

**Biometric Air Exit Recommendations by Implementer**

	<b>Justified</b>	<b>Voluntary</b>	<b>Private</b>	<b>Equitable</b>	<b>Transparent</b>	<b>Lawful</b>	<b>Ethical</b>
<b>Recommendations If Port Implements a Common Use Biometric Air Exit Program</b>	<p>Port staff must receive approval from the Aviation Managing Director, including by providing an explanation of compliance with Port &amp; CBP policies.</p> <p>If implementation does not require Commission authorization, Managing Director must notify Port Executive Director and Port Commission at least three weeks before approving the request. The Managing Director must use the articulated criteria in their decision, and should seek feedback from the Technology Ethical Advisory Board.</p> <p>If the requested implementation requires a Commission authorization, then the Commission memo must include complies with Port policies and a recommendation from the Aviation Managing Director.</p> <p>If the implementation requires a procurement, the vendor solicitation document must include a request for explanation of how the technology will comply with Port and CBP policies.</p> <p>If the Port implements a common use biometric air exit solution, it must be used for all departing international flights at SEA.</p>	<p>If Port implementation requires a procurement, the vendor proposal must include how its technology can help minimize the unintended capture of images of nontravelers or visitors.</p> <p>The Port should develop standards and guidelines for where and how facial recognition cameras can be used at international departure gates to avoid unintended image capture.</p> <p>The Port should design training standards for all users of biometric exit technology at SEA that includes the abovementioned standards for avoiding unintended capture.</p> <p>The Port should continue to pursue whether opt-in is allowed and logistically feasible. If it is, opt-in is a preferable way to implement the voluntary nature of the program.</p>	<p>If Port implementation requires a procurement, all vendor proposals must include an explanation of how the technology solution will meet the Port’s biometric Privacy principles and CBP’s Biometric Air Exit Requirements.</p> <p>The Port should seek clarification from the State of Washington Attorney General whether transmission of biometric data to CBP is exempt from state public disclosure requirements.</p> <p>All transmission of biometric data to CBP should meet CBP’s Biometric Air Exit Requirements.</p>	<p>If Port implementation requires a procurement, then the vendor proposal must include an explanation of how it will meet the Port and CBP policies.</p> <p>The Port should request updated accuracy rates from CBP.</p> <p>The Port should develop training standards for collecting and processing biometric data.</p>	<p>If Port implementation requires a procurement, the vendor proposal must include an explanation of how it will support efforts to meet the Port’s biometric Transparent principle, and support efforts to develop performance reports on a regular basis.</p> <p>The Port should develop a comprehensive communications plan.</p> <p>The Port should produce an annual accountability report.</p> <p>The Port should conduct its own performance evaluation.</p>	<p>Port must comply with all state and federal laws including privacy and discrimination laws.</p> <p>Port staff should develop a comprehensive understanding of how local, state and federal data breach statutes would apply to a biometric air exit data breach, and what recourse travelers would have in those situations. This information should be shared as part of the Port communications plan.</p> <p>Port should advocate for state and federal laws and regulations that codify the goals of the Port’s biometric principles.</p>	<p>The Port should develop an engagement plan to educate local immigrant and refugee communities about the biometric air exit program.</p> <p>The Port should inform local immigrant and refugee communities about resources for sharing concerns.</p> <p>The Port should form a Technology Ethical Advisory Board.</p>

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<p><b>Recommendations If Port Allows Airlines to Implement a Biometric Air Exit Program</b></p>	<p>Airlines must receive approval from the Aviation Managing Director, including by providing an explanation of compliance with Port &amp; CBP policies.</p> <p>Managing Director must notify Port Executive Director and Port Commission at least three weeks before approving the request. The Managing Director must use the articulated criteria in their decision, and should seek feedback from the Technology Ethical Advisory Board.</p>	<p>The Port should develop standards and guidelines for where and how facial recognition cameras can be used at international departure gates to avoid unintended image capture.</p> <p>The Port should design training standards for all users of biometric exit technology at SEA that includes the abovementioned standards for avoiding unintended capture.</p> <p>The Port should continue to pursue whether opt-in is allowed and logistically feasible. If it is, opt-in is a preferable way to implement the voluntary nature of the program.</p>	<p>All transmission of biometric data to CBP should meet CBP's Biometric Air Exit Requirements.</p>	<p>The Port should request updated accuracy rates from CBP.</p> <p>The Port should develop training standards for collecting and processing biometric data.</p>	<p>The Port should develop a comprehensive communications plan.</p> <p>The Port should produce an annual accountability report.</p> <p>The Port should conduct its own performance evaluation.</p>	<p>Airlines must comply with all federal and some state laws including privacy and discrimination laws.</p> <p>Port staff should develop a comprehensive understanding of how local, state and federal data breach statutes would apply to a biometric air exit data breach, and what recourse travelers would have in those situations. This information should be shared as part of the Port communications plan.</p> <p>Port should advocate for state and federal laws and regulations that codify the goals of the Port's biometric principles.</p>	<p>The Port should develop an engagement plan to educate local immigrant and refugee communities about the biometric air exit program.</p> <p>The Port should inform local immigrant and refugee communities about resources for sharing concerns.</p> <p>The Port should form a Technology Ethical Advisory Board.</p>
<p><b>Recommendations If CBP Implements Biometric Air Exit Under Federal Jurisdiction</b></p>	<p>If CBP plans to implement or expand biometric exit at SEA, they should notify the Port in advance.</p>	<p><i>Port would have no control over CBP related to Voluntary, other than CBP's current opt-out regulations.</i></p>	<p><i>Port would have no control over CBP related to Privacy, other than CBP's current privacy regulations.</i></p>	<p><i>Port would have no control over CBP related to Equitable, other than CBP's current algorithm testing by NIST.</i></p>	<p>The Port should develop a comprehensive communications plan.</p> <p>The Port should produce an annual accountability report.</p> <p>The Port should conduct its own performance evaluation.</p>	<p>CBP must comply with all federal laws including privacy and discrimination laws.</p> <p>Port staff should develop a comprehensive understanding of how local, state and federal data breach statutes would apply to a biometric air exit data breach, and what recourse travelers would have in those situations. This information should be shared as part of the Port communications plan.</p> <p>Port should advocate for state and federal laws and regulations that codify the goals of the Port's biometric principles.</p>	<p>The Port should develop an engagement plan to educate local immigrant and refugee communities about the biometric air exit program.</p> <p>The Port should inform local immigrant and refugee communities about resources for sharing concerns.</p>