Subject/Title: **Access Control Policy**	**Procedure No:** **CATS S&S11**
Previous Revision: **March 29, 2019**	**Revised Date:** **June 17, 2022**

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1.0 PURPOSE

Charlotte Area Transit System (CATS) has many areas within its property that are considered "Secure" areas or "Security Sensitive" areas. For this reason, a procedure must be in place to ensure those areas are protected against unlawful or unauthorized entry by those interested in doing damage to CATS systems.

2.0 SCOPE

This policy applies to all CATS employees, City employees, contractors, vendors, and others who need access to CATS' Secure and Security Sensitive areas.

This policy does not include the Charlotte Mecklenburg Government Center (CMGC). The CMGC is a public building with public access from 7:00 am until 6:00 pm Monday- Friday. Badge access is controlled through Engineering and Property Management (E&PM) Building Services. Employees with offices in the CMGC should see their supervisor to request additional badge access.

Keys specific to some cabinets and equipment such as Light Rail Vehicle (LRV) keys, farebox keys, and lockout/tagout keys are not controlled by Safety and Security and fall outside the scope of this procedure.

3.0 POLICY

It is CATS' policy to control access to CATS facilities and restricted areas and to also control when those areas may be accessed (e.g., certain days of the week or shifts).

CATS will grant access based on the needs and restrictions of CATS operations and support functions.

Basic principles of CATS access management include:

- Limiting the number of access points
- Identifying and dedicating secure areas
- Providing transition areas between secure and non-secure areas
- Minimizing interference with the movement of employees, contractors, etc.
- Not interfering with fire protection and life safety systems
- Conforming to Americans with Disabilities Act (ADA) requirements

- Layering of security systems
- Using protective measures to address all threat phases: deterrence, detection, defense, mitigation, response, and recovery
- Providing an audit trail and/or transaction reporting capability

4.0 REFERENCES

CATS ET02 *Electronic Technology Access and Security*
CATS S&S09 *TVM Key Management*
CATS REV103 *Treasury Room Access and Security Procedures*
City Policy HR19 *Pre-Employment Background Checks*
CATS System Security Plan (SSP)

5.0 DEFINITIONS

Access Control means a data security process that enables organizations to manage who is authorized to access secure areas at CATS.

Contractor means a person who works on an "as needed" basis for a stipulated amount of money by the City of Charlotte.

Employee means a person is a City of Charlotte personnel hired to work for CATS.

Escort means a CATS employee is accompanying another person who does not have access to the security sensitive area.

Secure Access means access is granted to CATS employees, contractors, and others after they are credentialed and approved by CATS Security.

Secure Areas are those areas that require badge access or key access.

Security Breach means unauthorized person gaining access inside a secure or security sensitive area.

Security Sensitive Areas are secure areas that contain or allow access to equipment or systems that could intentionally or inadvertently be used to compromise CATS systems or pose a threat to CATS riders or employees. People who do not have badge/key access to Security Sensitive areas must be escorted while they are in a Security Sensitive area.

Security Sensitive Positions include Safety and Security Staff, Technology Staff, Rail Operators, Chief Rail Controller, Rail Controllers, Railcar Mechanics and Technicians, Rail Maintenance of Way, Facilities Supervisors, and employees or contractors that require access to control centers, communication houses, Sensitive Security information/records, and/or power substations or are involved in the installation of train control systems. (Definition from CATS' System Security Plan (SSP) Section 5.4 *Security Responsibilities of CATS Divisions, Employees, and Contractors*).

Technology Secure Facilities contain electronic technology components such as network switches, servers, firewalls, cross-connect blocks, SCADA equipment, and/or

similar types of electronic technology equipment which must be restricted to personnel authorized by the Chief Transit Technology Officer (CTTO) and who have a demonstrated need and have been appropriately credentialed. Authorized visitors, users, and vendor service personnel must have their access recorded and either be appropriately approved or be escorted. Entrances must be controlled and monitored. (Definition taken from CATS' Electronic Technology Access and Security Policy, CATS ET02).

Tenant means a person who occupies land or property rented from CATS.

Vendor means an individual or company offering something for sale.

6.0 RESPONSIBILITY

All employees are responsible to be watchful when they access secure areas and not allow unauthorized individuals to enter with them when they scan their badge or enter with a key. Employees are to notify the Security Officer or Transit Security Manager immediately if their badge or key is lost or stolen.

The Office of Safety and Security will control access of badges and manage key distribution/return and keep records of every individual issued a CATS access ID/badge and key.

Division/Section Managers (Managers) are to clarify and enforce administration of CATS Access ID/Badge procedures to limit exposure to security threats related to lost, stolen and/or mishandled badges and documentation.

Specifically, Managers are required to:

- request the access needed for their new employees
- maintain up-to-date access information for their employees through CATS Security.
- sign badge request forms for employee replacement of lost badges;
- notify S&S immediately when a badge needs to be deactivated (in person or via telephone),
- provide updated employment status information upon change in employee assignments that affect access permissions,

Escorts are to assure those that are being escorted are authorized, accounted for and only doing businesses for which they are being escorted. An escort must assure that the individual is authorized prior to entering any CATS Secure area or Security Sensitive area.

7.0 PROCEDURE

7.1 Access for CATS Employees

The Office of Safety and Security issues every employee a photo identification badge, which allows each individual access to CATS facilities as required by their job function. When an employee is hired, the Office of Safety and Security will assign standard permissions based on the roles and responsibilities. When in an area that requires access using an identification badge, the individual must display the badge at all times at or above the waist on the outermost garment. The Office of Safety and Security only changes access for individuals with written approval from the division/section manager.

All key distributions are by job functions and requirements. Each key is serialized with a unique number and assigned to an individual. Each and every door key is tracked by issuance and recipient's acknowledgment signature. The keys are further tracked in an Excel spreadsheet by individual information, e.g. name; facility location, department, section, door; core pinning/construction, key cut by description, key assignment, key return, and receipt documentation. When in an area that requires access using a security key, the individual must display his/her badge at all times. (From CATS SSP Section 3.4.4 Key/Lock Management)

The named employee/contractor has a need for the key being requested using form Hard Issuance Request Form S&SF20A. Once the key is requested, the Division/Section accepts responsibility for any key associated costs if too many Schlage keys are lost or not returned to the Office of Safety & Security. Costs may include replacement keys and/or the cost of the locks being replaced or re-keyed and shall be determined by the Office of Safety & Security.

The CATS employee will be held responsible for any key that is lost by a contractor whom he/she signed for and may be subject to discipline and any replacement cost accrued due to the loss of the key. The cost of lost and/or broken Schlage keys will be charged to the employee who signs for the key on the Hard Key Issuance Receipt S&SF19.

Tenants are made aware that there is an initial cost for cores and keys for their leased location. When signing for the leased location, the tenant who signs for the key on the Hard Key Issuance Receipt S&SF20B is made aware that they are responsible for the cost of any replacement keys that are lost or broken due to negligence, or not returned to CATS Safety & Security at the end of their lease. This may include the cost of cores and keys.

The result of a lost or damaged identification card or hard key issued by the Office of Safety and Security could lead to a security breach. It is important that all employees, contractors, tenants, and vendors report lost or stolen identification cards or hard keys and understand that it is their responsibility to contact the Office of Safety and Security for replacements. Any confirmed breach as a result of a lost ID card or hard key will result in immediate key and core replacement at the cost of the department, contractor or tenant.

7.2 Areas Open to the Public

Areas that are open to the public do not require an access badge or specific permissions to enter. (Example: Rail platforms) However, work that requires access to a communication cabinet located on a rail platform requires key access and, in some cases, would require an escort.

Some areas are open to the public during business hours but closed to the public during non-business hours and weekends. (Example: the South Tryon Bus Facility entrance) After 7:00 pm and until 7:00 am, only people with badge access may access the building.

7.3 Secure Areas

The Office of Safety and Security will provide individual CATS badges with access based on job classification. Additional access for an individual beyond the standard access is allowed only upon approval from the Manger with concurrence by CATS Security. Individuals who do not have badge/key access to a secured area must be escorted as required.

Use of a buzzer and intercom is permitted for access to gates and main entrances and other designated areas.

Contractor badges are available for each department to check out to a contractor for the day. Each area will document check-in and check-out of badges on Contractor Badge Sign Out Sheets (form S&SF34). Contractor badges must be returned by the end of the business day.

Visitor badges are available at SBLRF Admin, SBLRF Dispatch, and South Tryon Bus Facility Admin and Dispatch, BOD Dispatch and STS Dispatch at N Davidson for visitors to check out. Each area will document check-in and check-out of badges on Visitor Badge Sign Out Sheets (form S&SF37). Visitors' badges must be returned by the end of the business day. Visitors must surrender their driver's license in exchange for the visitor badge to ensure the badge is returned.

Anyone entering the Treasury Room must meet additional requirements in CATS REV103 *Treasury Room Access and Security Procedures*. When any type of maintenance is required in the Treasury Room after hours, the Officer of Safety and Security will be notified as to who will be entering and who will be escorting. Company Police assigned to Revenue will be given access to the Revenue Room. Any work in the Treasury Room will require a police escort.

When any vehicle that is not CATS issued vehicle enters any CATS property or facility, they must have placards that state the company name on the driver and front passenger door. Letters on the placards must be at least 3 inches in height. Placards must be displayed at all times while at CATS Facilities or on CATS property.

7.4 Security Sensitive Areas

The following areas are security sensitive areas:

- Power Substations along the light rail alignment, communication houses, and switch stations – Only employees assigned to these areas will be given access by virtue of their job position. Contractors needing access to these areas must be escorted at all times by an authorized CATS employee.
- The Rail Operations Control Center (ROCC) and Bus Operations Control Center (BOCC) – Badge access is restricted to only those assigned to that area. All others needing access will be escorted by an authorized employee with badge access.
- LRV Cabs – LRV keys are not issued by Safety and Security and fall outside this policy.
- CATS and/or City of Charlotte network infrastructure (All rooms/areas containing electronic technology components, network switches, servers, firewalls, cross-connect blocks, SCADA equipment, and/or similar types of electronic technology equipment) – The CTTO will determine access to CATS and/or City of Charlotte network infrastructure as described in CATS ET02 *Electronic Technology Access and Security*.

7.5 Background Checks for City Employees per City Policy HR19

Criminal background checks are required on final internal or external candidates applying for positions with the City of Charlotte, including interns and temporary contract employees. Candidates for employment where the job duties include responsibility for initiating or affecting financial transactions or related duties are subject to credit history checks. Results of background checks cannot be used as a basis for denying employment unless the denial of employment is determined to be due to job-related issues or business necessity.

7.6 Background Checks for Contractors per CATS' SSP and Contract General Conditions

CATS reserves the right to require a Contractor to conduct background checks on the Contractor's employees and to remove from CATS property any employee CATS considers a security risk or safety hazard. The contractor must have appropriate documentation, as determined by the CATS Representative, to gain access to CATS property.

The CATS representative will advise the contractor in writing of the necessary documentation and identification required to gain access to CATS property.

Contractor badges with picture ID may be issued, provided the Contracting Company has complied with the individual background investigation requirements.

7.7 Facilities Access for Maintenance

CATS Facilities Staff (including assigned E&PM Building Services) needs access to all areas it is charged to maintain, regardless of who is using the area, with the exception of single use security areas. This includes all office areas and work areas.

If Facilities staff is not granted badge/key access to an area, it is the responsibility of that division to have someone available to escort Facilities and/or contractors when scheduled and unscheduled maintenance and repairs are required. The area manager should coordinate a time to provide an escort to the Facilities representative and/or contractor.

7.8 Changes in Access

Employees may request a change of access to their manager if they find that they are restricted from accessing an area where they need to perform work. Employees may request access through the area manager by e-mail or by using form S&SF33 Badge Access Request Form. Employees may request keys using the Hard Key Issuance Request form (form S&SF20A).

The Office of Safety and Security will notify employees of changes to their badge/key access.

To add access to security sensitive areas for maintenance purposes, etc., the Office of Safety and Security requests to be given at least 24 hours' notice.

All badges and keys issued by the Office of Safety and Security, are property of CATS and must be returned upon separation from employment (for any reason), when job function no longer requires a CATS issued badge, and/or upon request from the Office of Safety and Security.

If a badge or key is lost, please contact the Security Officer or Transit Security Manager immediately.

Effective 6/30/2019, employee badges will be updated every 4 years. Any badges that have not been updated/issued within the last 4 years will be deactivated by CATS security.

8.0 REGULAR AUDIT OF LOGS AND KEYS

The Security Manager and Security Officer will conduct an annual audit of the keys and the log maintained by the Security Officer. A more extensive audit will be conducted by the Security Manager and Quality Assurance at least every three years as part of the three-year review of this procedure. The audit is to ensure adequate controls are maintained on keys and badge access.

CATS employees who are the authorized signer of a contractor key requests must confirm status of contractor issued keys every 30 days.

9.0 RECORDS REQUIRED

The Office of Safety and Security maintains records of all requests and authorizations for access in a binder. The Office of Safety & Security maintains the Key Log in an excel spreadsheet and badge access is controlled in the Access Control System.

Authorization may be captured on the referenced forms or by e-mail from the area manager.

10.0 FORMS

Hard Key Issuance Receipt Form (S&SF19)
Hard Key Issuance Request Form for Employee Contractor (S&SF20A)
Hard Key Issuance Request Form for Tenants (S&SF20B)
Access / ID Badge Request Form (S&SF33)
Contractor Badge Sign Out Sheets (S&SF34)
Visitor Badge Sign Out Sheets (S&SF37)

Summary of Changes

Entire Document: Minor changes to improve clarity.

2.0 Scope: Removed reference to procedures CATS S&S09 and CATS REV103.

5.0 Add Definitions for Access Control, Contractor, Employee, Escort, Security Breach, Tenant, and Vendor

7.1 Added: The named employee/contractor has a need for the key being request using form Hard Issuance Request Form S&SF20A. Once the key is requested, the Division/Section accepts responsibility for any key associated costs if too many Schlage keys are lost or not returned to the Office of Safety & Security. Costs may include replacement keys and/or the cost of the locks being replaced or re-keyed and shall be determined by the Office of Safety & Security.

Added: The cost of lost and/or broken Schlage keys will be charged to the employee who signs for the key on the Hard Key Issuance Receipt S&SF19.

Added: Tenants are made aware that there is an initial cost for cores and keys for their leased location. When signing for the leased location, the tenant who signs for the key on the Hard Key Issuance Receipt S&SF20B is made aware that they are responsible for the cost of any replacement keys that are lost or broken due to negligence, or not returned to CATS Safety & Security at the end of their lease. This may include the cost of cores and keys.

Added: The result of a lost or damaged identification card or hard key issued by the Office of Safety and Security could lead to a security breach. It is important that all employees, contractors, tenants, and vendors report lost or stolen identification cards or hard keys and understand that it is their responsibility to contact the Office of Safety and Security for replacements. Any confirmed breach as a result of a lost ID card or hard key will result in immediate key and core replacement at the cost of the department, contractor or tenant.

7.3 Added: Contractor badges are available for each department to check out to a contractor for the day. Each area will document check-in and check-out of badges on Contractor Badge Sign Out Sheets (form S&SF34). Contractor badges must be returned by the end of the business day.

10.0 Removed: Hard Key Issuance Request Form (S&SF20)

Added: Hard Key Issuance Request Form for Employee Contractor (S&SF20A) and Hard Key Issuance Request Form for Tenants (S&SF20B)