

**BACKGROUND CHECK REQUIREMENTS  
FOR VENDORS, CONTRACTORS AND SUPPLIERS<sup>1</sup>**

**A. Definitions.**

“*Healthcare Worker*” 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) in a health care facility, including a medical office or skilled nursing facility; or
2. The individual provides health care services to KP members or patients or is in direct physical contact with KP members or patients.

“*PII/PHI Worker*” means a contractor or employee of Supplier who has access to personally identifiable information (PII) or protected health information (PHI) of KP employees, members or patients.

“*KP*” means the integrated health care delivery organization doing business as Kaiser Permanente®.

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

**B. Requirements.** Supplier must ensure that each Healthcare Worker and PII/PHI Worker obtains a “passing” result on the applicable requirements described below prior to the individual starting to provide goods/services to KP:

Type of Background Check	When Required
Social Security Number Verification (SSNV)	✓ Always
FACIS – Level 3 Search (includes LEIE/SAM/OFA)	✓ Always
Registered Sex Offender List	Only required if individual has direct physical contact with KP members or patients
Employment Verification - 7 Year scope	Only required if individual needs a certain amount of employment experience for the work
Education Verification – Highest Degree Earned	Only required if individual needs a certain amount of education experience for the work
U.S. Felony & Misdemeanor County Criminal Check*	✓ Always
U.S. Federal Criminal*	✓ Always

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

\*U.S. Criminal Background Check Criteria: The following U.S. criminal courts must be searched for each county where the individual has lived and worked for the last 7 years (Areas of residence will be established by information provided by the Supplier and what is stated on the individual's 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 individual worked and lived using the home and business addresses listed by the individual and those discovered in the social security verification process.

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 individual has not "passed" if the conviction demonstrates behavior that could adversely affect safety in KP's workplace or healthcare facility or the security of KP's PHI/PII. Names that are a match on the FACIS Level 3 Search do not pass.

D. Frequency. Supplier must repeat the criminal background check for each individual that is an independent contractor or contingent/temporary staff if the individual has not provided services to 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 KP for a period of three (3) years.

F. Modifications. The background check requirements set forth herein are subject to change by KP from time to time to reflect changes in KP'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.