

# EPSTAFFCHECK



## Why EPStaffCheck?

- Prevent unexpected recoupments and refunds from Medicare and other federal and state programs
- Efficiently and cost-effectively perform regular follow-up checks of all employees, contractors, and medical staff.
- Searching is easy and fast—results in seconds
- Automatic batch searches ensure ongoing compliance with minimal staff time
- Unlimited searches, one low annual cost of \$495
- Upload your staffing and vendor rosters for immediate verification and weekly, monthly, or quarterly updates
- Documentation on all searches is print-ready for your records
- Accurate, updated daily from over 114 government agencies
- Intelligent search ensures fewer false negatives
- Detailed information on possible matches for easier review
- Secure, encrypted, password-protected system

Simply and immediately verify that a provider, vendor, staff member, or new hire is not in Medicare exclusion databases, terrorist watch lists, student loan defaults, or other monitored government watch lists. Schedule automatic batch reviews of your entire staff at no added cost!

The screenshot shows the EPStaffCheck web application interface. The search results table is as follows:

Name	City	State	ZIP Code	UPIN/NPI	DOB	Verify
Davenport, Melissa	Gulfport	MS	39507			<input checked="" type="checkbox"/>
Missela Davenport	Gulfport	MS	39507		02/08/67	<input checked="" type="checkbox"/>

The detailed result for the second entry is shown on the right:

Name	Missela Davenport
City	Gulfport
State	MS
Zip Code	39507
UPIN/NPI	
DOB	02/08/67
DB	OIG
Sanction Type	1128b4
Specialty	Nurse/Nurses Aide
General	Private Citizen
Reinstatement Date	Indef.
Sanction Date	08/20/2000

*“No payment will be made by any Federal health care program for any items or services furnished, ordered, or prescribed by an excluded individual or entity.”*

**Annual Subscription per Facility: \$495**  
**Unlimited Usage, Free Web Training,**  
**Unlimited Toll-Free Support**

**NEW! State databases available for only \$130/year.**

**Request a FREE 14-Day TRIAL**  
[www.EPStaffCheck.com](http://www.EPStaffCheck.com)



**888-395-9029**  
**www.EPStaffCheck.com**

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## FREQUENTLY ASKED QUESTIONS

***If an employee/contractor is listed as excluded, what do we need to do?***

First, verify that the employee or contractor really is a match to the results that were returned. You can do this with a social security match for some databases. If the person really is an excluded party, you need to immediately involve your Compliance Officer and Legal Department in taking the steps necessary to become compliant and/or make repayments as necessary.

***If we contracted with an excluded party for a short period of time and self-report, what kind of penalties can we expect?***

Although there is no definite rule regarding such situations, previous settlements indicate that if a facility has a system for identifying excluded individuals, and identifies and self-reports a problem that is determined through such checking, that penalties are minimal. If the excluded individual was a physician who ordered or performed services, there may be recoupment for funds already received, but the penalty portion is typically mitigated if you exercise a good faith effort to identify excluded individuals.

***What are the federal guidelines on determination of penalties?***

The law provides for penalties of up to \$10,000 for each item or service furnished, or each entry in a cost report, or other documentation used to support a claim for federal program (including state Medicaid program) reimbursement. The law also provides for an assessment of up to three times the amount claimed for each item or service. There is also a guideline that in most cases the amount of the penalty should not be less than twice the approximated amount of damages and costs sustained by the government, including investigation costs, prosecution, and administrative case review. To view recent OIG settlement summaries, visit <http://oig.hhs.gov/fraud/enforcement/administrative/cmp/cmpitems.html#2>

***Should we be verifying the criminal background on all employees also? What about bankruptcies and civil judgments?***

You should only go to the effort and expense of gathering this information if you have a credentialing process that defines how it will be used and evaluated. You must have a clear, legally defensible policy that is uniformly applied to avoid complaints of discrimination. Obtaining the information may be expensive and time-consuming, and the results received will not include many jurisdictions who do not have archived records electronically available. Your policies should be clear on how to treat a DUI from 20 years ago, an arrest but no charges filed for domestic violence, and a bankruptcy from 2 years ago, and a justification for why such behavior is deemed relevant to their expected practice of medicine in your facility today. If you collect information that you don't use, such information could be used against you in a civil case (for example, a physician with an old DUI accused of malpractice while intoxicated, and a patient's attorney argues that you had reason to know and greater obligation to monitor). Although this is a legal issue each facility needs to address, a good rule of thumb is not to collect information that you do not have a clear and objective policy for evaluating.

***Does this replace the NPDB (National Practitioner Data Bank)?***

No, you should still perform routine queries of the NPDB and the medical boards granting licensure.

***We receive exclusion information through our NPDB queries. Is there any reason to run EPStaffCheck also?***

Although the NPDB offers an additional service to check exclusion information, the costs are approximately \$3.25 per physician per year. EPStaffCheck is much more economical. Additionally, the NPDB does not offer exclusion checking for your non-practitioner employees, or for your vendors.

***Do we need to check employees and vendors if they are not involved in direct patient care?***

Yes. The prohibition against contracting with an excluded entity extends to administrative and/or management services that are not direct patient care, but that are a necessary component of the overall services being provided to federal program beneficiaries. Federal program funds include those received via claims submission, cost reports, fee schedules, pass-through costs and other payment systems that are ultimately funded at least in part by federal dollars.

***Is there any legal way for us to employ or contract with an excluded party?***

The only permissible way to conduct business with an excluded party is to establish a system to ensure that the items or services are paid for exclusively with private, non-federal funding sources, and that the items or services are related only to non-federal program patients. Such costs may not be included on cost reports or other similar documentation or requests for reimbursement.

***Why is EPStaffCheck priced as an annual subscription?***

We don't believe it is in our client's best interests to be charged for every query. We want to encourage facilities to perform checks on all employee, staff, and vendor relationships, and to do those checks on a regular basis. This allows them to be aware very quickly of potential exclusions, and thus avoid large repayments. In fact, we recommend that clients run a monthly batch check. Why? Because it takes no extra time to do it, identifies problems as early as possible, and costs them nothing extra.