



Outsourcing Sanction Checking, Investigation, and Resolution

Richard P. Kusserow | August 2024

[Having experts complete the sanction checking process can save time and money](#)

[Jillian Bower Concepcion](#), MPA, CHC, CHPC Senior Consultant, has been providing and advising on sanction screening and checking services for years and notes that utilizing a third-party vendor to conduct sanction checking is only one part of ensuring that your organization is not employing or contracting excluded individuals or entities. The remaining effort includes conducting the actual sanction check, resolving potential “hits,” and preparing a report for the record to evidence that the process was executed correctly.

When screening against the Office of Inspector General’s List of Excluded Individuals and Entities (OIG LEIE), the OIG’s system is user-friendly and organizations can easily research and resolve potential hits to names included in the exclusion database. However, another commonly-screened exclusion database, the General Service Administration System for Award Management (GSA SAM) list, provides no assistance when screening organization names against those in the database. This sanction checking database just refers the person conducting the sanction check to the originating agency. Once on the agency’s website, they may be able to find more data that can help determine whether a name in question is identifiable with any of the individuals or entities excluded by the agency. But many federal agencies will not provide any assistance or information to help resolve positive matches. Given these factors, the investigation process can be timely and costly, especially for those that are not experienced in conducting the sanction checking process.



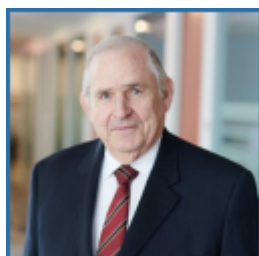
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Ms. Concepcion says it is worth considering employing a third-party vendor to [both conduct the sanction checks, and provide additional verification services](#) including investigating and resolving potential hits. Many vendors offer both of these services as a package deal, which can be surprisingly inexpensive when

compared to the time and cost of completing all of the work in-house. In many cases, outsourcing the entire process may actually cost less than what some vendors may charge for only using their sanction screening tools. If an organization opts for outsourcing the entire process, Ms. Concepcion stresses the importance of ensuring the vendor will provide a certified report of the results of the sanction check. Maintaining a record of all sanction checks is important to evidence that the process was conducted properly and accurately to avoid future penalties.

Interested in learning more about sanction screening? Contact Shelby Cole at scole@complianceresource.



About the Author

Richard P. Kusserow established Strategic Management Services, LLC, after retiring from being the DHHS Inspector General, and has assisted over 2,000 health care organizations and entities in developing, implementing and assessing compliance programs.