Integral Healthcare Solutions

Exclusion Screening Program Consulting: OIG LEIE, SAM.gov and State Medicaid Lists

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What to have ready

Each item ties to the OIG bulletin (May 8, 2013), the eCFR (current as of September 30, 2026) or CMS guidelines.

- A roster of employees and contractors by category. OIG says providers "should determine whether or not to screen contractors, subcontractors, and the employees of contractors using the same analysis that they would for their own employees" (OIG bulletin [https://oig.hhs.gov/documents/root/10422/Special%20Advisory%20Bulletin%20on%20the%20Exclusion%20from%20Participation%20in%20Federal%20Health%20Care%20Programs.pdf]).
- Your current screening schedule, to compare with OIG's monthly recommendation (OIG bulletin [https://oig.hhs.gov/documents/root/10422/Special%20Advisory%20Bulletin%20on%20the%20Exclusion%20from%20Participation%20in%20Federal%20Health%20Care%20Programs.pdf]).
- Saved search results. OIG says providers "should maintain documentation of the initial name search performed (such as a printed screen-shot showing the results of the name search) and any additional searches conducted" (OIG bulletin [https://oig.hhs.gov/documents/root/10422/Special%20Advisory%20Bulletin%20on%20the%20Exclusion%20from%20Participation%20in%20Federal%20Health%20Care%20Programs.pdf]).
- Records of how past possible matches were resolved. The LEIE download files omit SSNs, so "you'll need to use the Online Search to verify specific individuals and entities" (OIG LEIE [https://oig.hhs.gov/exclusions/exclusions_list.asp]).
- Your screening vendor's contract and reports, if you use one (OIG bulletin [https://oig.hhs.gov/documents/root/10422/Special%20Advisory%20Bulletin%20on%20the%20Exclusion%20from%20Participation%20in%20Federal%20Health%20Care%20Programs.pdf]).
- Contracts with payers or plans that impose screening duties, including Medicare Advantage or Part D FDR terms (section 50.6.8 [https://www.cms.gov/regulations-and-guidance/guidance/manuals/downloads/mc86c21.pdf]).
- The list of state Medicaid programs you bill or contract with.
- Your current written screening policy, if any, and who owns it.