



EXCLUSION, DEBARMENT, & MEDI-CAL SANCTION CHECKS

Requirements for HHSA Providers

County of San Diego – Health and Human Services

Business Assurance and Compliance

March 2025

Disclaimer



This slide deck is intended as a resource to assist HHSA providers with common topics related to their Exclusion, Debarment, and Medi-Cal Sanction (EDM) check requirements. The Business Assurance and Compliance Office also provides a Helpful Hints slide deck and a Visual Assistance Guide slide deck related to running the EDM checks. This slide deck is not intended to be a comprehensive set of contract requirements nor legal advice. For a comprehensive description of your contractual requirements, review your contract language.

EDM Checks- Requirements



What are they?

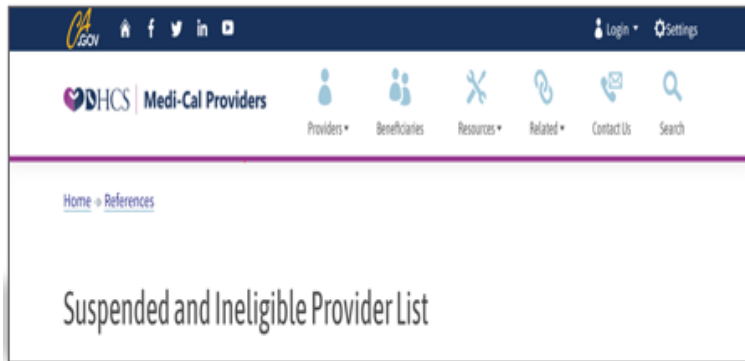
- Exclusion, debarment, and Medi-Cal sanction checks are verifications that providers are required to run monthly
- We often refer to these as 'EDM checks'
- The requirement is generally stated in the County contract template language, section 8.16



EDM Checks- Requirements



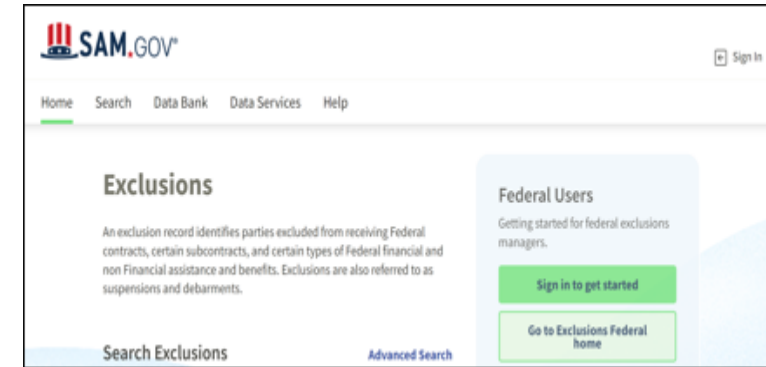
EDM Checks Involve Review of 3 lists. Links can be found [here](#)



“Medi-Cal Suspended and Ineligible List” maintained by California’s Department of Health Care Services – list of those who cannot receive Medi-Cal funds (a.k.a. Medi-Cal list)



“List of Excluded Individuals” maintained by the federal Health and Human Services, Office of Inspector General – list of those ineligible to work in federally funded health care programs (a.k.a. OIG or LEIE list)



“Debarment List” by the General Services Administration, System of Award Management – list of those prohibited from receiving federal contract, procurement, or non-procurement funds (a.k.a. SAM/EPLS list)

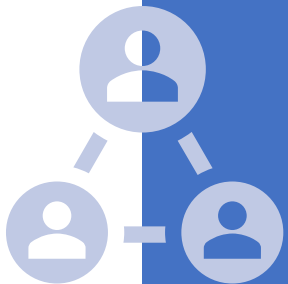
EDM Checks- Requirements



On whom do Providers perform checks?



Federal, State, and HHSA EDM check requirements roll down, meaning all HHSA providers must perform EDM checks, even those providers that do not receive federal or state funds. EDM requirements also roll down to a primary provider's subcontractors, agents, and consultants



All providers' workforce members require EDM checks. 'Workforce members' include:

- Positions paid by the contract, including those paid through indirect funds or overhead
- Those with access to County clients or County client data, even if the position is unpaid

EDM Checks- Requirements



What are Providers' requirements?

Check all workforce members, every month, against all three lists

Maintain documentation that the checks were run monthly, on all workforce members, and all workforce members were cleared. This is true even if you have a third-party run the checks

Clear' any workforce members whose names appear on any of the lists

Include EDM requirements in subcontracts and monitor subcontractor EDM check compliance

For more information on how to search or clear workforce members, see our 'Exclusion, Debarment, & Medi-Cal Sanction Checks Helpful Hints for HHSA Providers' or 'Exclusion, Debarment, & Medi-Cal Sanction Checks Visual Assistance Guide for HHSA Providers' slide decks

EDM Checks- Requirements



More questions? Ask us!



Website:

www.cosdcompliance.org



Phone Number:

(619) 237-8571



Mailbox:

PrivacyOfficer.HHSA@sdcounty.ca.gov

Compliance.HHSA@sdcounty.ca.gov