

EVMS MEDICAL GROUP		
POLICY: Compliance Guidelines for Independent Contractors, Agents, and Ancillary Suppliers of Medical Services	DATE: 1/23/2002	
CATEGORY: COMPLIANCE	REVIEWED/ REVISED: April-13	Page 1 of 1

PURPOSE: To establish guidelines for the review of the status of independent contractors, agents, and ancillary suppliers of medical services.

PROCEDURE:

1. The Compliance Officer will review via the Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE), the Excluded Parties List System (EPLS), and the National Practitioner’s Data Bank, the status of Independent contractors, Agents and Ancillary providers of Medical Services to determine the existence of any criminal action, proceeding, or debarment from participation in federal health care programs.

2. Reports will be provided to the Administration, the Governing Body, and legal counsel on any such contractors, providers, or agents, prior to contract execution and on an ongoing basis.

3. The foundation will not enter into arrangements with contractors, providers, or agents who have been debarred from participation in federal health care programs, or place debarred foundations or individuals in positions of direct responsibility for health care programs.

4. Debarment from participation or conviction of criminal offenses or federal health care offenses will be considered grounds for termination of all contracts with contractors, providers, or agents, and this will be so stated in all contracts.

5. Contractors, providers or agents will certify in contracts that they are not presently debarred from participation or in violation of federal health care law or regulation. These entities will further specify that they have not been convicted of and are not currently pending investigation or conviction for a criminal health care offense.