Executive Summary:
Internal Audit Report #07-11
Security Program Audit
October 22, 2007

Organization Impact:

Overall Conclusions:

Security organization and management
As part of the audit, the security structure at Capital Metro was compared to those at similar transit organizations. Benchmarking indicates that Capital Metro provides security coverage of its service area and facilities within a lower operating budget than the peer group’s average.¹ The approved FY2007 security staffing level for Capital Metro is consistent with its transit peers. The Authority has approximately 45 internal and external full time equivalents (FTEs); transit peers average just over 48 FTEs. This comparison, combined with a generally lower rate of crime associated with rail operations,² does not signal a need to significantly increase the security FTE headcount. However, the types of available skill and expertise will likely require adjustment. For example, currently there is limited internal expertise within the Safety & Security Department for planning and executing the security program.

Efforts are underway to study and refine, as appropriate, the Authority’s security structure and staffing. An external security consultant performed a risk-vulnerability assessment of the commuter rail line and will provide staffing recommendations based upon the assessment’s findings.

The initial security solution used at the beginning of commuter rail operations will likely evolve as Capital Metro’s statutory authority³ and/or agreements with local law enforcement agencies are modified. For example, Capital Metro does not have the authority to hire non-TCLEOSE⁴ certified “fare enforcement officers” for issuing citations for rail fare infractions. Additional statutory language, similar to that enacted for Dallas Area Rapid Transit, is needed to deploy the lower cost

¹ The percentage of the Authority’s FY2007 operational budget dedicated to security (1.65%) is less than both the FTA Top 75 Transportation Entity benchmark (4.20%) and the average of its peer group (2.37%). However, the percentage of full-time equivalent (FTE) staff devoted to security (3.78%) is more than the 3.05% peer group average. Similarly, when comparing security FTEs to total unlinked passenger trips, Capital Metro’s 1.35 staffing ratio exceeds both the FTA Top 75 benchmark (1.28) and the peer group average (1.20).
⁴ Texas Commission on Law Enforcement Officer Standards and Education (TCLEOSE). See http://www.tcleose.state.tx.us/ for more information.
non-commissioned officers. The Chief Operating Officer (COO) is currently working with the
Chief Counsel to address potential legal and contractual issues.

Ultimately, the security plans and efforts across all transit modes will need to be integrated as part of
a comprehensive unified program. With the pending launch of commuter rail, security planning and
execution duties have been split among the Safety & Security Department, Commuter Rail, Freight
Rail, and external consultants. While there is cooperation and communication between these
groups, clear responsibilities and accountability, along with specific deadlines for completing key
security deliverables (e.g., System Security Plan) were not established. Recommended project plans,
once implemented, should assist these groups in meeting statutory security compliance requirements
and deadlines.

Security planning and programs
During 2005, the FTA commissioned a consultant review of Capital Metro’s security readiness. This
“Top 20 Assessment” evaluated Capital Metro’s level of adherence to twenty high-level “Security
Program Action Items.” Although the FTA Action Items are not currently regulatory requirements,
they reflect transit industry best practices. However, once commuter rail operations begin, a
number of these formerly voluntary measures become regulatory compliance issues.

Internal Audit’s assessment of the current implementation status of the ten most significant FTA
“Action Items” revealed that two were “substantially met” while the remaining eight were classified
as “partially met.”

Of the eight outstanding issues, two are particularly important. The first outstanding issue concerns
the need to establish a systematic risk management process to assess and manage threats,
vulnerabilities, and consequences. An ongoing process to monitor progress towards addressing risks
and implementing recommendations from prior security studies and reports does not exist.
Although Internal Audit found limited evidence of updates, none of the seven security reviews or
exercises completed since 2001 have been formally tracked and reported to management on a
consistent basis. A system to document and update executive management on identified threats and
vulnerabilities helps prioritize the most significant issues. The second outstanding issue highlights
the need to maintain and consolidate security-related plans and standard operating procedures.

Audit Highlights—Major Issues and Action Plans:
This executive summary includes only the most significant audit issues. All audit issues and
corrective action plans are included in the detailed audit report. For additional information, refer to
the corresponding recommendation in the detailed audit report.

1. Establish multi-modal security organizational structure and adjust staffing to address
new system services. Capital Metro will open its commuter rail service in late 2008. Three
primary issues to consider when selecting a security structure include how to address cross-
jurisdictional boundaries, fare enforcement, and whether to create a transit police force within the
Authority. An external consultant has performed a threat and vulnerability assessment (TVA) on
the commuter rail line and, based upon the TVA results, will provide recommendations for
commuter rail security staffing.

The Chief Operating Officer will use the TVA results, consultant recommendations, and Internal
Audit’s transit peer benchmarking results to refine the Authority’s security structure and staffing. A
staffing and structure recommendation to address commuter rail security will be submitted to the CEO by Feb. 1, 2008. To ensure viability of desired long-term security solutions, the COO will work with the Chief of Staff to seek legislative changes in FY 2009 to provide more flexibility for commuter rail fare enforcement. Furthermore, the Chief of Staff will work with legislators and local police as needed to amend laws and/or implement formal agreements that could better address transit-specific security needs.

2. Assign responsibilities and develop project plan for implementing commuter rail security. A detailed project plan which documents requirements, timelines, deadlines, and responsible parties for implementing a commuter rail security program does not exist. The Director of Safety and Security will work with the Commuter Rail Department staff to develop a comprehensive project plan and timeline for implementing required security elements for commuter rail operations. The plan will include all security-related tasks and delegated accountable parties responsible for developing and/or implementing the System Security Plan (SSP)/security program. A draft project plan will be submitted to the COO for review and approval by the end of February 2008.

4. Monitor and track implementation status of recommendations to strengthen the security program. An ongoing process to monitor and track the implementation status of FTA Action Items and other existing recommendations to strengthen the Authority’s security program does not currently exist. A system to document and update executive management on identified security risks helps prioritize the most significant issues. Also, a documented process is required for commuter rail operations. Due to the number of outstanding security issues, management will require additional time to evaluate and formulate responses. Beginning Spring 2009, the Director of Safety & Security will report to the Chief Operating Officer (COO) the implementation status of security related recommendations for all existing security reviews. As part of this monitoring effort, documentation of whether the risk was accepted, eliminated, or mitigated will be captured. Updated reports will be prepared twice a year and Internal Audit will obtain and report these results as part of the semi-annual implementation status update.

ACCEPTED:

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