

NORTH PENN SCHOOL DISTRICT
School Board Policy

4150(a)

PERSONNEL

Professional and Support Staff

Screening of Employees and Contractors for Exclusion from Participation in Federal Health Care Programs

Reference: Administrative Regulation #4150

Purpose

In addition to providing educational services, the district also provides health care services in the form of, but not exclusive to, nursing, physical therapy, occupational therapy, speech therapy, and psychological educational evaluations. As a health care provider that participates in the Medical Assistance (MA) Program, the district is required to screen its employees and contractors, individuals and entities, that are associated with the School Based ACCESS Program. The screening will determine if an individual or entity has been excluded from participation in Medicare, Medicaid, or any other federal health care program.

Requirements

Employees, vendors, contractors, service providers, and referral sources that are associated directly or indirectly with a Medicaid/federally funded health care service will be screened at time of hiring or contracting and then monthly thereafter.

Screening will be conducted on:

- Individual or entity who provides a service for which a claim is submitted to Medicaid
- Individual or entity who causes a claim to be generated to Medicaid
- Individual or entity whose income derives all, or in part, from Medicaid funds
- Individual contractors if they are billing for Medicaid services
- Referral sources, such as providers who send a Medicaid recipient to another provider for additional services or second opinion related to a medical condition

Appropriate personnel will be screened on three designated web sites which list those that have

4150(b)

been excluded from participating in any Federal Health Care Programs. The district will utilize designated staff and /or a contracted sanction screening service to comply with this policy.

Individuals and/or entities found to have “exclusion status” will be notified of this status and reported to the Pennsylvania Department of Public Welfare’s Bureau of Program Integrity. An internal self-audit will be conducted to determine the extent of liability associated with the exclusion. Other appropriate district staff will be notified of employees and contractors found to have “exclusion status”.

Auditable documentation of screening efforts will be maintained by the ACCESS Specialist and will be available for tracking and audit purposes.

Policy:

Adopted: December 13, 2012