

The Background Screening Credentialing Council

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: Product offerings, vendors, professionalism/proficiency

Question 1: For our company, we do not order any educational verifications (as described in 5.3 Accredited Academic Institutions). How do [we] show compliance with a standard where this is not a service we offer? Can we simply say we do not offer educational verification and that would be good enough?

Response 1: This is addressed in the BSAAP Policies and Procedures Guide, Section IV.E.1.

Accreditation - for five (5) years may be granted for agencies that have demonstrated conformity with all clauses of the current BSAAP Standard, provided that the Accredited Agency successfully completes its Interim Surveillance Audit during the third year of accreditation. An agency not providing all services described in all clauses of the BSAAP Standard may nevertheless be granted accreditation if it demonstrates that it has addressed all policies and procedures which would be necessary should it determine to provide all services covered by the BSAAP Standard.

As noted above, an agency not providing all services described in all clauses of the BSAAP Standard may nevertheless be granted accreditation if it demonstrates that it has addressed all policies and procedures which would be necessary should it determine to provide all services covered by the BSAAP Standard.

Question 2: There are a number of other standards where the process (like 2.18 Automated Reporting System) is really maintained by the vendor we use to order the consumer report. Would we still be required to have a policy/procedure for a process that is handled by our vendor?

Response 2: The BSAAP Standard with Audit Criteria, version 2.0, Measure and Documentation Typically Subject to Desk Audit criteria, states:

CRA must provide written policy, procedure, or other documentation defining methods used to monitor accuracy of automated reporting systems.

The following policies and procedures would need to be submitted for audit:

1. The policy your organization uses to monitor the accuracy of automated reports provided by the vendor; and
2. A copy of the vendor(s) procedures it uses to monitor accuracy of automated reporting systems.

Question 3: Also, for 6.10 Professionalism and Proficiency Training – the attributes say the CRA must provide training on professionalism. How would PBSA define professionalism?

Response 3: Professionalism is defined in the Merriam-Webster dictionary as:

The conduct, aims, or qualities that characterize or mark a profession or a professional person.

In addition, the PBSA Code of Conduct is certainly a key part of professionalism training that would be expected for any PBSA accredited company.

Question 4: As part of the same clause 6.10, there is another attribute “worker’s role as a representative of the CRA organization” that were not quite clear on what you are looking for here either. Can you provide any addition insight as to what you mean by this attribute?

Response 4: The BSAAP Standard with Audit Criteria, version 2.0, Attributes of and Suggestions for Onsite Audit, states:

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 worker’s role as a representative of the CRA organization would include general training requirements for the employee’s working role in your organization as well as any additional training you deem appropriate based on the worker’s job duties (i.e. individuals working in IT, customer service, public records each have different unique job duties that would require training specific to their job).

Thank you for submitting your inquiry and giving the BSCC an opportunity to review. We believe we have responded fully to your inquiry. Please let us know if you have any further questions.