

Background Screening Agency Accreditation Program (BSAAP) Standard - Effective April 6, 2018 Clause Additions and Revisions

April 10, 2018

A high level comparison of the original BSAAP Accreditation Standard (Version 1.0) and the newly approved BSAAP Accreditation Standard, Version 2.0, effective April 6, 2018, is below. Note that many of the proposed changes are grammatical and/or add clarity; such changes are not noted in the high level comparison below.

Note: Each clause noted with an asterisk (*) includes updated content within the clause itself.

- Throughout document. *Clauses updated from "shall have a [condition]" to "must have and follow [condition]"* within the clause/audit criteria.
- Throughout Sections 5 and 6. Updated so that CRA must provide evidence and adherence to procedures, including training records within the onsite audit criteria.

SECTION 1

- **Clause 1.1: Information Security Certification** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 1.2: Information Security Policy** (*previously Clause 1.1*)
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 1.3: Data Security** (*previously Clause 1.2*)
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 1.4: Intrusion and Data Security** (*previously Clause 1.3*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 1.5: Storage and Backup of Data** (*previously Clause 1.4*)
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 1.6: Access Protocol** (*previously Clause 1.5*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 1.7: Electronic Access Control** (*previously Clause 1.6*)
- ***Clause 1.8: Physical Security** (*previously Clause 1.7*)
- ***Clause 1.9: Consumer Information Privacy Policy** (*previously Clause 1.8*)
- ***Clause 1.10: Unauthorized Browsing** (*previously Clause 1.9*)
- ***Clause 1.11: Record Destruction** (*previously Clause 1.10*)
- ***Clause 1.12: Sensitive Data Masking**

SECTION 2

- **Clause 2.1: Compliance with Law and Regulation** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.2: Federal Consumer Reporting Law** (*previously Clause 2.1*)
 - Updated title from "Designated Compliance Person(s)"
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
- **Clause 2.3: State Consumer Reporting Law** (*previously Clause 2.2*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
- **Clause 2.4: Driver Privacy Protection Act (DPPA)** (*previously Clause 2.3*)
- **Clause 2.5: State Implemented DPPA Compliance** (*previously Clause 2.4*)
- **Clause 2.6: Integrity** (*previously Clause 2.5*)
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.7: Prescribed Notices** (*previously Clause 2.6*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 2.8: Agreement from Client** (*previously Clause 2.7*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.9: Client Legal Responsibilities** (*previously Clause 3.1*)
- **Clause 2.10: Client Required Documents** (*previously Clause 3.2*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.11: Disclosure and Authorization** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.12: Adverse Action** (*previously Clause 3.4*)
- ***Clause 2.13: Consumer Disputes** (*Previously Clause 1.11*)
- ***Clause 2.14: Database Criminal Records** (*Previously Clause 1.13*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 2.15: Identification Confirmation** (*previously Clause 4.7*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.16: Full File Disclosure** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.17: Jurisdictional Knowledge** (*previously Clause 4.8*)

- Documentation subject to Desk Audit: Note new guidelines
- Verification for Onsite Audit: Note new guidelines
- Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.18: Automated Searches** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 2.19: Quality Assurance** (*previously Clause 6.11*)
- **Clause 2.20: Reappearance of Inaccurate Information** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 2.21: Quality Analysis** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines

SECTION 3

- **Clause 3.1: Truth in Advertising** (*previously Clause 3.3*)
- **Clause 3.2: Legal Counsel** (*previously Clause 3.5*)
- **Clause 3.3: Understanding Consumer Reports** (*previously Clause 3.6*)
- **Clause 3.4: Information Protection** (*Previously Clause 3.7*)

SECTION 4

- ***Clause 4.1: Public Record Researcher Agreement**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 4.2: Vetting Requirement**
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 4.3: Public Record Researcher Certification**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 4.4: Errors and Omissions Coverage (E&O)**
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 4.5: Information Security**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 4.6: Auditing Procedures**
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines

SECTION 5

- **Clause 5.1: Verification Accuracy**

- Verification for Onsite Audit: Note new guidelines
- Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 5.2: Current Employment**
 - Documentation subject to Desk Audit: Note new guidelines
- ***Clause 5.3: Accredited Academic Institutions**
 - Updated title from "Diploma Mills"
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 5.4: Procedural Disclosures**
 - Documentation subject to Desk Audit: Note new guidelines
- **Clause 5.5: Verification Databases**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 5.6: Use of Stored Data**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 5.7: Documentation of Verification Attempts**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 5.9: Conflicting Data**
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 5.10: Authorized Recipient** (*previously Clause 5.11*)
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines

SECTION 6

- **Clause 6.1: Background Checks for Personnel Charged with Enforcement Policy**
 - New content and updated title
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 6.2: Background Checks for CRA Workers** (*previously Clause 6.10*)
 - New content
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 6.3: Changing Law and Regulation** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 6.4: Insurance** (*previously Clause 6.2*)
- **Clause 6.5: Client Authentication** (*previously Clause 6.3*)
- **Clause 6.6: Vendor Authentication** (*previously Clause 6.4*)
- **Clause 6.7: Consumer Authentication** (*previously Clause 6.5*)

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- Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 6.8: Document Management** (*previously Clause 6.6*)
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 6.9: Employee Certification** (*previously Clause 6.7*)
- **Clause 6.10: Professionalism and Proficiency Training** (*Previously Clause 5.10*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- ***Clause 6.11: Worker Confidentiality, Legal, and Compliance Training** (*previously Clause 6.8*)
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 6.12: Visitor Security** (*previously Clause 6.9*)
- **Clause 6.13: Responsible Party** (*previously Clause 6.12*)
 - Verification for Onsite Audit: Note new guidelines
- **Clause 6.14: Document Control** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Clause 6.15: Ethics Reporting** (*new clause*)
 - Documentation subject to Desk Audit: Note new guidelines
 - Verification for Onsite Audit: Note new guidelines
 - Attributes of and Suggestions for Onsite Audit: Note new guidelines
- **Glossary** (*new*): For purposes of this BSAAP Standard, terms and acronyms have been added with definitions at the end of the document.

The BSAAP Accreditation Standard Version 2.0 with Audit Criteria is available in the [NAPBS Accreditation Download Center](#).