



TOMPKINS COUNTY COMPLIANCE PROGRAM

Fact Sheet Series - Issue No. 2 (Revised 2019)

Think Compliance First!

Exclusion Screening for Employees, Contractors, and Vendors Doing Business with Tompkins County Government

The Tompkins County Compliance Program calls for routine identification of compliance risk areas to help detect potential fraud or regulatory non-compliance. One approach to this monitoring process is the monthly screening of all employees, contractors, and vendors to ensure that they have not been involved in adverse governmental actions related to fraud or abuse of government funds, or, if applicable, have not been excluded from federally-funded healthcare programs.

What is our County Policy?

The County reserves the right not to employ or engage in a business relationship with any person or entity currently under sanction or exclusion by any duly authorized enforcement agency, unless such relationship is otherwise required by law.

Adopted in 2011, the Tompkins County Exclusion Screening Policy (Administrative Policy 11-46) recognizes federal and state requirements to ensure that employees, providers, contractors, prescribing/authorizing physicians, etc., who provide and/or perform services for or on behalf of the County have not been the subject of adverse governmental actions that might put the County at risk. Prior to employment, at the time of contract vendor/contractor negotiations, and monthly thereafter, the County will conduct exclusion checks using, at a minimum, the following sources to determine if a contractor or vendor appears on any of the following lists:

- U. S. Department of Health and Human Services, Office of Inspector General (OIG)'s List of Excluded Individuals and Entities (LEIE).
- The General Services Administration (GSA)'s Excluded Parties List System is currently available on the U.S. Government's System for Award Management (SAM) Website.
- Specially Designated Nationals (SDN) File maintained by the United States Department of the Treasury.
- Various state exclusion files that are made available to the public, such as the NYS Medicaid Fraud Database.

What is your role as a contractor or vendor providing services or products to or on behalf of Tompkins County government?

- ✓ Read the County Compliance Program Document at <http://www.tompkinscountyny.gov/tccp>.
- ✓ Read your specific contract document carefully.
- ✓ Report to the County any concerns regarding waste, fraud, or abuse.
- ✓ Ask questions or request additional information if needed.

Whom to contact if you have questions or need assistance?

Tompkins County Compliance Coordinator
 Department of County Administration
 125 East Court Street, 3rd Floor
 Ithaca, NY 14850
 (607) 274-5551

OR

County Compliance and Breach Confidential Hotline: 877-348-1396

The Hotline is equipped to handle reports from both identified and anonymous callers about any known or suspected violations of laws, regulations, or policies related to waste, fraud, or abuse of County funds and resources. The Hotline should also be used for reporting any breach of confidential, private, or personal health information.