

5 Risky Sanction Screening Mistakes

That can cost you big time



Introduction

You Can't Afford to be out of Compliance.

Even if you think you're screening correctly frequently enough, you won't know of a risk until the damage is done – unless you get it right. In our experience with sanction and license screening, there are common mistakes that can be avoided to make sure you don't end up on the wrong side of a violation.

License checking is a hard, manual job with potentially disastrous ramifications for an individual mistake. But with the right planning (or vendor) you can rest easy knowing that the physicians and other practitioners who have access to your patients are sanction free.

Who this eBook is for?

- CEOs, General counsels
- Chief Compliance Officers
- Compliance Analysts
- Sanction Screening Professionals

The 5 Top Mistakes

In our experience, these are the top 5 mistakes that cause an organization to lose time & money and sometimes land themselves into some legal trouble as they try to get this process right:

- Searching TOO MANY lists
- Over-Reliance on public databases
- Focusing on Type 2 errors
- Ignoring the death master file
- Mishandling Interactions



Risk #1: Searching Too Many Lists

Problem:

If you indiscriminately search every list available, you're at risk of:

- Spending too much effort on the wrong focus
- Burning out your team
- Wasting your budget

Doing extra work is not just a waste of your team's effort and budget, it may lead to missing other more damaging risks without providing any meaningful risk reduction



Solution:

Take an intelligent, balanced, and contextualized look at which lists are going to hit that sweet spot of having a high potential (not just some vague remote chance) of identifying a sanctioned party that is putting your company at risk

Risk #2: Over Reliance on Public Databases

Problem:

If you're relying on public databases, your view into sanction data is too limited. Public or downloaded databases are insufficient for the thorough sanction screening you need to protect your organization and patients.

Solution:

A proper sanction screening process should acquire, and consider, information available at agencies but NOT publicly available in posted databases for download and automation. Sanctioning agencies have powerful, non-public, insight and clarity at a crucial stage in the process you can access only by interacting with them. This helps help rule out an exclusion and avoid having an unnecessarily uncomfortable conversation with an employee. Additionally, it can give you a much needed confirmation before engaging a lengthy investigation so you can act quickly and with assurance to remove a disqualified physician.



Risk #3:

Focusing Only on Type 2 Errors

Problem:

In statistics and data analysis it's common to talk about two types of errors:

1. Type 1 errors are false positives - you're unaware that an employee has been matched
2. Type 2 errors are false negatives - you think an employee has been matched

Type 1, or false positives, pose a much greater risk to patients and should be prioritized as a point of excellence in your exclusion screening process.



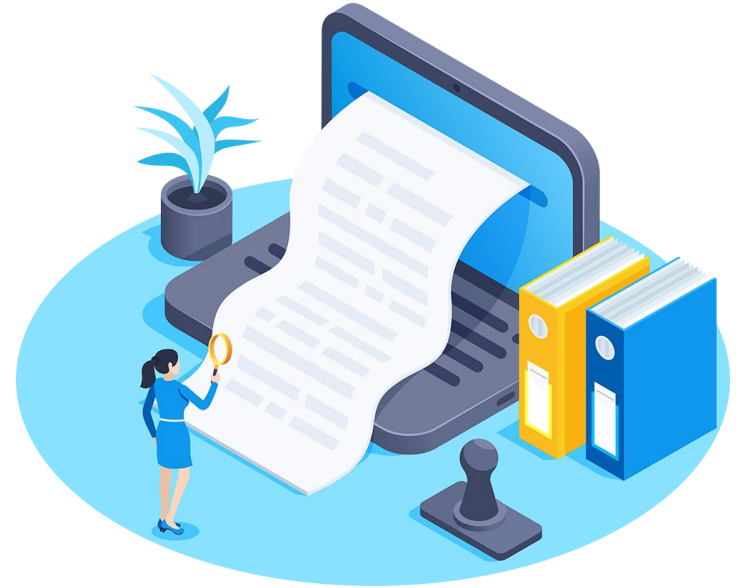
Solution:

Build your process to screen, identify, and potentially review all of the likely false negative matches. Carefully identify true positive matches and remove those entities so they stop putting your patients at risk.

Conclusion

It's important to remember that if you aren't paying attention and don't get them out, sanctioned individuals can harm your business.

There are bad people out there who don't care if they harm patients or threaten your reimbursement. But with so many names and screening results it makes it hard to separate the good from the bad. You'll bear the cost by overloading your team or allowing risks to go unmitigated unless you get exclusion screening done right.



Risk #4: Ignoring the SSN Death Master File

Problem:

If you're not checking against the Social Security Death Master File, you may have a physician or an employee who has submitted a fraudulent social security number caring for your patients. Fraudulent social security numbers expose your organization and patients to risk.

Solution:

Leverage the Social Security Death Master File correctly without searching sanction lists to make sure that your employees have submitted a proper number.



Risk #5: Mishandled Interactions

Problem:

When the matching data is concerning enough that you need an additional check even though you don't know for sure, or even sometimes when it seems pretty likely that an employee has been sanctioned you'll frequently engage the employee or physician in a discussion where you share your discovery of the sanction with them. The biggest errors here are to not have these interaction at all! If you just terminate an employee anytime you see something questionable or, worse, never have that gray area discussion when you're not sure, then you're likely making errors. Damaging individuals remain employed or hard-working, honest physicians are separated due to mistakes from your compliance team.



Solution:

A best practice is to implement a waiver process whereby once you've done all you can with the information in your internal system and the comparable information both on public list and through direct personal contact with the sanctioning agency

What should you expect from your Vendor?

- Complete (or guide and inform) a robust process including direct agency (nonpublic info) follow up and employee attestations
- Robust technology and automation with configuration sufficient to fit your team, budget, and risk tolerance
- Provide clear advice, and facilitate your exclusion choices based on your risk exposure and tolerance
- Educate and collaborate on how to handle data gaps and unclear comparisons What should you expect from your vendor?
- Update you on changes and improvements that can reduce your work and improve your risk coverage
- Flexibly enable your team to collaborate, report, and share responsibility across departments and geography
- Answer questions, advise on challenges, and help your team make good decisions
- Actually CARE, as evidenced by responsiveness, thoughtfulness, and willingness to say 'Yes' when you need something (even out of scope, off-contract)

About Ethico

For more than 20 years, Ethico has put our customers and the quality of our work before profits to become the leading provider of ethics and compliance (E&C) solutions and second-largest player in the space. Our clients trust us to listen to their employees and empower us to assist in the identification of unethical, illegal, and questionable behavior.

In building this trust, we have provided compliance solutions in 50,000 locations to more than 6 million employees in 100+ countries through our highly-trained, caring, and compliance-minded professionals. We have helped E&C leaders investigate nearly 10 million reports, offering employees the industry's leading-edge tools to report unethical or illegal behavior free from retaliation.



The industry's most trusted end-to-end sanction screening solution.



- ✓ Fastest turnaround time
- ✓ Most responsive service
- ✓ Lowest error rate
- ✓ Perfect fit solutions



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