

WPS Health Solutions 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, (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 Facility Rules while at WPS facilities, (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 (i) convicted of a felony in the prior 7 years substantially related to his/her job, (ii) listed in a sex offender registry database and the conviction is substantially related to his/her job, or (iii) named on the U.S. Department of Health & Human Services Office of Inspector General (OIG) excluded parties list, the Office of Foreign Assets Control (OFAC) Specially Designated Nationals List, or the U.S. 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 Facility Rules.

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 (i) convicted of a felony in the prior 7 years that is substantially related to his/her job, (ii) listed in a sex offender registry database and the conviction is substantially related to his/her job, or (iii) 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 MEDICARE REQUIREMENTS. Contractors performing services under a Medicare contract must also complete Medicare Security Training. Performance of services accessing Medicare data must be on U.S. soil. Access also may require a credit check for egregious financial history and/or confirmation that the Contractor has lived in the United States for at least three of the last five years.

SECTION 3 – ADDITIONAL REQUIREMENTS FOR TRICARE AND ADMINISTRATIVE ACCESS. Contractors performing services that require access to or use of TRICARE data must be United States citizens. Contractors performing services under a TRICARE contract and accessing U.S. Department of Defense (DoD) systems, or who require administrative access to WPS systems, must:

- Be United States citizens;
- Submit to a full government background check by completing the Questionnaire for National Security Positions (Office of Management and Budget Standard Form 86);
- Submit to fingerprinting conducted by certified WPS employees or an authorized agency; and
- Undergo a credit check that screens for egregious financial history.