

The Background Screening Credentialing Council (BSCC) volunteer members drafted the accreditation tip for Clauses 6.10 and 6.11 of the BSAAP Standard, version 2.0, effective April 6, 2018. This tip does not constitute a legal opinion of the BSCC.

TITLE: Clause 6.10 Professionalism and Proficiency Training

Clause 6.10 states: CRA must have and follow procedures to provide initial and ongoing training to CRA workers, where training is commensurate with specific worker role and responsibilities. CRA must retain records of such training.

Training should also be conducted of CRA's sub-contractors. For clarity, sub-contractors refers to those workers directly engaged by the CRA to perform the work of their business. This does not refer to sub-contractors more commonly referred to as vendors or researchers who deliver services to the CRA.

This training can either be done by the CRA directly, or be done as a requirement of the sub-contractor engagement contract in compliance with the CRA's requirements and proof of training provided to CRA.

The Attributes of and Suggestions for Onsite Audit for Clause 6.10 of the BSAAP Standard, Version 2.0, Effective April 6, 2018 provides:

CRA must provide information and training to workers which are specific based on worker role and responsibilities. CRA must provide training on general requirements of confidentiality, professionalism, accuracy, and worker's role as a representative of the CRA. CRA must retain records of all such training. Training methods may include, but are not limited to: 1) written material, 2) online training, 3) training classes/webinars, 4) one-on-one training sessions, and/or 5) on-the-job training. Auditor will seek evidence of adherence to policies and procedures.

TITLE: Clause 6.11 Worker Confidentiality, Legal and Compliance Training

Clause 6.11 states: CRA must have and follow procedures to provide initial and annual training to all workers on confidentiality, security and legal compliance practices of the CRA and maintain records of such training.

Training should also be conducted of CRA's sub-contractors. For clarity, sub-contractors refers to those workers directly engaged by the CRA to perform the work of their business. This does not refer to sub-contractors more commonly referred to as vendors or researchers who deliver services to the CRA.

This training can either be done by the CRA directly or be done as a requirement of the sub-contractor engagement contract in compliance with the CRA's requirements.

The Attributes of and Suggestions for Onsite Audit for Clause 6.11 of the BSAAP Standard, Version 2.0, Effective April 6, 2018 provides:

CRA must provide initial and annual training to CRA workers regarding confidentiality, security, and legal compliance practices by using one or more methods which include, but are not limited to: 1) written material, 2) online training, 3) training classes/webinars, 4) one-on-one training sessions, and/or 5) on-the-job training. CRA must retain records of such training. Auditor will seek evidence of adherence to policies and procedures.

A **Non-Conformity** sometimes identified for these clauses might include a CRA's inability to effectively demonstrate what training was conducted, either by showing materials, program, webinar, or training resources. Additionally, there may be a lack of proof that training was conducted. This proof may include a list or recording of the individuals who completed the training, what type of training each individual received, and the date received.

In the case of Clause 6.11, the training must be done at the time of onboarding into a position, as well as annually thereafter.

The audit criteria for clause 6.10 provides:

CRA must provide information and training to workers which are specific based on worker role and responsibilities. CRA must provide training on general requirements of confidentiality, professionalism, accuracy, and worker's role as a representative of the CRA organization. CRA must retain records of all such training. Training methods may include, but are not limited to: 1) written material, 2) online training, 3) training classes/webinars, 4) one-on-one training sessions, and/or 5) on-the-job training. Auditor will seek evidence of adherence to policies and procedures.

The audit criteria for clause 6.11 provides:

CRA must provide initial and annual training to CRA workers regarding confidentiality, security, and legal compliance practices by using one or more methods which include, but are not limited to: 1) written material, 2) online training, 3) training classes/webinars, 4) one-on-one training sessions, and/or 5) on-the-job training. CRA must retain records of such training. Auditor will seek evidence of adherence to policies and procedures.