



Carroll County Department of Fire & EMS

EMS Policy and Procedures

Standard Operating Procedure: 3.34	Effective Date: June 8, 2023
Subject: OIG Eligibility Screening and Exclusion Disclosure	Section: Emergency Medical Services
Authorized: Michael Stoner, Assistant Chief	Revision Date: N/A

I. POLICY

Carroll County Department of Fire & EMS (DFEMS) is not permitted to hire, retain, or do business with personnel that are excluded from federal and state healthcare programs. This policy outlines the process for all personnel, both uniform and non-uniform, to include operational volunteer members, observers, students, contractors, trainees, and others with whom DFEMS does business, to be properly screened for exclusions and ensure authorization to participate in federal and state healthcare programs.

II. DEFINITIONS

Exclusion List – Refers to the Office of Inspector General (OIG) list of Excluded Individuals/Entities (LEIE), the General Services Administration (GSA) Excluded Parties List System (EPLS), and any applicable State healthcare exclusion list.

Ineligible Person – means an individual or entity who:

1. Is currently excluded, suspended, debarred, or otherwise ineligible to participate in federally funded healthcare programs or in federal procurement or non-procurement programs; or,
2. Has been convicted of a criminal offense related to the provision of healthcare items or services and has not been reinstated in the federal healthcare programs after a period of exclusion, suspension, debarment, or ineligibility.

III. PROCEDURES

A. The Federal Government, through the OIG of the Department of Health and Human Services (HHS), has the authority to exclude individuals and entities who have engaged in fraud or abuse from participation in Medicare, Medicaid, and



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certain other federal healthcare programs. In addition, under federal procurement rules, the Federal Government's GSA has the authority to debar, suspend, exclude, disqualify, or otherwise declare ineligible individuals or entities from receiving federal contracts, certain subcontracts, and certain federal assistance and benefits. Those on the excluded list are not permitted to provide services that will be billed to a federally funded healthcare program (Medicare/Medicaid) and are not permitted to be involved in billing or related functions.

- B. All personnel, uniform, and non-uniform shall disclose in writing to their supervisor any criminal convictions, (as defined by 42 U.S.C. 1320a-7(i) and state law) or any action taken by the government to exclude the individual from participation in federally funded healthcare programs. Individuals who have been recently convicted of a criminal offense related to healthcare or who are listed as debarred, excluded, or otherwise ineligible for participation in federal healthcare programs (as defined in 42 U.S.C. 1320a-7b(f)) may not be considered for employment and/or as a volunteer member within DFEMS.
- C. Prior to establishing employment or a business relationship with any individuals, medical professionals, or contractors, DFEMS shall screen them against the current List of LEIE of the OIG.
 - 1. DFEMS shall also screen, on a monthly basis, those individuals and entities with whom it has engaged or otherwise has a business relationship.
 - 2. Each incidence in which an individual, entity, or contractor is listed as excluded by the OIG, the Fire Chief or designee shall be notified immediately.
 - 3. Anyone found to be on the Exclusion List shall be given an opportunity to investigate and determine whether this information is correct. The individual, entity, or contractor of the investigation may provide documentation indicating that they are not excluded or that reinstatement has been granted.
 - 4. Pending resolution of any proposed debarment, exclusion, or other ineligibility for participation in federal healthcare programs or the resolution of any criminal charges related to healthcare, all personnel, uniform or non-uniform, contractor, or vendor shall be removed from operational active duty, direct responsibility for, or involvement in any federal healthcare programs which affects DFEMS.



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5. If it is determined upon reasonable due diligence that and individual, entity, contracted professional, or vendor is listed as excluded by the OIG, the Fire Chief or designee shall be notified immediately for appropriate action, which may include termination of employment or contractual arrangement. Volunteer members may be removed from operational duty at the discretion of the Fire Chief or designee.
6. Prospective employees and vendors who have been officially reinstated into the Medicare and Medicaid programs by the OIG may be considered for employment, medical privileges, or a contractual relationship upon proof of such reinstatement and a determination that there are no other impediments to such action.

IV. RECISION

This Standard Operating Procedure rescinds all directives regarding OIG Eligibility Screening and Exclusion Disclosure or similar content previously issued for personnel of the Carroll County Department of Fire & EMS.