# COMPLIANCE BULLETIN

## SUPPORTING HIGH QUALITY SERVICES THROUGH HIGH QUALITY STANDARDS

**Bulletin #2**                                          **June 14, 2006**

## *EXCLUSION AND DEBARMENT CERTIFICATION REVIEW*

As a condition of participation in federal health and social services programs, Sections 1128 and 1156 of the Social Security Act prohibits employment of, or contracting with, any individual or entity who has been excluded from participation in federal programs as a result of any offense listed in 42 USC § 1320.   Agency Policy M-4.2, "Screening for Ineligible Persons", requires the Compliance Office to perform an annual review of the sanction screening process, including an evaluation of Programs' performance of the sanction screening process.

Therefore, as part of the Agency's continuing efforts to provide quality services to clients and ensure accountability for public funds, during August and September the Compliance Office will be conducting a review the Exclusion and Debarment certifications completed by contractors on their monthly invoices, as well as a review of Program compliance with the requirement that all entities be checked once a year.  This review will involve 1) selecting a sample of contractors from each Program and verifying with the contractors the source documentation for the certification; 2) a review of  Programs' monitoring of the contractors' sanction screening process(es); and 3) a review of Programs annual monitoring of the entity's sanction status.  Prior to the review, each Executive will be provided with a list of their contractors that will be sampled along with a request for a copy of the claim for that contractor for a specified month.  At the completion of the review, each Agency Executive will be provided with a copy of the results for their Division or Region.  The final report will present the data in aggregate format only.

Thank you in advance for your assistance with this project.

For more information, please contact:

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*and your responsibility"*

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