Title: Medicaid Exclusion List Screening Policy for Delphi Rise	**Created by:** Jennifer Cathy, President and CEO
Date Created: January 14, 2025	**Reviewed by:** Human Resources; Miriah DeJesus, Executive Administrative Assistant

Purpose

Delphi Rise is committed to ensuring compliance with federal and state Medicaid requirement by screening all staff, Board members, and vendors against applicable exclusion lists. This process prevents excluded individuals or entities from participating in Medicaid-funded activities and safeguards the integrity of our programs.

Policy Requirements

1. Who Must Be Screened:
    - **Staff:** All Delphi Rise employees, including administrative, clinical, and support roles.
    - **Board Members:** Individuals serving on Delphi Rise's governing body.
    - **Vendors:** Organizations or individuals providing goods or services paid for directly or indirectly, with Medicaid funds.
        - Vendors must also screen their affected individuals (e.g., employees, subcontractors, owners, or agents involved in Medicaid- funded services) and certify compliance.
2. Screening Frequency:
    - Screenings will be conducted every 30 days against the following exclusion lists:
        - Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE).
        - General Service Administration (GSA) System for Award management (SAM)
        - The OMIG Medicaid exclusion list and any other applicable state exclusion lists.
3. Personal Identifiers:
    - **Date of Birth (DOB):** Delphi Rise will require DOBs to ensure the accuracy of screenings.
    - Additional Identifiers (e.g., Social Security Numbers, if necessary) may be requested for resolving discrepancies during the screening process.
4. Consent Requirement:
    - Delphi Rise will obtain signed consent from all staff, Board members, and vendors to collect and use personal identifying information (e.g., DOBs) for the purpose of exclusion list screenings.
    - The consent form will clearly outline the purpose of screenings and how the information will be used and safeguarded.
5. Vendor Compliance:
    - Vendors are responsible for screening their affected individuals (e.g., employees, subcontractors, and agents) against the same exclusion lists.
    - All vendor agreement will include a clause requiring vendors to:
        - Certify compliance with exclusion screening requirements.
        - Provide proof of their screening process upon request by Delphi Rise.
6. Documentation and Recordkeeping:
    - Delphi Rise will maintain records of all screenings, including names, dates, DOBs, and screening outcomes.

- Policies and procedures for conducting and documenting screenings will be reviewed and updated regularly to ensure compliance.

7. Corrective Action:
    - If any staff member, Board members, or vendor is found on an exclusion list:
        - Immediate corrective action will be taken, such as removal from Medicaid-funded activities or termination of contracts.
        - Delphi Rise will self-disclose any identified exclusions to the appropriate regulatory body, such as OMIG.

Implementation and Oversight:

Delphi Rise will utilize secure systems to manage exclusion screenings and handle sensitive information. By obtaining consent, maintaining transparency, and ensuring all individuals and entities are screened monthly, Delphi Rise is committed to full compliance with Medicaid regulations.

This policy reflects Delphi Rise's dedication to maintaining ethical and compliant practices in all its operations.