Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the Homeland Security Act of 2002 (Public Law 107-296) by amendment to the Inspector General Act of 1978. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the Transportation Security Administration’s effectiveness in supporting mass transit and passenger rail stakeholders with preparing for and responding to emergencies. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

Richard L. Skinner
Inspector General
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Abbreviations

BASE Baseline Assessment and Security Enhancement
DHS Department of Homeland Security
I-STEP Intermodal Security Training and Exercise Program
TSA Transportation Security Administration
TSGP Transit Security Grant Program
The Transportation Security Administration is responsible for security in all modes of transportation, including mass transit and passenger rail systems. Passenger rail systems face a dynamic landscape of potential natural disasters, accidents, and terrorist attacks. Since 1995, there have been more than 250 terrorist attacks worldwide against rail targets, resulting in nearly 900 deaths and more than 6,000 injuries. The Transportation Security Administration, the Federal Transit Administration, the Federal Railroad Administration, and the Federal Emergency Management Agency share responsibilities, programs, and resource investments to mass transit and passenger rail emergencies. We evaluated the Transportation Security Administration’s effectiveness in supporting mass transit and passenger rail agencies in preparing for and responding to emergency incidents.

The Transportation Security Administration can better support passenger rail agencies by improving its assessments of emergency preparedness and response capabilities. The agency can also improve its efforts to train passenger rail agencies and first responders, and ensure that drills and exercises are live and more realistic to help strengthen response capabilities. The agency has focused primarily on security and terrorism prevention efforts, while providing limited staff and resources to emergency preparedness and response. As a result, passenger rail agencies and the first responders they rely upon may not be adequately prepared to handle all emergencies or mitigate their consequences.

We are making four recommendations that, if implemented, would improve the agency’s overall management and effectiveness in supporting passenger rail agencies’ emergency preparedness and response capabilities. The Transportation Security Administration concurred with all four recommendations and has taken actions to address them.
Background

Passenger rail systems face a dynamic landscape of potential natural disasters, accidents, and terrorist attacks. Since 1995, there have been more than 250 terrorist attacks worldwide against passenger rail targets, resulting in nearly 900 deaths and more than 6,000 injuries. This mode of transportation has been targeted in Moscow, Madrid, London, and Mumbai. (See figure 1.)

Figure 1. On March 11, 2004, terrorists bombed passenger trains near Madrid’s Atocha station, killing 191 people and injuring 1,800.
Source: Reuters

Also, accidents can cause fatalities and injuries. For instance, in 2008, a collision between a freight train and commuter rail train occurred in Chatsworth, California, when the commuter rail train failed to stop at a control point. This accident killed 25 people and injured 135 others.

Passenger rail systems consist primarily of three types of transportation:

- **Commuter rail** operates between city centers and their adjacent suburbs.
- **Heavy rail**, also known as metro, subway, and rapid transit, supports a heavy volume of passenger traffic.
Light rail, also called streetcar, tramway, or trolley, operates electric passenger cars on fixed rails.

Our Nation’s passenger rail network is critical to our way of life, transporting more than 12 million commuters each day. See appendix C for detailed statistics. The Transportation Security Administration (TSA) is responsible for security in all modes of transportation, employing various programs and processes to support passenger rail stakeholders’ preparedness and response capabilities. See appendix D for information regarding TSA Security Directives and the Transportation Security Sector Specific Plans.

Our review focused on four TSA efforts:

1. The Baseline Assessment and Security Enhancement (BASE) program is a voluntary program implemented by Transportation Security Inspectors in the Office of Security Operations. The BASE program assessment is composed of more than 200 questions for reviewing a transit system’s security and emergency preparedness posture regarding 17 Security and Emergency Preparedness Action Items. See appendix E for these action items. Inspectors review documents, question passenger rail personnel, and observe security measures within the transit system. The inspectors use a database tool to assign numerical scores to the transit system based on the evidence gathered for each of the action items. The BASE program seeks to identify program gaps or weaknesses and develop best practices applicable to all passenger rail systems. As of December 2009, inspectors have completed more than 130 BASE assessments, covering most of the largest 100 agencies in passenger volume.

2. The Public Transportation Emergency Preparedness Workshops (Connecting Communities) are jointly managed and funded by TSA’s Mass Transit Division and the Department of Transportation’s Federal Transit Administration. The workshops integrate mass transit and passenger rail security, operations, and emergency management officials with law enforcement and emergency response partners in their operating areas. The goal of the workshops is to unite passenger rail stakeholders from a variety of organizations, including first responders, to foster dialogue, improve planning efforts, review past experiences, analyze best practices, and identify assets and resources to enhance overall interoperability and response during passenger rail incidents. First responders include firefighters and emergency medical personnel.
who arrive first on the scene of an emergency incident and take action to save lives, protect property, and meet basic human needs.

3. The Training Matrix and Recommended Courses List is coordinated by the Office of Transportation Sector Network Management to support mass transit and passenger rail agencies’ security and emergency management training. The list includes recommended instruction in security awareness, behavior recognition, immediate-emergency response, the National Incident Management System, and Operations Control Center Readiness. Instruction is provided through the Transit Security Grant Program (TSGP), which is jointly managed by TSA and the Federal Emergency Management Agency. The TSGP provides funds to owners and operators of mass transit and passenger rail systems to protect the critical surface transportation infrastructure and the traveling public from acts of terrorism, major disasters, and other emergencies.

4. The Intermodal Security Training and Exercise Program (I-STEP) is designed to improve the intermodal transportation industry’s ability to prepare for and respond to transportation security incidents by increasing awareness, improving processes, creating partnerships, and delivering training exercises to mass transit and passenger rail stakeholders. Through the I-STEP, TSA employs multi-phased workshops, table top exercises, and working groups to integrate mass transit and passenger rail agencies with regional law enforcement and emergency response partners to expand and enhance coordinated deterrent and incident management capabilities. This program is prepared and presented by TSA’s Office of Security Training and Exercise Coordination, along with TSA’s Port and Intermodal Security Division.

For additional information on the TSA offices mentioned above and other related initiatives, see appendix F. For a description of the various programs and processes to support passenger rail stakeholders’ preparedness and response capabilities, see appendix G.
Results of Audit

**TSA Can Improve Its Assistance to Passenger Rail Agencies**

TSA, the Federal Transit Administration, the Federal Railroad Administration, and the Federal Emergency Management Agency share responsibilities, programs, and resource investments to mass transit and passenger rail emergencies. Although TSA has a limited role in this area, the agency can better support mass transit and passenger rail agencies by improving the tools and processes used to assess emergency preparedness and response capabilities. The agency can also improve its efforts to train passenger rail agencies and first responders, and ensure that drills and exercises are live and realistic to help strengthen response capabilities.

TSA has focused primarily on security efforts, while providing limited staff and resources to emergency preparedness and response. As a result, passenger rail agencies and the first responders they rely on may not be adequately prepared to respond to emergencies or mitigate the consequences of emergency incidents.

**BASE Tools, Processes, and Training**

TSA needs to provide a more effective database tool along with increased detailed training and guidance for inspectors to ensure that BASE assessments gather effective, objective data. The *Implementing Recommendations of the 9/11 Commission Act of 2007*, Section 1405, requires DHS to review passenger rail plans and security assessments to identify weaknesses in emergency response planning and employee training. Section 1408 of the Act requires DHS to promulgate regulations requiring public transportation agencies determined by the Secretary to be at high risk of terrorism to develop and implement security plans. The security plans must specify which elements need to be addressed.

TSA implemented the BASE program to develop a baseline understanding of passenger rail agencies’ security and emergency preparedness; however, the program employs assessment processes and a database tool that do not consistently gather, review, and score data regarding passenger rail stakeholders’ emergency preparedness and response capabilities. Currently, TSA provides only 7.5 hours of inspection and assessment training in the 80-hour basic training curriculum, and the database tool consists of generic fill-in-the-blank sections that allow inspectors to use their discretion when entering or omitting any assessment information.
Some Assistant Federal Security Directors and inspectors at different locations described inconsistent processes for conducting BASE assessments. One Assistant Federal Security Director informed us that the BASE process consisted primarily of a documentation review. Two Transportation Security Inspectors in another location stated that interviews are conducted following the documentation review. One inspector allowed passenger rail agencies to answer the BASE questions alone, while two inspectors from a different location explained that inspectors collaborate with the stakeholders to answer the questions. Inspectors, Assistant Federal Security Directors, and other TSA officials confirmed that more training is needed to conduct BASE assessments.

TSA officials confirm that they have begun updating the BASE database tool and assessment procedures, as well as the inspectors’ training curriculum. In 2010, the Office of Security Operations plans to improve the database tool with standardized drop-down menus requiring inspectors to select their assigned scores for designated fields. This will enable TSA to gather more standardized data. The new database tool will also have a verification section, which will require inspectors to support their findings and scoring decisions with detailed evidence.

TSA officials explained that the inspector training curriculum will be expanded by 40 hours in length, with 8-12 hours dedicated to more in-depth BASE training for new inspectors, in addition to increased on-the-job and refresher training. TSA is also building a dedicated surface training facility, which is expected to open in 2010. This facility will be used for BASE assessment training and will also provide simulations of emergency situations for inspectors and other passenger rail stakeholders to practice implementing emergency response plans and procedures.

**Emergency Preparedness Workshops**

TSA should provide increased support to programs focused on expanding and enhancing regional collaboration in terrorism prevention and emergency response. In September 2005, DHS and the Department of Transportation signed a Memorandum of Understanding to jointly fund and sponsor the Connecting Communities workshops. The Memorandum of Understanding requires that TSA and the Federal Transit Administration jointly sponsor the Connecting Communities workshops, and that all
aspects of the workshops be closely coordinated among the parties. The goal of these workshops is to train and better coordinate assets and specialized resources of transit and transportation systems with their local, county, and state emergency managers and first responders.

TSA officials noted that TSA primarily focused on security and counterterrorism issues and did not recognize the Connecting Communities workshops effort as a priority. According to the Federal Transit Administration, TSA has provided only $25,000 for the Connecting Communities workshops since 2006. The Federal Transit Administration has funded all but 1 of the 20 workshops. Based on the current level of funding, only eight Connecting Communities workshops may be held annually. According to TSA officials, the agency was able and willing to provide more funding to the Connecting Communities workshops; however, the Federal Transit Administration did not seek additional support.

**Training Matrix and Course List**

TSA should provide more training focused on emergency preparedness and response for passenger rail stakeholders and first responders. The *Implementing Recommendations of the 9/11 Commission Act of 2007*, Sections 1408 and 1517, direct DHS to develop and issue regulations for training programs to prepare public transportation employees and railroad frontline employees for potential security threats and conditions. DHS designated TSA to develop these regulations in consultation with appropriate law enforcement, fire service, emergency response experts, passenger rail stakeholders, and nonprofit employee labor organizations representing railroad employees or emergency response personnel.

Based on insight gained from the BASE assessments, TSA developed the Mass Transit Security Training Program matrix and course list. The list includes 103 courses sponsored by TSA, the Federal Transit Administration, and the Federal Emergency Management Agency, with subjects ranging from cyber-security to citizen preparedness. More than half of the courses focus on law enforcement management of security incidents based on weapons of mass destruction scenarios, such as *Prevention and Deterrence of Terrorist Acts by Law Enforcement* and *Managing the Incident: A Leadership Guide to WMD Events*. Few training courses focus on passenger rail frontline employees, firefighter response efforts,
or the threats posed specifically by improvised explosive devices. For example,

- Fifty-four courses focus on law enforcement management of security incidents.
- Two courses focus on mass transit and passenger rail systems.
- Two courses focus on preparing emergency responders to perform critical response actions during improvised explosive device incidents.
- One course focuses on performance-level training for firefighters.

TSA officials stated that they made the conscious decision to focus on security and law enforcement efforts because they believed that much of the training and exercises occurring in DHS, and at the state and local levels, was already heavily focused on response and recovery efforts. As a result, passenger rail frontline employees and firefighters may not be receiving the training needed to respond to emergencies in the passenger rail systems.

**Intermodal Security Training and Exercise Program**

TSA should conduct more Intermodal Security Training and Exercise Program (I-STEP) sessions that include an increased number of firefighter representatives and live field drills. The *Implementing Recommendations of the 9/11 Commission Act of 2007*, Sections 1407 and 1516, require DHS to establish a program for conducting security exercises for public transportation agencies and railroad carriers for the purpose of assessing and improving their abilities to prevent, prepare for, mitigate against, respond to, and recover from acts of terrorism. These exercises should be live and realistic. TSA’s I-STEP is implemented to fulfill this requirement.

TSA has not dedicated a full staff and resources to support I-STEP. TSA’s Mass Transit Division is responsible for coordinating mass transit and passenger rail applications of I-STEP, but the limited staff and resources hampers I-STEP’s efforts. The division has one director with no other full-time staff to conduct the outreach and coordinate with regional passenger rail stakeholders while helping develop a series of training workshops. The Mass Transit Division is in the process of hiring a dedicated transportation security specialist to work for the director of the I-STEP and related efforts. Planning and coordinating these sessions is labor-
intensive because it involves preparing for the exercises in different geographic regions and building and maintaining relationships to get the right passenger rail stakeholder participation.

TSA has conducted only three I-STEP sessions in the past 2 years. In contrast, the Port and Intermodal Security Division, when coordinating with the Coast Guard, conducted 40 Port-STEP exercises in 2 years. I-STEP primarily focuses on security operations during a Table Top Exercise, and does not include a live drill or exercise component regarding security or first responder emergency response.

TSA officials confirmed that they consciously focused I-STEP on security and prevention efforts, not on emergency response or recovery. TSA decided to exclude a live drill component from the program because it believed that the component would hamper the program implementation in its early stages. TSA also wanted to get the program up and running as soon as possible.

**Conclusion**

Without consistently assessing emergency preparedness and response capabilities of passenger rail agencies, TSA is unable to effectively develop corrective actions for these agencies to implement, prepare for, and respond to emergencies in their mass transit systems. The insufficient funding and resources provided to emergency response workshops prevent TSA from ensuring that key stakeholders are ready to handle emergency events. Because TSA has not provided enough training, including live field drills with first responders well represented, passenger rail employees and the first responders they rely on may not be prepared to respond to emergency incidents in their systems.

**Recommendations**

We recommend that the Transportation Security Administration’s Acting Administrator:

**Recommendation #1:** Improve the Baseline Assessment and Security Enhancement program by (a) expediting the process to develop and implement the new database tool to ensure that the assessments effectively capture consistent and objective data; and (b) ensuring more comprehensive and recurring BASE assessment
training for Transportation Security Inspectors to ensure consistent, effective, and objective data gathering.

**Recommendation #2**: Improve the emergency preparedness workshops, such as the Connecting Communities workshops by (a) increasing coordination with the Federal Transit Administration to ensure compliance with the Memorandum of Understanding, and (b) providing financial support to increase the number of sessions held annually.

**Recommendation #3**: Improve the Training Matrix and Recommended Courses List in the Transportation Security Grant Program by (a) ensuring that the Transportation Security Administration coordinates and communicates with passenger rail stakeholders when developing the new list, and (b) increasing the number of emergency preparedness and response courses focused on mass transit and passenger rail systems and the threats posed by improvised explosive devices.

**Recommendation #4**: Strengthen the Intermodal-Security Training and Exercise Program by (a) increasing the number of full-time employees in the Mass Transit Division, (b) expediting delivery of an increased number of Intermodal-Security Training and Exercise Program sessions to passenger rail stakeholders, (c) increasing the number of firefighters participating in the sessions, and (d) incorporating live, realistic field drills and exercises into the Intermodal-Security Training and Exercise Program sessions.

**Management Comments and OIG Analysis**

TSA’s Mass Transit Division provided technical comments before providing official management comments to our draft report, concurring with all four recommendations. A copy of the Mass Transit Division’s response, in its entirety, appears in Appendix B. Our summary and analysis of TSA’s written official response follows.

**Management Comments to Recommendation 1**

**TSA Concurs**: TSA responded that the Office of Compliance is in the process of developing a 40-hour surface transportation specialty training program at TSA's surface transportation training
center in Pueblo, Colorado. The program will incorporate an additional 8-12 hours of in-depth BASE program training for TSA Surface Inspectors. This training will also include the application of the automated BASE assessment tool that has been developed to enhance efficiency of data collection, integration, and analysis.

**OIG Analysis:** This recommendation is resolved, but remains open pending confirmation that (a) TSA has begun implementing the BASE program’s new database tool, and that (b) Transportation Security Inspectors are receiving the more comprehensive BASE assessment training.

**Management Comments to Recommendation 2**

TSA Concurs: TSA indicated that a flexible approach, adaptable to changing circumstances, should be maintained in efforts to enhance security and emergency preparedness. As opposed to citing a particular program such as Connecting Communities, TSA agreed with providing increased support to broader efforts to expand and enhance emergency preparedness in mass transit and passenger rail systems through coordination with regional law enforcement, first responders, state and local officials, and federal partners.

**OIG Analysis:** This recommendation is resolved, but remains open pending confirmation that TSA is increasing coordination efforts with regional law enforcement, first responders, State and local officials, and federal partners to expand and enhance emergency preparedness in mass transit and passenger rail systems. TSA should increase coordination with the Federal Transit Administration to ensure compliance with the current Memorandum of Understanding providing for financial support to increase the number of emergency preparedness workshop sessions held annually, specifically considering the Connecting Communities workshops.

**Management Comments to Recommendation 3**

TSA Concurs: TSA is working to develop a more comprehensive training matrix that identifies types of training across the spectrum of emergency prevention, continuity of operations, response, post event recovery, and restoration to normal service. The improved matrix will identify the key participants and employees, as well as the training available to those groups. The matrix will also present
a general baseline training that should be provided to mass transit and passenger rail employees.

TSA noted that emphasis will be placed on training to recognize, report, and respond effectively to suspected or confirmed improvised explosive devices. This effort will be conducted with the participation of the Federal Transit Administration and Federal Emergency Management Agency, recognizing the broader roles and responsibilities these organizations have in this area. As with other TSA initiatives, input will be sought from mass transit and passenger rail security partners on training they see as critical to secure their facilities, as well as on the content and format of the updated training matrix. Of particular relevance to this collaborative effort, TSA partnered with FEMA to provide language for a FY 2010 DHS grant in the amount of $5 million for surface transportation and emergency preparedness response training courses. Courses such as Bomb Squad Response to Transportation Systems-Mass Transit will focus on awareness of and threats posed by improvised explosive devices.

**OIG Analysis:** This recommendation is resolved, but will remain open pending confirmation that TSA has made progress in its plans to improve the Training Matrix and Recommended Courses through coordination and communication with passenger rail stakeholders. TSA’s operational program, Bomb Squad Response to Transportation Systems-Mass Transit, may increase the amount of training focused on the threats posed by improvised explosive devices; however, we would like confirmation on the status of the sessions planned during 2010.

**Management Comments to Recommendation 4**

**TSA Concurs:** TSA’s Mass Transit Division is in the process of hiring a dedicated transportation security specialist to work directly for the director of the I-STEP and related efforts. TSA has 4 to 6 iterations of I-STEP currently projected for 2010. The agency is considering integrating live elements into I-STEP.

TSA envisions using the surface transportation training center, scheduled to open in Pueblo, CO in the spring of 2010, to help expand and conduct live exercises focused on terrorism prevention and response in mass transit and passenger rail. The capabilities projected for the training center will allow for increased participation by law enforcement officers, firefighters, other
emergency responders, and federal security partners, as well as the incorporation of live, realistic, field drills and exercises.

**OIG Analysis:** This recommendation is resolved, but will remain open until TSA provides confirmation that the agency has increased the number of full-time employees in the Mass Transit Division, increased the number of I-STEP sessions, increased the number of firefighters participating in the sessions, and coordinated and incorporated live, realistic field drills and exercises into the I-STEP sessions.
Our audit objective was to evaluate TSA’s effectiveness in assisting passenger rail and mass transit stakeholders with preparing for and responding to emergencies.

To answer our objective, we obtained and reviewed applicable federal laws and regulations, TSA’s security directives and requirements, the Mass Transit Modal Annex, the National Infrastructure Protection Plan, the National Incident Management System, and other related documents.

To determine TSA’s role in assisting passenger rail stakeholders to prepare for and respond to emergencies, we interviewed personnel from TSA’s Office of Transportation Security Network Management, the Office of Security Training and Exercise Coordination, the Office of Security Operations, and Surface Transportation Security Inspection Program Offices.

To gain an understanding of TSA’s interactions at the local level, we interviewed passenger rail stakeholder emergency management personnel and fire department personnel. We interviewed Federal Transit Administration and Federal Railroad Administration personnel at Department of Transportation headquarters to determine the level of coordination between TSA and the Department of Transportation on emergency preparedness and response efforts.

We interviewed officials and reviewed documents at TSA headquarters, as well as federal, state, and local passenger rail stakeholders in Washington, DC; Philadelphia; Los Angeles; and New York.

To comprehend standard emergency operational procedures on a local level, we also toured Office of Emergency Management facilities, passenger rail operational control centers, and a passenger rail emergency response training facility.

We observed TSA’s Intermodal Security Training and Exercise Program exercise in Los Angeles to determine the emphasis on emergency preparedness and response throughout these Table Top Exercises. We also attended two Connecting Communities training sessions; one held in Atlanta, GA and the other in Chicago, IL, to survey the emergency preparedness and response efforts made within the sessions.
Appendix A
Purpose, Scope, and Methodology

We conducted this performance audit between April and August 2009 under the authority of the Inspector General Act of 1978, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
Appendix B
Management Comments to the Draft Report

INFORMATION

MEMORANDUM FOR: Richard L. Skinner
Inspector General
U.S. Department of Homeland Security (DHS)

FROM: Gale D. Rossides
Acting Administrator

SUBJECT: Transportation Security Administration’s (TSA) Response to
DHS’s Office of the Inspector General (OIG) Draft Report,
TSA’s Preparedness for Mass Transit and Passenger Rail Emergencies, January 2010 – FOR OFFICIAL USE ONLY (FOUO)

Purpose:
This memorandum constitutes the Transportation Security Administration’s (TSA) response to
the recommendations for Agency action as well as issues relating to both the substance and
overall presentation of the draft report, TSA’s Preparedness for Mass Transit and Passenger Rail Emergencies, January 2010 – FOR OFFICIAL USE ONLY (FOUO). This memorandum brings
current (as of the date of this memorandum) any references made by the report to ongoing,
developing, or maturing programs within TSA to ensure the integrity of any actions or decisions
premised on this review. We recognize that this report represents a snapshot of TSA initiatives
as of the time of its compilation, and TSA remains prepared to provide current program status at
any time in the future.

Background:
The methodology pursued in the reporting of this audit raised concerns expressed by TSA
officials from the outset. By focusing solely on TSA’s efforts that support emergency
preparedness in mass transit and passenger rail, the report’s findings and recommendations do
not account for the much broader responsibilities, programs, and resource investments by other
key Federal entities—the Federal Transit Administration (FTA) and Federal Railroad
Administration (FRA), both within the Department of Transportation (DOT), and the Federal
Emergency Management Agency (FEMA). While the report recognizes the existence of these
other Federal partners, it does not appropriately clarify their critical role in mass transit and passenger rail preparedness. TSA's focus primarily on terrorism prevention and immediate response to a threat or incident recognizes the broader role and means DOT and FEMA dedicate to general emergency preparedness and response and recovery. This approach also aligns with the statutory authorities and responsibilities of each of these Federal components while advancing specific responsibilities of DHS as defined by the Secretary – building stronger partnerships and securing transportation infrastructure.

Discussion:

Prior to responding to the Recommendations in the draft report, TSA wishes to specifically address several provisions of the draft report. First, the second full paragraph on page 3 most directly implicates the concern regarding the separation of authority and roles among OHS, DOT, and FEMA by concluding “passenger rail agencies and the first responders they rely on may not be adequately prepared to respond to emergencies or mitigate the consequences of emergency incidents.” By not accounting for the broader role and means DOT and FEMA dedicate to general emergency preparedness and response and recovery, this statement conveys an inaccurate and misleading impression.

Second, the draft report focuses primarily on just four programs, relegating to Appendix F limited descriptions of TSA components and other initiatives essential to TSA’s multi-faceted approach to enhancing security and emergency preparedness in mass transit and passenger rail. In both aspects, the draft report does not adequately convey the integration of these efforts in advancing TSA’s strategic security priorities. In brief summary, these priorities, which are based on the concepts addressed in the Mass Transit Annex to the Transportation Systems Sector Specific Plan, are discussed below and should be acknowledged in the report:

- **Expand Partnerships for Security Enhancement**: A proactive and continuous collaboration with senior executives, law enforcement chiefs, and security managers for mass transit and passenger rail agencies; State and local government officials, law enforcement, and emergency responders; and Federal partners to foster regional security coordination and to integrate the spectrum of available resources for enhanced deterrent and response capabilities.

- **Elevate the Security Baseline**: A continuous improvement process implemented through comprehensive security assessments conducted by TSA surface inspectors under the Baseline Assessment for Security Enhancement (BASE) program with collaborative follow-up action to address identified concerns. The results of these assessments inform risk mitigation priorities, security enhancement programs, resource allocations, and compilation and distribution of effective security practices.

- **Build Security Force Multipliers**: A persistent effort to expand informed, capable “eyes and ears” for security through targeted awards under the Transit Security Grant Program (TSGP), funded through FEMA appropriations. These grants support employee security training, anti-terrorism exercises, public awareness campaigns, and fielding specially trained...
and equipped anti-terrorism law enforcement teams and technological systems to enhance
detection and deterrent capabilities.

- **Lead Information Assurance**: Deliver timely, accurate intelligence and security
  information to officials in mass transit and passenger rail agencies and State and local
governments through multiple means, including joint classified intelligence and analysis
briefings, deployment of secure communications capabilities, and periodic dissemination of
TSA Mass Transit Security Awareness Messages.

- **Protect High Risk Assets and Systems**: Expanded and sustainable active deterrence
  achieved through coordinated, joint security operations and random security inspections;
  TSGP awards that focus on expanding operational capabilities in mass transit and passenger
  rail systems; planning and execution of Visible Intermodal Prevention and Response (VIPR)
  operations in mass transit and passenger rail systems; risk-based deployment of TSA-
certified explosives detection canine teams expand systems' deterrent and detection
  capabilities; and coordinated technology development and testing that focuses on enhancing
  capabilities, through flexibly applicable mobile and fixed technologies, to protect high-risk
  assets and systems, notably underwater tunnels and high-volume terminals and stations, and
to detect and deter terrorist activity and prevent attacks in the demanding transit
  environment.

Each program and initiative TSA pursues in mass transit and passenger rail security aims to
advance one or more of these priorities, which is not apparent from the summaries provided in
Appendix F of the draft report.

For example, the **Transit Safety & Security Roundtables**, held semi-annually through the joint
sponsorship of TSA, FTA, and FEMA, foster a national partnership with security and safety
professionals in mass transit and passenger rail and meet a DHS priority of expanded integration
by the Federal Government with local officials directly responsible for security, safety, and
emergency management. Representatives of TSA, FTA, and FEMA join with the responsible
law enforcement chiefs, security directors, and safety managers in the Nation's largest 50 mass
transit and passenger rail agencies and Amtrak in focused exchanges on threats to the mode and
effective handling of security and safety-related emergencies. In each session, the presentations
and discussions collectively address each of TSA's strategic security priorities.

Through the **International Working Group on Land Transport Security (IWGLTS)**, TSA
meets the DHS responsibility of building stronger international partnerships. As Chair of the
Group during 2008-09, TSA led a concerted multi-national effort to produce a compilation of
international smart security practices. To date, practices have been accepted and shared among
the participating countries in the areas of risk assessment, partnerships, technology, public
awareness, and mitigating consequences of an incident. As this effort progresses, TSA will share
the assembled international smart security practices with law enforcement and security
professionals in mass transit and passenger rail agencies across the U.S., advancing the strategic
security priorities of building security force multipliers, assuring information leadership, and
protecting high-risk assets and systems.
A key element of emergency preparedness is the capability to sustain prevention and response efforts in the face of security threats or incidents. Two operational programs focus on this critical objective. The Visible Intermodal Prevention and Response (VIPR) Program deploys varying force packages that may consist of Federal Air Marshals, Behavior Detection Officers, Transportation Security Inspectors (TSIs), Transportation Security Officers, explosives detection canine teams, Explosives Security Specialists, and necessary supporting equipment. With these elements, TSA provides a range of capabilities to augment detection and deterrence in mass transit and passenger rail, including surveillance detection, behavior observation, mobile explosives trace detection for random bag inspections, explosives detection canine teams, specialization to resolve suspected explosive devices, and other visible, random, and unpredictable security activities. During 2009, TSA conducted more than 1,050 VIPR operations with mass transit and passenger rail systems across the Nation.

The second operational program meets three of TSA’s strategic security priorities by expanding partnerships, building security force multipliers, and enhancing means and capabilities to protect assets and systems. The Bomb Squad Response to Transportation Systems—Mass Transit integrates State and local authorities with mass transit and passenger rail systems operating in their jurisdictions through training and practical exercises. Bomb squads from local and State police departments and city, county, and State emergency management agencies receive training on the challenges of the mass transit and passenger rail operating environment and participate in response exercises involving improvised explosive devices on trains and buses and in stations. The cooperative relationships fostered through this program provide a foundation for expanded and sustained collaboration by the transit or rail agency with its local law enforcement and emergency management partners in security enhancement activities. Through January 2010, this program has been conducted in the Greater Cleveland Regional Transit Authority (September 2008); King County Metro Transit in the Seattle area (March 2009); San Diego Metropolitan Transit System (May 2009); the Denver Regional Transportation District (August 2009); and the Washington Metropolitan Area Transit Authority (January 2010). Interest in this program among transit and rail agencies and law enforcement partners in their service areas is high. Eight to 10 iterations are projected for 2010.

The Field Operational Risk and Criticality Evaluation (FORCE), also referenced in Appendix F, assesses a rail or transit system’s operations and facilities in the context of an area’s broader transportation network and neighboring critical infrastructure. Particular attention is devoted to analyzing potential high-consequence vulnerabilities and proposing attainable security solutions. The resulting report provides a thorough framework for integrated effort among the rail or transit agency and its local, State, and Federal partners to enhance preparedness, in a sustainable manner, for both the prevention and response missions. Five of these assessments have been completed to date – Port Authority of Allegheny County, Pittsburgh, PA (in advance of the G-20 Summit); Hampton Roads Transit, greater Norfolk-Hampton area, VA (in preparation for initiation of opening of a new light rail system); King County Metro Transit and connecting and neighboring systems in the greater Seattle, WA, metropolitan area (broad assessment in advance of the 2010 Winter Olympics in nearby Vancouver, British Columbia, Canada); Los Angeles Metropolitan Transportation Authority (in support of security preparations for the Rose Bowl); and Miami-Dade Transit (in support of...
security preparations for the Super Bowl). TSA will implement this program in partnership with several more transit and rail agencies during 2010.

In some cases, the draft report’s more focused treatment of four TSA programs relating to emergency preparedness in mass transit and passenger rail omits key elements and does not discuss the broader strategic context in which they are developed and implemented.

- On pages 5-6, the report comments critically on the Baseline Assessment for Security Enhancement (BASE) program, without providing essential context to assure understanding of its purpose and effectiveness. With the BASE program, TSA has implemented a continuous improvement process via comprehensive security assessments conducted by TSIs-Surface. The assessments evaluate posture in 17 Security and Emergency Management Action Items foundational to an effective security program, covering such areas as security program management and accountability, security and emergency response training, drills and exercises, public awareness, protective measures for Homeland Security Advisory System (HSAS) threat levels, physical security, personnel security, and information sharing and security. TSA pays particular attention to transit agency posture in six fundamental areas: protection of high-risk underwater/underground assets and systems; protection of other high-risk assets that have been identified through system-wide risk assessments; use of visible, unpredictable deterrence; targeted counter-terrorism training for key frontline staff; emergency preparedness drills and exercises; and public awareness and preparedness campaigns. A dedicated quality control lead at TSA Headquarters reviews all BASE assessment reports to ensure they accord with set standards and are supported by relevant accompanying documentation and justifications.

  o With regard to the report’s comments on training of TSIs-Surface, it is important to note that the 7.5 hours focused on the BASE program in the basic training curriculum is augmented by on-the-job experience conveyed by senior ranking inspectors and the in-depth quality review accomplished at TSA Headquarters that integrates the TSIs who performed the assessment in the process. The specialized surface security training under development will be 40 hours in length, with a significant portion (8-12 hours) dedicated to more in-depth BASE training.

  o The strategic objective of the BASE program is twofold – elevate performance in security and emergency management to a high standard among at-risk agencies and reduce risk scores through continuing assessments and follow-up security support actions to improve performance. The BASE assessment results inform the setting of risk mitigation priorities, facilitate review of agencies applications for awards under the TSGP, and drive development and implementation of security enhancement programs and initiatives, notably in such critical areas as security training, terrorism prevention exercises, and expanded anti-terrorism operational capabilities.

  o A significant omission in the draft report’s discussion of the BASE program is the compilation of Smart Security Practices produced from the assessment results.
During their conduct of the assessments, TSIs-Surface cite and summarize the most effective security practices they observe. With the December 2009 update, the compilation now consists of some 80 Smart Security Practices, many of which focus on regional partnerships; random security patrols, sweeps, and surges; intelligence and security information sharing; and training and public awareness. TSA coordinated the preparation of this product with each agency with one or more practices recognized in a BASE assessment, ensuring an accurate description of the practice and securing contact information for an official in the agency that professional colleagues may consult for more information. The compilation is distributed to law enforcement chiefs and security directors of mass transit and passenger rail agencies nationally, and fosters communication among security professionals with the specific objective of expanding adoption of these most effective practices, tailored as necessary to each agency's operating environment.

- On pages 7-8, the report discusses the “Training Matrix and Course List,” referencing the Implementing Recommendations of the 9/11 Commission Act of 2007 without providing context on TSA’s efforts to expand the scope and quality of security training in mass transit and passenger rail. When the initial BASE assessment results demonstrated a need to improve in recurring security training of employees, TSA developed and implemented a focused security training initiative under the TSGP in February 2007, details of which may be accessed at http://www.tsa.gov/assets/pdf/TSGP_Training_IB243.pdf. TSA coordinated development of this initiative through the Mass Transit Sector Coordinating Council, formed under the National Infrastructure Protection Plan (NIPP), and the Transit Policing and Security Peer Advisory Group.

- The Mass Transit Security Training Program provides guidelines to mass transit and passenger rail agencies on the types of training to be provided by category of employee, encompassing frontline employees, management, and law enforcement and security officers. The guidance further identifies specific courses developed under Federal auspices through FTA, FEMA, and TSA that are available to ensure employees are trained in the designated areas. Finally, DHS revised the eligible costs under the TSGP to allow coverage of overtime expenses incurred when employees attend training courses and streamlined the application process to simplify requests and expedite awards for security training.

- Collectively, these program enhancements produced a dramatic increase in the investment of grant funding in security training, with tens of thousands of frontline employees receiving current courses in such areas as security awareness, behavior recognition, and immediate actions to respond to a threat or security incident. We anticipate the future regulatory requirement will focus security training of frontline employees on these three core areas.
The limited discussion of the Intermodal Security Training and Exercise Program (I-STEP) on pages 8-9 of the report omits I-STEP’s vital role in advancing TSA’s strategic security priorities. While BASE assessment results indicated a significant volume of activity in this area, they also revealed insufficient conduct of exercises aimed at enhancing capabilities to address a developing threat and prevent a terrorist attack in mass transit and passenger rail. Existing DHS programs seemed to focus almost exclusively on response actions and capabilities. TSA developed the I-STEP application in mass transit and passenger rail specifically to fill this gap in exercise programs for the mode.

The report’s reference to “only three I-STEP sessions in the past 2 years” compared to “40 Port-STEP exercises in 2 years” conveys a misleading impression without the necessary, additional context demonstrating the distinctive attributes of how this program is implemented in mass transit and passenger rail. First, the I-STEP application in mass transit and passenger rail dates only from the initiation of the pilot effort in the National Capital Region in January 2008. Second, as demonstrated in the pilot and subsequent applications, I-STEP in mass transit and passenger rail dedicates substantial time and effort to enhancing regional collaboration and building integrated preventive capabilities. Over a period of months, TSA employs multi-phased workshops, table-top exercise, and “lessons learned” working groups to integrate mass transit and passenger rail agencies with regional law enforcement and emergency response partners to expand and enhance coordinated deterrent and incident management capabilities. Scenario-based anti-terrorism workshops conducted over a period of weeks to months integrate a region’s principal mass transit and passenger rail agencies with local, state, and Federal security partners, including law enforcement and first response agencies. The joint effort culminates in a large-scale regional table top exercise. Focused after action working groups address lessons learned to produce collaborative regional security enhancement efforts, a key step in both elevating and sustaining preparedness.

Finally, the “Conclusion” section on pages 9-10 illustrates the narrow scope of the audit and the breadth of its conclusions.

As stated above, because the report does not account for the responsibilities, programs, and resource investments by the two other key Federal entities in the emergency preparedness mission, DOT and FEMA, there is an incomplete analysis of the subject area, which incorrectly conveys the impression that TSA is the lead and solely responsible entity. TSA’s focus primarily on terrorism prevention and immediate response recognizes the broader role and means DOT and FEMA dedicate to general emergency preparedness and response and recovery. This approach aligns with the statutory authorities and responsibilities of each of these Federal components and meets the DHS responsibilities of building stronger partnerships and securing transportation infrastructure.
Appendix B
Management Comments to the Draft Report

As TSA is not the lead or solely responsible entity for emergency preparedness in mass transit and passenger rail, the statement that “insufficient funding and resources provided to emergency response workshops prevent TSA from ensuring that key stakeholders are ready to handle emergency events” overstates the agency’s role. TSA’s mission does not encompass all types of emergency events. Other Federal components, most notably DOT and FEMA, have responsibilities encompassing emergency preparedness and management generally. Additionally, exercises in mass transit and passenger rail are funded by FEMA through the TSGP. I-STEP focuses on building integrated prevention and immediate response capabilities.

Finally, the conclusion that “TSA has not provided enough training, including live field drills, with first responders well represented, passenger rail employees and the first responders they rely on may not be prepared to respond to emergency incidents in their systems” both understates TSA’s efforts in security training and overstates TSA’s mission responsibilities. Since fiscal year (FY) 2006, TSA has worked in conjunction with FEMA to award more than $83 million under the TSGP that has funded security training for more than 158,000 participants in mass transit and passenger rail systems. DOT and FEMA provide emergency response and preparedness training to transit and rail employees and first responders for non-terrorism related incidents.

Conclusion:
TSA appreciates the opportunity to comment on the draft report and the professionalism demonstrated by the OIG team, in particular Andrew Smith, in conducting the review. TSA has demonstrated an effective strategy and implemented comprehensive efforts to improve the security of mass transit and passenger rail systems. TSA focuses primarily on terrorism prevention and immediate response to a threat or incident while supporting the leading role of FEMA and DOT in more general emergency preparedness and response and recovery efforts. Despite the concerns discussed above, TSA concurs with each of the report’s recommendations. TSA’s responses to the specific recommendations are attached.
United States Department of Homeland Security
Transportation Security Administration

Response to Draft Recommendations
TSA’s Preparedness for Mass Transit and Passenger Rail Emergencies

Recommendation #1: Improve the Baseline Assessment for Security Enhancement program by (a) expediting the process to develop and implement the new database tool to ensure that the assessments effectively capture consistent and objective data; and (b) ensuring more comprehensive and recurring BASE assessment training for TSIs to ensure consistent, effective, and objective data gathering.

TSA Concurs: The TSA Office of Compliance is in the process of developing a 40-hour surface transportation specialty training program at TSA’s surface transportation training center in Pueblo, CO, that will incorporate an additional 8-12 hours of in-depth BASE program training for TSIs-Surface. This training will also include the application of the automated BASE assessment tool that has been developed to enhance efficiency of data collection, integration, and analysis.

Recommendation #2: Improve the emergency preparedness workshops, such as Connecting Communities workshops, by (a) increasing coordination with the Federal Transit Administration to ensure compliance with the Memorandum of Understanding, and (b) providing financial support to increase the number of sessions held annually.

TSA Concurs: A flexible approach, adaptable to changing circumstances, should be maintained in efforts to enhance security and emergency preparedness. As opposed to citing a particular program, TSA concurs with providing increased support to efforts to expand and enhance emergency preparedness in mass transit and passenger rail systems in a coordinated effort with regional law enforcement, first responders, State and local officials, and Federal partners.

Recommendation #3: Improve the Training Matrix and Recommended Courses List in the Transportation Security Grant Program by (a) ensuring that the Transportation Security Administration coordinates and communicates with passenger rail stakeholders when developing the new list, and (b) increasing the number of emergency preparedness and response courses focused on mass transit and passenger rail systems and the threats posed by improvised explosive devices.

TSA Concurs: TSA is working to develop a more comprehensive training matrix that identifies types of training across the spectrum of prevention, continuity of operations, response, post-event recovery, and restoration to normal service. Further, the matrix will identify categories of employees (such as frontline, station managers, maintenance, track workers, and bus operators) and training specific to those groups, as well as general baseline training that should be provided to mass transit and passenger rail employees generally. Particular emphasis will be placed on training to recognize, report, and respond effectively to suspected or confirmed improvised explosive devices. This effort will be conducted with the participation of FTA and FEMA, recognizing the broader roles and responsibilities these organizations have in this area. As with
other initiatives, input will be sought from mass training and passenger rail security partners on training they see as critical to secure their facilities and on the content and format of the updated matrix. Of particular relevance to this collaborative effort, TSA partnered with FEMA to provide language for a FY 2010 $5M DHS grant for surface transportation and emergency preparedness response training courses focusing on the awareness of and the threats posed by improvised explosive devices.

Recommendation #4: Strengthen the Intermodal-Security Training and Exercise Program by (a) increasing the number of full-time employees in the Mass Transit Division, (b) expediting delivery of an increased number of Intermodal-Security Training and Exercise Program sessions to passenger rail stakeholders, (c) increasing the number of firefighters participating in the sessions, and (d) incorporating live, realistic field drills and exercises into the Intermodal-Security Training and Exercise Program sessions.

TSA Concurs: The Mass Transit Division is in the process of hiring a dedicated transportation security specialist to work for the director of security training and exercise programs in I-STEP and related efforts. Four to six iterations of I-STEP are currently projected for calendar year 2010. TSA is considering integrating live elements into I-STEP. Additionally, TSA envisions using the surface transportation training center, scheduled to open in Pueblo, CO, in April 2010, to help expand conduct of live exercises focused on terrorism prevention and response in mass transit and passenger rail. The capabilities projected for the training center will allow for increased participation of law enforcement officers, firefighters, and other emergency responders, with Federal security partners, as well as the incorporation of live, realistic field drills and exercises.
Appendix C
Average Daily Trips per Region in 2007

Our Nation’s passenger rail network is critical to our way of life, transporting more than 12 million commuters each day. The top eight regions transport more than 9 million passenger rail commuters each day, as shown below.

<table>
<thead>
<tr>
<th>Regional trips as Percentage of National Total</th>
<th>Top Eight Regions</th>
</tr>
</thead>
<tbody>
<tr>
<td>6,088,210 (51%)</td>
<td>New York–New Jersey</td>
</tr>
<tr>
<td>834,042 (7%)</td>
<td>Virginia–District of Columbia–Maryland</td>
</tr>
<tr>
<td>736,387 (6%)</td>
<td>Boston</td>
</tr>
<tr>
<td>732,146 (6%)</td>
<td>Chicago</td>
</tr>
<tr>
<td>566,332 (5%)</td>
<td>San Francisco</td>
</tr>
<tr>
<td>420,793 (4%)</td>
<td>Philadelphia</td>
</tr>
<tr>
<td>354,489 (3%)</td>
<td>Los Angeles</td>
</tr>
<tr>
<td>189,613 (3%)</td>
<td>Atlanta</td>
</tr>
</tbody>
</table>

Source: American Public Transportation Association, 2009
In 2004, TSA issued two Security Directives requiring passenger rail agencies to increase security operations, including assigning security coordinators, conducting frequent inspections of facilities and vehicles for items that do not belong, and requiring them to immediately report any suspicious activity to TSA. Recently, TSA issued a third directive requiring passenger rail agencies to allow TSA inspectors to enter and conduct inspections, as well as provide for a secure chain of custody and control of rail cars containing a specified quantity and type of hazardous material.

In 2007, TSA published *Transportation Systems – Critical Infrastructure and Key Resources Sector-Specific Plan as Input to the National Infrastructure Protection Plan*, which includes the *Mass Transit Modal Annex*. These documents describe how the transportation sector will improve the security of its critical infrastructure and key resource assets, systems, networks, and functions. The *Mass Transit Modal Annex* focuses on the Six Transit Security Fundamentals that provide the foundation for a successful security program. (See figure below.)

<table>
<thead>
<tr>
<th>TSA’s Six Transit Security Fundamentals</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Protection of high-risk underwater/underground assets and systems</td>
</tr>
<tr>
<td>2. Protection of other high-risk assets that have been identified through system-wide risk assessments</td>
</tr>
<tr>
<td>3. Use of visible, unpredictable deterrence</td>
</tr>
<tr>
<td>4. Targeted counterterrorism training for key frontline staff</td>
</tr>
<tr>
<td>5. Emergency preparedness drills and exercises</td>
</tr>
<tr>
<td>6. Public awareness and preparedness campaigns.</td>
</tr>
</tbody>
</table>

Source: TSA

On November 26, 2008, TSA issued a final rule to enhance the security of our Nation's rail transportation system, which included requirements for intercity, commuter, and short-haul passenger train service providers and rail transit systems. The rule codifies the scope of TSA's existing inspection program and requires regulated parties to allow TSA and DHS officials to enter, inspect,
and test property, facilities, conveyances, and records relevant to rail security. The rule requires that regulated parties designate rail security coordinators and report significant security concerns. The rule further requires that freight rail carriers and certain facilities handling specified hazardous materials be able to report location and shipping information to TSA upon request and implement chain of custody requirements to ensure positive and secure exchange of specified hazardous materials.

2. Define roles and responsibilities for security and emergency management.

3. Ensure that operations and maintenance supervisors, forepersons, and managers are held accountable for security issues under their control.

4. Coordinate Security and Emergency Management Plan(s) with local and regional agencies.

5. Establish and maintain a security and emergency training program.

6. Establish plans and protocols to respond to the DHS Homeland Security Advisory System threat levels.

7. Implement and reinforce a public security and emergency awareness program.

8. Conduct Table Top and Functional drills.

9. Establish and use a risk management process to assess and manage threats, vulnerabilities, and consequences.


11. Establish and use a reporting process for suspicious activity (internal and external).

12. Control access to security-critical facilities with identification badges for all visitors, employees, and contractors.

13. Conduct physical security inspections.

14. Conduct background investigations of employees and contractors.

15. Control access to documents of security-critical systems and facilities.

16. Implement a process for handling and access to sensitive security information.

17. Conduct security program audits.
Within TSA, the following components focus on meeting the goals and objectives of the Transportation Security – Sector Specific Plan:

- **The Office of Transportation Sector Network Management** leads the unified national effort to protect and secure the Nation’s intermodal transportation systems. Its primary mission is to ensure the safe movement of passengers and promote the free flow of commerce by building a resilient, robust, and sustainable network with the public and private sector partners, including passenger rail stakeholders.

- **The Mass Transit Division** coordinates drills, training, exercises, and public outreach regarding mass transit and passenger rail security and emergency management. This includes coordination of the Intermodal Security Training and Exercise Program, National Roundtables with mass transit and passenger rail security leadership, and development of new and improved training courses and curriculum in the Transportation Security Grant Program.

- **The Port and Intermodal Security Division** was established to develop and deliver the Port Security Exercise and Training Program, which provides exercise and evaluation services and solutions for maritime and surface industry partners. TSA developed the Intermodal Security Training and Exercise Program to support the Nation’s surface transportation sector by evaluating its capabilities to prevent, prepare for, and respond to terrorist-related incidents.

- **TSA’s Office of Security Operations** is responsible for special programs designed to secure all assigned transportation modes. The Office of Security Operations manages the Surface Transportation Security Inspections Program, Surface Transportation Security Inspectors, and the BASE program.
There are other TSA programs that support preparedness for emergencies in public transportation, but we did not review these programs in detail. Other related TSA initiatives include:

- **Visible Intermodal Prevention and Response Program** - TSA deploys teams to augment security in mass transit and passenger rail systems, expanding capabilities to implement random, unpredictable security activities for deterrent effect. Through a joint planning process between TSA, the transit or rail agency’s law enforcement and security team, and local law enforcement officials, the Visible Intermodal Prevention and Response teams’ composition and activities are tailored to the needs of the participating system.

- **Transit Safety and Security Roundtables** - Twice each year, TSA and the Federal Transit Administration jointly sponsor Transit Safety and Security Roundtables, which bring together law enforcement chiefs, security directors, and safety directors from the nation's 50 largest mass transit and passenger rail agencies and Amtrak with federal security partners. In a workshop format, the participants discuss specific terrorism prevention and response challenges and work collaboratively in developing effective risk mitigation, security enhancement, and emergency preparedness solutions. The roundtables enable the transit and rail agencies' safety and security officials to share effective practices and develop relationships to improve coordination and collaboration.

- **The International Working Group on Land Transport Security** - A collaborative forum for government officials responsible for surface transportation security, in particular mass transit and passenger rail security, to share best practices and lessons learned relevant to prevention, response, and recovery. The composition of the working group includes representatives from Australia, Canada, the European Union, France, Germany, India, Indonesia, Japan, Italy, Russia, Spain, the United Kingdom, the Republic of Korea, Malaysia, Israel, China, and the United States.
- **Bomb Squad Response to Transportation Systems-Mass Transit** - This program expands regional capabilities to respond to a threat or incident involving a suspected explosive device in mass transit and passenger rail systems. Bomb technicians from law enforcement agencies in the system's operating area are placed in the mass transit or passenger rail environment to confront exercise situations necessitating coordinated planning and execution of operations to identify, resolve, and, if appropriate, render harmless improvised explosive devices. These joint activities build relationships and skills in a challenging operational setting.

- **Field Operational Risk and Criticality Evaluation** – Field operational risk assessments complement the BASE assessment process. This program was developed to help identify potential gaps in operational security within the transit or rail system and vulnerabilities derived from regional dependencies and interconnections and nearby infrastructure. The overall objective of this program is to enable more effective application of resources to maximize prevention and response capabilities.
# Appendix G

## TSA Component and Workflow Diagram

<table>
<thead>
<tr>
<th>Initiatives</th>
<th>1. BASE Assessments</th>
<th>2. Connecting Communities</th>
<th>3. Training Matrix and Course Lists</th>
<th>4. I-STEP Table Top Exercises</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ownership</td>
<td>TSA’s Office of Security Operations</td>
<td>Joint between TSA and Department of Transportation’s Federal Transit Administration based on the Memorandum of Understanding</td>
<td>Joint between TSA and FEMA within the Transportation Security Grant Program</td>
<td>Joint between TSA’s Office of Security Training &amp; Exercise Coordination and the Port and Intermodal Security Division</td>
</tr>
</tbody>
</table>
| Purpose     | - To determine security baseline and find gaps to be addressed in passenger rail systems.  
- Help determine required preparatory training and workshops to prepare identified passenger rail stakeholders to attend the I-STEP Table Top Exercises | - To coordinate the assets and specialized resources of transit and transportation systems, with their local, county, and state response and emergency management agencies, including law enforcement, fire fighters, and emergency medical services.  
- To develop and issue regulations for training programs to prepare railroad frontline employees for potential security threats and conditions. | - To establish a program for conducting security exercises for railroad carriers, emergency response providers, law enforcement, and railroad and transit police to prevent, prepare for, mitigate, and respond to and recover from acts of terrorism.  
- Exercises should be live and as realistic as possible. |
| Problems    | - BASE Assessment tool is subjective;  
- Transportation Security Inspectors are not adequately trained to conduct the BASE Assessments or effectively implement the BASE tool.  
- Inadequate number of Connecting Communities workshops conducted  
- Lack of attendance by key participants, including fire fighters and state Office of Emergency Management personnel | - Training not sufficiently focused on emergency preparedness and response for passenger rail agencies and stakeholders, including employees and fire fighters  
- Limited number of courses focused on response to incidents involving an improvised explosive device. | - Inadequate number of I-STEP sessions being conducted  
- I-STEP sessions not including an adequate number of fire fighters  
- I-STEP only consists of a table top exercise and does not include a live realistic field drill component. |

**Intermodal Security Training Exercise Program** encompasses all of these programs and processes to complete an I-STEP Table Top Exercise.
Appendix H
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Appendix I
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