Title: Medicaid Exclusion List Screening Policy for Delphi Rise	
Review date(s): 1/14/25; 8/25/25; 11.14.2025	**Approved by:** J. Cathy, President and CEO; M LaDuca, COO
Revised date(s): 8/25/25; 11.14.2025	**Policy Owner:** Jennifer Cathy, President and CEO
Approved Date: November 14, 2025	**Original Effective Date:** January 14, 2025

Purpose

Delphi Rise is committed to maintaining compliance with federal and state Medicaid requirements by screening all staff, Board members, and vendors against applicable exclusion lists. This process ensures that no excluded individual or entity participates in Medicaid-funded activities and safeguards the integrity of our programs.

This policy applies to all "affected individuals," including but not limited to employees, senior administrators, managers, contractors, subcontractors, agents, independent contractors, governing body members, and corporate officers.

Definitions
- **Affected Individuals:** All persons who are affected by the risk areas of Delphi Rise including its employees, the chief executive, other senior administrators, managers, contractors, agents, subcontractors, independent contractors, governing body and corporate officers, collectively referred to herein as "affected individuals."
- **Exclusion:** Federal or state determination that prohibits an individual or entity from participating in federally or state-funded healthcare programs.
- **Exclusion Lists:** Official databases maintained by regulatory authorities to identify excluded parties.
- **Vendors:** Any organization or individual that provides goods or services to Delphi Rise under contract.

Policy Requirements

1. Who Must Be Screened
- All Delphi Rise affected individuals.
- Vendors must also screen their own affected individuals (employees, subcontractors, owners, and agents) and certify compliance in writing.

2. Screening Frequency
- Screenings will be conducted **every 30 days** against:
    - Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE).
    - General Services Administration (GSA) System for Award Management (SAM).
    - New York State Office of the Medicaid Inspector General (OMIG) Exclusion List.
    - Any additional state or federal exclusion databases as required.

3. Personal Identifiers
- **Date of Birth (DOB):** Required to ensure accurate results.
- **Additional Identifiers:** Social Security Numbers or other identifiers may be requested only to resolve potential discrepancies.

4. Consent Requirement
- Delphi Rise will obtain signed consent from all staff, Board members, and vendors to collect and use identifying information for exclusion screening.
- The consent form will clearly explain the purpose of screenings, use of data, and safeguards for confidentiality.

5. Vendor Compliance
- All vendor agreements will include exclusion screening language requiring vendors to:
    - Certify compliance with this policy.

- o Conduct monthly screenings of their affected individuals.
- o Provide proof of their screening process upon request.
- Failure to comply may result in termination of the contract.

Responsibilities and Oversight
- **Human Resources (HR Generalist):**
  - o Collects and inputs required personal identifiers (e.g., names, DOBs) for all affected individuals into the external vendor's screening system.
  - o Ensures new hires, Board members, and vendors are entered at onboarding and included in monthly screenings. *(Note, Finance sends information on new one-time vendors for submission PRIOR to payment).*
  - o Maintains documentation of consent forms.
- **External Screening Vendor:**
  - o Conducts monthly screenings of all affected individuals against required exclusion databases.
  - o Provides Delphi Rise with detailed reports of screening results, including potential matches or discrepancies.
- **Compliance Officer:**
  - o Reviews screening reports received from the external vendor each month.
  - o Verifies potential matches and determines appropriate next steps in collaboration with HR.
  - o Escalates confirmed exclusions immediately to the CEO and initiates the self-disclosure process with OMIG/OIG as required.
  - o Documents all screening results, follow-up actions, and resolutions.
- **Training and Communication:**
  - o The Compliance Officer, in collaboration with HR, is responsible for training staff, Board members, and vendors on exclusion screening requirements.
  - o Training occurs at hire/orientation and as part of annual compliance education.
  - o Vendors are informed of their contractual responsibility for screening their own affected individuals.
- **Reporting Lines:**
  - o The Compliance Officer provides **quarterly reports** on screening activity and findings to the **Compliance Committee**.
  - o Significant findings, such as a confirmed exclusion, are reported immediately to the **Board Compliance Liaison** and the **Board of Directors** at the next scheduled meeting.
  - o An **annual summary report** of exclusion screening compliance is provided to the full Board of Directors as part of the Compliance Plan review.

Documentation and Recordkeeping
- Records will include names, dates, DOBs, screening outcomes, and resolution of any discrepancies.
- Screening records will be securely maintained for a minimum of **six (6) years**, consistent with Medicaid record retention requirements.

Corrective Action
- If an affected individual or vendor is identified on an exclusion list:
  - o They will be immediately removed from all Medicaid-funded activities.
  - o Employment or contracts may be terminated in accordance with Delphi Rise's Corrective Action Policy.
  - o Delphi Rise will self-disclose to OMIG or other regulatory authorities under the OMIG Self-Disclosure

Protocol.

- o Repayment of improperly billed Medicaid funds will be initiated as required.

Reporting & Oversight
- The Compliance Officer will report screening activity and findings quarterly to the Compliance Committee and annually to the Board of Directors.
- This policy will be reviewed annually and revised as needed to align with federal and state regulations.

Implementation and Oversight

Delphi Rise will utilize secure systems and an external vendor to conduct exclusion screenings, maintain confidentiality of sensitive data, and ensure ongoing compliance. By obtaining consent, conducting timely screenings, and enforcing accountability, Delphi Rise reaffirms its commitment to ethical practice and Medicaid program integrity.

Cross References
- Corporate Compliance Plan
- Corrective Action Policy
- Procurement and Vendor Oversight Policy
- HR Background Check and Hiring Policy