

**HEALTH SCIENCE CENTER HANDBOOK OF OPERATING PROCEDURES**

Chapter 4	General Personnel Policies	Effective:	November 2000
Section 4.4	Background Information Checks	Revised:	October 2015
<b>Policy 4.4.2</b>	<b>Sanction Checks</b>	Responsibility:	Vice President for Human Resources

## **SANCTION CHECKS**

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### **Policy**

The Health Science Center does not knowingly employ, either as a bona fide employee or an independent contractor, with or without pay, an individual or entity that is listed by a federal agency as excluded, suspended, or otherwise ineligible for participation in federal programs to hold any position or render any services for which the individual's or entity's compensation or the services rendered by the individual or entity are paid in whole or in part, directly or indirectly, by a federal health care program or otherwise with federal funds. In order to carry out this policy, the Health Science Center makes a reasonable inquiry into the status of any potential employee or independent contractor. Such a reasonable inquiry is made during the hiring process and includes at a minimum a review of the Office of Inspector General's (OIG's) Program Exclusion Report, System for Award Management (SAM.gov), General Services Administration's Excluded Parties List System (EPLS), and the thirty-five (35) State databases for the list of parties excluded from federal procurement and non-procurement programs. Monthly inquiries are conducted on all employees.

Additionally, the Health Science Center will remove from responsibility for, or involvement with, the University's federal health care program business operations any employee who becomes suspended or is proposed for exclusion during the individual's employment with the University until the resolution of such suspension or proposed exclusion. In addition, if any employee of the Health Science Center is charged with a criminal offense relating to its federal health care program business, the University is charged with a criminal offense relating to its federal health care program business, the Health Science Center will remove that employee immediately from responsibility for, or involvement with, the University's federal health care program affairs.

If any employee is convicted or debarred, the Health Science Center shall remove this individual from any position, for which the individual's salary or the services rendered by the individual are paid in whole or in part, directly or indirectly, by the federal health care programs or otherwise with federal funds. The Health Science Center shall notify OIG of each such personnel action taken and the reason therefore, within thirty (30) days of the action.

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The Health Science Center does not knowingly allow or cause to be allowed, any person convicted in local, state, or federal court of any felony involving health care matters to hold the position of director, officer, or manager at the University, or any of its agents through either an employment agreement or an independent contract.

Should the Health Science Center discover that it has employed such an individual as described above, the University will take steps to cure the problem within thirty (30) days.

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