



November 2019

SURFACE TRANSPORTATION

TSA Should Improve Coordination Procedures for Its Security Training Program

Accessible Version

GAO Highlights

Highlights of [GAO-20-185](#), a report to congressional committees

View [GAO-20-185](#). For more information, contact William Russell at (202) 512-8777 or RussellW@gao.gov.

November 2019

SURFACE TRANSPORTATION

TSA Should Improve Coordination Procedures for Its Security Training Program

Why GAO Did This Study

The global terrorist threat to surface transportation—freight and passenger rail, mass transit, highway, maritime and pipeline systems—has increased in recent years, as demonstrated by a 2016 thwarted attack on mass transit in New Jersey and the 2017 London vehicle attacks. TSA is the primary federal agency responsible for securing surface transportation in the United States.

The FAA Reauthorization Act of 2018 includes a provision that GAO review resources provided to TSA surface transportation programs and the coordination between relevant entities related to surface transportation security. This report addresses TSA's: (1) allocation of resources to surface transportation programs for fiscal years 2017 and 2018; and (2) coordination within TSA to implement the Intermodal Security Training and Exercise Program. GAO analyzed TSA data on surface program resources for fiscal years 2017 and 2018, reviewed TSA program guidance, and interviewed TSA officials responsible for implementing the Intermodal Security Training and Exercise Program. This program is intended to assist transportation operators and others in enhancing security through exercises and training.

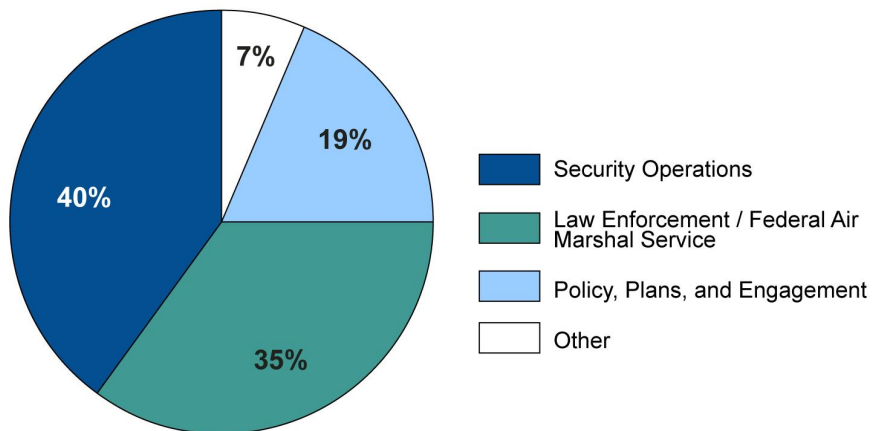
What GAO Recommends

GAO recommends that TSA clarify roles and responsibilities for all offices involved in the coordination of surface transportation exercises, including when these offices are to coordinate. DHS concurred with the recommendation.

What GAO Found

Transportation Security Administration (TSA) reported allocating most of its surface transportation program account, which was \$123 million in fiscal year 2017 and \$129 million in fiscal year 2018—to three offices (see figure). The surface program account represented about 1.6 percent of the agency's appropriation in both fiscal years, according to Department of Homeland Security data.

Percentage of Transportation Security Administration's Surface Transportation Account by Office, Fiscal Year 2018



Source: GAO analysis of Department of Homeland Security data. | GAO-20-185

Note: Percentages may not sum to 100 percent due to rounding.

Security Operations is to conduct regulatory inspections for freight and passenger rail systems, non-regulatory security assessments, and voluntary training. Law Enforcement/Federal Air Marshal Service is to administer the Visible Intermodal Prevention and Response (VIPR) Program to augment the security of and promote confidence in surface transportation systems. Policy, Plans, and Engagement (PPE) is to develop and coordinate security policies, programs, directives, strategies, and initiatives, while overseeing industry engagement. In fiscal years 2017 through 2019, TSA reported using surface program resources for non-surface activities. For example, in fiscal year 2018, TSA reprogrammed \$5 million from the Surface Programs account to the Mission Support account to address security requirements and increase hiring of transportation security officers. In that same year, about 39 percent of VIPR operations were conducted in aviation security.

TSA has not fully identified coordination roles and responsibilities for its training and exercise program for offices outside of PPE—the office with primary responsibility for the program. PPE coordinates with several other offices to accomplish the program's goals, including the Intelligence and Analysis (I&A) office that provides intelligence briefings that give background context during program exercises. I&A officials explained that while they have supported exercise planning, there is no formal role for the office in the procedure or expected time frames for providing information. As a result, I&A officials stated that they do not typically participate in the PPE planning meetings because they are not consistently invited to attend. In the absence of a policy that clearly defines all current offices that should coordinate and when, PPE may be missing consistent input and important information from relevant offices across TSA.

Contents

GAO Highlights		2
	Why GAO Did This Study	2
	What GAO Recommends	2
	What GAO Found	2
Letter		1
	Background	4
	TSA Allocated Most Surface Program Resources to Three Offices, and Some Were Used for Non-Surface Activities in Fiscal Years 2017 and 2018	7
	TSA's Guidance for Its Training and Exercise Program Does Not Fully Establish Coordination Procedures and Time Frames	11
	Conclusion	13
	Recommendation for Executive Action	13
	Agency Comments and Our Evaluation	14
Appendix I: Comments from the Department of Homeland Security		16
	Text of Appendix I: Comments from the Department of Homeland Security	19
Appendix II: GAO Contact and Staff Acknowledgments		21
	GAO Contact	21
	Staff Acknowledgments	21
Tables		
	Table 1: Surface Transportation Modes and Select Entities that Partner with the Transportation Security Administration	4
	Table 2: Surface Program Account Dollar and Staff Allocation within Transportation Security Administration (TSA) Offices, Fiscal Years 2017 and 2018	9

Figure

Figure 1: Percentage of Transportation Security Administration's
(TSA) Appropriation Directed to Surface Programs
Account, Fiscal Year 2018

6

Abbreviations

DHS	Department of Homeland Security
I&A	Intelligence and Analysis
I-STEP	Intermodal Security Training and Exercise Program
LE/FAMS	Law Enforcement/Federal Air Marshal Service
PPE	Policy, Plans, and Engagement
SO	Security Operations
TSA	Transportation Security Administration
VIPR	Visible Intermodal Prevention and Response

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



November 20, 2019

Congressional Committees

The global terrorist threat to surface transportation—freight and passenger rail, mass transit, highway, maritime, and pipeline—has increased in recent years, as demonstrated by an attempted attack on mass transit in New Jersey in 2016 and the 2017 London vehicle attacks.¹ Surface transportation systems generally rely on an open infrastructure that can be difficult to monitor and secure due to its multiple access points and lack of access barriers. Securing these modes can be further complicated by the number of private and public stakeholders involved in operating and protecting them and the need to balance security with the expeditious flow of people and goods.

Within the federal government, the Department of Homeland Security’s (DHS) Transportation Security Administration (TSA) is the primary entity responsible for securing surface transportation modes. TSA’s surface domain includes nearly 140,000 miles of railroad track, over 2.7 million miles of pipeline, and 4 million miles of roads. There are 10 billion annual passenger trips on mass transit systems, including 25 million students on school buses each day. TSA’s domain also includes nearly 800,000 daily shipments of hazardous materials. TSA receives funding each fiscal year to protect the surface transportation modes and allocates these resources to support programs and personnel.

We previously reported that TSA’s role in surface transportation security varies by mode.² Unlike the aviation environment where TSA has operational responsibility for screening passengers and baggage, TSA has a limited operational role for securing surface transportation systems.³ TSA mainly provides guidance and encourages voluntary

¹There have been multiple thwarted attacks against New York mass transit, including undetonated explosives that were found in a trash receptacle near a mass transit station in Elizabeth, New Jersey on September 18, 2016. Vehicle attacks occurred in London, England in the United Kingdom on March 22 and June 3, 2017.

²We have previously reviewed TSA surface inspector activities. GAO, *Transportation Security Administration: Surface Transportation Inspector Activities Should Align More Closely With Identified Risks*, [GAO-18-180](#) (Washington, D.C.: Dec. 14, 2017).

³In some instances, TSA partners with mass transit operators through the Visible Intermodal Prevention and Response program to augment high visibility patrols with mass transit operators as a force multiplier.

implementation of security best practices to surface transportation entities, and relies on cooperation from system operators, and local, state, and federal security partners. For example, TSA engages with system operators and governmental security partners through its voluntary Intermodal Security Training and Exercise Program (I-STEP) to enhance surface transportation security. In addition, TSA plays a regulatory role in passenger and freight rail through inspections to ensure operators are complying with regulatory requirements.⁴

The FAA Reauthorization Act of 2018 included a provision for us to review TSA's surface transportation resources and coordination between relevant entities related to surface transportation.⁵ This report examines (1) TSA's allocation of resources to surface transportation programs for fiscal years 2017 and 2018, and (2) coordination within TSA to implement I-STEP.

We analyzed data from TSA to determine how TSA allocated surface transportation resources in fiscal years 2017 and 2018. Specifically, we obtained and reviewed TSA's budget and staffing data from the Surface Programs account, the primary account used to fund surface transportation programs. In addition, we reviewed documentation, such as program guidance, and interviewed TSA officials to understand each relevant TSA office's role in surface transportation, such as the activities they carried out. We also interviewed TSA officials and reviewed documentation to identify resources that were reprogrammed or transferred into or away from the Surface Programs account from October 1, 2016 through July 26, 2019, the most recent information available. We analyzed data from TSA's Activity Summary Report Database for fiscal years 2017 and 2018 to identify the percentage of operations Law Enforcement/Federal Air Marshal Service's Visible Intermodal Prevention and Response Program funded from the Surface Programs account conducted in surface and aviation modes. We also analyzed data from TSA's Performance and Results Information System for fiscal year 2018, the first full year available, to identify the percentage of time surface inspectors reported spending on activities by transportation mode, including aviation.

⁴See 49 C.F.R. part 1580.

⁵Pub. L. No. 115-254, § 1966, 132 Stat. 3186, 3607.

We assessed the reliability of TSA's budget and staff data by corroborating the figures provided to those available in DHS' congressional budget justifications and by reviewing responses to questionnaires sent to relevant TSA officials to understand the quality controls on the data they provided. We assessed the reliability of TSA's Activity Summary Report Database by reviewing the processes and controls that ensure the quality of data when entered. We assessed the reliability of TSA's Performance and Results Information System by reviewing prior testing of the data from this system and reviewing data collection processes and procedures that ensure data are entered accurately and completely. We determined that these data were sufficiently reliable for the purposes of this report.

To determine how well relevant entities within TSA coordinated to plan and implement I-STEP, we reviewed program planning and implementation guidance and interviewed officials from relevant offices. Specifically, we reviewed the TSA Internal Operating Procedure used to plan and implement I-STEP exercises and then compared the internal operating procedure to relevant federal control standards.⁶ We interviewed officials from PPE, the main office responsible for the program, to understand how they plan and implement I-STEP exercises, including the offices they coordinate with. Additionally, we interviewed TSA officials from offices responsible for assisting PPE in planning and implementing ISTEP, such as the office of Intelligence and Analysis, to understand their roles and responsibilities.

We conducted this performance audit from February 2019 to November 2019 in accordance with 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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

Background

Federal and Other Stakeholder Roles in Surface Transportation

The Aviation and Transportation Security Act designated TSA as the primary federal agency responsible for security in all modes of transportation.⁷ Public and private transportation entities have the principal responsibility to carry out safety and security measures for their services. As such, TSA coordinates with these entities to identify vulnerabilities, share intelligence information, and work to mitigate security risks to the transportation modes. See table 1 for examples of the entities TSA works with to secure the various surface transportation modes.

Table 1: Surface Transportation Modes and Select Entities that Partner with the Transportation Security Administration

Surface Transportation Modes	Examples of Types of Entities
Passenger rail/mass transit	Passenger rail systems Commuter rail systems Subway systems Mass transit bus companies
Freight rail	Class I railroads and other smaller freight railroads
Highway	School bus operators Trucking companies Over-the-road bus companies State Departments of Transportation
Pipeline	Natural gas and petroleum pipeline companies
Maritime	Maritime Transportation Security Act-regulated facilities, which participate in the Transportation Worker Identification Credential program ^a

Source: GAO Analysis of Transportation Security Administration Documents| GAO-20-185

Note: Passenger Rail/Mass Transit includes commuter rail, heavy rail, inter-city rail, and light rail; Class I railroad is defined by the U.S. Surface Transportation Board as a railroad company that earns adjusted annual revenue of \$319.3 million or more. An over-the-road motor bus is defined as a motor vehicle with an elevated passenger deck designed to seat more than 30 passengers atop a separate

⁷Pub. L. No. 107-71, § 101(a), 115 Stat. 597 (2001) (codified at 49 U.S.C. § 114(d)).

baggage area engaged in the transportation of passengers for inter-city, tour, and commuter services. An over-the-road motor bus excludes school and urban mass transit buses.

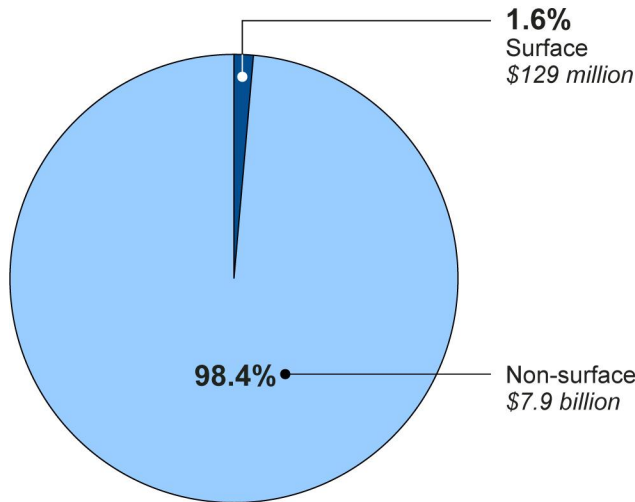
^aThe Transportation Worker Identification Credential program requires maritime workers to complete background checks and obtain biometric identification cards to gain unescorted access to secure areas of Maritime Transportation Security Act-regulated facilities. See 46 U.S.C. § 70105.

TSA's Surface Programs Account

TSA's Surface Programs' Program, Project, or Activity (Surface Programs account) supports TSA programs that are to protect the surface transportation system. According to DHS's Congressional Budget Justifications, this account received about \$113 million on average annually from fiscal years 2009 through 2018, about 1.5 percent of TSA's average annual appropriation of more than \$7 billion.⁸ During that time, the appropriations directed to the Surface Programs account ranged from about \$63 million to nearly \$135 million annually. For example, in fiscal year 2018, TSA's Surface Programs account received about \$129 million, which was less than 2 percent of TSA's appropriation (see figure 1). In addition, the Surface Programs account staff (full-time equivalents) ranged from 353 to 843 annually from fiscal years 2009 through 2018, consistently representing between 0.68 and 1.53 percent of TSA's total staff.

⁸Appropriations are reported in nominal dollars. In fiscal years 2017 and 2018, amounts do not include revisions such as transfers or reprogramming actions.

Figure 1: Percentage of Transportation Security Administration's (TSA) Appropriation Directed to Surface Programs Account, Fiscal Year 2018



Source: GAO analysis of Department of Homeland Security data. | GAO-20-185

TSA's Intermodal Security Training and Exercise Program

I-STEP was created in response to provisions in the Implementing Recommendations of the 9/11 Commission Act of 2007.⁹ According to PPE, the I-STEP program offers three main services:

- Exercise Management Services assist transportation operators, emergency responders, local law enforcement, and government officials in enhancing security preparedness and resilience;
- Training Support Services help partners improve security awareness, training gaps, security plans, emergency procedures, and incident management skills; and
- Security Planning Tools and Services help partners gain an understanding of transportation security lessons learned and best practices to inform risk-based decision-making.¹⁰

⁹6 U.S.C. §§ 1136, 1166, 1183.

The program conducts multi-agency, multi-jurisdictional activities ranging from seminars to full-scale exercises. Seminars provide a starting point for industry stakeholders developing or making major changes to their plans and procedures. Full-scale exercises deploy personnel and resources for real-time scripted events that focus on implementing and analyzing plans, policies, and procedures. The voluntary exercises are conducted across surface transportation modes including mass transit, passenger and freight rail, highway, and pipeline.¹¹

TSA Allocated Most Surface Program Resources to Three Offices, and Some Were Used for Non-Surface Activities in Fiscal Years 2017 and 2018

TSA's Surface Programs account received \$123 million in fiscal year 2017 and \$129 million in fiscal year 2018, according to DHS. Surface activities are primarily carried out by three TSA offices—Security Operations; Law Enforcement/Federal Air Marshal Service; and Policy, Plans, and Engagement. TSA reported that these offices were collectively allocated about 99 percent of the funding in TSA's Surface Programs account in fiscal year 2017 and 93 percent in fiscal year 2018.¹²

Security Operations (SO). This office is to provide risk-based security that includes regulatory compliance and other programs designed to secure transportation. Within SO, surface transportation security

¹⁰According to the I-STEP Development and Exercise manual, I-STEP has 16 program objectives, to include: Prevent and deter acts of terrorism using, or against, the transportation system; Enhance the all-hazard preparedness and resilience of transportation systems to safeguard U.S. national interests; Improve the effective use of resources for transportation security; and Improve sector situational awareness, understanding, and collaboration.

¹¹According to TSA officials, TSA conducts a few exercises in the aviation mode each year for general aviation airports or small airlines.

¹²In fiscal year 2017, TSA's offices of Civil Rights and Liberties, Ombudsman and Traveler Engagement; Public Affairs; Training and Development; and Chief Counsel also received funding from TSA's Surface Programs appropriation. In fiscal year 2018, TSA's offices of Requirements and Capabilities Analysis; Chief Counsel; Public Affairs; and Training and Development also received funding from TSA's Surface Programs appropriation. In addition, TSA's Intelligence and Analysis entities assist with surface transportation activities, but do not receive funding through the Surface Programs appropriation.

inspectors, known as surface inspectors, conduct a variety of activities to implement TSA's surface transportation security mission. These activities are to include (1) regulatory inspections for freight and passenger rail systems, (2) regulatory Transportation Worker Identification Credential inspections,¹³ and (3) non-regulatory security assessments and training which surface transportation entities participate in on a voluntary basis.

Law Enforcement/Federal Air Marshal Service (LE/FAMS). This office is to conduct protection, response, detection, and assessment activities in transportation systems. For example, LE/FAMS administers the Visible Intermodal Prevention and Response (VIPR) program. Since late 2005, TSA has deployed teams to conduct VIPR operations as a way to augment security of and promote confidence in surface transportation systems. These capabilities can include random bag searches and law enforcement patrols at mass transit and passenger rail systems to deter potential terrorist threats.

Policy, Plans, and Engagement (PPE). This office is to develop and coordinate both domestic and international multimodal transportation security policies, programs, directives, strategies and initiatives, while overseeing engagement with industry stakeholders and associations. For example, each modal section within PPE—mass transit, passenger and freight rail, highway, pipeline, and maritime—is to be responsible for outreach to their respective industry and with federal security partners. Their primary role is to align industry interests and actions with the TSA mission. The modes are to share intelligence and information with the industry to develop a shared understanding of risks, conduct vulnerability gap analysis, develop security policy, share best practices, provide risk mitigation and training tools, and conduct drills and exercises.

These TSA offices further allocate surface program resources within their respective offices to carry out surface transportation activities (see table 2). Within PPE's Surface Division, PPE reported allocating six Surface Program account staff to each surface transportation mode office— mass transit and passenger rail, freight rail, highway and motor carrier, and pipeline—in fiscal years 2017 and 2018.

¹³TSA's responsibilities include enrolling Transportation Worker Identification Credential applicants, conducting background checks to assess the individual's security threat, and issuing the credentials. In addition, TSA is authorized to conduct inspections of persons using the credentials to access the secured area of a regulated maritime facility. 49 C.F.R. § 1570.9.

Table 2: Surface Program Account Dollar and Staff Allocation within Transportation Security Administration (TSA) Offices, Fiscal Years 2017 and 2018

TSA Office	2017 Staffing^a	2017 Allocated Budget (Dollars in Thousands)	2018 Staffing^a	2018 Allocated Budget (Dollars in Thousands)
Security Operations	402	48,835	401	51,461
Compliance Division Surface Programs Headquarters	21	3,552	21	3,721
Compliance Division Surface Programs Field	252	31,011	251	33,400
Visible Intermodal Prevention and Response	129	14,272	129	14,340
Law Enforcement/Federal Air Marshal Service	230	45,382	233	45,408
Visible Intermodal Prevention and Response Federal Air Marshals	217	42,810	217	42,290
Visible Intermodal Prevention and Response Joint Coordination Center	13	2,572	16	3,118
Policy, Plans, and Engagement	114	26,970	116	23,992
Other^b	8	1,529	4	8,455
Total	754	122,716	754	129,316

Source: TSA data | GAO-20-185

Note: Budget figures have not been adjusted for inflation.

^aTSA staffing numbers are full-time equivalent positions.^bIn fiscal year 2017, other included: Civil Rights and Liberties, Ombudsman and Traveler Engagement; Public Affairs; Training and Development; and Chief Counsel. In fiscal year 2018, other included: Requirements and Capabilities Analysis; Chief Counsel; Public Affairs; and Training and Development.

TSA may realign funds within an appropriation account through reprogramming and also has limited authority to realign funds between appropriation accounts through transfers, pursuant to its appropriations

acts and subject to notification provisions.¹⁴ According to TSA officials, TSA reprogrammed or transferred the following surface transportation resources enacted from fiscal years 2017 through 2019:¹⁵

- In fiscal year 2018, TSA reprogrammed \$5 million from Surface Programs to Mission Support activities to address security requirements and increase hiring of transportation security officers. Transportation security officers conduct security screening of passengers, baggage, and cargo at airports to prevent any deadly or dangerous objects from being transported onto an aircraft.
- In fiscal year 2018, DHS transferred \$100,000 from the Surface Program account to (1) the Immigration and Customs Enforcement's Custody Operations account to provide adequate funding for detention beds, (2) Immigration and Customs Enforcement's Transportation Removal Program account to support transportation and removal activities for migrants, and (3) the U.S. Secret Service's Protection of Persons and Facilities account to support upgrading protections for the White House. In fiscal year 2019, DHS transferred over \$6 million to the Immigration and Customs Enforcement's Custody Operations and Transportation Removal Program accounts for the same purposes.
- In fiscal year 2019, TSA reprogrammed \$200,000 from Mission Support and Secure Flight to Surface Programs to ensure sufficient

¹⁴The Consolidated Appropriations Act, 2019, provides that DHS may not reprogram funding that (1) creates or eliminates a Program, Project, or Activity (PPA) or increases funds for any PPA for which funds have been denied or restricted by the Congress; (2) contracts out any function or activity presently performed by federal employees or any new function or activity proposed to be performed by federal employees in the President's budget proposal for fiscal year 2019 for DHS; (3) augments funding for existing PPAs in excess of \$5,000,000 or 10 percent, whichever is less; (4) reduces funding for any PPA, or numbers of personnel, by 10 percent or more; or (5) results from any general savings from a reduction in personnel that would result in a change in funding levels for PPAs as approved by the Congress, unless the agency notifies the appropriations committees at least 15 days in advance of the reprogramming. The Act also provides that up to 5 percent of any appropriation may be transferred if the appropriations committees are notified at least 30 days in advance of the transfer, except that the destination appropriation may not be increased by more than 10 percent by the transfer. Pub. L. No. 116-6, § 503,133 Stat.13, 37.

¹⁵If the reprogramming and transfer actions meet certain thresholds, the appropriations acts provide that DHS is to notify the relevant congressional committees. The fiscal year 2018 and 2019 transfers met the notification threshold, and DHS notified the relevant committees. The fiscal year 2018 and 2019 reprogramming actions were under-the-threshold for congressional notification.

funds were available to make payroll payments to employees during the fiscal year 2019 government shutdown.

Staff funded from the Surface Programs account may be used for aviation-related activities. For example:

- TSA funds VIPR teams from the Surface Program account; however, VIPR teams are often used for aviation security activities. TSA's program guidance stated they use a risk-based approach to prioritize and schedule VIPR program operations. According to TSA, in fiscal year 2017, 41 percent of VIPR program operations were conducted in surface modes and 59 percent were conducted in aviation security. In fiscal year 2018, TSA reported that 61 percent of VIPR program operations were conducted in surface modes and 39 percent were conducted in aviation security.
- TSA also funds surface inspectors and their supervisors from the Surface Program account; however, surface inspectors can assist with aviation-related activities, as we reported in 2017.¹⁶ At that time, we found that TSA had incomplete information on the total time surface inspectors spent on those activities because of limitations in TSA's data system.¹⁷ Since then, TSA updated its system to include a field indicating whether the activity was conducted in the surface or aviation mode, demonstrating that TSA has visibility over all activities surface inspectors conduct. In fiscal year 2018, TSA reported that surface inspectors spent about 16 percent of hours on aviation-related activities.

TSA's Guidance for Its Training and Exercise Program Does Not Fully Establish Coordination Procedures and Time Frames

TSA's 2016 Surface Division Internal Operating Procedure details the planning and implementation process of I-STEP, but does not fully identify the roles and responsibilities for key TSA offices or time frames for when those offices should coordinate to support training and exercise

¹⁶[GAO-18-180](#).

¹⁷TSA's Performance and Results Information System is TSA's system of record. TSA guidance directs surface inspectors to report the time they spend on all activities into this system.

planning.¹⁸ PPE has primary responsibility for planning and implementing I-STEP under the procedure and coordinates with other TSA offices to facilitate exercises and accomplish the program's goals. Specifically, PPE officials stated that SO and the Intelligence and Analysis (I&A) offices, have important roles in helping PPE to plan and conduct tabletop exercises using I-STEP's online exercise tool to facilitate planning in the field. For example, PPE officials stated that SO conducts external outreach to surface transportation stakeholders to identify participants and exercise locations, and I&A provides intelligence briefings that give background context to participants.¹⁹

The roles and responsibilities of SO and I&A are not captured in the operating procedure in part because program responsibilities have changed since the procedure was issued in 2016. For example, the operating procedure describes PPE's primary responsibility for industry engagement, but does not discuss SO's surface inspectors' role in stakeholder and industry outreach for I-STEP. Specifically, surface inspectors reach out to industry stakeholders to identify participants interested in conducting an exercise. Surface inspectors also help handle logistics, such as coordinating with local responders and stakeholders. However, the operating procedure has not been updated since 2016 to capture this transition of SO responsibilities.

In the absence of a policy that clearly defines all current offices that should coordinate and when, PPE may also be missing consistent input and important information from relevant offices across TSA. For example, PPE officials indicated that I&A officials can support I-STEP exercises by providing intelligence briefings, when requested, and can assist at or before initial PPE planning meetings. However, I&A officials stated that they do not typically participate in the PPE planning meetings that help identify and prioritize exercises based on risk-based intelligence documents, because they are not consistently invited to attend. Further, according to I&A officials, they sometimes receive a few weeks' notice, or no notice at all to prepare intelligence briefings for upcoming exercises.

¹⁸According to the Internal Operating Procedure: Intermodal Security Training Exercise Program (I-STEP) for Surface Transportation Systems, 2016-IOP-200-010, the guidance identifies procedures detailing risk-based security considerations for I-STEP exercise requests and associated planning and approval of those exercise requests within the Surface Division.

¹⁹Based on fiscal year 2019 activities, TSA estimated about 13 FTEs across four offices were used for the planning and implementation of I-STEP exercises. Specifically, PPE had 11 FTEs, I&A had 0.1 FTEs, and SO had 2 FTEs.

I&A officials explained that while they have supported exercise planning, there is no formal role for the office in the procedure or expected time frames for providing information.

Our *Standards for Internal Control in the Federal Government* states management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.²⁰ Management then develops the overall responsibilities from the entity's objectives that enable the entity to achieve its objectives. TSA officials stated that they plan to revise the 2016 Surface Division's Internal Operating Procedure. This planned revision presents an opportunity to identify and clarify roles and responsibilities for all offices involved in the coordination of the exercise, including when they should to coordinate.

Conclusion

TSA allocates resources for surface transportation activities, including I-STEP voluntary training and exercises with system operators and governmental security partners. While PPE coordinates with several offices across TSA to accomplish the program's goals, coordination guidance could be improved. Although PPE has discussed the roles and responsibilities for offices outside of PPE, how and when these offices should coordinate has not been clearly defined in its sole guidance document. As a result, TSA may be missing input and information from relevant offices. Formalizing planning responsibilities, specifically with I&A, would allow for consistent involvement in the planning process and give analysts more time to prepare intelligence briefings for exercises. Also, with surface inspectors performing stakeholder outreach in addition to PPE's primary role for industry engagement, formalizing planning and external outreach roles and responsibilities for SO would ensure consistent outreach in the field.

Recommendation for Executive Action

We are making the following recommendation to TSA:

The TSA Administrator should clarify roles and responsibilities for all offices involved in the coordination of surface transportation exercises,

²⁰[GAO-14-704G](#).

including when these offices are to coordinate, as part of the planned revision of the Surface Division's Internal Operating Procedure for I-STEP. (Recommendation 1)

Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to DHS. DHS provided written comments, which are reproduced in Appendix I. In their comments, DHS concurred with the recommendation and described actions planned to address it, including an estimated timeframe for completion. If fully implemented, these actions should address the intent of the recommendation and better position TSA's offices to execute roles and responsibilities for planning and implementing I-STEP. TSA also provided technical comments, which we incorporated as appropriate

We are sending copies of this report to the appropriate congressional committees and the Acting Secretary of Homeland Security. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions concerning this report, please contact me at (202) 512-8777 or RussellW@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made significant contributions to this report are listed in Appendix II.



W. William Russell, Director
Homeland Security and Justice

List of Committees

The Honorable Roger F. Wicker
Chairman

The Honorable Maria Cantwell
Ranking Member
Committee on Commerce, Science, and Transportation
United States Senate

The Honorable Ron Johnson
Chairman

The Honorable Gary C. Peters
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Bennie G. Thompson
Chairman

The Honorable Mike Rogers
Ranking Member
Committee on Homeland Security
House of Representatives

Appendix I: Comments from the Department of Homeland Security

U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

November 5, 2019

W. William Russell
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

RE: Management Response to Draft Report GAO-20-185, "SURFACE
TRANSPORTATION: TSA Should Improve Coordination Procedures for Its
Security Training Program"

Dear Mr. Russell:

Thank you for the opportunity to review and comment on the subject draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Transportation Security Administration's (TSA) is the primary federal agency responsible for securing transportation networks in surface modes, including mass transit, passenger rail, freight rail, highway and motor carriers, and pipelines.

As a leader in the global transportation security network, TSA continuously strives to work collaboratively with others and raise the baseline of surface transportation security. Securing the transportation system is a complex mission that requires a "whole of community" approach. TSA remains committed to maintaining the strong partnerships across governments, industry, and with others that are integral to success in this shared security mission.

The draft report contained one recommendation, with which the Department concurred. Attached find our detailed response to the recommendation. DHS previously submitted technical comments under a separate cover.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,



JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendation
Contained in GAO-20-185**

GAO recommended that the TSA Administrator:

Recommendation 1: Clarify roles and responsibilities for all offices involved in the coordination of surface transportation exercises, including when these offices are to coordinate, as part of the planned revision of [Intermodal Security Training and Exercise Program] I-STEP's Surface Division Internal Operating Procedure.

Response: Concur. TSA's Program Policy and Engagement Office will develop a standard operating procedure to clarify the roles and responsibilities for all offices involved in the coordination of surface transportation exercises, including when these offices are to coordinate, in conjunction with the planned revision of I-STEP's Surface Division Internal Operating Procedure. Estimated Completion Date: May 29, 2020.

Text of Appendix I: Comments from the Department of Homeland Security

Page 1

November 5, 2019

W. William Russell

Director, Homeland Security and Justice

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548

RE: Management Response to Draft Report GAO-20-185, "SURFACE
TRANSPORTATION: TSA Should Improve Coordination Procedures for Its Security
Training Program"

Dear Mr. Russell:

Thank you for the opportunity to review and comment on the subject draft report. The

U.S. Department of Homeland Security (DHS) appreciates the U.S. Government
Accountability Office's (GAO) work in planning and conducting its review and issuing
this report.

The Transportation Security Administration's (TSA) is the primary federal agency
responsible for securing transportation networks in surface modes, including mass
transit, passenger rail, freight rail, highway and motor carriers, and pipelines.

As a leader in the global transportation security network, TSA continuously strives to
work collaboratively with others and raise the baseline of surface transportation
security. Securing the transportation system is a complex mission that requires a
"whole of community" approach. TSA remains committed to maintaining the strong
partnerships across governments, industry, and with others that are integral to
success in this shared security mission.

The draft report contained one recommendation, with which the Department
concurred. Attached find our detailed response to the recommendation. DHS
previously submitted technical comments under a separate cover.

Page 2

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

Jim H. CRUMPACKER, CIA, CFE

Director

Departmental GAO-OIG Liaison Office

Attachment

Page 3

Attachment: Management Response to Recommendation Contained in GAO-20-185

GAO recommended that the TSA Administrator:

Recommendation 1: Clarify roles and responsibilities for all offices involved in the coordination of surface transportation exercises, including when these offices are to coordinate, as part of the planned revision of Internodal Security Training and Exercise Program] 1-STEP' s Surface Division Internal Operating Procedure.

Response: Concur.

TSA' s Program Policy and Engagement Office will develop a standard operating procedure to clarify the roles and responsibilities for all offices involved in the coordination of surface transportation exercises, including when these offices are to coordinate, in conjunction with the planned revision of I-STEP's Surface Division Internal Operating Procedure. Estimated Completion Date: May 29, 2020.

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

W. William Russell, 202-512-8777 or RussellW@gao.gov

Staff Acknowledgments

In addition to the contact named above, Ellen Wolfe (Assistant Director), Amber Edwards (Analyst-in-Charge), Lilia Chaidez, Dominick Dale, Tracey King, Leah Nash, Natasha Oliver, and Michael Silver made key contributions to this report.

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<https://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <https://www.gao.gov> and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/fraudnet/fraudnet.htm>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

Orice Williams Brown, Managing Director, WilliamsO@gao.gov, (202) 512-4400,
U.S. Government Accountability Office, 441 G Street NW, Room 7125,
Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548



Please Print on Recycled Paper.