

BACKGROUND CHECK REQUIREMENTS FOR VENDORS, CONTRACTORS AND SUPPLIERS¹

A. Definitions.:

“*Customer*” means a Kaiser Permanente entity purchasing goods or services from Supplier.

“*KP*” means the integrated health care delivery organization doing business as Kaiser Permanente®, which includes Customer and its affiliates.

“*Supplier*” means a vendor, contractor or supplier who is providing goods and/or services to a Customer.

“*Supplier Resource*” means a contractor or employee of Supplier if one or more of the following criteria are met:

1. The individual has duties that require a regular presence (50% or more of work time or 8 hours per month) in a KP facility;
2. The individual will have access to KP’s computer network; or
3. The individual’s responsibilities include acquiring, generating or maintaining personally identifiable information (of any kind) for KP.

B. Requirements. Supplier must ensure that each Supplier Resource obtains a “passing” result on all required components of the Standard Background Check and, if applicable, the International Background Check described below prior to the commencement of services:

1. U.S. Background Check:

- o Social Security Number Verification (SSNV)
- o FACIS – Level 1 Search (includes LEIE/SAM/OFA)
- o Employment Verification - 7 Year scope (only if a certain amount of employment experience is needed for this work; otherwise it does not need to be verified)
- o Education Verification – Highest Degree Earned (only if a certain amount of education experience is needed for this work; otherwise it does not need to be verified)
- o U.S. Felony & Misdemeanor County Criminal Check*
- o U.S. Federal Criminal*

*U.S. Criminal Background Check Criteria: The following U.S. criminal courts must be searched for each county the Supplier Resource has lived in for the last 7 years (Areas of residence will be established by information provided by the Supplier and what is stated on his or her job application):

- U.S. Federal & State Courts - Search of all district courts, Department of Corrections (inmates & release files, probation & parole), administrative office of courts, individual counties, municipal courts, state specific criminal record repositories, supplier proprietary criminal record data, sex offender registry records for 50 states plus Washington DC.
- Superior Court (Felonies) & Municipal Court (Misdemeanors) -Search to include all counties where the Supplier Resource worked and lived using the home and

¹ “Offshore” vendors must comply with the background check requirements set forth in the *KP Offshore Vendors Controls & Compliance Handbook*.

business addresses listed by the Supplier Resource and those discovered in the social security verification process.

2. International Background Check: In addition, Supplier must perform the international (Interpol) background check described below for any period of time that the Supplier Resource has lived outside the U.S. during the previous 7 years:
 - Felony & Misdemeanor County Criminal Check (or national equivalency)
 - Federal Criminal (or national equivalency)
 - Employment Verification**
 - Education Verification – Highest Degree Earned**

**A Supplier candidate's I-797 document will be accepted as verification of international employment and/or education if Supplier is unable to verify said international employment and/or education. Supplier must have records of 3 failed attempts to validate the international employment and/or education prior to the acceptance of the I-797.

C. Adverse Results. If the results from the criminal background check described above reveal misdemeanor or felony convictions, an individual assessment should be completed based on the EEOC guidelines to determine whether a conviction is job related and consistent with business necessity. The analysis should include: the nature and gravity of the offense and conduct, the time that has passed since the offense or conduct and/or completion of the sentence; and the nature of the position. The supplier Resource has not "passed" if the conviction demonstrates behavior that could adversely affect safety in the Customer's workplace, security of the Customer's assets or disruption of the work environment. Names that are a match on the FACIS Level 1 Search do not pass.

D. Frequency. Supplier must repeat the criminal background check for each Supplier Resource that is an independent contractor or contingent/temporary staff if the Supplier Resource has not has not provided services to Customer or KP during the previous 6 months.

E. Audit. Supplier is responsible to maintain readily accessible background check records that would permit a reasonable audit by Customer for a period of three (3) years.

F. Modifications. The background check requirements set forth herein are subject to change by Customer from time to time to reflect changes in Customer's background check policy for its employees. These requirements shall not be construed to require any violation of federal or state law or collective bargaining agreements.