



OFFICE *of* INSPECTOR GENERAL
NATIONAL RAILROAD PASSENGER CORPORATION

SAFETY AND SECURITY:

Longstanding Physical Security Vulnerabilities in Philadelphia
Pose Risks

Certain information in this report has been redacted due to its sensitive nature.

OIG-A-2018-007 | April 24, 2018

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Memorandum

To: DJ Stadtler
Executive Vice President/Chief Administration Officer

Scot Naparstek
Executive Vice President/Chief Operating Officer

From: Stephen Lord 
Assistant Inspector General, Audits

Date: April 24, 2018

Subject: *Safety and Security: Longstanding Physical Security Vulnerabilities in Philadelphia Pose Risks (OIG-A-2018-007)*

Amtrak (the company) has identified risks to employee and passenger security as a top threat facing the organization. Philadelphia's 30th Street Station, the company's third-busiest station, served more than 4.4 million Amtrak riders and generated more than \$306 million in revenue in fiscal year (FY) 2017. Penn Coach Yard is a 63-acre complex adjacent to the station where the company services its trainsets and locomotives. Security incidents at the station or yard could put the safety and security of the company's passengers and more than 2,700 employees who work at these facilities at risk and disrupt operations along the Northeast Corridor and on the Keystone Service west toward Harrisburg, Pennsylvania.

Our objective was to assess the company's efforts to enhance the physical security of 30th Street Station and Penn Coach Yard. We focused our review on company actions to address weaknesses identified in the security vulnerability assessments of the Emergency Management and Corporate Security department (EMCS). We supplemented this analysis with our observations of practices in the yard and station. We also compared the company's security efforts to relevant company policies that contribute to physical security, as well as private- and public-sector security practices and management control standards. To provide additional context, in August 2017 we conducted focus groups of 94 employees who work in the station or the yard, including ticketing and customer service agents, conductors, engineers, mechanics, and police officers. For more information on our scope and methodology, see Appendix A. For a summary of our focus group results, see Appendix B.

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SUMMARY OF RESULTS

Longstanding unmitigated security weaknesses at Philadelphia's 30th Street Station and Penn Coach Yard are placing the security and safety of the company's passengers and employees at risk. Although the company has taken important steps to address some security vulnerabilities identified in its risk assessments, other longstanding security weaknesses are unmitigated and warrant senior management attention to ensure they are addressed. These include the inability to secure the station's exterior and interior station doors, poor controls over badging, inadequate fencing and gates, a lack of parking enforcement in the yard, and nonoperational video surveillance cameras. The company estimates that it could cost about \$20 million to mitigate these weaknesses, but it has not established a plan for executing the various projects needed.

Since 2009, several longstanding security vulnerabilities have remained unaddressed in Philadelphia, and we identified the following additional weaknesses during our audit:

- **The exterior doors of the station cannot be locked**, either because they do not have locks or because the responsible officials do not have keys for them. As a result, the company cannot control access to the station during non-operating hours or in an emergency. A project to address this weakness is stalled because the company has not identified a department to fund the project and move it forward. In 2017, the Amtrak Police Department (APD) reported 147 incidents of trespassing, 53 of drug or alcohol abuse, and 45 of larceny or burglary in the station. Further, station and yard staff told us they receive little or no training on how to handle these types of situations, which is inconsistent with leading practices for training frontline employees.
- **The interior doors of the station are not secure** because responsible officials do not have keys for them, combination lock codes are not changed regularly, and card reader devices do not work consistently. During our review, the company repaired the card readers, but employees told us that several card readers have not worked consistently for years. Also, employees told us that some combination lock codes in the station and the yard had not been changed in years.
- **The company's badging policy is not sufficiently restrictive and is not consistently implemented**; as a result, company facilities at the station and in the yard are not secure. For example, more than 450 employees and contractors in

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the ticketing department across the country have access [REDACTED] in Philadelphia where cash is stored, but only 26 employees actually work there. As a result, employees told us they regularly see individuals accessing their office spaces who should not be there. We also identified a former employee who regularly used a badge that should have been deactivated when he left the company in 2012 to continue to access company facilities in Philadelphia and elsewhere while serving as a union representative.

- **The yard is not secure** because its perimeter fencing is damaged, there are no gates at the entrances to the yard, and the yard is not routinely patrolled. A project to install gates in the yard has not been implemented because the company has not identified a department to fund and manage the construction phase. As a result, trespassers can easily access and park in the yard, which has resulted in thefts and other issues—including an intoxicated driver overturning a vehicle onto the tracks in 2013. Further, during two unannounced inspections of the yard in May 2017 and March 2018, we found that only about a third of the vehicles parked in the yard displayed a valid parking permit.
- **Not all video surveillance system (VSS) cameras are operational** in the station and the yard because the company has not designated a department to be responsible for their maintenance and repair, an action we recommended in 2016.¹ For example, when we reviewed the cameras in July 2017, a total of [REDACTED] of the [REDACTED] cameras in the yard were not working and had not worked in months. Although the company repaired [REDACTED] cameras during our review, [REDACTED] were not operational as of January 2018. This hinders the company's ability to monitor activity in the yard and investigate and deter criminal activities.

To help mitigate these security risks and facilitate the completion of security projects, we recommend that the company document and initiate a plan describing how it intends to mitigate the security weaknesses, including establishing roles and accountability for project implementation, developing performance measures for assessing progress, and creating business cases to help establish relative funding priorities. In commenting on a draft of this report, the Chief Administration Officer and Chief Operating Officer agreed with our recommendation to initiate a plan to address the security vulnerabilities we identified in Philadelphia, and they identified specific

¹ *Information Technology: Progress Made Installing Video Surveillance Systems, but Coverage and Performance Could Be Improved* (OIG-A-2016-010), August 9, 2016.

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actions, responsible departments, and planned completion dates for addressing each vulnerability identified in our report. For management's complete response, see Appendix C.

BACKGROUND

The Real Estate, Stations, and Facilities department (Real Estate) under the Chief Administration Officer is responsible for overseeing the operation and maintenance of facilities owned and leased by the company. The department works with internal company stakeholders to coordinate and advance capital projects, including those related to security. It also maintains company guidelines regarding station and facility improvements.

The Operations department, headed by the Chief Operating Officer, manages key functions in the station and yard, including identifying and implementing security and infrastructure improvements. Five business units in the Operations department have the following roles and responsibilities in the station and the yard:

- **EMCS** leads the company's efforts to identify and address security threats and vulnerabilities, including those in the station and the yard.² In response to recommendations in the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Commission Act of 2007),³ EMCS conducted two triennial risk assessments of the company's highest-risk stations and assets, including the station and yard—in 2009 and 2012—and began its third assessment in 2017. These studies include assessing risks at the station and yard in Philadelphia. In addition to these companywide assessments, EMCS completed two site-specific vulnerability assessments for the station and the yard in 2014 and 2016.
- **APD** is the company's police force, which focuses on protecting passengers, employees, and property. APD's operations in Philadelphia include uniformed patrols in the station, along rights-of-way, and in the yard. It conducts criminal investigations; special events management; and task force operations in Philadelphia and other Amtrak facilities in coordination with local, state, and

² EMCS also oversees emergency preparedness planning and incident management coordination, and it conducts security awareness, training, and exercise programs for employees and external stakeholders.

³ Pub. L. No. 110-53.

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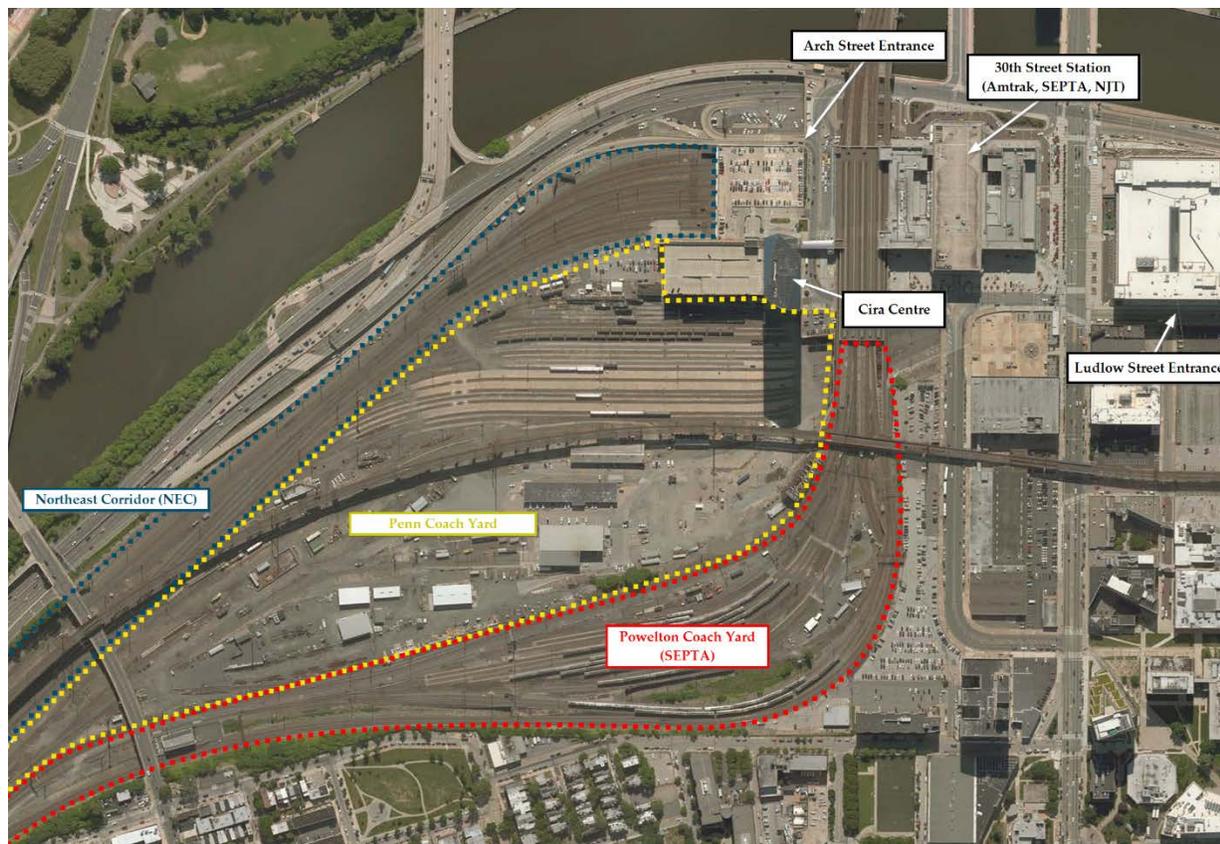
federal agencies. It also oversees the company's explosive detection canine and baggage screening programs.

- **The Engineering department** is responsible for maintaining and repairing infrastructure in the station and the yard, as well as along the platforms and tracks. Some Engineering projects are related to enhancing security, such as installing perimeter fencing.
- **The Mechanical department** is responsible for maintaining and repairing the company's locomotives, passenger cars, and related equipment. In Philadelphia, the Mechanical department primarily services passenger train equipment used for the company's Keystone service, which runs between New York City and Harrisburg, Pennsylvania. Mechanical department employees in Philadelphia help identify and report security issues and potential threats in the yard, including trespassers and illegally parked vehicles.
- **The Transportation department** is responsible for overseeing the movement of trains and passengers. In Philadelphia, the Passenger Services department oversees passenger movement, ticketing, baggage, customer service, and station cleanliness. These employees work directly with passengers and help identify and report security threats to APD.

In addition to Amtrak, in FY 2017 the station served more than 12 million riders of the Southeastern Pennsylvania Transportation Authority (SEPTA) and New Jersey Transit (NJT). SEPTA's 13 regional rail lines and NJT's Atlantic City rail line provide passenger services to and from the station. The station also serves as a hub for SEPTA's trolleys and subway services, and private bus lines. The facilities supporting the station, rail lines, and the yard are shown in Figure 1 on the next page.

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Figure 1. Map of Philadelphia 30th Street Station and Penn Coach Yard



Source: OIG labeling of Amtrak photograph

SOME SECURITY VULNERABILITIES AT THE STATION AND THE YARD WERE ADDRESSED, BUT OTHERS REMAIN

The company has made progress toward addressing some of the physical security challenges at 30th Street Station and Penn Coach Yard; however, several security vulnerabilities remain unaddressed. These include the inability to secure the station's exterior and interior station doors, poor controls over badging, inadequate fencing and gates, a lack of parking enforcement in the yard, and non-operational video surveillance cameras.

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The Company Has Addressed Some Security Vulnerabilities

Since 2009, the company used about \$12 million in federal grant funds⁴ to address security weaknesses at the station and in the yard that it identified in companywide security vulnerability assessments. This included the following capital projects and other operational improvements in Philadelphia:

- the installation of bollards at station entrances and additional perimeter fencing at the station and yard to further curtail unauthorized access of vehicles
- increased police patrols for special events
- the use of explosive detection canine teams to detect possible explosives in customer baggage
- the use of public information display stations to communicate security-related information to station employees and passengers
- the installation of access control systems, including card readers and badges, to help limit unauthorized access to some restricted areas in the station and yard
- the installation of video surveillance in some areas of the station and the yard, including cameras, recorders, and monitoring screens

Station officials told us that these enhancements have resulted in improving the security of the station. For example, participants in our focus groups told us that (1) the increased police presence in the station has had positive effects and (2) the increased use of access control systems has reduced unauthorized access to work areas. Further, additional video surveillance cameras have allowed them to follow up on security incidents.

Security Weaknesses Remain at the Station and Yard

Since 2009, several longstanding security vulnerabilities have remained unaddressed in Philadelphia. EMCS officials told us that each year they try to fund the highest-risk projects the department can afford nationwide. However, with an annual federal grant budget of \$5 million, EMCS officials told us they cannot address all of the remaining

⁴ Grant funds were provided by the Transportation Security Administration Intercity Passenger Rail program and the American Recovery and Reinvestment Act of 2009.

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security weaknesses in Philadelphia, which could cost about \$20 million, including the following:⁵

- no locks on some exterior station doors, and no keys for doors that have locks
- ineffective controls on internal doors, and the need for additional access control card readers
- lack of adherence to controls for company-issued badges
- inadequate perimeter fencing, a lack of gates, and poor parking enforcement to control access to the yard
- need for operational video surveillance coverage

Given current funding demands, EMCS officials told us that they typically look to other departments to fund security projects—such as the Engineering and Mechanical departments, whose budgets exceed \$1 billion for FY 2018. However, officials from these departments told us they do not typically include such projects in their capital budgets because they do not consider security projects to be their responsibility. In addition, although the Real Estate department facilitates station improvements companywide, it typically has not had a role in implementing security projects, according to company officials.

The Chief Administration Officer, Chief Operating Officer, and other company officials agreed that the process to implement security projects has lacked coordination and clear accountability. They told us that the various departments should each have a role—identifying risks, prioritizing projects, formulating a plan, building business cases, obtaining funding, and managing projects—but that the Real Estate department should have the overall responsibility for developing a plan and providing overall coordination for implementing it. Until these roles and responsibilities are clarified, the security weaknesses we identified above and discuss below may remain unaddressed.

Exterior station doors are not secure. Of the ■ exterior station doors we inspected on November 14, 2017, we found that ■ doors do not have locks. The other ■ have locks, but responsible officials do not have keys for them. Further, station managers do not

⁵ We previously reported that the funding for physical security may not be sufficient to address weaknesses the company identifies. *AMTRAK: Top Management and Performance Challenges—Fiscal Years 2017 and 2018* (OIG-SP-2017-009), March 29, 2017.

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have an inventory of who has keys to the station's locks. This is inconsistent with company policy,⁶ which requires station managers to maintain key inventories and master sets of keys. Accordingly, station officials are unable to [REDACTED] or during an emergency.

Officials from APD, EMCS, and the Engineering department told us they are working together to design a project to install a system of electromagnetic locks on all exterior doors that could be automatically locked during designated times and in an emergency.⁷ APD identified the problem, EMCS identified the hardware needed, and APD submitted an FY 2018 request for \$750,000 to fund the initial design work. However, APD's request was denied because Finance department officials said the Engineering department was better suited to implement and manage the project. An Engineering department official told us that after the Engineering department completes the design work, it expects EMCS or another department to manage the overall project, including seeking funding for the project through the company's capital planning process. However, EMCS officials told us they typically expect the affected departments—in this case APD or the Engineering department—to provide funding and project management support, with EMCS serving in an advisory role.

As of February 2018, the effort is at a standstill because the company has not identified anyone to take responsibility for completing the project, including obtaining the funding necessary to do so, according to EMCS, APD, and Engineering department employees. As a result, the Engineering department's funds used for the initial design are at risk of being wasted if the project is not completed. In addition, the station remains open to the public 24 hours a day, 7 days a week, although the company closes other large stations during non-operating hours.

Prioritizing capital projects as part of the budget process is a longstanding challenge that we have previously reported on, most recently in 2017.⁸ The process must clearly identify roles for making budget decisions, securing available funding sources, and obtaining necessary commitments from the Finance department for projects. The lack of

⁶ Amtrak Reservations, *Ticketing and Station Procedures Manual*, Station Security Keys and Safe Combinations Chapter, May 2, 2016.

⁷ When completing this project, the company must consider local fire code and historical building requirements pertinent to 30th Street Station, according to an APD official.

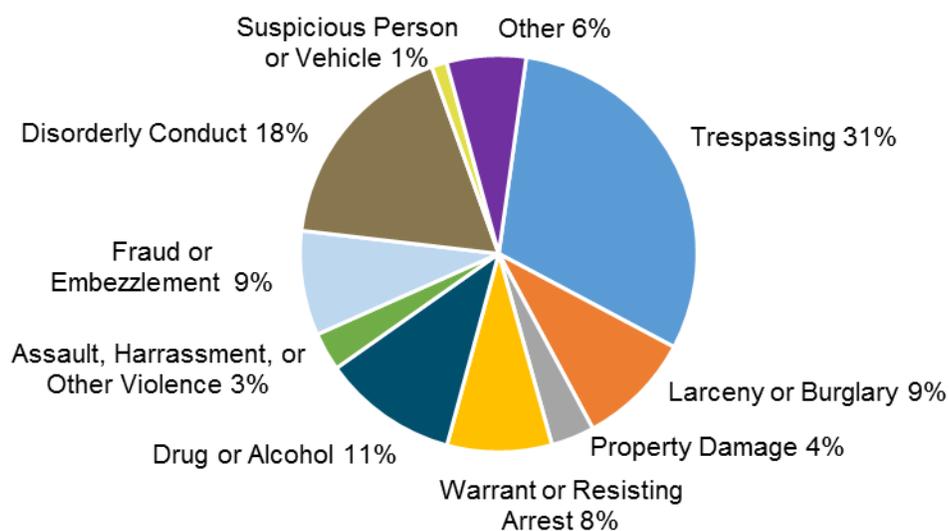
⁸ *Governance: Addressing Remaining Shortcomings Would Lead to a Budget Development Process More Fully Aligned with Leading Practices* (OIG-A-2017-004), January 17, 2017.

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a clearly defined process for implementing security-related capital projects exposes the company's passengers and employees to unnecessary security risks. For example, employees who work at the station told us about incidents of trespassers overdosing on drugs in the bathrooms and committing crimes against employees and passengers—particularly during hours when trains are not operating.

APD staff told us they spend a large portion of their time addressing trespassing issues, especially during the night shift. APD's crime statistics for the station showed 481 crime-related incidents reported in 2017. Of these, 147 were related to trespassing, a 25 percent increase from 2016. In addition, APD reported 53 incidents of drug or alcohol abuse and 45 larcenies or burglaries in the station in 2017. Figure 2 shows the crime-related incidents in the station reported by APD in 2017.

Figure 2. Crime-related Incidents Reported for Philadelphia 30th Street Station in 2017



Source: OIG analysis of APD data

Focus group participants told us they regularly observe these types of situations in the station, but they receive little or no training on how to handle them. Although 68 of the 94 station and yard employees we interviewed as part of our focus groups agreed that security was their responsibility, only 34 responded that they had seen or participated in a security training effort such as daily crime prevention tips received via email or the *See Something, Say Something* program—a company campaign encouraging employees and passengers to remain vigilant and alert to security threats and report them.

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The “word cloud” shown in Figure 3 summarizes the types of responses provided by focus group participants when we asked what type of security training they had received. The size of each word represents the number of times the focus group participants provided the response, with 23 employees responding most frequently to “No Training,” and 2 responding to “Active Shooter” or “Anti-terrorism Training.”⁹

Figure 3. Focus Group Responses on Security-related Training Received



Source: OIG analysis of focus group participant responses as of August 2017

Note: Block Training is a bi-annual training program for conductors, engineers, and dispatch staff. The Roadway Worker Protection program is a Federal Railroad Administration program for on-track safety.

The company’s approach to security-related training is inconsistent with the 9/11 Commission Act of 2007, which identifies the importance of security training for frontline rail employees, and with management control standards that call for providing ongoing basic training to all employees in security awareness and emergency response. The company provides emergency preparedness and response training to its frontline employees in alignment with federal regulations,¹⁰ but in 2016 it eliminated the module on security training (and several other modules) from bi-annual training requirements to reduce the length of required training for frontline employees, according to a company training official. Without such training, frontline employees may not have the necessary information and understanding to effectively contribute to the company’s security efforts or to deal with the types of incidents noted above.

⁹ We organized similar responses from 63 focus group participants into categories; 31 of 94 participants did not answer this question.

¹⁰ Passenger Train Emergency Preparedness, 49 C.F.R. § 239 (2011).

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Internal doors are not secure. The company relies on key locks, combination locks, and card readers at internal doors to limit access to areas of the station restricted to employees only; however, we identified challenges with each of these measures that hinder the company's ability to secure restricted areas within the station. Further, EMCS identified the need for additional card readers throughout the station.

Similar to the exterior doors, responsible officials do not maintain keys or key inventories for the door locks in the station, which is inconsistent with company policy.¹¹ Additionally, the company does not have a policy for how often combinations should be changed, which is inconsistent with private- and public-sector security practices. In the absence of a policy, the station facilities manager said that door lock combinations are not changed regularly and that each office is responsible for changing and maintaining their combinations.

Focus group participants and other staff we interviewed told us that combinations are not changed regularly, if at all, and noted that some have remained the same for years. For example, a terminated employee used an unchanged combination to gain access to an employee break area to sleep and shower, according to former colleagues of the employee. The department changed the combination once the former employee's activities were discovered. In another example, the lock for the gate installed at the back side of the yard has had the same combination code for about 20 years, according to an employee who has been with the company during that time.¹²

To help enhance access controls, the company installed 132 card readers on interior doors and elevators at the station that scan employee badges to identify whether the employee has access rights to those areas. However, company employees told us that several card readers have not worked consistently for years, and that employees prop the doors open or use combination locks instead of using the card readers.

EMCS officials acknowledged that they are responsible for repairing the card readers but said that the problem is often not the card reader but the structure of the door and frame, which would be handled by the Engineering department under an informal

¹¹ Amtrak Reservations, *Ticketing and Station Procedures Manual*, Station Security Keys and Safe Combinations Chapter, May 2, 2016.

¹² The effects of these weaknesses were evident at another Amtrak station where company employees could not locate approximately \$2,000 that had been placed in a safe in [REDACTED]. Our office determined that the safe was accessible to many company employees, and its combination (the zip code for the station) was widely known.

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agreement between the two departments. During our audit, the Engineering department repaired the station doors we reviewed, and all of the card readers were operational as of December 2017, according to EMCS officials. Nonetheless, without a formalized agreement or policy that establishes who is responsible for repairing card readers and under what timeframes the repairs will occur, the company lacks assurance that these issues will be adequately addressed in the future.

Badge controls are ineffective. Ineffective implementation and enforcement of the company's identification card (badge) policy¹³ and its related practices compound the company's inability to secure doors to facilities in the station and the yard. The policy establishes guidelines for issuing and collecting employee badges used to access company property; however, it does not limit employee access to specific facilities, which is inconsistent with access control standards that recommend limiting access to the minimum level necessary.¹⁴

Focus group participants told us they regularly see unknown individuals accessing and walking through their work areas. This includes the station's [REDACTED], which maintains the safe with cash collected from trains arriving in Philadelphia. We found that more than 450 ticketing department employees and contractors across the country have access to the Philadelphia [REDACTED], but only 26 employees actually work there. EMCS employees said that further segmentation of the access control system is needed to limit access to specific facilities, but these improvements have not been made because of staffing and resource constraints.

We also found that the controls over badges are not consistently implemented in accordance with company policy:

- **Multiple active badges are issued.** EMCS should issue new badges only when an employee's badge has expired or is lost, stolen, or damaged. Nonetheless, we identified 27 employees working in Philadelphia (and another 238 employees across the company) who had more than one active badge, including several employees who were using both badges. As a result of our findings, EMCS activated an information system control that would make it impossible for the system to allow more than one active badge per employee. In addition, as of

¹³ Amtrak Employee and Contractor Identification Card Policy (Smart ID) P/I 3.15.1, August 6, 2015.

¹⁴ As of November 2017, more than 21,000 employees and contractors had general access to all Amtrak stations and yards across the country.

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February 15, 2018, EMCS deactivated the duplicate active badges that we identified.

- **Badges are not always deactivated.** EMCS is required to deactivate the badges of employees who separate from the company or are on a leave of absence longer than 180 days. However, we identified examples of individuals continuing to use badges that should have been deactivated. For example, we identified an individual who was placed on extended leave in 2012, separated from the company, and went on to serve as a union employee. The employee's badge was not deactivated and was used for five years to access various Amtrak facilities in [REDACTED]. EMCS officials said this should not have happened and deactivated the badge on October 2, 2017. However, the badge was reactivated on December 7, 2017, highlighting the need to clarify current company badging policy for separated employees.
- **Deactivated badges are not always collected.** All supervisors are required to collect badges from separating staff and return them to EMCS. However, we found that badges are not consistently collected and returned to EMCS. For example, three employees we interviewed who collect their respective division's badges shred them instead of returning them to EMCS. Further, EMCS is responsible for administering the policy but does not monitor whether it is enforced, which is inconsistent with management control standards. EMCS employees told us that resource constraints preclude them from tracking whether badges are returned. As a result, individuals have used deactivated badges to pose as employees and trespass on company property or ride trains without paying (a missed opportunity for additional revenue). This includes a suspended employee who was wearing his badge, which should have been returned, when he stole approximately \$45,000 in copper wire from the yard.¹⁵

The yard perimeter is not secure. We identified several perimeter security weaknesses related to accessing the yard. For example, we observed fencing around the yard that is incomplete, missing, or damaged, as shown in Figure 4. The Engineering department

¹⁵ The effects of these weaknesses also were evident when a retiree used his deactivated badge to pose as an employee and access secure areas in order to ship boxes on trains for customers—a violation of company policy.

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has allocated funds for fencing; however, Engineering employees told us that repairing fencing in the yard is not a high priority. Therefore, they do not do it on a regular basis.

Figure 4. Examples of Incomplete and Damaged Fencing



Source: OIG photographs, August 28, 2017

Additionally, there are no access gates at main entrances to the yard. The Engineering department, working with the Mechanical department and EMCS, spent about \$79,000 for design studies to install two access gates. The project was 90 percent designed as of January 17, 2018, and the Engineering department estimates the project would cost about \$2 million. However, as with the project to install locks on the station's exterior doors, it is unclear which department would be responsible for funding and managing the project's construction.

An Engineering department official told us that the department expects EMCS and APD to sponsor the project during the construction phase; however, EMCS officials told us that, given their limited funding, they are looking to either the Mechanical or Engineering departments (which conduct yard operations) to provide funding and management support to complete the project. As of January 2018, a department had not been identified, and funding had not been secured to complete the gates project. If the project is not implemented, the funds the Engineering department spent designing the project may be wasted.

Without secure perimeter fencing and controlled access points, trespassers can easily access the yard, station platforms, and track along the Northeast Corridor. About 74 percent of our focus group participants said they had observed trespassers or unauthorized vehicles accessing areas where they work. Also, only 27 percent of the

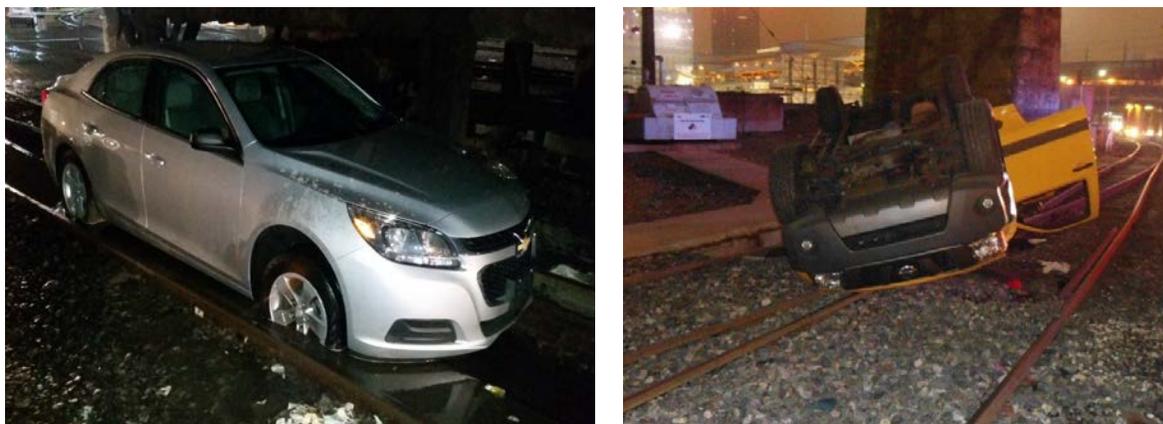
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participants agreed that the company effectively uses gates, fencing, or other physical barriers—particularly in the yard. Some also told us about drug use, prostitution, and theft of company property, including laptops from the Engineering building and scrap metal from the yard.

Moreover, these employees told us that vehicles are sometimes illegally parked near or on the tracks, which poses additional security and safety risks. Yard employees told us that illegally parked vehicles have blocked fuel tanks and other equipment necessary for company operations. For example, one illegally parked vehicle became stuck on the tracks, and another unauthorized vehicle operated by a drunk driver overturned on a ramp in the yard and landed on the tracks, as shown in Figure 5.

Figure 5. Vehicles Illegally Obstructing Tracks at Penn Coach Yard



Source: Mechanical department photograph, September 29, 2016 (left), and APD photograph, May 19, 2013 (right)

Incidents involving parking also occur because APD does not routinely patrol the yard for trespassers or enforce the company's parking permit requirements.¹⁶ To park in the yard, employees and contractors must display a valid permit and renew it every two years. However, an official from APD, which is responsible for monitoring and enforcing the use of parking permits and legal parking in the yard, told us that resource constraints prevent APD from more actively monitoring and enforcing the policy, including routinely ticketing or towing vehicles that fail to comply with it. In addition, the department does not maintain records of citations given or vehicles towed.

¹⁶ Police Parking Permit Application, APDF-90 090108.

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Although APD maintains a list of permit holders, it does not actively review the list to ensure that expired permits are being renewed, according to an APD employee.

On May 17, 2017, we conducted an unannounced inspection of parking in the yard and observed that only 70 of the 225 vehicles parked in [REDACTED] had valid parking permits (31 percent). Of the other 155 vehicles, 111 displayed expired parking permits (49 percent)—including two that expired in 2008—and 44 had no parking permit displayed at all (20 percent). We also observed a boat and race car parked in the yard, as shown in Figure 6 that were not ticketed.

Figure 6. Boat and Race Car Parked in Penn Coach Yard



Source: OIG photographs, July 20, 2017 (left), and August 2, 2017 (right)

We conducted a second unannounced inspection on March 12, 2018, and found similar results. Of the 105 vehicles we observed, 40 had valid parking permits (38 percent), 44 displayed expired permits (42 percent), and 21 had no parking permit displayed (20 percent). In addition, the race car trailer was still parked in the yard. This lack of control over vehicles accessing and parking in the yard makes the company more vulnerable to significant physical security threats such as vehicle-borne explosive devices, particularly because the yard is adjacent to the station and other company facilities.

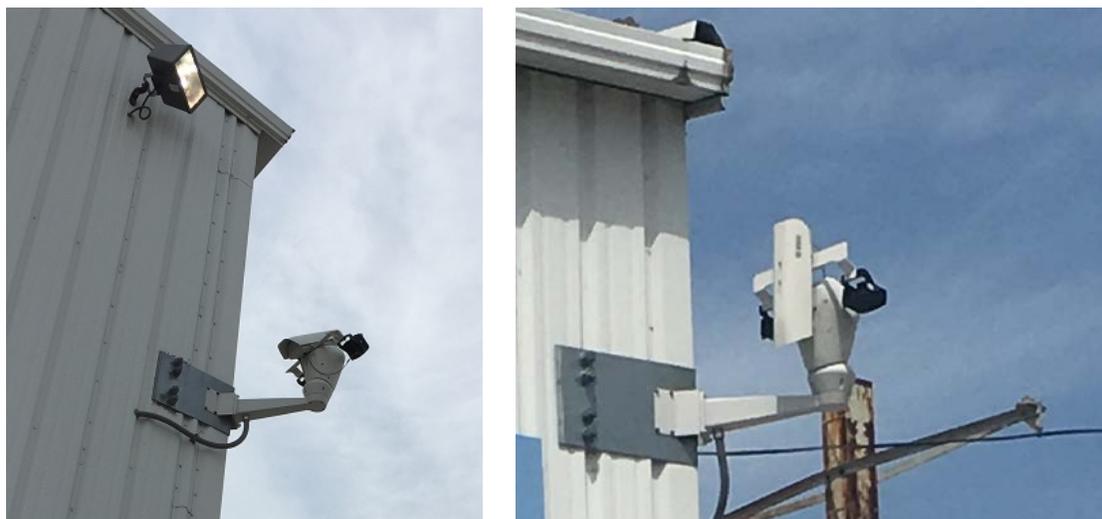
Not all video surveillance cameras are operational. On July 24, 2017, when we visited APD's video surveillance monitoring location at [REDACTED], [REDACTED] of [REDACTED] cameras in the yard were not working or positioned properly. During our review, the Engineering department repaired or repositioned [REDACTED] of these cameras; however, [REDACTED] were still not

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working as of January 9, 2018.¹⁷ Not having effective, operational cameras is inconsistent with company policy,¹⁸ which states that the company will use VSS to monitor public and nonpublic areas for safety and security, including unauthorized access to company facilities, theft of assets, and employee and customer injuries. Figure 7 shows two cameras at the yard that were not properly positioned.

Figure 7. Improperly Positioned VSS Cameras at Penn Coach Yard



Source: OIG photographs, September 12, 2017 (left), and May 4, 2017 (right)

Nonworking cameras hinder the company's ability to monitor activity in the yard and investigate and deter criminal activities, but EMCS officials said they do not have the staff or funding resources to repair the cameras. Instead, they rely on an informal agreement with the Engineering department to maintain and repair the cameras. In our 2016 report,¹⁹ we recommended that the company revise its VSS policy to identify who will be responsible for the maintenance and repair of existing video systems; however, the company had not done this as of January 2018. The informal agreement identifies the Engineering department as responsible; however, Engineering employees told us they have not received funding to maintain and repair cameras on a regular basis and, as with fencing repairs in the yard, they do so when they have time.

¹⁷ We also observed that [REDACTED] of the [REDACTED] cameras in the station [REDACTED] were not operational on August 31, 2017; however, all cameras in the station were repaired and operational when we checked on January 9, 2018.

¹⁸ Use of Video Surveillance Systems (VSS) for Safety and Security Policy P/I 3.24.1, October 6, 2015.

¹⁹ *Information Technology: Progress Made Installing Video Surveillance Systems, but Coverage and Performance Could Be Improved* (OIG-A-2016-010), August 9, 2016.

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CONCLUSIONS

Longstanding unmitigated security weaknesses at Philadelphia's 30th Street Station and Penn Coach Yard are placing the security and safety of the company's passengers and employees at risk. The company has taken important steps to address some security vulnerabilities identified in its risk assessments, but other longstanding security weaknesses—including the lack of security training of frontline staff—are unmitigated and warrant senior management attention to ensure they are addressed. The company estimates that it could cost about \$20 million to mitigate physical security weaknesses in Philadelphia. However, the company does not have a plan for implementing and funding the projects to mitigate these security risks, including creating business cases to help establish relative funding priorities and developing performance measures for assessing progress. Without such a plan, departmental responsibility for funding and managing the work needed to mitigate the security vulnerabilities at Philadelphia remains unclear. This diffusion of responsibility has left security weaknesses unaddressed posing risks to passengers and employees.

RECOMMENDATION

To improve physical security at Philadelphia's 30th Street Station and Penn Coach Yard, we recommend that the Executive Vice President/Chief Administration Officer work with the Executive Vice President/Chief Operating Officer to document and initiate a plan to address the security vulnerabilities we identified in Philadelphia by establishing clear roles and lines of accountability, resources, and performance metrics to ensure the following:

- Exterior and interior station doors can be properly secured when needed, including maintaining key inventories, regularly repairing locks and card readers, and periodically changing lock combinations.
- Frontline staff have basic physical security training so they can effectively contribute to the company's security efforts.
- Company badges are issued, collected, and deactivated as appropriate.
- Perimeter fencing is repaired, gates are installed, and parking restrictions are enforced at the yard.
- Video surveillance systems are regularly repaired and maintained.

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MANAGEMENT COMMENTS AND OIG ANALYSIS

In commenting on a draft of this report, the company's Chief Administration Officer and Chief Operating Officer agreed with our recommendation and identified planned actions and implementation dates to address the intent of our recommendation. In addition, we updated the draft report, where appropriate, to incorporate technical comments provided by the company. The company's planned actions to address each vulnerability are summarized below:

- **Exterior and interior station doors.** Management agreed with our recommendation to develop a plan to ensure that exterior and interior station doors can be properly secured, including maintaining key inventories, regularly repairing locks and card readers, and periodically changing lock combinations. In its comments, management stated that it was considering the possibility of having the company's Enterprise Program Management Office manage all the action plans discussed in this report as one project given the multiple departments, intertwined actions, and level of coordination needed across departments. The target completion date for these actions is December 2018.
- **Physical security training for frontline staff.** Management agreed with our recommendation to develop a plan to provide basic physical security training to frontline staff so they can effectively contribute to the company's security efforts. In its comments, management stated that the company is in the process of incorporating physical security protocols in existing security awareness training, updating relevant standards to include physical security training elements, and identifying training delivery methods to ensure that frontline employees receive security training. The target completion date for these actions is March 2019.
- **Issuance, collection, and deactivation of company badges.** Management agreed with our recommendation to develop a plan to ensure that company badges are issued, collected, and deactivated, as appropriate. In its comments, management stated it is establishing controls to better monitor the collection and destruction of badges, and are developing an automated alert for badges that are not returned. The target completion date for these actions is December 2018. However, management did not specify plans to clarify its badging policy for

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separated employees who continue to serve as union officials, as noted in our report. We will follow up on this issue with company officials.

- **Access controls in the yard.** Management agreed with our recommendation to develop a plan to repair perimeter fencing, install gates, and enforce parking restrictions to limit access to the yard. Management commented that actions will be taken to repair fencing and install gates, and that APD will help patrol and secure these areas. The facility manager will also conduct bi-annual facility audits to help ensure physical security standards are met. The target completion date for these actions is March 2019.
- **Video surveillance systems.** Management agreed with our recommendation to develop a plan to regularly repair and maintain video surveillance systems, including establishing responsibility for inspecting facilities, identifying inoperable cameras, and using new analytics software to identify nonworking cameras. The target completion date for these actions is December 2018.

For management's complete response, see Appendix C.

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APPENDIX A

Scope and Methodology

This report provides the results of our audit of the company's efforts to provide physical security at 30th Street Station and Penn Coach Yard in Philadelphia, Pennsylvania. Our audit objective was to assess the company's efforts to enhance the physical security of the station and the yard. The scope of our work focused on company efforts to address security weaknesses related to the station and the yard from 2009 to 2018, including employee badging, access controls, parking in the yard, and video surveillance systems. We performed our audit work from February 2017 through March 2018 in Philadelphia, Pennsylvania, and Washington, D.C. Certain information in this report has been redacted due to its sensitive nature.

To assess the company's efforts to enhance physical security at its facilities in Philadelphia, we reviewed the company's security risk assessments for the station and yard and identified the company's actions to address relevant risks. We also interviewed senior officials and employees in the Operations and Finance departments to gain their perspectives on physical security, including how the company funds and implements physical security projects in Philadelphia.

To identify control weaknesses that could affect the security of these facilities, we reviewed relevant federal regulations, commonly accepted security practices in the public and private sectors, and company policies and procedures designed to promote physical security to protect passengers, employees, infrastructure, and assets at 30th Street Station and Penn Coach Yard. We then compared the relevant regulations, leading practices, and the company's policies and procedures to the company's security activities. This included conducting site visits and unannounced inspections of the station and the yard to assess vulnerabilities and the extent to which the company adheres to relevant practices, policies, and procedures. This included two inspections of vehicles parked in [REDACTED] of Penn Coach Yard on May 17, 2017, and March 12, 2018. We reported the results of these inspections in our report.

In August 2017, to obtain insights from employees on physical security who work at the station and the yard, we conducted focus groups of 94 employees who work directly with passengers, on trains, or with equipment in the yard; who service infrastructure

Certain information in this report has been redacted due to its sensitive nature.

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and assist passengers in the station; or who work as onboard staff operating out of Philadelphia.

We applied a risk-based approach to identify participants for the focus groups by (1) identifying business units with frontline employees who work directly in the station and the yard, and (2) coordinating with their supervisors to schedule focus groups during varying times of day. We limited our reporting of focus group results to the insights provided by the 94 participants. For each focus group, we administered a questionnaire with statements to which employees responded that they agreed, disagreed, or were neutral. To solicit additional insights, we also included open-ended questions. After the employees completed the questionnaire, we held an open forum to discuss security-related topics. For a summary of the results of our focus group work, see Appendix B.

We conducted this performance audit 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 provided a reasonable basis for our findings and conclusions based on our audit objective.

Internal Controls

We reviewed management controls the company has in place for employee badging, access controls, parking in the yard, and video surveillance systems. To identify breakdowns in those processes, we reviewed company controls for enhancing physical security, including employee training. Because our objective did not include a review of all related internal controls for physical security, we limited our conclusions and recommendations to controls in those areas. We did not review the company's or any of the departments' overall system of controls.

Computer-Processed Data

We obtained data on employee badges directly from the Lenel OnGuard security monitoring system, the company's access control system. To assess the reliability of data from this system, we compared data fields to the data entered to determine reasonableness. We also tested reliability by attempting access on selected card readers and then comparing our attempts to the data collected by the system. Further, the

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system administrator was not aware of any known data reliability issues. Based on these efforts, we determined that the data were reliable for the purposes of our audit.

Prior Audit Reports

In conducting our analysis, we reviewed and used information from the following Amtrak OIG reports:

- *AMTRAK: Top Management and Performance Challenges—Fiscal Years 2017 and 2018* (OIG-SP-2017-009), March 29, 2017
- *Governance: Addressing Remaining Shortcomings Would Lead to a Budget Development Process More Fully Aligned with Leading Practices* (OIG-A-2017-004), January 17, 2017
- *Information Technology: Progress Made Installing Video Surveillance Systems, But Coverage and Performance Could Be Improved* (OIG-A-2016-010), August 9, 2016

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APPENDIX B

Results of the Physical Security Focus Groups

This appendix summarizes the results of our focus groups of 94 employees who work at the station and in the yard in Philadelphia. Table 1 shows the participants' responses to our questionnaire.

Table 1. Questionnaire Responses

Statement	Responses		
	0%	25%	50%
Overall, Amtrak provides adequate physical security in and around where I work. (91 responses)			
The security of Amtrak's assets, infrastructure, employees, and passengers is my responsibility. (92 responses)			
Senior Amtrak leadership communicates the importance of security as a key strategic goal. (94 responses)			
My Amtrak training has made me more aware of security issues I may encounter. (94 responses)			
Amtrak effectively uses gates, fencing, or other physical barriers in and around areas where I work. (93 responses)			
Amtrak effectively uses access control (badge access) in and around where I work. (92 responses)			
Amtrak effectively uses video surveillance in and around where I work. (92 responses)			

Source: OIG analysis of questionnaire responses as of August 2017

Certain information in this report has been redacted due to its sensitive nature.

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Figure 8 summarizes the topics that focus group participants discussed when we asked them about their security concerns. The figure includes topics that participants raised at least three times. The larger the font, the more frequently the topic was discussed across all focus groups.

Figure 8. Focus Group Responses on Security Vulnerabilities

What are the biggest security concerns you have in your work area?

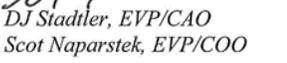


Source: OIG analysis of focus group participant responses in open forum discussions as of August 2017

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APPENDIX C

Management Comments

NATIONAL RAILROAD PASSENGER CORPORATION	
<h1 style="font-size: 2em; margin: 0;">Memo</h1>	  
Date <i>April 11, 2018</i>	From <i>DJ Stadler, EVP/CAO</i> <i>Scot Naparstek, EVP/COO</i>
To Stephen Lord, Assistant Inspector General, Audits	Departments <i>Administration and Operations</i>
	cc <i>Ken Hylander, EVP Chief Safety Officer</i> <i>Gery Williams, VP Chief Engineer</i> <i>Susan Reinertson, AVP Emergency Management and Corporate Security</i> <i>Neil Trugman, AVP Chief of Police</i> <i>Robin McDonough, VP HR</i> <i>Bill Feidt, EVP Finance</i> <i>Carol Hanna, VP Finance</i> <i>Mark Benedict, Director Amtrak Controls</i>
Subject Management Response to <i>SAFETY AND SECURITY: Longstanding Physical Security Vulnerabilities in Philadelphia Pose Risks</i> (Draft Audit Report for Project No. 005-2017)	
<p>This memorandum provides Amtrak's response to the audit report for project no. 005-2017 entitled, "SAFETY AND SECURITY: Longstanding Physical Security Vulnerabilities in Philadelphia Pose Risks". Management appreciates the opportunity to respond to the OIG recommendations. As indicated in our responses, we agree with each of the OIG recommendations and have initiated actions to address each in a timely manner.</p>	
<p><u>Recommendation 1.1:</u></p>	
<p>Initiate a plan to address the security vulnerabilities we identified in Philadelphia by establishing clear roles and lines of accountability, resources, and performance metrics to ensure the following:</p>	
<p style="padding-left: 40px;">Exterior and interior station doors can be properly secured when needed, including maintaining key inventories, regularly repairing locks and card readers, and periodically changing lock combinations.</p>	
<p><u>Management Response/Action Plan:</u></p>	
<p>Given the multiple departments, intertwined actions, level of coordination across departments, and implementation timeline, management is reviewing the possibility of having Amtrak's Enterprise Program Management Office (EPMO) manage all action plans in this report as one comprehensive project. However, approval for EPMO to include this project in its portfolio is contingent on several internal Amtrak processes. Amtrak standard PMO processes will be followed to include</p>	
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documentation of responsibilities, scope and deliverables associated with the project. Regardless of department, the selected project manager will ensure effective coordination and collaboration is followed to manage this project with the desired deliverables in a timely and efficient manner. Should management not be allowed to move forward with this approach, the Action Plan Lead will work with the other responsible Amtrak officials to document a project management plan, to include all of the actions that will be pursued by the multiple departments of this response, and designate an employee to manage implementation of the project plan. Currently, specific action items in response to the recommendation are underway, such as engineering is developing designs to secure access points and will work with EMCS, APD, Real Estate and Transportation to implement solutions. Moving forward Real Estate will take over ownership of and update the current Facilities Standards policy (P/I #3.22.0) to document that they are the party accountable for ensuring compliance with the policy and the policy will include physical security standards. This policy will also reference the identification of a facility manager that is responsible for monitoring the operational use of the station and coordinating responsibilities with other key Amtrak stakeholders to include: ensuring that station doors and access points are secured at all times; security responsibilities for themselves and stakeholders, including maintaining key inventories; regularly repairing locks and card readers; and providing specific guidance on when lock combinations should be changed. The policy will be distributed through an Employee Communication and posted to Amtrak Policy and Instruction Manual (APIM). Moving forward Real Estate and Engineering will identify funding for card readers needed to secure vulnerable access points. EMCS will install card readers and ensure compatibility with current access control equipment.

Responsible Amtrak Official(s):

Administration/Real Estate (DJ Stadtler, Action Plan Lead), Engineering (Gery Williams), Transportation (Mike DeCataldo), APD (Neil Trugman), and EMCS (Susan Reinertson)

Target Completion Date:

December 2018

Recommendation 1.2:

Initiate a plan to address the security vulnerabilities we identified in Philadelphia by establishing clear roles and lines of accountability, resources, and performance metrics to ensure the following:

Frontline staff have basic physical security training so they can effectively contribute to the company's security efforts.

Management Response/Action Plan:

EMCS is in the process of updating Amtrak's Security Awareness computer-based training (CBT) module to ensure relevant physical security protocols are incorporated. APD will provide input on content and, as they have in the past, will be included in various segments of the training module. While the CBT is under development, Safety Compliance & Training and Transportation will work with Human Resources (HR) to identify the best way to provide security CBT, or another delivery method, to frontline staff. As several front line employees do not have access to a computer or an Amtrak email address to

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access CBT courses, additional training delivery options will need to be explored to identify how to best provide security training to front line staff. The responsible officials/departments listed below will conduct a series of joint meetings to evaluate delivery methods/implementation and provide the OIG with a quarterly status of progress. Lastly, the security component of Amtrak's Service Standards Manual for Transportation Service and On-Board-Service (version 10.1, October 2017), will be updated to include components of the new security training course.

Responsible Amtrak Official(s):

Safety Compliance & Training (Justin Meko, Action Plan Lead), Transportation (Mike DeCataldo), Administration/HR (Robin McDonough, APD (Neil Trugman), and EMCS (Susan Reinertson)

Target Completion Date:

March 2019

Recommendation 1.3:

Initiate a plan to address the security vulnerabilities we identified in Philadelphia by establishing clear roles and lines of accountability, resources, and performance metrics to ensure the following:

Company badges are issued, collected, and deactivated as appropriate.

Management Response/Action Plan:

EMCS will document employee ID monitoring in its Access Control Standard Operation Procedures (SOP) document (currently under review) and revise the current Smart ID policy (P/I # 3.15.1) to reflect that change. The Access Control SOP is part of EMCS's Management Control Framework (MCF). The Amtrak HR/EMCS Smart ID issuance and deactivation processes are generally performing as designed. As of February 8, 2018, the automatic maximum active badges per cardholder in Amtrak's access control system was programmed to ensure that a cardholder is only allowed to have one active badge at a time as opposed to its original setting of two badges. EMCS will support the HR policy and practice of requiring supervisors and managers to collect badges by developing an automated process that will regularly inform HR of IDs that have been deactivated but not collected and destroyed by EMCS. Once the automated notification process is implemented, where HR will regularly receive updates on IDs deactivated but not collected and destroyed by EMCS, we will have the HR Generalists follow up with departments to collect and/or turn in the badges. It is important to note that while automated deactivation of badges occurs immediately, collection and destruction of badges will never achieve 100% success rate.

Responsible Amtrak Official(s):

EMCS (Susan Reinertson, Action Plan Lead) and Administration/HR (Robin McDonough)

Target Completion Date:

December 2018

Recommendation 1.4:

Initiate a plan to address the security vulnerabilities we identified in Philadelphia by establishing clear roles and lines of accountability, resources, and performance metrics to ensure the following:

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Perimeter fencing is repaired, gates are installed, and parking restrictions are enforced at the yard.

Management Response/Action Plan:

APD will ensure their patrols include these areas, officers will report vehicles to be towed, and security vulnerabilities requiring physical repairs are reported to Real Estate's designated facility manager and EMCS. Real Estate will evaluate protocols to enforce parking restrictions and that employee vehicles properly display the required permit. In Real Estate's new role of overseeing facility standards the facility manager will conduct bi-annual facility audits, including perimeter areas, fencing and gates. Real Estate will work with Engineering to identify funding and oversee implementation of fencing repairs and gate installations at Philadelphia.

Responsible Amtrak Official(s):

Administration/Real Estate (DJ Stadtler, Action Plan Lead), EMCS (Susan Reinertson), APD (Neil Trugman) and Engineering (Gery Williams)

Target Completion Date:

March 2019

Recommendation 1.5:

Initiate a plan to address the security vulnerabilities we identified in Philadelphia by establishing clear roles and lines of accountability, resources, and performance metrics to ensure the following:

Video surveillance systems are regularly repaired and maintained.

Management Response/Action Plan:

EMCS will update the current Video Surveillance System (VSS) policy (P/I # 3.24.1) to include a repair and maintenance protocol and guidance on when and where to report inoperable cameras. The policy will document Real Estate's role (via facility management) to inspect facilities to ensure physical security solutions are operational. This information will also be included in the VSS Standard Operating Procedures (SOP) that is currently under revision and part of EMCS's Management Control Framework (MCF). Currently EMCS monitors the cameras at Philadelphia via the Genetec system. The existing system in Philadelphia is maintained through the engineering department, however facility management will be brought up to speed on the current VSS system in Philadelphia so that they can appropriately report VSS issues to EMCS accordingly. By the end of the fiscal year 2018, a new camera analytic will be deployed to better diagnose camera failures and changes in view. The new program, KIWI, will send automated messages to alert administrators of camera failures or changes to view. Of the [REDACTED] cameras, [REDACTED], failing cameras are located in the Penn Coach Yard on wireless links that require a redesign. A plan for moving the existing wireless cameras to fiber is under review by EMCS and Engineering.

Responsible Amtrak Official(s):

EMCS (Susan Reinertson, Action Plan Lead), Administration/Real Estate (DJ Stadtler), and Engineering (Gery Williams)

Target Completion Date:

December 2018

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APPENDIX D

Acronyms and Abbreviations

9/11 Commission Act of 2007	Implementing Recommendations of the 9/11 Commission Act of 2007
APD	Amtrak Police Department
EMCS	Emergency Management and Corporate Security department
FY	fiscal year
NJT	New Jersey Transit
OIG	Amtrak Office of Inspector General
Real Estate	Real Estate, Stations, and Facilities department
SEPTA	Southeastern Pennsylvania Transportation Authority
the company	Amtrak
VSS	video surveillance system

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APPENDIX E

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OIG MISSION AND CONTACT INFORMATION

Mission

The Amtrak OIG's mission is to provide independent, objective oversight of Amtrak's programs and operations through audits and investigations focused on recommending improvements to Amtrak's economy, efficiency, and effectiveness; preventing and detecting fraud, waste, and abuse; and providing Congress, Amtrak management, and Amtrak's Board of Directors with timely information about problems and deficiencies relating to Amtrak's programs and operations.

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