



Aviation Security Advisory Committee

Subcommittee on Insider Threat

COVID-19-Related Aviation Insider Risk Considerations

August 2020

Introduction

In June 2018, the Aviation Security Advisory Committee (ASAC) formed a joint industry-government Subcommittee on Insider Threat. Building on previous working group level recommendations and taskings related specifically to aviation worker screening and airport access control, the Subcommittee on Insider Threat is a standing body of industry and government experts responsible for advising the ASAC and the Transportation Security Administration (TSA) on matters related to the insider threat. Per its charter, the Subcommittee may, with the consent of ASAC leadership, act on its own initiative to conduct research to mitigate the insider risk.

In that vein, the Subcommittee, in coordination with ASAC leadership, recently formed a working group to review the impact of the COVID-19 health emergency on the aviation insider risk landscape. This white paper is the result of the working group's effort to capture the impact of the COVID-19 health emergency and associated industry-wide financial and operational consequences on the aviation workforce, with a special focus on the pandemic's impact on the aviation insider risk. This paper provides a brief overview of the current perspective on the state of aviation insider risk due to the COVID-19 health emergency, and considerations that the aviation industry, TSA, and others may want to incorporate into their existing insider risk mitigation efforts. These considerations build from existing best practices and mitigation measures and are not intended as formal recommendations or requirements; however, serious examination of these considerations is deserved and implementation in whole or in part would help mitigate the COVID-19 related insider risk.

Current Perspective

The COVID-19 health emergency has inflicted significant and likely long-term damage to the aviation ecosystem. The health and safety of the traveling public and the aviation workforce, comprised predominantly of essential workers, has become a primary focus for the industry's time and resources. At the same time, the industry must plan for what is an uncertain financial and operational future and must do so with significantly fewer personnel and resources. Despite these immediate and long-term challenges, the industry must remain fully committed to maintaining the security of the aviation ecosystem.

U.S. airports, air carriers, business and general aviation operators, and TSA have implemented multiple layers of risk-based and intelligence-driven security measures designed to mitigate aviation insider risk. Measures include, but are not limited to, robust and recurrent background checks; random and unpredictable physical screening throughout the airport environment; other access control measures; security awareness campaigns; training; intelligence, information and best practice sharing; and utilization of advanced technology and procedures designed to detect threats.

The insider risk landscape has always been dynamic. Dr. Michael Gelles, a managing director at Deloitte Consulting LLP and a known insider threat expert, wrote in an article entitled "[How to handle the risk of insider threats post-COVID-19](#)" that "Unusual times can provoke unusual responses in people. Prolonged

stress may increase anxiety and impulsivity, impair judgment and lead people to become negative and distort their experiences. In times of crisis, individuals can begin to feel desperate, resulting in erratic behavior, potentially increasing the risk of insider events."

As essential workers, the aviation workforce has been subject to extreme stress during this pandemic. Aviation workers have been exposed to and suffered from the coronavirus, including a significant number of deaths across the aviation ecosystem. Three important COVID-19-influenced considerations likely weigh heavily on the aviation workforce: their jobs, their health, and ultimately their future. The industry has gone from profitability to requiring federal assistance in a matter of weeks. With passenger loads not expected to return to pre-COVID-19 levels in the near future and no guarantee of additional federal assistance, the aviation industry is facing the possibility of sizeable layoffs following the September 30 and December 31, 2020 milestone dates established by the "Coronavirus Aid, Relief, and Economic Security Act," or CARES Act. In addition, COVID-19 brings a particular set of health concerns to those who work at an airport. Most are not able to work from home and have regular, direct contact with customers and colleagues. They face challenges as well in complying with CDC guidelines, such as proper physical distancing and wearing a face covering while performing their duties, further increasing their risk of exposure to the disease. These health concerns, as well as livelihood concerns and the unknown future, could strain the psychological well-being of the aviation workforce.

With the dynamic risk environment, industry, in close collaboration with TSA and other federal partners, has an opportunity to proactively refine its current approach to mitigating insider risk in the new aviation operating environment. The following considerations for addressing insider risk in the current aviation environment are offered in the context of industry's existing risk-based and intelligence-driven approach to insider risk mitigation. These considerations are intended to help proactively detect, assess, and respond to insider threats in order to prevent harm to the traveling public and damage to aviation assets. Again, these are not formal recommendations; instead, they are considerations that build upon existing industry best practices and TSA operations, requirements, and recommendations.

Considerations

The following considerations are categorized by subject matter and align closely with the focus areas previously identified by the Subcommittee and endorsed by the full ASAC. Existing industry and government mitigation efforts and best practices also align with these categories.

Leadership and Human Factors – Reflecting on the current pandemic crisis and its ensuing ambiguity amplifies the criticality of leadership and human factors considerations. The benefits of leadership at all levels of an organization and leaders' ability to leverage human factors demonstrate why "people" matter in managing a crisis. People make a difference in navigating complex crises and have the unique ability to mitigate the potential pandemic-induced insider risk in the aviation ecosystem.

- Strong leadership, emotional intelligence, and understanding of the necessary skills to lead during a crisis are encouraged to help employees and organizations adapt to the current operating environment and uncharted business world of the future. Increased capabilities to lead up, down, and across organizations to ensure connectivity of an organization's workforce is an important consideration to mitigate aviation insider risk in the COVID-19 environment and beyond.

- The crisis environment caused by the pandemic highlights the need for crisis leadership and unity of purpose. Unity of purpose is a key principle of Meta-leadership which speaks to the need for essential connectivity of purpose and staff. The [Meta-leadership framework](#) was developed by Harvard's National Preparedness Leadership Initiative (NPLI), a joint program of the [Harvard T.H. Chan School of Public Health](#) and the [Harvard Kennedy School of Government's Center for Public Leadership](#). This framework enables leaders to think and act differently by connecting the efforts of the whole community to galvanize connectivity and achieve unity of purpose and effort. Meta-leadership is especially valuable in times when many different organizations must unite for common purposes.
- Organizations may use this period of time to develop or refine insider threat programs and/or frameworks which reflect COVID-19 considerations and the current risk environment. Executive leadership commitment and participation in providing program direction, governance, and resource allocation is essential to adequately support and sustain insider risk mitigation programs.
- Insider risk is affected by the ability of individuals to exercise good judgment and make sound decisions. It is important to understand the effects of the pandemic on mental, physical, and cognitive health. It may be beneficial to consider placing a greater emphasis on mental health to include resources to support individuals experiencing a mental health crisis. According to preliminary findings of a [study](#) conducted by researchers at San Diego State University and Florida State University, U.S. adults in April 2020 were eight times more likely to fit criteria for serious mental illness and three times more likely to fit criteria for moderate or serious mental illness. As a result, it is likely that a significant number of individuals in the aviation ecosystem are suffering from mental stress, and that number may increase significantly. Mental health resources, awareness, intervention, and referral programs are critical in the current and post-pandemic environment. Consider partnering with local mental health experts at hospitals, medical and educational institutions, and national associations such as [National Alliance on Mental Illness](#) as part of the greater emphasis on mental health resources.
- A surge in financial, work scope, or other stressors will likely increase employee dissatisfaction and/or disgruntlement, resulting in increased insider risk. Financial stressors may include: furloughs, reduced hours, job loss, and potential loss of medical and retirement benefits. Many employers have indicated that severe job losses may occur when the CARES Act payroll subsidy ends on September 30 or December 31, or whenever funding is exhausted. Work scope stressors may include: reduced hours, increased duties and responsibilities, and increased workload. Additional stressors may include: physical distancing challenges, isolation, and stress of surviving a company downsizing. Consideration should be given to the effect of these stressors on employees, as insider risk and the impact of business decisions are assessed.
- In addition to the potential for the current crisis environment and the related stressors to cause previously benign individuals to become security risks, consideration needs to be given to the impact of COVID-19 on aviation workers that may have malicious intent or criminal proclivities. While industry and TSA continue to mitigate security concerns, potential security vulnerabilities coupled with the prospect of job loss may motivate bad actors who are already part of the

aviation ecosystem to take advantage of a strained and potentially vulnerable environment, adjust illegal activity or attack planning, and pull timelines forward. Additionally, there may be a heightened risk of bribery, smuggling, trafficking, and other criminal activity that may thrive as workers are facing economic hardship and are more susceptible to recruitment for nefarious activities.

- The current operating environment, depending on circumstances, may include reduced oversight, decreased workforce briefings, and diminished interpersonal communication with fewer employees and supervisory staff on duty, all of which may result in complacency, apathy, distraction, or isolation. This challenging environment is a potential disruptor to security vigilance and warrants a greater understanding of the psychological and sociological impacts on the individual and the organization.

Threat Detection, Assessment, and Response – Early and accurate detection of potential insider threats will aid both industry and government in their ability to assess and respond to events before significant damage might be inflicted on the aviation ecosystem. As discussed, the aviation workforce is facing a myriad of new and unique challenges due to the current pandemic. The additional mental, emotional, and financial stressors placed upon employees and their families, compounded by ongoing uncertainty within the aviation ecosystem, could result in high-risk behaviors that are atypical, and potentially expose preexisting or new vulnerabilities to exploitation.

- TSA and industry should consider working together to continue implementing a layered security approach, which emphasizes proper training, adherence to policies and procedures, and reporting suspicious or concerning behaviors. Emphasis may be placed on the importance of employees remaining vigilant in the current environment, and the realization that significant security threats still exist despite the overall decrease in passenger volume. Employees should be aware of the potential indicators of insider threat specific to the aviation ecosystem, including: significant changes in work performance, failure to follow security policies, attempts to circumvent security measures, access control violations, increased aggression or disgruntlement, withdrawal, and unusual interest in security matters outside the scope of their employment, among others. These behavioral indicators, coupled with the additional stressors which are present due to the pandemic, may represent a potential increase in insider risk.
- To assist in mitigating the insider risk, TSA and industry should consider adopting behavioral threat assessment techniques as standard security practices. As the threat environment continues to change and threats of targeted violence increase, adjusting practices in reporting suspicious activity and investigating concerning behaviors, beyond those that are criminal or terrorist in nature, will help reduce the insider risk. Behavioral threat assessment is an evidence-based investigative process that identifies, assesses, and manages the risk of targeted violence and its potential perpetrators, as coined by the U.S. Secret Service. Utilizing this process will assist in diverting individuals of concern from progressing down a pathway to violence.
- TSA and industry can promote a shared security culture which values and encourages the input and suggestions of frontline employees to identify and report security vulnerabilities in order to enhance early insider risk detection and mitigation across the ecosystem. Security concerns often vary depending on the environment, and frontline employees are well-suited to identify and report warning signs of potential risk indicators emerging in their particular environment.

Employees should feel empowered to report and should continue to be educated on how to report security concerns and vulnerabilities without fear of reprisal or retribution.

- Security officials should consider ensuring that previously identified vulnerabilities from the insider threat perspective are regularly re-assessed, under the current and post-pandemic operating environments, to enable adequate risk mitigation and early response before a threat can manifest itself at an airport or onboard an aircraft in-flight.
- TSA and local airport security officials can also consider re-allocating law enforcement and security resources, which may be available due to a decrease in passenger volume, to other mitigation activities, based on the level of relative insider risk and in more vulnerable areas of the aviation ecosystem.

Aviation Worker Screening and Access Control – Aviation worker screening and access control is a fundamental layer of risk-based aviation insider risk mitigation. Considerations build on current efforts to strengthen risk-based screening and access controls through the effective physical screening of individuals and their possessions, as well as effective access control elements, including multifactor security measures.

- With over half of the U.S. aircraft fleet parked, consider effective aircraft access control measures to help prevent aircraft sabotage, including increased ramp and Air Operations Area presence by TSA Advanced Threat Local Allocation Strategy (ATLAS) teams and other aviation security resources.
- A high volume of separations can cause lagging access (physical and virtual), potentially leaving an aviation entity exposed after an employee is released. Badge/identification (ID) media deactivation and/or surrender for furloughed employees can be an effective measure. Consideration should be given to quickly removing access, ID media, and company property from furloughed employees.
- Review and refine access privileges and access points to the Security Restricted Areas (SRA) with the airport community and tenants. Priority may be given to companies that are reducing their local workforce.
- Adjust, as appropriate, employee screening protocols to ensure proper physical distancing and explore options, such as technology, to reduce the need for contact during the screening process. Those conducting screening should use appropriate personal protective equipment to reduce the risk of infection.
- Consider exploring new and different physical inspection methods and screening techniques, such as remote inspections. Take lessons learned from TSA's screening operations to introduce reduced-touch and contact-free standard operating procedures.

Training and Engagement – Training and engagement considerations are intended to further focus insider threat training programs that are tailored to aviation workers, raise awareness of insider risk indicators and motivators, and engage the community to recognize best practices and report potential threats.

- Review insider threat awareness training to potentially include content focused on recognizing signs of mental distress and available mitigation options to encourage wellness.
- At meetings between airport authorities and airport stakeholders (tenant managers, authorized signatories, vendors, etc.), encourage increased vigilance and continued effective security incident reporting. Counter potential complacency with increased employee engagement and explore digital options to replace traditional face-to-face meetings and briefings. Examples such as social engineering vulnerabilities can emphasize that security must always be maintained, even in a strained environment and with former colleagues.
- To promote social responsibility and support physical distancing, consider developing alternative methods and tools to deliver training while increasing awareness and engagement to account for decreased face-to-face meetings.
- Continue to promote a security culture where employees take responsibility for their own actions and for the actions of their coworkers. The pandemic is an added distractor to building a strong security culture as individuals may be prioritizing their personal security over the security culture of the organization. Employees need to be reminded that they are responsible and accountable for their actions and understand the positive impact on the aviation ecosystem of their contributions to security. Consideration may be given to recognition programs, training programs, and other efforts to create a sense of security ownership across the workforce.
- Consider additional engagement of employees as part of the security culture and as front-line eyes and ears to any potential security risks. Aviation workers are a security force multiplier and are essential to keeping the industry and traveling public safe. They are positioned to identify risk factors and to observe warning behaviors from individuals as they occur. Through a collaborative effort, aviation employers, operators, and representatives such as labor unions can work together to empower bystanders to become upstanders and proactively report concerning behaviors. Additional training and awareness campaigns that focus on identifying concerning behaviors and reinforce how to report these concerns will likely encourage increased reporting. As an organization's culture may shift during the pandemic, regular communication with employees is essential to keep everyone apprised of changes and how best to adapt to pandemic conditions.
- Examine aviation security norms and requirements that require close physical proximity, such as challenging individuals, preventing "piggybacking" through controlled access points, and reporting suspicious persons. Reassess, and consider making adjustments consistent with continued security. In the pandemic environment, employees may be reluctant to conduct established security and preventative security actions because of concern for their personal safety, physical distancing, and the desire to avoid close human contact. For example, the simple act of observing a badge may be difficult if proper physical distancing is maintained and face coverings are being utilized.
- Behavioral threat assessment training may help identify warning signs, stressors, grievances, and triggers that may be exacerbated by the pandemic. Identifying these behaviors and conducting behavioral threat assessments may assist in identifying individuals who are

potentially on the pathway to violence, and provide opportunities for early intervention. This training should be considered as an additional insider risk mitigation tool.

Information Sharing – Crucial to mitigating insider threat activity is the information needed to detect it. Enhanced information sharing and collaboration between industry and government has the potential to significantly improve insider risk mitigation across the aviation ecosystem.

- Given the rapidly shifting environment, industry needs detailed intelligence and analysis from DHS, TSA, and other government partners regarding specific insider incidents, behavior risk indicators, and security vulnerability incidents and trends. Consider increased intelligence sharing between the Intelligence Community and all industry stakeholders to increase awareness and vigilance.
- Airport authorities may consider evaluating social media content of tenant companies during workforce reduction periods as appropriate.
- Airport operators can add to a strong security culture by encouraging tenants to notify the airport operator and broader airport community of forthcoming layoffs. Resources could then be focused on the impacted tenant, employees, and surrounding area as needed.

Summary and Conclusion

The impacts and reverberations of the COVID-19 health emergency will likely be felt by the aviation industry and its workforce for the foreseeable future. As discussed, these impacts have likely influenced insider risk across the aviation ecosystem. Whether resulting from mental, financial, or other stressors, the pressure being felt across the industry is of concern, as is the potential insider risks it may be generating. While this pandemic has had an unprecedented effect on the aviation industry, it has also provided the aviation industry an opportunity to proactively refine its approach to insider risk mitigation. The considerations provided in this white paper are designed to promote COVID-19-related insider risk mitigation, as well as promote the mental health and well-being of the aviation workforce. Nevertheless, many if not all of these considerations have broad applicability beyond the pandemic, as they serve to build upon best practices already agreed upon and recommended by the TSA and industry stakeholders, and should be considered as part of a multi-layered, risk-based, and intelligence-driven insider risk mitigation strategy.