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The Hidden Challenge of Healthcare Exclusion Lists

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Introduction: Why Searching Healthcare Exclusion Lists Is Like a Treasure Hunt – Without a Map

Welcome to the wonderfully complicated world of healthcare exclusion lists! If you've been handed the task of ensuring your organization doesn't accidentally pay someone who's been excluded from participating in federal healthcare programs, then buckle up! You're about to embark on a journey that feels like searching for a needle in a haystack... with a flashlight, and maybe a magnifying glass. But here's the kicker: that needle is a criminal, and the haystack? Well, it's full of names with very few identifiers.

So, let's dig into this. You might think that checking the **OIG LEIE** (List of Excluded Individuals and Entities), the **SAM** (System for Award Management) list, and various state exclusion lists is an easy task. But oh no, the process is far from straightforward. In fact, it's the compliance equivalent of finding Waldo — if Waldo didn't have his signature red-and-white stripes and you didn't know if you were looking for a human or a corporate entity.

The Exclusion Lists: **OIG LEIE**, **SAM**, and State Lists — Where's the Key to This Maze?

Here's where the fun begins. We have several key exclusion lists that need to be checked:

- **OIG LEIE:** This is the benchmark list out there, maintained by the Office of Inspector General. It tracks individuals and entities who have been excluded from participating in Medicare, Medicaid, and other federal healthcare programs. If you're on the **LEIE**, you're banned from taking any more federal funds, and that's not a place you want to be. But while it sounds straightforward, it's not. The list doesn't always provide enough identifying information to easily pinpoint the person you're looking for. It's like trying to find the one John Smith in a crowd of thousands.
- **SAM:** Then there's the **SAM** list, which covers people and organizations excluded from receiving federal contracts or grants. It's not just about healthcare fraud here; it's anyone involved in federal transactions. But guess what? **SAM** doesn't exactly roll out the red carpet for you, either. Like the **LEIE**, it provides minimal details, and it doesn't always make it easy to verify identities. You might end up with multiple John Smiths or XYZ Corporations and have no clue which one is excluded. It's a game of "guess who," but with much higher stakes.
- **State Exclusion Lists:** Don't forget the state-level exclusions. Some states have their own exclusion lists that operate independently of the federal ones. Some states may follow the **LEIE** or **SAM**, while others create their own unique lists. Now, you have the necessary task of checking *multiple* sources — because checking just one list is far too easy. Each state has its own rules, and each state list is as quirky as the next. So, if you're working across state lines or with state-funded programs, you're going to need to keep track of all those individual exclusions. You get the added responsibility of adding more lists to your monitoring routine, as if you didn't have enough on your plate already, but with Exclugo's AI & Machine Learning capabilities your tasks and individual search preferences are "learned" and thus optimized for both time savings AND accuracy.

EXCLUGO.AI FEDERAL MONITORING OPTIONS



OIG
EXCLUSIONS



PROFESSIONAL
LICENSES



SEX OFFENDERS
(with identifiers)



OFFICE of
FOREIGN ASSETS
CONTROL



NATIONAL
PROVIDER INDEX



DEATH MASTER
FILE

The Lack of Identifiers: Your "Needle" Doesn't Come with a Red Flag

Okay, now let's talk about what makes this all so ridiculously difficult: **the lack of identifiers**. While the **LEIE**, **SAM**, and state lists can provide the names of excluded individuals or entities, they rarely give you enough detail to easily tell which person or company is on the list.

Sure, **OIG** allows you to search by name, and you can even use a **Social Security Number (SSN)** to verify an identity. However, this sounds easier than it is. In theory, it might seem simple to enter someone's SSN and cross-reference it with the database. In practice, though, this process is painstakingly slow and inefficient for a large organization. You're looking at entering one SSN at a time — one by one. For a healthcare organization dealing with thousands of contractors, employees, and vendors, this is time consuming and fraught with inaccuracies due to the sheer volumes of data.

So, here's the fun part: unless you want to spend the next decade manually checking every single person with an SSN, you'll need to figure out how to automate or streamline this process — if you're lucky enough to have the resources. But it's extremely time-consuming and *far from efficient*. Multiply that effort by the number of vendors, contractors, and employees you deal with — and throw in a couple of state exclusion lists for good measure. Suddenly, you're looking at a full-time job just to keep everyone off the "Do Not Pay" list.

The Dreaded Aliases: A Whole New Level of Frustration - Here's where things really start to get tricky — **aliases**. If you thought finding someone named "John Smith" was difficult, try finding someone named "Johnny S.", "J. Smith," or "Johnathon Smythe" (we're not even getting into "aka" names, like "The Kingpin"). Excluded individuals and entities don't always stick with the name they were born with. They might use an alias to "fly under the radar."

But here's the plot twist : Exclusion lists don't always tell you when aliases are involved. This means that even if you've searched the official list a million times for the "right" name, you might be missing someone who's listed under an alias. This is like looking for a specific puzzle piece that doesn't fit any of the shapes you've got — and the shape you're looking for just happens to be in disguise.

Proper vetting comes into play again: you need to cross-reference those names with other information to make sure you aren't missing something. And this is where things can get messy. It's like that one game of "Where's Waldo?" where you swear you've looked everywhere, but he's hiding behind a tree *with a new wig*.

Why Proper Vetting Matters (Because There Are Too Many "John Smiths")

When it comes to checking the **LEIE**, **SAM**, and state exclusion lists, just flagging a name and moving on isn't good enough. With all the missing details and vague identifiers, you could end up crossing paths with the wrong "John Smith" or "XYZ Corporation." In other words, you might mistakenly believe that your "John Smith" is the fraudster on the list — when in fact, it's just a coincidence that you've picked the same name out of a sea of people. Whoops.

Proper vetting is crucial here. Once you find a name on the exclusion list, it's not time to hit the panic button — it's time to verify, cross-reference, and investigate. Here's what you should be doing:

- 1. Cross-Referencing:** Use any other available data points — addresses, dates of birth, company affiliations — to narrow it down. You might need to dig through court records, news stories, or other databases to confirm it's the right person or entity. It's like playing detective.
- 2. Contacting Authorities:** If you're not sure, don't hesitate to reach out directly to the OIG or SAM for more information. They might be able to provide additional details (or at least point you in the right direction). In fact, it's a good idea to just call them if you have a reasonable doubt. Trust us: it's much easier to pick up the phone than deal with the fallout later.
- 3. Vetting Thoroughly:** Don't be lazy about this. The cost of missing an excluded individual or entity can lead to serious fines, repayments, and a damaged reputation. And here's the kicker: if your organization does business with someone on any exclusion list, not only will the government refuse to pay you for services rendered — you'll also be hit with hefty fines. **The government will not pay you a dime if you're caught with an excluded individual or entity on your payroll or in your vendor list, and that's a big deal.**

The Importance of Regular Monitoring: It's Like Checking Your Social Media, But for Compliance

If you think you can check the **LEIE**, **SAM**, and state exclusion lists once and call it a day, think again. These lists are continuously updated, and individuals or entities can be added or removed at any time. So, if you only check once, you might be in for an unpleasant surprise when the next round of exclusions gets posted. This is not a “one and done” deal — it's an ongoing, regular task.

Just like checking your social media to see if someone inadvertently tagged you in an embarrassing post, you need to keep an eye on these lists regularly. Monthly checks are a good starting point, but the more frequently you monitor, the better. It's also a good idea to check every time a new employee, contractor, or vendor is added to your team or organization. It's like preventing a “bad apple” from spoiling your entire basket of fruits — only in this case, the bad apple could result in fines, repayments, and a very unhappy compliance officer.

