TSA Registered Traveler

Security, Privacy and Compliance Standards for Sponsoring Entities and Service Providers

Version 3.1, January 2008

Summary of Changes

Transportation Security Administration

RT Registered Traveler™

Summary of Changes

This summary of changes document outlines changes in Version 3.1 of the RT Security, Privacy and Compliance Standards for Sponsoring Entities and Service Providers (known as the RT Standards).

Note regarding "Gap analysis" justification: There are several directive statements in the main body of the RT Standards that were not directly included in Appendix C controls. TSA performed a gap analysis to ensure that all directive statements are reflected in Appendix C. This update will allow auditors to verify all requirements of the RT Standards by using controls outlined in Appendix C. Corresponding self assessment procedures in Appendix B and audit test procedures in Appendix C are updated to reflect these changes.

#	Section/Paragraph	Change	Justification
1	Section 1.1	Added notice stating required timeframe for compliance with current version of the RT Standards: **"Schedule for Compliance with the RT Standards** **For legacy information systems, SPs are expected to be in compliance with the RT Standards within three months of the publication date unless otherwise directed by TSA. For information systems under development, SPs are expected to be in compliance with the RT Standards immediately upon deployment of the system."**	This notice was added to state required compliance with published standards in regards to IPA attestation, security, privacy and compliance program management. This is inserted into the Introduction of the document as a disclaimer.
2	Section 2.2	Added a definition for common security controls: **"A program-level assessment of Service Provider information security practices facilitate the identification of common security controls that can be applied to one or more SP information systems. Specifically, common security controls can apply to: (i) all SP information systems; (ii) a group of information systems at a specific site; or (iii) common information systems, subsystems, or applications (i.e., common hardware, software, and/or firmware) deployed at multiple operational sites."**	This was added to streamline the System Security Plan (SSP) process by allowing a single Program System Security Plan to cover common controls, with appendices for each SE location.

#	Section/Paragraph	Change	Justification
3	Section 2.2	Revised SSP Requirements to allow SPs to create distributed computing SSPs as described below: **a.** SPs shall perform a program level assessment of the distributed computing environment and identify common security controls. **b.** Common security controls and major functions of the distributed computing environment must be documented in a Program-level System Security Plan (PSSP). **c.** SPs must identify and document site-specific controls in a separate PSSP Appendix (one appendix per site). In this context, a site is defined as a Sponsoring Entity location at which a Service Provider implements information systems. Appendix E of the RT Security, Privacy, and Compliance Standards defines the specific requirements for Site-specific System Security Plans.	This was added to streamline the System Security Plan (SSP) process by allowing a single Program System Security Plan to cover common controls, with appendices for each SE location.
4	Section 3 and App. B, Control 21.1.2	Removed requirement for compliance with Section 508 of the Rehabilitation Act.	Due to the nature of the RT Program and TSA's relationship with SPs, conformance with Section 508 requirements will not be measured or required by TSA.
5	Section 3.4.2	PRE-ENROLLMENT Added the following verbiage: **"TSA considers the commencement of RT operations to occur at the point in time when an RT system is connected to CIMS and TSA begins accepting enrollment applications. When an SE or SP desires to commence RT Participant enrollment prior to receiving an initial TSA approval to provide RT services, appropriate disclosures shall notify enrollees that all such activities are not authorized by TSA, and that TSA is not responsible for loss or theft of applicant enrollment data."**	This verbiage is also included in the Sponsoring Entity Guidelines. The language was added to the Standards for clarification and to facilitate audits.

#	Section/Paragraph	Change	Justification
6	Section 3.4.4	Acceptable Documents to Establish Identity and Eligibility: Added the following verbiage: **"Applicants must present identity documentation that bears their legal name. If the applicant's legal name has changed, he/she must present original or a certified copy of legal documentation that formally changes the applicant's name, including but not limited to a divorce decree, marriage certificate, or a decree to change a name. If the RT applicant submits breeder documents with differing names (i.e., married and maiden names) for the purpose of confirming identity or citizenship/immigration status, the SP will submit both of the applicant's names for TSA review by including the alternate name in the alias portion of submission to CIMS."**	This was added to provide guidance for SPs and SEs for enrollment of RT applicants who submit breeder documents that contain different names.
7	Section 3.4.9	Revised the fingerprint collection requirement to state: **"Fingerprint images, if available, must be captured at enrollment in a manner consistent with the RTIC Technical Interoperability Specification."**	This change was made to align with the RTIC Technical Interoperability Specification.
8	Section 3.5.1 and App. B, 19.1.2 and App. C, VP-1	In the body of the RT Standards, changed the boarding pass verification requirement to refer to applicable TSA regulations and procedures: **"The SE/SP shall ensure that the required traveler identity verification procedures are performed in accordance with applicable TSA regulations and procedures."** Made equivalent updates to Appendix B and Appendix C.	Removed specific travel document checking requirements from the RT Standards.
9	Section 4.2.2	Revised the IPA Attestation Process: SP systems implemented at new SE locations between attestation reporting periods are exempt from pre-operational attestations if certain criteria are met as specified in the SPCS. IPA firms may follow generally accepted sampling techniques during the performance of attestation engagements; however, attestation reports must cover all SP systems and locations that are operational prior to the end of each reporting period. All attestation reports should be submitted to SEs and TSA no later than four weeks following the material completion of the IPA firm's attestation procedures.	This reduces the overall number of IPA attestations that must be submitted by SPs.

#	Section/Paragraph	Change	Justification
10	App. B, Control 14.1.2 and App. C, IR-6	IR-6 INCIDENT REPORTING Stated that organizations must notify TSA of any privacy incidents in accordance with the RT Standards. Added the words **"in accordance with the RT Standards."**	The RT Standards have several RT-specific privacy incident reporting requirements in Section 3.6.1, "Privacy Incidents," that were not specifically stated in Appendix C.
11	App. B, Control 18.3.6, 18.3.7 and App. C, EP-3	EP-3 BIOMETRIC COLLECTION Added: Audit trails exist to uniquely identify EP personnel who collect biometric data **"and operator identity is verified based on a 1:1 biometric verification for each enrollment."** Also added: **"Systematic controls are in place to ensure biometrics are captured in accordance with the RTIC Technical Interoperability Specification."**	Gap analysis between directive statements in the main body of the RT Standards and Appendix C.
12	App. B, Control 18.4.4, 18.4.5 and App. C, EP-4	EP-4 CARD PRODUCTION AND ISSUANCE Added: **"Entity issues RT cards only to individuals with 'approved' TSA security threat assessment determinations at the time of issuance.** **Entity issues and replaces RT cards as necessary and notifies CIMS as required by the RT Standards."**	Gap analysis between the main body of the RT Standards and Appendix C.
13	App. B, Control 18.5.1 and App. C, EP-5	EP-5 DATA COLLECTION & STORAGE (new control) Added: **"Entity maintains archived electronic copies of completed enrollment forms in accordance with its written privacy policy."**	Gap analysis between the main body of the RT Standards and Appendix C.
14	App. B, Control 18.6.1, 18.6.2 and App. C, EP-6	EP-6 EXCESS DATA (new control) **"The entity collects excess data in accordance with the RT Standards.** **The entity ensures there is a logical separation between the collection of excess data and the base RT enrollment screen/form."**	Gap analysis between the main body of the RT Standards and Appendix C.

#	Section/Paragraph	Change	Justification
15	App. B, Control 18.7.1 and App. C, EP-7	EP-7 INFORMATION PROVIDED TO AND RECEIVED FROM APPLICANT (new control) **"The entity informs each applicant in writing that:** • **The RT Program is linked to the national security environment, and TSA can suspend the program at any time if changes in the security environment warrant;** • **TSA considers the commencement of RT operations to occur at the point in time when an RT system is connected to CIMS and TSA begins accepting enrollment applications. When an SE or SP desires to commence RT Participant enrollment prior to receiving an initial TSA approval to provide RT services, appropriate disclosures shall notify enrollees that all such activities are not authorized by TSA, and that TSA is not responsible for loss or theft of participant enrollment data.** • **Payment of a fee to participate in the RT program neither guarantees acceptance in the program nor continued enrollment status;** • **Collection of excess data is neither required nor endorsed by TSA;** • **Excess data is collected for SE and SP use only and not for TSA use;** • **Provision of the excess data to the SP is not required for participation in the RT program; and** • **Iris images may be shared with NIST for purposes of research to develop government standards for the use of iris images.** **The entity obtains and retains explicit digital or physical signature consenting to and understanding that TSA or its agents transmitting an 'approved' or 'not approved' determination of the applicant's TSA security threat assessment directly to the SP. TSA or its agents will not transmit the content of the TSA security threat assessment nor the reason behind the 'approved' or 'not approved' determination."**	Gap analysis between the main body of the RT Standards and Appendix C.
16	App. B, Control 18.8.1 and App. C, EP-8	EP-8 ENROLLMENT CONFORMANCE (new control) **"The entity passes conformance testing for enrollment and passes re-conformance testing after any major system changes."**	Gap analysis between the main body of the RT Standards and Appendix C.

#	Section/Paragraph	Change	Justification
17	App. B, Control 19.3.3 and App. C, VP-3	VP-3 METRICS VP systems maintain sufficient metrics to measure false rejection rates. VPs monitor false rejection rates on a daily basis. Added: **"VPs report metrics as specified in Section 4 of the RT Standards."**	Gap analysis between the main body of the RT Standards and Appendix C.
18	App. B, Control 19.4.1 and App. C, VP-4	VP-4 VERIFICATION CONFORMANCE (new control) **"VP passes conformance testing for verification and passes re-conformance testing after any major system changes."**	Gap analysis between the main body of the RT Standards and Appendix C.
19	App. B, Control 20.3.3 and App. C, PR-3	PR-3 PURPOSE SPECIFICATION Added: **"The entity provides all applicants the TSA Privacy Act Statement at the time of enrollment."**	Gap analysis between the main body of the RT Standards and Appendix C.
20	App. B, Control 21.2.1, 21.2.2 and App. C, RT-1	RT-1 SECURITY STATUS (new control) **"The entity transmits employee information as required for key personnel.** **The entity processes daily updates to card revocation lists as provided by the CIMS."**	Gap analysis between the main body of the RT Standards and Appendix C.
21	App. B, Control 21.3.1 and App. C, RT-2	RT-2 UPDATES TO BIOGRAPHIC INFORMATION (new control) **"The entity re-verifies participant identity documents and recaptures digital images of participant identity documents in accordance with EP-2 whenever a participant reports changes or updates to any of the following:** • **Name** • **Gender** • **Date of Birth** • **Citizenship Status** • **Place of Birth** • **Social Security Number** • **Alien Registration Number** • **Driver's License Number and State** • **Passport Number."**	Gap analysis between the main body of the RT Standards and Appendix C.

#	Section/Paragraph	Change	Justification
22	App. B, Control 21.4.1 and App. C, RT-3	RT-3 RT CARD DEACTIVATION (new control) **"The entity notifies CIMS within 24 hours when a card should be deactivated (when lost, stolen or malfunctioning)."**	Gap analysis between the main body of the RT Standards and Appendix C.
23	App. B, Control 21.5.1, 21.5.2 and App. C, RT-4	RT-4 INTEROPERABILITY (new control) **"The entity does not refuse service to an RT Participant regardless of the SP with whom the RT Participant is enrolled, provided the SP is approved by TSA to provide services.** **The entity allows RT Participants from other SPs to use RT lines at no additional cost to the participant."**	Gap analysis between the main body of the RT Standards and Appendix C.
24	App. B, Control 21.6.1, 21.6.2 and App. C, RT-5	RT-5 APPROVAL TO OPERATE (new control) **"The entity has contracted with a qualified IPA firm to perform an annual attestation of compliance with the RT Standards and required controls.** **The entity has obtained an attestation report and received TSA's initial approval to provide RT services before commencing operations or collection of participant enrollment data for transmission to TSA."**	Gap analysis between the main body of the RT Standards and Appendix C.
25	App. B, Control 21.7.1, 21.7.2, and App. C, RT-6	RT-6 TSA OVERSIGHT (new control) **"The entity includes a provision in their contract with the SE authorizing TSA oversight.** **The entity includes a provision in their contract with the SE allowing TSA to audit or inspect the operational and security controls over the SP's RT program."**	Gap analysis between the main body of the RT Standards and Appendix C.
26	App. E	Created a template for the Program-level System Security Plan Created a template for the Site-Specific System Security Plan Added a table that defines the minimum site-specific controls.	This was added to streamline the SSP process by allowing a single Program System Security Plan to cover common controls, with appendices for each SE location.

Homeland Security

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