

**TSA Did Not Assess Its  
Explosives Detection Canine  
Team Program for Surface  
Transportation Security**






## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

August 4, 2021

MEMORANDUM FOR: The Honorable David P. Pekoske  
Administrator  
Transportation Security Administration

FROM:   
Joseph V. Cuffari, Ph.D.  
Inspector General

SUBJECT: *TSA Did Not Assess Its Explosives Detection Canine Team Program for Surface Transportation Security*

For your action is our final report, *TSA Did Not Assess Its Explosives Detection Canine Team Program for Surface Transportation Security*. We incorporated the formal comments provided by your office.

The report contains two recommendations aimed at improving TSA's Explosives Detection Canine Team program. Your office concurred with both recommendations. Based on information provided in your response to the draft report, we consider both recommendations open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions. Please send your response or closure request to [OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Bruce Miller, Deputy Inspector General for Audits, at (202) 981-6000.



# DHS OIG HIGHLIGHTS

## ***TSA Did Not Assess Its Explosives Detection Canine Team Program for Surface Transportation Security***

**August 4, 2021**

### **Why We Did This Review**

We conducted this review to determine the extent to which TSA has evaluated its EDCT program and has met the intent of the requirements in the *FAA Reauthorization Act of 2018*, as part of developing and implementing its surface transportation risk-based security strategy.

### **What We Recommend**

We made two recommendations to improve TSA's EDCT program.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 981-6000, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### **What We Found**

The Transportation Security Administration (TSA) partially complied with the *FAA Reauthorization Act of 2018* (Act) by establishing operational processes for routine activities within its Explosives Detection Canine Team (EDCT) program for surface transportation. Specifically, TSA has a national training program for canines and handlers, uses canine assets to meet urgent security needs, and monitors and tracks canine assets. However, TSA did not evaluate the entire EDCT program for alignment with its risk-based security strategy as required by the Act; nor did it develop a unified deployment strategy for its EDCTs surface transportation.

TSA provides significant resources and support to local law enforcement agency (LEA) canine teams in the surface transportation system by providing a canine for each handler, initial team training, and an annual stipend. However, LEA participation in the EDCT program is voluntary. As a result, TSA does not require that its LEA partners participate in conducting a risk-based evaluation of the EDCT program.

Explosives pose a serious risk to the surface transportation system. Although TSA has developed a deployment strategy based on risk for EDCTs to airports, there is no such strategy for surface transportation. Consequently, TSA cannot be sure that EDCTs are properly allocated based on risk to protect the traveling public from a terrorist attack.

### **TSA Response**

TSA concurred with both recommendations, which we consider open and resolved.



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**Background**

In 1972, the Federal Aviation Administration (FAA) initiated the use of explosives detection canine teams in partnership with state and local law enforcement agencies with jurisdiction over airports to protect against terrorist attacks. In March 2003, the FAA transferred its canine program to the Transportation Security Administration (TSA). TSA’s National Explosives Detection Canine Team Program (NEDCTP) is a congressionally mandated program that exists to detect and deter the introduction of explosive devices into the Nation’s transportation system, including highways, passenger rail systems, buses, ferries, pipelines, and airports. Appendix B shows the surface transportation landscape in the United States.

NEDCTP consists of TSA-led teams and state and local law enforcement agency (LEA) partner teams. LEAs voluntarily participate in the program and sign an interagency cooperative agreement with TSA that lasts for 5 years. LEA partners provide officers to staff canine teams and maintain TSA-certified canines. TSA provides a canine for each handler, initial team training, and an annual stipend to partially reimburse each participating LEA for operational costs for maintaining the canine teams.

The NEDCTP has two types of Explosives Detection Canine Teams (EDCT) — Passenger Screening Canine and Explosives Detection Canine. Passenger



**Figure 1. TSA Explosives Detection Canine Team**

Source: DHS Best Practices for Detection Canine Training and Testing, July 2020

Screening Canines are trained to detect explosives concealed on a passenger’s moving body or in a passenger’s accessible property and are operated by TSA at airports. Explosives Detection Canines are trained to target stationary objects and are exclusively operated by state and local LEA in the aviation and surface transportation systems. As of April 2021, NEDCTP had 1,097 funded EDCTs across transportation systems with 675 of these being LEA-led teams. Of these 675 teams, 169 were focused on surface transportation security. We focused our review on these surface transportation teams in

accordance with the *FAA Reauthorization Act of 2018* (Act).<sup>1</sup>

<sup>1</sup> *FAA Reauthorization Act of 2018*, Pub. L. No. 115-254, 132 Stat. 3186 (Oct. 5, 2018).



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Section 1964 of the Act, *Surface transportation security assessment and implementation of risk-based strategy*, requires TSA to complete a surface transportation security assessment, a risk-based security strategy, and an evaluation of existing surface transportation security programs, including TSA's EDCT program. In addition, Section 1970 of the Act, *Review of the explosives detection canine team program*, states that the Department of Homeland Security Office of Inspector General (OIG) must review the EDCT program for surface transportation within 90 days of receiving TSA's *Surface Transportation Risk-Based Security Strategy*. Specifically, according to Section 1970, DHS OIG is to review TSA's:

- development of a deployment strategy for EDCT;
- national EDCT training program, including canine training, handler training, refresher training, and updates to such training;
- use of canine assets during an urgent security need, including the reallocation of such program resources outside the transportation systems sector during an urgent security need; and
- monitoring and tracking of canine assets.

### Results of Review

#### **TSA Has Made Efforts to Develop Its Explosives Detection Canine Team Program**

TSA has established operational processes for routine activities in its EDCT program for surface transportation. Specifically, TSA has a national training program, uses EDCTs to meet urgent security needs, and monitors and tracks canine assets.

#### **TSA Has Developed and Implemented Training for EDCTs in Surface Transportation**

TSA has developed a national EDCT training program that includes canine, handler, and refresher training. According to TSA officials, the Canine Training Center (CTC) develops canine and handler training curricula and incorporates training improvement recommendations from DHS' Science and Technology Directorate. Canine Training Instructors, trained by CTC, conduct quarterly assessments of EDCTs. Additionally, CTC instructors provide refresher, advancement, and deficiency resolution training to all EDCTs on a case-by-case basis.

NEDCTP staff visit canine teams annually at their assigned locations to perform program compliance assessments, observe EDCT activity and



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training, and initiate corrective actions for any observed performance deficiencies. Additionally, NEDCTP conducts unannounced assessments of EDCTs in the field to determine effectiveness, identify deficiencies, and improve performance through remediation.

#### **TSA Ensures EDCTs Are Used to Meet Urgent Security Needs**

TSA has ensured that LEAs use EDCT assets to meet urgent security needs, including reallocating program resources outside the transportation systems sector during special events that may have such needs. TSA uses canine teams to support special events including the Super Bowl and the Presidential Inauguration. Teams are primarily focused on the surface transportation aspects of the event, including vehicles, passenger rail systems, and buses.

NEDCTP officials provided detailed guidance outlining processes and procedures to facilitate the efficient deployment of EDCTs to special events. TSA is currently formalizing this guidance, which includes procedures for the deployment of EDCTs in emergent situations. The new guidance is intended to adequately ensure standardized, repeatable processes for TSA and LEA participant resources.

#### **TSA Monitors and Tracks Its Canine Assets**

TSA developed guidance and tools to monitor and track its canine assets. TSA operates a Canine Website (CWS) that tracks pertinent data for canine teams. During our initial review of the CWS data, we determined that NEDCTP maintains information about the locations of assigned canine teams, training, and time utilization. In coordination with NEDCTP and CTC, we conducted a virtual walk-through of the CWS. We reviewed summary reports showing location assignments and training statuses for all EDCTs, as well as source documents showing individual EDCT assignments, results of individual EDCT training assessments, and supervisory signoffs for these records.

#### **TSA Did Not Evaluate the Explosives Detection Canine Team Program**

TSA did not evaluate its EDCT program to ensure it aligned with its surface transportation risk-based security strategy, as required by Section 1964 (b)(2)(A) of the Act. There is no mention of the EDCT program in either TSA's *Surface Transportation Security Assessment* or TSA's *Surface Transportation Risk-Based Security Strategy*. In addition, TSA was unable to provide us with any evidence it evaluated the EDCT program.



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We asked both TSA's NEDCTP and Strategy, Policy, and Innovation Division (SP&I) whether they evaluated the EDCT program prior to or while drafting TSA's *Surface Transportation Risk-Based Security Strategy*. SP&I leadership replied that it usually relies on program offices to inform it of development and implementation of strategies, and leaders were confident the EDCT program was among the many programs reviewed during the development of the security strategy. According to NEDCTP officials, their office was not involved in creating the *Surface Transportation Risk-Based Security Strategy* and they did not believe a specific, focused, formal evaluation of the canine program was completed. In addition, NEDCTP officials stated that they do not have a cumulative evaluation to assess the comprehensive performance of the EDCT program, although performance measures are routinely monitored and reported.

### **TSA Does Not Have a Strategy to Deploy Its Explosives Detection Canine Teams to the Surface Transportation System**

TSA has not developed a deployment strategy for the EDCT program within the surface transportation system. Neither TSA's *Surface Transportation Security Assessment* nor its *Surface Transportation Risk-Based Security Strategy* included information related to a deployment strategy for the EDCT program. Additionally, TSA did not provide any planning or program documentation to support the existence of a deployment strategy for EDCTs to surface transportation. TSA leadership also acknowledged it does not have such a strategy.

TSA did not develop a deployment strategy for EDCTs to the surface transportation system because it relies on its LEA partners to deploy their EDCTs according to the LEAs' deployment strategies. However, TSA does not collect or review its LEA partner deployment strategies.

### **Conclusion**

TSA provides significant resources and support to LEA canine teams within the surface transportation system by providing a canine for each handler, initial team training, and an annual stipend. However, LEA participation in the EDCT program is voluntary. As a result, TSA does not require that its LEA partners participate in conducting a risk-based evaluation for the EDCT program. Explosives pose a serious risk to the surface transportation system. Although TSA has developed a deployment strategy based on risk for EDCTs to airports, there is no such strategy for surface transportation. Consequently, TSA cannot be sure that EDCTs are properly allocated, based on risk, to protect the traveling public from a terrorist attack.



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**Recommendations**

We recommend the Executive Assistant Administrator of Security Operations:

**Recommendation 1:** Coordinate with local law enforcement agency partners to evaluate the Explosives Detection Canine Team program for consistency with TSA's *Surface Transportation Risk-Based Security Strategy* to comply with the *FAA Reauthorization Act of 2018*.

**Recommendation 2:** Coordinate with local law enforcement agency partners to develop an agency-wide strategy for deployment of Explosives Detection Canine Teams in the surface transportation system that aligns with TSA's *Surface Transportation Risk-Based Security Strategy* and complies with the *FAA Reauthorization Act of 2018*.

**Management Comments and OIG Analysis**

We received TSA's formal response to our draft report on July 21, 2021. Officials stated TSA remains committed to the effective and efficient deployment of EDCTs, expanding explosive detection capability through strategic deployment of resources, and enhancing partnerships with local and state law enforcement agencies.

TSA concurred with all recommendations.

Based on our evaluation of TSA's response, we consider recommendations 1 and 2 open and resolved. Appendix A contains a copy of TSA's response in its entirety. We also received technical comments and incorporated changes to the report where appropriate. TSA's responses to the recommendations and our analysis follows.

**TSA Response to Recommendation 1:** Concur. TSA noted that even before the conclusion of the OIG's fieldwork for this draft report, it had finalized several related initiatives and program enhancements. The TSA Administrator's Intent 2.0, for example, specifically prioritizes continuous improvements to resource allocation and coordination strategies. These improvements are ongoing and include improvements allocating and deploying surface resources.

To further exemplify TSA's commitment to stakeholder-driven evaluations of the EDCT program, the NEDCTP is developing a forum to increase collaboration, which is a specific focus of the Administrator's Intent 2.0. Historically, the NEDCTP conducted collaborative reviews with key





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stakeholders, and while this activity has fallen off in recent years, its value and necessity have become apparent. The reviews allow law enforcement and TSA partners to identify deployment strategies coordinated among various agencies and authorities. The NEDCTP expects to begin conducting these evaluations again during 2022. Ultimately, the reinvigoration of these practices will better inform future TSA strategy and guidance. Furthermore, these cyclical program reviews will provide field- and stakeholder-driven insight into areas of the program in need of further evaluation.

TSA's Requirements, Capabilities, and Analysis (RCA) office is also expecting results from an ongoing capability analysis of canine teams as Mobile Explosives Threat Mitigation resources in FY 2022. This initiative began in May 2021, in parallel to the Administrator's Intent 2.0, and will study canines in a comparative environment in the context of security gaps and vulnerabilities. The analytical results will inform the next revision of TSA policy and guidance, including: (1) the next Administrator's Intent; (2) TSA's *Surface Transportation Risk-Based Security Strategy*; and (3) future business decisions regarding deployment recommendations, allocations, and funding requests. Most importantly, this study and analysis will be integral to a full review of the TSA NEDCTP and will allow the NEDCTP to design policies that further drive evaluation of its performance with regard to TSA's *Surface Transportation Risk-Based Security Strategy* and compliance with the *FAA Reauthorization Act of 2018*. Estimated Completion Date (ECD): June 30, 2022.

**OIG Analysis of TSA Response:** TSA's proposed actions are responsive to the recommendation. The recommendation will remain open and resolved until TSA provides documentation showing a full evaluation of the NEDCTP with regard to TSA's *Surface Transportation Risk-Based Security Strategy* and compliance with the *FAA Reauthorization Act of 2018*, as well as improvements to resource allocation and coordination strategies.

**TSA Response to Recommendation 2:** Concur. Through extensive program evaluation and stakeholder-informed reviews, the NEDCTP will: (1) catalogue deployment strategies for its surface participants; and (2) develop a unified surface deployment strategy addressing the critical and core goals of EDCT deployments and coordination of resources to mitigate identified gaps and vulnerabilities. This effort will be led by the NEDCTP and TSA's RCA, and will be assessed against the Administrator's Intent 2.0, TSA's *Surface Transportation Risk-Based Security Strategy*, and an ever-changing threat landscape. It will also be informed by ongoing study and evaluation performed by TSA's RCA, the Canine Capability Manager, and the NEDCTP. These efforts will quantify and catalogue strategies and assess each strategy against unified expectations. This effort will form the basis of performance measurements and



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provide system feedback to further inform the unified strategy. Many ongoing initiatives reflect progress in this area, shaping the current landscape to meet the requirements of the law. For example:

- The NEDCTP and Federal Air Marshal Service are assessing and promoting EDCT participation in insider threat operations and Visible Intermodal Prevention and Response team operations.
- Security Operations is providing additional guidance to Federal Security Directors to use their NEDCTP resources to mitigate risk in local mass transportation venues. Once released, the *Dynamic Canine Strategy Countermeasures Guide* will identify many activities performed at, and within, surface venues during vulnerable times.
- The NEDCTP began reporting and tracking measurements related to the distribution of EDCT activity by mode and area in October 2020. These measurements are informational and provide key insights into the bulk activity performed by NEDCTP resources over time.
- The NEDCTP is implementing a new agreement template, *TSA-LEO Canine Coordination and Response Resolution Agreement*, between the NEDCTP and non-Federal stakeholder authorities that increases strategic planning and collaboration. This template agreement will be implemented with each relevant LEO and/or airport authority over the next 2 years to replace the existing Canine Screening of Individuals (CSOI) and Concept of Operations (CONOP) agreements. Currently, 3 of 49 of these new agreements are signed. Most importantly, these agreements are distinct from the CSOI and CONOP agreements in that they drive collaboration and coordination between multiple agencies with regard to intelligent deployment of EDCTs. These new agreements are intended for yearly review and will serve as a tool for unified strategic cooperation. ECD: June 30, 2022.

**OIG Analysis of TSA Response:** TSA's proposed actions are responsive to the recommendation. The recommendation will remain open and resolved until TSA implements and provides copies of a formal unified surface deployment strategy, as well as policies, procedures, and agreements used in carrying out the strategy.



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### Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. We conducted this mandated review between October 2020 and May 2021 pursuant to the *Inspector General Act of 1978, as amended*, and according to *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.

Our objective was to determine the extent to which TSA has evaluated its EDCT program and has met the *FAA Reauthorization Act of 2018* requirements for training, using program resources, and monitoring and tracking canine assets as part of developing and implementing its *Surface Transportation Risk-Based Security Strategy*.

To achieve our objective, we reviewed Federal laws, policies, and procedures to identify applicable criteria related to TSA's *Surface Transportation Security Assessment* and implementation of the *Surface Transportation Risk-Based Security Strategy*, and TSA's internal EDCT program guidance. We reviewed and analyzed prior reports related to our objective, including DHS OIG reports, Government Accountability Office reports, congressional testimony, and media reports. In addition, we reviewed and analyzed applicable Federal requirements regarding management's responsibility for internal controls within the EDCT program.

We conducted interviews, provided questionnaires, and obtained and reviewed documentation from TSA divisions including Requirements and Capabilities Analysis; TSA HQ Training and Development; TSA CTC; NEDCTP; Industry Engagement Branch in Policy, Plans, and Engagement; Special Operations Division; SP&I; and DHS' Science and Technology Directorate.

To address the requirements of the *FAA Reauthorization Act of 2018* Sections 1964 and 1970, we focused our review on surface transportation that included a review of TSA's:

- evaluation of its EDCT program;
- development of a deployment strategy for EDCTs;
- national EDCT training program;
- use of canine assets to meet urgent security needs; and monitoring and tracking of canine assets.

To assess the reliability of TSA's CWS information related to our objective, we interviewed NEDCTP and TSA HQ Training and Development officials to gain



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an understanding of how TSA used the system for monitoring and tracking canine assets. Additionally, we obtained and reviewed information that was extracted from the system to validate during a virtual walk-through. We reviewed the location of canine teams, training, and time utilization maintained by NEDCTP.

Due to the COVID-19 pandemic, we conducted all project steps via telephone, email, or video communication. Although the team did not physically travel for meetings or site visits, we believe that these restrictions did not impair our ability to gather sufficient evidence to support our conclusions.

The Office of Audits major contributors to this report are Shelley Howes, Director; Modupe Ogunduyile, Audit Manager; Kate Fishler, Auditor-in-Charge; Diane Benton, Program Analyst; Denis Foley, Program Analyst; Richard Puglisi, Program Analyst; Thomas Hamlin, Communications Analyst; Marcie McIsaac, Independent Referencer.



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**Appendix A**  
**TSA Comments to the Draft Report**



U.S. Department of Homeland Security  
Transportation Security Administration  
6595 Springfield Center Drive  
Springfield, Virginia 20598

July 21, 2021

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.  
Inspector General

FROM: David Pekoske *David P. Pekoske*  
Administrator  
Transportation Security Administration

SUBJECT: Management Response to Draft Report: "TSA Did Not Assess Its Explosives Detection Canine Team Program for Surface Transportation Security" (Project No. 20-062-AUD-TSA)

Thank you for the opportunity to comment on this draft report. The Transportation Security Administration (TSA) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review, and issuing this report.

TSA is pleased to note OIG's recognition that TSA's Explosives Detection Canine Team (EDCT) program has a national training program for canines and handlers, uses canine assets to meet urgent security needs, and monitors and tracks canine assets. TSA remains committed to: (1) the effective and efficient deployment of EDCTs; (2) expanding explosive detection capability through strategic deployment of resources; and (3) enhancing partnerships with local and state law enforcement agencies.

As part of this commitment, TSA's National Explosives Detection Canine Team Program (NEDCTP) is reviving the involvement of both TSA and law enforcement in the leadership of canine resources during Visible Intermodal Prevention and Response (VIPR) activities, as well as combining security resources to deter and detect multi-modal threats. Furthermore, TSA began coordination between canine and surface subject matter experts to increase the level of collaboration and planning between these experts in February of 2021. Current collaboration is focused on the assessment of Advanced Resource Allocation and Modeling in the Seattle Metro area, and how this tool can be implemented nationally. The NEDCTP currently provides oversight and support through its Headquarters Canine Coordinators to both aviation and surface units. However, the NEDCTP intends to dedicate some of its management and oversight resources specifically to surface operations, to provide more specialized feedback, guidance, and support in order to achieve the goals of TSA's Administrator and the requirements of the law.



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In addition, TSA prioritized the agency's coordination of explosives detection resources with partners and stakeholders by mentioning the canine program in the TSA Administrator's Intent 2.0, dated June 23, 2020. Specifically, Strategic Goal 1.1.1 states, "TSA has a mature, collaborative canine program that manages capabilities across the enterprise and leverages the unique strengths of canine teams across all transportation modes." To help advance this goal, the NEDCTP implemented a new agreement template, the "TSA-LEO Canine Coordination and Response Resolution Agreement" in May 2021, which requires coordination between its canine units and surrounding jurisdictional authorities (state and local), including those that are responsible for mass transit infrastructure and systems.

The NEDCTP also began to use its risk-evaluation scores in combination with balanced geographic deployments in January 2021 to prioritize the deployment of dedicated surface law enforcement-led EDCTs. For example, the NEDCTP used this method as a part of the Risk Based Canine Allocation Methodology to assess and negotiate the movement of resources from Delaware River Bay Authority to a new location. Using the risk information, AMTRAK, Delaware University Police Department, Jackson, Mississippi, and others were solicited for program participation.

The draft report contained two recommendations with which TSA concurs. Attached find our detailed response to each recommendation. TSA previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for OIG's consideration.

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

Attachment



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**Attachment: Management Response to Recommendations  
Contained in OIG Project No. 20-062**

OIG recommended that the Executive Assistant Administrator for Security Operations:

**Recommendation 1:** Coordinate with local law enforcement agency partners to evaluate the Explosives Detection Canine Team program for consistency with TSA's Surface Transportation Risk-Based Security Strategy to comply with the FAA Reauthorization Act of 2018.

**Response:** Concur. It is important to note, however, that even before the conclusion of the OIG's fieldwork for this draft report, TSA finalized several related initiatives and program enhancements. TSA's Administrator's Intent 2.0, for example, specifically prioritizes continuous improvements to resource allocation and coordination strategies. These improvements are ongoing, and included improvements to how surface resources are allocated and deployed.

As a further example of TSA's commitment to stakeholder-driven evaluations of the EDCT program, the NEDCTP is developing a forum to increase collaboration, which is a specific focus of the Administrator's Intent 2.0. Historically, the NEDCTP conducted collaborative reviews with key stakeholders, and while this activity has fallen off in recent years, its value and necessity has become apparent, as the reviews allow law enforcement and TSA partners to identify deployment strategies coordinated between various agencies and authorities. The NEDCTP expects to begin conducting these evaluations again during 2022. Ultimately, the reinvigoration of these practices will better inform future TSA strategy and guidance. Furthermore, these cyclical program reviews will provide field-and-stakeholder-driven insight into areas of the program in need of further evaluation.

TSA's Requirements, Capabilities, and Analysis (RCA) office is also expecting results from an on-going capability analysis of canine teams as Mobile Explosives Threat Mitigation resources in fiscal year 2022. This initiative began in May 2021, in parallel to the Administrator's Intent 2.0, and will study canines in a comparative environment in the context of security gaps and vulnerabilities. The analytical results will inform the next revision of TSA policy and guidance, including: (1) the next Administrator's Intent; (2) TSA's Surface Transportation Risk-Based Security Strategy, and future business decisions regarding deployment recommendations, allocations, and funding requests. Most importantly, this study and analysis will be integral to a full review of the TSA NEDCTP, and will allow the NEDCTP to design policies that further drive evaluation of the NEDCTP's performance with regard to TSA's Surface Transportation Risk-Based



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Security Strategy and compliance with the Federal Aviation Administration Reauthorization Act of 2018.

Estimated Completion Date (ECD): June 30, 2022.

**Recommendation 2:** Coordinate with local law enforcement agency partners to develop an agency-wide strategy for deployment of Explosives Detection Canine Teams in the surface transportation system that aligns with TSA's Surface Transportation Risk-Based Security Strategy and complies with the FAA Reauthorization Act of 2018.

**Response:** Concur. Through extensive program evaluation and stakeholder-informed reviews, the NEDCTP will: (1) catalogue deployment strategies for its surface participants; and (2) develop a unified surface deployment strategy addressing the critical and core goals of EDCT deployments and coordination of resources to mitigate identified gaps and vulnerabilities. This effort will be led by the NEDCTP and TSA's RCA, and will be assessed against the Administrator's Intent 2.0, TSA's Surface Transportation Risk-Based Security Strategy, and an ever-changing threat landscape. It will also be informed by ongoing study and evaluation performed by TSA's RCA, the Canine Capability Manager, and the NEDCTP. These efforts will quantify and catalogue strategies and assess each strategy against unified expectations. This effort will form the basis of performance measurements and provide system feedback to further inform the unified strategy. Many ongoing initiatives reflect progress in this area, shaping the current landscape to meet the requirements of the law. For example:

- The NEDCTP and Federal Air Marshal's Service are assessing and promoting EDCT participation in insider threat operations and VIPR operations.
- Security Operations is providing additional guidance to Federal Security Directors to make use of their NEDCTP resources to mitigate risk in local mass transportation venues. Once released, the "Dynamic Canine Strategy Countermeasures Guide" will identify many activities performed at, and within, surface venues during vulnerable times.
- The NEDCTP began reporting and tracking measurements related to the distribution of EDCT activity by mode and area in October 2020. These measurements are informational and provide key insights into the bulk activity that is performed by NEDCTP resources over time.
- The NEDCTP is implementing a new agreement template, the "TSA-LEO Canine Coordination and Response Resolution Agreement," between the NEDCTP and non-federal stakeholder authorities that increases strategic planning and collaboration. This template agreement will be implemented with each relevant LEO and/or airport authority over the next 2 years to replace the existing Canine





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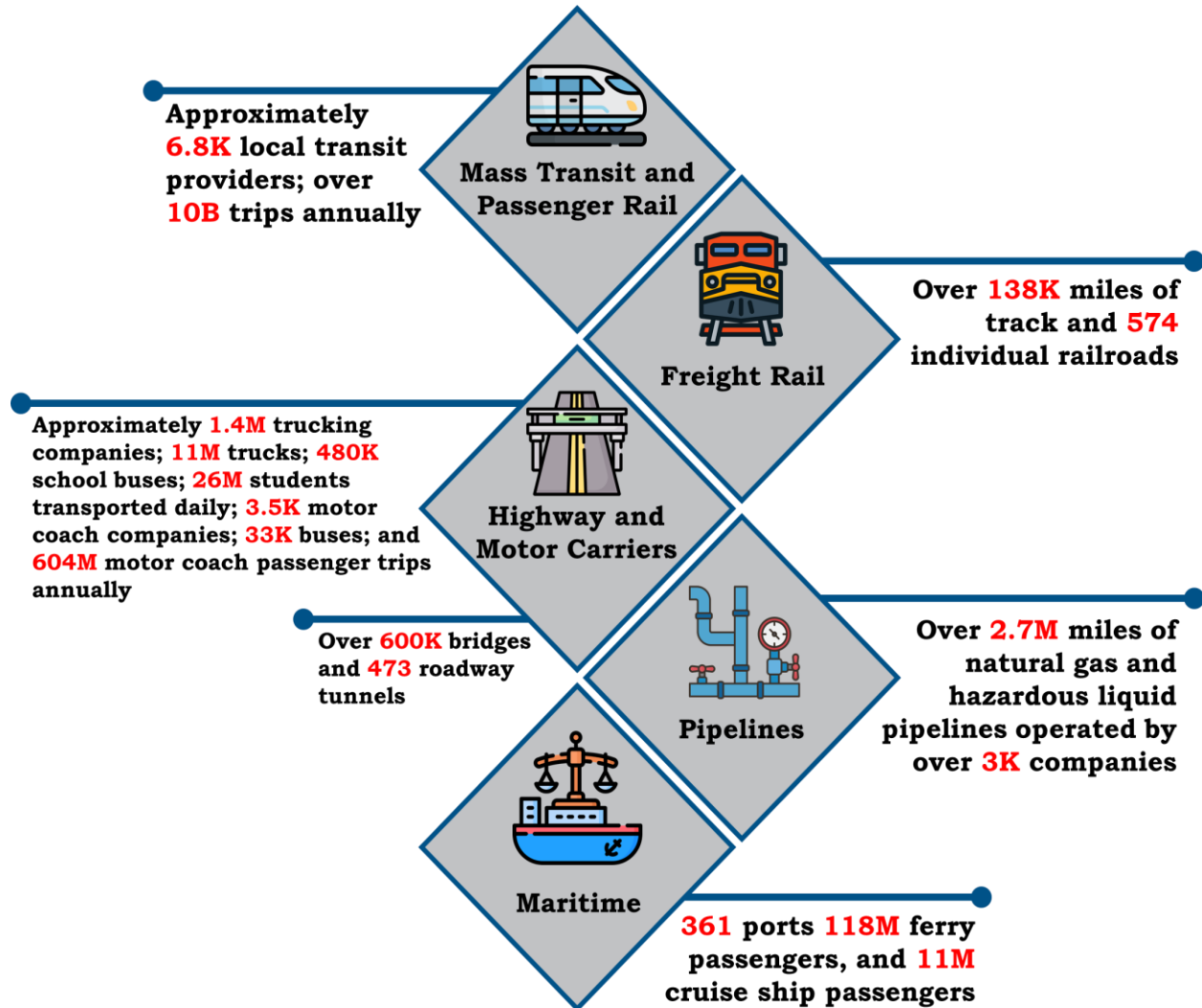
Screening of Individuals (CSOI) and Concept of Operations (CONOP) agreements. Currently, 3 of 49 of these new agreements are signed. Most importantly, these agreements are distinct from the CSOI and CONOP agreements in that they drive collaboration and coordination between multiple agencies with regard to intelligent deployment of EDCTs. These new agreements are intended for yearly review and will serve as a tool for unified strategic cooperation.

ECD: June 30, 2022.



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**Appendix B**  
**United States Surface Transportation Landscape**



Source: TSA Surface Transportation Security Presentation, February 2020



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**Appendix C**  
**Report Distribution**

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