

*The Background Screening Credentialing Council*

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The Background Screening Credentialing Council has drafted the following response to a question we have received regarding the US Employment Screening / General Background Screening BSOAP Standard, this letter applies to US Version 2.0, 3.0 and General Version 1.0. This response is provided for *educational purposes only* and does not constitute legal advice, express or implied, of the BSCC, or the Professional Background Screening Association. Consultation with legal counsel is recommended in all matters of employment law.

For the purposes of this Letter, and to ensure our response applies to both Standards, the terms Organization and CRA may both be used.

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**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:** This is addressed in the BSOAP 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 BSOAP 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 BSOAP 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 BSOAP Standard.*

As noted above, an Organization/CRA not providing all services described in all clauses of the BSOAP 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 BSOAP 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:** The Measure and Documentation Typically Subject to Desk Audit criteria, states:

*Organization/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:

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1. The policy your Organization/CRA uses to monitor the accuracy of automated reports provided by the vendor; and/or
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:** 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 organization” that were not quite clear on what you are looking for here either. Can you provide any additional insight as to what you mean by this attribute?

**Response:** The Attributes of and Suggestions for Onsite Audit, states:

*The Organization/CRA must provide information and training to employees which are specific based on employee’s role and responsibilities. The Organization/CRA must provide training on general requirements of confidentiality, professionalism, accuracy, and employee’s role as a representative of the Organization/CRA. The 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 Organization/CRA would include general training requirements for the worker’s role in your Organization/CRA as well as any additional training you deem appropriate based on the job duties (i.e. individuals employed in IT, customer service, or public records each have different unique duties and responsibilities that require training specific to their role).

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.