



OIG INCREASES EXCLUSIONS DURING FY 2013

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On January 31, 2014, the U.S. Department of Health and Human Services (HHS), Office of Inspector General (OIG) released their annual [Work Plan](#). The Fiscal Year (FY) 2014 Work Plan was released months past the typical release in October. Nevertheless, the OIG provided its usual insight on the various activities currently ongoing and upcoming with respect to HHS programs and operations.

Each year, I scan the Work Plan to find the OIG's update on healthcare program exclusions. During FY 2013, the OIG excluded **3,214 individuals and entities** from participation in federal healthcare programs. Exclusions continue to increase year by year, which is highlighted in the exclusion of 3,131 and 2,662 parties during FY 2012 and FY 2011, respectively. The increasing numbers show the OIG's enforcement trend of identifying parties not suitable for participating in federal healthcare programs and effectively excluding those parties.

The OIG has the authority to exclude individuals and entities it determines are unfit to participate in federal healthcare programs. Exclusions are typically made based on referrals from other federal and state agencies, which the OIG works with to ensure timely notification of convictions and licensing board, administrative and sanction actions. Reasons for exclusions include, but are certainly not limited to, the following actions:

- Program-related convictions
- Patient abuse or neglect convictions
- Licensing board disciplinary actions
- Actions that pose a risk to beneficiaries or programs

The take away here is, don't stop your sanction checks! It is important to continue to screen new hires, contractors and vendors at the time of engagement, as well as periodically thereafter. The best practice is to screen your workforce and engaged parties on a monthly basis to reduce your risk and avoid potential civil monetary penalties liability.

To learn about the importance of conducting sanction checks and how to avoid hiring or engaging with an excluded individual or business visit [Sanction Screening Services](#).

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