

The Background Screening Credentialing Council volunteer members drafted the following response to questions about the BSAAP Standard, version 2.0, effective April 6, 2018. This letter is an informal discussion of the question posed and does not constitute a legal opinion of the BSCC.

Title: Office Space Opinion Letter

Issue: Can an office space within a WeWork location (or other co-working facility) qualify as a “primary operating center?”

Response: The BSAAP Standard does not detail the conditions of “primary operating center” except to stipulate the entity seeking accreditation, regardless of its physical location(s), will be subject to the same audit expectations outlined in the Policies and Procedures.

This means that whether the entity’s primary operating center is in a co-working facility or a more traditional facility, all security and other requirements of the Standard which apply to the physical aspects of the operating center must be met by the entity’s space within the facility. For example, a space within a co-working center that is not securely partitioned from areas not controlled by the entity would likely not meet the requirements of the Standard.

For the avoidance of doubt, the requirements of the Standard must be met for the duration of the accreditation. If the entity seeking accreditation is temporarily operating from a co-working facility and ends that arrangement, it would need to establish a new primary operating center that continues to meet the requirements of the Standard to maintain its accreditation.