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Desk Officer  
Department of Homeland Security/TSA  
U.S. Office of Management and Budget  
VIA EMAIL to: oira\_submission@omb.eop.gov

**Re: Transportation Security Administration's 30-Day Notice: Revision of Agency Information Collection Activity Under OMB Review: Transportation Worker Identification Credential (TWIC®) Program; 82 Fed. Reg. 14521; Docket No. TSA-2006-24191**

To Whom It May Concern:

The American Fuel & Petrochemical Manufacturers (AFPM) is pleased to provide the following comments in response to the Transportation Security Administration's (TSA) March 21, 2017 Notice of Revision of Agency Information Collection Activity Under OMB Review (ICR) for the Transportation Worker Identification Credential (TWIC). AFPM strongly supports the aspect of TSA's proposal that would leverage the TWIC background checks for use in other federal security programs.

AFPM is a national trade association representing nearly 400 companies that encompass virtually all U.S. refining and petrochemical manufacturing capacity. Many AFPM member sites are subject to the Maritime Transportation and Security Act (MTSA) and are therefore impacted by revisions to the TWIC program's requirements.

The proposed revision to the TWIC program eliminates obsolete information, adjusts fees, and accommodates a policy to allow background screening performed under TWIC to satisfy background check requirements for other federal security vetting programs. AFPM supports the proposed revision to ICR because it would eliminate unnecessary duplication across federal programs that require security vetting of individuals.

AFPM member terminals act as hubs for the storage and transfer of bulk liquids across various modes of transportation. Many of the liquids stored and transferred are subject to the U.S. Coast Guard's MTSA regulations, the Department of Transportation's (DOT) Hazardous Materials regulations, and/or the Department of Homeland Security's Chemical Facility Anti-Terrorism Standards (CFATS). As the operators of sites serviced by multiple modes of transportation, our members' employees, contractors, and the third-party personnel that transport regulated materials must undergo multiple background checks under these federal security programs. As described in the *Federal Register*, the data collected in connection with TWIC enrollments could be used to support additional eligibility determinations under other federal

security programs. For example, individuals in the field of transportation who are authorized to apply for a TWIC would no longer have to undergo duplicative background checks in connection with other government security programs, such as the CFATS program, TSA's expedited screening program for air travel, TSA Precheck, and hazardous materials endorsements to commercial driver's licenses. AFPM has long advocated that workers at CFATS sites could meet the definition of transportation worker and should be allowed to use the TWIC. Leveraging the security threat assessment background checks across multiple security programs will reduce the time and cost of meeting these vetting needs and conserve scarce government resources.

AFPM welcomes TSA's leveraging the TWIC background vetting to benefit other government programs. In connection with this proposed expansion, OMB should consider the following recommendations to help reduce the costs of the TWIC program:

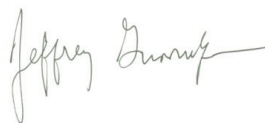
On arrival at the University Enrollment Services Center (UES), a TWIC applicant could pay an additional \$10 or so for each government credential program they choose (a la carte-style). For example, an applicant could choose TWIC (\$125.25) and add a DOT HazMat Endorsement (\$10), and maybe TSA Pre-Check (\$10) for a total fee of \$145.25. Multiple endorsements could be included on a single credential, have harmonized expiration dates, and be useful for multiple M TSA, CFATS, or other facilities or vessel operation locations.

Other benefits of the above approach include:

1. The *a la carte* option could help offset government costs associated with evaluating the background check results and manufacturing the security credentials;
2. One-time trips to UES centers to make applications for multiple program enrollments will save time and money, and have the added benefit of simplifying tracking credential expirations; and
3. Harmonization for the initial background (and any recurring) vetting for all programs.

AFPM commends TSA's action to allow background screenings conducted for a TWIC to be used for other federal vetting programs and urges OMB to approve this action. Thank you for your consideration of these comments. Should you have any questions, please contact me at [jgunnulfson@afpm.org](mailto:jgunnulfson@afpm.org) or at 202-552-4371.

Sincerely,



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