



8.7.11 Contractors and Vendors

Chapter 8 - Health & Safety	Original Effective Date: October 2003
Section: 8.7 University Police	Date Last Reviewed: September 2014
Responsible Entity: Chief, University Police	Date Last Revised: September 2014

I. Purpose

To promote campus safety and the security of personnel and UT Health San Antonio (UTHSA) property, it is the policy of the UTHSA to ensure criminal history checks and sanction checks are completed on contractors, and subcontractors, providing services to the University.

II. Scope

This policy applies to all faculty, staff, students, residents, healthcare providers, researchers, contractors, or any other individual (collectively, Workforce Member, including employees and non-employees).

III. Policy

UTHSA will require the contractor to provide a [Contractor Criminal Background Check Certification](#) and UTHSA shall conduct criminal background checks before the contractors and vendors, and their agents or employees, are allowed on campus.

Sanction checks will be completed prior to contracting or hiring a contractor or vendor company, not the individual employees of the company.

A. Criminal History Checks

If a contractor or subcontractor is on campus for three (3) consecutive days or less, and escorted by a UTHSA employee at all times, no criminal background check is required.

If a contractor, vendor or a subcontractor and their agents or employees are on campus for more than three (3) consecutive days, a criminal background check will need to be completed. When a contractor is under consideration for performing services on the UTHSA campus the sponsoring department will notify the Purchasing Office to

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determine the need for a “Contractor Criminal Background Check Certification”. The Purchasing Office will include the “Contractor Criminal Background Certification” requirement in the Purchase Order. This completed form required by the contractor will be maintained in the Purchasing Office.

The contractor or subcontractor and their agents or employees will ensure their employees considered for continuing duties on our campus do not have a disqualifying offense defined in the Contractor Criminal Background Certification.

In addition, there is a federal requirement that UTHSA check the List of Specially Designated Nationals and Blocked Persons when contracting with anyone.

B. Sanction Checks

UTHSA does not knowingly hire an independent contractor, with or without pay, that is listed by a federal agency as excluded, suspended, or otherwise ineligible for participation in federal programs to hold any position or render any services for which the individual’s or entity’s compensation or the services rendered by the individual or entity are paid in whole or in part, directly or indirectly, by a federal health care program or otherwise with federal funds. In order to carry out this policy, UTHSA makes a reasonable inquiry into the status of any potential independent contractor. Such a reasonable inquiry is made during the hiring process and includes at a minimum a review of the Office of Inspector General’s (OIG’s) Cumulative Sanctions Report and the General Services Administration’s (GSA’s) list of parties excluded from federal procurement and non-procurement programs.

C. Identification Cards

See the Institutional Handbook of Operating Procedures (IHOP) policy on the appropriate issuance of identification cards at Policy [8.7.9 Keys, Identification Cards and Access Requests](#).

D. Additional Requirements

See IHOP, Policy [6.1.4 Payments to Consultants and Non-Employees](#), for additional institutional requirements when engaging the services of a contractor, subcontractor or vendor.

IV. Definitions

Contractor - A person, company or entity that furnishes or performs services for construction or major repairs.

Subcontractor - A company or entity that a contractor assigns obligations of a contract to.

V. Related References

There are no related documents associated with this Policy.

VI. Review and Approval History

- A. The approving authority of this policy is the University Executive Committee.
- B. The review frequency cycle is set for three years following the last review date, a time period that is not mandated by regulatory, accreditation, or other authority.

Effective Date	Action Taken	Approved By	Date Approved
10/2003	Policy Origination		
09/2014	Policy Revision		