



UNIVERSITY POLICY

SUBJECT: ADMINISTRATION **TITLE:** EXCLUDED INDIVIDUALS AND ENTITIES

CODING: 00-01-10-08:00 **ADOPTED:** 11/19/99 **AMENDED:** 01/03/05

I. PURPOSE

To establish a policy governing the University of Medicine and Dentistry of New Jersey's (UMDNJ) employment of and entering into contracts with, individuals or entities who are currently excluded by the Office of Inspector General (OIG) and/or the General Service Administration (GSA) from participation in Federal health care programs.

II. ACCOUNTABILITY

Under the direction of the President, the Deans, Senior Vice President for Administration and Finance, Senior Vice President for Academic Affairs, Vice President for Legal Management, Vice President for Human Resources, Presidents/CEOs of the Healthcare Units, and Executive Director for Materials Management shall ensure compliance with this policy. The Department Chairs in each School, Department Directors of University Hospital and Department Directors of all UMDNJ Units shall implement this policy.

III. APPLICABILITY

This policy applies to **all** UMDNJ employees and **all** individuals/entities entering into a contract with UMDNJ.

IV. POLICY

In accordance with Federal law, UMDNJ will not employ or enter into contracts with any individual or entity who is currently excluded by the Office of Inspector General (OIG) and/or the General Service Administration (GSA) from participation in Federal health care programs.

V. PROCEDURE

Prior to hiring an individual, entering into contracts with any individual or entity, or extending clinical privileges at UMDNJ, the Department of Human Resources must verify that the individual or entity does not appear on the OIG or GSA listing of excluded parties.

Prior to entering into any contracts or purchasing agreements with any individual or entity, Purchasing Services must verify that the individual or entity certifies through an ownership disclosure statement that same does not appear on the OIG or GSA listing of excluded parties.

These listings can be accessed on the Internet in a searchable format:

(For OIG) <http://exclusions.oig.hhs.gov/>

(For GSA) <http://epls.amet.gov/>

1. If the above searches indicate that the individual or entity is on either the OIG or GSA list of excluded individuals and entities, this individual or entity cannot be employed or have any contractual relationship with UMDNJ, including the granting of clinical privileges.
2. To protect UMDNJ against individuals or entities excluded subsequent to their employment, during the duration of the contract, during the duration of the employment, or after the granting of clinical privileges, these searches also need to be performed by the Office of Business Conduct periodically, at a minimum of semi-annually.
3. If it is determined that a current employee, entity with a current contract, or non-employee physician with current clinical privileges is an excluded individual or entity, the Office of Business Conduct must be notified immediately. The Office of Business Conduct will perform an investigation to ascertain if in fact the current employee, entity with a current contract, or non-employee physician with current clinical privileges is on the exclusion list. If it is determined that the individual and/or entity is on the exclusion list, the employment and/or contractual relationship shall be immediately terminated.
4. If a person in a supervisory capacity learns that a member of his/her staff and/or an entity being utilized is on the excluded list, he/she must notify the Office of Business Conduct immediately. Failure to notify the Office of Business Conduct may result in sanctions being imposed, up to and including termination.
5. If an individual learns that he/she is on the excluded list, or if an entity he/she is utilizing is on the excluded list, he/she must notify the Office of Business Conduct immediately. Failure to do so will result in sanctions being imposed, up to and including termination.

By Direction of the President:

Senior Vice President for Administration and Finance