

# UIC POLICIES AND PROCEDURES

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324

MANUAL Human Resources	SECTION Employment Guidelines	PAGE 1 of 1
SUBJECT Annual Sanction Review for Employees	EFFECTIVE 1/14/2008	REVISED 9/01/2013
ISSUED BY UIC Human Resources	APPROVED BY Chancellor	

## PURPOSE

The University of Illinois at Chicago strives to provide the safest possible environment for students, visitors, faculty, and staff, and to protect its information and physical resources. Annual sanction reviews serve as an important part of the ongoing employment relationship and therefore support the University's effort to maintain compliance with federal and state requirements.

## SOURCES AND BACKGROUND

Medicare-Medicaid Anti-Fraud and Abuse Amendments  
Civil Penalties Law  
Medicare-Medicaid Patient and Program Protection Act  
Balanced Budget Act

## APPLICABILITY

All employees in HIPAA "covered entities" as defined by the University of Illinois Board of Trustees on July 17, 2003, in health care related units, central campus operations which serve those units and University Administration offices on the Chicago campus.

## POLICY

All employees in HIPAA "covered entities" as defined by the University of Illinois Board of Trustees on July 17, 2003, in health care related units, central campus operations which serve those units and University Administration offices on the Chicago campus will undergo an annual sanction review.

No person will be retained in a position requiring an annual sanction review if that person is a match on any government exclusion listing. An employee has the right to obtain a copy of the report and may challenge the accuracy and completeness of the report with the reporting agency.

A representative of UIC Human Resources will be designated to oversee compliance with this policy and shall serve as the Human Resources Criminal Background and Sanction Check Coordinator.