

## WPS Security Requirements

### Section 1 – All WPS Areas

- A. Any Vendor personnel (“Contractors”) who require **unescorted access to WPS premises but no unmonitored access to WPS data or systems** must (a) sign the WPS Non-Employee Confidentiality Agreement every 365 days, (b) abide by all applicable WPS privacy and security requirements, and (c) follow the WPS Companies Facility Rules while at WPS facilities.

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

- Federal criminal database search
- Government debarment database searches (OIG, OFAC and SAM)

The criminal search portions of the background check must be performed by an approved third-party background check vendor. The remaining portions of the background check may be completed by the Vendor. Contractors will not be eligible for assignment at WPS if convicted of a felony that is substantially related to their job or if named on an OIG, OFAC or SAM excluded parties list.

Vendor must retain background check results for three 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. Questions or more information regarding background checks should be directed to WPS Human Resources.

- B. All Contractors who require **unmonitored access to WPS systems** must (a) consent to a background check conducted by WPS; (b) sign the WPS Non-Employee Confidentiality Agreement every 365 days, (c) abide by all applicable WPS privacy and security requirements, (d) follow the WPS Companies Facility Rules while at WPS facilities, (e) complete and sign a Conflict of Interest Questionnaire every 365 days, and (f) complete HPA 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.

The background check will be at WPS’ expense and will include a National Criminal File Search conducted by a third-party consumer investigation reporting agency and a review of governmental agency databases, court record repositories, and any other source required to verify the person’s identity and background and to verify that the person is not on the U.S. Department of Health & Human Services Office of Inspector General excluded parties list, the Office of Foreign Assets Control Specially Designated Nationals List, or the U.S. System for Award Management excluded parties list. Vendor shall notify applicable personnel of this requirement and require them to complete and submit the WPS Background Check Authorization Form to WPS at least ten (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.

- C. Vendor must notify WPS as soon as reasonably practicable, but no later than:

- Two (2) business days after it becomes aware that a Contractor with unmonitored access to WPS systems is no longer employed by or contracted with Vendor, is on a leave of absence or will no longer be performing services for WPS; and
- Five (5) business days after it becomes aware that a Contractor with unescorted access to WPS premises (but no unmonitored WPS system or data access) 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 Medicare Division Requirements**

Any Contractor performing services under a WPS Medicare contract must also complete Medicare Security Training.

## **Section 3 – Additional TRICARE Division Requirements**

As a contractor with the U.S. Department of Defense (DoD) TRICARE program, WPS must comply with DoD security requirements. DoD requires the following for any person accessing DoD systems or data, whether or not the person is directly employed by WPS:

- The person must be a United States citizen.
- The person must submit to a full government background check by completing the Questionnaire for National Security Positions (Office of Management and Budget Standard Form 86).
- The person must submit to fingerprinting conducted by approved and certified WPS employees or an authorized agency.