

Supplier “Totality Tip Sheet”

Completing Verification Checks & Uploading OIG-EPLS Screen Shots

Overview

Suppliers are required to conduct **Four** compliance verification checks on ALL **US** HCPs the supplier will interact with/make payments to on behalf of J&J. These verifications are required to be completed prior to contracting or engaging the HCP in any work (i.e., *OIG exclusion; Excluded Parties List System (EPLS); FDA Debarment, and proof of valid State License*).

Special Note: Clinical Activities – verification checks should be completed on both the clinical trial site/HCP as well as the Primary Investigator for each clinical site associated with the project.



If a search results in a match for any HCP, notify the J&J Affiliate Project Manager immediately of the results and do not proceed with any further interactions with the HCP. The Project Manager, HCC and Regulatory will need to provide further guidance on how to proceed.

Compliance Documentation Requirements - Verification Checks:

- A dated print screen of the verification check conducted on each participating **US** HCP is required to be uploaded into the Totality system for only the OIG and EPLS searches.
- Supplier is required to complete and document the date of the verification checks on All US HCP's prior to contracting/work. However, screen shots for the FDA debarment and State license verification are Not required to be uploaded into Totality.

Completing Verification Checks:

Go to the following government website/links to conduct the required verification checks:

1. **FDA Debarment:** http://www.fda.gov/ora/compliance_ref/debar/default.htm

The FDA Debarment List provides a public list of firms or persons debarred pursuant to sections 306(a) and (b) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 335(a) and (b)) as published in the FEDERAL REGISTER (FR).

To search for an Individual or Organization: Either scroll down to see if the name appears on this list –OR- type the last name in the search box and choose “go”.

FDA Debarment List

The following is a public list of firms or persons debarred pursuant to sections 306(a) and (b) of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. 335(a) and (b)) as published in the FEDERAL REGISTER (FR):

Firms				
NAME OF FIRM	EFFECTIVE DATE	END/TERM OF DEBARMENT	FR DATE.txt (MM/DD/YY)	VOLUME PAGE.pdf
None as of this date				

Persons				
NAME OF PERSON	EFFECTIVE DATE	END/TERM OF DEBARMENT	FR DATE.txt (MM/DD/YY)	VOLUME PAGE.pdf
Chang, Charles Y.	03/08/1993	Permanent^	03/08/1993	58FR12967

- Medical License:** <http://www.ama-assn.org/ama/pub/education-careers/becoming-physician/medical-licensure/state-medical-boards.shtml>

The AMA website provides links to the individual state websites for state medical licensure information and verification.

- OIG Exclusion:** <http://exclusions.oig.hhs.gov/>

The Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE) database 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

To Search: Individual HCP - enter the Last and First Name; Organization/Institution - enter the Organization/Institution Name

**U.S. Department of Health & Human Services
Office of Inspector General**

[Return to LEIE Home](#)

List of Excluded Individuals/Entities Search

Search up to 5 names

Last Name	First Name	*or* Business Name
Michels	Joseph	

U.S. Department of Health & Human Services
Office of Inspector General

[Return to Search](#)

SEARCH RESULTS

Search Results

No results were found for Michels, Joseph;

Search conducted 7/17/2009 12:37:09 PM EST on OIG LEIE Exclusions database.
Source data updated on 7/10/2009 2:09:20 PM EST

4. **EPLS (Excluded Parties List System):** <https://www.epls.gov/epls/search.do>

The EPLS provides a single comprehensive list of individuals and firms excluded by Federal government agencies from receiving federal contracts or federally approved subcontracts and from certain types of federal financial and nonfinancial assistance and benefits.

To search by Exact Name, check the box at the bottom of the screen. If searching by Last Name only, do not check the box. To close the message window, click the "X" in the top right corner.

EPLS Excluded Parties List System

Search - Current Exclusions

- > Advanced Search
- > Multiple Names
- > Exact Name and SSN/TIN
- > MyEPLS
- > Recent Updates

View Cause and Treatment Code Descriptions

- > Reciprocal Codes
- > Procurement Codes
- > Nonprocurement Codes

Agency & Acronym Information

- > Agency Contacts
- > Agency Descriptions
- > State/Country Code Descriptions

Resources

- > Search Help
- > Public User's Manual
- > FAQ
- > Acronyms
- > Privacy Act Provisions
- > News

Reports

- > Advanced Reports
- > Recent Updates
- > Dashboard

Archive Search - Past Excl

- > Advanced Archive Search
- > Multiple Names
- > Recent Updates

Important EPLS Multiple Name Search Information

- Please note that when matches are found, there may be instances where an Individual or Firm has the same or similar name as your search request but is actually a different party. Therefore, it is important that you verify a potential match with the debarring agency identified in the record information.
- You must acknowledge having read the following information before performing a search by **Exact Name**.
 - The Exact Name search option will only return results if your query is identical to the name of the record in EPLS, including any punctuation, prefixes, or suffixes. Therefore, Partial Name searching is recommended to find matches by name.

Check the following box to acknowledge these statements and enable searching by **Exact Name**. If you do not check the box, this search option will not be available

Click the X in the top right corner of this message window to close it.

Search options on the left side of webpage can be used for more advanced search criteria.

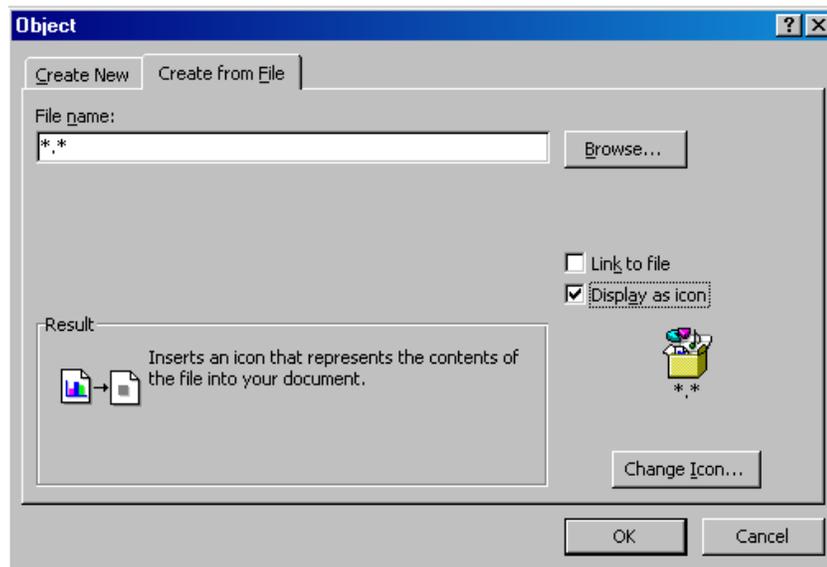
The screenshot shows the EPLS website interface. On the left, a navigation menu is visible with the following items: Search - Current Exclusions, View Cause and Treatment Code Descriptions, and Agency & Acronym Information. Under Search - Current Exclusions, the following options are listed: > Advanced Search, > Multiple Names, > Exact Name and SSN/TIN, > MyEPLS, and > Recent Updates. The 'Exact Name and SSN/TIN' option is circled in red. A red arrow points from this option to the search form on the right. The search form is titled 'EPLS Multiple Name Search' and contains the following fields and options: Exact Name Format: Last, First Middle or Last, First MI. Partial Name Format: Refer to Search Help for tips on Partial Name searching. Name 1: Michels, Joseph A. Name 2: Name 3: Name 4: Name 5: Match: Partial Name Exact Name. Search and Reset buttons are located at the bottom of the form. A red box on the right side of the form contains the following instructions: 1. Enter the supplier's Name, 2. Click "Exact Name", 3. Click "Search".

SEARCH RESULTS

The screenshot shows the EPLS search results page. The search results are displayed in a box titled 'EPLS Search Results'. The results are for 'Search Results for Parties Excluded by' and show the following information: Exact Name : Michels, Joseph A. As of 17-Jul-2009 11:11 AM EDT. Save to MyEPLS. The text 'Your search returned no results.' is circled in red. Below this text, a message states: It is further recommended that you perform a Partial Name search on any word of the name to further confirm the eligibility status of the party. An additional Partial Name search might be necessary because an Exact Name match will not be found if the spelling or format of the name you are searching for is different than the name of the exclusion in EPLS. At the bottom of the results box, there are links for Back, New Search, and Printer-Friendly. A red arrow points from the 'Exact Name and SSN/TIN' option in the search menu to the search results page.

Instructions for uploading required documentation/screen shots (OIG & EPLS only)

1. When you get your search results, press the Control (**Ctrl**) and Print Screen (**PrtScn**) keys on your keyboard. This will take a snap shot of the screen and place it in the clipboard memory.
2. Open a blank Microsoft Word document, and do one of the following:
 - Hold down the CTRL key and press the V key to paste the screen shot into the document
 - Select Edit then Paste from the Word Toolbar
 - Right click and select paste
3. Save the document with the name of the search engine (OIG or EPLS), the HCP name and the date. E.g. EPLS-Karen Smith 05-29-08.doc
4. **NOTE:** Multiple print screens/documents can be inserted into ONE Word Document and saved/uploaded as one file into Totality. To save multiple printscreens into One Document:
 - Open a Blank Microsoft Word Doc
 - Click on Insert > Object
 - Select the Tab "Create From File"
 - Click box "Display as Icon"
 - Browse / Select the files you want to insert



5. Save as the "Consolidated" file with the name of the required document types included (i.e., OIG or EPLS). E.g. **Consolidated HCC EPLS checks – Ad Board 05-29-08.doc**
6. Upload the saved Document into the Totality Extranet:
 - Go the **Data Template/Document Upload** Section
 - From the Data Template Type dropdown menu, Select "Document Only"

- Enter the appropriate Calendar Year and Purchase Order
- Click “Next” – which will take you to the Document Attach/Upload screen

7. Document Upload Screen – Attach and upload the required document

- Go to the “Documents” Section (bottom)
- From the “Attachment Type” dropdown menu – Select the appropriate Document “Type”, depending on the file you are uploading (i.e., EPLS Exclusion or OIG Exclusion)
- Click “Add Document” – (NOTE this action only adds the document for review and does NOT complete the upload)
- Click the “Upload” button to complete the upload of the document/file