

Marine Safety Office Houston-Galveston
Marine Safety Unit Galveston
Vessel Traffic Service Houston

Port Security Information Bulletin
PSIB 18-04

SECURITY OF SENSITIVE INFORMATION IN PERSONAL CREDENTIALS

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Implementation of the International Ship and Port Facility Security Code (ISPS) and the regulations under the Maritime Transportation Security Act (MTSA), have introduced new procedures to ship and facility operations. One of the key security measures is access control whereby all visitors to the ship or facility are positively identified prior to being granted access. This PSIB outlines the minimum security standards formerly required by the COTP guidance prior to the implementation of the ISPS/MTSA requirements. PSIBs 02-03 and PSIB 27-01, which provided Captain of the Port (COTP) security standards that predated the Maritime Transportation Security Act (MTSA) and regulatory requirements, have been canceled because they are codified in the MTSA regulations and security standards are incorporated into Facility Security Plans (FSPs) and Vessel Security Plans (VSPs).

Guidance for acceptable identification is provided for vessels under the ISPS Code, Part B, Paragraph 9.11 which states that the Ship Security Plan "should establish for each security level the means of identification required to allow access to the ship and for individuals to remain on the ship without challenge...Any ship security identification system should, when it is practicable to do so, be coordinated with that applying to the port facility." Facilities are provided similar guidance in the ISPS Code, Part B, Paragraph 16.12. Specific requirements for acceptable credentials are outlined in the MTSA regulations under 33 CFR 101.515- Personal Identification.

Identification standards and procedures for personnel attempting to gain access to facilities or vessels is as follows: All persons entering a waterfront facility, or requesting access to a vessel will possess, and present upon request, to the appropriate authority, a valid photo identification card meeting the requirements of 33 CFR 101.515. Per Coast Guard Commandant (G-MPS), vessels and facilities should not take custody of the identification card. There is no MTSA or ISPS requirement or authorization for facilities/vessels to temporarily take custody of an individual's ID. Vessels and facilities are required to institute an identification system for employees and visitors. Taking control of personal ID's is *not* an acceptable identification system. If a facility or domestic vessel's security plan is currently requiring this procedure, it must be amended and the changes to facility security plans shall be submitted to the COTP for approval. Any amendments to a Vessel Security Plan shall be submitted to the Coast Guard Marine Safety Center per 33 CFR 104.415. Foreign vessels should review and amend their Ship Security Plans to remove any requirement for collection of sensitive information as part of the vessel access control procedures. Any amendments must be submitted for review to its flag administration or Recognized Security Organization, as applicable.

Facilities and/or vessels shall not scan, photocopy, or otherwise record a person's driver's license and/or social security number for retention in a database. Social security numbers are sensitive information and there is no MTSA or ISPS requirement to maintain long-term records of this type. If this procedure is currently in effect at a facility or on a vessel, the applicable security plan must be changed and submitted for review and approval in accordance with procedures noted above. The U.S. Coast Guard will not consider failure to meet any current requirement for collection of sensitive information in access control procedures as a discrepancy, as these practices have a potential to compromise personal and/or port security.

If you have any questions about the ISPS code, MTSA regulations, or vessel security policies addressed in this PSIB, please contact Lieutenant Commander Jane Wong at 713-671-5197. For questions on waterfront facility policies, please contact Lieutenant Christy Rutherford at 713-671-5165.


RICHARD M. KASER
Captain, U.S. Coast Guard
Federal Maritime Security Coordinator