

National Association for Information Destruction, Inc.



Custodial Membership/Certification International Application *2018*

World Headquarters
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ABOUT THE CUSTODIAL MEMBERSHIP/CERTIFICATION PROGRAM

NAID Custodial Membership/Certification is a certification of the secure collection, processing, staging/storage and/or transportation of Confidential Customer Material, including but not limited to records, media, or devices during intermediary or temporary custody of said material prior to its eventual destruction by NAID AAA Certified destruction service provider(s).

The NAID Custodial Membership/Certification Program inspects such areas as security, employee hiring and screening, written policies and procedures, and insurance.

Companies seeking NAID Custodial Membership/Certification for the first time are required to submit the most current Custodial Membership/Certification Application and associated fees to NAID Headquarters. Once the application is received complete by NAID Headquarters, an audit is assigned to the auditor to perform the initial audit at the company's location. All audits are performed by security professionals with the Certified Protection Professional (CPP) accreditation. The CPP accreditation is issued by the American Society for Industrial Security.

Once an audit is deemed successful and approved by the NAID Certification Review Board, a certificate is issued to the company. The company is also listed in the membership directory on the NAID website as a Custodial Certified Member. The membership/certification will be effective for one calendar year.

Custodial Certified Members are required to reapply for membership/certification on a yearly basis to keep their Custodial Membership/Certification active. The most current application and associated fees must be submitted to NAID Headquarters prior to the first day of the month in which the current membership/certification expires. After the initial audit for the first year, recertification audits will then be required every other year. During the years in which an audit is required, the process for initial audits will be repeated (see above). For non-audit years, membership/certification will be awarded once a completed application and associated fees are received, prior to the expiration date.

Under the above program, the membership/certification application and associated fees cover only individual locations. If a company seeking membership/certification operates in multiple locations, each location must submit an application and pass an audit to be certified. Custodial Certified Members must specify which location is certified in company literature when referencing the NAID Custodial Membership/Certification Program.

The following packet is designed to help further familiarize applicants with the NAID Custodial Membership/Certification Program and to clarify the specific information required to have a successful audit and maintain membership/certification status. Included are commonly used terms or definitions used in the Custodial Membership/Certification Program, forms/templates required to be used and be available to the auditor conducting the audit, and the Custodial Membership/Certification Application. All forms can also be found at www.naidonline.org. NAID is committed to maintaining the integrity of the Custodial Membership/Certification Program and is here to assist your company in achieving membership/certification status. Any questions or concerns can be directed to certification@naidonline.org

The NAID[®] Custodial Certification Program

DEFINITIONS

The following are definitions of words or terms used in regard to the NAID Custodial Certification Program.

ACCESS INDIVIDUALS/ACCESS EMPLOYEES – Individuals who have access to, or who can grant or authorize access to the Confidential Customer Material to be destroyed at the Company’s location, including but not limited to 1) employees, 2) agents of “sub-contractors” as defined herein, or 3) others providing any type of services to the applicant company that allows access to any area in which Confidential Customer Material is accessible. For NAID Certification, Access Individuals also include officers, directors, owners, partners of the company or other individuals who have access to, can grant access to, or authorize access to the Confidential Customer Material to be destroyed at the Applicant Company’s location.

CONFIDENTIALITY AGREEMENT – An Agreement in which all Access Individuals acknowledge they will keep any Confidential Customer Material and information secure and confidential. A Confidentiality Agreement having concepts substantially similar to the sample document available to all NAID members must be signed by all Access Individuals and Non-Access Employees, and the Agreement must be kept on file by the Company. Where it is not practical to have such an Agreement directly with an individual, a letter from the Subcontractor, verifying that such an Agreement has been executed by any of their agents who would be provided as an Access Individual, would be acceptable.

CONFIDENTIAL CUSTOMER MATERIAL – Documents, papers, records, electronic devices, or other media received by the Company from customers for secure collection, transportation, storage/staging, processing and/or destruction.

CUSTODIAL SERVICES – Intermediary or temporary custody of Confidential Customer Material, including collection, transportation, staging/storing, and/or processing of the material prior to destruction.

EMPLOYMENT HISTORY VERIFICATION – A verification of all prior employment held by an employee of the Company over the past 7 years; the verification may be conducted internally or outsourced, at the discretion of the Company

NAID AAA CERTIFIED SERVICE PROVIDER – A company providing information destruction services that has met all NAID standards regarding security and other operational characteristics for securely destroying confidential material.

NON-ACCESS EMPLOYEES – Employees of the Company who are restricted from access to secure areas and other areas where Confidential Customer Material is accessible or who have not been through, or cannot be fully vetted for the NAID Certification employee screening requirements. These employees must be accompanied, supervised, or escorted by an Access Employee at all times when in presence of Confidential Customer Material to be destroyed. Also see Visitors.

NON-CITIZEN EMPLOYEES – Employees who are not citizens of the country in which the Company location is operated.

VISITORS - All individuals who may enter the secure area/facility or enter an area/facility with Confidential Customer Material and who are 1) not employed by the Company, 2) working as (or for) an independent contractor for the Company, 3) otherwise providing services for compensation to the Company, &/or 4) employees from another division or Company location who have not met all of the NAID Certification Employee Screening requirements and are not wearing a Photo ID badge, are considered Visitors. All Visitors must sign a Visitor log maintained by the Company, be provided a Visitor badge and be escorted or under the supervision of an Access Individual at all times while in the secure building or area with Confidential Customer Material. This includes, but is not limited to, current or prospective clients, service providers such as vending machine distributors, mechanics or technicians, or employees as noted above.

NAID® Custodial Membership/Certification Application

(For companies taking intermediary or temporary custody of confidential material prior to destruction)
2018 International (Outside U.S. and Canada)

COMPANY INFORMATION (as you want it to appear on NAID's website)

Company Name (Max 33 characters): _____
 Audit Contact: _____ Title: _____
 Physical Street Address: _____
 City: _____ State: _____ Postal Code: _____ Country: _____
 Phone: _____ Toll Free: _____ Facsimile: _____
 Email: _____ Website: _____

If different than above, please check and indicate information below:
 Billing Contact Name: _____ E-mail: _____
 Phone: _____ Fax: _____

COMPANY PROFILE:

Federal Employer ID #: _____ Company Name (as per ID): _____
 Year Company Established: _____ # Employees: _____

Type of Company (check one):
 Private Corp. Publicly Held Corp.
 Public Utility Sheltered Workshop/Non-Profit Organization Other (describe): _____

Type of Custodial Operations (check all that apply):
 Records Storage Data Recovery/Forensic Breach Investigation
 Document Scanning/Imaging Online Backup
 Aggregator/Transportation Backup Tape Rotation
 Other (describe): _____

Please answer the following questions: (check yes or no for each)

- | | | |
|--|------------------------------|-----------------------------|
| 1. Do you provide commercial information destruction services?* | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 2. Do you own and/or operate destruction equipment?* | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 3. Do you contract with NAID Certified vendors for destruction of material?*** | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 4. Do employees sign a confidentiality agreement? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 5. Do you screen employees via a background check? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 6. Is access to client confidential materials restricted to employees? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| 7. Do you use closed trucks to transport materials? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

Type of Audit:
 Initial If an initial audit are you using a NAID approved consultant? No Yes
 Name of Consulting Firm: _____ (Consulting firm must be pre-approved by NAID)

Recertification

*To qualify for NAID Custodial Membership/Certification, the Company may not provide commercial information destruction services, nor own or operate destruction equipment.
 ***To qualify for NAID Custodial Membership/Certification, the Company must contract with NAID AAA Certified destruction service provider(s) for eventual destruction of Confidential Customer Material.

NAID Use Only			
New or Recert:	Auditor:	Audit # :	Audit Required: YES NO
Received:	Complete:	DBU:	Expires:



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2018 NAID Custodial Membership/Certification Application Payment Authorization

International Members only – checks will not be accepted

- Application Fee (per site):** US\$1499 Initial application
 US\$1299 Renewal application

COMPANY NAME _____ CITY, STATE/PROV _____

Method of Payment (select one):

- ONE TIME PAYMENT BY WIRE TRANSFER** (send your request for wire transfer information to accounting@naidonline.org)
 ONE TIME PAYMENT BY CREDIT CARD – AmEx / MC / Visa / Discover (complete form below, print out and send via mail or fax.)

NAME ON CARD: _____

BILLING ADDRESS: _____

CREDIT CARD # _____ EXP _____ CVV _____

SIGNATURE _____ DATE _____

Indications of the signature below acknowledge that I am an owner, corporate officer or official representative of the Company submitting this Payment Authorization and that I have full authority to execute this agreement.

NAME (PRINT): _____ TITLE: _____

SIGNATURE: _____ DATE: _____

NAID USE ONLY				
Audit #:	New/Recert:	App Rcvd:	Acct Rcvd:	Processed:

Employment Information Disclaimer

All organizations applying for NAID Custodial Membership/Certification are expected to comply with any and all national, state, local, or other laws regarding the collection, maintenance and disclosure of employee information, and all laws regulating employment practices, in the jurisdiction governing the location for which the applicant Company is applying for NAID Custodial Membership/Certification or does business. NAID is not responsible for the compliance of its individual NAID Custodial Certified members. Therefore, if the applicant Company believes that anything in this Application or the audit process is, or may be, violative of any laws applicable to the applicant Company, such Company must notify NAID, concurrently with the submission of its NAID Custodial Membership/Certification Application or during the audit, as applicable, of the practices or disclosures which are believed by the applying organization to be in conflict with or violative of any relevant laws. In addition, such notification must include a statement of and citation to the applicable law, code, ordinance or other legal authority. NAID will then analyze the law, code, ordinance or other legal authority to determine whether the applicant Company may be exempted from the particular criteria, practice or disclosure. NAID will notify the applicant Company in writing of such determination.

In addition, a particular requirement of this application, although permissible under applicable laws and regulations, may violate applicable laws and regulations if applied in an impermissible manner, particularly in regard to hiring and retention practices. You should consult your own legal counsel to determine whether your hiring and retention policies and practices comply with all applicable laws and regulations.

Additional Required Materials: (to be submitted with application)

- 1) **Access Individuals and Non-Access Individuals List** - A list of all employees/individuals broken down by "Access Individuals" and "Non-Access Individuals" indicating title/position/responsibility (driver, owner, manager, processing, etc), and date of hire. Also, the Applicant must indicate any employees who are not citizens of the employer's country. (*See the Definitions document for detailed descriptions of Access Individuals and Non-Access Individuals*).
- 2) **List of Vehicles (if applicable)** – A List of all vehicles used for transportation of Confidential Customer Material, including Vehicle make & model, VIN, License Plate Number and the State the vehicle is licensed in.
- 3) **List of NAID AAA Certified destruction service providers** – A list of all NAID AAA Certified companies used for destruction of Confidential Customer Material.
- 4) **Special Consideration Letter (only applicable for hardship or extreme circumstances)** – Letter requesting a temporary or conditional qualification for a specific NAID Custodial Membership/Certification criteria; only considered under extreme or special circumstances, applicant must submit this written request (on Company letterhead & signed by an official Company representative) with their NAID Custodial Membership/Certification Application. The letter must identify the specific criteria, detail the hardship or special circumstance for consideration, and state how the applicant will achieve the intent of the criteria given their circumstances. The NAID Certification Review Board will review and respond to all requests.

We agree with and are bound to the following: (Please sign on bottom to indicate agreement with the following items.)

1. The Company agrees to abide by the NAID Code of Ethics. In order to gain or maintain NAID Custodial Membership/Certification, the Company must be in good standing and not have outstanding debt to the association.
2. Unless and until the Company's services become NAID Custodial Certified, NAID does not endorse or approve the Company's business standards or operations as certified; nor will the Company suggest in any way that they are NAID members or meet NAID Custodial Membership/Certification standards until they complete the NAID Custodial Membership/Certification process and are approved by the NAID Certification Review Board.
3. Owners or Senior management of the Company have read and understand the NAID Custodial Membership/Certification Audit Methodology, which makes clear the documentation, facilities and equipment that each location will be required to have available and immediately accessible to the NAID Auditor.
4. The Company understands that the specifications and fees for NAID Custodial Membership/Certification are subject to change at the discretion of the NAID Board of Directors.
5. All application fees are non-refundable, except in the instance where the NAID Auditor fails to conduct the audit on the date, time and location indicated on the *Auditor Assignment & Confidentiality Agreement* (Appointment) form; and when, in such circumstance, the Company decides to withdraw their application.
6. The Company must reapply for NAID Custodial Membership/Certification on an annual basis, prior to the expiration of the current certification. If the Company chooses not to reapply and/or not to submit to the required audit, it will result in loss of certification.

7. The Company understands and agrees that NAID Custodial Membership/Certification is a certification of the secure collection, processing, staging/storage and/or transportation of Confidential Customer Material, including but not limited to records, media, or devices during intermediary or temporary custody of said material prior to its eventual destruction, and in no way does NAID certify the primary operations (i.e. records storage, document scanning, online backup, tape rotation, etc.) of the Company, nor may it be promoted as such.
8. The Company understands that NAID Custodial Membership/Certification status is public information. Information regarding renewals, lapses, certified operations, Company contact information, and the certification expiration date are displayed on the NAID website and made available to email subscribers.
9. At no time will the label "NAID Custodial Membership/Certification," "NAID Custodial Certification," "NAID Custodial Certified," or "NAID Certified Custodian" be applied, referenced or inferred to facilities or operations of the Company where 1) the location and operating details related to the facility or operation have not been specifically and formally provided to NAID for participation in the NAID Custodial Membership/Certification program, or 2) the facility or operation does not have any involvement related to the collection, transportation, staging/storage, and/or processing of Confidential Customer Materials.
10. At no time will the label "NAID Certification," "NAID AAA Certification," "NAID Certified," or "NAID AAA Certified" be applied, referenced or inferred by the company in any publication or marketing effort, including all written and spoken promotion of services. "NAID Custodial Membership/Certification," "NAID Custodial Certification," "NAID Custodial Certified," and "NAID Certified Custodian" are the only acceptable references.
11. The Company may only use the NAID logos and trademarks that are directly provided by NAID.
12. The Company understands and agrees that all of its employees and agents will refrain from any false or misleading claims, suggestions or references regarding NAID Membership or NAID Certification, and at no time will the Company infer or imply that it is certified to destroy Confidential Customer Material, including but not limited to such claims used in advertising produced in advance and/or in anticipation of certification at some future date.
13. The Company understands and agrees that to qualify for NAID Custodial Membership/Certification neither the Company, nor any of its affiliates or subsidiaries, may perform information destruction services, nor may they own or operate destruction equipment. Further, all destruction services must be performed exclusively by a contracted NAID AAA Certified destruction service provider.
14. The Company agrees that all locations providing custodial services will utilize Company service paperwork or contract that includes Customer acknowledgement, receipt or agreement regarding the specific service being rendered, which specifically references eventual destruction of Confidential Customer Material by a NAID AAA Certified destruction service provider.
15. Any failure to make accessible for inspection all documentation and facilities on the date, time and location identified on the *Auditor Assignment & Confidentiality Agreement* (Appointment) Form may result in failure to be NAID Custodial Certified, forfeiture of the application fee, additional fees for the failures, re-auditing or other expenses, and/or require that we reapply if we want to pursue this credential. Also, failure to meet the criteria on this application may be considered a failure of the audit.
16. At any time during the application and/or audit process or after NAID Custodial Membership/Certification is approved by the NAID Certification Review Board, the Company acknowledges that NAID, its agents and/or the NAID Auditor may investigate or require additional information or documentation from the Company in order to verify information on this Application or the certification criteria.
17. The Company understands and agrees that the Company must maintain at least 90 days of CCTV recordings for each location providing custodial services. If the Company is unable to produce the 90 days of recordings at an audit, the Company may be subject to a reaudit, including associated costs for this reaudit.
18. All of the Company's employees are legally registered to work in the country to which this Application applies, and the Company has all necessary documentation to confirm this (see the Employment Information Disclaimer).
19. The Company understands that it is responsible for ensuring that background checks of current and prospective employees and any use of consumer reports for employment purposes comply with the mandates of the Fair Credit Reporting Act, 15 U.S.C. 1681 et seq.
20. If restrictive employment agreements are in place that would prevent the Company from conducting drug screening and/or criminal record searches, the Company will provide a detailed description of such restrictions with this application.

21. The Company understands and agrees that the NAID Auditor may inspect and test its access control systems related to the facilities, containers and vehicles used for secure collection, transportation, staging/storage and/or processing of Confidential Customer Material during announced and unannounced audits and will not consider such inspection and testing to be a violation of the law, provided such inspection and testing does not result in property damage or the risk of personal injury and is undertaken solely for the purpose of ascertaining compliance with NAID Custodial Membership/Certification.
22. The Company understands that random Unannounced Audits are part of the NAID Custodial Membership/Certification Program. Only if asked and not a hardship, the Company will allow access to a NAID Auditor for purposes of conducting such Unannounced Audits.
23. The Company understands that the NAID Auditor does NOT approve or deny NAID Custodial Membership/Certification. The Auditor's findings will be submitted to the NAID Certification Review Board for approval, determination of remedial or corrective actions and/or additional fees necessary to approve certification, or denial of application.
24. The Company will hold NAID harmless from any claim of damage or loss as a result of the Company's failure to achieve NAID Custodial Membership/Certification.
25. The Company has 14 business days (as determined by the date on the notice sent to the Company regarding the results of an audit) to submit to the NAID Complaint Resolution Council in writing any protest of the results of an audit. The Company understands that the protest should clearly state the perceived reason of the failure to achieve NAID Custodial Membership/Certification and why the finding is incorrect. The Company understands that the NAID Complaint Resolution Council will review the dispute in accordance with the Complaint Resolution Council Guidelines, and any ruling on the appeal is subject to the approval of the NAID Board of Directors. The Company will accept the ruling as final and seek no further remedy, legal or otherwise, except to reapply for NAID Certification at the Company's discretion.
26. The Company understands that the NAID Certification Review Board tracks verified reports of certification non-compliance per company/location and may issue fines and/or sanctions or recommend removal of certification for certification violations, in accordance with the Certification Review Board Guidelines. Such fines and/or sanctions are in addition to any remedial actions ordered by the Certification Review Board (CRB) to bring the operation back into compliance. All fines must be paid within 30 days, unless the Company chooses to appeal the CRB's decision, in which case a formal appeal must be submitted to NAID Headquarters no later than 45 days after the date of notification of the fine/sanction. The Company understands that the NAID Complaint Resolution Council (CRC) will review appeals of CRB fines/sanctions, and the Company will be granted the opportunity to provide spoken testimony within 30 days of the formal submission of the appeal. The NAID Board of Directors will review the CRC's recommendation and make the final decision on all appeals. The Company will accept the ruling of the NAID Board of Directors as final and seek no further remedy, legal or otherwise.
27. If the Company has a change in address, ownership, or the operations/services it offers to Customers any time during a pending NAID Custodial Membership/Certification application or audit, or while the Company is certified, the Company must notify NAID in writing within 15 business days of this status change, and has an ethical responsibility to inform clients (aware of the Company's NAID Custodial Membership/Certification status) of the change.. **Failure to do so may result in fines, sanctions and/or revocation of NAID Certification.**
28. NAID Custodial Membership/Certification is not automatically transferable. In the event of a change in a majority holding in ownership of the Company, or in the event of any change to an ownership structure to an independent, unlicensed status, the Company is responsible for notifying NAID in writing no later than 15 days from the change of ownership or status, or before the next NAID general membership meeting, whichever comes first. The NAID Membership Committee and/or NAID Certification Review Board will determine the transferability and/or new status of the Company location that is the subject of the change in ownership or status no later than 60 days of the change notification.
31. This Application is truthful and accurately represents the daily operating procedures of the Company's secure collection, processing, staging/storage and/or transportation operations. The Company understands that if any of its representatives willfully deceive NAID or a NAID Auditor, the Company could be immediately removed from NAID, or the NAID Custodial Membership/Certification may be revoked.
32. Indications of the signatory's initials above and the signature below acknowledge that I am an owner, corporate officer or official representative of the Company submitting this Application. The undersigned has full authority to request that the Company apply for NAID Custodial Membership/Certification and submit to any requisite audits, with full knowledge of the Company's operation to accurately complete the Application, and the authority to execute this agreement.

Date:

Signed: _____

Print Name: _____ Title: _____

	Initial	Criteria	Audit Methodology
EMPLOYEE REQUIREMENTS			
1.1	<p>Applicant Claims</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p>	<p><i>All Access Employees and Non-Access Employees</i> must have the following on file:</p> <ul style="list-style-type: none"> • Confidentiality Agreement • I-9 Form U.S. employees hired after November 7, 1986 or proper work registration for non-citizens <p><i>(See Employment Information Disclaimer.)</i></p>	<p>The Auditor will request evidence of the appropriate documentation in the employee files as follows:</p> <ul style="list-style-type: none"> • 7 or fewer Access and/or Non-Access Employees: Auditor will view employee files for all Access and Non-Access Employees. <p style="text-align: center;">OR</p> <ul style="list-style-type: none"> • More than 7 Access and/or Non-Access Employees: Auditor will view employee files as a random sample , totaling 25% of the entire Access and Non-Access Employees List, with a minimum of 7 employees and a maximum of 15 employees.
1.2	<p>Applicant Claims</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p>	<p><i>Access Employees</i> must have the below employment screening requirements:</p> <p>When searches are being conducted in places outside of the U.S. every effort should be made to have the searches done at a level comparable to the county and state searches done in the U.S.</p> <ul style="list-style-type: none"> • 7 Year Criminal Record Search: <ul style="list-style-type: none"> ○ Social Security Header Search listing all associated addresses of the employee. (Must be conducted prior to the criminal background investigation to ensure all counties, states, and federal district courts of residence and employment have been included and verified in the investigation) ○ County records search for all counties on Social Security Header Search ○ Statewide records search for all states on Social Security Header Search ○ Federal Records Search for all Federal Districts in all states on Social Security Header Search • Pre-hire or Initial Drug Screening • 7 Year Employment History Verification which must include the following for each place of employment: <ul style="list-style-type: none"> ○ Name, City and State of the previous employer ○ Dates of employment, as reported by the employee ○ Date of verification (or attempted verification if the previous employer cannot be reached) ○ Indication of if the previous employer was able to verify the dates employment. <p>The criminal record search must be conducted by a third-party. County and state checks must be pulled directly from the county and state repositories. Federal checks must be pulled from the federal district courts or via PACER. The use of a secondary database, often referred to as a SuperSearch, InstaSearch and/or National/Nationwide Search is not allowed.</p> <p>If federal, statewide and/or county searches are not available in a particular state, the applicant must complete the ones available and provide documentation to support the unavailability of the other.</p> <p>If a location has restrictive employee agreements in place that prevents drug screening and/or criminal record searches for certain employees, a letter must be submitted stating who and what employee screening restrictions are in place.</p>	<p>Auditor must inspect applicable documentation for all Non-Citizen Employees and Access Employees who are owners, partners or senior managers (of destruction division) of the Company.</p> <p>The following Access Employees are exempt from the Employment Verification, Drug Screening and I-9:</p> <ol style="list-style-type: none"> 1) officers, directors, owners and/or partners of the Company not engaged in the day-to-day operations; 2) others who have access to or can grant authorize access to the Confidential Customer Media to be destroyed at the applicant's location but are not engaged in the day-to-day destruction operations; and/or 3) independent contractors, subcontractors or employees. <p>Any Access Employees representing the Headquarters of the Company's information destruction division, minimally the President/Vice President of area &/or Audit Coordinator, whether at the location listed on this application or at another location, must have criminal background searches conducted.</p> <p>Auditor will review the results of the Social Security Header Search and criminal background checks of the selected employees. Criminal background checks must include a list and the results of the jurisdictions searched.</p> <p>No person subject to a felony conviction in the last 7 years for any crime involving theft (of tangible or intangible property), fraud, burglary or larceny, and no person currently incarcerated for any crime may be employed in a capacity where they may come in contact with Confidential Customer Media. This applies to all Access Employees.</p> <p>The employment screening is applicable to all Access Employees (other than those exempt from these requirements as mentioned above) regardless of length of service or pre-existing employment status, except where there is a restrictive employment agreement in place. Access Employees whose employment predates the implementation of NAID Certification, must state that they have been employed with the company for the past 7 years.</p>

	Initial	Criteria	Audit Methodology
1.3	<p>Applicant Claims</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>Access Employees are monitored for drugs/substance abuse by one of the following methods (check one):</p> <p><input type="checkbox"/> Option #1: On a random basis, 50% of access employees are drug screened annually.</p> <p style="text-align: center;">OR</p> <p><input type="checkbox"/> Option #2: Management has been trained in a “Substance Abuse Recognition Awareness Program” pre-approved by NAID.</p>	<p>Auditor will verify evidence of the method indicated:</p> <p>Option #1: Invoices/results from drug testing lab for random sampling drug screening of 50% of employees</p> <p style="text-align: center;">OR</p> <p>Option #2: Documentation showing Program approval from NAID and proof that on-site management has completed this Substance Abuse Recognition training within the last year.</p>
1.4	<p>Applicant Claims</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>Ongoing criminal record searches on Access Employees by one of the following methods (check one):</p> <p><input type="checkbox"/> Option #1: One-third of Access Employees have been randomly selected and criminal record searches conducted annually.</p> <p><input type="checkbox"/> Option #2: One-third of all Access Employees are screened the first year, a different 1/3 are screened the following year, and the remaining 1/3 are screened in the third year.</p> <p><input type="checkbox"/> Option #3: All Access Employees have criminal record searches conducted every three years.</p> <p>Year of most recent search: _____</p>	<p>Auditor will review the results of the criminal record search of the employees based upon the method indicated.</p>
1.5	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>Drivers meet all licensing requirements of the governmental jurisdiction.</p>	<p>The applicable law or regulation for commercial driver licenses will be made available and examined by the Auditor. Auditor will request any items required by law for all drivers listed on the Access and Non-Access Employees List.</p>
OPERATIONAL SECURITY			
2.1a	<p>Applicant Claims</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>The Company has a written policies and procedures for drivers and custodial employees.</p>	<p>Auditor to inspect a copy of policies and procedures manuals.</p>

	Initial	Criteria	Audit Methodology
2.1b	Applicant Claims _____	Prior to gaining access to confidential material, all drivers and custodial employees must sign an acknowledgement indicating that they have received, read and understand the Company's current written policies and procedures. A new acknowledgment must be signed by employees on an annual basis.	Auditor to inspect employee files for a signed acknowledgement of the Company's current written policies and procedures. This form must reference the version of the written policies and procedures that it applies to. A new acknowledgment must be signed by employees on an annual basis.
	NAID USE ONLY Verified by _____		
2.1c	Applicant Claims _____	The Company has a written policy in place, stating that the Company will notify any Customer of a potential release of, or unauthorized access to, that Customer's Confidential Customer Media that poses a threat to the security or confidentiality of that information within 60 days of the date of discovery of the data security breach incident.	Auditor will check procedures manual to ensure there is a written policy stating the Company will notify any Customer of a potential release of, or unauthorized access to, that Customer's Confidential Customer Media that poses a threat to the security or confidentiality of that information within 60 days of the date of discovery of the data security breach incident.
	NAID USE ONLY Verified by _____		
2.1d	Applicant Claims _____	The Company has a written policy in place instructing and requiring employees to notify management of a potential release of, or unauthorized access to, Confidential Customer Media that poses a threat to the security or confidentiality of the information.	Auditor will check procedures manual to ensure that there is a written policy instructing and requiring employees to notify management of a potential release of, or unauthorized access to, Confidential Customer Media that poses a threat to the security or confidentiality of the information.
	NAID USE ONLY Verified by _____		
2.1e	Applicant Claims _____	The Company has a written Incident Response Plan for responding to suspected or known security incidents. The Incident Response Plan must include a post-incident business impact analysis and a process for documenting all incidents and their outcomes.	Auditor will review the Company's written Incident Response Plan to ensure there is a policy addressing post-incident business impact analysis and documentation of all incidents and their outcomes.
	NAID USE ONLY Verified by _____		
2.1f	Applicant Claims _____	The Company has a written policy that addresses the procedures for employees to follow during an unannounced audit. This policy must name at least one person or position of contact with physical access to the information the auditor may ask to review, which is to be contacted in the event of an unannounced audit at the custodial location or office. Should circumstances prevent the designated point of contact from being available at the time of the unannounced audit, the Certification Review Board may request additional information to be provided at a later date.	Auditor will review the Company's written policies and procedures for their written policy instructing employees in the procedures to follow during an unannounced audit.
	NAID USE ONLY Verified by _____		

	Initial	Criteria	Audit Methodology
2.1g	Applicant Claims _____	<p>All Access Employees must be trained annually to comply with the NAID Custodial Certification requirements:</p> <p><input type="checkbox"/> Option #1: All Access Employees have taken and passed the NAID Access Employee Training Program (AETP). (Submit AETP Licensing Form with application.)</p> <p><input type="checkbox"/> Option #2: All Access Employees have taken and passed a third-party training course which has been pre-approved by NAID. (Submit AETP approval form and outline of training with application.)</p> <p><input type="checkbox"/> Option #3: All Access Employees have taken and passed an in-house training. If NAID has not already approved the training course for this purpose, an approval form and outline of the program is included with this application. (Submit AETP approval form and outline of training with application.)</p>	<p>Auditor will review evidence of annual training to ensure all Access Employees have passed a training program which complies with the NAID Custodial Certification requirements.</p>
	NAID USE ONLY Verified by _____		
2.2	Applicant Claims _____	<p>Access Employees must display a Company-issued photo I.D. badge at all times while on duty. Badges must minimally include a photo, employee name and Company name.</p>	<p>Auditor will inspect the Company's policies and procedures manual to ensure there is a written policy for Access Employees to display a Company-issued photo I.D. badge at all times while on duty. Auditor will also inspect employees present to verify that they are wearing photo I.D. badges.</p>
	NAID USE ONLY Verified by _____		
2.3	Applicant Claims _____	<p>While at the Customer's location, drivers and other employees of contractor must wear a specific uniform (minimum of Company shirt) to improve recognition by Customers.</p> <p><input type="checkbox"/> Not Applicable</p>	<p>Auditor will inspect the Company's policies and procedures manual to ensure there is a written policy for drivers and other employees of contractor must wear a specific uniform while at the Customer's location. Auditor will also inspect drivers present to verify they are wearing uniforms.</p>
	NAID USE ONLY Verified by _____		
2.4	Applicant Claims _____	<p>All destruction services are performed exclusively by a contracted NAID AAA Certified destruction service provider.</p> <p>A list of all NAID AAA Certified companies used for destruction of Confidential Customer Material is submitted with this application. Any changes to this list must be reported to NAID within 15 business days.</p>	<p>Auditor will inspect the Company's policies and procedures manual to ensure there is a policy stating that all destruction must be provided by a NAID AAA Certified destruction service provider. Auditor will also check that there is a policy stating that any changes to the list of destruction service providers will be reported to NAID within 15 business days.</p> <p>Auditor will also inspect the list of NAID AAA Certified companies used for destruction of Confidential Customer material to verify that all providers of destruction services are NAID AAA Certified.</p>
	NAID USE ONLY Verified by _____		

	Initial	Criteria	Audit Methodology
2.5	Applicant Claims _____	The Company's service paperwork or contract include Customer acknowledgements, receipts or agreements regarding the specific service(s) it is receiving, which specifically references eventual destruction of Confidential Customer Media by a NAID AAA Certified destruction service provider.	Auditor will inspect the Company's policies and procedures manual to ensure that Customer documentation contains the requisite information and will inspect a copy or sample of the Customer documentation.
	NAID USE ONLY Verified by _____	This notification must identify the parties destined to accept custody, the exact location of destruction, and the method of destruction.	
2.6	Applicant Claims _____	All Confidential Customer Material is always attended by a Company employee or physically secured from unauthorized access while in the custody of the Company.	The Auditor will verify that any containers used in the field to transport and/or store Confidential Customer Material have operable locks. Auditor will inspect the Company's policies and procedures manual to ensure that custody of the Confidential Customer Material is addressed. Auditor will determine that there is a secured area designated for holding Confidential Customer Material when unattended until that material is transferred to a NAID AAA Certified destruction service provider, or to another NAID Certified Custodian.
	NAID USE ONLY Verified by _____		
2.7	Applicant Claims _____ <input type="checkbox"/> Not Applicable	All Confidential Customer Material is securely contained during transfer from Customers' custody to transportation vehicle to prevent loss from wind or other atmospheric conditions.	Auditor to inspect collection equipment used by the Company in the field to make sure it protects the Confidential Customer Material from loss due to wind, tipping/spillage or other atmospheric conditions. If in the field, Auditor to check area around vehicle to verify it is free from loose information-bearing material.
	NAID USE ONLY Verified by _____		
2.8	Applicant Claims _____ <input type="checkbox"/> Not Applicable	All vehicles used for transfer of media will have the applicable government inspection for roadworthiness on file.	Auditor will review paperwork from the most recent inspection of all the Company's commercial vehicles within the time frame stated in the applicable state law regarding the nature and frequency of these inspections. If there is a jurisdiction that does not require an inspection of commercial vehicles, Auditor will require a copy of the government regulation statement saying so. Three vehicle records will be checked.
	NAID USE ONLY Verified by _____		

	Initial	Criteria	Audit Methodology
2.9	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>All vehicles used for transfer of media will have lockable cabs and lockable, fully enclosed boxes. These vehicle cabs and boxes must be locked during transport and when unattended by Access Employee.</p>	<p>Auditor will inspect trucks to verify that all cab doors and truck boxes are lockable and that locks work properly. Auditor will inspect the Company's policies and procedures manual to assure that vehicle cab and box locking is addressed.</p> <p>Note: If there are 3 trucks or less all trucks must be made available for inspection. If there are 4 or more trucks 75% of the vehicles must be made available for inspection. If trucks are not made available, the Company must provide written testimony that those trucks not presented for inspection are of equal or superior condition of roadworthiness and security. The testimony must be on Company letterhead and signed by an officer of the Company.</p>
2.10	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>All drivers of vehicles must have readily accessible two-way communication device.</p>	<p>Auditor to verify each driver has an operable two-way communication device with them or in the vehicle.</p>
2.11	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>Unauthorized access to Confidential Customer Media in the designated secure collection area, storage area and/or staging area is effectively prevented.</p>	<p>Auditor to inspect all entrances to verify that unauthorized access to secured area is effectively prevented when media is not attended.</p> <p>Auditor will verify that the Company policies and procedures manual covers access control and unauthorized access interdiction measures.</p>
2.12	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>All visitors entering the secure building must sign a log with their name, time in, affiliation, and time out. Visitors must be issued a Visitor Badge and be escorted or under the supervision of an Access Employee at all times while in the building. The log must be maintained for one year.</p>	<p>Auditor will examine visitor logs and verify the logs are maintained for one year.</p>

	Initial	Criteria	Audit Methodology
2.13	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>There is a secure area within the building devoted only to collecting, staging/storing, and/or processing Confidential Customer Material.</p>	<p>Auditor to inspect building to determine that secured area for Confidential Customer Material processing and/or staging/storing exists.</p> <p>If a secured area within the building is required, it must meet the following specifications:</p> <ul style="list-style-type: none"> • There must be enough space within this area to stage all media to be destroyed. • The wall or fence securing this area must be a minimum of six feet tall and have a lockable gate or door. • If the wall or fence does not go all the way to the ceiling, then it must have a ceiling mounted sensor alarm inside and over the perimeter of the secured collection area, secure staging and processing areas (or similar, suitable device) to detect if and when individuals have climbed over or come through a section of the secured area fence/wall. <p>If the only operations taking place within the building are related to the custodial operations, and if ALL employees with access into the building are screened in accordance with Section 1.2 and are listed as access employees, a separate secure area is not required and the entire building is considered the secure area.</p>
2.14	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>There is a third-party monitored alarm system in place and utilized when the secure destruction building.</p>	<p>Auditor is to inspect alarm system to make sure it is operational and examine alarm test reports &/or invoices from alarm monitoring service.</p>
2.15	<p>Applicant Claims</p> <p>_____</p> <p><input type="checkbox"/> Not Applicable</p> <p>_____</p> <hr/> <p>NAID USE ONLY</p> <p>Verified by</p> <p>_____</p>	<p>There is a closed circuit camera system monitoring all access points into the secure buildings/areas where confidential media is collected, staged/stored, and/or processed. All processing activities are monitored with sufficient clarity to identify people and their activities. There must be enough lighting during non-business hours to ensure that all images have sufficient clarity.</p> <p>NAID must be notified within 48 hours of the discovery of problems with the CCTV system which result in a loss of data.</p> <p>Recordings must be retained for 90 consecutive days in an organized, retrievable manner.</p> <p>Number of days of recordings (as of the date of application): _____</p>	<p>Auditor to inspect the closed circuit monitoring system to ensure that it meets criteria. This includes checking that the system has sufficient cameras and image quality to identify individuals and capture all activities in the secure destruction building from point of entry through final destruction, including any unauthorized access to the confidential information.</p> <p>Auditor will also inspect the policies and procedures manual to ensure there is a written policy for notifying NAID within 48 hours of the discovery of problems with the CCTV system which result in a loss of data.</p> <p>90 days of CCTV playback must be available at the time of the scheduled audit. Auditor to inspect recording library system and to review four 4-minute samples:</p> <ul style="list-style-type: none"> • Two random samples during operational hours • One random sample during non-operational hours • One sample from the 90th day back from the current date <p>Recording of operations may be suspended for playback recordings.</p>

	Initial	Criteria	Audit Methodology
2.16	Branch Claims _____ <input type="checkbox"/> Not Applicable _____ NAID USE ONLY Verified by _____	The following Operational Security systems are checked and maintained on a monthly basis: <ul style="list-style-type: none"> • Alarm System • Lighting • Door Locks • Visitor Logs The CCTV system must be checked on a weekly basis, including a minimum of five minutes of playback to ensure that all cameras and recording systems are working correctly. Monthly and Weekly Logs must be kept for one year.	Auditor will exam the Monthly and Weekly Operational Security Maintenance Logs and verify the are maintained for one year.
COMPANY ASSURANCES			
3.1	Applicant Claims _____ NAID USE ONLY Verified by _____	Company is a legally registered business in the state of residence.	Auditor to examine business license, Certificate of Incorporation or SEC filing.
3.2	Applicant Claims _____ NAID USE ONLY Verified by _____	General liability insurance (aggregate or umbrella) of \$2,000,000 or more.	Auditor to examine valid insurance documents, which could be an ACORD Certificate, a certificate of insurance or a letter from broker verifying coverage limits. Letter must be dated no earlier than one month prior to audit and be for the amount of \$2,000,000 or more.

Please submit application via:
 FAX: (480)658-2088
 EMAIL: certification@naidonline.org
 QUESTIONS: (602)788-6243

NAID[®] CERTIFICATION PROGRAM ADDITIONAL REQUIRED MATERIALS FOR APPLICATION

Company Name: _____ City/Town: _____ Audit #: _____

Access Individuals and Non Access Individuals List

Owners/Partners/Officers of the Company	Title	Involved in Daily Operations Y/N	NAID Auditor use only					
			Conf Agr	Criminal	Drug	Driver Req	File Checked	

**All individuals listed here must have a signed Confidentiality Agreement and Criminal Record Search on file. If the individual is not involved in the daily operations of the business, then they can be exempt from the employment verification and drug screening requirements.*

Employee Name	Date of Hire	Access Y/N	Title/Position	Citizen Y/N	NAID Auditor use only											
					All Employees		Access Employees Only							File Checked		
					Conf Agr	I-9	Drug	Crim State	Crim County	Crim Fed	Empl Ver	2.1b	2.1g		Driver Req	
1.																
2.																
3.																
4.																
5.																
6.																
7.																
8.																
9.																
10.																
11.																
12.																
13.																
14.																
15.																

ADDITIONAL REQUIRED MATERIALS FOR APPLICATION

-continued-

Company Name: _____

City/Town: _____

List of Collection Vehicles **Not Applicable**

Vehicle Identification Number (VIN #)	Vehicle Make & Model	License Plate Number	State/Country of License	Overnight Storage Address (Addr, City, State)	Available for Audit? y/n*	NAID Auditor use only			
						Reg. & Ins.	Road- worthy	Locks	Truck Checked
1.									
2.									
3.									
4.									
5.									
6.									
7.									
8.									
9.									
10.									

*See Section 2.9 for the requirements for fleet availability during NAID Certification Audits

List of NAID AAA Certified Destruction Service Providers – NAID MUST BE NOTIFIED OF ALL CHANGES TO THIS LIST

Company Name	City	State	Type of Destruction Services Provided (Mobile or Plant-based; type of media destroyed)	Contracted Vendor (y/n)
1.				
2.				
3.				
4.				
5.				
6.				
7.				
8.				
9.				
10.				



NAID Access Employee Training Program Order Form and Licensing Agreement

Please Note : The NAID Access Employee Training Program is only available to NAID Members

Company Name: _____ **Individual:** _____

Street Address: _____

City: _____ **State:** _____ **Postal Code:** _____ **Country:** _____

Phone: _____ **Fax:** _____ **Email:** _____

Will the NAID Access Employee Training Program be utilized at multiple locations? No Yes

If yes, please provide the city and state of the other locations that will be utilizing this program (must be the same company):

1. **Company:** _____ **City:** _____ **State/Prov.:** _____ **Country:** _____
2. **Company:** _____ **City:** _____ **State/Prov.:** _____ **Country:** _____
3. **Company:** _____ **City:** _____ **State/Prov.:** _____ **Country:** _____

NAID Access Employee Training Program

\$79.95

This one-time fee grants the NAID Member company (Licensee) rights to use the NAID Access Employee Training Program (Program), including training video, test, test key, and forms to document successful completion of training by Access Employees to fulfil the requirements for access employee training according to Section 2.1g of the NAID Certification Application. Upon processing of payment, a web link to download the training materials will be sent to the email address provided above.

By initialing the following statements it is agreed and understood the following stipulations are a legally binding condition of NAID Access Employee Training Program and Video (Program) use:

_____ The NAID Access Employee Training Program and Video (Program) continues to be the intellectual property of NAID in perpetuity, incorporating all rights and privileges afforded such ownership.

_____ The Member licensing the use of the Program may not reproduce or copy it, in whole or part, in any manner, including written transcripts or excerpts. Licensees are permitted to electronically copy the Program to a computer hard drive with the understanding that the Licensee has the capability and legal responsibility to prevent unauthorized access at all times.

_____ The Member may not post the video, in whole or part, to a publicly accessible website or intranet.

_____ The Member may not allow access to, or allow use by, any other company, entity, agency or individual.

_____ The Member understands the violation of any provisions herein, or a violation of NAID's copyright, and or any effort to circumvent, mitigate, eliminate or prevent NAID's ability to control the distribution of the Video or images from the Video, as determined by NAID, may mean revocation of license, sanctions by NAID including loss of membership or certification, and civil or criminal remedies as NAID may determine appropriate.

_____ Only Members with a copy of this license agreement, which will be stored at NAID Headquarters, may use the Program to fulfil the requirements for Access Employee training according to Section 2.1g of the NAID Certification application.

_____ NAID Certification allows for the use of third party or in-house resources for Access Employee training, subject to NAID approval, and the use of the Program to fulfil the NAID Certification requirement for access employee training according to Section 2.1g of the NAID Certification application is the sole discretion of the Member.

_____ Updated versions of the Program are not necessarily included in this licensing agreement fee and may need to be licensed separately as they become available.

Signed: _____ **Date:** _____

Print Name: _____ **Title:** _____

NAID Use Only			
Member#:	Received:	Shipped:	Completed by:



NAID Access Employee Training Program Payment Form

Company Name: _____ Individual: _____

Street Address (required): _____

City: _____ State: _____ Postal Code: _____

TOTAL REMITTANCE:

USD \$ _____

Payment is by:

Enclosed Check (Payable to "NAID") Check No.: _____

AmEx Discover MasterCard Visa # _____ - _____ - _____ - _____

Expires
(mo/yr): _____ / _____ **CVV code:** _____

Name on Card: _____ Signature: _____

**NAID[®] CERTIFICATION PROGRAM
ACCESS EMPLOYEE TRAINING PROGRAM
APPROVAL SUBMISSION FORM**

Please complete this form and submit to NAID for approval of your Access Employee Training Program (AETP). Upon approval of your program a confirmation email will be sent. Please remember that all access employees must go through the program annually.

Company: _____ Contact Name: _____

Contact Email: _____

Physical Address: _____

City: _____ State/Prov: _____ Postal Code: _____

Total # Access Employees Trained: _____ (all access employees must be trained, per Section 2.1g of the NAID AAA Certification Application)

Is the application for multiple locations? No Yes (If yes, please provide the Company name, city and state of the other location(s) that will be utilizing this program.)

1. Company: _____ City: _____ State/Prov: _____ Country: _____

2. Company: _____ City: _____ State/Prov: _____ Country: _____

3. Company: _____ City: _____ State/Prov: _____ Country: _____

Agency administering the program: _____

Contact person at Agency: _____

Title of Program: _____

Date the program was last conducted (or is to be conducted): _____

I am providing the following program information:

Type of or sample of dated documentation indicating the successful completion of the program:

- Certificate Graded test
 Signed attendance roster Other, explain _____

AND

- Outline of Program & Handouts/materials used during training

Company Signature: _____ Date: _____

Print Name: _____ Title: _____

NAID Use Only

Signed: _____ Date: _____

Print Name: _____ Title: _____

Please submit the form via:
FAX: (480)658-2088
EMAIL: certification@naidonline.org
QUESTIONS: (602)788-6243

**NAID[®] CERTIFICATION PROGRAM
SUBSTANCE ABUSE RECOGNITION TRAINING PROGRAM
APPROVAL SUBMISSION FORM**

Please complete this form and submit to NAID for approval of your Substance Abuse Program Training (SARP). Upon approval of your program a confirmation email will be sent. Please remember that manager(s) and/or supervisors must go through the program annually.

Company: _____ Contact Name: _____

Contact Email: _____

Physical Address: _____

City: _____ State/Prov: _____ Postal Code: _____

Total # Supervisors Trained at above Operation: _____ Total # Destruction Employees at above Operation: _____

Is the application for multiple locations? No Yes (If yes, please provide the Company name, city and state of the other locations that will be utilizing this program.)

1. Company: _____ City: _____ State/Prov: _____ Country: _____

2. Company: _____ City: _____ State/Prov: _____ Country: _____

3. Company: _____ City: _____ State/Prov: _____ Country: _____

Agency administering the program: _____

Contact person at Agency: _____

Agency phone number: _____ Email address : _____

Title of Program: _____

Date the program was last conducted (or is to be conducted): _____

I am providing the following program information:

- Certificate Graded test
 Signed attendance roster Other, explain _____

AND

- Outline of Program & Handouts/materials used during training OR Proof of DOT approved program

Company
Signature: _____ Date: _____

Print Name: _____ Title: _____

NAID Use Only

Signed: _____ Date: _____

Print Name: _____ Title: _____

Please submit the form via:
FAX: (480)658-2088
EMAIL: certification@naidonline.org
QUESTIONS: (602)788-6243

NAID[®] CUSTODIAL MEMBERSHIP/CERTIFICATION PROGRAM

AUDIT PREPARATION CHECKLIST

The following checklist has been prepared to help you expedite a successful Certification audit. You should review this checklist at least one week prior to your scheduled audit to ensure all items are in place.

Items 1.1 through 1.5 – EMPLOYEE REQUIREMENTS

- All employee files must contain completed **Confidentiality Agreements**, an **I-9 form** (or proper work permit/registration paperwork), and a signed acknowledgment of the Company's policies and procedures manual.
 - All **ACCESS** employee files must contain an **Employment History Verification**, a **Criminal Record Search** (at least 7 years of history) and **Drug Screening Results**.*
 - All employee files for **DRIVERS** must contain a copy of a **valid driver license** and/or commercial driver license and any additional items required by governmental jurisdiction for drivers.
 - All drivers and processing employee files must contain an acknowledgment of the company's written policies and procedures. A new acknowledgment must be signed on an annual basis.
 - A file containing documentation supporting **annual random Access employee criminal searches**.
 - For the **annual Access employee drug/substance** monitoring:
 - Option 1 - Drug/Substance Screening on annual random basis, then a file containing documentation supporting the 50% annual random **ACCESS** employee drug testing should be available.
- OR
- Option 2 – Drug/Substance Management Training, then a file containing proof of completed yearly management training should be in available.

**Individuals who are officers, directors, owners and/or partners of the applicant company or other individuals who have access to, can grant or authorize access to the confidential materials at the applicant's location but who are not engaged in the day-to-day operation of the applicant company are exempt from the employment verification and drug screening requirements.*

Items 2.1 through 2.16 – OPERATIONAL SECURITY

- Policies and Procedures manual** for employees and drivers updated and accessible. Employee manual must include:
 - All destruction services are performed exclusively by a contracted NAID AAA Certified destruction service provider.
 - Customer documentation process that includes customer acknowledgement, receipt or agreement regarding the specific service they are receiving, which specifically references eventual destruction of Confidential Customer Material by a NAID AAA Certified destruction service provider
 - Access controls and unauthorized access prohibiting measures
 - Unannounced audit procedure and process – at least one person should be named as a contact in the event of an unannounced audit, with physical access to all information auditor may ask to review
 - Policy for notifying management of a potential release of, or unauthorized access to confidential material
 - Policy for notifying Customers of a potential release of, or unauthorized access to their confidential material
 - Written Incident Response Plan for responding to suspected or known security incidents
- All **ACCESS** employees have been trained to comply with NAID Custodial Membership/Certification requirements; training documentation on file
- All **ACCESS** employees in possession of and utilizing **photo I.D. badges** while on duty.
- Company uniform** worn by required employees.
- Containers used to transport confidential materials have operable locks.
- Collection vehicles protect material from loss due to wind, tipping/spillage or other atmospheric conditions.
- File containing most recent inspections of all commercial vehicles. Inspections must be within the timeframe stated in the applicable state laws.**
- The **required number of vehicles** to be inspected will be available on the day of audit. (Requirements are: Three or less, all vehicles must be available. Four or more vehicles, 75% of vehicles must be available.) ***
- All vehicles used for transfer of client records have lockable cabs and lockable, fully enclosed boxes. Locks must always be used during transport and when left unattended.
- Readily accessible, **operable two-way communication devices** for all drivers of collection vehicles.
- Visitor badges** are available. (All visitors must sign visitor log and must be escorted or under the supervision of an ACCESS individual at all times while in the facility.)
- Visitor logs** available for one year.
- A secured area is available for holding confidential materials when unattended until destroyed.
- If the building is not devoted to only holding confidential materials, then a **secured area** within building must meet these certification requirements:
 - Enough space within the area to process and stage all materials.
 - Wall or fence securing the area must be a minimum of 6ft tall. (If the wall or fence does NOT go all the way to the ceiling then the area MUST have a ceiling mounted sensor alarm inside and over the perimeter of the secured destruction area to detect breach of secured fence/wall.)
 - Wall or fence securing the area must have lockable gate or door.
- Monitored alarm system** in place and utilized when secure building/area is unoccupied.
- Closed circuit camera system monitoring all access points into secure building/area.

AUDIT PREPARATION CHECKLIST

-continued-

- Closed circuit camera system provides sufficient clarity to identify individuals and their activities. There must be enough lighting at night or during other non-business hours to ensure that all images have sufficient clarity.
- CCTV playback** available to auditor for **90 days** from date of audit.
- Operational Security Maintenance Check logs** available for one year.
 - Alarm, Lighting, Door Locks and Visitor Logs are checked on a monthly basis.
 - CCTV system is checked on a weekly basis, which includes a minimum five minutes of playback to ensure that the cameras and recording system is operating correctly.
- An ACCESS individual is available on the day of the audit to operate the CCTV equipment for the auditor.

***If there is a jurisdiction which does not require inspections, the file must contain proof of the government statement supporting this.*

****If all vehicles are not made available to auditor, the company must provide written testimony on company letterhead that those vehicles are of equal or superior condition or roadworthiness and security. The testimony must be signed by an officer of the company. The required number of vehicles though, must be available for the auditor*

Items 3.1 through 3.2 – COMPANY ASSURANCES

- File containing business license(s) and any other supporting documentation on business.
- File containing **valid proof of general liability insurance** (aggregate or umbrella) of **\$2,000,000.00** or more.

Note: The indicates sample forms that are available online at www.naidonline.org on the NAID Certification/Documents page.