

Mass General Brigham Background Check Requirements for Vendors/Suppliers

Mass General Brigham requires vendors ("Business") to perform certain background checks, identified below, for their employees or staff ("Business Employees") who will meet **any** of the following criteria:

- ✓ Have access to Protected Health Information (PHI) of patients
- ✓ Work on site at a Mass General Brigham location for more than three weeks (individuals on-site for less time are required to be accompanied by a Mass General Brigham employee at all times)
- ✓ Will be serving in a temporary staffing capacity

Business shall complete such Background Checks **before** a Business Employee has access to PHI or comes to Customer site. Business shall notify their employees that these background checks will be performed by Business and Business must maintain documentation that background checks were successfully completed. Customer has the right, with reasonable notice, to audit the Business for compliance with these requirements including, but not limited to, requesting documentation of the organization's background check processes and requesting specific attestation about the compliance related to Business Employees working on behalf of Customer. Customer will not request to see actual background check results, except as described below.

Business Employees whose Criminal Background Screen, National Sex Offender Check, Exclusion Check, or state checks (if applicable) return a result other than "no record" are not permitted to work on behalf of Customer in a role that requires PHI or onsite access without prior approval, in writing, from Customer's Police & Security or Compliance Departments. Customer must be notified **via secure/encrypted email**, consistent with Customer's instructions as provided in the attached Background Check Requirements and await a written response. Alternatively, Business may choose not to assign an individual to Customer and then need not provide Customer any information. In addition, for any temporary staffing agency who is unable to verify VIII. and IX., on the attached Background Check Requirements, the employee may not be placed at any Mass General Brigham location.

If, at any time, Customer determines, in good faith, that: (a) based on the result(s) of any of the components of a Background Check or (b) any other relevant information that comes to the attention of Customer, it would be inappropriate for a Business Employee to perform any of the Services hereunder, Customer may require Business to terminate immediately such Business Employee's assignment for Customer and replace such Business Employee with a Business Employee acceptable to Customer. If Business is unable or unwilling to remove and replace such Business Employee, Customer may (i) immediately terminate the specific Statement of Work ("SOW") under which such Business Employee has been engaged; or (ii) immediately terminate the underlying Agreement. If at any time Business determines for any reason that such Business Employee should not provide Services to Customer, Business shall immediately notify Customer, terminate such Business Employee's assignment for Customer, and replace such Business Employee with another Business Employee acceptable to Customer. In any event, Customer will not be responsible for expenses incurred by Business in connection with any such termination or replacement described in this paragraph.

Customer's affiliates, as applicable, may have additional requirements related to their specific location/business policies. Business shall request that the applicable Customer affiliate inform Business of any such additional requirements prior to beginning work.

Any/all communications containing personal information must be sent via Secure/ Encrypted email.

Questions about these standards should be directed to Police & Security at: policecori@partners.org

Background Check Requirements

Business must perform the following background checks and maintain documentation for duration of Customer engagement. Business should NOT submit documentation to Customer unless there is a finding other than “no result” for II-VII outlined below. Findings for II-VII must be submitted for further consideration only **via Secure/Encrypted email** or Business may choose not to have individual involved in Customer engagement.

I. Social Security Trace

Shows where an individual lived, worked and/or went to school for the past 7 years

II. Criminal Background Screen

Multi-state criminal background check by counties lived, worked and/or attended school for past 7 years. Any record(s) must be vetted with MGH/Security for final decision **via secure/encrypted email** to: policecori@partners.org

III. National Sex Offender Check

Search the national sex offender registry (www.NSOPW.gov). Potential matches must be vetted with MGH/Security for a final decision **via secure/encrypted email** to: policecori@partners.org

IV. Exclusion Check

Search OIG, GSA and MassHealth and NH Medicaid databases. Mass General Brigham Compliance, Audit & Business Integrity must vet potential matches for a final decision. Send potential match details, subject’s DOB and last four digits of SSN in a **secure/encrypted email** to: PHSComplianceExclusion@partners.org

Government Websites:

MassHealth: <https://www.mass.gov/service-details/learn-about-suspended-or-excluded-masshealth-providers>

NH Medicaid: <https://www.dhhs.nh.gov/documents/medicaid-provider-exclusion-and-sanction-list>

OIG: <https://exclusions.oig.hhs.gov/Default.aspx>

GSA: <https://sam.gov/content/exclusions>

V. Massachusetts CORI (required for MA or RI based facilities)

Provides criminal history for the state of MA going back to age 17. This background check is conducted through the Massachusetts CORI system (<https://www.mass.gov/massachusetts-criminal-offender-record-information-cori>). Any finding(s) to be vetted with MGH/Security for a final decision **via secure/encrypted email** to: policecori@partners.org

VI. New Hampshire State Checks: (required for NH based facilities)

NH Criminal Background check (performed by the NH State Police): <https://www.nhsp.dos.nh.gov/our-services/criminal-records/criminal-history-record-requests>

NH BEAS record check: <https://www.dhhs.nh.gov/sites/g/files/ehbemt476/files/documents/2021-11/beas-consent.pdf>
Any record(s) to be vetted with MGH/Security for a final decision via secure/encrypted email to: policecori@partners.org

VII. Maine State Checks: (required for ME based facilities)

Maine Background Check Center Check: <https://backgroundcheck.maine.gov/DHHS/MBC/>

Child Protective Services (CPS) check: <https://apps1.web.maine.gov/cgi-bin/online/carbc/user/start>

Adult Protective Services (APS) check: This is an email request to APScheck.dhhs@maine.gov & include: this is an APR record check for: Name of individual, DOB, Current Home Address, Agency Name and Agency Rep & Title.

Any record(s) to be vetted with MGH/Security for a final decision via secure/encrypted email to: policecori@partners.org

ADDITIONAL REQUIREMENTS FOR TEMPORARY STAFFING AGENCIES ONLY**VIII. Education**

Employer must verify highest level education achieved (HS/AS/BA/MA/advanced degree and/or certification if required for the position). If not able to verify stated education, then the individual is not eligible to be placed at a Mass General Brigham site

IX. Professional Licenses/Certification

Employer must verify individual has a current professional license and/or certification, if required for the position