

UNIVERSITY OF ROCHESTER MEDICAL CENTER	UNIVERSITY OF ROCHESTER MEDICAL CENTER POLICY	Compliance Committee
	SECTION Compliance	March 2002
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PURPOSE:

To ensure that University employees, Board members and vendors have not been excluded from federal and/or state health care programs.

POLICY:

The University shall not knowingly employ or do business with any person or business that has been excluded from federal or state health care programs.

PROCEDURE:

- 1.) All applicants for employment shall be required to disclose whether he or she has been or is currently excluded from participation in federal and/or state health care programs.
- 2.) Prior to an offer of employment, all applicants for employment shall be checked against the Office of Inspector General (OIG) List of Excluded Individuals and Entities, the General Services Administration (GSA) SAM list, the US Treasury list, and the NYS Medicaid Inspector General list. All matches will be brought to the attention of the Corporate Compliance Officer and the Office of Counsel to the Medical Center for further investigation.
- 3.) On a monthly basis, all University employees, Board members and vendors will be checked against the Lists mentioned in #2 above to ensure that the University is not employing or doing business with anyone that is excluded from federal and/or state health care programs. All matches will be brought to the attention of the Corporate Compliance Officer and the Office of Counsel to the Medical Center for further investigation.

