



OIG_GSA Exclusion Review September 2008

As outlined in Chapter 9 of the Medicare Prescription Drug Benefit Manual, the Centers for Medicare & Medicaid Services (CMS) requires Medicare sponsors (CIGNA) to obtain certifications from first tier entities, downstream entities, and related entities that these entities will review the Office of Inspector General (OIG) and General Services Administration (GSA) exclusions lists upon initially hiring and annually thereafter to ensure that any employee or manager responsible for administering or delivering Part D benefits is not excluded from Federal health care programs. Additionally, if an employee of the first tier entity, downstream entity, or related entity responsible for the administration of delivery of any Part D benefits is on such lists, that employee will immediately be removed from any work related directly or indirectly to all Federal health care programs and the entity will take appropriate corrective actions.

CIGNA issued a notice in August 2007 to pharmacies contracted with us outlining the CMS requirements for entity OIG_GSA Exclusion review and attestation (see Pharmacy Attestation Template). All new pharmacies contracted with CIGNA since the August 2007 notice are required to provide this attestation when they join CIGNA's Pharmacy Network (see [pharmacy_credentiaing_application.pdf](#)).

To assist you with implementation of your OIG_GSA Exclusion process, CIGNA is providing links to the OIG_GSA exclusion rules, definitions of the websites utilized to check status, and general expectations for retaining documentation.

Excluded Party List System (EPLS) - <http://www.epls.gov/>

This list is maintained by the General Services Administration The Excluded Parties Listing Systems (EPLS) is the electronic version of the Lists of Parties Excluded from Federal Procurement and Nonprocurement Programs (Lists), which identifies those parties excluded throughout the U.S. Government (unless otherwise noted) from receiving Federal contracts or certain subcontracts and from certain types of Federal financial and nonfinancial assistance and benefits. EPLS data is received and maintained by Federal debarring/excluding agencies only. A federal agency may maintain an internal agency system similar to EPLS. However, the EPLS database maintained by GSA is the official government-wide system of records of debarments, suspensions and other exclusionary actions. EPLS is not a subset of or a supplement to any other system. GSA cannot guarantee the accuracy of data provided by other systems.

List of Excluded Individuals and Entities (LEIE) - <http://exclusions.oig.hhs.gov/>

This list is maintained by the Office of Inspector General and this list provides information to the health care industry, patients and the public regarding individuals and entities currently excluded from participation in Medicare, Medicaid and all Federal health care programs. Individuals and entities who have been reinstated are removed from the LEIE.

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Documentation must be retained to support results (screen prints of negative results is acceptable).

If you have any questions, please contact Rich Appel, Medicare Services Compliance Officer at 860-226-7696.



Pharmacy

Attestation template.



pharmacy_credentiali

ng_application.pdf

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