

County Of San Diego
Health and Human Services Agency (HHSA)

**SUBJECT: HHSA Screening for
Ineligible Persons**

NO: HHSA-M-4.2
PAGE: 1 of 1
DATE: September 28, 2017

**REFERENCE: State Agreements, U.S. Department of Health and Human Services, Office of
Inspector General.**

POLICY: In order to establish a formal and robust program that will act as an internal control measure, mitigating the potential for violations of health care and human services laws, regulations and ordinances, the Health and Human Services Agency (HHSA) shall maintain a Compliance Program with specific guidance over HHSA programs. The Agency Compliance Office shall be directed by the HHSA Agency Compliance Officer. As a condition of participation in federal health and social service programs, regulations prohibit the employment of, or contracting with, any individual or entity who is excluded, debarred or deemed ineligible. The Agency Compliance Office shall provide oversight to ensure adequate assurance that sanction screening is properly and consistently performed:

- By Human Resources, prior to an offer of employment to an HHSA position, and monthly thereafter
- By HHSA prior to the award of a contract
- By Contractors, monthly, unless contractor has an approved Sanction Screening waiver

RESPONSIBILITIES: HHSA is committed to providing high-quality, cost effective health care and human services in compliance with all federal, State and local laws, regulations and ordinances. Violations of these laws, regulations and ordinances by HHSA employees, contractors or agents may expose HHSA to the risk of substantial penalties. The Agency Compliance Office is responsible for establishing policies and procedures to promote a working environment that fosters adherence to these requirements and demonstrates high ethical standards in carrying out the Mission, Vision and Values of HHSA.

PROCEDURES: See related procedures and forms at www.cosdcompliance.org.

QUESTIONS: HHSA Compliance Officer at 619-338-2807

Approved: _____


Christy Carlson, CCEP
Group Program Manager, Compliance