

Appendix C. Employee Ineligibility Guidelines

Screening of employees for ineligibility is a process that must be completed on an annual basis. As long as persons continue to engage on behalf of a J&J Pharmaceutical Affiliate (JJPA) for more than 160 hours they will be considered covered by the Johnson & Johnson CIA (the CIA).

To complete the screening process, suppliers can employ the services of a third party organization that specializes in ineligibility screening, such as Yale Associates, or screen the individual persons themselves against the following databases:

- List of Excluded Individuals, Office of Inspector General (OIG) HHS at <http://exclusions.oig.hhs.gov/>
- General Services Administration (GSA), Excluded Parties List System (EPLS) at <https://www.sam.gov/portal/SAM/>
- Food & Drug Administration Debarment List (FDA) at <http://www.fda.gov/ICECI/EnforcementActions/FDADebarmentList/default.htm>

In the event that an employee, contractor, subcontractor or other person engaged in 160 hours or more on behalf of a JJPA is found on any of the above websites or convicted of a criminal offense he or she must be removed from working on the JJPA's behalf. The supplier must maintain a log of the screening activities and actions taken against individuals found on the website should the JJPA require it in support of the CIA reporting obligations. The log must at a minimum include:

- Name
- Title
- Job Function/Responsibilities
- Screening Date
- Action Taken

It is important to note on the Supplier Letter of Attestation where local laws prevent ineligibility screening from taking place.

For your reference, the contact information for Yale Associates is:

Yale Associates
Tom Farley, President
631-732-4400

NOTE: All documentation to evidence that the ineligibility screening was completed must be retained by the supplier and made available to J&J or JJPA in the event of an audit.