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Owner Deanna Nicolozakes:
Director,
Compliance &
PMG Compliance
Officer

Area Compliance

Applicability Privia Health and
All Markets

Exclusion Monitoring

1. Purpose.

To ensure that no individual or entity that is excluded from participation in a federal health care program is hired, credentialed or otherwise engaged by a Privia entity.

2. Scope.

This policy applies to the officers, directors, vendors and workforce of (1) Privia Health Group, Inc., its subsidiaries, and affiliates (collectively "Privia"), (2) any entity for which Privia is contractually obligated to manage such entity's compliance program, including Non-Owned Medical Groups, and (3) Care Centers who access Privia's Technology Platform.

3. Definitions.

- "Corporate employee" shall mean any individual employed or paid by Privia Health.
- "Exclusion Monitoring System" shall mean the application or tool selected by the respective entity to complete the required exclusion checks as defined in this policy.
- "Workforce" shall mean employees, volunteers, trainees, students, and any other person whose conduct, while performing work for Privia or an affiliated Care Center, is under the direct control of Privia or the Care Center, regardless of whether, or by whom, they are paid and regardless of whether they are full-time, part-time, permanent or temporary.

4. Policy

The Office of Inspector General (OIG) excludes from participation in all Federal health programs

individuals and entities convicted of the following types of criminal offenses: Medicare or Medicaid fraud, as well as any other offenses related to the delivery of items or services under Medicare, Medicaid, SCHIP, or other State health care programs; patient abuse or neglect; felony convictions for other health care-related fraud, theft, or other financial misconduct; and felony convictions relating to unlawful manufacture, distribution, prescription, or dispensing of controlled substances.

Privia shall not knowingly hire, credential or otherwise engage any individual or entity that is currently debarred, excluded, suspended or otherwise deemed ineligible to participate in a federal health care program or in a federal procurement or non-procurement program; has been convicted of a criminal offense related to the provision of health care items or services or to health care fraud; does not have the requisite professional license, registration or certification, or is otherwise not in good standing with the relevant state authorities to provide such services as the individual or entity is being hired, credentialed or otherwise engaged to provide.

All individuals engaged by a Privia entity will be checked for exclusions at hire and monitored monthly thereafter. Exclusion checks will be conducted by checking Federal and State Exclusion lists which include:

- OIG-List of Excluded Individuals/Entities (LEIE) - [OIG LEIE](#)
- System for Award Management (SAM) - [SAM.gov](#)
- All available State Medicare/Medicaid Exclusion Lists (see attached State Medicaid Exclusion Lists)

Any Corporate employee or individual employed by a Privia entity who is identified as excluded is subject to immediate termination of employment. A thorough review will be conducted for any Corporate employee or individual employed by a Privia entity who is identified as potentially excluded on any State Exclusion List, regardless of the state they currently work in or reside.

Any subcontractor rendering services to Privia Health, its subsidiaries and affiliates, or any non-owned Privia Medical Group entity (e.g. Privia care centers) is responsible for checking their own workforce, vendors and any provider who may not be credentialed by Privia for exclusions at hire and monitoring for them monthly thereafter by checking all Federal and State Exclusion lists listed above. Anyone found on the exclusion lists must be immediately removed from any work related (directly or indirectly) to federal health care programs and notify the Compliance Department. Such Privia subsidiaries or affiliates are responsible for retaining documentation substantiating all checks and resolution of any potential matches. Documentation must be retained and produced for audit upon request.

5. Procedure.

1. Prior to commencement of employment, workforce members are checked against Federal and State Exclusion Lists as part of the general background check process.
2. All providers are checked against all Federal and State Exclusion Lists at time of initial credentialing and monitored thereafter.
3. All workforce members in all Privia entities and active Corporate employees are scanned on a monthly basis against all Federal and State exclusion lists.

1. Each month, a list of new hires/terminations of Corporate employees and Privia entity workforce members is uploaded to the Exclusion Monitoring System. Terminated individuals are removed from future monitoring.
 2. Monthly scans of the OIG LEIE, SAM and all State Exclusion lists are conducted through the Exclusion Monitoring System.
 3. The Compliance department is immediately alerted to any positive or potential excluded individuals. Compliance will determine the appropriate action based on the circumstances of the alert(s) and notify Legal and management accordingly.
 4. Documentation of all searches is maintained by the respective department or entity (Credentialing, Procurement, Care Center or Compliance). Detailed reports with results of scans are available as needed.
4. OIG and SAM checks on all vendors are conducted by the Procurement (Finance) Team and stored as part of the vendor's contract file. All checks are conducted using the vendor name, owner name and the owner's SS# or the company TIN#.
 5. Any subcontractor rendering services to Privia Health, or its subsidiaries and affiliates, or any Privia Medical Group entity (e.g. Privia care centers) should maintain the above processes such that the requirements of this policy are met and documentation readily available for audit.
 6. All documentation related to this policy shall be retained for not less than ten (10) years.

Attachments

 [State Medicaid Exclusion Lists.pdf](#)

Approval Signatures

Step Description	Approver	Date
Chief Audit & Compliance Officer Approval	Dana Fields: Chief Audit & Compliance Officer	07/2024
Compliance & Audit Leadership #1	Deanna Nicolozakes: Director, Compliance & PMG Compliance Officer	07/2024
	Deanna Nicolozakes: Director, Compliance & PMG Compliance Officer	07/2024