

OIG/GSA (SAM) Policy and Procedure Exclusion Screenings

To ensure all Fabian Insurance Services employees who work directly on MA, PDP or MAPD related business including temporary employees, interns, volunteers, consultants, governing body members, FDR, sub-contractors (down-streams) are not included on either the Office of Inspector General (OIG) and General Services Administration (GSA) System for Award Management (SAM) List of Parties Excluded from Federal Programs, exclusion screenings will be held.

For such screenings, the following procedure will be issued:

- All individuals or entities who work directly on MA, PDP or MAPD related business are screened against both the OIG listing and the GSA (SAM) listing prior to hire (contracting) and at least monthly thereafter.
- Any individual or entity found on either exclusion listing will not be offered a position and/or hired directly related to MA, PDP, or MAPD business.
- If an individual/entity is found on either exclusion listings, the individual/entity will be immediately removed from all MA, PDP, or MAPD business and the appropriate Plan Sponsor will be notified of the finding.

Documentation to support employee screenings against the OIG listing and GSA listing prior to hire (contracting) and monthly thereafter will be maintained for a minimum of 10 years.