



Navy Commercial Access Control System (NCACS) Project

What Are We Doing?

Commander, Navy Installations Command (CNIC), is establishing and standardizing the Navy Commercial Access Control System (NCACS), the enrollment/registration, background vetting/screening, issuance of credentials, and the electronic validation of credentials and verification of access privileges of vendors, contractors, suppliers and service providers not otherwise entitled to the issuance of a Common Access Card (CAC) who seek access to and can provide justification and or purpose to enter Navy installations and facilities. NCACS is being established in order to:

- (1) Comply with Department of Defense (DOD) and Department of Navy (DON) security policy and guidance
- (2) Improve efficiency and effectiveness at Pass and ID offices.

CNIC will accomplish this effort utilizing a process that gives vendors a choice of applying for day passes at the installation, or electing to pay for long-term credentialing provided through contractor support. The contractor supporting NCACS will:

- (1) Enroll Government approved vendor/contractor companies
- (2) Register vendor/contractor company approved employees
- (3) Conduct background vetting/screening of approved vendor/contractor employees
- 4) Manufacture and provide identification credentials for subsequent issuance by the Navy to qualified, vetted and approved vendor/contractor employees
- (5) Electronically validate credentials and verify the access privileges of vendor/contractor companies and their employees participating in NCACS each time they seek access to Navy installations and facilities.

Participation in NCACS by vendors/contractors seeking regular, unescorted access to Navy installations and facilities will be on a voluntary basis. Credentials will be issued every five years and access privileges will be reviewed/renewed on an annual basis. The incentive to participate in NCACS will be:

- (1) A single enterprise process to manage non-CAC entitled vendors, contractors, sub-contractors, suppliers and service providers and their employees across Navy installations and facilities in Continental United States (CONUS), Hawaii and Guam
- (2) Annual access privileges as approved by the local Installation Commanding Officer (ICO)
- (3) Access to multiple Navy and other DoD installations and facilities with one credential
- (4) Significant reduction in wait times at Pass & ID offices to secure a contractor pass and at the perimeter gates to access Navy installations and facilities.

CNIC anticipates that NCACS will be on a low cost/no cost basis to the Government, with fees paid by the participating vendors/contractors serving as the primary source of revenue to support the project. It is anticipated that participating contractors and vendors will receive a rapid return on their costs of participating in NCACS through increased productivity of their participants by eliminating the time delays from obtaining a pass each time they access the installation.

Why Are We Doing This?

The standardized enrollment/registration, vetting, credentialing, electronic credential validation & verification access privileges is expected to yield the following benefits:

- Improve installation and tenant organization security through the management of vendors/contractors by a single methodology.
- Improve installation access control by reducing the number and types of perimeter installation access credentials.
- Improve the safety and security of CNIC installations through the continuous “in near real time” electronic validation of credentials & verification of access privileges of vendors/contractors seeking access to Navy installations and facilities.

- Comply with all applicable DOD and DON security standards.
- Improved efficiencies at installation Pass & ID offices through a reduction in the issuance of contractor passes and other locally produced credentials.
- Cost avoidance for CNIC and other Commands through the reduction of and/or elimination of the purchase and/or annual sustainment of existing locally produced credentialing systems.
- Allow the local ICO to either reap potential cost savings by downscaling Pass & ID office staffing levels or to reassign security assets to other essential duties.
- Afford vendor/contractor employees a more efficient vetting and credentialing process and resulting faster access to Navy installations and facilities.

What Are The Specific DOD Instructions That Require More Stringent Vetting?

CNIC is complying with multiple access control directives from higher authority (Congress and DOD). The requirements for vetting that will be accomplished through NCACS have been mandated by:

- HSPD-12; Homeland Security Presidential Directive
- DTM-09-12; Directive Type Memorandum
- FIPS-201; Federal Information Processing
- P.L. 110-181 (FY 2008) Sec 1069; Public Law, Standards for Entry to Military Installations in the United States
- OPNAVINST 1752.3; Operations Naval Instruction, Policy for Sex Offender Tracking, Assignment and Access Restrictions within the Navy, dtd 27 May 2009

Two additional authorities are anticipated in the near future:

- OPNAVINST 5530.14X(Implementation of DTM-09-12); Navy Physical Security and Law Enforcement Program
- CNICINST 5530.14 (Draft); Commander, Navy Installations Command Instruction, Ashore Protection Program

What Is The Solution?

Based upon the “Proof of Concept” trials conducted in Commander, Navy Region Southwest (CNRW) and Navy District Washington (NDW), it appears that NCACS, as implemented by Eid Passport, Incorporated and the *RAPIDGate*[®] system, will provide a satisfactory 24/7 service that will enable the Navy to ensure that it meets all NCACS security requirements for managing vendors/contractors desiring access to Navy installations and facilities. An Interim Authority to Operate (IATO) has been approved for the system and an Authority to Operate (ATO) is anticipated. While the IATO approves the system to operate on both NMCI and PSNET, the system does not do so at this time. A Privacy Impact Assessment (PIA) has been approved by CNIC and is pending approval from DONCIO.

CNIC will now roll out a NCACS prototype in CONUS, Hawaii and Guam utilizing the *RAPIDGate* system.

It is important to note that although the *RAPIDGate*[®] system has been determined to be a promising and potentially successful solution, that the national roll-out is anticipated to highlight unforeseen problems and challenges, and generate a significant number of lessons learned. Accordingly, this leads to the next question...

Is This a Long or a Short-Term Solution?

NCACS will be applying the *RAPIDGate* system for the CNIC prototype in CONUS, Hawaii and Guam during the next 1-2 years. During the prototype period, it is likely that new issues, challenges, and problems will arise that require alterations and adaptations to the rules, practices, and procedures initially set in place.

In order to promote continual improvement, CNIC will examine and evaluate the current contract performance against several criteria, including:

- Technical capability of the contractor;
- Ability to meet current DOD and DON identity management and installation access standards and flexibility to meet newly emerging/established requirements in the future;
- Ease of use to Navy Pass & ID, security personnel/gate guards;
- Convenience to visiting vendors/contractors;
- Cost to the Navy;
- Cost to visiting vendors/contractors.

These standards will be incorporated into a forthcoming QASP (Quality Assurance Surveillance Plan).

Upon the completion of the prototype, the requirement will be subject to a follow-on full and open competition.

The long-term solution and eventual end-state will depend upon a number of factors, including lessons learned, evolving requirements, refined security standards, new technologies, and available funding. One possible approach would be to develop a fully-automated gate access system (tentatively named NPACS--Navy Physical Access Control System) with vetting processes conducted online from a central location utilizing government employees, contractor personnel, or a combination of both. Before committing to any long-term solution, however, it is essential that the current NCACS and the *RAPIDGate* system be implemented and evaluated.

What Are We Not Doing?

Navy Not Taking Away Local Authority. Although HQ CNIC is providing guidance and enterprise-wide standards, this does not mean that there has been a curtailment or limitation of the authority or discretion of the CNIC Regional Commanders (RC) or local Installation Commanding Officer (ICO) determine who should enter an installation or facility under their command and under what conditions that entry is allowed. Instead, the process is designed to enroll, vet, credential, validate credentials, and electronically verify access privileges thereby providing the local ICO with sufficient information to meet their responsibilities under DOD and DON security standards, requirements, and guidance. Furthermore, although CNIC has published a standard enterprise-wide SOP for the operation of NCACS, RCs and ICOs are expected to implement the project with local SOPs, and procedures are set in place to give commanders the necessary flexibility to adapt to the situations existing at their individual installations. Having said this, the CNIC SOP is designed to maximize the security posture of Navy installations and implement applicable law, regulation, and policy. Common sense and experience leads to the obvious conclusion that few, if any, RCs or ICOs would intentionally choose to ignore pertinent and reliable information relating to the security risk of any given visitor, or to fail to adhere to any applicable statute, regulation, instruction, or policy relating to the physical security of a Navy facility or installation.

Navy Not Increasing the Cost of Business. Given the more robust level of vetting needed to comply with new DOD and Navy standards, CNIC foresaw that that the cost to an individual installation to properly conduct required background checks—and the delays suffered by visiting vendors—would increase significantly. In order to forestall

these challenges, CNIC devised an enterprise-wide solution that provides the RCs and local ICO the ability to comply with applicable security standards and provides vendors the opportunity to maximize savings and avoid pass office delays. Despite any suggestions to the contrary, NCACS is a cost-savings mechanism. In a time of constrained budgets and limited resources, it is expected RCs, ICOs, and the business community will embrace this initiative.

Navy Not “Charging” For Base Access. The Navy is not charging anyone for access to installations. Instead, the Navy is augmenting and upgrading its security in compliance with the directions and guidance of DOD. This will probably result in delays and inconvenience to the vendors/contractors who service our installations and facilities. As a win-win solution, CNIC has selected Eid Passport, Incorporated and the *RAPIDGate* system to implement NCACS as an alternative method of access that permits more ready and convenient entry onto our installations and facilities. Eid Passport does levy a charge for the *RAPIDGate* system, but since vendors/contractors are not required to use this product, there is really no basis to complain. CNIC anticipates that the benefits of ready access will far outweigh any cost that the individual vendors/contractors will incur. If an individual business arrives at a different conclusion regarding the advantages (or lack thereof) of *RAPIDGate*, it may elect to apply for a pass at the designated gate office of an installation.

Navy Not Creating More Stringent Requirements. Despite suggestions to the contrary, neither the Navy in general, nor CNIC in particular, created any new or more onerous security standards. Rather, we are taking positive steps to comply with the law and policy handed to us by higher authority (Congress and DOD).

Navy Not Closing the Doors on Visiting Vendors. The doors of the Navy Pass and ID offices are not being shut in the face of visiting vendors/contractors. Instead, we are taking positive steps to avoid almost certain gridlock that will occur when local installations begin to fully comply with the vetting and credentialing requirements imposed by higher authority. If any vendor/contractor prefers to request a traditional pass, they may still do so.

Navy Not “Rubber Stamping” RAPIDGate Vetting. When the *RAPIDGate* system identifies anomalies in the background of an individual, the installation has options. The installation may determine, consistent with controlling legal authority and applicable guidance, that certain types and categories of derogatory information do not warrant automatic exclusion from the facility. Accordingly, the Installation Commanding Officer

may grant waivers allowing a vendor/contractor to participate in the *RAPIDGate* system or grant a traditional pass.

Navy Not Augmenting Its Budget. The solution will involve a low/no-cost contract. CNIC Office of Counsel has opined that this is legally permissible and does not constitute an illegal augmentation of funds. There is also a DOD Office of General Counsel opinion that reaches the same conclusion.

Navy Not Contracting for Guard Services. The contract with Eid Passport for the *RAPIDGate* system is not a gate guard service.

Navy Not Contracting Out an Inherently Governmental Function. The contract with Eid Passport spells out specific steps in the credentialing process that are reserved to the Navy to ensure that key decisions are made by the Government and that the spirit and intent of HSPD-12, DTM 09-012 and other Government, DOD and DON requirements are met. The Navy will review and make the final determination for access eligibility, and complete ID verification at time of issuance.

And finally...

Navy Is Not Taking Sides. The vendors/contractors that require access to our installations and facilities in order to deliver goods and perform services are important business allies. Eid Passport is also a contractor to the Navy, and is no more or less valuable to our mission. CNIC believes that the relationship between Eid Passport and our other vendors/contractors will be a positive one, based upon a win-win situation of saving "customer" vendors/contractors valuable time while earning Eid Passport a fair profit. However, notwithstanding this, should there be any real or perceived conflict between Eid Passport and other vendors/contractors, neither the Navy in general, nor CNIC in particular, will play favorites. The Navy will exercise independent judgment in determining whether to grant access to each vendor/contractor who applies for entry. Should the unlikely event occur that the *RAPIDGate* vetting process results in an inaccuracy that results in denied access, declined appeal, and subsequent economic harm, such is a matter to be resolved between those private entities, either through negotiations, settlement, or application to the local courts.

Will Tenant Commands Seek To Get CACs for their Contractors?

This is a possibility. However, CAC eligibility and issuance must still meet the requisites provided by DOD, SECNAV, OPNAV and CNIC Notice 5530 guidance. For this purpose, entitlement to a CAC will require the need for both physical access to a Navy installation or facility and logical access to NMCI. These are important standards.

Contractors seeking CACs must be sponsored by Navy Activity “Trusted Agents.” The term “Trusted” is not accidental. We trust the designated Navy Commands to ensure that contractors qualify for CACs, that there is a genuine need to issue a CAC (such as being embedded service contractors with a need to access NMCI), and that the contractor personnel are properly vetted. If that trust is abused merely to assist vendors to circumvent the letter, spirit, or intent of official policy and guidance, then CNIC will be forced to take more stringent measures to ensure the physical security of our Navy installations.

Tenants may also be motivated to provide credentialing in order to meet their restricted area requirements. The *RAPIDGate* system provides only "perimeter" access control. Restricted area credentialing is separate and independent of NCACS.

Is This a Centralized Solution, or to be Implemented at Each Navy Region?

CNIC has issued Notice 5530 and a companion SOP to provide clear direction on implementation of NCACS. NCACS is being implemented by Navy Region in two (2) phases.

- Phase 1: Enrollment/Registration, Vetting, and Credentialing. This component is anticipated to be fully implemented across the CNIC enterprise no later than 15 JUN 2011.
- Phase 2: Enforcement. This component is anticipated to be fully implemented across the CNIC enterprise no later than 15 OCT 2011.

Generally, Phase 1 will be implemented—and the requirements of CNIC Notice 5530 and companion SOP adopted—within 12 to 16 weeks after the ICO receives the Installation Command Brief from the CNIC NCACS Implementation Team with Phase 2 implementation to follow.

HQ, CNIC entered into a no/low cost agreement with Eid Passport, Incorporated for the CNIC prototype in CONUS, Hawaii and Guam. The contract supersedes the pre-existing contracts between Eid Passport with NDW and CNRSW for *RAPIDGate* services. No further contractual action by the Navy Regions is required.

Technical coordination and some basic administrative support, however, must be accomplished at each Navy Region. This support will be minimal. For instance, each installation will be required to provide:

- Sufficient space to place an NCACS registration kiosk and enforcement equipment.
- Electrical power for the NCACS registration kiosk and enforcement equipment.
- One local phone line (POTS line) or broadband (DSL or equivalent) services at each NCACS registration kiosk and at each installation perimeter Entry Control Point (ECP) where there is NCACS enforcement equipment is installed.
- Environmental control systems to maintain proper temperature control for registration kiosks and enforcement equipment.
- Secure storage for identification credentials pending issuance by the Navy.

Has a Strategic Sourcing Initiative Been Accomplished?

A comprehensive strategic sourcing initiative may not be appropriate in this situation, given that one of the most significant aspects of strategic sourcing, *i.e.*, pricing, has already been established at a low/no-cost level. It is unlikely that the economic position of CNIC or the Navy can be improved, given the operation of the Miscellaneous Receipts Act.

Notwithstanding this, CNIC considers this national prototype to be the next step of our long-term acquisition strategy, and it is anticipated that lessons learned will lead us an improved end-state model.

After the national rollout has been accomplished and the prototype effort evaluated, a new market research effort will be performed and a full and open competition will be initiated.

How Long Will the National Prototype Be Conducted?

The current agreement is for one year. CNIC envisions that this nationwide prototype will be completed in 1-2 years. After this, the requirement will be more formally competed.

What, If Anything, Is Being Done to Ensure That Eid Passport Does Not Sell Licenses That Extend Past the Prototype Period?

CNIC will contract with Eid Passport in one year increments. Although a credential may be valid for five years (subject to annual review/renewal), we will work with Eid Passport to ensure that fees are not assessed that extend beyond the term of the NCACS prototype.

What about FiXs?

The Federation for Identity and Cross-Credentialing Systems (FiXs) is a coalition of organizations who have established and maintain a worldwide identity and cross-credentialing network.

FiXs credentials currently are recognized and accepted by DOD as a valid form of *identification*. As such, they are as reliable as a driver's license (and perhaps even more so) for the purpose of determining the identity of an individual. Thus, when applying for access to a Navy installation (such as for a day pass), the FiXs credential will be considered a valid identity document. However, for purposes of gaining *immediate and long-term access* to Navy installations (such as is gained through the use of a CAC or *RAPIDGate* card), FiXs does not yet offer an acceptable solution to the CNIC enterprise or the Navy as a whole. Why the difference? An identity document tells us *who* the individual is (*i.e.*, it proves that the "John Doe" on the card really is "John Doe."). An NCACS-approved access credential, on the other hand, tells us both *who* and *what* the individual is (*i.e.*, through NCACS vetting, updating, and electronic validation, we know that "John Doe" is an upstanding citizen, and not a terrorist or sexual predator). As of the date of this FAQ, the FiXs processes for vetting, procedures for issuance of credentials, methodologies for updating records, protocols for monitoring and reporting new data, and capabilities regarding point-of-entry electronic authentication have not met the standards necessary to allow the cards to be accepted as a means of immediate and long-term access.

In the future, it is possible that the system, procedures, protocols, and technology of FiXs will properly mesh with the security requirements of the Navy that are necessary for granting immediate and long-term access to our installations. Also assuming that accepting FiXs will not place economic burdens on the Navy, it is quite possible that this credential may someday be a viable component of NCACS.

Will Contractors Present Claims for Reimbursement?

The question has been posed as to whether the implementation of NCACS will result in the submission of Contract Disputes Act claims by vendors/contractors alleging that their access to Navy installations and facilities has been restricted, and that costly delays in delivery of goods or performance of services has occurred.

In regard to the cost or benefits of NCACS, CNIC anticipates that at the outset there will be mixed feedback from both vendors/contractors and field activities. Notwithstanding this, as NCACS progresses, the overwhelming benefits—particularly involving the avoidance of delays at installation Pass and ID offices—should be manifest to all. In those situations where a vendor/contractor is dissatisfied with NCACS, the following factors will militate against them either filing a claim, or succeeding in prosecuting a claim if such is submitted:

1. Participation in NCACS is voluntary in nature. If the vendor/contractor considers the cost to be excessive, it can send employees directly to installation Pass and ID offices.
2. Most vendors/contractors send a limited pool of employees to deliver goods or provide services to Navy installations and facilities. The cost of registering a small number of employees will probably not be enough to justify the pursuit of a Contract Disputes Act claim.
3. In those situations wherein a vendor/contractor has a substantial number of employees that require access to Navy installations and facilities, it will be incumbent upon the vendor/contractor to prove its loss/damages. The fact that it pays several thousand dollars per year (or even tens of thousands in extreme cases) is not dispositive of the issue of damages. The vendor/contractor would need to prove that the cost of registering employees in NCACS will exceed the economic benefits derived from the speedy—and long-term—access afforded by NCACS.
4. Eid Passport, Incorporated, has demonstrated a willingness to modify the *RAPIDGate* pricing structure. CNIC anticipates the possibility of high-volume discounts and other remedial measures being taken to ameliorate hardships and assuage concerns. Furthermore, upon award of the forthcoming low/no-cost contract, CNIC plans to incorporate a QASP (Quality Assurance Surveillance Plan) that places a premium on affordability of fees and positive feedback from vendor/contractor “customers.”

Will Contracts Need to Be Modified Regarding Access?

No, and Contracting Officers should not get lured into the argument that the Navy is “forcing” or “requiring” vendors to use the *RAPIDGate* system. The Navy is simply complying with physical security standards that were promulgated by the United States Government and Department of Defense. These standards require stricter scrutiny of visitors, more in-depth vetting of their backgrounds, and more limited access to our installations. Thus, the various legal authorities listed in the FAQs above will result in delays as vendors apply for day passes at our gates. In order to offer a convenient and efficient solution that both meets the requisites of the law, and saves vendors time and money, CNIC has initiated NCACS and offers *RAPIDGate* to vendors may elect to participate on a voluntary basis. If any vendor determines that the cost of *RAPIDGate* is excessive, they may simply apply for access at Navy installation pass offices.

Although current contracts do not require any changes, all future contracts that may involve vendor access to Navy installations should have terms and conditions that notify the vendor about NCACS. All CNIC Headquarters and Regional Activities are to include the following provisions in future Statements of Work (SOW) or Performance Work Statements (PWS) that entails repeated or routine vendor access to the installation:

Commander, Navy Installations Command (CNIC), has established the Navy Commercial Access Control System (NCACS), a standardized process for granting unescorted access privileges to vendors, contractors, suppliers and service providers not otherwise entitled to the issuance of a Common Access Card (CAC) who seek access to and can provide justification to enter Navy installations and facilities. Visiting vendors may obtain daily passes directly from the individual Navy installations by submitting identification credentials for verification and undergoing a criminal screening/ background check. Alternatively, if the vendor so chooses, it may voluntarily elect to obtain long-term credentials through enrollment, registration, background vetting, screening, issuance of credentials, and electronic validation of credentials at its own cost through a designated independent contractor NCACS service provider. Credentials will be issued every five years and access privileges will be reviewed/renewed on an annual basis. The costs incurred to obtain Navy installation access of any kind are not reimbursable, and the price(s) paid for obtaining long-term NCACS credentials will not be approved as a direct cost of this contract. Further information regarding NCACS can be found at http://cnic.navy.mil/CNIC_HQ_Site/index.htm (under “Popular Links”).

CNIC will be working with the Navy's contracting activities (such as NAVSUP and NAVFAC) to explore other methods of ensuring that contractors are placed on notice that the mere enforcement of security procedures at Navy installations does not result in any contractual liability on the part of the Government.

What About Potential "Gaps" In the System?

One of the most compelling reasons to run a prototype is to identify shortcomings, develop effective solutions, and then populate those solutions throughout the Navy. If a Region perceives a weakness in the *RAPIDGate* system (or the accompanying CNIC SOP that implements the process), spots an unresolved vulnerability, or observes a persistent problem, it can remediate the situation with a local solution initiated through the Region's SOP. Naturally, the Region will be expected to collaborate with HQ CNIC. This will ensure that these practices are fully compliant with current security standards, and that any process improvement can either be incorporated into the CNIC SOP or communicated to all Regions as examples of best practices.

Name of Prototype Project

As discussed above, the name of the Navy/CNIC project is entitled "Navy Commercial Access Control System" (NCACS). During the past year, the Navy has used the terms "*RAPIDGate*" and "Non-CAC Credentialing for Vendors and Contractors" (NC3VC), and when referring to this undertaking.

- *RAPIDGate*® is a registered trademark of Eid Passport, Incorporated and CNIC intends to take appropriate steps to avoid the appearance of endorsing Eid Passport or its products.
- "Non-CAC Credentialing for Vendors and Contractors" (NC3VC) was determined to be an unwieldy acronym and has therefore been replaced.

Where Can I Get More Information?

NCACS information will soon be posted on the CNIC external website at http://cnic.navy.mil/CNIC_HQ_Site/index.htm (under "Popular Links")

The *RAPIDGate* information website is: <http://rapidgate.com>

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