

~~SENSITIVE SECURITY INFORMATION~~

Program Compliance Assessment (PCA)

Checklist Rules and Analysis

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#	Topic	Form Question	Reference(s)	YES	NO
General Duties					
1	Civil Liberties	BDO conducts BD must be conducted without regard to race/ethnicity, color, gender/sex, gender identity, religion, national origin, sexual orientation, or disability.	2.1.D	BDO should conduct BD without using bias and should not use any language that would elude to the belief that individual bias is being used.	Evidence of referring or singling out a specific demographic will be immediately reported to BDA Program Management for further investigation.
2	Reporting Events	(b)(3):49 U.S.C. § 114(r)	5.1.B	BDO ensures that all significant events occurring throughout shifts are accurately reported to the BDA TSM or SBDO on duty immediately.	BDO neglects to report significant events to the BDA TSM or SBDO on duty immediately. BDO waits to tell BDA TSM or SBDO or doesn't inform BDA TSM or SBDO.

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		(b)(3);49 U.S.C. § 114(r)			
3	Activity Log	BDOs and BDA TSMs must maintains a daily log of activities in a BDA-designated notebook including, but not limited to, movements from one location to another and start and stop times associated with each location.	5.2.C	BDO and BDA TSM maintains physical control of BDA issued notebook and logs daily activity as required throughout the duty day. BDO may utilize locally derived tool but must transfer information into their notebook.	BDO and BDA TSM does not maintain physical control of BDA issued notebook and/or does not log daily activity as required throughout the duty day. BDO does not transfer needed information into notebook. PCA officer must have the opportunity to observe.
4	Cell Phone	At minimum, a TSA-issued cell phone or working radio per team.	3.2.B.1	At a minimum, one BDO team member has a TSA issued cell phone and/or radio at screening locations.	Not one BDO team member has a TSA issued cell phone and /or radio at screening locations. Personal cell phones do not substitute this requirement.
5	Notebook	A writing instrument and a BDA-designated notebook as described in Section 5.2.	3.2.B.2	BDO physically possess a functioning writing instrument and a notebook capable of logging required daily activities.	BDO does not physically possess a functioning writing instrument and a notebook capable of logging required daily activities.
6	Playbook Knowledge	BDO has a working knowledge of Playbook activities	Playbook SOP 2.5.C.2	AS required by the Playbook SOP Section 2.5.C.2., BDOs must have knowledge of the Playbook program to perform their duties.	BDOs must demonstrate the ability to articulate knowledge of Playbook activities and communicate the responsibility of BDO involvement during operational deployment as well as correctly identify plays being conducted.

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#	Topic	Form Items	Reference(s)	YES	NO
Managerial Duties (BDA TSM Only)					
7	Proficiency (BDA TSM ONLY)	All BDA TSMs must maintain their proficiency by assessing behavior and appearance indicators, conducting ACTIVE ENGAGEMENT (AE) and RESOLUTION CONVERSATION (RC) (as applicable) for at least 8 cumulative hours every 14 days.	2.2.D	BDA TSM maintains BD proficiency and documents hours executing BD functions. BDA TSM is actively working on the floor in behavior observation, WTL, and referral screening.	BDA TSM is unable to perform BD functions at minimum of 8 hours within a 14 day time frame. BDA TSM presents no documentation of BD activity. BDA TSM does not participate in BD functions that are applicable.
8	Mentor BDOS (BDA TSM ONLY)	The BDA TSM must perform mentoring activities with BDOs for a minimum of 8 cumulative hours every 14 days.	2.3.B	BDA TSM guides and mentors BDOs for a minimum of 8 hours a pay period. BDA TSM is helping BDO in application of their duties. BDA TSM is documenting hours of completion.	BDA TSM is unable to guide or mentor BDOs a minimum of 8 hours within a 14 day time frame. BDA TSM does not mentor during their designated time. BDA TSM is not documenting hours and there is no way to determine if hours are met.
9	Report to and Assist BDA Coordinator (BDA TSM and SBDO ONLY)	BDA TSMs must report directly to the BDA Coordinator on all matters related to the BDA Program. The BDA Coordinator and TSMs must meet at least once per week to review	2.3.A.1 and 2.3.A.2	BDA TSM should communicate with the BDA Coordinator at a minimum of once per week. Communication should include all BD related activities and any issues related to	BDA TSM does not meet with BDA Coordinator and/or does not provide the BDA Coordinator with weekly reports. Lead BDA TSM does not gather information from all BDA TSMs to share with BDA Coordinator.

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		any BDA activities and issues related to personnel, data collection, incident reporting, and certification status.		personnel, data collection, incident reporting, and BDO certification status. The BDA TSM collectively could gather information as a group, but lead BDA TSM is the one who meets with the BDA Coordinator.	
10	BD Certified Designee (BDA TSM and SBDO ONLY)	The BDA TSM or SBDO must assign an LBDO to assume operational oversight whenever a BDA TSM or SBDO is not on duty. Another BD-certified designee may assume operational oversight if an LBDO is unavailable.	2.3.D	BDA TSM or SBDO should assign a LBDO or BD certified designee to assume the responsibilities when a BDA TSM or SBDO is unable to be on duty. BDA TSM or SBDO should assign a designee at the airport(s) to oversee the BDA program in their absence when BD screening is being conducted. This designee should be communicated to the BDO team.	In the absence of a BDA TSM there is no designee identified/scheduled. The BDA TSM or SBDO does not communicate who is assuming the role of designee.

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11	Supervise for Program Compliance (BDA TSM and SBDO Only)	All BDA leadership holds the responsibility of addressing performance and disciplinary issues as they arise in their designated capacity. Ignoring these issues often has a negative impact on the rest of the team. Accountability is critical to success. SBDO breaks and lunches should be assigned in a manner that maximizes supervisory floor coverage and ensures accountability and program compliance.	BDA Program Handbook 1.2.E and 4.1.F	BDA TSM or SBDO is actively engaging BDOs during operational deployment and verifying DHS policy requirements to protect the civil rights and liberties of individuals.	BDA TSM or SBDO has not been present during BD operations for an extended period of time. BDA TSM or SBDO engagement is not mission oriented and deficiencies are ignored.
12	Deploy BDOs (BDA TSM or SBDO ONLY)	The BDA TSM or SBDO must use local intelligence and knowledge to deploy teams where risk is elevated and the amount of individuals screened by BD is maximized.	2.3.F.3	BDA TSM or SBDO deploys BDO resources throughout the screening operation to ensure a risk based methodology to mitigate vulnerabilities. BDA TSM or SBDO clearly articulates methodology of assigning teams for the operational deployment of BD.	BDA TSM or SBDO has no rationale in creating duty assignments, obvious vulnerabilities have been created, and operational security has been compromised.

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13	Shift Briefings (BDA TSM and SBDO ONLY)	The BDA TSM or SBDO must Hold daily briefings to discuss all shift events and disseminate any announcements to include intelligence updates. Direct BDOs to attend checkpoint screening briefings when the BDA workload permits.	2.3.F.1 and 2.3.F.2	BDA TSM or SBDO is present for In/Out briefings. BDA TSM or SBDO discusses all shift events and disseminates any announcements, including intelligence updates.	In/Out briefs are disorganized and prove to be operationally ineffective. BDA TSM or SBDO is not present during In/Out briefs and leaves no guidance or designee.
14	Ensures TSOC Notification (BDA TSM ONLY)	All BDO LEO notifications must be reported to the TSOC as described in OD-400-18-2 series, via telephone at 1-866-655-7023 (for callers within the United States, Puerto Rico, and Canada) or 1-703-563-3240 (for international callers) and in writing to the TSOC	5.1.B and 5.5.A.2	BDA TSM accurately identifies situations requiring TSOC reporting. BDA TSM makes or verifies notifications were made to TSOC.	BDA TSM is unaware of situations requiring TSOC notification. BDA TSM does not accurately identify situations requiring TSOC notifications. BDA TSM does not call or verify notification was made to TSOC.

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15	Report Significant Incidents to HQ (BDA TSM ONLY)	BDA TSM or designee must send a copy of all reports to BDA.mailbox@tsa.dhs.gov with the subject line, "TSOC Reporting (insert airport code here)."	5.5.A.2	BDA TSM is aware of suspicious incidents and sends to HQ for situational awareness.	BDA TSM is aware of suspicious incident and does not send to HQ for situational review.
16	Review Referral Reports (BDA TSM ONLY)	BDA TSM or designee must confirm that All completed BDA Referral Reports are collected and reviewed for completeness and accuracy at the end of each shift, and ensure that no SPII is recorded.	5.5.A.3	BDA TSM or designees should ensure that all BDA referrals are completed correctly and entered into the BD database at the end of each shift or no later than 24 hours. If this duty is delegated, BDA TSM should oversee that the process is being completed correctly.	BDA TSM is unaware of completed BDA Referral Reports and 24hrs elapse prior to review. BDA TSM fails to mentor BDOs when corrections are made. Designee is without guidance.
17	Promote Referral Reports (BDA TSM ONLY)	BDA TSM or designee must confirm that PMIS entries have been promoted as soon as possible, but no later than 24 hours after the time of entry.	2.4.F.1	BDA TSM ensures that all BDA Referral Reports are accurately entered and promoted into PMIS. If this duty is delegated, BDA TSM should oversee that the process is being conducted correctly.	BDA TSM is unaware of entries made into PMIS resulting in the unsuccessful promotion of BDA Referral Reports. Designee is without guidance.

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18	Review Incident Reports and Enter Into PARIS and TISS (BDA TSM ONLY)	BDA TSMs must ensure Incident Reports are completed and entered into PARIS and TISS and that the security basis for all actions taken by TSA personnel is thoroughly documented in the report. BDA TSMs must ensure that all LEO notifications during BD are checked as a SAR candidate in the PARIS database. Ensure all LEO notifications are reported as soon as possible, but no later than 24 hours after the incident by e-mail to the BDA HQ Program Office at BDA.mailbox@tsa.dhs.gov. Also notify the airport assigned field counsel through the BDA Coordinator, as directed by the FSD.	5.5.B.2 and 5.5.B.3	BDA TSM reviews all Incident Reports for completeness and accuracy. BDA TSM ensures the Incident Reports thoroughly explain the security-based reason for LEO notification. If this duty is delegated, BDA TSM should oversee that the process is being completed correctly. BDA TSM ensures required data is entered into PARIS and TISS on a daily basis. If this duty is delegated, BDA TSM should oversee that the process is being completed correctly.	BDA TSM is unaware of completed Incident Reports and 24hrs elapse prior to review. BDA TSM does not mentor BDOs when corrections are made. PARIS and TISS entries are not completed on a daily basis. BDA TSM is unaware of completed Incident Reports and 24hrs elapse prior to entry. Designee is without guidance.
19	Shift Summary (BDA TSM ONLY)	Ensure that all daily shift summary information is completed and entered into the BEAM database by the end of each	5.5.C	BDA TSM should have a tracking mechanism that maintains a shift summary listing the daily activities of the	Tracking mechanism for recording daily BDO activities does not exist. There is no record of BDO activities that occurred during the day.

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		operational day. For airports where BEAM is not in use, daily shift summaries must include, at a minimum, the BDOs on duty and their daily activities such as BD assignment areas, Playbook activities, and/or any additional special events or activities.		BDOs, checkpoint locations, and terminals. This should be done through the BEAM database. For those airports that do not operate on BEAM, a hard copies should be retained.	
20	Report Complaints to BDA HQ (BDA TSM ONLY)	Whenever an individual expresses an interest in filing a complaint against BDA personnel or the BD process based on allegations of profiling, discrimination, or civil liberties violations, a BDA TSM must ensure that the individual is provided information on how to file a complaint with the Office of Civil Rights & Liberties, Ombudsman, and Traveler Engagement's Multicultural Branch.	2.1.J	BDA TSM should report any expressed interest in filing a complaint and any other incidents that would positively or negatively impact the BDA program.	BDA TSM is aware that an individual expresses an interest in filing a complaint against a BDO or the BDA process and neglects to notify the BDA Program Office.
21	SSI Protection (BDA TSM ONLY)	BDA TSM Secure all reports, logs, and forms	5.5.D	BDA TSM should ensure that all documents are	BDA TSM has not developed a system for securely

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		using SSI protocols.		secured in a manner required for the protection of SSI. If this duty is delegated, BDA TSM should oversee that the process is being conducted correctly BDA TSM should ensure that all notebooks are secured in a manner required for the protection of SSI. If this duty is delegated, BDA TSM should oversee that the process is being conducted correctly.	safeguarding SSI material. Designee is without guidance BDA TSM has not developed a system for securely safeguarding SSI material. Designee is without guidance.
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#	Topic	Form Items	Reference(s)	YES	NO
Behavior Observation					
22	Partner	(b)(3):49 U.S.C. § 114(r)	3.2.A and 3.5.C	(b)(3):49 U.S.C. § 114(r)	
23	Checkpoint Check-in		3.2.C		
24	Initial Strategy		3.2.D		

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		(b)(3);49 U.S.C. § 114(r)		(b)(3);49 U.S.C. § 114(r)
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		(b)(3):49 U.S.C. § 114(r)		(b)(3):49 U.S.C. § 114(r)
25	Positioning		3.2.E and 3.5.G	
26	Rotate with Partner		3.2.D	

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		(b)(3);49 U.S.C. § 114(r)			
27	Establish Environmental Baseline		3.3.A	(b)(3);49 U.S.C. § 114(r)	

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28	Environmental Baseline Changes	(b)(3):49 U.S.C. § 114(r)	3.3.B and 3.3.C	(b)(3):49 U.S.C. § 114(r)
29	Environmental Baseline Deviations		3.4.A	

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30	Point Values	(b)(3);49 U.S.C. § 114(r)	3.4.A	(b)(3);49 U.S.C. § 114(r)
31	(b)(3);49 U.S.C. § 114(r)		3.4.B.1 and 3.5.F	

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32	Refer To Another BDO(s)	(b)(3):49 U.S.C. § 114(r)	3.4.B	(b)(3):49 U.S.C. § 114(r)
33	(b)(3):49 U.S.C. § 114(r)			
37				

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Active Engagement					
34	Brief Verbal Engagements	(b)(3);49 U.S.C. § 114(r)	3.5.A	(b)(3);49 U.S.C. § 114(r)	
35	Engaging Displayed Behaviors		3.5.A		

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		(b)(3);49 U.S.C. § 114(r)			
36	AE Demeanor	(b)(3);49 U.S.C. § 114(r)	3.5.H.1 and 3.5.H.2	(b)(3);49 U.S.C. § 114(r)	
37	Improperly Resolving Behaviors		3.5.H.3		

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38	Physical Search	(b)(3);49 U.S.C. § 114(r)	3.5.H.4 and 3.5.H.5	(b)(3);49 U.S.C. § 114(r)
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Referral Screening					
39	BDR Threshold	(b)(3):49 U.S.C. § 114(r)	3.6.A	(b)(3):49 U.S.C. § 114(r)	
40	Notify WTMD/AIT TSO		3.6.D		
41	Appropriate Pat Down		3.6.1.B and 3.6.F.3		

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(b)(3):49 U.S.C. § 114(r)

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		(b)(3):49 U.S.C. § 114(r)		(b)(3):49 U.S.C. § 114(r)
42	Review ID and Travel Documents		3.6.2.A	
43	X-Ray and Liquid Screening		3.6.3.A.1	

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	(b)(3);49 U.S.C. § 114(r)		(b)(3);49 U.S.C. § 114(r)
44		3.6.3.A.1.a and 3.6.3.A.2.a	

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(b)(3):49 U.S.C. § 114(r)

(b)(3):49 U.S.C. § 114(r)

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3.6.3.A.1.b and
3.6.3.A.1.c

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		(b)(3);49 U.S.C. § 114(r)			
46	Resolution Conversation		3.6.4.A	(b)(3);49 U.S.C. § 114(r)	
47	Continue Observation During Resolution Conversation		3.6.4.C		
58	Resolution Conversation Demeanor		3.6.4.E.1		

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49	(b)(3);49 U.S.C. § 114(r)	3.6.4.G	(b)(3);49 U.S.C. § 114(r)
50		3.6.4.H.2	
51	Complete Screening	(b)(3);49 U.S.C. § 114(r)	3.6.4.I

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~~SENSITIVE SECURITY INFORMATION~~

		(b)(3):49 U.S.C. § 114(r)			
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#	Topic	Form Items	Reference(s)	YES	NO
LEO Referral Screening					
52	LEO Threshold	(b)(3);49 U.S.C. § 114(r)	3.6.I	(b)(3);49 U.S.C. § 114(r)	
53	Identifies LEO Situations		3.6.4.E.2 and 3.7.B		

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~~SENSITIVE SECURITY INFORMATION~~

		(b)(3), 49 U.S.C. § 114(r)			
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		(b)(3):49 U.S.C. § 114(r)			
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(b)(3); 49 U.S.C. § 114(r)

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		(b)(3):49 U.S.C. § 114(r)		(b)(3):49 U.S.C. § 114(r)
54	Notifications of LEO Referral		3.7.C.1	

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		(b)(3);49 U.S.C. § 114(r)			
55	Communicate Context to LEO	(b)(3);49 U.S.C. § 114(r)	3.7.D.1	(b)(3);49 U.S.C. § 114(r)	

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		(b)(3);49 U.S.C. § 114(r)			
56	Documentation		3.7.E	(b)(3);49 U.S.C. § 114(r)	
57	FSD/Designee Authorization		3.7.F.3		

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(b)(3)-49 U.S.C. § 114(r)

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~~SENSITIVE SECURITY INFORMATION~~

#	Topic	Form Items	Reference(s)	YES	NO
Reporting Requirements					
58	Describe Environmental Baseline	(b)(3);49 U.S.C. § 114(r)	3.3.D	(b)(3);49 U.S.C. § 114(r)	

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59	Record Referral Information	(b)(3):49 U.S.C. § 114(r)	5.2.B	(b)(3):49 U.S.C. § 114(r)
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		(b)(3);49 U.S.C. § 114(r)	(b)(3);49 U.S.C. § 114(r)
60	BDA Referral Reports Complete Within 24 Hours		5.3.J
61	SPII	Sensitive Personally Identifiable Information (SPII) of individuals selected for BDR SCREENING, LEOs, or other non-TSA personnel must not be recorded on or attached to any BDA Referral Report, or entered into PMIS.	5.3.E
62	Incident Reports Submitted within 24 Hours	(b)(3);49 U.S.C. § 114(r)	5.4.B and 5.4.F

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		(b)(3);49 U.S.C. § 114(r)			
63	Reports During Slow Periods		5.3.I	(b)(3);49 U.S.C. § 114(r)	

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