

AAPA TWIC IMPLEMENTATION WORKSHOP: DEVELOPING FACILITY SECURITY PLAN ENHANCEMENTS THAT COMPLY WITH TWIC AND KEEP COMMERCE FLOWING



Escorting and Monitoring Policies

- How to meet the volume of escorts?
 - Require TWIC for all visitors
 - Is this enforceable?
 - Manage Escort/Visitors System
 - Escort Pool
 - Visitor Passes: TWIC/non-TWIC'd
 - Color coded
 - Only TWIC holding employees of owner/operator will be allowed to escort

Escorting and Monitoring Policies

- Escort-required training (33CFR Required)
- International Visitors not eligible for TWIC
 - Allow Owner-operator TWIC Holders to escort
 - TWIC'd Taxi driver
 - Allow other approved TWIC holders
(Seaman's Church)

Escorting and Monitoring Policies

- Rail – How to verify if rail crews are TWIC'd?
 - Sub Issues
 - Cannot put pedestals on railroad right of ways
 - Some rail companies forbid employees for getting off the train/others from getting on the train
 - Solutions
 - Remove automation – man the gates with security personnel
 - U.S. Coast Guard needs to address this specifically

Escorting and Monitoring Policies

- Monitoring the “full-escort” process
 - Documenting when the process is over
 - Solution: Process through existing visitor pass system – check in/check out
 - Solution: CCTV Monitoring
 - Escorting for foreign nationals beyond truck drivers/seafarers who are ineligible for TWICs

Personnel Issues and Access Provisions

- Casual workers:
 - Could be more than 50% of workforce, not possible to escort.
 - Burden put on “temp agencies” to maintain list of “twic’ed” workers to meet need
 - Fence off areas for casuals to work
 - Adjust work plans that could allow for grouping of workers to allow for escorting

Personnel Issues and Access Provisions

- TWIC Payment
 - Lockheed needs to flexible with payment options
 - Use mobile units to minimize impacts to cost and lost time
 - Mobile units work for initial influx, how will they be maintained
 - Area specific bilingual “trusted agents”

Personnel Issues and Access Provisions

- New hire provisions
 - Use provided steps to obtain “accompanied” status for new hires (go through Homeport)
 - Name based check on Homeport is yet to return any information or questions to users.
 - Job descriptions need to include the necessity for obtaining and maintaining a TWIC.
 - Temporary “TWIC” for new hires?
 - Employee training for topics like escorting

Personnel Issues and Access Provisions

- Lost / Stolen TWIC's
 - Need consistency throughout the COTP community.
 - The receipt for a reissue of a lost TWIC is valid for 7 days?
 - Who is responsible for the confiscation of invalid or revoked TWICs.
 - What does the employer need to report to TSA about terminated employees.

Personnel Issues and Access Provisions

- Visitors
 - TWIC'ed visitors vice non-TWIC visitors
 - Include rules and responsibilities on “welcome card”

Personnel Issues and Access Provisions

- LEO's and First-responders
 - Regulation states they do not need a TWIC if they are responding to an actual emergency.
 - Change wording to read “in the course of official business”
 - Port-police officers required to have TWICS

Personnel Issues and Access Provisions

- **Mariners and Seafarers**
 - Shipping agent/operator responsible for the escort
 - Recommend that facilities require that employees display their TWICs or local ID tied to TWIC (when no safety issue)

Personnel Issues and Access Provisions

- TWIC denials
 - Who at employer does TSA notify?
 - How is notification made and how timely?
 - Can TSA provide employers with the names of those who have listed them as employers?
 - Employers would like proactive notification each time an employee receives or is denied a TWIC.
 - If an employee is denied a TWIC, can he be escorted?

Restricted vs. Secure Areas

- What ever is written into the local FSP is then the law
 - Look at need and use of spaces
 - Allow flexibility when defining areas
 - Allow for intermittent security zones, “if the ship is not in the dock can I lower the facility to that.
 - Restricted 30 mins prior

Restricted vs. Secure Areas

- Roads through the restricted areas
 - Use technology such as cameras
 - Use “mass transport” via busses and vans

Site Specific Cards & Access Control Systems

- Site-specific vs. One credential (TWIC)
 - Multiple cards for multiple purposes – some access control related/some not
 - Pros /Cons
- Organization issued cards vs. TWIC – union/authority – some more robust than TWIC because serve operational purposes
 - Qualified to run equipment
 - Access to areas

Site Specific Cards & Access Control Systems

- How to interface TWIC into your access control system? What data from TWIC? To what extent can you use data beyond the chuid in your local system?
Technology
- Displaying TWIC (wearing) to enhance security – Caveat – could be a safety issue for certain in labor

Site Specific Cards & Access Control Systems

- Can data be written to the TWIC card?
 - Local access information –
 - Need clarification – bar code can be written to but if number can be overwritten not a useable solution
- Do all port employees have to have a TWIC card? Admin staff, non-regulated facilities staff, etc...
 - May be extenuating circumstances (911) staff has to relocate to MTSA regulated facility

Site Specific Cards & Access Control Systems

- Biometric requirement – Will it be required always, at certain MARSEC levels,
 - If not required all the time what is the point of the card
 - Doesn't build a day to day culture of security
- Security gap – no hotlist during flash pass phase
- When hotlist enabled how will it be communicated to ports - electronically

Reader Technology, Funding and Admin

- Reader Pilot Testing
 - Sunlight
 - Card collision (w/message to user)
 - Self-healing (reset) speed
 - Repeat of just failed step in process
 - Test durability of card

Reader Technology, Funding and Admin

- Software testing and development
 - Internal to TWIC (connecting to TSA etc...)
 - External to TWIC (TOS, access control systems)

Reader Technology, Funding and Admin

- Funding Opportunities
 - PSGP to cover 5 year warranty for purchase
 - PSGP to cover refresh program or spare stock

Reader Technology, Funding and Admin

- Phase 1 vs. Phase 2
 - Will “hotlist” be available for optional use in phase 1?
 - What is available to read off the chip
 - Can operators write to track 2 & 3 on card and protect it from being over written?

Reader Technology, Funding and Admin

- Payment
 - TWIC website does not mention to bring the \$132.50 to the enrollment center.

Reader Technology, Funding and Admin

- **Enrollment Centers**

- Corporate checks or credit cards need to be accepted
- Minimum threshold for using a mobile enrollment center is 50, should be same for accepting corporate checks
- What is the criteria for keeping one open or even creating another one?

Reader Technology, Funding and Admin

- **Contact vs. Contactless**
 - There are pros and cons both ways
 - Choice depends on desired access control requirement for the gate

Reader Technology, Funding and Admin

- Failure to capture biometric
 - Does TSA have guidance for this?
 - How does facility know when this is the issue?
 - Suggest a separate type of PIN be used in lieu of biometric verification (as at airports)
- ADA issues
 - Does TSA have hand held biometric scanners for enrollment processes?

Reader Technology, Funding and Admin

- Card Readers

- “positive access control”: Scanning out of a terminal wont work, especially in a ro/ro type
- Technology based maintenance comparison
- Technology based functionality comparison
- Will operators be required to validate other FIPS 201 comppliant cards in the future?
- Specify physical dimension maximums

Access Controls and Gate Management

- Personnel requirements during flash pass phase
 - Hire a guard
 - Implement a biometric in phase 1 (unmanned gate)
 - Link TWIC to legacy system through CHUID and do random checks

Access Controls and Gate Management

- Fraudulent card management
 - When fraudulent use is suspected, recommend that CG delegate authority to port police and/or local law enforcement to enforce TWIC, particularly ability to confiscate TWIC.
 - This could be in the form of a verbal authority on a case-by-case basis if needed.

Access Controls and Gate Management

- Gate Reconfiguration
 - Phase 1 – biometric technology compatible with legacy systems
- Reconfigure Restricted Areas
 - Limit the restricted area through physical means
 - Intermittent restricted areas – vessel present=restricted when not secure – key is the control mechanism-fencing not always the answer

Access Controls and Gate Management

- Non-Twic'd Truckers/POVs/Pedestrians –
 - Problem resolution area / Visitor Center
- Trucker turned away – Cargo trucks will not be escorted – no queuing area – will escort vessel stores and visitors
- POV – vehicle vetting decal
- Escorting personnel
 - Visitors –assumption is tenant will have responsibility
 - Training and responsibility through MOUs

Access Controls and Gate Management

- Unresolved Issues

- Casual Labor
- Coast Guard Inconsistency
- Process for Authenticating a TWIC (Features of a valid)
- Responsibility when a invalid TWIC is presented
- If no existing Access control – how local verification performed
- OTR Drivers – how long will TSA hold TWICs for non-local drivers
- Changing address, status, etc... how is this handled
- Verifying longshore purpose on a terminal
 - Some send lists in advance
- Verifying TWIC at unmanned gates
- Will terminal infrastructure need to change to accommodate TWIC