be screened against the exclusion database of the Office of Foreign Assets Control – Specially Designated Nationals.

Following the screening, a list of all those screened will be saved by the Human Resources and Finance departments in the designated electronic folder. The Chief Compliance Officer or a Compliance Department designee will have access to records of the results of all screening efforts.

All affected individuals are advised through this policy of their obligation to immediately disclose to their supervisor, if applicable, and the Chief Compliance Officer if they become an excluded provider, or if they are charged with a criminal offense of a type that would cause them to become an excluded provider if ultimately convicted. In the event that this occurs, the Chief Compliance Officer will take appropriate steps to ensure that the responsibilities of such individual have not and shall not adversely affect the quality of care rendered to any recipient of YAI services, or the integrity of any claims submitted by YAI to any governmental payment program including Medicaid and Medicare.

Any individual who becomes an excluded provider shall immediately be removed from providing any services to or on behalf of YAI and from serving as an officer or member of the Board of YAI Network.

In addition to exclusion screening, the credentials of medical/health care and other professionals employed or retained to provide services to or on behalf of YAI will be verified with appropriate licensing and disciplining authorities to determine the authenticity of such credentials and whether any adverse actions have been taken against the individual that might impair their performance of duties, or fiduciary responsibilities on behalf of YAI. The process will cover physicians and other health care practitioners for which license/certification is required for their duties. This process will be conducted as part of the hiring and retention process. Credentials for all providers/healthcare professionals employed in Premier are checked by a third party upon hire and annually. Licenses for Nurses employed within YAI and NIPD NJ are checked by HR during onboarding and monthly on the relevant state database. YAI managers are responsible to verify any required direct report credential following the onboarding on an ongoing basis. For California, HR receives and verifies the professional certifications upon hire. The managers are responsible for tracking/renewal on an ongoing basis.

References:

For Policy Committee Use ONLY

Document History:

<u>Summary of Changes</u>	<u>Effective Date</u>
Initial Version	April 14, 2011

<p>Updates of Senior Management titles resulting from organizational restructuring and change in corporate logo. Content revision to reflect change in screening sources.</p>	<p>August 21, 2013</p>
<p>Updates of Senior Management titles resulting from organizational restructuring.</p>	<p>July 1, 2015</p>
<p>Format change. Addition of scope, assignment of responsibilities, addition of exclusion site. Removal of separate section for contractors (embedded in the rest of the policy). Addition of responsible parties for credentials. Title change. Other minor changes.</p>	<p>08/28/2023</p>