

Excluded Individuals & Entities

ROWAN UNIVERSITY POLICY

Title: Excluded Individuals & Entities
Subject: Office of Compliance & Corporate Integrity (OCCI)
Policy No: OCCI:2013:C07
Applies: Rowan University
Issuing Authority: Rowan President & RowanSOM Dean
Responsible Officer: Chief Audit, Compliance & Privacy Officer
Adopted: 07/01/2013
Last Revision: 12/26/2023
Last Reviewed: 12/26/2023

I. PURPOSE

To establish a policy governing the Rowan School of Osteopathic Medicine (RowanSOM) employment of and entering into contracts with, individuals or entities who are currently excluded by the Office of Inspector General (OIG), the General Service Administration (GSA), or the New Jersey Office of the Medicaid Inspector General from participation in Federal health care programs.

II. ACCOUNTABILITY

Under the direction of the President, the Deans, Senior Vice President for Medical Initiatives and Affiliated Campuses, Senior Vice President for Administration, General Counsel, Chief Audit, Compliance & Privacy Officer, Senior Vice President for Finance, Vice President for Human Resources and the Vice President for Supply Chain Management shall ensure compliance with this policy. The Department Chairs /Directors in each School and all other Units shall implement this policy.

III. APPLICABILITY

This policy applies to **all** employees and **all** individuals/entities entering into a contract with Rowan University.

IV. POLICY

In accordance with Federal law, Rowan University will not employ or enter into contracts with any individual or entity which is currently excluded by the Office of Inspector General (OIG) and/or the General Service Administration (GSA), and/or from the New Jersey Medicaid Inspector General, (NJOMIG) disqualified/debarred provider list from participation in Federal health care programs.

V. PROCEDURE

1. Prior to hiring an individual, entering into contracts with any individual or entity, or extending clinical privileges at Rowan University the Department of Human Resources must verify that the individual or entity does not appear on the OIG or any listing of excluded parties and that the individual or entity does not appear on any disqualified/debarred provider list.
2. Prior to entering into any contracts or purchasing agreements with any individual or entity, Purchasing Services must verify that the individual or entity certifies through an ownership disclosure statement that same does not appear on the OIG or any listing of excluded parties and that the individual or entity does not appear on any disqualified/debarred provider list (see below). These listings can be accessed on the Internet in a searchable format:

- a. [OIG](#)
- b. [SAM](#)
- c. [LEIE](#)
- d. [NJOMIG](#)
- e. [PAOMIG](#)
- f. [NYOMIG](#)

3. If the above searches indicate that the individual or entity is on the [OIG](#) or any listing of excluded parties or list of excluded or disqualified/debarred individuals and entities, this individual or entity cannot be employed or have any contractual relationship with RowanSOM including the granting of clinical privileges.
4. To protect Rowan University against individuals or entities excluded or disqualified/debarred subsequent to their employment, during the duration of the contract, during the duration of the employment, or after the granting of clinical privileges such searches are performed by the Office of Compliance and Corporate Integrity (OCCI) monthly, effective October 1, 2015.
5. If it is determined that a current employee, entity with a current contract, or non-employee physician with current clinical privileges is an excluded or disqualified/debarred individual or entity, the Office of Compliance and Corporate Integrity (OCCI) must be notified immediately. The OCCI will perform an investigation to ascertain if in fact the current employee, entity with a current contract, or non-employee physician with current clinical privileges is on an exclusion or disqualified/debarred list. If it is determined that the individual and/or entity is indeed on an exclusion or disqualified/debarred list, the employment and/or contractual relationship shall be immediately terminated.
6. If a person in a supervisory capacity learns that a member of his/her staff and/or an entity being utilized is on the excluded list, he/she must notify the Office of Compliance and Corporate Integrity (OCCI) immediately. Failure to notify the OCCI may result in sanctions being imposed, up to and including termination.
7. If an individual learns that he/she is excluded or debarred, or if an entity he/she is doing business with is excluded or debarred, he/she must notify his or her supervisor and the Office of Compliance and Corporate Integrity immediately. Failure to do so will result in sanctions being imposed, up to and including termination.

VI. NON-COMPLIANCE AND SANCTIONS

Any individual who violates this policy shall be subject to discipline up to and including dismissal from the University in accordance with their union and University rules. Civil and criminal penalties may be applied accordingly. Violations of this policy may require retraining and be reviewed with employee during the annual appraisal process. The Deans of each College, Vice Presidents, and University President, with the assistance of the Department of Human Resources, will enforce the sanctions appropriately and consistently to all violators regardless of job titles or level within the University and in accordance with bargaining agreements for represented employees. Any sanction costs or fines will be borne by the Department and the Department Chair or VP will determine how these funds will be assigned.

By Direction of the President:

Signature on file

Chief Audit, Compliance & Privacy Officer