

**DHS' and TSA's Compliance
with Public Law 114-278,
Transportation Security Card
Program Assessment**





DHS OIG HIGHLIGHTS

DHS' and TSA's Compliance with Public Law 114-278, Transportation Security Card Program Assessment

December 14, 2018

Why We Did This Audit

In accordance with Public Law 114-278, *Transportation Security Card Program Assessment* (public law), the Department of Homeland Security and the Transportation Security Administration (TSA) are required to take actions to improve the Transportation Worker Identification Credential (TWIC) program, and the Office of Inspector General must evaluate the implementation of these actions. Our objective was to determine DHS' and TSA's compliance with the public law's requirements.

What We Recommend

This report contains no recommendations.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

The Department of Homeland Security (DHS) did not promptly fulfill its first requirement mandated by Public Law 114-278. Specifically, DHS delayed commissioning a comprehensive assessment of the effectiveness of the Transportation Security Card Program in enhancing security and reducing security risks for facilities and vessels. The public law required the assessment to begin no later than 60 days after its enactment. However, DHS did not award a work order for the assessment for more than a year after the deadline.

TSA only partially complied with requirements mandated by the public law. Of the six required actions, TSA partially complied with two and fully complied with four. For the two partially complied with items, TSA did not:

- identify best practices for quality assurance at every stage of the security threat assessment in its comprehensive risk analysis; or
- provide sufficient documentation or clearly state how it would address all recommended additional internal controls identified in the risk analysis.

Furthermore, we have concerns with aspects of TSA's responses to all of the required actions.

S&T and TSA Responses

The DHS Science and Technology Directorate (S&T) and TSA did not provide formal comments as this report contains no recommendations.



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Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

December 14, 2018

MEMORANDUM FOR: Thomas L. Bush
Assistant Administrator
Office of Intelligence and Analysis
Transportation Security Administration

Robert P. Burns
Principal Director
Office of Innovation and Collaboration
DHS Science and Technology Directorate

FROM: Sondra F. McCauley 
Assistant Inspector General for Audits

SUBJECT: *DHS' and TSA's Compliance with Public Law 114-278,
Transportation Security Card Program Assessment*

For your action is our final report, *DHS' and TSA's Compliance with Public Law 114-278, Transportation Security Card Program Assessment*. We incorporated the technical comments provided by your office, where appropriate. The report identifies actions taken by DHS and TSA to address requirements under the public law. The report does not include any recommendations and no further action is required.

Consistent with our responsibility under the *Inspector General Act* and the public law, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Don Bumgardner, Deputy Assistant Inspector General for Audits, at (202) 981-6000.



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Background

Following the September 11, 2001 terrorist attacks, the *Maritime Transportation Security Act of 2002*¹ (MTSA) required the Department of Homeland Security (DHS) to prevent unauthorized individuals from having unescorted access to secure areas of MTSA-regulated facilities. It also required DHS to issue biometric transportation security cards to individuals having access to secure areas in port facilities. As a result, DHS established the Transportation Worker Identification Credential (TWIC) program to help protect critical portions of the Nation's maritime transportation infrastructure from acts of terrorism. The Transportation Security Administration (TSA) and the United States Coast Guard (Coast Guard) jointly manage the TWIC program. TSA is responsible for issuing TWIC cards by verifying an applicant's identity and conducting background checks to deny or approve a TWIC. The Coast Guard is responsible for enforcing the use of TWICs, TWIC program and other MTSA regulations, and access control procedures at our Nation's ports.

The goal of the TWIC program is to prevent access to secure areas at ports by known and suspected terrorists or criminals who might pose a security risk to our maritime transportation sector. TSA's Security Threat Assessment (STA) process serves to (1) identify any known or suspected ties to terrorism, (2) evaluate any criminal history for disqualifying factors, and (3) ensure legal immigration or citizenship status.

On December 16, 2016, Congress passed Public Law 114-278 (public law), *Transportation Security Card Program Assessment*, to address concerns from the Government Accountability Office (GAO) about the need to improve the TWIC program (see appendix A for a list of prior reports related to the TWIC program). Section 1(a)(2) of the public law requires TSA to take six specific actions to improve the vetting process, including a comprehensive risk analysis of security threat assessment procedures. The public law also requires DHS OIG to evaluate TSA's implementation of the actions and submit a report to Congress no later than two years from enactment of the public law.²

On February 3, 2017, TSA issued a task order to the DHS Federally Funded Research and Development Center (FFRDC)³ known as the Homeland Security Operational Analysis Center (HSOAC), operated by the RAND Corporation, to conduct a comprehensive risk analysis of TWIC security threat assessment procedures. HSOAC delivered its final report to TSA on December

¹ Pub.L. No. 107-295.

² Pub.L. No. 114-278, Section 1(a)(3).

³ An FFRDC is a government sponsored, contractor operated, research institution established with the purpose of meeting some special long-term research or development need, which existing in-house or contractor resources cannot meet as effectively.



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29, 2017. We held our initiation meeting for this review with TSA on August 7, 2018. The public law requires the OIG to deliver a report to Congress no later than December 16, 2018. However, because TSA is still in the process of implementing changes and enhancements to some internal control and quality control elements of the TWIC program, we are unable to evaluate full implementation in our report.

The public law at section 1(b) requires DHS to commission a comprehensive assessment of the effectiveness of the Transportation Security Card Program in enhancing security and reducing security risks for facilities and vessels. Section 1(c) requires DHS to submit a corrective action plan to Congress if the assessment identifies any deficiencies in the program. The law also requires the OIG to review the extent to which any corrective action plan implements the requirements established in section 1(c).

Like TSA, DHS selected HSOAC to conduct the Transportation Security Card Program assessment. DHS' Science and Technology Directorate (S&T) provides an appropriateness review and certification for use of FFRDCs, including HSOAC. DHS components work through the S&T FFRDC Program Management Office to establish tasking and funding on related contracts.

DHS Was More Than a Year Late in Starting Its Overall Assessment of TWIC Program Effectiveness

DHS did not promptly fulfill its first requirement in the public law. Specifically, section 1(b)(1) requires DHS to “commission an assessment of the effectiveness of the transportation security card program . . . at enhancing security and reducing security risks for facilities and vessels” no later than 60 days after the date of enactment of the public law. DHS did not meet this requirement because it awarded a work order for its assessment to HSOAC on February 26, 2018, more than one year later than the public law stipulated. The assessment's estimated completion date is April 27, 2019. If the assessment identifies any deficiencies in the TWIC program's effectiveness, DHS must submit a corrective action plan to Congress. The public law requires OIG to review the extent to which any corrective action plan implements the requirements established in section 1(c).

DHS OIG previously reported that DHS was late in awarding the work order for the assessment because it experienced challenges identifying an office responsible for the effort.⁴ Currently, an S&T official oversees section 1(b) of the public law, which requires DHS to commission a comprehensive assessment of the TWIC program. S&T plans to forward the completed assessment to TSA,

⁴ *Review of Coast Guard's Oversight of the TWIC Program*, OIG-18-88, September 28, 2018.
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Coast Guard, and the DHS Office of the Secretary. If the assessment identifies deficiencies, the public law requires DHS to prepare a corrective action plan. However, DHS has not identified a point of contact to oversee preparation of a corrective action plan, should one be required. The late start of the assessment delays DHS' ability to implement any needed changes to improve the effectiveness of the TWIC program.

TSA Partially Complied with Two Actions of the Public Law and Complied with the Other Four

TSA partially complied with two of the six required actions in the public law and complied with the remaining four required actions. Table 1 details the public law requirements and identifies the status of each required action.

Table 1: Summary of TSA's Actions to Comply with the Public Law

Required Action	Public Law Requirements for TSA	Status
A	Conduct comprehensive risk analysis of STA procedures to (i) identify internal controls needed and (ii) identify best practices for quality assurance (QA) at every stage of the security threat assessment process.	Partially Complied
B	Implement additional internal controls and best practices identified under (A).	Partially Complied
C	Improve fraud detection techniques, such as (i) by establishing benchmarks and a process for electronic document validation; (ii) by requiring annual training for Trusted Agents (TA); and (iii) by reviewing any security threat assessment related information provided by TAs and incorporating any new threat information into updated guidance under subparagraph (D).	Complied
D	Update the guidance provided to TAs regarding the vetting process and related regulations.	Complied
E	Finalize a manual for TAs and adjudicators on the vetting process.	Complied
F	Establish quality controls to ensure consistent procedures to review adjudication decisions and terrorism vetting decisions.	Complied

Source: Prepared by DHS OIG with information from section 1(a)(2) of the public law

We were not able to fully address Congress' requirement to evaluate TSA's implementation of the required actions identified in the public law because TSA is still in the process of implementing elements of the required actions in the TWIC program. However, we have concerns with aspects of TSA's responses to all of the required actions.



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TSA Partially Complied with Required Action A – Conduct a Risk Analysis

Section 1(a)(2)(A) of the public law requires TSA to conduct a comprehensive risk analysis of security threat assessment procedures, including—

- (i) identifying those procedures that need additional internal controls; and*
- (ii) identifying best practices for quality assurance at every stage of the security threat assessment.*

TSA partially satisfied the requirement to conduct a comprehensive risk analysis (HSOAC risk analysis) of STA procedures. Although TSA completed a comprehensive risk analysis and made recommendations pursuant to its analysis, it did not clearly identify best practices for QA as required by the law.

The HSOAC risk analysis comprehensively evaluated controls at every stage of the TWIC process from enrollment through card revocation. The analysis, which HSOAC delivered to TSA on December 29, 2017, identified 43 existing controls that ensure the security of the TWIC program. The HSOAC risk analysis also identified 19 control gaps and recommended additional internal controls in the STA process. HSOAC used GAO's *Standards for Internal Control in the Federal Government* as a framework for an effective internal control system. The analysis also identified the TWIC program's business processes, documented the control environment for each major process stage of the STA, and reviewed the program's risk management plans.

Although the HSOAC risk analysis is comprehensive, it did not clearly identify QA best practices, as required. GAO defines best practices as "processes, practices, and systems identified in public and private organizations that performed exceptionally well and are widely recognized as improving an organization's performance and efficiency in specific areas." TSA tasked HSOAC to review other successful credentialing oversight programs to identify alternative or additional best practices. Although the HSOAC risk analysis' scope of work included a review of other credentialing programs, TSA did not require HSOAC to document the results of this review, or to identify alternative or additional best practices in the final report.

HSOAC's final report indicated TSA has strong controls in the STA process; however, the report does not explain how other credentialing programs could apply these controls as best practices. Also, the HSOAC risk analysis does not describe how TSA could use best practices from government or private sector programs to improve the efficiency or effectiveness of the STA process.



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Additionally, HSOAC's methodology had limitations. TSA approved HSOAC's methodology, as described in the final report, which relied on observations and high-level interviews. For example:

- The HSOAC risk analysis' focus was to evaluate the STA process in order to identify existing controls and recommend additional controls. However, HSOAC did not test existing controls and did not assess the effectiveness of TSA's controls.
- HSOAC predominantly interviewed TWIC leadership instead of the individuals who carry out the STA process.
- HSOAC noted areas of concern from prior GAO and OIG reports, but did not interview GAO and OIG personnel to obtain their perspectives.

HSOAC may have missed some vulnerabilities in its risk analysis since it did not conduct security testing. Furthermore, without clearly identifying best practices, TSA could be missing ways to leverage the successes of other credentialing programs to operate the TWIC program more effectively.

TSA Partially Complied with Required Action B – Implement Additional Internal Controls

Section 1(a)(2)(B) of the public law requires TSA to implement the additional internal controls and best practices identified under subparagraph (A).

TSA partially complied with the required action to implement the 19 recommended additional internal controls identified in the HSOAC risk analysis. We reviewed documentation TSA submitted for other required actions, which overlapped with parts of required action B. TSA submitted additional documentation for 15 of the 19 HSOAC recommendations; however, due to time constraints and the volume of documentation provided, we conducted a high-level review of this new information. We were unable to follow-up with TSA to obtain supporting documentation to verify what actions the component had taken to address the 19 HSOAC recommendations.

Based on our documentation review and the summary of actions TSA provided, we determined that TSA:

- implemented or partially implemented 9 of the 19 recommendations;
- did not implement 6 recommendations; and
- did not provide sufficient information for us to determine what actions TSA took on 4 recommendations.

Table 2 summarizes OIG's assessment of TSA's actions to implement internal controls and address recommendations from HSOAC's risk analysis.



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Table 2: Summary of TSA’s Actions to Address HSOAC’s Recommendations

Control Area	Implemented/Partially Implemented	Did Not Implement	Unable to Determine	Totals
Identity Verification	1	1	0	2
Vetting	0	1	2	3
Adjudication	3	2	1	6
Redress	3	1	1	5
Revocation and Suspension	2	1	0	3
Total	9	6	4	19

Source: OIG analysis based on TSA documentation and responses

TSA failed to provide documentation to support its decisions to not implement 6 of the 19 recommendations and failed to clearly explain its decisions for another 4 recommendations. Until TSA addresses all 19 recommendations, it may be overlooking vulnerabilities in the STA process and opportunities to improve the TWIC program. This may result in individuals obtaining TWIC cards who may pose a security risk to our Nation’s maritime facilities and vessels.

Three months before the public law passed, DHS OIG recommended that TSA conduct a comprehensive risk analysis of the STA processes to identify areas needing additional internal controls and QA procedures. The recommendation further required TSA to develop and implement those procedures, including periodic reviews, to evaluate their effectiveness.⁵ This OIG recommendation, which remains open, aligns directly with required actions A and B of the public law. Accordingly, DHS OIG will further evaluate TSA’s responses and documentation in order to close out the recommendation.

TSA Complied with Required Action C – Improve Fraud Detection Techniques

Section 1(a)(2)(C) of the public law requires TSA to improve fraud detection techniques by establishing benchmarks and a process for electronic document verification; by requiring annual training; and by reviewing relevant vetting information and incorporating new information into guidance.

⁵ TWIC Background Checks are Not as Reliable as They Could Be, OIG-16-128, September 1, 2016.



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TSA complied with the requirement to improve fraud detection techniques by establishing benchmarks and a process for electronic document verification. According to TSA, it implemented the birth verification service as one of the fraud detection techniques; however, TSA uses it in a limited capacity. We did not verify the extent to which TSA uses the service or its effectiveness. The HSOAC risk analysis also recommended other fraud detection techniques, such as the Social Security Number Services and Facial Recognition Tools. However, TSA did not implement these techniques. According to TSA officials, TSA cannot mandate the use of Social Security numbers due to privacy concerns. TSA officials also stated they would need to evaluate the accuracy and security capabilities, costs, regulatory requirements, and actions required to train TAs on the use of facial recognition technology before making a decision to implement.

The public law requires TAs receive annual training. TSA provided a copy of the contract for enrollment services that requires annual training to enhance the knowledge of TAs in identifying potentially fraudulent identity documents. Training is delivered through a variety of methods such as instructor-led classes, hands-on events, computer-based training courses, virtual webcasts, and video tutorials.

Lastly, TSA also complied with the requirement to review relevant security threat information provided by the TAs. According to TSA, if TAs suspect a fraudulent document, they note their concerns in the system for TSA's Program Management Office to review. Even though TAs may include comments about potential fraudulent documents, the application process continues. If, following a review of the TA comments, TSA confirms that fraudulent documents were used, it can take one of four actions depending on the status of the applicant's adjudication: stop the enrollment, stop the credential's production, pull the credential from the Enrollment Center card batch, or cancel the TWIC card after production.

TSA Complied with Required Action D – Update Guidance to TAs on Applicant Vetting

Section 1(a)(2)(D) of the public law requires TSA to update the guidance provided to Trusted Agents regarding the vetting process and related regulations.

We interpreted this part of the public law to include two separate requirements: 1) update guidance to TAs on the enrollment process and related regulations; and 2) update guidance to adjudicators on the vetting process and related regulations. TAs are contractors who work at the Enrollment Centers and are responsible for assisting applicants with the enrollment process. TSA's adjudicators work in the Adjudication Center (AC) and are responsible for



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reviewing applicants' information as part of the vetting process to determine if disqualifying factors are present to either approve or deny applications.

TSA complied with the requirement to update guidance to TAs on the vetting process and related regulations in the Enrollment Agent (EA) Training Manual and EA Briefing Documents.⁶ TAs receive information on new processes or regulations through updates to the EA Training Manual and regular EA Briefing Documents. All TAs maintain a current copy of the EA Manual, which contains documents on all training aspects of enrollment and customer service activities. The contractor updates the manual regularly as program policies and requirements change.

We reviewed whether TSA updated guidance to adjudicators on the vetting process and related regulations. TSA provided updated guidance to adjudicators in the AC Training Manual and through interim guidance. According to TSA officials, TSA updates the AC Training Manual annually while interim guidance is distributed (via email), as needed. Adjudicators are responsible for maintaining and using interim guidance until the next annual AC Training Manual update. The process of collecting and storing interim guidance separate from the AC Training Manual may result in adjudicators not using the most current guidance to make adjudicative decisions.

TSA Complied with Action E – Finalize a Manual for TAs and Adjudicators on the Vetting Process

Section 1(a)(2)(E) of the public law requires TSA to finalize a manual for TAs and adjudicators on the vetting process.

TSA complied with the requirement to finalize a manual for TAs and adjudicators for the vetting process. On June 16, 2018, the contractor finalized the EA Training Manual for TAs. Further, TSA finalized the AC Training Manual for adjudicators on November 15, 2017. The finalized AC Training Manual is a collection of policies, procedures, guidance, emails and memorandums, some dating back to 2007. In addition, the manual contains numerous embedded documents.

As OIG previously reported,⁷ the AC Training Manual is the primary reference tool for adjudicators to use as they do not use standardized checklists or specific workflows for adjudicating cases. Adjudicators told the prior audit team that the manual was difficult to use to adjudicate cases based on its format. Since then, TSA has finalized the AC Training Manual and added a

⁶ TSA uses the term TA and the contractor uses the term EA for the same role.

⁷ *TWIC Background Checks are Not as Reliable as They Could Be*, OIG-16-128, September 1, 2016.



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fully indexed table of contents along with hyperlinks to specific information. Although we were unable to interview adjudicators to learn how the finalized manual assisted them in their work or if it was useful, we still found the manual disorganized and some guidance was duplicative, contradictory, and outdated. A disorganized training manual with outdated policies, procedures, and guidance may hinder adjudicators' ability to make appropriate, timely, and consistent decisions.

TSA Complied with Action F – Establish Quality Controls for Reviewing Adjudicative and Terrorism Vetting Decisions

Section 1(a)(2)(F) of the public law requires TSA to establish quality controls to ensure consistent procedures to review adjudication decisions and terrorism vetting decisions.

TSA complied with the requirement to establish quality controls for ensuring consistent procedures to review adjudication decisions and terrorism vetting decisions. Specifically, under TSA's Office of Intelligence and Analysis, the AC and the National Transportation Vetting Center (NTVC) adopted QA Standard Operating Procedures (SOPs) to address the requirement. The AC has QA SOPs for reviewing cases with and without disqualifying factors, dated July 31, 2018. The NTVC has QA SOPs for terrorism vetting cases, dated September 14, 2018.

Although TSA has QA SOPs for both adjudication decisions and terrorism vetting decisions, we could not test to verify whether TSA consistently applied these quality assurance procedures in its reviews. We found the QA SOPs did not contain sufficient details on all procedures, such as a random sampling methodology for adjudication cases. We also noted the NTVC recently implemented a QA program and issued SOPs of its own for reviewing terrorism vetting cases. However, it is too early in the implementation phase to determine whether NVTC's QA procedures ensure consistency. Additionally, we did not interview AC or NTVC personnel to verify whether TSA consistently applies the QA review process across the adjudication and terrorism vetting decisions. Without consistent procedures and quality controls in QA reviews, TSA may be missing errors made by the adjudicators and terrorism vetting analysts. As a result, TSA may inadvertently issue TWIC cards to individuals who might pose security risks to our maritime transportation sector.

Conclusion

Without implementing all of the public law's required actions, DHS and TSA may be putting our Nation's maritime ports and vessels at risk. For instance, DHS' late start in conducting a comprehensive TWIC assessment will delay its ability to identify and implement any changes to improve the effectiveness of



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the program. If the assessment identifies any deficiencies in the TWIC program's effectiveness, DHS is required to submit a corrective action plan. However, DHS has not identified a point of contact to oversee preparation of the corrective action plan, should one be required.

Further, TSA's partial compliance with specific requirements of the public law could threaten the safety and security of our Nation's ports and vessels. For example, without identifying best practices of other successful credentialing programs, TSA could be missing ways to improve and operate the TWIC program more effectively. The primary purpose of the STA process is to ensure only eligible individuals receive TWIC cards. However, TSA may have overlooked vulnerabilities in the STA process by not fully implementing additional internal controls identified in the HSOAC risk analysis. Such vulnerabilities increase the risk of unauthorized individuals gaining access to our Nation's maritime facilities and vessels.

We will monitor DHS' and TSA's progress in the implementation of actions required in the public law through our recommendation follow-up activities⁸ and additional oversight activities⁹ and notify Congress of any changes.

Management Comments and OIG Analysis

We discussed the results of our review with TSA and S&T officials during our audit and at an exit conference with TSA officials on November 14, 2018. S&T and TSA officials provided technical comments to our report on December 6th and 7th, 2018 and informed us that they would not provide formal responses since the report did not have recommendations. We made changes to the report to incorporate their technical comments, where appropriate.

Objective, Scope, and Methodology

DHS OIG was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

DHS OIG prepared this report for Congress as required in the public law. It is one of a series of audit, inspection, and special reports prepared as part of our

⁸ As stated earlier in this report and listed in Appendix A, DHS OIG completed prior oversight reports addressing the TWIC program which included recommendations that remain open. *TWIC Background Checks are Not as Reliable as They Could Be*, OIG-16-128, September 1, 2016 and *Review of Coast Guard's Oversight of the TWIC Program*, OIG-18-88, September 28, 2018.

⁹ Section 1(d) of the public law requires the OIG to review the extent to which any corrective action plan implements the requirements established in section 1(c).



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oversight responsibilities to promote efficiency and effectiveness within the Department. The objective of our review was to determine DHS' and TSA's compliance with requirements in Public Law 114-278, *Transportation Security Card Program Assessment*. Our independent evaluation focused on actions TSA implemented to improve the process for vetting individuals, and actions DHS has taken to enhance security and reduce security risks for MTSA regulated facilities and vessels. To answer our objective, we:

- interviewed officials from DHS S&T and TSA's Office of Intelligence and Analysis to understand the TWIC program and DHS' and TSA's actions to address the public law's required actions;
- analyzed prior audit reports issued by DHS OIG and GAO to understand the findings, recommendations, and any associated corrective actions involving the TWIC program;
- researched laws, regulations, and internal policies to identify applicable criteria governing TSA's oversight of the TWIC program's STA process;
- reviewed TSA-provided documentation to support how it addressed the six required actions for section 1(a)(2) of the law, which included the following:
 - for required action A, we reviewed *Effective Internal Controls for TSA Threat Assessments* prepared by HSOAC;
 - for required action B, we conducted a high level review of additional documentation that TSA submitted on October 5, 2018 for 15 of the 19 HSOAC recommendations and verified TSA's implementation status for the remaining 4 recommendations associated with required actions C through F; and
 - for required actions C through F, we reviewed and assessed TSA documentation.

Because of time constraints imposed by the legislative requirement for OIG to report by December 16, 2018, and because TSA is still in the process of implementing elements of the required actions in the TWIC program, our review was limited to a compliance evaluation of documentation. During this review, we did not conduct testing, observations, or interviews with staff to validate the effectiveness of TSA actions. Therefore, we cannot conclude whether TSA's actions will have their intended effect to improve the TWIC STA process.



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We conducted this review between July and October 2018 in accordance with *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency. The report reflects the work we performed pursuant to Section 2 of the *Inspector General Act of 1978*, as amended. Specifically, this documentation review gives information about DHS and TSA actions to address the mandates of P.L. 114-278. We designed this report to keep Congress informed about the progress of corrective actions.

The Office of Audits major contributors to this report are Megan McNulty, Auditor-in-Charge; Carolyn Floyd, Auditor; Stuart Josephs, Auditor; Elizabeth Kelleher, Program Analyst; David Widman, Auditor; Thomas Hamlin, Communications Analyst; Katrina Griffin and Loretta Atkinson, Independent Referencers; John McPhail, Audit Manager; and Shelley Howes, Director.



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Appendix A
Prior Oversight Reports Addressing the Transportation Worker Identification Credential Program

GAO

TRANSPORTATION WORKER IDENTIFICATION CREDENTIAL: Internal Control Weaknesses Need to Be Corrected to Help Achieve Security Objectives, GAO-11-657, May 10, 2011

TRANSPORTATION WORKER IDENTIFICATION CREDENTIAL: Card Reader Pilot Results Are Unreliable; Security Benefits Need to Be Reassessed, GAO-13-198, May 8, 2013

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TWIC Background Checks are Not as Reliable as They Could Be, OIG-16-128, September 1, 2016

Review of Coast Guard's Oversight of the TWIC Program, OIG-18-88, September 28, 2018



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Appendix B
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