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INDEPENDENT STATE AUDITOR'S REPORT ON CERTAIN ACTIVITIES OF THE MASSACHUSETTS TURNPIKE AUTHORITY'S EMERGENCY MANAGEMENT PROGRAM JUNE 1, 2002 THROUGH DECEMBER 31, 2004

OFFICIAL AUDIT REPORT

DECEMBER 5, 2005

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The Massachusetts Turnpike, or Interstate 90 (I-90), is 138 miles long and spans Massachusetts from West Stockbridge, on the New York border, to Logan Airport, in East Boston, and Route 1A. The Turnpike is actually two highway systems: the original Massachusetts Turnpike, which opened in 1957, and the Metropolitan Highway System (MHS), which the Massachusetts Legislature created in 1997.

The original Massachusetts Turnpike runs 123 miles, between the New York border and Interchanges 14 and 15 at Route 128/Interstate 95 (I-95) on the Weston-Newton town line. The MHS Extension to Boston runs for 15 miles, between Route 128/I-95 and Logan Airport/Route 1A, through the Ted Williams Tunnel and the I-90 Connector.

The Massachusetts Turnpike Authority (MTA), created by an act of the Legislature in 1952, operates on toll revenue, supplemented with revenue from leasing, development of land and air rights, and advertising. The MHS law assigned to the MTA the responsibility of overseeing the Central Artery/Ted Williams Tunnel (CA/T) Project, which is scheduled to be fully operational in 2005. All CA/T roadways will become part of the MHS.

Our review of the Emergency Management Program in place at the MTA disclosed that, although a significant amount has been accomplished to date, the Authority's plans to enhance and update the program are pending. The Authority should activate its plan so as to fully demonstrate and codify what protective actions it has taken and will take to ensure it can prevent, respond to and recover from threats to its critical assets and the public using its roadways.

INTRODUCTION

Background

The State Homeland Security Strategic Plan

The State Homeland Security Strategic Plan for the Commonwealth of Massachusetts sets forth how state government will work in partnership with the federal, regional, and local levels and the private sector to detect, prevent, respond to, and manage the effects of terrorist acts and other critical incidents. The plan takes into account the results of a statewide inventory of homeland security activities conducted by the Executive Office of Public Safety (EOPS) in spring 2003 and a statewide security assessment of the risk, capabilities, and needs that was completed by local entities in the latter part of 2003. The plan also incorporates the results of a threat, vulnerability, and risk assessment coordinated by the Massachusetts State Police.

Federal funding of about $59 million, $68 million, and $62 million was provided to the state in fiscal years 2003, 2004, and 2005, respectively, to offset the cost of planning activities, acquire equipment and technology, develop training programs, plan and conduct training exercises, and fulfill other purposes expressly authorized by the federal government.

The Governor designated the Secretary of EOPS as the state's Homeland Security Advisor, responsible for establishing a working partnership with various disciplines within federal, state and local government (law enforcement, fire, emergency medical, emergency management, transportation, healthcare, general services, environmental, etc.) and private sector entities to carry out this function and coordinate activities through a Homeland Security Executive Committee composed of various state cabinet departments.[1]

The State Homeland Security Strategic Plan sets forth the following five goals for the Commonwealth:

1. Enhancing the ability to assess risk and prevent future terrorist attacks or critical incidents

[1] Department of Fire Services, Executive Office of Public Safety, Department of Public Health, Massachusetts State Police, Criminal History Systems Board, MBTA Transit Police Department, Massport, Executive Office of Transportation and Construction, the National Guard, Massachusetts Aeronautics Commission, and the Massachusetts Emergency Management Agency. Additionally, the Metropolitan Boston Urban Area Security Initiative has appointed a representative to serve on the Homeland Security Executive Committee.

2. Improving the ability to collect, analyze, disseminate, and manage key information
3. Improving preparedness by enhancing regional coordination
4. Improving the ability of first responders to communicate at the scene of a terrorist attack or other critical incident
5. Improving the ability to recover from a terrorist attack or other critical incident

The plan elaborates each of those goals and identifies EOPS as the responsible party for conducting reviews of the progress being made to implement the goals, objectives, and steps of the plan.

Massachusetts Turnpike Authority

The Massachusetts Turnpike, Interstate 90 (I-90), is a 138-mile-long roadway that spans Massachusetts from West Stockbridge, on the New York border, to Logan Airport, in East Boston, and Route 1A. The Turnpike is actually two highway systems: the original Massachusetts Turnpike System, which opened in 1957, and the Metropolitan Highway System (MHS), which the Massachusetts Legislature created in 1997.

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State Police Role and Coverage

Massachusetts State Police Troop E provides security coverage for all operating areas of the MTA, including the CA/T. Assigned exclusively to and funded entirely by the MTA, Troop E is composed of 163 officers at five locations throughout the MTA: Westfield, Charlton, Weston, and two locations at the CA/T (South Boston: Ted Williams Tunnel and the Operations Control Center [OCC]). Approximately half of Troop E's assets are deployed at the CA/T.

Troop E has used a three-layer strategy at the CA/T. The first layer involved segmenting the Project into five sectors: Brighton to CA/T, the Ted Williams Tunnel, the Sumner and Callahan Tunnels, lower I-93 to Northern Avenue, and Northern Avenue to the Central Artery North Area (CANA) Tunnels. Each sector is covered 24/7 by Troop E cruisers.

The second layer is the responsibility of the Weston HQ location, in the form of State Police motorcycles and the Commercial Vehicle Equipment unit, a truck that has hazardous material management as well as truck measurement and inspection capabilities. These units cover all five sectors and are stationed at positions according to anticipated demand throughout the day. According to Troop E officials, the motorcycle unit is critical to security operations because of its ability to place officers in areas that become inaccessible to cruisers due to traffic congestion or accidents.

The third layer is the responsibility of the Emergency Response System (ERS), controlled at the OCC in South Boston. Project traffic engineers identified several sites throughout the CA/T to position ERS personnel (MTA employees operating tow trucks, and the State Police units described earlier) to respond to traffic incidents and emergencies. When an incident is observed, such as a stopped vehicle on the roadway, ERS personnel are immediately dispatched to surround, identify, and remove the vehicle or other hazard. Although this response was originally designed for safety and environmental concerns, Troop E Command believes it constitutes an effective security response as well.

In response to the September 11, 2001 attacks, the MTA took a series of actions to address the threat of attack on the roadways, bridges, tunnels, and other assets under its jurisdiction. The MTA's Emergency Management Program codifies the actions it will take to prevent, respond to, and recover from varying degrees of threats or emergencies. The program includes five components: Hazard Identification and Risk Assessment, the Emergency Management Plan, Standard Emergency Operating Procedures, Training, and Drills and Exercises.

Audit Scope, Objectives, and Methodology

The objective of this audit was to review the status of MTA's Emergency Management Program efforts to identify and mitigate security risks to roadways, bridges, and tunnels so as to protect the MTA's considerable assets and the people who use them. To accomplish our objectives, we

reviewed applicable laws, regulations, and internal policies and procedures, as well as the MTA's prior vulnerability assessments and its Emergency Management Program, consisting of five component parts: Hazard Identification and Risk Assessment (HIRA), the Emergency Management Plan, Standard Emergency Operating Procedures, Training, and Drills and Exercises (See Appendix). We also interviewed MTA officials and visited several of its facilities.

Our audit, which covered the period June 2002 through December 2004, was conducted in accordance with applicable generally accepted government auditing standards and included audit tests and procedures that we considered necessary under the circumstances.

AUDIT RESULTS

PROGRESS IN IMPLEMENTING THE EMERGENCY MANAGEMENT PROGRAM, ADDITIONAL ENHANCEMENTS NEEDED AND PLANNED

Our review of the Emergency Management Program in place at the MTA disclosed that, although a significant amount has been accomplished to date, the Authority's plans to enhance and update the program are pending. The Authority should activate its plan so as to fully demonstrate and codify what protective actions it has taken and will take to ensure it can prevent, respond to and recover from threats to its critical assets and the public using its roadways.

MTA's Emergency Management Program has five components: Hazard Identification and Risk Assessment, the Emergency Management Plan, Standard Emergency Operating Procedures, Training, and Drills and Exercises.

a. Hazard Identification and Risk Assessment

Early Vulnerability Assessment Initiatives

Following the Sept. 11, 2001 terrorist attacks, the MTA assembled a security task force to develop preventative and responsive actions regarding threats or attacks against the critical roadways, bridges and tunnels under its jurisdiction.

The MTA had an initial terrorism vulnerability analysis completed by an external consultant, Total Security Services International, Inc. (TSSI), in March 2002. TSSI's initial report outlined areas of vulnerability and recommended various actions to mitigate them.

MTA also requested that the Massachusetts State Police conduct a threat assessment and analysis of the MTA and selected facilities close to the Turnpike. That analysis, including a list of vulnerabilities and a corresponding list of recommendations, was provided to the MTA on July 19, 2002.

A second State Police vulnerability assessment was prepared in April 2003. A primary result of this assessment was the creation of a prioritized list of vulnerable sites. The list was compiled using information from the previous State Police and TSSI vulnerability assessments.

A third State Police vulnerability assessment was prepared in December 2003 in response to a request from the Executive Office of Public Safety (EOPS). The December 2003 report is a revised version of the assessment completed in April 2003. The revisions provided a narrative regarding the status of the MTA Emergency Management Program.

As a result of the above assessments and other initiatives, the MTA took a number of actions to mitigate identified vulnerabilities, such as:

- Expansion of the State Police emergency response system
- Controlling access to the Prudential Tunnel passageways
- Development of a project-wide security system
- Providing Authority-wide terrorism training
- Development of an Emergency Response Plan
- Appointment of a Security Director

The Authority advised us that they are confident that because of their existing and evolving program, they are in a constant state of readiness to protect its critical infrastructure and the public that utilizes its roadways and tunnels.

Hazard Identification and Risk Assessment Initiative

Based on the TSSI and State Police vulnerability assessments and the resulting mitigation actions, the MTA, with the assistance of a security consultant, Fortress Inc., produced a more comprehensive Hazard Identification and Risk Assessment (HIRA) Plan. The HIRA document prioritizes a list of 44 critical areas and identifies 25 types of natural and manmade hazards. The HIRA was completed on November 1, 2003, and is the first component of the MTA's Emergency Management Program.

The HIRA covers three phases—pre-assessment, assessment, and post-assessment—for identifying and mitigating the potential security issues facing the MTA. The pre-assessment and assessment phases have been completed, and the vulnerabilities identified and prioritized. However, the post-assessment phase, which calls for the identification of what

additional mitigation and countermeasures are needed, has not yet been completed. MTA officials advised the OSA that notwithstanding the measures already taken to address vulnerabilities earlier identified by the Massachusetts State Police and Total Security Services International (TSSI), an updated vulnerability analysis must be performed before this phase can be completed.

After the Federal Highway Administration (FHWA) and the United States Department of Homeland Security (DHS) completed a site assistance visit in June 2004, (prior to the Democratic National Convention), the Authority was encouraged to utilize FHWA/DHS services to conduct a comprehensive vulnerability assessment, utilizing a new assessment standard that was being developed at the time. That standard is known as the Risk Assessment Methodology for Critical Asset Protection (RAMCAP). FHWA/DHS agreed to conduct an assessment that would assist the Authority in updating the HIRA and developing its mitigation plan. MTA officials advised the OSA that because the FHWA/DHS were scheduled to conduct a vulnerability assessment of MTA's critical infrastructure in December 2004 utilizing the new federal standards, it would make sense to complete that assessment first and receive their mitigation recommendations before MTA updates its mitigation plan.

The Authority expects to receive a report on that assessment by mid-April 2005, at which point a consultant will be contracted to review all assessments conducted, and to work with relevant MTA departments and Troop E to codify all mitigation, countermeasure, and security actions taken, to be taken, or desired for future planning, and will form the basis of MTA's HIRA and mitigation plan to be updated in May/June 2005.

According to the MTA, the first cycle of its Emergency Management Program commenced in the summer of 2003 when work to develop the HIRA, the Emergency Management Plan, and Standard Emergency Operating Procedures was undertaken. Those three elements of the program were completed between October and December 2003. The other two elements of the first cycle were completed between June and July 2004, with the conduct of a management training program and an internal multi-department drill.

Further, MTA advised us that the second full cycle commenced in December 2004 with the conduct of the FHWA/DHS Assessment. According to MTA, the entire program is updated sequentially because of the interrelatedness of the program components and revisions to the mitigation strategy which may require changes in the Emergency Management Plan, the Standard Emergency Operating Procedures, Training or Drills and Exercises. However, they stated that the entire Emergency Management Program will be updated in 2005.

Observations

The MTA advised us that the November 2003 HIRA is incomplete and acknowledges that it has not yet completed a mitigation plan that documents all actions MTA has taken, plans to take, and would like to take to address the vulnerabilities. The MTA should ensure that the HIRA goal of identifying and mitigating all identified risks is completed quickly and the results are formalized. Currently, the CA/T Project is installing a project-wide security system to replace an earlier version that was discontinued before it was completed.

b. Emergency Management Plan

In December 2002, the MTA completed a draft of its first Emergency Management Plan (the second component of the Emergency Management Program). It identifies roles and responsibilities for each division of the MTA in responding to threats, hazards, or incidents, before, during, and after an emergency. In April 2003, an external consultant completed a review of this document using the Federal Emergency Management Agency's (FEMA's) Capability Assessment for Readiness (CAR) evaluation standard. CAR is composed of 13 emergency management functions that are used to assess the level of readiness of an emergency management program. The MTA reviewed the consultant's recommendations, implemented an improvement strategy to address the recommendations, and issued its revised Emergency Management Plan in December 2003. It is to be reviewed and updated annually along with the division annexes that detail division-specific tasks i.e., the Standard Emergency Operating Procedures discussed below.

Observations

Although the Emergency Management Plan discusses the implementation of an Emergency Operations Center and a Disaster Recovery Center to be located in a facility west of the city, such a facility has yet to be funded or established. The MTA had hoped to have both facilities operational within five years after approval of its five-year capital plan. In the meantime, the MTA has designated another location as the Emergency Operations Center, and the disaster recovery activities—e.g., the storage of computerized and other data, will continue to be carried out under contract with a private firm.

The Emergency Management Plan should focus on current operational practices using existing facilities. Future required updates to the Plan should incorporate significant changes to the Plan, as new facilities, etc., are brought on-line. Also, the Plan calls for Troop E of the State Police to develop a plan to conduct annual drills and exercises to test the MTA's readiness and response and recovery protocols, involving all direct-response divisions of the MTA and those that support direct response activities. There is no formal plan to conduct annual drills and exercises to test each MTA division's readiness, response and recovery protocols, and standards. However, Troop E advised us that they did provide some additional anti-terrorism instruction to their troopers and have held some emergency response training drills. The Plan should be monitored for compliance and updated when practices are changed.

As of December 2004, the December 2003 Plan had not been updated. In commenting on the report, MTA advised us that the Plan was completed in October/November 2004, and would be updated in the May/June 2005 timeframe [of about one and a-half years after completion of the original plan.] It is our opinion that whether the plan is annually updated totally, or sequentially by section, the schedule should be formalized so that management can monitor the annual progress being made to implement the program. MTA also advised us that the updated plan will reflect the alternate arrangements made to cover the Emergency Operations Center and the Disaster Recovery Center. In addition, MTA officials stated that the plan will be amended to make the Director of Security responsible for overseeing drills and exercise planning, and that plans are being made to assign thirteen emergency functions to different personnel within the organization. The plan will also be revised using the new

standards recently developed by the federal government. The above actions should contribute to keeping the plan current and complete.

c. Standard Emergency Operating Procedures (SEOP's)

MTA developed its SEOP's (the third component of the Emergency Management Program) between October and November 2003 that describe the actions to be taken in the event of an emergency. Specifically, each of the nine functional MTA divisions, including State Police Troop E, has (1) pre-emergency, (2) emergency, and (3) post-emergency SEOP's. The pre-emergency procedures include identifying the job position responsible for that particular emergency function, ensuring that the necessary mitigation and recovery operations are in place, and that the relevant division personnel receive appropriate training and regularly scheduled drills and exercises. The emergency SEOP's include guidelines for activities such as mobilizing the Emergency Operations Center, assessing emergency resource needs, and providing operational support. The post-emergency SEOP's identify activities required to ensure participation in formal post-disaster discussions and assessments, and they provide guidance for recovery and restoration. They are also intended to ensure that lessons learned in an emergency are incorporated into the appropriate elements of the Plan.

In June 2004, the MTA initiated an emergency management training program for division heads and their direct reports - - a total of 37 individuals that have primary responsibility for emergency operations. The program included an overview of the Emergency Management Plan and the SEOP's that are included in each division's annex to the plan.

Observations

The SEOP's contain a checklist of pre-emergency activities required of each MTA operational division. At the time of our review, MTA had not developed a schedule for presenting the Emergency Management Plan and SEOP's to other managers, supervisors and field personnel. We were advised in March 2005 of MTA's intention to present the training program to other managers, supervisors and relevant field personnel during the July/September 2005 time period. The training will be division specific and will review current and/or revised Standard Emergency Operating Procedures. This training will take place about 20 months after its initial development.

d. Training

The Emergency Management Plan (the fourth component of the Emergency Management Program) that was presented to the MTA division heads and direct reports in June 2004 calls for organization-wide training in the following areas: terrorism awareness, Emergency Management Program overview, event classification and notification process, Standard Emergency Operating Procedures, activating the Emergency Operations Center and Public Information Center, and facility familiarization and safety inspections for fire, emergency medical services and others prior to the opening of new CA/T roadway sections.

During 2002, the MTA management contracted with TSSI to conduct an anti-terrorist awareness-training program for all field personnel who were in a position to observe operational areas. The training was presented, at various times, to 1,063 personnel in diverse MTA areas, including operations, maintenance, administration, and toll collection. The two-hour program was designed to identify terrorist threats against America's transportation systems and teach personnel how to identify and respond to terrorist behavior and acts.

As of December 2004, the Emergency Management Plan had been formally presented to MTA division heads and their direct reports (a total of 37 individuals), terrorism training had been conducted, and familiarization and safety inspections had been undertaken. The remaining elements of the training program have not been implemented.

Observations

Training implemented to date included a two-hour anti-terrorist awareness-training program, the above mentioned overview presentations to senior management, and familiarization and safety inspections. Training has not yet been provided to all relevant personnel on the elements of the Emergency Management Program, the event classification and notification process, the SEOP's, and the activation of the Emergency Operations and Public Information Centers. In commenting on this report, MTA officials advised us that in October and November of 2005, training was held to include an overview of the National Incident Management System, the Emergency Management Program and Plan, advisory and event classification protocols, and also terrorism awareness as well as Chemical, Biological, Nuclear and Explosive Terrorist training for 170 managers, supervisors and other relevant personnel.

e. Drills and Exercises

Drills and Exercises, (the fifth component of the Emergency Management Program) calls for four types of activities designed to provide practical experience in the application of the SEOP's and provide data to revise and improve the overall program.

1. Table-top discussions—scenario-driven discussions among key personnel
2. Notification drills—conducted both on and off hours, to test the response to a notification
3. Functional drills—involving a scenario that tests a single internal function, such as security, fire, communications, etc.
4. Integrated exercises—involving a scenario that tests multiple organization functions

Beginning in 2004, the MTA participated in two tabletop exercises to coordinate emergency response activities involving multiple local, state, and federal agencies. The first was coordinated by the United States Secret Service in preparation for the Democratic National Convention; the second was conducted by EOPS as part of the State Homeland Security Strategic Plan. Also, in July 2004, the MTA conducted a notifications and communications drill, with consultant support from Fortress, Inc. We were also advised that Troop E is planning to conduct a series of tabletop exercises during April 2005. Further, MTA plans to participate in drills and exercises coordinated by and with other jurisdictions. MTA officials also advised us that responding to everyday incidents on a daily basis provides training and allows them to measure responses similar to formal training and exercises. For example, Troop E State Police often work in coordination with the Authority's Maintenance Department, the Operations Control Center, the Boston Fire Department and Boston Emergency Medical Services in responding to critical roadway incidents.

Observations

The MTA has not conducted the functional and integrated drills and exercises called for in the Emergency Management Plan. MTA officials, in commenting on this report, advised us that they plan to conduct an advanced drill in September/December 2005 in their continuing effort to fully activate their plan. They also plan to conduct an internal multi-

department full-agency exercise on an annual basis that tests their readiness, response and recovery protocols.

f. Unmet Needs

According to the MTA, it has spent $11,903,640 on homeland security. Included in this amount is approximately $6 million under contract C22A9 for the "hardening" of 18 MTA facilities by installing a total of 127 cameras and 320 contact alarms at the seven vent buildings, the Zakim/Bunker Hill Bridge, various air intakes, electrical substations, and four emergency-response stations. The $6 million contract is scheduled for completion in June 2005. Also, the MTA filled the position of Security Director in July 2004. The following is a summary of the MTA's emergency management costs through July 2004:

Post-9/11 Security of Infrastructure	$ 4,000,000
MHS Surveillance /C22A9	6,000,000
Prudential Center Roadway Surveillance	1,500,000
TSSI Vulnerability Analysis	50,000
TSSI Terrorism Awareness Training	82,000
EMP Review by Fortress	18,000
EMP Assistance Contract	70,000
DNC Security Costs	183,640
Total	$11,903,640

Sources: MTA Emergency Management Plan Activity Timeline and Pending Policy Actions, April 2004; MTA memo to Office of the State Auditor, December 2004.

According to MTA, the terms of the 2003 Homeland Security Grant Program did not provide for them to seek funding for some of the incurred costs. However, in June and July 2004, the MTA submitted proposals under the Homeland Security Grant Program to EOPS, requesting $2,378,340 (of the $68 million of Federal funds available to the Commonwealth in F.Y. 2004) to further develop the MTA security strategy and emergency response plans and to provide security equipment to enhance the systems currently in place. The following is a summary of the MTA-identified unmet needs and the amounts requested:

Grant Proposal	Requested Funding
Updating the Hazards Identification and Risk Assessment Plan	$50,000
Conducting Training and Exercises	50,000
Updating the Disaster Recovery Plan	155,000
Procuring Digital Video Recorder Technology	123,340
Enhancing Video Detection Systems	1,000,000
Acquiring Mobile Vehicle Inspection Unit	1,000,000
Total	$2,378,340

Observations

On December 6, 2004, EOPS notified the MTA that it would not receive funding under the fiscal year 2004 Homeland Security Grant Program. Accordingly, these MTA-identified needs remain unmet.

Conclusion

Our review of the Emergency Management Program at the MTA disclosed that, although much has been accomplished to date, some additional enhancements are needed and planned. The MTA has taken steps since September 11, 2001 to identify its vulnerabilities, including studies by outside consultants and assessments by the State Police. The MTA also developed its Emergency Management Plan, which was issued in December 2003. The Plan, the HIRA and SEOP's that the relevant divisions will use in an emergency, are to be reviewed and updated annually.

As of December 2004, the Plan had not been updated and contained references to facilities that have not yet been funded or established. Also, although a prioritized listing of vulnerable sites has been identified in the HIRA, according to MTA officials the listing needs updating and the additional mitigation and countermeasures that might be employed at these sites have not been codified.

Although the Emergency Management Plan calls for organization-wide training in specific areas, that training has not been provided in all areas. Also, although the SEOP's are in place, the MTA has not implemented a schedule to present them to all of its managers and relevant employees. Moreover, the Program's Drills and Exercises portion, which tests the readiness and

response and recovery protocols of the various functional and integrated components, has not been fully complied with.

In an attempt to overcome some of these shortcomings, the MTA submitted a proposal for Homeland Security Grant funds that would be used for among other things, updating the HIRA and conducting Training and Exercises. EOPS notified the MTA on December 6, 2004 that it would not receive funding under the fiscal year 2004 Homeland Security Grant Program. Accordingly, the MTA-identified needs remain unmet.

At the conclusion of our audit, MTA advised us that further development of the Emergency Management Plan is pending completion of the new vulnerability assessment with FHWA/DHS assistance. We were further advised that the entire Emergency Management Program will be updated in 2005.

Recommendations

To maintain an operable and viable security program, the MTA Chairman should ensure that:

- Firm timelines are in place, and adhered to, for updating the Emergency Management Plan, the HIRA, and the SEOP's
- A detailed schedule of planned Training, Drills and Exercises is prepared that identifies the specifics of these initiatives as to topics, dates, organizational units participating, etc.
- A formal monitoring program is in place to assure that the Emergency Management Program is functioning as management intended.
- Efforts continue to secure Homeland Security funding for this critical component of the Commonwealth's highway system.

Auditee's Response

In commenting on the report, MTA officials extended their appreciation for the level of interest expressed by the OSA in this program, and the time and effort committed to the review. MTA officials advised us that their general conclusion is that the report, in noting that certain program enhancements have not been implemented, may not have fully recognized the ongoing sequential and systematic nature of its program and planning. They went on to state that:

> *[MTA's] program is made up of five components, and it is designed to constantly evolve as we complete a cyclical and sequential review and assessment of each one of those*

components. That evolution has been and will continue to be impacted by numerous factors, including constraints on capital planning, the lack of access to anticipated external funding, the scheduling of federal assessments, and the development of new federal standards that affect the shape and scope of those program components.

Auditor's Reply

We have reviewed the areas of concern raised by the MTA officials and added information where we deemed it appropriate. We have also noted the appropriate sections of the report where MTA has established timelines to ensure that the five functional activities of the Emergency Management Program are updated. This action is commendable. Insofar as the second and third recommendation, we continue to believe that a detailed schedule of Training, Drills and Exercises and a formal monitoring system should be in place to provide the Chairman with assurance that the Emergency Management Program is meeting its milestones and functioning as management intended.

APPENDIX

MTA Emergency Management Program