

Medicaid: Exclusion List Verification Requirement

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. In order to enroll in the Iowa Medicaid program, and as a condition of re-enrollment, a provider must sign the Iowa Medicaid Provider Agreement (470-2965), <https://dhs.iowa.gov/sites/default/files/470-2965.pdf?032220211930>, which contains this requirement.

The requirement includes checking of two sources to capture exclusions and reinstatements: the federal list provided on the HHS-OIG website <https://exclusions.oig.hhs.gov/> and the state's list, which linked from the Iowa Medicaid Program Integrity website: <https://dhs.iowa.gov/ime/providers/program-integrity>. Search of these sources is to occur monthly in order to capture exclusions and reinstatements that have occurred since the last search. A provider must report to the Iowa Medicaid Enterprise (IME) 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, and controlled substances. **It is important that you do not bill for services provided by an excluded individual.** Service provided by a sanctioned individual is not reimbursable by Iowa Medicaid, is considered an overpayment, and shall be recovered. If Program Integrity discovers a provider is excluded from reimbursement by federal/state dollars, the Department of Human Services will exercise its administrative authority to take further action.

More details can be found in Provider Information Letter 1235

<https://secureapp.dhs.state.ia.us/IMPA/Information/ViewDocument.aspx?viewdocument=49077aea-1e88-4b5f-98d4-9aa17bef61f6>

In addition, Iowa Medicaid Program Integrity has asked that participating districts and AEAs provide the name, date of birth, and last four digits of the social security number for any individual providing services that the entity is billing to Medicaid. All items are necessary to provide for a second identifier in case there is match between one of your individuals and someone 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/state dollars.

To assist with meeting the above outline requirements, a School-Based Provider Search Template has been developed and posted on the School-based Medicaid page of the Department's website: <https://educateiowa.gov/pk-12/school-business-and-finance/special-education-finance/school-based-medicaid>. Each quarter, complete the attached template, including the National Provider Identifier (NPI) of your district or AEA, and provide the requested information to Jim Donoghue, Iowa Department of Education Medicaid Consultant at jim.donoghue@iowa.gov. For any questions or assistance with checking the Exclusions databases, please contact Jim at 515-281-8505 or 515-326-1032.