



Sanction Screening Monitoring and Auditing


Richard P. Kusserow | November 2024

Overview

Organizations should conduct an annual review of their exclusion screening processes. This includes debriefing individually with those responsible for sanction screenings and reviewing document retention processes. The goal is to ensure documentation of the screening function, responses to findings, and corrective actions are adequately maintained and auditable. An effective review process strengthens compliance efforts, mitigates risks, and aligns the organization with regulatory standards.

The following are items to be included in the audit of the sanction screening program:

- Review the sanction screening policy documents and what is said about the process.
- Determine if there is ongoing monitoring of the sanction screening process.
- Review the results of ongoing monitoring of the sanction screen process.
- Determine if reports are made to leadership and the Board on screening results; if so, review them.
- Verify background and sanction checks are conducted in accordance with applicable rules and laws (e.g., employment, promotions, credentialing).
- Identify sanction lists that individuals are screened against (e.g., LEIE, GSA, Medicaid Exclusions).
- Verify that due diligence is conducted on third parties (e.g., consultants, vendors, acquisitions).
- Assure that corrective action is taken based on background and sanction check findings.
- Evaluate the cadence of sanction screening processes.
- Assess whether searches are performed by internal staff and evaluate the time and effort devoted to it.
- Determine if a vendor tool is used for sanction screening.



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- Confirm if a vendor is used to investigate or resolve potential matches and identify who performs this task.
- Review the terms and conditions of the sanction screening vendor.
- Determine the categories of persons and parties that are being screened.
- Identify those who develop the list of parties to be screened (e.g., employees, contractors, physicians).
- Examine the process being followed when conducting sanction screening.
- Identify who is charged with determining whether a potential match is valid.
- Examine how potential matches are investigated and resolved.
- Determine if there have been any confirmed matches with a sanctioned party and identify how it was managed and by whom.
- Confirm if there have been any disclosure-excluded parties identified to government authorities.
- Determine who and where documentation evidencing sanction screening is maintained.

Interested in learning more about Sanction Screening? Contact Shelby Cole at scole@complianceresource.com.



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.