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

• 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

• 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”

• 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

• 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.

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

• 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

- 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)

- 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
• 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 won’t work, especially in a ro/ro type
  – Technology based maintenance comparison
  – Technology based functionality comparison
  – Will operators be required to validate other FIPS 201 compliant 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