

Corporate Procedure

Subject:	Credentialing Preclusion and Sanction Checks		
Procedure ID:	P&C_Cred_101.009	Created Date:	2/20/2014
Authorized By:	Laura Barton, Director Credentialing Compliance	Review Date:	1/22/2026
Department:	People & Culture: Credentialing	Approval Date:	1/22/2026

PURPOSE:

To maintain oversight and ensure compliance of transportation providers, their owners/officers, person with controlling interest, drivers, personnel, and attendants/aides, etc. by screening a third-party database for potential prohibitive sanctions listed by, but may not be limited to the following entities:

1. System for Award Management (SAM)
2. Office of Inspector General (OIG)
3. U.S. Treasury and Blocked Persons & Office of Foreign Assets Control (OFAC)
4. Office of Personnel Management (OPM)
5. LEIE
6. State Exclusion Lists
7. CMS Preclusion List

Per the Centers for Medicare & Medicaid Services (CMS) Managed Care Manual Chapter 21, sanction checks are required monthly for approval of transportation providers and personnel prior to providing transportation services. MTM works with a third-party company to review SAM, OIG, and published state exclusion lists prior to a transportation provider or driver’s approval and monthly thereafter.

POLICY:

ID	Subject
P&C_Cred_101	Credentialing Overview
P&C_Compliance_100.006	Compliance Oversight of Sanction Screenings

Medical Transportation Management, Inc. (“MTM”) as referenced in this Corporate Policy and Procedure shall be applicable to all MTM Subsidiaries and Affiliates.

DEFINITIONS:

Term	Description
MTM	Medical Transportation Management, Inc. and all Subsidiaries and Affiliates.

RESPONSIBILITY:

1. Sanction checks will be performed for each transportation provider, owners/officers, drivers, and attendants/aides prior to the entity’s initial approval and monthly thereafter. These checks include all published state Medicaid exclusion lists and CMS exclusion lists.
2. Information maintained for each owner/officer, person with controlling interest, driver, attendant/aide will include, but may not be limited to first name, last name, date of birth, driver’s license number (if applicable), and vendor code.
3. Information maintained for each transportation provider will include but may not be limited to the transportation provider company name, vendor code, state, and federal tax ID number.
4. All sanction check results will be saved to MTM’s credentialing files.
5. After a full review has been completed and if the company or any personnel are found to be a match, the company or personnel will be immediately deactivated until the entity or person is cleared. This process will be completed according to contractual agreements and matches will be forwarded to the client per contract requirements.
6. On a monthly basis, Credentialing reviews the CMS Preclusion List to confirm there are no matches between the MTM network and Transportation Services on the CMS List.
 1. If a match is found, the company or personnel will be immediately deactivated until the entity or person is cleared. This process will be completed according to contractual agreements and matches will be forwarded to the client per contract requirements.

All policies and procedures are reviewed on an annual basis for appropriateness and effectiveness.

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