



# PARAS

PROGRAM FOR APPLIED  
RESEARCH IN AIRPORT SECURITY



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## Synthesis of Escort Privileges and Escorting Practices

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Sponsored by the Federal Aviation Administration

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Through the ASSIST (Airport Security Systems Integrated Support Testing) Program, Safe Skies conducts independent, impartial evaluations of security equipment, systems, and processes at airports throughout the nation. Individual airports use the results to make informed decisions when deploying security technologies and procedures.

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Through PARAS (Program for Appplied Research in Airport Security), Safe Skies provides a forum for addressing security problems identified by the aviation industry.

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The Program for Applied Research in Airport Security (PARAS) is an industry-driven program that develops near-term practical solutions to security problems faced by airport operators. PARAS is managed by Safe Skies, funded by the Federal Aviation Administration, and modeled after the Airport Cooperative Research Program of the Transportation Research Board.

Problem Statements, which are descriptions of security problems or questions for which airports need guidance, form the basis of PARAS projects. Submitted Problem Statements are reviewed once yearly by the Safe Skies Oversight Committee, but can be submitted at any time.

A project panel is formed for each funded problem statement. Project panel members are selected by Safe Skies, and generally consist of airport professionals, industry consultants, technology providers, and members of academia—all with knowledge and experience specific to the project topic. The project panel develops a request of proposals based on the Problem Statement, selects a contractor, provides technical guidance and counsel throughout the project, and reviews project deliverables.

The results of PARAS projects are available to the industry at no charge. All deliverables are electronic, and most can be accessed directly at [www.sskies.org/paras](http://www.sskies.org/paras).

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## SUMMARY

Under 49 CFR § 1542.209, airports are required to conduct fingerprint-based Criminal History Records Checks (CHRC) on applicants seeking unescorted access to the SIDA. 49 CFR § 1542.211 gives airports the option to allow the escorting of individuals while they are in a TSA-restricted area.

Airports face numerous complicated tasks surrounding the practice of escorting, including vetting escorted individuals, documenting and monitoring escorted individuals, preventing companies and individuals from using the escort system to bypass the credentialing process, and enforcing escorting policies and procedures. This document provides a synthesis of current practices to assist airports with decisions surrounding escort privileges and escorted-access options. Topics covered include:

- General escort program rules
- Limits on escorted access
- Vetting considerations and available options
- Monitoring/record keeping of escorted individuals
- Training for escort privileges
- Escort privilege indicators on ID media
- Accountability requirements for badge holders and authorized signatories/companies
- Potential penalty structures and strategies
- Relationship of policies and plans to the Airport Security Program
- Available supporting technologies

Airports of any type and size can apply the information in this guidance.

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## PARAS ACRONYMS

<b>ACRP</b>	Airport Cooperative Research Program
<b>AIP</b>	Airport Improvement Program
<b>AOA</b>	Air Operations Area
<b>ARFF</b>	Aircraft Rescue & Firefighting
<b>CCTV</b>	Closed Circuit Television
<b>CEO</b>	Chief Executive Officer
<b>CFR</b>	Code of Federal Regulations
<b>COO</b>	Chief Operating Officer
<b>DHS</b>	Department of Homeland Security
<b>DOT</b>	Department of Transportation
<b>FAA</b>	Federal Aviation Administration
<b>FBI</b>	Federal Bureau of Investigation
<b>FEMA</b>	Federal Emergency Management Agency
<b>FSD</b>	Federal Security Director
<b>GPS</b>	Global Positioning System
<b>IED</b>	Improvised Explosive Device
<b>IP</b>	Internet Protocol
<b>IT</b>	Information Technology
<b>MOU</b>	Memorandum of Understanding
<b>RFP</b>	Request for Proposals
<b>ROI</b>	Return on Investment
<b>SIDA</b>	Security Identification Display Area
<b>SOP</b>	Standard Operating Procedure
<b>SSI</b>	Sensitive Security Information
<b>TSA</b>	Transportation Security Administration

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## **ABBREVIATIONS, ACRONYMS, INITIALISMS, AND SYMBOLS**

<b>AAAE</b>	American Association of Airport Executives
<b>ACI</b>	Airports Council International
<b>AEP</b>	Airport Emergency Plan
<b>ASC</b>	Airport Security Coordinator
<b>ASP</b>	Airport Security Program
<b>CBP</b>	Customs and Border Protection
<b>CBT</b>	Computer Based Training
<b>CHRC</b>	Criminal History Records Check
<b>CISA</b>	Cybersecurity and Infrastructure Agency
<b>GAO</b>	Government Accountability Office
<b>IDMS</b>	Identity Management System
<b>NOV</b>	Notice of Violation
<b>PBR</b>	Portable Badge Reader
<b>PSA</b>	Protective Security Advisor
<b>STA</b>	Security Threat Assessment

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## RELEVANT TERMINOLOGY

<b>Challenge</b>	A demand to produce and display airport security identification media in accordance with TSA regulations.
<b>Escort</b>	An individual at an airport with designated privileges to accompany non-badged individuals to restricted areas.
<b>Escort Ratio</b>	The number of individuals a badge holder may escort at one time.
<b>ID Media</b>	Airport-issued badges and identification cards.
<b>Pass</b>	A temporary physical pass issued by the airport to individuals under escort, requiring display. This also includes associated terms such as temporary pass, temporary badge, temporary visitor pass, or visitor badge.
<b>TSA-Restricted Areas</b>	TSA-regulated areas as defined by 49 CFR 1540.5, including AOA, Secured Area, SIDA, and Sterile Area.

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## SECTION 1: INTRODUCTION

### 1.1 Overview

Airport operators across the country face competing priorities when managing access to TSA-restricted areas (i.e., AOA, Sterile Area, SIDA, and Secured Area). While security remains the most important consideration, the efficient flow of people, supplies, and equipment is also essential to daily operations.

In February 2020, the United States Government Accountability Office (GAO) presented a Report to Congressional Requesters, *Aviation Security – TSA Could Strengthen Its Insider Threat Program by Developing a Strategic Plan and Performance Goals*. The report lists several TSA security directives and informational circulars on airport insider threats, and the measures taken by airport operators and the TSA to significantly reduce and eliminate insider threats to aviation security.

As airports are instructed to attend to insider threat concerns, restricting and controlling who is granted access to TSA restricted areas becomes critically important. 49 CFR § 1542.209 requires airports to conduct fingerprint-based Criminal History Records Checks (CHRC) on applicants seeking unescorted access to the SIDA. In the absence of ID media that would allow unescorted access, 49 CFR § 1542.211 gives airports the option to allow the escorting of individuals while they are in a restricted area.

This synthesis seeks to assist airports with decisions about escort privileges and escorted-access options by discussing the issues, considerations, and current practices in place. This project's research found that various approaches can lead to effective escorting policies and procedures. A holistic approach to escorting that is communicated as a crucial component of a strong security culture leads to the best outcomes.

### 1.2 Complications Affecting Escorting

Airports of all sizes grapple with challenges surrounding escorting individuals in restricted areas. These include vetting escorted individuals, documenting and monitoring escorted individuals, preventing companies and individuals from using the escort system to bypass the credentialing process, and enforcing escorting policies and procedures.

The research found some challenging conditions and situations that are common across airports, including:

- Meeting the employment needs of temporary projects, including extensive remodeling and other construction projects.
- Addressing badge holders and/or authorized signatories neglecting their responsibilities.
- Setting and enforcing limits on escorted access without supportive technology.
- Maintaining an accurate record of escorted individuals.

### 1.3 Research Approach

The project team began its research by identifying a set of questions to address key components of an escorting program, including:

- Are employees/contractors allowed to be escorted while background checks are in process (i.e., during the vetting process) for a permanent badge?
- Are there limits to how frequently an individual can be escorted?

- Does the airport conduct background checks for escorted individuals?
- How are rules regarding escorting procedures communicated to employees, companies, or authorized signatories?
- Is there any documentation specific to escorting procedures, such as a badge holder responsibility sheet or an escort policy acknowledgment form, that is completed and signed by badge holders with escorting privileges?
- What is the relationship of escorting policies and plans to the Airport Security Program (ASP)?
- Has the airport developed or implemented any strategies, such as an audit, to address escorting accountability for authorized signatories?
- What software or technology systems are in place to support escorting practices?

The project team conducted a literature review of documents on practices, guidance, and strategies regarding escorting policies and procedures. The review revealed that while there is an extensive body of literature detailing guidance and requirements for unescorted access to restricted areas, specific guidance and best practices related to escort privileges and escorting practices is somewhat limited.

The project team then began the airport interview process. The cohort included 25 airports of various sizes, as detailed in Table 1-1. These included ten large hub, six medium hub, six small hub, and three nonhub airports.

**Table 1-1. Number of Airports Interviewed by Category**

Airport Hub Type	Number of Airports
Large Hub	10
Medium Hub	6
Small Hub	6
Nonhub	3

Most stakeholders who participated in the interviews were airport operators, security coordinators, access control managers, and/or compliance managers. Many provided supporting documentation, including escort procedures, rules and regulations, badge application forms, visitor logs, and information on penalty fees.

The project team also interviewed representatives from several non-aviation entities with highly secure facilities. A Protective Security Advisor for the Southern California division of the Cybersecurity and Infrastructure Security Agency (CISA) provided insights on best practices surrounding escorted visits to secure facilities.

## 1.4 Document Layout

The document is organized into the following sections:

**Section 2** reviews the regulatory history regarding escorted access and traces how the regulations have evolved.

**Section 3** discusses the general program rules common among airports, as well as the obstacles faced.

**Section 4** looks at escort indicators, both for the badge holder with privileges and the individual under escort.

**Section 5** discusses the escort training provided to badge holders and the training options available.

**Section 6** discusses the monitoring and record keeping of individuals under escort.

**Section 7** addresses limits on the number of escorted visits allowed and the duration of escorted visits.

**Section 8** reviews the options for vetting escorted individuals and the practical considerations associated with doing so.

**Section 9** focuses on the technology options available to assist with vetting and monitoring, as well as the cost considerations.

**Section 10** looks at the importance of stakeholder communication, and of making escorting rules and regulations publicly available.

**Section 11** examines the relationship between escorting policies and the ASP.

**Section 12** reviews enforcement strategies, including penalty options and incentive programs.

**Section 13** provides insights and best practices learned from non-aviation entities.

**Section 14** provides five case examples of airports with successful, holistic approaches to escorting.

## SECTION 2: REGULATORY HISTORY

### 2.1 Overview

In May 1972, the FAA issued Advisory Circular AC No. 107-1, *Airport Security – Airports* that, in an effort to improve airport security procedures, included recommendations to establish and maintain an authorized persons identification system and associated processes. Over the next 30 years, the system progressed to develop identification media; use CHRC on individuals; and improve technology implementing access control systems, video surveillance systems, and other supporting technology.

The terrorist events of September 11, 2001 led to the Homeland Security Act of 2002 that created DHS and TSA. A new set of aviation regulations replaced the security oversight of FAA Part 107 regulations with 49 CFR § 1542 – Airport Security.

### 2.2 TSA Regulations and Guidance – 49 CFR § 1542

49 CFR § 1542.209 requires that airports conduct fingerprint-based CHRCs for individuals seeking unescorted access to restricted airport areas, including the SIDA. In some instances, in accordance with 49 CFR § 1542.211, individuals who have not undergone the requisite background check are permitted access to restricted airport areas if they are properly escorted. Airports are required to implement escorting procedures in their ASP for those individuals. Federal regulations 49 CFR § 1542.211 – Identification Systems (e) Escorting, and 49 CFR § 1542.213 – Training specifically address the airport operator’s responsibility for escorting and training procedures.

### 2.3 Airport Security Program

No airport subject to 49 CFR § 1542 may operate in the absence of a TSA-approved ASP. An ASP describes how airports will protect airlines, aircraft, and the safety and security of persons and property against terrorist acts, unauthorized items, and criminal activity. 49 CFR §§ 1542.211 and 1542.213 provide the regulatory basis for the requirement for airports to define escorting procedures in their approved ASP.

On November 9, 2006, the TSA issued a security directive requiring airport operators to develop and implement specific processes regarding escorting procedures. The security directive was updated in May 2012 to require the following as part of the ASP:

- Description of training of persons with the authority to escort others.
- Description of airport operator’s procedures to approve escorting requests
- Activities for which the airport will approve escorting
- Requirement to indicate escort authority on airport ID media.

### 2.4 GAO Insider Threat Report and Future Planning

The GAO presented a Report to Congressional Requesters in February 2020 titled *Aviation Security – TSA Could Strengthen Its Insider Threat Program by Developing a Strategic Plan and Performance Goals*. The report lists several TSA security directives and informational circulars on airport insider threats, and the measures airports and the TSA shared to significantly reduce and eliminate insider threats to aviation security. Strategies included individual background checks, ID media, access control technology, and challenge procedures at access points. As strategies to counter insider threats continue to develop, it is expected that escorting, screening, and monitoring procedures will be enhanced.

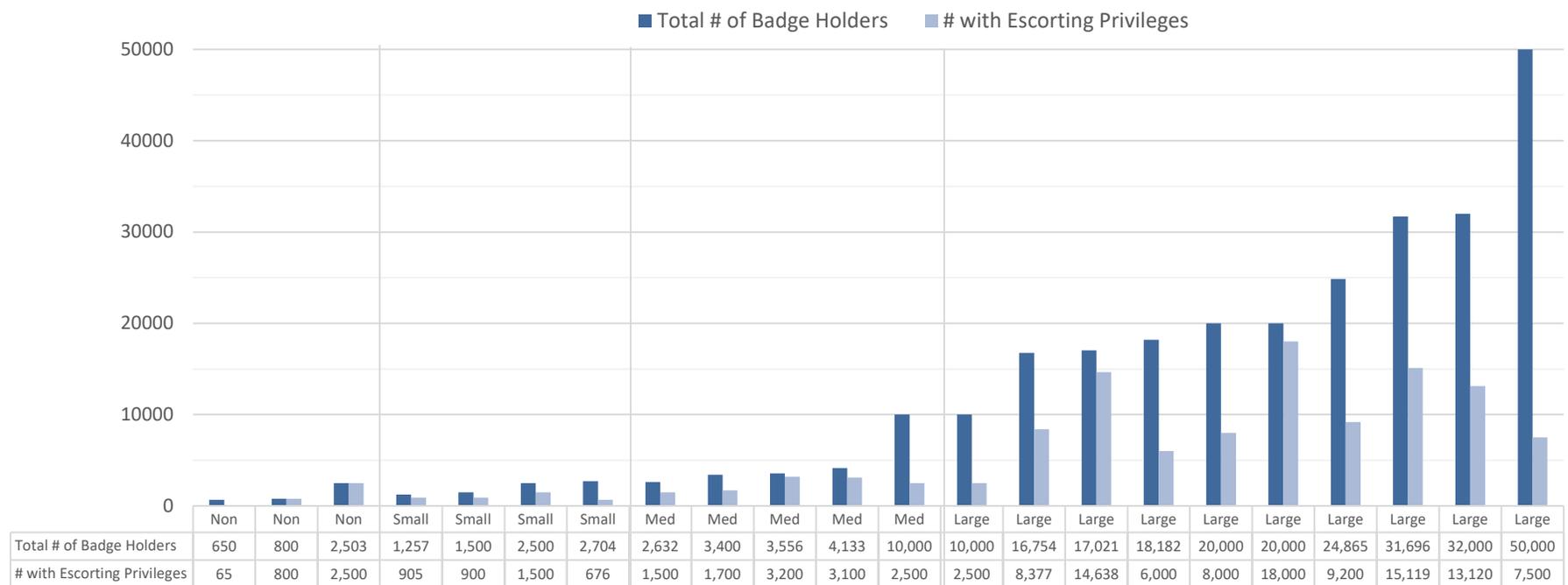
## SECTION 3: ESCORTING PROGRAM

### 3.1 General Program Overview

Airports conduct escorting operations when someone who does not have an airport badge needs access to restricted airport areas. Individuals may only be escorted in order to fulfill a legitimate business need. The most common reasons individuals are escorted are for construction, maintenance, and vending. Only a person who has been granted unescorted access, has escorting privileges, and displays the proper ID media is allowed to conduct an escort.

Most airports do not track the number of escorted individuals who pass through their airport. Based on the estimates provided to the research team, at large hubs the number of escorted individuals on an annual basis is in the tens of thousands, while smaller airports estimate between one and two thousand. The number and percentage of badge holders with escorting privileges at airports of all sizes varies widely, as shown in Figure 3-1.

**Figure 3-1. Number of Badge Holders with Escorting Privileges at Large Hub, Medium Hub, Small Hub, and Nonhub Airports<sup>1</sup>**



<sup>1</sup> One medium hub airport and two small hub airports did not report this data and were excluded from the chart.

While all airports mandate that only approved badge holders may conduct escorts, fewer mandates apply to the individuals under escort. As will be discussed in greater detail in the following sections, background checks, airport-issued visitor passes, and check-in and check-out procedures all vary by airport.

### 3.2 General Escort Program Rules

Badge holders are required to maintain positive control of escorted individuals. A majority of the airports interviewed limit the number of escorted individuals to those whom the badge holder can keep within “sight and sound.” The majority of airports interviewed have a specific escort ratio defined and communicated during training; the average and median ratio was 1:5. Some airports specify a physical distance between badge holder and escorted individual that an escort cannot exceed (i.e., 30 feet), though airports report difficulties with this approach as situations vary across sterile, SIDA, and AOA environments. One airport that imposes specific distance requirements varies the distance by area to account for these different environments.

#### Example Escorting Language

Only a properly SIDA-badged person can escort a person with a temporary visitor pass. The person being escorted (Visitor) must continuously accompany and be monitored by the escort while they are in the restricted area. The escort must always be in a position to communicate with the escorted person both visually and verbally. For example, they cannot be on the opposite side of a door or aircraft.

### 3.3 Escorting During the Credentialing/Vetting Process

Most airports interviewed allow escorting during the credentialing process, but there are some exceptions. For example, one medium hub airport does not allow escorting in the Sterile Area during credentialing due to past abuse of the privilege. Another medium hub airport does not allow it for construction in a movement area, due to the training required.

When it is allowed, the individuals being escorted are subject to the same rules as those who are not undergoing the credentialing process. For example, if an airport has a limit in place that a person can only be escorted five times in a year, then that limit still applies to the individual undergoing credentialing.

### 3.4 Common Obstacles

The airports interviewed reported a variety of obstacles associated with their escorting programs and procedures. Many airports reported that setting or enforcing limits is difficult without supportive technology (i.e., searchable databases and records of escorted individuals). Other commonly referenced obstacles include limited staff and resources to support escorting programs, and decentralized programs where airports rely on authorized signatories to enforce escorting policies.

## SECTION 4: ESCORT INDICATORS

### 4.1 Overview

49 CFR § 1542.211 requires airports to develop a personnel identification system. In general, the regulations provide that airport ID media must display a full-face image, name, and identification information; an individual's access and movement privileges; an expiration date; and be of sufficient size and appearance so as to be readily observable for challenge procedures. This section of the code also discusses use of temporary ID media, airport-approved ID media, challenge program, and escorting.

The airports interviewed have developed ways to clearly identify escort privilege authorization on their ID media. Many of the airports also have procedures to issue temporary passes to those being escorted or for special purposes, including activities related to airport construction or for emergency management purposes.

### 4.2 Badge Holder Privilege Indicator

Airports indicate a badge holder who has escort privileges using a variety of signifiers on approved ID media. These may include a specific badge color, icon, or word. The majority of airports interviewed use the letter "E" or spell out "ESCORT" on the badge in a clearly visible fashion. One airport uses icons representing two people, similar to the universal symbols on restrooms, to depict escort privilege.

Some small and medium hub airports where nearly all badge holders possess escorting privileges use distinct markings on their badges for those who do *not* have escorting privileges. In these cases, a countermark or icon may be used, such as a red "E" that is circled and crossed through.

One large hub airport issues badges in four distinct colors to indicate (1) access to the public area of the terminal, (2) access to the Sterile Area of concourses, (3) access to SIDA without escorting privileges, and (4) access to SIDA with escorting privileges.

### 4.3 Pass for Escorted Individual

Of the airports interviewed, 40% issue a temporary physical pass to individuals under escort. The use of such passes was more prevalent at airports reporting a high volume of escorted individuals (i.e., larger medium hub and large hub airports).

Temporary passes sometimes resemble regular airport badges with airport logo, holograms, and dates. Only two large hub airports interviewed include the name of the escorted individual. The front of the escort passes frequently includes either the word "ESCORT" or the phrase "This individual must remain under escort." As most escort passes are designed to be used for a limited period of time, some include an expiration date or the phrase "LIMITED TERM." Some also include sequential numbering for accountability. On the back of the pass, several airports print a summary of the rules of the escort program or instructions on how to return if lost.

Most temporary physical passes are made of hard plastic material, similar to standard badges but without any access control features; exceptions include paper passes inserted into a plastic clip-on case and laminated paper passes. It is common to use a distinct color to differentiate a visitor pass from a standard airport badge. These colors may be changed after a defined period of time or for accountability reasons. One small hub airport reported using two colors on their temporary passes, and also configuring the pass to hang horizontally to further contrast the pass from airport ID media.

Two large hub airports have a nominal fee associated with the issuance of temporary passes to cover the cost of the pass and materials.

#### 4.4 Special Purpose Passes

A number of airports have developed systems for issuing temporary escort passes for special purposes, such as construction activities or emergency situations. While an airport has the flexibility to work with the TSA to develop special purpose procedures, some airports interviewed choose to administer temporary pass use on a consistent basis for all purposes, as provided for in their security program.

One example of the need for a special purpose pass is an airport undergoing a major construction project. Orange badges with escort privilege symbols are issued to vetted and trained construction supervisors. These supervisors are provided with up to five sequentially numbered yellow passes that they can issue to construction workers such as day laborers. The orange badge holder is then responsible for those yellow pass workers' adherence to escort rules and regulations at all times. Escorted activities are not monitored by the airport except at vehicle checkpoints, such as the entrance for the construction workers.

One airport shared the details of their specialized passes for emergency situations. In the event of a major accident or incident, the airport has an emergency pass program for first responders to ensure only authorized individuals are allowed access to the scene. This system enables the airport to track those persons who have entered and exited the area, and also keeps the media and family members away so that the scene is not disturbed. Once provided with an emergency visitor pass, an individual does not require escort. Each pass is color coded and corresponds to the activation period (i.e., the first day is one color, second day is another color). Each day, the total number of passes is reduced on the assumption that fewer people will need access to the area as the days progress. This airport has included escorting policies and procedures in its Airport Emergency Plan.

## SECTION 5: TRAINING

### Key Considerations

- Most airports communicate the rules regarding escorting procedures to employees, companies, and authorized signatories during initial and recurrent (badge renewal) training.
- Most airports report training all badge holders on the basics of escorting so that even those without privileges can recognize and challenge activity inconsistent with airport rules. Several airports hold dedicated escort training sessions with those who have escorting privileges to review the rules and responsibilities.
- Many airports use computer-based or online training. Some customize prepackaged content, while others create their own content.
- Re-training is often the corrective action for those found in violation of escorting policies and procedures.

### 5.1 Overview

49 CFR § 1542.213 requires every airport operator to ensure that each individual performing security-related functions at the airport is provided training so they may understand their responsibilities to perform their duties. Individuals may not perform those duties until they have successfully completed training in accordance with the airport's TSA approved curriculum. The curriculum must include access authority in airport areas, proper control and use of ID media, escort and challenge procedures, law enforcement support, and overall security responsibilities and support of the airport's security program.

Airports are required to provide security training to each person obtaining ID media for access to restricted airport areas. During this instruction, all airports explain the definition of an escort, and review who has the ability to escort others. Instruction is provided at the initial training session to ensure everyone will recognize an escort and understand their responsibilities.

### 5.2 How Training Is Conducted

Each airport customizes the security training to include the specifics of their airport and typically assigns airport law enforcement, airport security, or airport operations staff to conduct the training.

Training can be provided using an in-person classroom setting, an in-house computer-based training (CBT) program, or online options that do not require the applicant to report to a specific location to receive the training. Most airports interviewed provide CBT, which is commonly conducted at the credentialing office. One large hub airport provides training stations at the airport fire station and the maintenance building. Some airports provide the applicant with login information and allow for the training to be taken at off-site locations.

CBT and online programs are often viewed as more efficient and less resource intensive for the airport. However, because of the benefit of personal interaction with participants, some airports continue to use the classroom approach. One small hub airport provides a PowerPoint presentation and then conducts a conversation with individual contractors to ensure escorting requirements are understood.

### 5.3 Training Curriculum

During instruction, all airports define the role of escort and identify who has the ability to provide escort to others. As part of the airport security training, individuals are instructed how to recognize an authorized person in the restricted area and how to recognize a proper escort. In the event a person appears to be unauthorized and/or not properly escorted, the badge holder has the responsibility to challenge the individual, requesting to see the proper ID media. If the individual cannot produce the proper credentials, the badge holder escorts them out of the area and/or summons law enforcement.

One small hub airport created the “Security Awareness For Everyone” (SAFE) program, which combines security education in the form of interactive training that everyone receives at the time of badging and a program that promotes challenge procedures.

Training programs often review the specifics of the airport’s escort programs, including the proper ratio of badge holder to escorted individuals and the requirements of maintaining positive control. One airport uses specific case study examples that help illustrate proper escorting procedures. Instruction may also review specific circumstances, such as the fact that an employee who forgets their badge at home is not allowed to work under escort.

Some airports require any badge holder with escorting privileges to take an additional class specific to escorting procedures and responsibilities. Several airports also provide in-person training for authorized signatories to review escort procedures.

Upon completion of the training, individuals at most airports are required to attest electronically in the computer-based training program or to sign a form acknowledging the training and their responsibilities under the airport security program. Several airports have a test at the end of their training video, which the applicant must score 100% on to receive their badge.

### 5.4 Frequency of Training

Many airports indicate they require recurrent training, either annually or every two years, to coincide with the expiration of the badge. Proactive airports communicate throughout the year to employees, companies, and authorized signatories regarding security issues and escorting procedures. Re-training is often the corrective action for those found in violation of escorting policies and procedures.

### 5.5 Training Materials

One airport developed a helpful pocket guide for applicants to use in preparation for the SIDA training and testing. Now available online, the guide reviews key vocabulary and terms, as well as specific escorting rules. Several airports reinforce escorting rules on badge applications, or use specific escort forms, such as the example SIDA Escort Authorization Form in Figure 5-1, that require signature to ensure all applicants are clear on their obligations.

Figure 5-1. Example SIDA Escort Authorization Form



# SIDA ESCORT AUTHORIZATION FORM

In order for you to receive the ESCORT designation on your SIDA badge, you must first be authorized by your manager. Once authorized, you are required to read this document in it's entirely and sign at the bottom. By your signature below, accompanied by the Certifying Official's signature, you declare to fully understanding these requirements.

The [REDACTED] ID Badge will be modified with an "E" on the face of the badge next to the photo of the badge-holder. The "E" indicates the person is authorized to conduct escorts for official purposes. The escort authority does not allow for personal use, such as escorting family or friends. Only those persons with the "E" on the badge will be authorized to escort persons into the Secured Area and/or Sterile Area. Non-compliance of the escorting procedures, protocol, and standards will result in the issuance of a security citation as outlined in the Airport Security Program. The following are specific requirements for escorting non-[REDACTED] ID Badged individuals into the Secured Area SIDA and the Sterile Area:

1. All individuals who are employed to work in the Secured Area SIDA, AOA SIDA, or Sterile Area of [REDACTED] are required to pass the FBI Criminal History Records Check (CHRC) and a Security Threat Assessment. Those individuals failing the CHRC and/or Threat Assessment are not authorized within the Secured Area SIDA, AOA SIDA, or Sterile Area under escort.
2. All currently employed individuals whose [REDACTED] ID Badges are active are not authorized to be escorted into the SECURED SIDA or the Sterile Area.
3. No more than five (5) non-[REDACTED] ID Badged individuals may be escorted at one time by an authorized [REDACTED] ID Badged individual.
4. All escorted non-[REDACTED] ID Badged individuals must remain within twenty-five (25) feet and in direct visual contact at all times of the authorized [REDACTED] ID Badged individual.
5. Any transfer-of-custody of escorted non-[REDACTED] ID Badged individuals must be positively transferred with a clear and mutual transfer of responsibility. Failure to comply may result in the loss of [REDACTED] ID Badge privileges.
6. Un-badged Individuals cannot be escorted more than 3 days (72 Hours), without approval from the Airport Security Coordinator (ASC).

Any deviation or modification to the above requirements must be approved by the ASC prior to the escort.

_____	_____	_____
Person Granted Escorted Authority (Print)	Person Granted Escort Authority (Signed)	Date

_____	_____	_____
Certifying Official (Printed)	Certifying Official (Signed)	Date

\*\*\*I understand that this privilege applies only to the company requesting escort privileges. Certifying Official initials

ASC/Alt ASC Approval \_\_\_\_\_

October 3, 2018

## SECTION 6: MONITORING/RECORD KEEPING

### Key Considerations

- More than half of all airports interviewed do not conduct specific record keeping of escorted individuals. These airports expect the badge holders, authorized signatories, tenants, etc., to maintain responsibility for persons under escort.
- The majority of large hub airports require a check-in procedure and issue a visitor pass to the individual under escort. However, these same large airports often do not require a check-out procedure. Some note when visitor passes are returned and/or government-issued identifications are retrieved, if required to be left at check-in.
- Airports that keep a log to record escort activity do so either digitally—using basic software, a customized database, or an Identity Management Systems (IDMS)—or manually in a handwritten log.
- Airports that issue escort passes either distribute them at check-in to the individual, or a set number are distributed in advance to authorized signatories and companies for their use.

### 6.1 Overview

There is great variation across and among airports of all sizes regarding their approaches to monitoring and/or keeping records of escorted individuals. Monitoring generally consists of (1) logging and recording escort activity, (2) check-in and check-out procedures, and (3) the issuance of visitor passes. These three areas are often related and done in tandem, though some airports conduct only one or two of these monitoring activities.

Some airports report they do not have centralized monitoring processes in place, and they expect authorized signatories to employ adequate systems to monitor escorting activity. Logs that are kept by tenants or other companies as required by airports are subject to audits and review by airport operations.

### 6.2 Logging and Record Keeping

Airports that choose to log and record escort activity report doing so to track escort activity in alignment with their security culture, and to identify trends in escort activity. With an accessible record of individuals who have been at the airport, operators and managers are able to identify the number of times an individual has used the escort process, and whether the individual has exceeded the frequency or duration of allowed visits. One large hub airport recently began electronically monitoring escort activity, and plans to use the data to determine whether limits should be adopted.

When logs are kept, they generally record the name of the person under escort, the person conducting the escort, time of the escort, and other identifying information. One medium hub airport maintains a handwritten log of individuals under escort that captures their name, time in and time out, escort pass number, and name of badge holder performing the escort. Often this information is recorded in a shared database. Some airports employ cost effective standard software packages, while other airports use software options that are integrated with systems in place.

### 6.3 Check-in and Check-out Procedures

Most airports do not require individuals under escort to check in at a designated location or with a designated department, under the rationale that the badge holder providing the escort is the responsible

party. For example, one airport with a centralized check-in procedure requires that airport operations be notified by telephone both at the beginning and end of an escort. Other airport check-in procedures typically include a government-issued identification check, and may include recording the information in a log or issuing a visitor pass.

Very few airports require a check-out procedure. At one medium hub airport, escorted visits begin at the credentialing office. The individual under escort is given a pass. The credentialing office also records the name, driver's license number, and airport ID of the individual conducting escort. The driver's license of the escorted individual is held until the visit concludes, at which point the individual returns their pass and receives their license. At the end of the visit, the office shreds identifying documentation, and no record is kept.

## 6.4 Visitor Pass Issuance

Many airports, of all hub sizes, do not issue escort passes, citing logistical reasons. For example, one large hub airport shared that there is no centralized point of distribution where all individuals could go to receive their pass. Creating such a location would be logistically complex for both the airport and the authorized signatories.

As discussed in **Section 4: Escort Indicators**, some airports' escort visitor passes are customized with the escorted individual's information, while others that are distributed and pre-positioned with authorized signatories and airport departments are not customized. It is important for the pre-positioned passes to be properly accounted for, so airports generally assign these passes a specific number and record the badge holder or tenant to whom the passes are assigned. This practice helps with recovery of lost passes.

One medium hub airport that distributes over 1,000 escort visitor passes per year requires companies to return the expired passes at the end of the year in order to be issued current passes. While this airport does not have check-in or check-out procedures, they do expect companies to maintain control of the issued escort passes.

## SECTION 7: LIMITS

### Key Considerations

- Airports report two types of limits: the number of visits an escorted individual is allowed and the length of time of the escorted visit. After the limit is reached, the individual must submit to the badge application process.
- Whether to allow a potential employee to be escorted during the vetting process to obtain a permanent badge varies by airport.
- Airports report that setting or enforcing limits is difficult without supportive technology (i.e., searchable databases and records of escorted individuals).

### 7.1 Overview

Approximately half of the airports interviewed have limits on the number and/or duration of escorted visits allowed. In general, limits are established to ensure that individuals and companies do not use the escorting process to bypass the proper credentialing and vetting process. Airports that do not have technology in place to support tracking these limits rely on authorized signatories and companies to ensure the limits are maintained and enforced. At smaller airports, enforcement can be achieved through direct observation, such as security personnel walking the airport footprint and recognizing that someone has been on site longer than the limit allows.

### 7.2 Examples of Limit Options

One large hub airport has recently implemented an limit of five visits in 365 days. The airport had previously permitted visitors to be escorted an unlimited number of times, but investigation found that companies were using the escort procedures to bypass the credentialing process. When the airport embarked on new construction projects, a similar situation presented itself regarding day laborers. It was determined that this continued use of the escort procedures could compromise security, in that persons were continuously accessing TSA restricted areas without any form of background check. In response, the airport instituted a policy that a given individual may only use the escort system five times within a 365-day period. The period starts on the person's first visit/issuance of a visitor badge. If a sixth visit is sought, the person is denied access unless a justified exemption is submitted and approved by security management. If an exemption is not permitted, the person is advised that they must submit to the badge application process and will be denied further access. This policy has been communicated to all airport signatories. The security department conducts quarterly audits for policy enforcement. The auditing process will grow more robust with the expected addition of a credentialing management system.

Another large hub airport limits escorted visits to five times per calendar year. Requests for an exception to this limit must be communicated in writing to the Airport Security Coordinator (ASC) for consideration prior to the visit. This airport relies on its IDMS to track escorted activity.

### 7.3 Obstacles Associated with Enforcing Limits

It was noted by multiple airports that it is difficult to enforce limits without support technology, such as a database that tracks escorting activity or an IDMS. These provide information on the number and length of visits. One small hub airport imposes a two-week limit on escorted visits, and relies on direct observation to detect non-compliance; there is no record of escorting activity. One large hub airport has a seven-visit lifetime limit for escorts. However, their database retains only three years of data so that is

the threshold for their look-back period. Another large hub airport has a 30-day limit for escorted individuals, however they do not have an effective method for tracking the actual length of time.

Interestingly, one small hub airport imposes no limits on the frequency of escorts. However, an individual performing work for longer than a 24-hour period must initiate the credentialing process.

## SECTION 8: VETTING

### Key Considerations

- Most airports do not conduct background checks on escorted individuals, as there is no regulatory requirement for them to do so.
- Some airports conduct background checks on escorted individuals using TSA’s Secure Flight Database and/or CHRC.
- Some airports maintain an internal Badge Denial List or Stop List. Individuals seeking escort are checked against these lists to ensure that they were not previously denied a badge or had their badge suspended or revoked.

### 8.1 Overview

TSA’s Secure Flight program screens aviation passengers and certain non-travelers before they access airport Sterile Areas or board aircraft.<sup>2</sup> Secure Flight compares an individual’s information to the No Fly and Selectee List components of the Terrorist Screening Database, and to other watch lists maintained by TSA. TSA-approved purposes for non-traveler access include airport operator permission to allow entry into the Sterile Area for any official purpose, such as construction, maintenance, and inspection of airport facilities. These non-travelers are screened against watch lists by airport and aircraft operators who have access to the Secure Flight system via the eSecure Flight portal.

A CHRC is required for applicants seeking unescorted access to the SIDA. Airport operators are also required to submit applicants’ biographical information for a Security Threat Assessment (STA), which includes multiple database checks conducted by the TSA. 49 CFR §§ 1542.209 and 1544.229 include a list of criminal offenses that disqualify an applicant or current employee from receiving an airport ID badge that authorizes unescorted access to the SIDA.

As detailed in *PARAS 0029 – Criminal History Records Checks (CHRC) and Vetting Aviation Workers Guidebook*, the CHRC system specified for airport and air carrier use is the Interstate Identification Index. This information system is used to exchange criminal history records and related information between federal, state, and local criminal justice agencies, and is managed by the FBI.

There is no regulatory requirement stating that individuals seeking escorted access must undergo a background check.

### 8.2 Vetting Options

Of the 25 airports interviewed, only five vet escorted individuals seeking single-day escort access. Of these, four use Secure Flight—through either the eSecure Flight portal or a DHS router—and one airport uses a state-level CHRC.

Airports have access to the Secure Flight system to screen non-travelers via the eSecure Flight portal. One medium hub airport vets every individual prior to their visit through the eSecure portal, which is run out of the credentialing office. If the credentialing office is closed when an escort occurs, the eSecure vetting process is conducted when the office next opens, even if the escort has already been completed.

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<sup>2</sup>Airline employees and airport workers are also screened against the watch lists on a daily basis.

The eSecure portal can take two to three hours to return results. For faster, near real-time results, several airports choose to use a third-party service provider with access to the DHS router. A list of certified service providers that connect directly to the DHS router for watch list screening is available on the Homeland Security Information Network in the conference titled Airport Security Program Amendments; the subtopic is Final National ASP Amendment – TSA NA 18-01 Airport Access and Vetting.

One airport made the unusual decision to seek DHS router certification for itself. In 2018, TSA regulatory changes prompted this large hub airport to evaluate their vetting process for escorted individuals. The airport considered working with a third-party service provider with DHS router certification or working with their airline partners who also had the certification. Instead, the airport chose to pursue its own DHS router certification, the first airport in the country to do so.

Completing DHS router certification and integrating with the airport IDMS and access control systems was a significant undertaking that involved coordination with United States Customs and Border Protection (CBP), TSA, DHS and the airport authority. Following the 15-month certification process, the airport IT department developed the necessary customized interface between the DHS router and the airport IDMS. The airport now has extensive in-house vetting capability coupled with check-in procedures for visitors, including the issuance of temporary passes. All escorted individuals must provide a government-issued photo ID that is run against all required external and internal lists in a “one-stop shop” process.

One large hub airport conducts a more limited CHRC at the state level for individuals under escort. This airport states that visitors who have an operational need to access the restricted area under escort are required to successfully pass this CHRC prior to issuance of a visitor pass. This is done in accordance with their ASP.

Other options for vetting include checking individuals against badge denial lists and/or stop lists. While some airports only use these checks for badge applicants, other airports have found it to be a useful check for escorted individuals. One large hub airport uses three internal checks as part of its vetting process. The person seeking escort is run through (1) their IDMS, which validates there is no past suspension or revoked ID badge history; (2) an internal database that validates the person has not been previously denied an ID badge; and (3) another internal database that validates the individual has not received more than four temporary badges in the past year.

### 8.3 Vetting Considerations

Conducting background checks on individuals under escort is a resource-intensive endeavor. It requires the availability of airport personnel and/or the appropriate technology to perform the checks.

One large airport embarking on a terminal redevelopment process reviewed and revised their escorting program, including enhanced vetting procedures. The airport identified a need for a special temporary access pass program that allows individuals to be escorted while in the credentialing process. These individuals must have extenuating circumstances requiring them to work on-site before they are able to obtain a badge, such as an immediate need for on-site access to address specific, unforeseen construction concerns. To be eligible for this program, a company must first be approved. Once the general contractor is approved, their direct employees and sub-contractors are eligible to request the temporary pass. Airport security has the right to approve or deny the request; if approved, the individual’s information is sent to the credentialing office to be vetted through eSecure. A paper pass is printed with an embossed security seal that the individual must carry and present if challenged.

## SECTION 9: TECHNOLOGY OPTIONS

### Key Considerations

- Some airports have not invested in advanced technology for monitoring escort activities, citing cost as a factor.
- Airports report using software systems, IDMS, and internally created databases to support escorting by tracking badges, maintaining logs, and monitoring escort activity.
- Some airports use portable badge readers and hand-held devices to check databases and records. Airports state these devices and programs are relatively inexpensive and easy to implement at smaller airports.
- Airports rely heavily on internal IT departments to support their technology solutions.

### 9.1 Overview

Most airports do not use technology to support their escorting programs, citing associated costs, lack of resources, or insufficient need. However, nearly all airports recognized the benefits of technologies for increased situational awareness, data capture regarding escort activity, and real-time monitoring. Six of the 25 airports interviewed stated that they do use technology for logging and recording escort activity, and to assist with vetting escorted individuals.

Airports do not always deploy an “out-of-the-box” solution; the systems are often configured and modified to integrate with existing resources. As such, airports found it difficult to capture exact costs associated with their technologies. Also, the availability of human capital to design and create internal IT solutions for escorting programs is a difficult cost to isolate and capture. The forthcoming *PARAS 0038 – Airport Guidance for IDMS* will examine the decisions during IDMS planning, procurement, implementation, and operation to ensure system effectiveness.

### 9.2 Database Systems

As noted in *PARAS 0029 – Criminal History Records Checks (CHRC) and Vetting Aviation Workers Guidebook*, a growing number of airports use an electronic database or system, such as an IDMS, to collect badge application information and disqualifying crimes attestation from the applicant. Some airports use their IDMS to record escort activity as well. As detailed in Case Example #1 in Section 14, one large hub airport requires the sponsoring authorized signatory to apply via the IDMS system on behalf of the person who requires the escort. Case Example #2 in Section 14 describes, another large hub airport that requires every individual seeking to obtain an escort pass to be checked against Secure Flight (via a service provider that has access to the DHS Router) and their IDMS, which validates that the individual has no past suspended or revoked badge history.

Other airports use a variety of approaches and technologies to create databases for tracking and monitoring escort activity. As detailed in Case Example #5, the operations center at one small hub airport uses software to help manage their escorting program. All data pertaining to the person under escort is captured in this system. This allows the airport to monitor and track escorting activity, and gives the airport the ability to run detailed reports.

One large hub airport was hesitant to install a visitor management system because of the associated costs. They then discovered that a software platform already in use had the functionality to create a web

form to track escorted individuals. The web form allows them to collect the data and is the first step in a data-driven approach to escort management.

### **9.3 Devices**

One large hub airport uses Portable Badge Readers (PBR). A PBR is a mobile phone with a single application installed that integrates with the airport's IDMS. Names of any non-badged persons, including escorted individuals, who enter through designated access points are entered into the PBR and checked against the IDMS and airport databases. These checks determine if the individual has been denied a badge, if their badge is revoked or suspended, if they have completed training, and if a badge in their name has been lost or stolen.

### **9.4 A Robust IT Department**

Airports with more advanced technology solutions also have robust IT departments. Airport operators and security personnel acknowledged these departments as crucial to the success of their escorting operations. One large hub has a dedicated security technology team. Another large airport stressed the importance of their innovative IT department, which has the ability to build and integrate the internal databases required for the multi-step background check for all individuals under escort.

## SECTION 10: STAKEHOLDER COMMUNICATION

### Key Considerations:

- Airports with the most effective escorting communication strategies explain the “how” and the “why” to all stakeholders.
- Publicly posting materials explaining escorting rules, policies, and penalties for companies, authorized signatories, and badge holders can increase awareness and understanding.
- Publishing escorting information on a publicly accessible website can increase awareness and understanding, provided no SSI is included.
- Including escorting as part of targeted security communications keeps the issue top of mind.

### 10.1 Overview

As explained in *PARAS 0020 – Strategies for Effective Airport Identification Media Accountability and Control*, airport communications are most effective when they explain specifically what they want community members to do and highlight the consequences of their actions from both a risk and penalty perspective. Compliance with badge-holder requirements is highest when people know what they need to do, believe they can meet the goal, and understand that compliance is worthwhile.

These principles can be applied to escorting in that an effective communication strategy discusses both the how and the why. The “nuisance factor” is often the primary motivation behind abuse of escorting privileges. Airport employees, contractors, and vendors may fail to see how their behavior, and their desire to avoid long lines at security or to avoid the credentialing process, can increase their airport’s security vulnerability. Thus, escorting policies will be most effective when combined with clearly communicated risks and penalties, as well as a strong culture of accountability.

### 10.2 Communication Materials

Printed materials discussing escorting policies can assist an airport with promoting awareness, reinforcing the importance of the rules, and supplementing instruction received during training. One large hub airport has an escort summary sheet (shown in Figure 10-1), which was created by the Airport Police Department. In large, easy-to-read font, the document reviews escorting procedures, who can and cannot be escorted, and what to do if violations are witnessed; it also communicates that non-compliance may result in civil and/or criminal penalties. The information on the sheet is reviewed during SIDA training. The sheet is passed out annually during their security consortiums, and is also attached once per year to a monthly newsletter sent to all authorized signatories at the airport. The airport expects signatories to receive, read, and disseminate all communications to their companies’ employees.

Figure 10-1. Example Escort Handout



**AIRPORT POLICE DEPARTMENT**

International Airport



## Escort Procedures

- Persons authorized to perform escorts must have an "E" displayed on their airport-issued security badge.
- The escort must be in the performance of their official job duties and must be able to monitor, direct and control the actions of the escorted person.
- Individuals who are escorted into Sterile or SIDA areas without being screened through the checkpoint must remain under escort until they submit to screening or exit the security area.
- A person may not escort more than four vehicles at one time unless authorized by the Airport Security Coordinator or designee.
- All persons under escort must possess valid government-issued photo identification such as passport, driver's license or military identification card.
- Escort authority is not granted to individuals who have committed security violations or other criminal offenses on airport property within the previous year.

**Who can be escorted:**

- Someone with a lower security badge type.
- Someone in a short-term capacity (up to 7 days):
  - a repairman
  - prospective employee for an interview
  - attendee to a meeting

**If you see violations of any of these escort rules and regulations...**

**Please contact Airport Police immediately by dialing 911**

**Who cannot be escorted:**

- Badge holders who do not have their badge with them.
- Employees with a revoked or suspended badge.
- Someone currently in the badging process.
- Someone who applied for and was denied a badge.
- Someone who needs access for more than 7 days in a lifetime.
- Un-badged persons with no legitimate reason to have access.

Failure to follow escort policy could result in civil and/or criminal penalties.

Ordinance 117.2.4: [REDACTED]

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Airports can also provide non-SSI information in pamphlets or small handbooks in their credentialing office or online to ensure stakeholders have access to relevant information. One large hub airport created a pocket guide that details security policies, including those related to escorting, as a resource for use during training or testing.

### 10.3 Communication Strategies

Engaging directly and regularly with all stakeholders on security-related issues contributes to a strong security culture. One medium hub airport has found it effective to communicate directly with construction companies to explain the importance of complying with escorting policies and procedures.

When a new project is initiated, airport access control/credentialing personnel attend the pre-construction meeting to explain the credentialing and escorting processes. This direct communication, early in the life of a project, has proven an effective strategy.

One medium hub airport posts escorting rules and regulations on its website and emails them to authorized signatories. When the rules were recently revised, the security team held a number of meetings with airport tenants to discuss the impacts. Another medium hub airport conducts security briefings, which include a review of escorting rules, at its monthly airport managers meeting.

One large hub airport has an effective process for sharing security-related information through briefings, emails, and distribution of security advisories. Instituted shortly after the events of 9/11, this process features a security briefing hosted by airport leadership every weekday with leadership from airport tenants and security teams. In addition, the airport distributes a quarterly advisory email to tenants that communicates major policies and security advisories, and reiterates escorting and temporary visitor pass procedures.

#### **10.4 Communication Barriers**

Some airports identified barriers associated with escorting communications. One airport has traditionally relied on the initial SIDA training to describe escorting policies and procedures. However, it is also wary of creating an “information overload” when onboarding a new employee. The airport shared that it is hesitant to issue fliers describing escorting procedures because some of the information is SSI.

## SECTION 11: RELATIONSHIP TO AIRPORT SECURITY PROGRAM

### Key Considerations

- Airports operating under 49 CFR § 1542 with scheduled airline operations are required to have a TSA approved ASP.
- TSA may work with airport management to develop an ASP that meets the regulatory requirements and addresses the unique attributes, layout, and operating environment of the airport.
- Airports retain some discretion as to the level of detail regarding escorting policies and procedures to include in the ASP. Some airports choose to include specifics, while others do not.
- Some airports choose not to include specific details of their escorting program in a desire to maintain flexibility, respond to circumstances on an individual basis, and to protect any information that is SSI.

### 11.1 Overview

Airports subject to 49 CFR § 1542 are responsible for implementing security requirements, including procedures for escorting individuals who do not have unescorted access authority to the restricted areas of the airport, as described in their ASP.<sup>3</sup> These procedures should address (1) how airports will ensure that escorted individuals are performing functions that conform to the reason access was granted and (2) how law enforcement support will be provided. An airport operator has some flexibility to develop and implement procedures unique to their individual airport, with approval from the airport's FSD. TSA recognizes that each airport may have layout or design factors that require consideration in the implementation of an ASP.

### 11.2 Defining Airport-Specific Escorting Procedures in the ASP

Nearly half of all airports interviewed indicated that their ASP does not include some of the details of their escorting program that are provided to badge holders during training and described in other internal airport documents. Examples include the ratio of escorted individuals to escort badge holders or the distance to be maintained in relation to escorted individuals. Two reasons were most frequently cited for this: a desire to maintain flexibility and respond to circumstances on an individual basis, and the requirement to protect any information that is SSI.

Details set forth in the ASP are subject to TSA action. Multiple airports expressed concern that they could be disciplined in the event of a deviation from specific policies documented in their ASP, and therefore it was easier not to include.

A number of airports that exceed what is required for escorting by 49 CFR § 1542, as a way to meet internal security goals and enhance the overall security culture at the airport, also limit the escorting details provided in the ASP. While additional escorting procedures were implemented, many airports reported not specifying these measures in the ASP to increase the flexibility for the ASC to exercise discretion and authorize situational deviations.

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<sup>3</sup> The complete regulatory history is provided in Section 2.

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The GAO's Report to Congressional Requesters, *Aviation Security TSA Could Strengthen Its Insider Threat Program by Developing a Strategic Plan and Performance Goals* (2020) further supports these findings:

Airport operators and air carriers may also choose to implement measures beyond what is required by TSA, but they may choose not to pursue incorporating these additional measures into their security programs, because if incorporated into their security programs, TSA could then hold the regulated entities accountable for implementing such additional measures. By not incorporating the additional measures into their security programs, airport operators and air carriers retain the flexibility to alter such measures without TSA approval. (p. 8)

Another concern in limiting specific details within an ASP is confidential information. One large hub airport shared that they do not document their escort ratio in the ASP because the ASP is SSI. Their concern is that this fact may prohibit them from training and communicating escort ratio information broadly with airport stakeholders. Although some information from SSI documents can be extracted and shared when on its own it is not considered SSI, it is still a complicated issue for airports to navigate.

## SECTION 12: ACCOUNTABILITY REQUIREMENTS AND ENFORCEMENT

### Key Considerations

- Many airports have developed a progressive penalty structure, some involving monetary fines and/or suspension of access until retraining is accomplished.
- Airports report issuing fines and revoking privileges to penalize companies that are not following the rules, though audits are rare.
- Incentive programs seem effective at participating airports. Components of incentive programs may include monetary and non-monetary options.

### 12.1 Overview

Badge holders with escort privileges and authorized signatories/companies are responsible for anyone under their escort. While all airport badge holders are subject to challenges and fines from TSA, airports employ various methods to hold badge holders, authorized signatories, and companies accountable for escort activity.

49 CFR § 1542 regulations require an airport to include procedures in its ASP to address activities other than those for which escorted access was granted, and to take action in accordance with the ASP. Airports have developed formal procedures to take action on such activities.

### 12.2 Penalty Structure

Multiple airports have a formal Notice of Violation (NOV) procedure to be followed in the event of a security violation. For example, if an escort is found to be an inappropriate distance from the escorted individual, a NOV would be issued for improper escort. One large hub airport issues security violations from its airport compliance division.

One third of the airports interviewed impose monetary penalties for escorting violations; two thirds impose non-monetary penalties, which range from retraining, to temporary badge suspension, to permanent badge suspension. Two airports impose both monetary and non-monetary penalties. All airports retain the right to permanently revoke a badge if it is deemed necessary.

#### Sample Progressive Penalty Structure

1st occurrence: \$162.00

2nd occurrence: \$207.00

3rd occurrence: \$320.00

4th occurrence: Badge Revocation

SIDA badge holders must retake training after each violation

One large hub airport takes a phased approach: a non-critical violation is written up and copied to the authorized signatory of the company. The violation is recorded to capture a pattern in the event of future violations. Critical violations result in immediate badge revocation followed by a hearing process.

One airport reports they are using a new program to “coach for compliance.” They are striving to correct on the spot when possible to avoid the formal security violation.

### 12.3 Incentive Programs

The airports interviewed employ a wide array of formal and informal incentive programs, all of which are considered to be effective. Components of incentive programs include non-monetary options, such as employee acknowledgements in newsletters or recognition at safety meetings. Other programs involve the use of monetary rewards or gift cards.

Several airports reported that they do not have formal incentives in place, but noted that they try to acknowledge when individuals or companies are maintaining security procedures. One airport recognizes worthy individuals, including authorized signatories, in their monthly email. Another airport recognizes employees with notable achievements at the monthly security meeting.

Monetary rewards for reporting non-compliance activity are common. Most rewards range from \$5–\$25, usually in the form of a gift card. One medium hub airport has a security awareness program that allows the ASC or operations supervisor to reward an individual with a \$100 gift card if they are seen performing a security procedure correctly. One small hub airport has a tiered reward system, depending on the severity of the violation that is reported. The highest tier is awarded to an individual for reporting a major security failure, such as an unescorted vehicle. The reward value is up to \$250, and the awardee is recognized by the airport commission and issued a certificate acknowledging their service.

## SECTION 13: NON-AVIATION FINDINGS

Escorting is not unique to airports; various non-aviation entities mandate that visitors and/or vendors be escorted during site visits. For example, escorting programs are in place at many hospitals, secure office towers, federal buildings, and other transportation hubs. The Project Team reached out to several entities to learn more about their approaches, policies and procedures, and technologies that might prove useful for airport operators. The team interviewed representatives from several non-aviation entities, including a defense contractor, a Level I Trauma Center, and an entertainment production studio.

### 13.1 Private Defense Contractor

This private sector defense contractor is located on a 44-acre campus with seven main buildings and eight smaller buildings. They have a visitor management program that allows certain individuals unescorted access, while other visitors must be under constant escort while they are on site. Visitors with a pre-existing relationship with the company who arrive with a passport or birth certificate for verification may be provided unescorted access. Adults with a “business nexus” must be escorted at the ratio of 1:10. Juveniles and/or foreign nationals must be escorted at a ratio of 1:6. Those with unescorted access are working on the honor system, though there is significant CCTV coverage and an active security force monitoring the campus.

### 13.2 Hospital / Level I Trauma Center

This large hospital utilizes a visitor management and vendor management system, depending on the nature of the visit. Visitor management is primarily used for the family members and guests of patients. Vendor management is used for individuals, third-party contractors, and vendors with a business purpose. The Project Team focused on vendor management, as this cohort more closely aligns with the escorted population at most airports.

For vendor management there are specific policies and procedures for escorting non-badged individuals. The hospital uses a healthcare vendor credentialing system, which requires the vendor to upload specific documents addressing confidentiality (HIPAA), safety (including workplace violence and infection prevention), and medical information (proof of vaccinations, etc.) Vendors are required to submit their information to the system 48 hours in advance of their planned arrival. The company that employs or sponsors the vendor is required to have run a background check on the individual, and submits verification of this to the hospital through the credentialing system.

Upon arrival, vendors check in at an electronic kiosk, and provide their name and the password associated with their credentialing system account. A paper ID badge is printed with their name and photo, as well as the name of their sponsoring escort and the areas of the hospital area they are permitted to visit. Vendors are required to display the hospital-issued ID badge as well as their official company badge while on the hospital premises. Vendors must also sign out at the kiosk at the end of each visit.

A majority of badged hospital employees have escort privileges. The badged employee must maintain visual control of the escorted individual. Anyone has the right to challenge; it is an expected component of their security culture. Vendor compliance often relies upon their desire to maintain a positive working relationship with the hospital. In the event that an escort engages in activities other than what is intended, there is escalation to the area supervisor, health system security, compliance, and law enforcement, if needed. The hospital reserves the right to sanction and/or ban vendors who are found to be out of compliance.

### 13.3 Entertainment Studio/Production Lot

This entertainment studio/production lot spans 440 acres with 150 buildings, and uses a fully integrated visitor management system. The studio maintains three different programs: visitor management, vendor management, and contractor/construction management.

All visitors must be sponsored by an approved studio employee; roughly 10% of all employees have the authority to sponsor a visitor. Vendors visiting fewer than two times per week also follow the visitor policy. Upon arrival, the visitor's government-issued identification is verified, and they are given a temporary pass; pass colors change daily. Access is restricted to the area where the sponsoring employee works, but physical escorts are not required. The temporary passes for visitors/vendors include the visitor's name, the name of the sponsor and location/area for the visit. The visitor must wear the pass on a lanyard at all times. Rules and regulations are printed on the back of the pass.

For vendors and construction workers visiting the lot twice per week or more, the parent company (i.e., FedEx) must be registered in the visitor management system. Contractors/construction workers are also pre-registered. Once on campus, they are limited to their prescribed areas, however they do not receive temporary passes. To manage "exfiltration" from construction areas into non-construction areas, the studio relies on physical monitoring. The entertainment studio's security program is supported by an access control system, cameras, license plate readers, and drones deployed throughout the property.

### 13.4 Critical Infrastructure Escorting Best Practices

The Cybersecurity and Infrastructure Security Agency (CISA) is a federal agency<sup>4</sup> that works with partners in the public and private sectors to defend against threats to critical infrastructure, including digital, physical, man-made, technological, and natural threats. CISA helps organizations better manage risk and increase resilience using all available resources, whether provided by the federal government, commercial vendors, or their own capabilities.

The Project Team spoke with the Protective Security Advisor (PSA) for the Southern California division of CISA, who provided insights on best practices surrounding escorted visits to secure facilities.

The PSA works with critical infrastructure facilities throughout California—examples include government buildings, high-rise office buildings, shopping malls and places of worship—to help secure their facilities against an active shooter, cyberattack, and/or other terror threats. As part of the security review, the PSA asks every site owner/operator whether they have a site security plan and whether it contains policies or procedures specific to escorting. During the review, the PSA also shares known best practices for escorting at secure facilities including:

- Visitor Pass – Best practice is for the pass to include a photo so that the pass is non-transferable.
- Check-Out Procedure – Best practice is to have individual return to the security desk, sign out, and surrender their visitor badge. Signing out is important to know exactly who is on property.
- Vetting Procedure – Best practices vary depending on the sensitivity of the site and whether access is sought during or after standard business hours.
- Escort Ratio and Monitoring – Best practice is to limit the escort ratio to no more than 5 or 6 persons per escort.

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<sup>4</sup> CISA was created through the Cybersecurity and Infrastructure Security Agency Act of 2018, which rebranded DHS's National Protection and Programs Directorate (NPPD) as CISA, and transferred resources and responsibilities of NPPD to the newly created agency.

## SECTION 14: CASE EXAMPLES OF SUCCESSFUL PROGRAMS

In the following pages are five examples of airports, each with a strong security culture and a comprehensive, cohesive escorting program. The case airports include three large hubs, one medium hub, and one small hub.

### 14.1 Case Example #1

This large hub airport has robust escorting policies and procedures that are supported by an effective security information sharing process. Information is shared through briefings, emails, and distribution of security advisories. The airport states the benefit of a close working relationship with their local TSA. The airport authority also works closely with state police, and imposes fines for non-compliance and security violations.

Instituted shortly after the events of 9/11, the airport's leadership hosts a security briefing every weekday with leadership from its airport tenants and security teams. In addition, the airport distributes a quarterly advisory email to tenants that communicates major policies and security advisories, and reiterates escorting and temporary visitor pass procedures.

Every individual under escort receives a temporary pass. To obtain an escort pass, the sponsoring authorized signatory applies via the IDMS on behalf of the person who requires the escort. All applicants are required to pass a state-level CHRC prior to issuance of the temporary pass.

Escort passes are to be worn at all times. To enter an access controlled door, the individual under escort must display their pass to the camera prior to entering, while being escorted by a SIDA badge holder. This practice allows the person monitoring the camera system to verify that the individual is properly escorted and is not piggybacking.

This airport has a formal process to enforce escorting policies and procedures. Rules and regulations have been codified into the law, enabling law enforcement officers to issue citations for violations. This airport maintains the flexibility to fine companies or employees for violations. Unlike many other airports, fines are not standardized, and are issued at the discretion of the airport legal team.

### 14.2 Case Example #2

This large hub airport has a comprehensive escorting program that is supported and enhanced by a robust IT department and innovative technologies. To support their strong security culture, the airport maintains an extensive vetting, monitoring, and record-keeping system for escort activities.

The airport has developed a very efficient in-house program for processing and issuing temporary passes, which allows contractors and incoming staff to begin working, under escort, while awaiting a permanent airport badge. Two types of temporary passes are issued for escort activities: a 24-hour pass and a 30-day pass. Thirty-day passes are printed with the pass holder's name and expiration date. The 24-hour pass is not personalized, but says "Limited Term" in all caps.

To obtain either pass, the individual is vetted through four processes and databases, including Secure Flight (via a service provider that has access to the DHS Router); IDMS, which validates there is no past suspension or revoked ID badge history; an internal database that validates the person has not been previously denied an ID badge; and another internal database that validates the individual has not received more than four temporary badges in the past year.

Each of the four checks displays either a green or red light to the security officer. The individual seeking escorted access must receive four green lights to receive an escort pass. The entire process for all internal and external checks takes approximately 35 seconds. This airport stressed the importance of their innovative IT department, which has the ability to build and integrate the internal databases required for the robust background check for all individuals under escort. An analysis of the data shows that the system denies airport access to approximately 50 individuals per year who otherwise would have been admitted.

This airport stresses the connection between security and behavior. Signage throughout the airport reinforces escorting rules. The airport is also creating a short video about escorting rules that will be played throughout the restricted areas of the airport. Improper escorting is a security violation, and there is a progressive penalty structure with steep fines: \$1,000 for the first violation, \$2,000 for the second violation, and \$3,000 for the third violation and every violation thereafter.

### 14.3 Case Example #3

This large hub airport has developed an effective vetting program for individuals under escort that exceeds regulatory requirements to match airport security objectives. The airport has a strong security culture; airport administration and security personnel regularly formalize security procedures with specificity in their security programs. The airport prides itself on a positive relationship with their local TSA and a proactive security culture.

In 2018, TSA regulatory changes prompted the airport to evaluate their vetting process for escorted individuals. The airport considered working with a third-party service provider with DHS router certification or working with their airline partners who also had the certification. Instead, the airport chose to pursue its own DHS router certification, the first airport in the country to do so.

Completing DHS router certification and integrating with the airport IDMS and access control systems was a significant undertaking involving coordination with TSA, DHS, CBP, and the airport authority. A key step was the development of an Intergovernmental Service Agreement that was applicable to an airport rather than an airline. The airport also stressed the importance of their dedicated security IT department.

Following the 15-month certification process, the airport IT department developed the necessary customized interface between the DHS router and the airport IDMS. The airport now has extensive in-house vetting capability coupled with check-in procedures for visitors, including the issuance of temporary passes.

All escorted individuals must provide a government-issued photo ID that is run against all required external and internal lists in a “one-stop shop” process. A color-coded pass is then issued for the escorted individual to gain access to the Sterile Area through a TSA checkpoint. The badge of the person providing escort is color-coded to designate escort privileges.

### 14.4 Case Example #4

At this medium hub airport, 100% of badge holders have escorting privileges. With so many people having the right to escort, the airport worked closely with their local TSA and instituted strong monitoring and vetting procedures to ensure robust oversight of their escorting program.

Individuals under escort are issued an escort pass to be worn around the neck on a lanyard and displayed at all times. The escort pass is made of hard plastic, and has a unique color that is easily recognizable and differentiated from permanent badge holders. The color changes on an annual basis. The front of the pass states “VISITOR must be under ESCORT.” The back of the pass lists the rules of the escorting program. Each pass has a unique number for monitoring purposes.

Each visitor is vetted through the eSecure portal run by the credentialing office. If the office is closed when an escort occurs, the eSecure vetting process is conducted when the office next opens, even if the escort has already been completed. A handwritten log of individuals under escort captures their name, time in and time out, escort pass number, and the name of the badge holder performing the escort.

At the completion of the visit, all escort passes must be returned to the credentialing office. There is a drop box outside the office for visits that conclude when the office is closed. If a pass is not found in the morning following an escort period, access privileges of the person who performed the escort are revoked until the escort pass is returned.

## 14.5 Case Example #5

This small hub airport has a robust escort monitoring program in place. They prioritize and emphasize the importance of knowing who occupies the restricted areas of the airport at all times.

Escorting is primarily used for construction and deliveries; airport operations must be contacted before and after each escort. The operations center uses software to help manage their escorting program. All data pertaining to the person under escort is captured in this system. This process allows the airport to monitor and track escorting activity, and gives the airport the ability to run detailed reports.

The airport does not limit the frequency of escorts. However, a person performing work for longer than 24 hours must initiate the credentialing process. While the vetting process for the badge is underway, the individual is issued a temporary visitor pass, which must be worn at all times. The pass is easily recognizable in red and black with a large “E” on front. The temporary pass also hangs horizontally rather than vertically.

Airport operations personnel conduct regular badge challenges to enforce escorting policies and procedures. If there is non-compliance, the ASC will conduct an interview with the badge holder in violation; retraining is the usual next step. Repeat offenders encounter a progressive fee structure, and the airport authority reserves the right to revoke any badge at any time. While there is not a formal incentive program to promote compliance, the airport verbally acknowledges compliant badge holders.

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