

Eli's Rehab Report

Add "Check Exclusion List" To Your Hiring Policy

Spot and report exclusion mistakes before the OIG comes knocking.

If you forget to check the **HHS Office of Inspector General's** exclusion list when you hire new employees, you could wind up in the same expensive boat as **American Senior Communities** in Indianapolis.

The nursing and rehabilitative care provider ponied up \$376,000 in civil money penalties to the OIG for employing seven excluded individuals, the OIG says in a release.

ASC might have gotten off lighter if it had discovered and reported the problem itself. "Providers self-disclosing such violations will ultimately pay lower settlement amounts," **Lewis Morris**, Chief Counsel to the OIG, says in a release. "But in cases initiated by the government -- such as this one -- providers will, as a matter of course, be required to pay more to resolve the matter."

Remember contractors: "Providers need to check their employees and contractors on the OIG excluded list," urges consultant **Tom Boyd** with Rohnert Park, Calif.-based **Boyd & Nicholas**. The exclusions list applies to contractors too, the OIG reminds providers.