



CMS requires that all First Tier, Downstream, and Related Entities (FDRs) ensure that all personnel, employees, and contracted staff involved in the administration or delivery of Medicare benefits are validated that they do not appear on the DHHS Office of the Inspector General (OIG) and General Services Administration (GSA)/System for Award Management (SAM) excluded sanction lists. **This validation must be completed prior to hire/contracting and monthly thereafter. Evidence of said validation must be saved for a minimum of ten (10) years.**

All employees and contractors, including entities, are screened prior to hire or contract effective date and monthly thereafter. As a First Tier entity of a Medicare Advantage organization, the IPA may at any point monitor or audit our downstream entities to ensure proper compliance with this process.

The DHHS Office of the Inspector General (OIG)

1. Navigate to <https://oig.hhs.gov>
2. Enter the employee or contractor name (including entities.)
3. Once available, save a screenshot of the results.
 - a. Ensure the screenshot includes the individual or entity name, date of the screening, and results.
4. Any employee or contractor, including entities, that is excluded from federal health care programs must be identified as ineligible and removed immediately.

General Services Administration (GSA)/System for Award Management (SAM)

1. Navigate to www.sam.gov
2. Enter the employee or contractor name (including entities.)
3. Once available, save a screenshot of the results.
 - a. Ensure the screenshot includes the individual or entity name, date of the screening, and results.
4. Any employee or contractor, including entities, that is excluded from federal health care programs must be identified as ineligible and removed immediately.