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OIG adds checking publicly available state Medicaid exclusion lists to CIAs

by Betsy Wade

The U.S. Department of Health and Human Services Office of Inspector General (OIG) recently updated its Corporate Integrity Agreement (CIA) requirements to include screening of publicly available state Medicaid exclusion lists in addition to the federal List of Excluded Individuals/Entities (LEIE).^[1] OIG Senior Counsel Laura E. Ellis announced during a presentation at the annual Health Care Compliance Association Compliance Institute in Anaheim, California, in April.^[2]

In accordance with Sections 1128^[3] and 1156^[4] of the Social Security Act, healthcare organizations are prohibited from hiring or doing business with excluded persons or entities. This means all healthcare organizations participating in federal healthcare programs—whether under a CIA or not—are required to conduct routine sanction screening. Healthcare organizations should be screening the federal and publicly available state lists for any entity or individual they intend to contract with or employ.

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