



GCP 2.02

Employee, Board, and Contractor Exclusion Screening

1.0 Purpose

Young Adult Institute, Inc. (“YAI”) is committed to maintaining high quality care and service 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 “Ineligible Persons”. External providers who order services provided by YAI will also be included in the screening process.

2.0 Procedures

Applicable to employees, individual independent contractors, officers, and board members

1. As soon as possible after the effective date of this Policy, YAI will screen all employees and other individuals who provide services for or on behalf of YAI, or who are officers or members of the Board of YAI, to ensure that they are not Ineligible Persons. A report of the process and results of this screening will be 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 the following sources to determine if any such individual’s name appears on any of the following lists:
 - 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/>
 - 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>
2. 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.
3. Additionally, anyone relocating from a foreign country will be screened against the exclusion database of the Office of Foreign Assets Control – Specially Designated Nationals.
4. Before any individual is permitted to commence providing services to or on behalf of YAI or to commence serving as an officer or member of the Board of YAI, the sources referred to above will be reviewed to ensure that he or she is not on any of the lists.
5. The Chief Compliance Officer will maintain a record of the results of all screening efforts.
6. All applications for employment or retention to be completed by any individuals who will provide services to or on behalf of YAI or who will serve as officers or members of the Board of YAI shall require the applicants to disclose whether they are Ineligible Persons. All contracts with any such individuals will include representations from such individuals that they are not Ineligible Persons.
7. All individuals who are providing services to or on behalf of YAI or who are serving as officers or members of the Board of YAI must be advised of their obligation

to immediately disclose to their supervisor, if applicable, and the Chief Compliance Officer if he or she shall become an Ineligible Person.

8. Any individual who shall become an Ineligible Person 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.
9. Each individual who is providing services to or on behalf of YAI or who is serving as an officer or member of the Board of YAI must be advised of his or her obligation to immediately notify the Chief Compliance Officer if he or she is charged with a criminal offense of a type that would cause him or her to become an Ineligible Person (if he or she is ultimately convicted) or if any governmental authority proposes to deem him or her to be an Ineligible Person. Every contract with any individual who is providing services to, or on behalf of, YAI or who is serving as an officer or member of the Board of YAI must contain an obligation to notify the Chief Compliance Officer of any such charges or governmental authority proposal.
10. If any individual who is providing services to, or on behalf of, YAI or who is serving as an officer or member of the Board of YAI is charged with a criminal offense of a type that would cause him or her to become an Ineligible Person (if he or she is ultimately convicted), or if any governmental authority proposes to deem him to be an Ineligible Person, then the Chief Compliance Officer will take such steps as shall be appropriate to ensure that the responsibilities of such individual have not and shall not adversely affect the quality of care rendered to any consumer of YAI services, or the integrity of any claims submitted by YAI to any governmental payment program including Medicaid and Medicare.
11. 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 his or her performance of duties, or fiduciary responsibilities on behalf of YAI. The process will cover physicians and other health care practitioners for which the license/certification is required for the performance of their duties. This process will be conducted as part of the hiring and retention process.

12. The screening of each individual who is providing services to or on behalf of YAI or who is serving as an officer or member of the Board of YAI shall be conducted as soon as possible after the date that this Policy becomes effective and thereafter at least once every thirty days.

Applicable to contractors

1. As soon as possible after the effective date of this Policy, YAI will screen all vendors and contractors not covered above who provide services or products for or on behalf of YAI to ensure that the vendor or contractor are not Ineligible Persons. A report of the process and results of this screening will be 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 the following sources to determine if any such individual's name appears on any of the following lists:
 - 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/>
 - 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>
2. Additionally, if the contractor or vendor does or has done business in any other country, the exclusion database of the Office of Foreign Assets Control – Specially Designated Nationals will also be searched.
3. Before any vendor or contractor is permitted to commence providing services or products to or on behalf of YAI, the sources referred to above will be reviewed to ensure that the vendor or contractor who provide services or products to or on behalf of YAI are not Ineligible Persons.

4. The Chief Compliance Officer will maintain a record of the results of all screening efforts.
5. All contracts with vendors or contractors who provide services or products to or on behalf of YAI will include representations from them that they are not Ineligible Persons, and that their employees or staff who will be providing services or products or on behalf of YAI are also not Ineligible Persons. Such contracts will also include an obligation to immediately disclose to YAI if it or any of its employees or staff who provide services or products to or on behalf of YAI if it, he or she shall become an Ineligible Person.
6. If any vendor or contractor who provides services or products to or on behalf of YAI shall become an Ineligible Person, its contract shall immediately be terminated and it shall cease to provide any services to or on behalf of YAI. If any employee or staff person of the vendor or contractor who is providing services or products to or on behalf of YAI shall become an Ineligible Person, then he or shall immediately cease to do so, and if deemed prudent, YAI may terminate the contract with the applicable vendor or contractor.
7. If any vendor or contractor that is providing services or products to or on behalf of YAI is charged with a criminal offense of a type that would cause it to become an Ineligible Person (if it is ultimately convicted), or if any governmental authority proposes to deem it to be an Ineligible Person, then the Chief Compliance Officer will take such steps as shall be appropriate to ensure that the responsibilities of such vendor or contractor have not and shall not adversely affect the quality of care rendered to any consumer of YAI services, or the integrity of any claims submitted by YAI to any governmental payment program including Medicaid and Medicare.
8. In addition to exclusion screening, YAI shall use its reasonable efforts to determine whether each contractor or vendor providing services or products to or on behalf of YAI has all applicable licenses and permits necessary to do so.

Version number	Summary of changes	Effective date
1.0	Initial Version (Compliance Monitoring and Auditing)	April 14, 2011
2.0	Updates of Senior Management titles resulting from organizational restructuring and change in corporate logo. Content revision to reflect change in screening sources.	August 21, 2013