



EXCLUSION, DEBARMENT, & MEDI-CAL SANCTION CHECKS

Visual Assistance Guide for HHSA Providers

County of San Diego – Health and Human Services Agency

Business Assurance and Compliance

February 2025

Disclaimer



This slide deck is intended as a resource to provide a helpful visual aid related to performing Exclusion, Debarment, and Medi-Cal Sanction (EDM) checks. HHSA's Business Assurance and Compliance Office also provides a separate slide deck on EDM requirements for HHSA providers, and another slide deck on EDM check helpful hints. These slide decks are not intended to be a comprehensive set of requirements nor legal advice. For a formal description of your contractual requirements, review your contract language.

Additional Resources



More information regarding EDM checks:

[Exclusion, Debarment, & Medi-Cal Sanction Checks Requirements for HHSA Providers](#)

[Exclusion, Debarment, & Medi-Cal Sanction Checks Helpful Hints for HHSA Providers](#)

[Exclusion, Debarment, & Medi-Cal Sanction Checks FAQ](#)

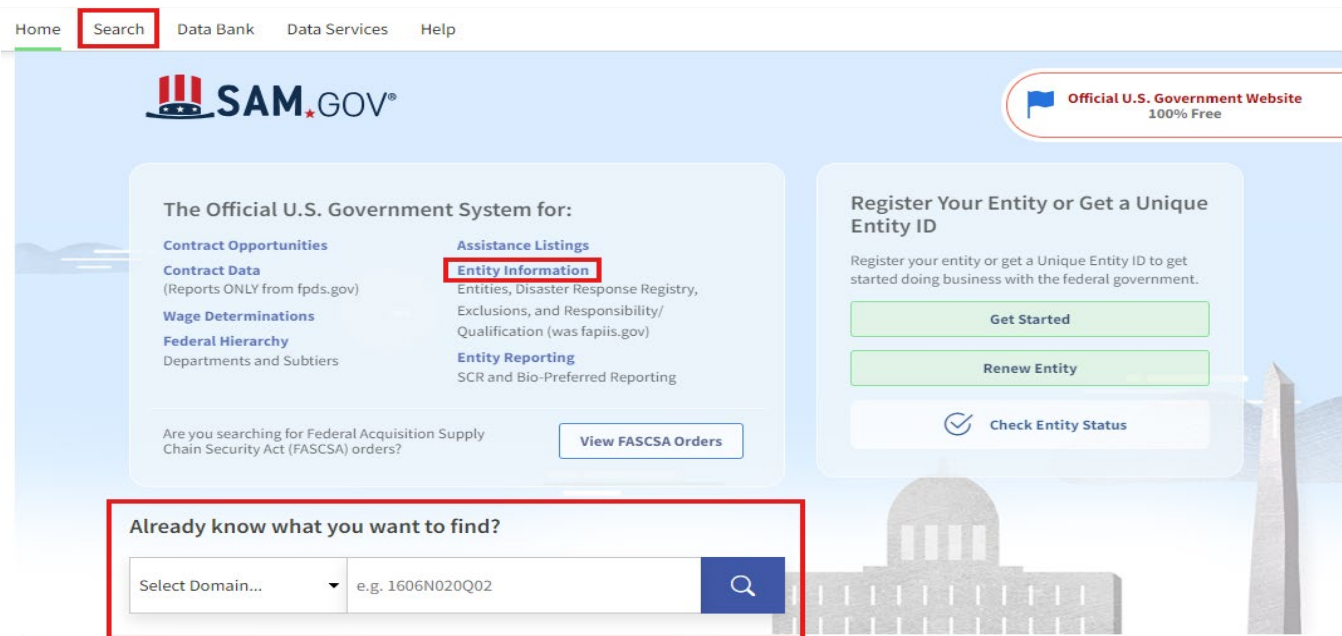
Links to the lists used for EDM checks can be found here:

[Provider Resources](#)

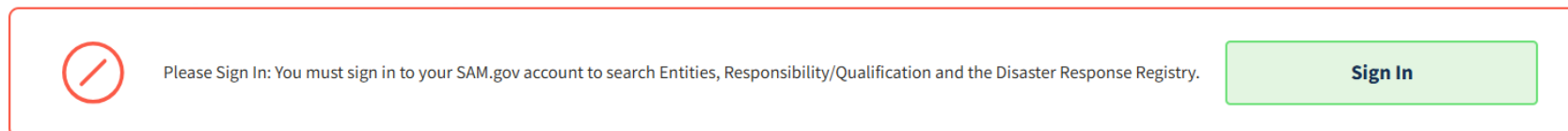
General Services Administration (SAM.gov)



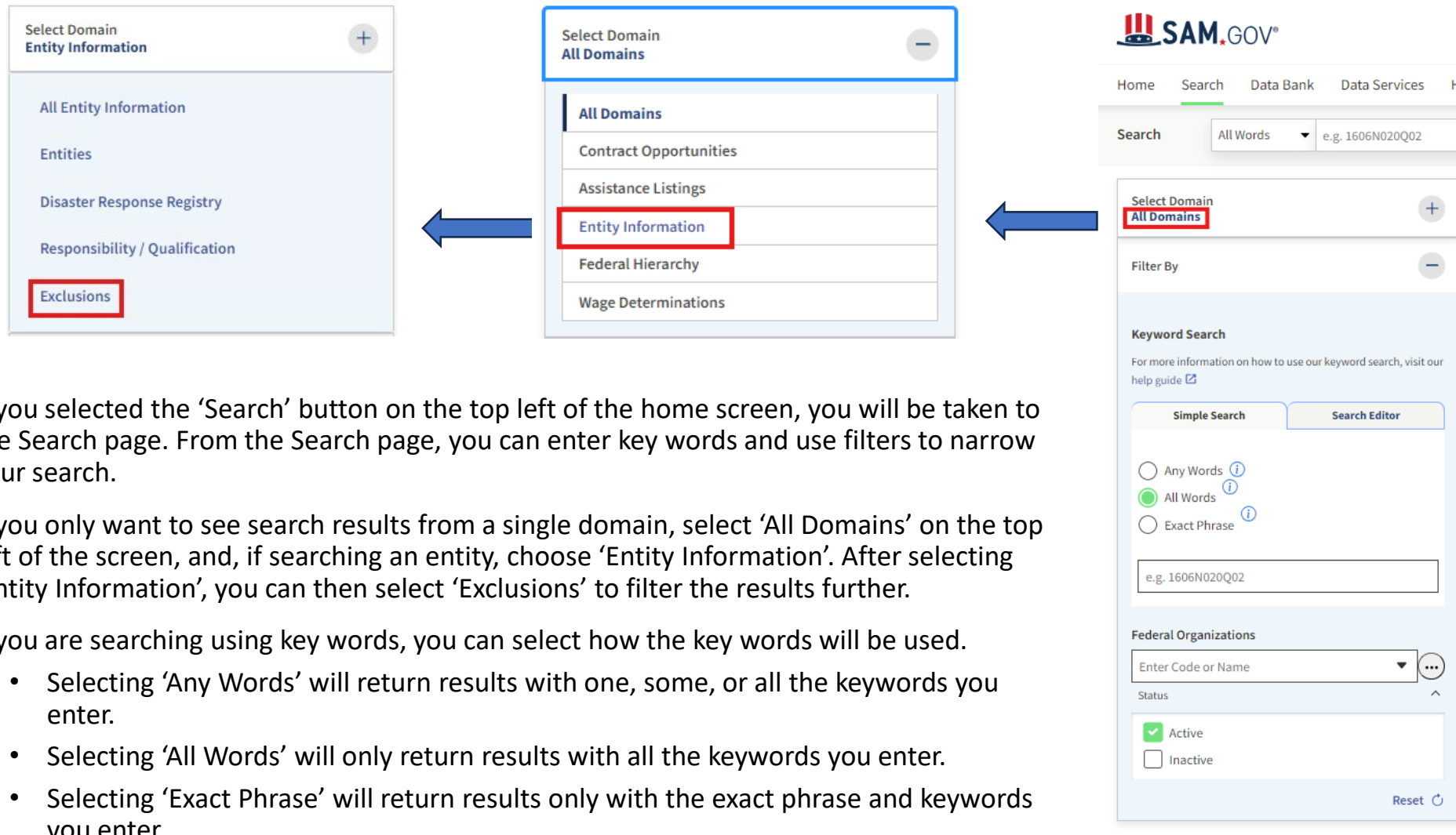
- To begin your search, you can:
 - Select 'Search' on the top left menu of the home screen.
 - Select the 'Entity Information' domain in the middle of the screen if you are searching an entity.
 - Select the 'Already know what you want to find' search bar at the bottom of the screen.
- You are required to sign into your account to search/view exclusions.



Link: [Home | SAM.gov](#)



General Services Administration (SAM.gov)

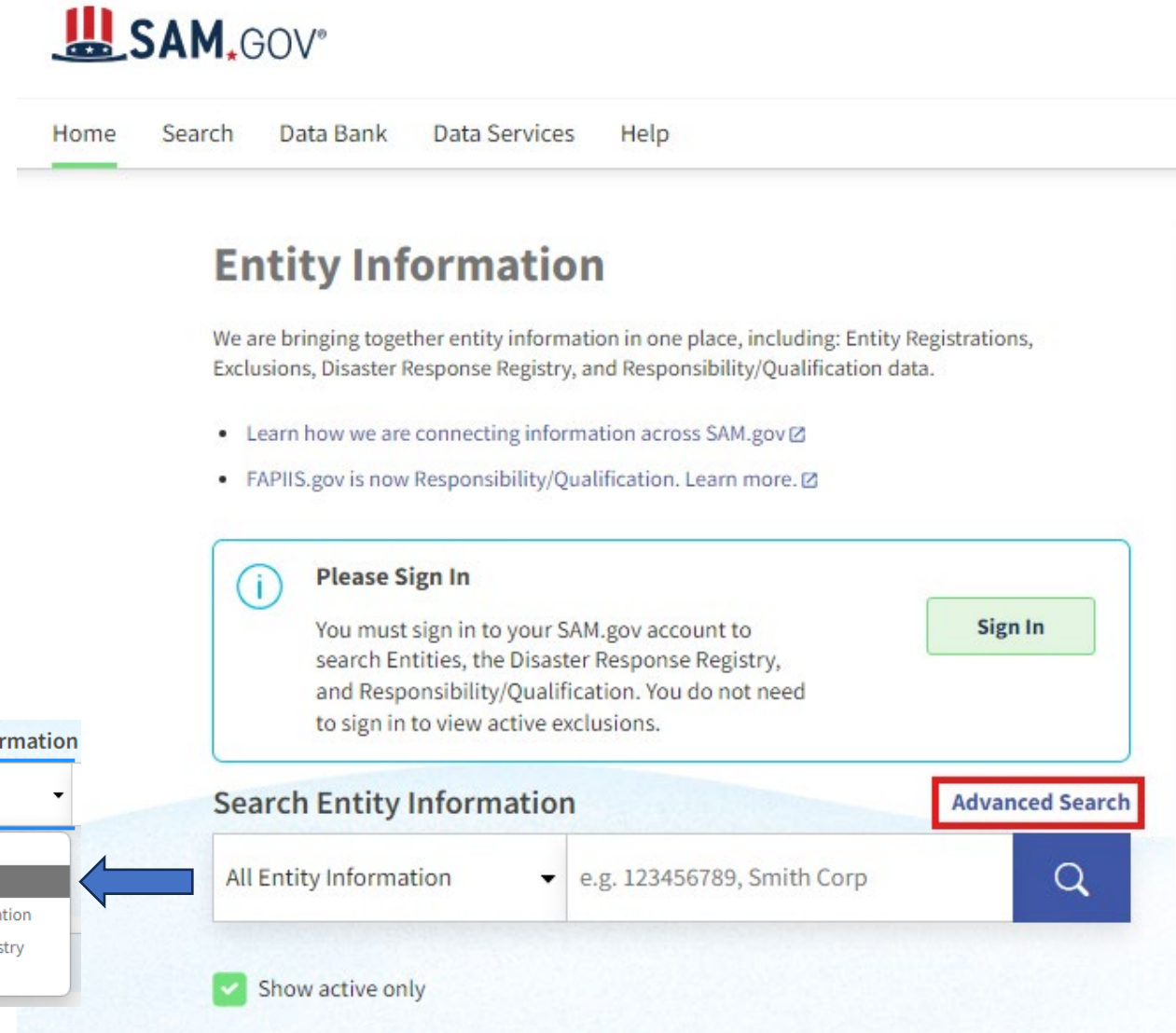
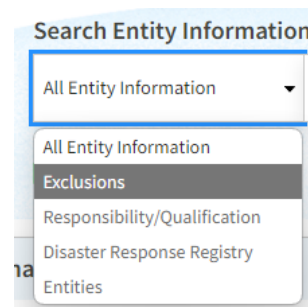


- If you selected the 'Search' button on the top left of the home screen, you will be taken to the Search page. From the Search page, you can enter key words and use filters to narrow your search.
- If you only want to see search results from a single domain, select 'All Domains' on the top left of the screen, and, if searching an entity, choose 'Entity Information'. After selecting 'Entity Information', you can then select 'Exclusions' to filter the results further.
- If you are searching using key words, you can select how the key words will be used.
 - Selecting 'Any Words' will return results with one, some, or all the keywords you enter.
 - Selecting 'All Words' will only return results with all the keywords you enter.
 - Selecting 'Exact Phrase' will return results only with the exact phrase and keywords you enter.

General Services Administration (SAM.gov)




- If you selected the 'Entity Information' domain from the middle of the home screen, you will be taken to the Entity Information page.
- From here, you can search by entering the name of the entity in the search bar. After clicking the magnifying glass in the search bar, your search results will then display in the search screen, and you can adjust the keywords / filters as needed.
- When searching from this page, the search results will only contain entity information.
- Clicking 'Advanced Search' above the search bar will take you directly to the search screen with the 'Entity Information' domain preselected. From there, you can also adjust the keywords / filters as needed.
- You can also check 'Show active only' to further filter your search results.
- You can also select the 'Exclusions' tab under 'All Entity Information' in the search bar to further filter your search results.



General Services Administration (SAM.gov)



- Once you are ready to begin your search, enter the individual's / entity's name in the search box.
- If there are **no search results**, you will receive a 'No matches found message'.
- If searching for an individual, confirm that you have searched all possible variations of the individual's name (hyphenated names, maiden names, previous married name, etc.).
- If you have searched all possible variations of the individual's name and no results are found, the individual / entity is not on the exclusion list.



No matches found

Your search did not return any results for active records.

Would you like to include inactive records in your search results?

Search inactiveGo back

General Services Administration (SAM.gov)



- If there **are search results**, verification is required to confirm whether the individual / entity is excluded. You can filter the results to show 'Active' status only.
- The individual or entity has a possible active exclusion when the results contain a **green dot** with 'Active' next to the name of the individual / entity. You can also determine whether an individual / entity has a possible active exclusion by checking the 'Termination Date' included in the search results.
- If there are multiple search results, verify all potential matches. To verify a match, click on the name of the individual / entity in the search results.
 - This will take you to the Exclusion Details page.
 - Carefully read the exclusion details to understand why the individual / entity was excluded.
 - Contact the federal agency that created the exclusion record for further information.
- **Inactive exclusions should be reviewed on a case-by-case basis.**



This page contains the exclusion details for the record matching your search criteria. There may be instances when a Firm or Individual has the same name, or a similar name, as your search criteria but is actually a different party. Read the entire record to understand why this entity was excluded and what effect this exclusion has on your decision.

To verify a potential match or obtain additional information, contact the federal agency that created the exclusion record. Contact information for the designated Agency Point of Contact (POC) is linked to the Excluding Agency name within the record. You can also navigate to the Agency Exclusion POC page within SAM Help under Exclusions Information.

Agency users with an exclusion management role may update an exclusion record to deactivate it. From the Edit Exclusion Record options, select Update, then set the Termination Date on the Exclusion Details page. Once an exclusion is inactive, it cannot be modified.

[Hide Details](#)

The screenshot shows the SAM.gov search interface. At the top, there's a navigation bar with 'Home', 'Search', 'Data Bank', 'Data Services', and 'Help'. A 'Sign In' button is in the top right. Below the navigation bar is a search bar with a dropdown menu set to 'All Words' and a search input field containing 'e.g. 1606N020Q02'. To the right of the search bar is a 'Select Criteria' button with a left arrow and the text 'Choose your filters and run your report to begin.' Below the search bar is a 'Filter By' section with a plus and minus icon. Under 'Filter By' is a 'Keyword Search' section with a link to a help guide. There are two tabs: 'Simple Search' (selected) and 'Search Editor'. Under 'Simple Search', there are three radio buttons: 'Any Words' (unselected), 'All Words' (selected, with a green dot), and 'Exact Phrase' (unselected). Below these is a search input field containing 'e.g. 1606N020Q02'. Under the search input field is a 'Federal Organizations' section with a dropdown menu and a plus icon. At the bottom is a 'Status' section with two radio buttons: 'Active' (selected, with a green dot) and 'Inactive' (unselected). A red box highlights the 'Status' section. A 'Reset' button is at the bottom right of the 'Status' section.

General Services Administration (SAM.gov)



- Providers have the option to opt out of public search for their registration details.
 - This means even if they are registered in SAM.gov, their entity registration records can not be seen from a public search.
- The County cannot require Providers to opt in to public search.
- The Suspended and Ineligible Provider list is public.
 - This means even if the individual / entity has chosen to opt out of public search for their registration details on SAM.gov, and is therefore not visible on SAM.gov, they may still be listed on the Suspended and Ineligible Provider list.
- Thus, in addition to searching SAM.gov, you should also be searching the [Suspended and Ineligible Provider List](#)

Office of Inspector General (OIG)



- You can either search for single or multiple individuals / entities.
- If searching for an individual, enter both their first and last name for the best results.
- Click 'Search'.

The screenshot shows the "Office of Inspector General" website for the "U.S. Department of Health & Human Services". The page is titled "Search the Exclusions Database". It features a search bar with the placeholder text "Report #, Topic, Keyword.." and a "Search" button. Below the search bar, there are tabs for "About OIG", "Reports & Publications", "Fraud", "Compliance", "Exclusions", "Newsroom", and "Careers". The "Exclusions" tab is selected. The main content area is titled "Search the Exclusions Database" and contains a search form. The form has a "Search For An Individual" button, which is highlighted with a red box. Below this button, there are three radio buttons: "Search For Multiple Individuals", "Search For A Single Entity", and "Search For Multiple Entities". The "Search For A Single Entity" option is selected. The form also includes input fields for "Last Name" (containing "Smith") and "(and/or) First Name" (containing "Jane"). A "Search" button is highlighted with a red box, and a "Clear" button is also visible. A "Related Content" sidebar on the right lists links to "LEIE Downloadable Databases", "Monthly Supplement Archive", "Waivers", "Quick Tips", "Background Information", and "Applying for Reinstatement".

Link:

[Search the Exclusions Database | Office of Inspector General](#)

All images on the slide are from 'How to Perform Exclusion List Screenings' Guide created by EPIC Management Compliance (2018)

Office of Inspector General (OIG)



- If there are no search results, confirm that you have searched all possible variations of the individual's name (hyphenated names, maiden names, previous married name, etc.).
- If you have searched all possible variations of the name and no results are found, the individual / entity is not on the exclusion list.

The image shows two screenshots of the "Search the Exclusions Database" web application. The top screenshot shows the search interface with "Last Name" set to "Doe" and "(and/or) First Name" set to "Jane". The "Search" button is highlighted with a mouse cursor. The bottom screenshot shows the "Exclusions Search Results: Individuals" page. A red box highlights the message "No Results were found for Doe , Jane". Below this, a yellow information icon and text state: "If no results are found, this individual or entity (if it is an entity search) is not currently excluded. Print this Web page for your documentation". A "Search Again" link is also present. At the bottom, a footer note reads: "Search conducted 3/6/2018 1:13:15 PM EST on OIG LEIE Exclusions database. Source data updated on 3/6/2018 7:54:00 AM EST."

Office of Inspector General (OIG)



- If there are search results, verification is required to confirm whether the individual / entity is excluded.
- If there are multiple results, verify each potential match.
- To verify with the individual's SSN or the entity's EIN, click 'Verify'.

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Home > Exclusions

Exclusions Search Results: Individuals ?

Results were found for

> Smith, Jane

! If the name of the individual or entity appears below, click on the underlined last name or entity name to Verify the record. If the name does not appear in the search results below, print this Web page for your documentation.

Print Search Results

<u>Last Name</u>	<u>First Name</u>	<u>Middle Name</u>	<u>General</u>	<u>Specialty</u>	<u>Exclusion</u>	<u>Waiver</u>	<u>SSN/EIN</u>
<u>SMITH</u>	JANE	A	IND- LIC HC SERV PROV	NURSE/NURSES AIDE	1128(b)(4)		<u>Verify</u>
<u>SMITH</u>	JANELLE	MARIE	NURSING PROFESSION	NURSE/NURSES AIDE	1128(a)(2)		<u>Verify</u>
<u>SMITH</u>	JANET	F	NURSING PROFESSION	NURSE/NURSES AIDE	1128(b)(4)		<u>Verify</u>
<u>SMITH</u>	JANET	A	NURSING PROFESSION	NURSE/NURSES AIDE	1128(b)(4)		<u>Verify</u>

Search conducted 3/6/2018 1:07:01 PM EST on OIG LEIE Exclusions database.
Source data updated on 3/6/2018 7:54:00 AM EST.

[Return to Search](#)

All images on the slide are from 'How to Perform Exclusion List Screenings' Guide created by EPIC Management Compliance (2018)

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- Then, enter the SSN/EIN in the search box and click 'Verify'.

Home > Exclusions

Exclusions Search Results: Verify

[Return to Search Results](#) | [Begin a New Search](#)

First Name	JANE
Middle Name	A
Last Name	SMITH
DOB	08/03/1967
NPI	0000000000
UPIN	Unknown
General	IND- LIC HC SERV PROV
Specialty	NURSE/NURSES AIDE
Address	7 TROWBRIDGE ROAD MOODUS, CT 06469-0000
Excl. Type	1128(b)(4)- LICENSE REVOCATION/SUSPENSION/SURRENDER
Excl. Date	02/19/2015
Waiver	

To verify if you have a match, please enter a Social Security Number (SSN) or Employer Identification Number (EIN) without dashes (123456789).

All images on the slide are from 'How to Perform Exclusion List Screenings' Guide created by EPIC Management Compliance (2018)

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- If the SSN/EIN do not match the individual / entity, you will receive a red 'X' and the message 'Name and SSN DO NOT MATCH' as the result.
- Repeat this process with all other search results by clicking 'Return to Search Results'.
- If the name and SSN do match, you will receive a green check mark as the result, meaning the individual / entity is on the exclusion list. **An inactive exclusion should be reviewed on a case-by-case basis.**

A screenshot of the "Exclusions Search Results: Verify" web page. The page displays a table of search results for an individual named JANE A SMITH, born 08/03/1967, with NPI 0000000000 and address 7 TROWBRIDGE ROAD, MODUS, CT 06469-0000. The exclusion type is "1128(b)(4)- LICENSE REVOCATION/SUSPENSION/SURRENDER" and the date is 02/19/2015. At the bottom, there is a "Verify" button next to a text input field containing "123456789". Below this, a large red "X" and the text "NO MATCH" are displayed, along with the message "Name and SSN DO NOT MATCH". The "Return to Search Results" and "Begin a New Search" buttons at the top are also highlighted with red boxes.

Helpful Hints



- If you have a question about a current or past sanction, you can reach out to the agency that authorized the sanction.
- Depending on the type of sanction, or HHSA's relationship with the potential provider, you can also reach out to the entity to get more information.
 - If the entity has a past sanction, you can ask for more information about the sanction, and if they received documentation that the issue was closed with the regulatory body that issued the sanction.

Helpful Hints



- Your organization may elect to contract out the EDM check responsibilities to an outside business that performs the checks on your organization's behalf for a fee.
 - Please note, neither the County nor HHSA recommend a provider or require the use of a third-party vendor for this activity.



Questions



More questions? Ask us!



Website:

www.cosdcompliance.org



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