

Compliance For Exclusion, Sanctions and Violations

Information on the Monthly Requirement for Medicaid Exclusion and Sanctions

Iowa Medicaid school-based providers must comply with provisions under 42 CFR § 455.436 (Federal database checks) and confirm individuals whose services are billed to Medicaid are not excluded. A provider must sign the [Iowa Medicaid Provider Agreement \(470-2965\)](#) in order to enroll in the Iowa Medicaid program and as a condition of re-enrollment stating this requirement. The compliance activity includes checking two sources to capture exclusions and reinstatements: the federal list provided on the [United States Department of Health and Human Services Office of Inspector General webpage](#) and the [Iowa Health and Human Services \(HHS\) Medicaid Program Excluded Individuals and Entities webpage](#). The local education agency (LEA), area education agency (AEA) or signatory partner completes a search of these sources monthly in order to capture exclusions and reinstatements that have occurred since the last search. A provider must report to the Iowa HHS Medicaid any exclusion information discovered through such searches.

There are individuals who have been excluded by the federal government from participation in the Medicaid program. An exclusion might be temporary, as when it is related to license expiration, or it may be for a mandatory period of one to five years, or permanent. Exclusions occur for many reasons including program-related criminal convictions, patient abuse, unlawful use of controlled substances and more. **It is important that you do not claim reimbursement for services provided by an excluded individual.** Service provided by a sanctioned individual is not reimbursable by Iowa HHS Medicaid, is considered an overpayment, and shall be recovered. If Iowa HHS Program Integrity (Program Integrity) discovers a provider is excluded from reimbursement by federal/state dollars, Iowa HHS Medicaid will exercise its administrative authority to take further action. More details can be found in [Provider Information Letter 1235](#).

In addition, Iowa HHS Program Integrity may ask that LEAs, AEAs, and signatory partner provide the name, date of birth, and last four digits of the social security number for any individual providing services that the entity is claiming reimbursement from Medicaid. All items are necessary to provide for a second identifier in case there is match between one of the providers in the LEA, AEA or signatory partner and an individual on the list. This request is related to 42 CFR 455.400-455.470 and Program Integrity responsibilities to ensure that providers of services are eligible to be reimbursed with federal and state dollars.

To assist with meeting the above outline requirements, a [Medicaid Monthly Compliance Exclusions and Sanctions Provider Template](#) and a [Medicaid Monthly Compliance Exclusions and Sanctions Provider Checklist Tip Sheet](#) are posted on the Department's [School-Based Medicaid page](#).

For any questions or assistance with checking the Exclusions databases, please contact the Iowa Department of Education.