



# Security Profile Development/Maintenance

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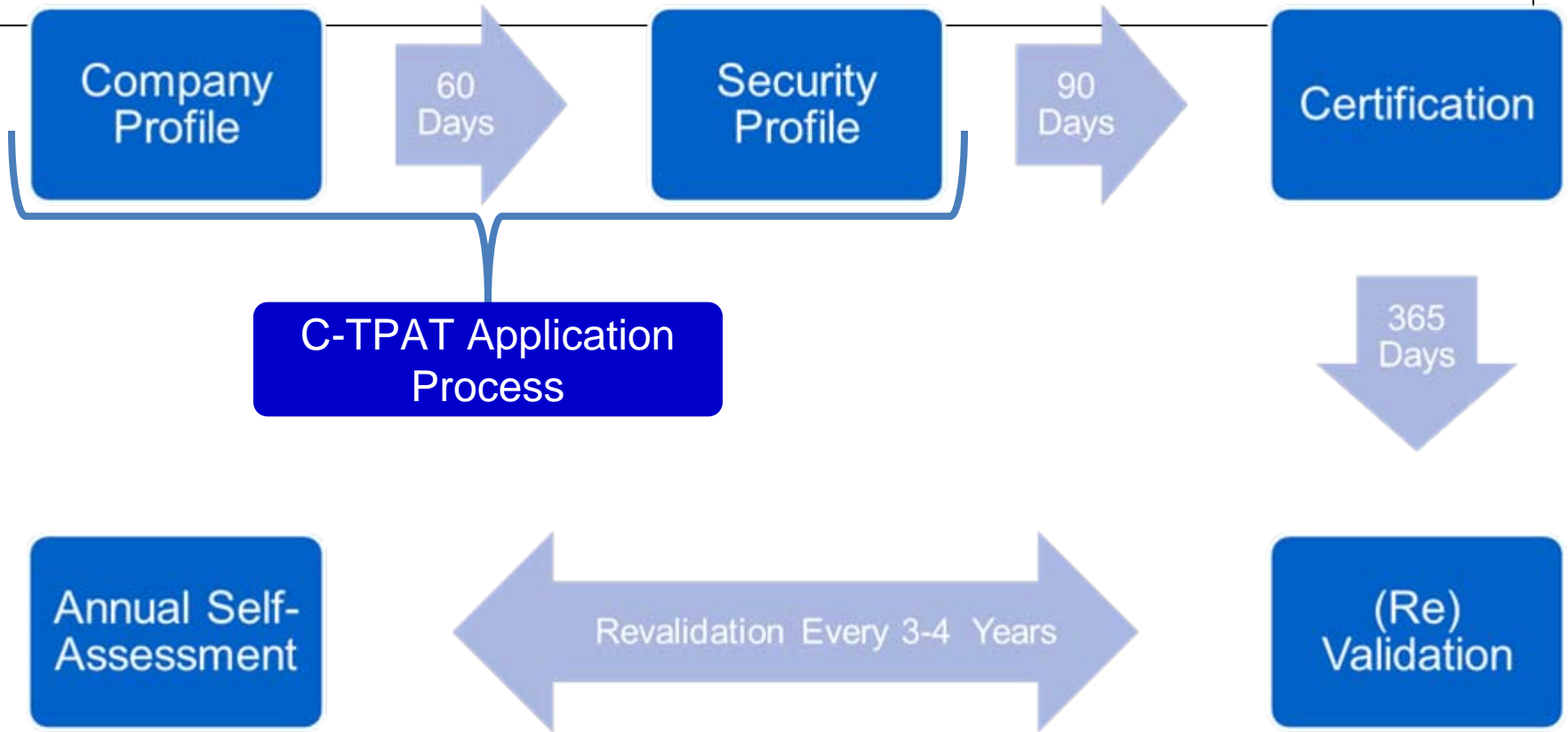
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# C-TPAT Partner Lifecycle



(Re)Validation Process includes the Validation Response  
Profile Updates Record any Changes



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# Good Practices

- Be actively involved in the submission and maintenance of the security profile.
- Modify the security profile as changes occur.
- Regularly review the security profile for accuracy. A review must be done at least yearly.
- Upload documents to the Partner Document Exchange to support statements made in the security profile.
- Be familiar with the minimum security criteria. The highway carrier minimum security criteria can be found at:  
[www.cbp.gov/xp/cgov/trade/cargo\\_security/ctpat/security\\_criteria/hwy\\_carrier\\_criteria](http://www.cbp.gov/xp/cgov/trade/cargo_security/ctpat/security_criteria/hwy_carrier_criteria)
- Contact your Supply Chain Security Specialist if you do not understand the requirements as written in the security profile.



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# Practices to Avoid

- Don't rely completely on a consultant. Be actively involved in the submission and maintenance of the security profile.
- Don't create a security profile that does not reflect what you do.
- Never indicate "not applicable" without an explanation.
- Don't add information that doesn't relate to the requirements addressed in the section. Address each requirement directly.
- Don't copy the minimum security criteria into the Partner Response section of the security profile. Be specific.
- Do not project actions required by the minimum security criteria into the future. Explain what the company is currently doing.
- Many sections of the security profile cover more than one requirement. Address each of the requirements covered in the section.



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# Keep in Mind

- The security profile will not always be accepted as initially submitted. Often the security profile will be rejected at least once.
- The security profile is not a static document. The security profile should be constantly changing.
- The security profile does not address every C-TPAT requirement. There are minimum security criteria not addressed in the security profile.
- The security profile is not created for C-TPAT purposes only. The security profile should reflect the current security processes of the carrier.



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# Keep in Mind

- Employees do need to be familiar with the content of the security profile. Everyone should be trained in the company security policy.
- A carrier that is in compliance with Department of Transportation (DOT) or other government agency requirements is not automatically in compliance with the C-TPAT minimum security criteria.
- DOT safety examination do not necessarily fulfill the conveyance examination requirements of the C-TPAT program.



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# Updating the Security Profile

- The security profile is a living document.
- When changes occur update the security profile information as soon as possible.
- A review and update of the security profile must be done at least yearly.
- When the validation response is submitted the security profile should also be updated.
- If the company's security profile contains inaccurate information that *never* applied that information should be deleted.
- If there have been changes, add the new information but do not delete the old information.
- When adding new information insert the date before typing the new information.



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# Uploading Documents

- Where the criteria requires a written procedure upload a copy of the company's written procedure.
- Upload copies of checklists or spreadsheets used to document procedures.
- If uploading a form provide a completed document if possible. Don't upload blank forms.
- If documents are not in English provide a translation.
- When uploading documents to the Partner Document Exchange don't make the titles too long. This makes them difficult to open.



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# Minimum Security Criteria Not in Security Profile

- The supply chain for highway carriers for C-TPAT purposes is defined from point of origin from the yard or where the tractors and trailers are stored, through pickup at the manufacturer/supplier/vendor, through to the point of distribution – and recognizes the diverse business models C-TPAT members employ.
- These **minimum security criteria** are fundamentally designed to be the **building blocks** for highway carriers to institute effective security practices designed to optimize supply chain performance to mitigate the risk of loss, theft, and contraband smuggling that could potentially introduce dangerous elements into the global supply chain.
- On a **quarterly basis, or as circumstances dictate** such as during periods of heightened alert, security breach or incident, Highway carriers should routinely **assess their degree of vulnerability to risk** and should prescribe security measures to strengthen or adjust their security posture to prevent security breaches and internal conspiracies. The determination and scope of criminal elements targeting world commerce through internal conspiracies requires companies, and in particular, highway carriers to elevate their security practices, especially if the highway carrier has the exclusive benefit of enrollment in the Free and Secure Trade (FAST) program.



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# Minimum Security Criteria Not in Security Profile

- C-TPAT recognizes the complexity of international supply chains and security practices, and endorses the application and implementation of security measures based upon risk. Therefore, the program allows for **flexibility and the customization of security plans** based on the member's business model.
- Appropriate security measures, as listed throughout this document, must be implemented and maintained.
- Conveyance (tractor and trailer) integrity procedures must be maintained to protect against the introduction of unauthorized personnel and material.
- Access controls prevent unauthorized entry to trucks, trailers and facilities, maintain control of employees and visitors, and protect company assets. Access controls must include the positive identification of all employees, visitors, service providers, and vendors at all points of entry. Employees and service providers should only have access to those areas of a facility where they have legitimate business.
- **Written and verifiable processes must be in place to screen prospective employees and to periodically check current employees.**



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# Minimum Security Criteria Not in Security Profile

- Security measures must be in place to ensure the integrity and security of processes relevant to the transportation, handling, and storage of cargo in the supply chain. Procedures must be in place to prevent, detect, or deter unmanifested material and unauthorized personnel from gaining access to the conveyance including concealment in trailers.
- Security procedures should be implemented that **restricts access** to the conveyance and prevents the lading of contraband **while en-route** from facilities in international locations to the United States.
- **Procedures must be in place to record and immediately report all anomalies regarding truck drivers to U.S. Customs and Border Protection. If local, federal, or state laws and union rules permit, conducting random screening of truck driver luggage and personal effects should occur.**
- Procedures must be in place to prevent, detect, or deter unmanifested material and unauthorized personnel from gaining access to conveyance, including concealment in trailers. Cargo handling and storage facilities, trailer yards, etc., **must have physical barriers and deterrents that guard against unauthorized access.** Highway carriers should incorporate the following C-TPAT physical security criteria throughout their supply chains as applicable.



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# Minimum Security Criteria Not in Security Profile

- Truck Carriers shall have a **documented and verifiable process for determining risk throughout their supply chains** based on their business model (i.e., volume, country of origin, routing, C-TPAT membership, potential terrorist threat via open source information, having inadequate security, past security incidents, etc.).



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# Highway Carrier Criteria- Written Procedures/Processes

**Seven** highway carrier criteria require written procedures/processes:

- Highway carriers **must** have **written** and verifiable processes for the screening of business partners, ....
- **Written** procedures **must** exist for screening business partners, which identify specific factors or practices, the presence of which would trigger additional scrutiny by the highway carrier.
- For U.S. bound shipments, C-TPAT highway carriers that subcontract transportation services to other highway carriers, **must** use other C-TPAT approved highway carriers or carriers under direct control of the certified C-TPAT carrier through a **written** contract.
- **Written** procedures **must** exist which identify specific factors or practices, which may deem a shipment from a certain shipper of greater risk.
- Clearly defined **written** procedures **must** stipulate how seals in the highway carrier's possession are to be controlled during transit.
- **Written** procedures **must** be established to record the change in seals, as well as stipulate how the seals are controlled and distributed, and how discrepancies are noted and reported.
- **Written** and verifiable processes **must** be in place to screen prospective employees and to periodically check current employees.



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# Highway Carrier Criteria- Documented Procedures/Processes

**Six** highway carrier criteria require documented procedures/processes:

- To counter internal conspiracies, supervisory personnel or a security manager, held accountable to senior management for security, **should** search the conveyance after the driver has conducted a search. These searches **should** be random, **documented**, based on risk, and **should** be conducted at the truck yard and after the truck has loaded en route to the border.
- Highway Carrier management **must** perform a **documented**, periodic, and unannounced verification process to ensure the logs are maintained and conveyance tracking and monitoring procedures are being followed and enforced.
- If the seal is removed in-transit to the border, even by government officials, a second seal **must** be placed on the trailer, and the seal change must be **documented**.
- Procedures for the issuance, removal and changing of access devices (e.g. keys, key cards, etc.) **must** be **documented**.
- C-TPAT highway carriers **must** have **documented** procedures in place to manage the ordering, issuance, activation, and deactivation of FAST transponders.
- Truck Carriers **shall** have a **documented** and verifiable process for determining risk throughout their supply chains based on their business model



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# Difference Between Written and Documented procedures

- A written procedure is a written document that explains how a task is to be accomplished.
- Recording some part of the process in a document is not a written procedure.
- Documenting a procedure involves a written or electronic record of a task being accomplished.



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# Application of the Criteria to Different Business Models

- The size of a business does not relieve that business from the obligation to meet requirements.
- The nature of the business may relieve that business from the meeting some requirements.
- The size and nature of the business will affect how the requirements are carried out.
- Each criterion does not apply equally to all companies.
- Size of the company does not affect whether procedures need to be in writing or documented.



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# Security Profile

- Expectations of Supply Chain Security Specialist while reviewing and certifying your Security Profile.
- Each section of the profile contains numerous points to be explained during your submission.
- Ensure to address each point of the criteria.
- N/A is never acceptable. Explain your business model.



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# Business Partners

- Highway carriers must have **written and verifiable** processes for the screening of business partners, including carrier's agents, sub-contracted highway carriers, and any and all service providers.
- Screening procedures must include elements for new customers, **beyond** financial soundness, such as business references, certifications, review of security policies and professional associations.
  - A written processes (flow chart, SOP, checklist) that is followed every time a new customer, supplier, importer, carrier, manufacture, etc is solicited for business.
  - Make it a priority of getting to know your customers and clients that you transport for.
  - Know your load broker or 3PL. Work with them to screen all loads and customers prior to being assigned to you as a carrier.



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# Business Partners

- Written procedures **must** exist for screening business partners, which identify specific factors or practices, that would trigger additional scrutiny by the highway carrier.
  - Does a business partner require more scrutiny than another?
  - What factors make a shipment more risky over another?

*Examples: Cash payment, unknown POC at company, odd or confusing route requests, won't complete security questionnaire, Not C-TPAT, etc.*

- What factors would steer you away from selecting a load or a shipment?



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# Business Partners

- Types of factors/entities that may require a higher degree of scrutiny in cases where the business partner.....
  - Has direct access to freight or equipment prior to loading
  - Uses a PO Box as their business address
  - Physical address is not consistent with their business operation
  - Operates with a cell phone only
  - Has no licenses, or certifications
  - Is new in business, no references
  - Provided unsatisfactory references
  - Has employees with a criminal, or unverifiable history
  - Has a poor financial status/No financial status
  - Has displayed transience in locations



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# Business Partners

- For those business partners who are C-TPAT (importers, ports, terminals, brokers, consolidators, etc.) the highway carrier **must** have documentation (e.g., C-TPAT certificate, SVI number, etc.) indicating whether these business partners are or are not C-TPAT certified.
  - SVI numbers
  - Periodically verify status of SVI in web portal
  - Documented verification of C-TPAT status



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# Business Partners

- Non-C-TPAT business partners should be subject to additional scrutiny by the highway carrier.
  - Full security questionnaire completed with more in depth information required regarding security process.
  - Written proof that they are meeting all C-TPAT minimum security criteria.

Examples: written statement, questionnaire completion, numerous site visits that are documented.

Create a contractual agreement that customers will adhere to specific security practices.



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# Business Partners

- C-TPAT highway carriers that subcontract transportation services to other highway carriers, **must** use other C-TPAT approved highway carriers or the subcontracted carrier needs to be under direct control of the certified C-TPAT carrier through a written contract.
- This means:
  - Owner Operators is not employed directly/exclusively for carrier.
  - Using own SCAC code/PAPS code
  - Listed on manifest or invoice as “dba as...”



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# Business Partners

- As highway carriers have the ultimate responsibility for all cargo loaded aboard their trailer or conveyance, they **must** communicate the importance of supply chain security and maintaining chain of custody as fundamental aspects to any company security policy.
  - Introductory letter to customers explaining commitment to C-TPAT and why supply chain security is important to your company.
  - Customers should be strongly encouraged to enroll in C-TPAT and otherwise expected to “harden” their security measures.



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# Conveyance Security

## Trailer Security

- For all trailers in the highway carrier's custody, trailer integrity **must** be maintained, to protect against the introduction of unauthorized material and/or persons.
- Highway carriers **must** have procedures in place to maintain the integrity of their trailers at all times.
- It is recognized that even though a carrier may not “exercise control” over the loading of trailers and the contents of the cargo, highway carriers **must** be vigilant to help ensure that the merchandise is legitimate and that there is no loading of contraband at the loading dock/manufacturing facility.
- The highway carrier **must** ensure that while in transit to the border, no loading of contraband has occurred, even in regards to unforeseen vehicle stops.



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# Conveyance Security

## Conveyance Inspection Procedures

- Drivers should be trained to inspect their conveyances for natural or hidden compartments.
  - A regular occurring security practice that is done each day, each trip, each shipment according to established procedures that are **VERIFIABLE and DOCUMENTED**.
  - Conveyance inspections **must** be systematic and should be completed upon entering and departing from the truck yard and at the last point of loading prior to reaching the U.S. border.
  - Training in conveyance searches should be adopted as part of the company's on-the-job training program **and** provide refresher training on a continual basis.



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# Conveyance Security

## Conveyance Inspection Procedures

- To counter internal conspiracies, supervisory personnel, should search the conveyance after the driver has conducted a search.
- These management searches should be random, **documented**, **based on risk**, and should be conducted at the truck yard and after the truck has been loaded and en route to the U.S. border if ever possible.
- The inspection logs should be reviewed by management for consistency and accuracy.



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**YOUR COMPANY NAME**

YOUR ADDRESS, CITY, PROVINCE POSTAL CODE

**C-TPAT CHECKLIST AND SEAL RECORD**

Date: \_\_\_\_\_ Time: \_\_\_\_\_  
am pm

Tractor - Tractor No. or Licence Plate No. \_\_\_\_\_

- Bumper / Tires / Rims
- Doors / Tool Compartments
- Battery Box
- Air Breather
- Fuel Tanks
- Interior Cab Compartments / Sleeper
- Faring / Roof

Trailer - Trailer No. or Licence Plate No. \_\_\_\_\_

- Fifth Wheel Area - check natural compartment / skid plate
- Exterior - front / sides
- Rear - bumper / doors
- Front Wall
- Left Side
- Right Side
- Floor
- Ceiling / Roof
- Inside / Outside Doors
- Outside / Undercarriage

Inspected by: \_\_\_\_\_  
Print Name Signature

Point of Loading: \_\_\_\_\_

Viewed Loading of Trailer:  Yes  No

Bill of Lading No.: \_\_\_\_\_

Bill of Lading Load and Piece Count Verified:  Yes  No

**Seal Record**

Seal No.: \_\_\_\_\_ Date Applied: \_\_\_\_\_ Time Applied: \_\_\_\_\_  
am pm

Applied By: \_\_\_\_\_  
Print Name Signature

Seal number and location matches that of bill of lading or shipping documents:  Yes  No

Seal(s) Intact:  Yes  No

**Seal Breakage In-Transit** (Immediately Notify Dispatch)

Reason for Seal Breakage: \_\_\_\_\_

Broken By: \_\_\_\_\_  
Print Name Signature

2nd Seal No.: \_\_\_\_\_ Date Applied: \_\_\_\_\_ Time Applied: \_\_\_\_\_  
am pm

Applied By: \_\_\_\_\_  
Print Name Signature

**IMMEDIATELY REPORT ANY DISCREPANCIES TO DISPATCH**

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# Conveyance Security Inspection Procedures

- The following systematic practices should be considered when conducting training for conveyance inspections.
  - Tractors: Bumper/tires/rims, Doors/tool compartments, Battery box, Air breather, Fuel tanks, Interior cab, compartments/sleeper, Faring/roof.
  - Trailers: Fifth wheel area - check natural compartment/skid plate, Exterior front/sides, Rear - bumper/doors, Front wall, Left side, Right side, Floor, Ceiling/Roof, Inside/outside doors, Outside/Undercarriage
- Additionally, include verifying the integrity of door locking mechanisms.



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# Conveyance Security

## Trailer Security

- Trailers/containers and tractors **must** be stored in a secure area to prevent unauthorized access and/or manipulation.
  - Owner operators working out of their residence **must** have secure storage for tractor and/or trailer
  - Drivers working for carriers that are allowed to take conveyances or trailers home **must** have secure storage and employer must have verified and approved of storage.
  - When parking loaded trailers for short periods such as lunch breaks, rest time, drivers should always select areas: that have high pedestrian or vehicle traffic nearby, are well lit and highly visible, and whenever possible, within sight of where the driver will be.
  - A documented or re-inspections should be occurring after stops and management should verify this.



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# Conveyance Security

## Trailer Seals

- The sealing of trailers, to include continuous seal integrity, are crucial elements of a secure supply chain, and remains a critical part of a carrier's commitment to C-TPAT.
- When transporting a container or trailer bound for the US, a high security seal that meets or exceed the current ISO PAS 17712 standards for high security seals **must** be utilized.



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# Conveyance Security

## Container Security-Seals

- Clearly defined written procedures **must** stipulate how seals in the highway carrier's possession are to be controlled during transit.
- These procedures **must** include **ALL** of the following:
  - 1) Verifying that the seal is intact, and if it exhibits evidence of tampering along the route.
  - 2) Properly documenting the original and **second** seal numbers.
  - 3) Verifying that the seal number and location of the seal is the same as stated by the shipper on the shipping documents.
  - 4) If the seal is removed in-transit to the border, even by government officials, a second seal must be placed on the trailer, and the seal change is documented.
  - 5) The driver must immediately notify the dispatcher that the seal was broken, by whom; and the number of the second seal that is placed on the trailer.



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# Conveyance Security Container Security-Seals

- These written seal procedures should be briefed to all drivers and there should be a mechanism to ensure that these procedures are understood and are being followed.

*EXAMPLE:* A signed SOP or contract with the drivers to ensure that this process is occurring.



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# Less-than Truck Load

- Carrier's **must** use a high security padlock or similarly appropriate locking device when picking up local freight in an international LTL environment.
  - The following are types of locking devices used for LTL loads, high security padlocks, high security seals, high security combination locks.
  - LTL carriers must ensure strict controls to limit the access to keys or combinations that can open these padlocks.
  - High security seal must be placed on at last pick up prior to crossing the border or when the freight leaves consolidation location.
  - Inspections should again be occurring at consolidation points or the last point prior to crossing the border.



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# Personnel Security

## Pre-Employment Verification

- Written and verifiable processes **must** be in place to screen prospective employees and to periodically check current employees.
- Application information, such as employment history and references **must** be verified prior to employment.
- Consistent with foreign, federal, state, and local regulations, background checks and investigations should be conducted for prospective employees.
  - drug/alcohol screening
  - criminal background-record check at local police
  - Driver record/CVOR/Abstract/driver certifications
  - financial check
  - identity verification



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# Personnel Security

- Once employed, periodic checks and reinvestigations should be performed and documented based on cause, and/or the sensitivity of the employee's position.
  - Promotion
  - Excess funds
  - Lifestyle change
- Companies must have procedures in place to remove identification, facility, and system access for terminated employees.



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# Physical Security

- Perimeter fencing should enclose the entire truck yard or terminal, especially areas where tractors, trailers and other rolling stock are parked or stored.
- All fencing **must** be regularly inspected for integrity and damage.
- Gates through which all vehicles and/or personnel enter or exit **must** be manned and/or monitored.
- The number of gates should be kept to the minimum necessary for proper access and safety.



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# Physical Security

- Private passenger vehicles must be prohibited from parking in close proximity to parking and storage areas for tractors, trailers and other rolling stock that crosses the international border.
- Alarm systems and video surveillance cameras should be utilized to monitor premises and prevent unauthorized access to vessels, cargo handling and storage areas, based on risk.



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# Security Training and Threat Awareness Program

- Employees must be made aware of the procedures the highway carrier has in place to address a situation and how to report it.
- A threat awareness program should be established and maintained by security personnel or management to recognize and foster awareness of the threat posed by drug smugglers and terrorists at each point in the supply chain.
- Additionally, specific training should be offered to assist employees in maintaining trailer and tractor integrity, recognizing internal conspiracies, and protecting access controls.



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# Security Training and Threat Awareness Program

- Drivers should be trained on how to inspect conveyances/trailers for natural or hidden compartments. (Owner operators should make an effort to receive such training – e.g. videos, attend training through local port, C-TPAT portal public document library, etc.).
- Specific training should be offered on how to conduct a 7-point/17-point conveyance/container security inspection. (Owner operators should make an effort to receive such training – e.g. videos, attend training through port/C-TPAT portal public document library, etc.).



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# Security Training and Threat Awareness Program

- Training should be conducted on how to perform manifest and other document reviews in order to identify and recognize suspicious cargo shipments.
- Physical access controls training should be provided to protect the company's facility, equipment, and documentation.



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# Security Training and Threat Awareness Program

- **Continuous** security related training should be provided (e.g. new employee orientation, annual refresher, workshops, etc.). (Owner operators should make an effort to continue to receive continuous training).
- Incentives should be offered for employees' active participation in the carrier's security program (Note: not necessarily monetary)



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# Information Technology Security

- IT security policies, procedures and standards **must** be in place.
- Automated systems **must** use individually assigned accounts.
- A periodic change of password is required.
- A system **must** be in place to identify the abuse of IT including improper access, tampering or the altering of business data,
  - Firewall
  - anti-virus software
  - anti-spy ware
  - software that tracks user access
  - software that assigns accountability for transactions
  - server in a secure room
  - back-ups are performed
  - back-ups are stored in a secure area



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# Information Technology Security

- All system violators must be subject to appropriate disciplinary actions for abuse.
  - Notified of discipline in employee handbook, email, contract, etc.



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*Thank You!!*



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