

UConn HEALTH

2001-03 Sanctions and Exclusions - Procedures

In accordance with UConn Health Administrative Policy **2001-03: Sanctions and Exclusions**, the Office of Healthcare Compliance & Privacy oversees monthly screening of individuals and entities with whom UConn Health has an employment or business relationship. This screening evaluates for exclusion, sanction, debarment, or other action per the current U.S. Department of Health and Human Services Office of Inspector General (OIG) List of Excluded Individuals and Entities (LEIE), relevant state sanction and exclusion lists including any State of Connecticut lists, and the General Services Administrations (GSA) System for Award Management (SAM) exclusion list, and others, as applicable.

1. Upon hire, UCH will run background checks. Anyone confirmed to be debarred or excluded will not be hired.
2. Monthly, the OHCP obtains individual and entity data for the following:
 - a. Current employees
 - b. Current students
 - c. Current affiliates
 - d. New vendors (have not received payment but established as a UConn Health vendor)
 - e. Vendors paid within the prior X months
 - f. New contractors (have not received payment but established as a UConn Health contractor)
 - g. Contractors paid with the prior X months
 - h. Any other individuals and entities paid by or on the behalf of UConn Health in the prior X months

The data collected may include the following for individuals:

- a. Legal name, including first, middle, and last
- b. Former name(s), including aliases and maiden names
- c. Date of birth
- d. Social Security number
- e. Current and former addresses

The data collected may include the following for entities:

- a. Legal name and any Doing Business As name(s)
- b. Dates of incorporation
- c. [What else?]

3. OHCP submits the data for comparison against the applicable lists of sanctioned, excluded, debarred, or otherwise precluded individuals or entities.
4. For any flagged potential match, indicating a possible impermissible employment or business relationship with an individual or entity, the OHCP may require additional data for further verification. Under these circumstances, a member of the OHCP contacts the operational leader of the individual or vendor/contractor agreement via email to request additional information.
5. As a contacted operational leader, reply to the OHCP email within the delineated timeframe with the following:
 - a. The requested additional information, possibly obtained directly from the individual or entity flagged, **or**
 - b. Request for the individual or entity to complete a legally binding affidavit attesting that the flagged individual or entity has not been excluded, sanctioned, debarred, etc. This process requires a witness.
6. For any verified impermissible employment or business relationships with an individual or entity, a member of the OHCP contacts the operational leader and executive leadership via email with next steps to review the findings and take remedial action.
7. The OHCP maintains all documentation associated with this process in accordance with applicable data privacy, security, and retention requirements.