



ALCOHOL, DRUG & MENTAL HEALTH SERVICES
MANUEL J. JIMÉNEZ JR., MA, MFT, DIRECTOR

2000 Embarcadero Cove, Suite 400
Oakland, California 94606
(510) 567-8100 / TTY (510) 533-5018

May 16, 2016

To: All BHCS Contracted MH & SUD Organizational Providers Who Bill Through INSYST or eCURA
From: Karyn Tribble, Acting BHCS Director
RE: Exclusion List Monitoring & Monthly Provider Attestation

A new policy was approved on April 25, 2016 entitled [OIG and Other Exclusion List Monitoring, Oversight, and Reporting](#) which replaces the draft “Policy on Exclusion List Monitoring” that was put in place in August 2014 and effective per the letter from the BHCS Director dated August 12, 2014. Under this new approved policy, contracted organizational providers who bill through INSYST or eCURA are required to:

- Update their BHCS Staff Roster with staff additions, departures, and staff information changes at least monthly using the Staff Number Request E-Form located on the Provider e-Forms page: <http://achcsa.org/behavioral-health/eforms.aspx>. “Staff” used in this context includes contractor’s clinical and non-clinical employees, volunteers, and agents of contractor who provide goods and services under the contract with BHCS. The Provider e-Forms page can be accessed by logging into the BHCS Network via the webportal: <https://go.bhcsportal.org/vpn/index.html>.
- Attest monthly that they have updated their Staff Roster using the Monthly Staff Change Attestation e-Form located on the Provider e-Forms page: <http://achcsa.org/behavioral-health/eforms.aspx>. The Provider e-Forms page can be accessed by logging into the BHCS Network via the webportal: <https://go.bhcsportal.org/vpn/index.html>.
- Screen all potential employees, volunteers, and agents using the Federal and State lists (below) prior to employment or contracting.

Financial penalties may be applied to a contractor’s monthly claim for any month that the contractor does not comply with the requirements listed above.

Per Federal and State regulations¹, individuals or entities that are on any exclusion list for Federally funded health care programs may not provide services for BHCS. BHCS monitors the exclusion lists monthly based on the staff information that is provided by each organization. **BHCS will now monitor the exclusion lists for ALL employees, volunteers, and agents of both BHCS and BHCS’s Contractors therefore it is crucial that BHCS Contractors update their staff roster at least monthly. As well, contractors are required to attest that they did so or indicate on the attestation that there were no changes that month.**

Per regulations, BHCS checks the following Federal and State lists:

Office of Inspector General List of Excluded Individuals and Entities (LEIE)	https://exclusions.oig.hhs.gov
System for Award Management (SAM) (previously know as EPLS – Exclude Parties List System)	https://www.sam.gov
California DHCS Medi-Cal List of Suspended or Ineligible Providers	http://files.medi-cal.ca.gov/pubsdoco/SandLanding.asp
Social Security Administration Death Master File (as of 2/1/16)	https://www.ssdmf.com
National Plan and Provider Enumeration System (NPPES)	https://npiregistry.cms.hhs.gov/



Actions needed by your organization:

- Per the new policy, please update your Staff Roster immediately to include non-clinical staff and your agents providing services and goods under your BHCS contract.
- BHCS will now be requiring contractor's to submit Social Security Numbers for their new staff in order to get an INSYST Staff # as this is needed to do the Social Security Administration Death Master File check. As well, **by July 1, 2016**, please update all current staff's information with their SSN by sending in an updated Staff Number Request E-Form with the SSN.
- The BHCS Information Systems Office (IS) will be sending out each contractor's INSYST Staff Roster to your INSYST printer cue at the end of June 2016 and annually thereafter. Detailed instructions will be included on the INSYST Staff Roster report. Please review the roster and submit a Staff Number Request e-form to make any changes or remove any expired staff/entity. Each organization will be required to return a printout of the INSYST Staff Roster with their July invoice to the BHCS Network Office notating the updates that were made. For contracted organizational MHP Network Providers who do not have access to INSYST a hard copy of the Staff Roster will be sent to them by the BHCS IS Office.

For more information, see BHCS Policy #1703-2-1 [OIG and Other Exclusion List Monitoring, Oversight, and Reporting](#) dated April 25, 2016 and the following documents, all of which can be found in the QA Manual on the BHCS Provider Website.

[Letter from BHCS Director dated August 12, 2014](#)
[Draft HCSA Policy on Exclusion List Monitoring](#)

If you have questions or need assistance in complying with these requirements please direct your calls to:

For assistance navigating the Staff Number Request E-Form or the Monthly Staff Change Attestation Form	Information Systems, (510) 567-8181
For queries regarding any staff member who has been de-barred, or you wish to have re-instated for claiming	Quality Assurance, (510) 567-8105

Thank you for your cooperation in ensuring that we meet Federal and State regulations for claiming for service reimbursement from Federal Health Care programs including Medicare, Medicaid, and all other health care programs that receive Federal Funds.

¹CFR Title 42, Sections 438.214(d), 438.610, 455.400-455.470, 455.436(b), DMH Letter No. 10-05, MHP Contract with DHCS, Exhibit A, Attachment 1, Program Integrity Requirements.