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When a match arises, the compliance team must be able to take several more steps:

- Investigate and confirm whether the employee is indeed an excluded party;
- Determine appropriate next steps, such as termination;
- Investigate potential misconduct such as fraud, kickbacks, or patient harm

## Reasons to Perform Screening

- **It's a compliance requirement**
- **It reduces regulatory enforcement risk**
- **It protects patients from harm**
- **It protects the business from litigation**
- **It supports an ethical workforce**

## Use Program Resources Wisely, So You Can Take Action

Given everything else that should happen after a screening match, that drives up the importance of streamlining the screening process itself. The more automated and error-proof screening is, the less burdened your compliance team is with mundane tasks such as data search or list maintenance. Your team can instead focus on risk analysis, investigation, and remediation of other problems that screening brings to light. The result: better use of compliance resources **and** more effective compliance overall.



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## Integrate Screening Into the Rest of Compliance

Sanction screening is a crucial compliance duty, but it is still only one part of a larger compliance program. Compliance officers should ensure that screening doesn't happen in a vacuum, but rather, informs and supports other parts of the compliance program for maximum success. For example...

### Investigations

When screening results in a match, a deeper investigation should follow. For example, a match might be a false positive (the person actually isn't excluded) or a "permissive exclusion" where the person could be eligible to participate in healthcare programs again sometime in the future. Determining the full facts of a screening issue is important, both to keep good employees on staff and to avoid patient harm or litigation risk. Investigation protocols must be able to "pick up" screening evidence and carry it further.

### Training

Employees should receive training and other messages from senior leaders about screening: that it exists, and misconduct that puts an employee on the LEIE could put their job and long-term career prospects in serious jeopardy. The mere existence of screening can dissuade employees from misconduct — so put that fact to work!

### Internal Hotline Reporting

Most employees want their businesses to succeed, and will raise concerns via internal compliance hotlines. So when a report arrives about a coworker or third party who seems suspicious, screening can be an early step to investigate those issues. Internal reporting and screening procedures should support each other to help compliance find the truth about allegations.

# Screening Matters; Do It Right

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Sanctions screening is a fact of life for healthcare businesses; if they want to do business with the U.S. government, they must perform screening somehow. So the questions then become (1) how you can perform screening in a cost-effective manner; and (2) how can screening complement the rest of your corporate compliance program?

Working with the right data is crucial. So is putting together the right mix of technology, internal procedures, and outside expertise to assure that your screening program has maximum efficiency: able to identify the greatest number of possible matches at the lowest cost to your budget. Compliance officers should think through those strategic questions at the beginning, so they don't squander resources later.

And always remember: **strong sanction screening capability is good for your business**. It reduces regulatory enforcement risk and other threats of fraud, patient abuse, and litigation. Done right, sanction screening pays for itself, in the form of costly mistakes that never happen and an engaged, ethical workforce that can keep your business moving in the right direction.

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