

WPS Health Solutions Vendor Security Requirements

SECTION 1 – ALL WPS AREAS.

- A. All Vendor personnel (“Contractors”) who require **unmonitored access to WPS systems** must: (a) consent to a background check conducted by WPS and notify WPS Human Resources in writing of all felony convictions within thirty (30) days of conviction, (b) sign the WPS Health Solutions Non-Employee Confidentiality Agreement every 365 days, (c) abide by all applicable WPS privacy and security requirements, (d) follow the WPS Health Solutions Facility Rules for Visitors while on WPS premises, (e) complete and sign a Conflict of Interest Questionnaire every 365 days, and (f) complete HIPAA Privacy, WPS Code of Conduct, and Records Retention training at the beginning of his/her assignment to WPS and refresher training at least once every 365 days thereafter.

Vendor shall notify Contractors of these requirements and require them to complete and submit the WPS Background Check Authorization Form at least 10 days before starting their assignment with WPS. If any Contractors fail to authorize a background check, they will not be granted the requested access.

In lieu of Contractors consenting to a background check by WPS, Vendor may submit the WPS Health Solutions Background Check Attestation indicating that Vendor has completed the required background checks within the last 5 years. Vendor must retain background check results for 3 years after the completion of the Contractor’s assignment at WPS. Vendor should not produce the results of the background check unless requested by WPS. Contact WPS Human Resources with any questions regarding background checks.

A Contractor is not eligible for assignment at WPS if (a) convicted of a felony in the prior 7 years substantially related to his/her job, (b) listed in a sex offender registry database and the conviction is substantially related to his/her job, or (c) named on the U.S. Department of Health & Human Services Office of Inspector General (OIG) List of Excluded Individuals and Entities, the Office of Foreign Assets Control (OFAC) Specially Designated Nationals List, or the System for Award Management (SAM) excluded parties list. Professional references and education verification are also required as part of the background check.

- B. Contractors who require **unescorted access to WPS premises but no unmonitored access to WPS systems** must (a) sign the WPS Health Solutions Non-Employee Confidentiality Agreement every 365 days, (b) abide by all applicable WPS privacy and security requirements, and (c) follow the WPS Health Solutions Facility Rules for Visitors while on WPS premises.

Vendor must complete and submit the WPS Attestation for Contractors with No Systems Access and, upon request, provide documentation to WPS showing that such Contractors have undergone a full background check within the last 5 years and/or the background check results.

A Contractor will not be eligible for assignment at WPS if (a) convicted of a felony in the prior 7 years that is substantially related to his/her job, (b) listed in a sex offender registry database and the conviction is substantially related to his/her job, or (c) named on an OIG, OFAC, or SAM excluded parties list.

Vendor must retain background check results for 3 years after the completion of the Contractor’s assignment at WPS. Vendor should not produce the results of the background check, unless requested by WPS. Contact WPS Human Resources with any questions regarding background checks.

- C. Vendor must notify WPS as soon as reasonably practicable, but no later than 72 hours after it becomes aware that a Contractor with unmonitored access to WPS systems or unescorted access to WPS premises is no longer employed by or contracted with Vendor, is on a leave of absence, or will no longer be performing services for WPS.

SECTION 2 – ADDITIONAL COMMERCIAL HEALTH INSURANCE REQUIREMENTS. Contractors performing services that support WPS’s Health Insurance Division, including Contractors in IT roles, are not eligible for assignment at WPS if they have ever been convicted of a felony involving dishonesty or breach of trust.

SECTION 3 – ADDITIONAL MEDICARE REQUIREMENTS. Contractors performing services that require access to or use of Centers for Medicare and Medicaid Services (CMS) data or systems must: (a) complete Medicare Security Training, (b) only access CMS data on U.S. soil, and (c) have lived in the United States for at least three of the last five years.

Additionally, Contractors performing services that involve Medicare program funds, directly or indirectly, must also undergo a credit check and employment verification.

SECTION 4 – ADDITIONAL TRICARE REQUIREMENTS. Contractors performing services that require access to or use of TRICARE data must: (a) be United States citizens; and (b) undergo a credit check.

Additionally, Contractors performing services that require access to U.S. Department of Defense (DoD) systems (i.e., Contractors in ADP/IT positions) must also undergo a successful government background security screening by completing

the Questionnaire for National Security Positions (Office of Personnel Management Standard Form 86) and submitting to fingerprinting conducted by certified WPS employees or an authorized government agency.

SECTION 5 – ADDITIONAL VETERANS AFFAIRS REQUIREMENTS. Contractors performing services that require access to or use of Veterans Affairs (VA) data or systems must undergo employment verification.

SECTION 6 – ADDITIONAL REQUIREMENTS FOR ADMINISTRATIVE ACCESS. Contractors performing services that require administrative access to WPS systems must: (a) complete Medicare Security Training; (b) only access CMS data on U.S. soil; (c) have lived in the United States for at least three of the last five years; (d) be United States citizens; (e) undergo a credit check; and (f) undergo a successful government background security screening by completing the Questionnaire for National Security Positions (Office of Personnel Management Standard Form 86) and submitting to fingerprinting conducted by certified WPS employees or an authorized government agency.