

CATAMARAN AUDIT ALERT

HHS/OIG EXCLUSION LIST REVIEW

The Catamaran audit department is providing a review of basic information on the Medicare Part D requirements related to a contracted pharmacy's responsibility to review the list of Excluded Individuals and Entities (LEIE) maintained by the Department of Health and Human Services, Office of Inspector General (OIG) for all personnel associated with Pharmacy Services.

Please take the opportunity to educate your pharmacy staff on the importance of the audit topic presented in the alert below.

Providers are required to maintain proper policies and procedures related to training on Compliance including Fraud, Waste and Abuse. Additionally, the provider must have a policy and procedure for checking the Office of the Inspector General (OIG) List of Excluded Individuals (LEIE) and Government Services Administration (GSA) Excluded Parties Lists System (EPLS) to confirm no employee, volunteer, consultant, governing body member, or contracted individual or entity is excluded from participation in federal programs

PLEASE EDUCATE your PHARMACY STAFF on the importance of validating all employees or contractors responsible for the provision of pharmacy services, against the HHS/OIG exclusion list.

- Pharmacy should maintain a **policy and procedure** which defines the requirement and the procedure to complete the review process.
- Review is required to be completed upon **initial hiring** of any employee or contractor and at a minimum **monthly** thereafter.
- Pharmacies should **maintain documentation** including a list of all employees/contractors for whom the verification was completed and the date of completion. If verifications are conducted directly on the website documentation of the image detailing confirmation of no exclusions must be maintained and accessible for audit.
- The pharmacy is required to **remove** any employee or contractor found to be on the exclusion list immediately from any pharmacy services and **notify** the Catamaran FWA hotline at 888-625-5685.
- The **website** for review can be found at www.exclusions.oig.hhs.gov for the OIG LEIE and www.sam.gov for the GSA EPLS.

We appreciate your participation in the Catamaran provider network and hope you find the above information useful. If we may answer any questions or provide additional information, please contact the Catamaran Provider Relations department at 877-633-4701.

Thank you for your cooperation and assistance in education of the pharmacy staff.

Catamaran Pharmacy Audit and Compliance

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