

ACCREDITATION TIP

The Background Screening Credentialing Council (BSCC) has drafted the following accreditation tip for the US Employee Screening BSOAP Standard, this tip applies to US Versions 2.0 and 3.0. 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.

TITLE: Clause 2.7 Prescribed Notices

CRA must have and follow a procedure to provide client current version of all currently required federal notices required by the FCRA, such as those prescribed by the CFPB.

A **Non-Conformity** sometimes identified for this clause is the absence of documentation, process, policy or procedure that provides clients with all federal notices required by the FCRA. These documents may be part of the contracting or implementation stage, may be made available on a website the client can access or other resource location.

The Audit Criteria for Clause 2.7 provides:

CRA must provide documentation describing how required notices are provided to clients. Methods include but are not limited to providing as part of a Client agreement, User agreement or some other document. Per the FCRA, such notices currently include: 1) Notice to Users of Consumer Reports: Obligations of Users under the FCRA, and 2) A Summary of Your Rights Under the Fair Credit Reporting Act. Auditor will seek evidence of adherence to policies and procedures.

We hope the above provides further information and clarification on the information provided in the Standard and may be used to improve your accreditation submission.