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**Corporate Compliance – Non-Hiring, Retention or Contracting with Sanctioned Individuals or Entities AD.CC55**

**POLICY:**

Lifesong Hospice and Palliative Care does not employ, retain or contract with individuals or entities who have been convicted of a criminal offense related to health care or who are listed by the Office of the Inspector General as debarred, excluded from or otherwise ineligible for participation in Federal health care programs.

**PROCEDURE:**

1. All potential Board members, employees and volunteers are required to answer questions related to eligibility to participate in a health care program that receives Federal reimbursement.
2. Prior to offering employment or volunteer opportunities to an applicant, online databases are consulted to ensure the individual is eligible for employment at Lifesong Hospice and Palliative Care.
3. A listing of sanctioned / excluded individuals or contractors is consulted by accessing the *List of Excluded Individuals/Entities* (LEIE) at:  
[http://oig.hhs.gov/fraud/exclusions/exclusions\\_list.asp](http://oig.hhs.gov/fraud/exclusions/exclusions_list.asp)
4. The LEIE is consulted monthly to ensure that no current employee, volunteer, or contracted individual or entity has been excluded since the last search.
5. All employees are required to immediately inform their supervisor if there is the potential for them to be added to LEIE.
6. The LEIE is also checked for the names of all referring, attending, or other physicians or others who write orders for the hospice's patients to ensure care and services are not ordered by excluded individuals or entities.

Created:	Reviewed:	Revised:	Effective:
4/2018	9/2018		4/2019