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| **Policy Name:**  | **Sanction Screenings for Ineligible Persons** | **Date Revised:**  | **3/2020** |
| **Purpose:** | **Compliance with Federal Sanction Screening Requirements** | **Board Approval:** |  |

**Policy:**

It is the policy of Greater New Beginnings (GNB) to comply with County, State and Federal regulations concerning the eligibility of providers to bill and receiving funding for publicly-funded behavioral health services. GNB will provide updated staffing rosters, at least monthly, to Alameda County Behavioral Health Care Services (BHCS) for review of any significant deficiencies and/or sanctions. It is BHCS’s policy to review Greater New Beginnings’ capacity, including any significant deficiencies and/or sanctions, in evaluating GNB’s ability to receive new programs and contracts.

**Definitions:**

The following terms and processes are implemented and overseen by Alameda County BHCS:

1. Plan of Corrections (POCs), Quality Improvement Plans (QIPs), and Corrective Action Plans (CAPs) through BHCS Quality Assurance Office;
2. Contract Compliance Plans (CCPs) through the BHCS Network Office;
3. Administrative and Financial Sanctions through the BHCS Network Office and other BHCS offices, holding GNB accountable for implementing County, State and Federal requirements.

**Procedure:**

Greater New Beginnings will be held accountable for implementing County, State and Federal requirements. Alameda County BHCS will communicate expectations, provide training and technical assistance, conduct monitoring, and follow up with GNB on any identified regulatory deficiencies. BHCS will oversee formal CCPs, POCs, QIPs, CAPs and sanctions with providers if identified deficiencies persist beyond what BHCS determines as a reasonable timeframe for solution.

1. Communication and Technical Assistance (TA)
	1. Greater New Beginnings will receive communication and TA around existing emerging regulatory requirements through contractual documents, the BHCS provider website, memos, emails, trainings, meetings and/or one-on-one TA.
	2. GNB will follow up with BHCS if they require additional TA or consultation about any of the stated requirements, or any specific challenges or barriers being faced within the contracted program(s).
2. Monthly Screening Submission and Attestation Process
	1. Prior to contracting, Greater New Beginnings’ Quality Assurance Compliance Manager will submit a staff roster of all mental health staff expected to provide and bill for services. This staff roster will include the staff’s name, INSYST ID number, license number and license expiration date, as applicable.
	2. Once contracted and no later than the 15th of each month, GNB’s Quality Assurance Compliance Manager will utilize Alameda County’s online e-forms to submit any staffing changes, including any newly hired staff, staff who have recently departed, or any staff who have had a change in their clinical licensure. Through this process, GNB will attest to any changes or lack of changes to the staffing roster.
3. Monitoring and Informal Resolution Process
	1. BHCS will conduct provider compliance monitoring of County, State and Federal requirements through a review of submitted data, reports, site visits and communication with GNB regarding their administrative infrastructure and contracted program(s).
	2. Greater New Beginnings’ staff will be screened according to the information provided and attested to by GNB through BCHS’s online e-forms process. The following databases will be utilized in the sanction screening process by Alameda County BHCS:
		1. OIG Monitoring - List of Excluded Individuals and Entities (LEIE): <https://exclusions.oig.hhs.gov/>
		2. System for Award Management (SAM) Database: <https://www.sam.gov>
		3. Medi-Cal Suspended and Ineligible (S&I) Provider List:

<https://files.medi-cal.ca.gov/pubsdoco/SandILanding.asp>

* + 1. Social Security Death Master File: <https://www.ssdmf.com/>
	1. Any identified concerns or deficiencies will be brought to Greater New Beginnings’ attention by Alameda BHCS staff in a timely manner, with a goal of quickly addressing the issue(s) through discussion and TA whenever possible.
	2. Greater New Beginnings will not move forward with employment if an employee or contractor is identified to be on the Federal Office of Inspector General’s Excluded List of Providers, the Medi-Cal list of Suspended or Ineligible Providers, the System for Award Management (SAM) database, or the Social Security Death Master File. Additionally, if a current employee or contractor is identified on one of the above-mentioned lists during the monthly checks, immediate steps are taken to notify the Executive Director/Administrator who will recommend appropriate actions.
	3. If a deficiency(ies) is/are not addressed in a reasonable amount of time, GNB may be notified by BHCS to initiate a formal process.