

Office of the Chief Security Officer

SECURITY MANAGERS BULLETIN #2015-03A

TO: JFK Issuing Officers

DATE: July 21, 2015

SUBJECT: RECURRENT CRIMINAL HISTORY RECORDS CHECKS FOR ALL SECURITY ID HOLDERS – GUIDELINES FOR ISSUING OFFICERS

This bulletin is a guideline for JFK Issuing Officers to ensure compliance with the required mandates set forth in Security Directive (SD) 1542-04-08I *Security Threat Assessment and Reporting Requirements Related to Individuals with Airport-Issued ID Media.*

BACKGROUND

Effective July 27, 2015, the Transportation Security Administration (TSA) has directed airports to conduct a **Criminal History Records Check (CHRC)** every two years for all individuals with Airport-Issued Security ID's. This recurrent CHRC requires the re-fingerprinting or re-submittal of fingerprints stored with the Transportation Security Clearinghouse and transmittal of those to the FBI. In most cases, the fingerprint check will be managed through the Security ID Office. For domestic air carriers, the TSA will allow the airport to accept an airline's certification that they have submitted fingerprints for each individual being rebadged and that those individuals have no disqualifying crimes.

IMPLEMENTATION TIMELINE

Renewals July 27, 2015 to September 28, 2015

Renewal applicants who require a recurrent CHRC must bring a Money Order or company check for \$30 and a completed Disposition application upon renewing their Airport ID Card. Should an applicant's CHRC information identify a record, the applicant will be notified and the applicant may need to provide additional documentation in order to adjudicate the record.

The applicant will only have 45 days from renewal date to provide any additional documentation. If additional documentation is not provided, the applicant's ID Card will be revoked and they will be required to start the application process as a new applicant. This process is a temporary interim measure during a transition to a proactive approach as described below.

Renewals after September 28, 2015

For renewals after the transition period (after September 28, 2015), Issuing Officers will need to follow the new procedure as described in "Guidelines" below. This new process will reduce wait times, maximize efficiency and enable the Security ID Office to resubmit employee fingerprints prior to the badge expiration date.

GUIDELINES

The airport has revised the SIDA ID Card renewal process in the following manner. Each Employer Issuing Officer will be responsible to follow these guidelines and must comply with the new requirements, accordingly:

1. Annually, the JFK ID Office will send a comprehensive report that will include the most Recent Fingerprint Date that we have on file for each individual employee within his or her respective company. Each Issuing Officer will be responsible for tracking, updating and utilizing this information in order to ensure they submit to the JFK Security ID Office all required documentation for each employee they are renewing. The report will be sent out no later than Friday, July 24, 2015.
2. Although applicants are required to renew their Airport Issued Security ID every year. The recurrent CHRC mandate only requires us to conduct a recurrent CHRC **every 2 years.**

It will be the responsibility of the Issuing Officer to track and ensure that their applicants are submitted through the correct renewal process each time they are up for renewal.

3. **Timeline:**

a. **60 days prior to employee deactivation/expiration date**

The Issuing Officer must identify those individuals that must go through the recurrent CHRC process. If the applicant has not been fingerprinted within 2 years of their badge expiration date they will need to go through the recurrent CHRC renewal process. If the applicant has been fingerprinted within 2 years of their badge expiration date, they may go through the normal renewal process, which remains the same and unchanged.

b. **60-30 days prior to employee deactivation/expiration date**

The Issuing Officer **must** submit to the JFK Security ID Office *two* completed copies of the JFK ID Card Disposition form as well as a money order or company check of \$30 for each employee that *requires a recurrent CHRC.*

The JFK Security ID Office will stamp both dispositions as received and the second disposition will be returned to the Issuing Officer as a receipt of submission. The JFK Security ID Office will then resubmit any fingerprints on file. If we do not have a fingerprint on file for that employee, the Issuing Officer will be notified and we will require the Issuing Officer to schedule a fingerprint appointment for that applicant as soon as possible.

c. **At a minimum of 10 working days after resubmission date but no earlier than 30 days prior to badge deactivation/expiration date**

The Issuing Officer must inform the applicant to come to the JFK Security ID Office for renewal of their JFK ID Card. The applicant must bring a copy of the renewal ID Card

Disposition Application and any additional paperwork required for renewal, as per the existing renewal process.

4. **Air carriers that conduct the recurrent fingerprint and CHRC adjudication for their employees**, the Issuing Officer must submit the following with **all renewal** applicants at the time of renewal. Each renewal applicant must provide the JFK Security ID Office a completed copy of the Disposition Form.

The revised Disposition Form has been amended to include a fingerprint certification section that must be completed by the Issuing Officer prior to SIDA ID card renewal. This certification section informs the Port Authority that the air carrier has conducted the required CHRC within the last two years and the CHRC did not disclose a disqualifying crime in accordance with Title 49 CFR Part 1544.229. ID cards will not be renewed if the Issuing Officer fails to complete this section in its entirety.

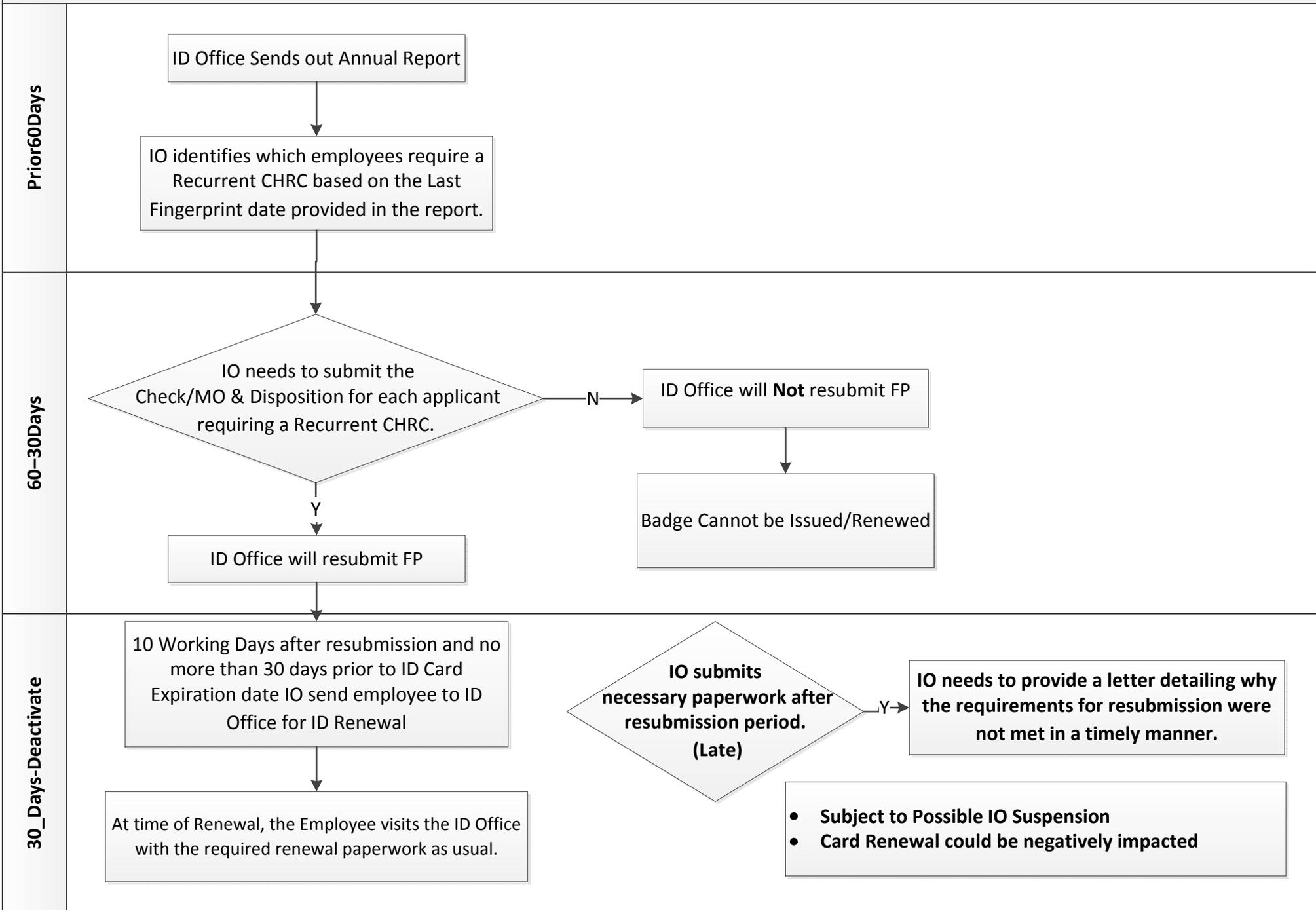
5. **Failure to submit required resubmission documentation in a timely manner** may lead to employee badge revocation, Issuing Officer status suspension and loss of Issuing Officer status.
6. Attached is a comprehensive list of **Frequently Asked Questions** pertaining to the recurrent CHRC process and the changes that have been implemented. This list will serve as guidance for more specific details pertaining to the process. Please reference the list for any questions you may have prior to reaching out to an airport representative.
7. A revised Disposition Form will be emailed to all Issuing Officers prior to July 27, 2015. This revised form must accompany all ID card renewal submittals.
8. A revised ID Badge Application Form for new applicants will be emailed to all Issuing Officers prior to July 27, 2015. This application must be used for all new submittals on or after July 27, 2015.

The JFK Security ID Office will evaluate the new process for conducting renewal ID card issuance and may need to amend the guidelines. We will inform the Issuing Officer Community of any changes or revisions as needed. We anticipate that a majority of current SIDA ID holders will need to complete a recurrent CHRC and/or fingerprinting over the next 12 months. This will increase the processing times in the Security ID Office and we ask all Issuing Officers to plan accordingly. If you have any questions regarding these new guidelines for recurrent CHRC implementation, please contact JFK Airport Security (Andre Garcia, Senior Security Coordinator) at 718.244.4204.

Kim Dickie
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John F. Kennedy International Airport

ISSUING OFFICER PROCESS FLOW GUIDELINE FOR RECURRENT CHRC

Please Note: This is a supplement to Security Manager's Bulletin # 2015-03-A



Frequently Asked Questions

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Recurrent Criminal History Records Checks for All Security ID Holders – Guidelines For Issuing Officers

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- 1) **What constitutes the need for an employee to go through the recurrent Criminal History Records Check (CHRC) renewal process?**
Airport records show that the employee has not been fingerprinted within 2 years of their badge deactivation/expiration date.
- 2) **When should I expect to receive the annual report from the ID Office?**
We will be sending the initial annual report the day following the Security Bulletin subsequent annual reports will be provided to Issuing Officer on July 1st of every year or as requested.
- 3) **My employee requires a Recurrent CHRC, what do I need to provide to the ID Office in order to ensure that my employee is renewed properly?**
You will need to bring two ID Card Disposition Applications and a \$30 Money Order for each applicant requiring resubmission. This paperwork must be turned into the ID Office anywhere between 60-30 days prior to badge expiration date.
- 4) **My employee does not require a Recurrent CHRC since he was fingerprinted within the past 2 years. What do I need to provide to the ID Office in order to ensure that my employee is renewed properly?**
Your employee can go through the existing renewal process as before. Your employee must provide a disposition and any privilege paperwork to the ID Office at time of renewal.
- 5) **If my employee's expiration date falls within the transition period of July 27 - September 28, can the Issuing Officer bring resubmission paperwork to the ID office in advance?**
No. During the transition period resubmissions will only be accepted for individuals who expire in the months of October and November since those will be the ID Cards that fall within the 60-30 day resubmission window.
- 6) **When can I begin resubmitting my employees paperwork if they require a Recurrent CHRC?**
The resubmission period begins 60 days prior to badge expiration date.
- 7) **Can you provide me with an example of how the process will work for a employee who's ID Card Expiration date is October 15th, 2015?**
Yes. The Issuing Officer will have from August 15-September15 to submit a money order/check and two dispositions to the ID Office for Fingerprint resubmission. If the issuing Officer submits the paperwork on August 20th. Then you can inform your applicant that they can come into the ID Office for ID renewal as usual anytime up to 30 days prior to ID Card Expiration Date. If the Issuing Officer submits their paperwork near the end of the resubmission period such as September10th, you can inform your applicants to allow at a minimum 10 days for processing before they come in and renew their airport ID Card.
- 8) **Will the employee need to schedule a fingerprint appointment in order to resubmit his fingerprint file?**
For the majority of our population the Transportation Security Clearinghouse who maintains our fingerprint records will have the employee's last fingerprint on file and we will be able to resubmit that fingerprint without needing to physically take another fingerprint of the individual. In the event that we do not have a file for your employee you will be notified during the

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resubmission period that you will need to schedule your employee to come in for a fingerprinting appointment.

9) Can the Issuing Officer provide a bulk Money Order or Company check for multiple applicants at time of Renewal Submission?

If the company would like to submit multiple renewal applicants under an individual Money Order or Company Check an additional letter on company letterhead must be submitted and it must include the following; Full name of individual, ID Badge Number and the Check or Money Order Number associated with that individual.

10) Can the Issuing Officer provide court documentation during the resubmission process for any arrests that may have occurred since their applicant was last adjudicated?

Yes. I would recommend that Issuing Officers inform their applicants of their last fingerprint date as a best practice and that Issuing Officers ask their applicants in advance of resubmission if they have any court documentation that may be required in order to adjudicate their file.

11) Will the Issuing Officer be receiving an email stating that the employee's resubmission has gone through and that the applicant is ok to come and renew his badge?

No. Due to the large volume of renewals, we will not be providing any renewal notification to the Issuing Officer. The Issuing Officer or applicant will only be contacted if additional documentation is required or if a physical fingerprinting appointment is necessary in order to resubmit the file. We ask that you wait a minimum of 10 working days in order to allow for resubmission processing before you inform your applicant to come into the JFK ID Office for ID Card renewal.

12) Will the renewal applicant still be required to bring a disposition during time of renewal?

Yes. The applicant must still provide all documents that were previously required including a disposition at time of renewal.

13) What if an Issuing Officer fails to submit a Money Order/Company Check and Disposition Application to the JFK ID Office within the 60-30 day resubmission period?

Any resubmissions that occur within the 30day period will require a letter from the Issuing Officer Stating why they failed to meet the required deadline for resubmission. The Issuing Officer is subject to sanctions including suspension and loss of Issuing Officer status if they fail to provide the ID Office with the required documentation during the resubmission period (60-30 day prior to expiration date). The Issuing Officer is also putting the employees badge status at risk by not following the required processes, the JFK ID office will not be at fault for any badge revocations or suspensions due to the inability of the Issuing Officer not following the required resubmission policies and procedures.

14) Will the air carrier still need to submit the \$30 money order if the prints will be processed by the Port under the unique identifier for the airline as opposed to the ports account?

No, the air carrier would not need to submit the \$30 money order if we are printing under your SON.

15) Assuming the Port will fingerprint an applicant under the air carrier's unique identifier, typically how long does it take to get back to the air carrier (if known)?

Typically results from air carriers can take anywhere from 1-4 weeks.

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- 16) If an air carrier employee needs to be fingerprinted by the Port, how soon in advance of the expiration of the ID will you accept someone for fingerprinting?**

Fingerprints can be submitted 60 days before the badge expiration date.

- 17) For an air carrier certifying that fingerprinting occurred in the past two years: does full name include the middle name as well?**

Full name is the applicant's legal name. If the middle name is a part of their legal name, then it must be included.

- 18) As an airline employee, can I still renew my airport ID without a certification letter from my airline employer?**

No

- 19) Are federal agencies and law enforcement entities still exempt from having to complete a CHRC?**

Yes.

- 20) Will renewal applicants employed with two or three companies need to be fingerprinted under each company?**

No, but the badge holder must be fingerprinted within the last two years either provided by the airline or airport.

- 21) What is the procedure for airlines if employee is employed by another company? Will two sets of prints be required?**

No; but the badge holder must be fingerprinted within the last two years either provided by the airline or airport.

- 22) Will random fingerprints continue be a requirement? In addition, if so will it count towards the two-year quota?**

Yes, and yes. Badge holders who were fingerprinted between 7/27/2013 and 7/27/2015 as a result of being randomly selected for a fingerprint may use those fingerprints in lieu of being resubmitted. The report provided to the Issuing Officers includes any random fingerprint data.

- 23) If an employee returns and is expired, how will this be handled? Will they be FP and still obtain the 12 month renewal?**

If the badge is expired for 30 or more after then the applicant will be treated as a new employee. If the badge holder is attempting to renew their ID, which has expired less than 30 days of their badge expiration date, then the applicant will be treated as a renewal. As a result of TSA's federal mandate, those renewing airport ID may be subject to re-fingerprinting based on their last fingerprint date.

- 24) If an employee's CHRC returns as a disqualifying crime will the employer be notified ASAP? and how so?**

The airport will send the employee a written notification to the badge holder and employer.

- 25) How will issuing officers be notified of the last fingerprint date of their employees if it's over 2 yrs?**

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The Fingerprint Date will be tracked by the Issuing Officer. However, the ID Office is working on providing the airport community a master list of all employees and their fingerprint dates.

26) Will the JFK Security ID office accept a resubmission fingerprint date from another airport for the renewal process?

No.

27) Will the airport conduct the recurrent fingerprint for an airline if they are unable to conduct it in-house?

No. Currently we are only conducting fingerprints for any airlines that were being fingerprinted by the ID Office for the new applicant process prior to the mandate.

28) If the CHRC is done every two years, and you have the prints on file, do we have to provide a \$30 check each time we are fingerprinted, or each time our prints are submitted?

Yes, the \$30 dollar check/ money order needs to be submitted each time they are processed through the Federal Bureau of Investigation.

29) Can I request a refund for any resubmission submitted to the ID Office?

The ID office will not issue any refunds for any resubmissions. Once the resubmission is submitted to the ID Office the fingerprints will be resubmitted and therefore PANYNJ will incur the cost of resubmission.

30) Who is the the Money Order/ Check Payable to?

PANYNJ

PANYNJ ONLY

1) How will Multi-Facility ID cards be handled during this process, will they continue to be fingerprinted at JFK?

Anyone in possession of a multi-facility card may be fingerprinted at any airport location.

2) Will I still need to provide a \$30 money order in order to resubmit a PA employee for a Recurrent CHRC?

PA employees are exempt from the \$30 charge since we the PA will be incurring the cost of the fingerprint directly during the resubmission process.