

MM-14

**EXCLUDED CONTRACTORS AND
VENDORS FROM FEDERAL
HEALTHCARE PROGRAMS**

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POLICY:

In accordance with Federal law, Kettering Health Network will not enter into contract with any individual or entity that is currently excluded by the Office of Inspector General (OIG) and or the General Service Administration (GSA) from participation in any Federal health care program.

DEPARTMENT AFFECTED:

Applicable to all KHN departments and all individuals/vendors entering into a contract with KHN
Sponsoring Department: Corporate Integrity

DEFINITIONS:

OIG – Office of Inspector General

GSA – General Service Administration

Vendor – any individual or company that currently sells goods and/or services to, or seeks or intends to do business with the Network.

Contractor – anyone who enters into a binding agreement to perform a certain service or provide a certain product in exchange for valuable consideration, whether monetary or goods and services.

GUIDELINES:

Purpose:

To establish a policy governing Kettering Health Network's (KHN) contract agreements with individuals or vendors who are currently excluded by the Office of Inspector General (OIG) and the General Service Administration (GSA) from participation in Federal health care programs.

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Procedure:

Prior to entering into contracts with any individual or entity, those individuals with contracting authority as designated in Administrative Policy FI-01 or Supply Chain Management must verify that the contracting individual or entity does not appear on the OIG or GSA listing of excluded individuals and entities.

If any search indicates that the individual or entity is on either the OIG or GSA list of excluded individuals and entities, the contractual relationship with Kettering Health Network must be terminated immediately.

To monitor Kettering Health Network's compliance with the Federal exclusion law, Corporate Integrity will perform a quarterly search on the OIG and GSA data base for all current vendors and contractors. Supply Chain Management will perform individual searches for all new vendors and contractors that may offer services or goods to KHN subsequent to the last vendor quarterly search.

SPONSORING DEPT:	Corporate Integrity Office
DATE OF ORIGIN:	04/13/07
LAST REVIEWED:	06/11/07
DATE APPROVED:	06/11/07
APPROVED BY:	Administrative Finance Council
DATE APPROVED:	06/14/07
APPROVED BY:	KMC Executive Council
DATE EFFECTIVE:	06/14/07

Administrative Policy