
EXCLUSION SCREENING GUIDANCE

**A DETAILED REVIEW OF SANCTIONCHECK'S
RULE-OUT RULES**

Contents

Purpose	2
Rule-Out Rules Overview	2
Anatomy of a Full Name	2
Full Name Types.....	2
Ignore Noise	2
Statuses.....	3
The Null Hypothesis & Error Types	3
Rule-Out Rules: Individuals/Physicians.....	4
100% Rule	4
Nick Name Rule.....	4
Middle Name Rule	4
Gender Rule	5
Male Last Name Rule	5
Transposed Name Rule	5
Double Last Name Rule.....	6
Hispanic Name Rule	6
Maiden Name Rule	7
Rule-Out Rules: Vendors.....	7
Exact Match Rule	7
State Rule.....	8
Rule-Out Rules: Additional.....	8
Date of Birth Rule.....	8
National Provider Identification (NPI Number) Rule	8
Medical License Rule.....	8
Additional Search Features.....	9
System for Award Management (SAM) Rules.....	9
Chain Rules.....	11

Purpose

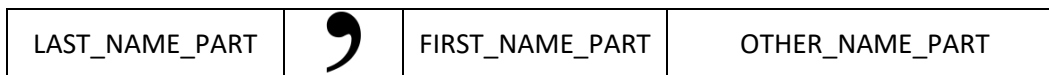
The purpose of this document is to provide an overview of the rule-out rules used in the exclusions screening process. These rules intend to provide clear guidance on the types of potential matches we will likely be presented with in the SanctionCheck system.

Rule-Out Rules Overview

Anatomy of a Full Name

An understanding of name part anatomy is a critical foundation for the rule-out rules in general and this document in particular.

The comma in a name will serve as an ‘anchor point’. A name or names to the *left* of the comma represent an individual’s surname (last name) or names. The first name to the *right* of the comma represents the individual’s given name (first name), followed by the individual’s middle name, middle initial, or other names. The illustration below where the different name part areas reside:



Full Name Types

Full names can come in many forms. Below is a list of several of the most common we will see during our review process.

- LastName , FirstName
- LastName, FirstName MiddleName
- LastName, FirstName MaidenName
- LastName, FirstName M.I.
- Hyphenated-LastName, FirstName
- Hyphenated-LastName, FirstName MiddleName
- Hyphenated-LastName, FirstName M.I.




Ignore Noise

When reviewing potential matches it is important to ignore certain “noise” in the name, such as suffixes and salutations for individuals, and business. SC5 focuses on full name parts only, and ignores these in its algorithm.

Employees/Physicians	Jr., Sr., III, MD, DO, Mrs., etc.
Vendors	Inc., LLC, Co., DBA

Statutes

The table below outlines the possible statuses of matches in SanctionCheck 5. These statuses and their associated icons are used throughout this document to help illustrate the Rule-out Rules.

Status	Explanation	Icon
Ruled Out	<i>SearchName and SanctionName are not a match</i>	
Possible Match	<i>SearchName and SanctionName might be a match</i>	
Confirmed Match	<i>SearchName and SanctionName are a match</i>	

The Null Hypothesis & Error Types

The goal during the exclusion review process is to avoid all errors, and be accurate in each decision that is made. Thus an understanding of the types of errors that exist can provide a helpful framework as we review the Rule-out Rules below.

In science and statistics, the null hypothesis is a general statement or default position that there is no relationship between two things. The primary task of the scientist then is to create tests to systematically either reject or confirm the null hypothesis with the highest level of certainty possible.

We can carry this framework forward into our exclusion process to generate our own null hypothesis, namely that “the SearchName and the SanctionName are not a match”. Our central task in our exclusion screening is to essentially “test” (accept, reject, or disprove) the aforementioned null hypothesis to determine with certainty whether a match exists between a search and SanctionName.

In hypothesis testing:

- a Type I Error represents a “false positive” (rejecting the null hypothesis when it’s true), which is where a name is deemed a “Confirmed Match” in error;
- whereas a Type II Error (failing to reject a false null hypothesis) represents a “false negative”, which is where a name is “Ruled Out” in error.

Put another way, Type I Error is to falsely infer the existence of something that is not present, while a Type II Error is to falsely infer the absence of something that is actually present. Again, with the “something” in our example corresponding to a match.

You will see that the majority of our focus during the review process is avoiding Type II errors. This is because we want to first make sure that we don’t miss anything. This is not to say that Type I errors are not important to avoid, but rather that a proper exclusion screening program will naturally eliminate them. For example, if, due to incomplete information from the sanctioning body, an individual is still a “Potential Match” (as opposed to a “Confirmed Match”) at the end of the process, a proper exclusion screening program would provide the opportunity for that individual to sign an affidavit attesting to whether they are the sanctioned individual or not. This final step eliminates that Type I Error risk.

Rule-Out Rules: Individuals/Physicians

A firm grasp on rule-out rules allows for more efficient review of potential matches, and consistent application of them helps to reduce risk and exposure.

The corresponding name part matches between SearchName and SanctionName in the first example for each Rule-Out Rule below will be highlighted to help identify the pattern.

100% Rule

If 100% of the SearchName is contained in the SanctionName, or vice versa, the name should be marked as a potential match (subject to the Male Last Name Rule below).

We can see in the first example that both the SearchName and the SanctionName are each 100% contained in the other, as they are equivalent. In the second example, we can see that 100% of the SearchName (Henry, Robert) is contained within the corresponding SanctionName (Henry, Robert Michael)

SearchName	Sanctioned Name	
Johnson, Gregory	Johnson, Gregory	⚠
Henry, Robert	Henry, Robert Michael	⚠

Nickname Rule

Nicknames can determine if a name is possible match. We can see in the first example *Will* is a common nickname for *William*, so to avoid a Type II error, we would flag this match.

SearchName	Sanctioned Name	
Smith, William J.	Smith, Will J.	⚠
Henry, Robert	Henry, Rob	⚠
Warren, Pamela	Warren, Pam	⚠

Middle Name Rule

Middle names provide much information value in the review process. Because it is not uncommon for individuals to go by their middle names, we need to consider First and Middle Names as potentially interchangeable. You can see in the first example, ruling out the SanctionName could produce a Type II error because *Christopher Robert Jones* could simply go by *Robert*, so we would flag that match.

In the second example, we can see we applied the Nickname Rule from above in conjunction with the Middle Name rule, which equates *Angelica* to the nickname *Angel*. Again, to avoid a Type II Error, this would be flagged.

In the third example, we can use the middle name to confirm the null hypothesis (that “there is not a valid match between the search and SanctionName”) by recognizing that the middle name *Jacob* does not equate to *Joseph*, thus, the name can be ruled out.

SearchName	Sanctioned Name	
Jones, Christopher Robert	Jones, Robert *	⚠
Dorsey, Danielle Angelica	Dorsey, Angel *	⚠

SearchName	Sanctioned Name	
Jones, Jeremiah Jacob	Jones, Jeremiah Joseph	✓
Denton, Charles B	Denton, Charles Alfred*	✓
Jones, Jasmine Nicole	Jones, Nicole *	⚠
Johnson, Alexandria Michele	Johnson, Michele *	⚠

Gender Rule

Because the exclusions screening process is one that must succeed in the framework of incomplete information and data (due to poor agency/sanction data quality or incomplete data from a company's internal HR system), certain common sense assumptions must be made during the review.

The Gender Rule is a rule based on such an assumption. Here, we differentiate between male and female names. If we are unable to differentiate and make a reasonable determination about the null hypothesis, we will flag the name as a possible match.

SearchName	SanctionedName	
Sims, Patricia	Sims, Patrick	✓
Simmons, Daniel	Simmons, Danielle	✓
Roberts, Christine	Roberts, Christian	✓
Simmons, Dana	Simmons, Dana Richard	⚠
Roberts, Alex	Roberts, Alex	⚠

Male Last Name Rule

This rule assumes that men will retain their last name throughout their lives, thus, if the matching Last Name is in different positions relative to the comma in the SearchName and SanctionName, it can be ruled out.

We can see in the first example below that while 100% of the Search name is contained within the SanctionName (100% Rule), because this is clearly a male's name, the position of the last name needs to be considered. Here, *Simmons* is in the Last Name position within the SearchName, while *Simmons* is in the Middle Name position in the SanctionName, so we can rule it out.

SearchName	SanctionedName	
Simmons, Daniel	Brown, Daniel Simmons	✓
Lee, Robert	James, Robert Lee	✓
Morgan, David	Scott, David Morgan	✓

Transposed Name Rule

This rule assumes that an individual's First and Middle names will not be switched, so for a valid match to be present between a SearchName and SanctionName that have both First and Middle names present in both, the First and Middle Names need to be in the exact same order.

We can see on the first example, all name parts in the SearchName are present within the SanctionName, however, the First and Middle names are switched, so we confidently confirm the null hypothesis and would rule that name out.

SearchName	SanctionName	
Cummings, Jennifer Lee	Cummings, Lee Jennifer	✓
Scott, David Morgan	Scott, Morgan David	✓
Davidson, Marissa Ann	Davidson, Ann Marissa	✓

Double Last Name Rule

Because there is a wide variety of ways that individuals handle last names, influenced by family tradition, culture, etc. For example, a child may be given both their parents' last names at birth, but may only go by their father's name in official capacities.

Thus, if a SearchName has a double or hyphenated last name, and one of those names is in the Last Name position in the SanctionName, we should flag as a match to avoid Type II errors.

In each example below, you will see that given the presence of one of the double last names from the SearchName within the last name position in the corresponding SanctionName, we cannot confirm the null hypothesis with certainty, so each would be flagged as a possible match.

SearchName	SanctionName	
Smith Calhoun, James	Smith, James	⚠
Smith Calhoun, James	Calhoun, James	⚠
Harris - James, Daniella	Harris, Daniella	⚠
Harris - James, Daniella	James, Daniella	⚠
Brown - Jones, Samuel	Brown, Samuel	⚠

Hispanic Name Rule

The U.S. Census Bureau defines the ethnonym Hispanic to refer to "a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race". Often when conducting our exclusions review, we encounter Hispanic names, and it is important to understand some of the history around traditional Hispanic naming conventions.

Often, Hispanic individuals will have hyphenated last names. These two surnames are ancestral, with the father's name followed by the mother's name. A good example is the name "Ernesto Escobar Vega", which uses two surnames – Escobar and Vega – as his legal name, with *Escobar* coming from his father, and *Vega* coming from his mother.

While this naming convention is the rule for most Spanish-speaking countries, it becomes the subject of confusion when these individuals come to the United States. Using our example above, many Hispanics will hyphenate to become "Ernesto Escobar-Vega", so that others know that *Escobar* is not a middle name, but is rather a surname, as the middle name concept is generally foreign to most Hispanic cultures. This can become further complicated when a Hispanic woman marries a Hispanic man and she keeps her maiden name as part of her new married name. Another complication can come from the frequency of compound first names within people of Hispanic origin.

With all that background established, this rule is relatively simple: Double or hyphenated Hispanic male and female names can be anywhere in the name except for the first position.

The 4th example below is a good representation of this rule. As we can see, *Rosaria* and *De Casa* are a valid match, as each are in the appropriate positions (Last name versus first name), respectively, however, *Lopez* in the SearchName is in the first name position, as opposed to *Lopez* being in the last name position within the SanctionName, thus we can rule it out.

SearchName	SanctionName	
Gonzales Diaz, Diego De Sala	De Sala, Diego	⚠
De Jesus - Lopez, Angel Rodriguez	Angel De Jesus	⚠
Hernandez De Casa-Martinez, Juan Antonio	Hernandez Martinez, Juan Antonio	⚠
De Casa, Lopez Rosaria	Lopez De Casa, Rosaria	✔
Del Grio Mendez, Lupita Sanchez	Del Grio Sanchez, Mendez	✔

Maiden Name Rule

The Maiden Name rule addresses the phenomenon of women taking their husband’s surname after marriage, while retaining their Maiden Name as their Middle Name. Thus, female names with the last name in the middle name position should be flagged as possible matches.

In each of the examples below, we can see the potential for the SanctionName to be a “maiden name” version of the SearchName, which means we cannot with certainty reject the null hypothesis, and will thus flag the names as potential matches.

SearchName	SanctionName	
Henderson, Carlie Jones	Jones, Carlie*	⚠
Nickerson, Brenda Cammon	Cammon, Brenda*	⚠
Matthews, Veronica Bates	Bates, Veronica*	⚠

Rule-Out Rules: Vendors

Exact Match Rule

Vendors that are entity named (as opposed to individual style names, e.g., Acme Co.) should be ruled out if the Searchname and the SanctionName are not exact matches.

We can see in the below examples that we can confirm the null on the basis of this rule and confidently rule these names out.

SearchName	SanctionName	
American Family Health	American Health	✔
Highhill	Highhill Hospital Network	✔
AAA Healthcare Inc.	AAA Group Healthcare, Inc	✔

State Rule

Vendors with the same name in different states can be ruled out.

SearchName	SanctionName	
American Family Health – FL	American Family Health – OH	✓
Highhill Hospital Network – DC	Highhill Hospital Network – WA	✓
AAA Group Healthcare Inc. – CA	AAA Group Healthcare, Inc – ID	✓

Rule-Out Rules: Additional

These additional rule out rules address focus on utilizing meta data a set of data that describes and gives information about other data.

Date of Birth Rule

If the name is a possible match and the DOB (Date Of Birth) matches, names will be flagged as confirmed.

SearchName	SanctionName	
Fletcher, Darius Devizen – 10/25/1985	Fletcher, Darius – 10/25/1985	✗
Jenkins, Darrell Monroe – 2/5/1957	Jenkins, Darrell – 2/5/1957	✗
Reese, Susan Elaine – 12/15/1988	Elaine, Susan – 12/15/1988	✗

National Provider Identification (NPI Number) Rule

If the names are the same, but the NPI (National Provider Identification) is different, rule out. If the names do not match exactly, but the NPI does match, we will flag this as a confirmed match. NPI's are distributed to each medical personnel only once. They keep the same NPI number throughout their medical career.

SearchName	SanctionName	
Jones, Jan – 1435998746	Jones, Jan – 1568916543	✓
Stackhouse, Jason Edwin – 1594562544	Stackhouse, Jason Edwin – 124957369	✓
Eddington, Daryl Monroe – 1795842569	Eddington, Daryl Monroe – 1358741596	✓
Marquel, David Jones – 1597532581	Jones, David – 1597532581	✗
Marin, Jessica Delouth – 1654123214	Marin, Jessica Ray – 1654123214	✗

Medical License Rule


When names are provided with license numbers, as long as the actual numbers match, these names will be flagged as Confirmed Match. Ignore the leading letters:

SearchName	SanctionName	
Arrington, David – A65987	Arrington, David – MS65987	✗
Morgan, Lisa Yvette – ID25632	Morgan, Lisa – ID25632	✗
Williams, Dominique LaShay – S8521476541	Williams, LaShay – 8521476541	✗

Additional Search Features

More rule out information can be obtained using additional search features.

Some sanctioning agencies provide a website to help verify the identity of a potential sanctioned individual or vendor. To access the website, click on the eyeball next to the sanctioned name or vendor.

Rank	#	Sanction Name					DOB	NPI	Agency	City	State	Exclusion	Actions
0	0	System for Award Management											
90	1	ADAMS-PULEO, LISA A							HHS	MANSFIELD CENTER	CT	4/20/2011	
90	2	ADAMS, LISA DIANNE							HHS	POLLOK	TX	6/18/1998	
90	3	ADAMS, LISA DIANNE							OPM	POLLOK	TX	8/31/1998	
90	4	ADAMS, LISA MARIE							HHS	SPENCER	IN	12/20/2009	

Clicking here will bring up a back page (additional information), at the bottom of which has a link for the NPI look-up site and the sanctioning website, which when selected, will bring up the site for the sanctioning agency.

Sanction Detail

Search Data	
Name:	Adams, Lisa
Date of Birth:	5/20/1972
City:	North Augusta
Notes:	
NPI:	
State:	North Augusta
SSN / TIN:	

Sanction Entity Detail

Database:	SAM	Status:	Pending Review	SAVE
Sanctioned Name:	ADAMS, LISA DIANNE			
Date of Birth:				
NPI Number:				
License:				
City:	POLLOK	State:	TX	
Sanction Date:	6/18/1998	Inactive Date:		
SSN/TIN:		Rule Out Link:		
Field Name	Value			
Termination Date	Indefinite			
SAM Number	S4MR3NORM			
CT Code	Z1			
CAGE				
Classification	Individual			
Exclusion Program	Reciprocal			
Country	USA			
Record Status				
Exclusion Type	Prohibition/Restriction			
Zip Code	75969			
DUNS				
Additional Comments	Excluded by the Department of Health and Human Services from participation in all Federal health car			
Cross-Reference				
First	LISA			
Middle	DIANNE			
Last	ADAMS			
Name				
Creation Date	6/16/1998			
SUFFIX				

Links
Verify Match
Data Source: [https://www.sam.gov/SAM/pages/public/extracts/samPublicAccessData.jsf]
NPI Look-up

System for Award Management (SAM) Rules

SAM (The System for Award Management) is the federal government's consolidating listing of individuals and businesses that do business with the government. It posts a list of all problem entities that companies should not do business with when contracted with different agency programs.

Each government agency is responsible for posting information about entities it sanctions. For example, the Department of Health and Human Services (HHS) oversees the federal Medicaid program via its Office of the Inspector General (OIG). OIG is able to rule out the search name when a DOB is provided. So the OIG posts new sanctions on SAM, and any time a sanction appears on SAM under the listing HHS

and OPM (Office of Personal Management) there should be a related sanction on the OIG. If OIG does not return a sanctioned name, but HHS and OPM return one, rule the name out.

Single Review - adams, lisa(187413)

Search Data
 Name: adams, lisa
 Unique Identifier: 0
 Date of Birth: 5/20/1972
 SSN / TIN: 250254905
 Notes:

City, State:
 UPIN:
 NPI:
 License:

Search Status: Pending Review
 Rule Out Reason:
 Rule Out Notes:
 Customer Rule Out Rules

COMPLETE
 SAVE PROGRESS

Rank	#	Sanction Name				DOB	NPI	Agency	City	State	Exclusion	Actions
0	0	System for Award Management										
90	1	ADAMS-PULEO, LISA A						HHS	MANSFIELD CENTER	CT	4/20/2011	
90	2	ADAMS, LISA DIANNE						HHS	POLLOK	TX	6/18/1996	
90	3	ADAMS, LISA DIANNE						OPM	POLLOK	TX	8/31/1996	
90	4	ADAMS, LISA MARIE						HHS	SPENCER	IN	12/20/2009	

In the above example a DOB is provided. There are no OIG sanctions. Therefore, the HHS and OPM sanctioned names can be ruled out.

Single Review - Adams, Lisa (187422)

Search Data
 Name: Adams, Lisa
 Unique Identifier: 0
 Date of Birth:
 SSN / TIN: 250254905
 Notes:

City, State:
 UPIN:
 NPI:
 License:

Search Status: Pending Review
 Rule Out Reason:
 Rule Out Notes:
 Customer Rule Out Rules

COMPLETE
 SAVE PROGRESS

Rank	#	Sanction Name				DOB	NPI	Agency	City	State	Exclusion	Actions
0	0	Office of Inspector General										
90	1	ADAMS-PULEO, LISA A				9/9/1959			MANSFIELD CENTER	CT	4/20/2011	
90	2	ADAMS, LISA DIANNE				3/28/1968			POLLOK	TX	6/18/1996	
90	3	ADAMS, LISA MARIE				12/2/1968			SPENCER	IN	12/20/2009	
0	0	System for Award Management										
90	1	ADAMS-PULEO, LISA A						HHS	MANSFIELD CENTER	CT	4/20/2011	
90	2	ADAMS, LISA DIANNE						HHS	POLLOK	TX	6/18/1996	
90	3	ADAMS, LISA DIANNE						OPM	POLLOK	TX	8/31/1996	
90	4	ADAMS, LISA MARIE						HHS	SPENCER	IN	12/20/2009	

In the above example a DOB is not provided with the search name. OIG sanctions appear when a DOB is not provided.

Chain Rules

We can apply the chain rule to a sanctioned name or vendor that has been sanctioned by different agencies by comparing additional information, such as Exclusion date, city and state or NPI's.

In the following example the sanctioned name "James B Brown" can be chained with SAM, OIG and Tennessee Disciplinary Actions agencies.

Search Data
 Name: Brown, James
 Unique Identifier: 0
 Date of Birth:
 SSN / TIN:
 Notes:

City, State:
 UPIN:
 NPI:
 License:

Search Status: Pending Review
 Rule Out Reason:
 Rule Out Notes:
 Customer Rule Out Rules

COMPLETE
 SAVE PROGRESS

Rank	#	Sanction Name				DOB	NPI	Agency	City	State	Exclusion	Actions
0	0	System for Award Management										
90	1	BROWN, NELSON JAMES						DOJ	BEAUMONT	TX	3/22/2011	
100	2	BROWN, JAMES						DOJ	GRAND PRAIRIE	TX	3/29/2011	
100	3	BROWN, JAMES 3RD						DOJ	PAHRUMP	NV	3/24/2015	
100	4	BROWN, JAMES B						OPM	MEMPHIS	TN	2/16/2005	
100	5	BROWN, JAMES E.						OPM	EAST ORANGE	NJ	11/30/1993	
100	6	BROWN, JAMES E.						HHS	EAST ORANGE	NJ	11/30/1993	
0	0	Office of Inspector General										
100	1	BROWN, JAMES B				7/12/1960			MEMPHIS	TN	12/20/2004	
100	2	BROWN, JAMES E				2/10/1949			EAST ORANGE	NJ	9/6/1993	
90	3	BROWN, JAMES EDWARD				7/2/1958			PHOENIX	AZ	8/20/2007	
90	4	BROWN, JAMES JOSEPH				9/21/1939			ST CHARLES	MO	9/11/1996	
90	5	BROWN, JAMES JOSEPH				2/25/1953			DELRAY BEACH	FL	1/30/1997	
100	6	BROWN, JAMES L							ONEONTA	AL	7/30/1986	
100	7	BROWN, JAMES M				12/22/1943			HENDERSONVILLE	TN	7/18/2002	
0	0	Texas Exclusions Database										
100	1	Brown, James E									8/20/2007	
100	2	Brown, James W									5/24/2002	
0	0	Alabama Suspended Providers List										
90	1	Brown, James L, Pharmacist						Medicare			8/16/1986	
0	0	New York Medicaid Exclusions List										
100	1	BROWN, JAMES P									7/14/2014	
0	0	Tennessee Disciplinary Actions										
100	1	James B. Brown							Memphis, TN			
100	4	James Brown							Dr, Hendersonville, TN			

Thank You for Your Interest In this Whitepaper

If you found any of the subject matter in this document interesting and you have more questions about our sanction screening process, please reach out to us via social media or on our website. Let us know if you liked this content or if it has left you scratching your head and asking, "What did I just read?"

The subject matter can be dense for the unprepared, but details like rule-out rules matter to the big picture of an organization, whether it is a bank screening the OFAC database for sanctioned entities or a health system screening the names of new hires.

Interested in SanctionCheck?

Reach Out To Us

www.complianceline.com

sales@complianceline.com

800-859-8840

About ComplianceLine

For over 20 years ComplianceLine has been the premier provider of ethics and compliance solutions by putting clients first and prioritizing their needs through selfless service.

ComplianceLine's continuous improvement culture and the pursuit of quality over short term profit affords clients the industry's best tools in assisting the identification of unethical, illegal and questionable behavior in pursuit of its mission: to improve organizations by providing leaders who care with actionable information. The ComplianceLine team provides specialized helpline and sanction screening services in 50,000 locations worldwide through highly trained, tenured, and caring compliance-minded professionals focused on improving the lives of our clients through excellent service. ComplianceLine serves over 6,000,000 people, with clients including many of the largest healthcare and higher education organizations in the world.