

St. Charles Council on Aging, Inc. System Security Plan (SSP)

Approved



(Sign)

4/18/2024

(Date)

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Executive Director

(Title)

Transit Provider

SYSTEM SECURITY PLAN (SSP)

STATEMENT OF SECURITY POLICY

This System Security Plan (SSP) formally defines the St. Charles Council on Aging, Inc. Security Program. This System Security Plan (SSP or Plan) identifies the St. Charles Council on Aging, Inc. security policy and the responsibilities associated with security for all employees, and for all organizations or persons providing support to the St. Charles Council on Aging, Inc. The Security Program applies to all phases of the St. Charles Council on Aging, Inc. operation and maintenance as provided in the Louisiana Department of Transportation and Development (LADOTD) "Transit Bus Safety Standard ("Standard"). This Standard provides the operational security policies and programs for the St. Charles Council on Aging, Inc., including the specific policy, management, responsibilities, and assessments identified in the SSP. Enhanced Security Elements shall be addressed for implementation when the St. Charles Council on Aging, Inc. passengers, vehicles and routes grow and/or the number or severity of incidents increase. The St. Charles Council on Aging, Inc. shall determine the need and availability of resources to implement any of the Enhanced Elements.

The St. Charles Council on Aging, Inc. has the authority to implement the Plan as described in the Standard. The coordinated efforts of the Office of Emergency Preparedness (OEP) and St. Charles Council on Aging, Inc. provide the foundation for operational response to any disaster as identified in the St. Charles Council on Aging, Inc. "Comprehensive Emergency Management Plan".

Only authorized parties or individuals shall have access to the System Security Plan.

Revisions

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Distribution to Plan Holders

The St. Charles Council on Aging, Inc. and its employees shall not publicly disclose this System Security Plan or related documents under any circumstances. Only authorized parties or individuals shall have access to the System Security Plan.

| DATE | NAME | TITLE/ORGANIZATION |
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1.0 Introduction

The St. Charles Council on Aging, Inc. has established a set of comprehensive security activities that are documented in this System Security Plan (SSP). The Security Plan applies to all phases of the St. Charles Council on Aging, Inc. operation and maintenance as provided in the Louisiana Department of Transportation and Development (LADOTD) "Transit Bus Safety Standard ("Standard"). This Standard provides the operational security policies and programs for the St. Charles Council on Aging, Inc., including the specific policy, management, responsibilities, and assessments identified in the SSP.

The St. Charles Council on Aging, Inc. shall not publicly disclose this System Security Plan. This SSP is reviewed annually to evaluate security performance and to determine the need for revising the SSP.

1.1 Purpose of System Security

System Security is established to reduce threats and vulnerabilities to the most practical level through the most effective use of available resources. The System Security Plan addresses deliberate actions taken by perpetrators to harm employees, passengers, to acquire money, goods, equipment, or to deliberately damage or destroy equipment and facilities.

1.2 Goal and Objectives

The Plan Goal is to improve the security of the St. Charles Council on Aging, Inc., encompassing patrons, staff, and property. This goal is achieved through a variety of objectives and tasks associated with reaching and maintaining those objectives.

The Program Objectives are:

- Reduce vulnerability on the system by making the most efficient use of the present staff
- Increase the public's knowledge of our security efforts
- To identify and minimize potential security risks
- Create a record-keeping system that would log incidents by date, location, type, and disposition.
- Implement a program for authorizing access to sensitive information.
- Maintain communications with LADOTD regarding security-related events.

1.3 Security and Law Enforcement

The St. Charles Council on Aging, Inc. maintains an active, positive attitude of teamwork with the police and emergency response personnel who operate within the St. Charles Council on Aging, Inc. geographical area.

2.0 Transit System Description

| | |
|---------------------------------------|---------------------------|
| Fixed Routes | <u>0</u> |
| Vehicles, total | <u>5</u> |
| Vehicles, operate in the fixed routes | <u>0</u> |
| Vehicles, operate in demand/response | <u>5</u> |
| Service, days per week (average) | <u>5</u> |
| Service, hours per day (average) | <u>7:00 am to 3:30 pm</u> |

3.0 Transit Provider Organization

3.1 Security Responsibility

The St. Charles Council on Aging, Inc. is responsible for the implementation, maintenance, and compliance with all Federal, State, and Local regulations, ordinances, and laws. The St. Charles Council on Aging, Inc. ensures that all requirements of the SSP are met.

3.2 Security Responsibility with Other Departments and Organizations

The Office of Emergency Preparedness (OEP) coordinates the Transit Operator response to natural and man-made disasters including liaison with the local Police Department, other law enforcement agencies, Fire Department and Emergency Response Agencies. The Transit Operator response to incidents and/or accidents involving fires, terrorism, chemical/biological/nuclear and bomb threats, and other types of emergency situations is directed by the OEP and/or the procedures of the authority having jurisdiction.

4.0 Management and Modification of Security Program Plan (SSP)

The St. Charles Council on Aging, Inc. is mindful of the need for the public's trust and confidence; to value patrons and employees and treat them with dignity and respect; and solicit and respond to ideas from patrons and employees through free flowing, constructive communications.

The St. Charles Council on Aging, Inc. will conduct periodic reviews and revisions, if appropriate, of the Security Program Plan. Revisions are filed with the LADOTD.

5.0 System Security Role and Responsibility

The St. Charles Council on Aging, Inc. "Comprehensive Emergency Management Plan" addresses the St. Charles Council on Aging, Inc. response to emergencies. The following activities shall be implemented as required and with cooperation of the local Office of Emergency Preparedness, other Emergency Response entities, and consistent with the Parish Emergency Response Plan.

5.1 Procedure for Response to Threats/Incidents

Calls are received by St. Charles Council on Aging, Inc. Dispatch. All calls are entered into a log and/or the "Notification/Investigation Report" Form (Appendix A) with the following minimum information: time and date, the identity of the caller, the type of incident and identification of the corrective action or response and primary responder. The "Notification/Investigation Report" Form (Appendix A) is used for those incidents requiring notification to LADOTD.

5.2 Security Orientation and Training

Ongoing training on security and emergency procedures using a variety of aids, including pamphlets (e.g.: National Transit Institute), signs, posters, video, and memorandums; and public awareness materials are distributed.

5.3 Tabletop and Emergency Drills

Emergency Preparedness drills are coordinated with the local Office of Emergency Preparedness and regional Emergency Response Agencies and are performed as required by those entities.

5.4 Access Control

Access Control provides protection for safety and security sensitive documents and facilities. Access is provided to personnel based upon need and responsibilities.

5.5 Criteria for Background Investigations

The St. Charles Council on Aging, Inc. defines procedures for addressing background checks.

5.6 Contractor Background Investigation

Contractors who require access to safety and security critical information or facilities must provide information requested by the St. Charles Council on Aging, Inc.

5.7 Substance Abuse Program

The St. Charles Council on Aging, Inc. has adopted a substance misuse policy statement. The statement is available to each covered employee.

5.8 Protocols - Office of Homeland Security Threat Advisory Levels

Threat Advisory Levels provide a series of cumulative safety and security response procedures commensurate with five (5) color-coded levels of responses to threatened terrorist activity.

6.0 Threat and Vulnerability Identification, Assessment, and Resolution Process

The “Vulnerability Assessment”, Appendix B, is used to make assessments concerning how susceptible each system element of St. Charles Council on Aging, Inc. is, and what improvements, if necessary, can be implemented to reduce vulnerability. This process is used by the St. Charles Council on Aging, Inc. as determined by circumstances, threat level, or as requested by the local Office of Emergency Preparedness or LADOTD.

7.0 Internal Reviews

The internal security review or inspection process shall be conducted periodically to maintain security program performance. Specific areas for review and review checklists shall be determined by the St. Charles Council on Aging, Inc., based on experience, and may address:

- Facilities/Equipment
- Rules/Procedures
- Training
- Accident/Incident Reporting

8.0 Reports and Certification

Refer to form in Appendix C. Reports for Safety and Security may be combined or submitted separately. If separate submissions are planned, appropriate modifications to the Form are required.

LADOTD Risk/Threat Vulnerability Assessment

Risk Management Example

The following example may help in understanding the risk management process. Risk assessment may focus on a number of potential hazards, but this example will demonstrate the process for *three hazards only; vandalism, robbery, and fire*.

Hazard Identification. Transit management determines what hazards are most likely to occur and generates a list of potential hazards. The transit agency then assesses their facilities and systems based on this list of potential hazards.

For example, a review of past security incidents and input from local police indicates that acts of vandalism and robbery are possible. Fires are potential hazards that can start anywhere so they should be added to the list.

Hazard Analysis. While subjecting each facility and system to its vulnerability of vandalism, it is determined that the transit agency’s control center might have a very low vulnerability to vandalism and be assigned a rating of E (improbable). In contrast, transit management may decide that robberies and vandalism are more likely in transit vehicles and facilities and assign higher ratings. The following is an example of how this transit agency may rank its vulnerability on these few selected hazards:

Table 1: Vulnerability Analysis

| Facilities/Systems and Hazards | Vandalism | Robbery | Fire |
|--------------------------------|-----------|---------|------|
| Facilities | | | |
| • Dispatch Center | E | D | D |
| • Reception Room | C | C | D |
| Systems | | | |
| • Electrical System | E | E | D |
| • Transit vehicles | B | C | C |

Risk Assessment. Using the examples from this vulnerability analysis table, transit management assigns different severity ratings to these hazards. A higher severity rating may be given to a fire in the dispatch room because the movement of transit vehicles is greatly affected when dispatch equipment is damaged. This loss of equipment may also have consequences in passenger and driver safety, continuity in transportation service, loss in revenue, and security concerns. The following is an example of a risk assessment table created for these previously selected hazards:

Table 2: Risk Assessment

| Facilities/Systems and Hazards | Vandalism | Robbery | Fire |
|--------------------------------|-----------|---------|------|
| Facilities | | | |
| • Dispatch center | IE | ID | ID |
| • Reception room | IIC | IIC | IID |
| Systems | | | |
| • Power distribution | IE | IE | ID |
| • Transit vehicles | IVE | IC | IC |

Hazard Resolution. Using the risk assessment table, transit management individually decides to control, transfer, remove, or accept each potential hazard. Since a fire in the dispatch room has the highest severity rating, transit management must take action on this hazard to reduce their exposure to financial and personnel loss. Examples of several options for managing and reducing the risk of a fire in the dispatch room may include but are not limited to:

- install a fire suppression system in the dispatch room (risk control)
- request a courtesy fire inspection of the transit facility from the local fire department (risk control)
- use two-way radios to dispatch transit vehicles (risk removal)
- forward calls from the central telephone number to cellular phones (risk control)
- use a manual system, such as log sheets, with trip information for each transit vehicle (risk removal)
- provide a fire alarm system throughout the transit facility (risk control)
- instruct office personnel on proper evacuation of transit facilities (risk control)
- purchase special insurance for dispatch equipment (risk transfer)
- evaluate insurance policies for current replacement values (risk acceptance)

Table 3: Probability

| Description | Level | Specific Component or System | Fleet or Inventory |
|-------------------|-------|--|---|
| Frequent | A | Likely to occur frequently. | Continuously experienced |
| Probable | B | Will occur several times in the life of an item. | Will occur frequently |
| Occasional | C | Likely to occur sometime in the life of an item. | Will occur several times |
| Remote | D | Unlikely but possible to occur in the life of an item. | Unlikely but can reasonably be expected to occur |
| Improbable | E | So unlikely, it can be assumed occurrence may not be experienced. | Unlikely to occur, but possible |

Table 4: Severity

| Category | Severity | Characteristics |
|----------|--------------|--|
| I | Catastrophic | Death, severe environmental damage, or damage to areas with major financial impact or extended interruption of critical services |
| II | Critical | Severe injury, severe occupational illness, environmental damage, or damage to areas containing physical value, confidential information, or computer access to sensitive data/operational processing networks |
| III | Marginal | Minor injury, minor occupational illness, environmental damage, or damage to areas where disruption is moderately serious for the transit agency |
| IV | Negligible | Less than minor injury, occupational illness, environmental damage, or areas relatively unimportant to the transit agency operations |

Table 5: Vulnerability Assessment

| Probability/ Severity | I(Catastrophic) | II (Critical) | III (Marginal) | IV (Negligible) |
|--------------------------|-----------------|------------------|-------------------|--------------------|
| A (Frequent) | IA | IIA | IIIA | IVA |
| B (Probable) | IB | IIB | IIIB | IVB |
| C (Occasional) | IC | IIC | IIIC | IVC |
| D (Remote) | ID | IID | IIID | IVD |
| E (Improbable) | IE | IIE | IIIE | IVE |

Hazard risk index

Acceptance criteria

| | |
|-------------------------------|--|
| IA, IB, IC, IIA, IIB, IIIA | Unacceptable, management must take action |
| ID, IIC, IID, IIIB, IIIC | Undesirable, management decision is required |
| IE, IIE, IIID, IIIE, IVA, IVB | Acceptable with management review, requires monitoring |
| IVC, IVD, IVE | Acceptable without management review |

Blank Template for Your Use as Needed:

| Facilities Systems and Hazards | Active Shooter | Earthquake | Fire | Flood | Freeze Winter Storm | Industrial | Shelter In Place | Medical | Pandemic | Robbery | Severe Thunderstorm/Tornado | Train Derailment | Tropical Storm/Hurricane | Vandalism | War |
|--------------------------------|----------------|------------|------|-------|---------------------|------------|------------------|---------|----------|---------|-----------------------------|------------------|--------------------------|-----------|-----|
| Facilities | | | | | | | | | | | | | | | |
| • Dispatch Center | IE | IE | IE | IIC | IIC | IE | IIID | IIIC | IB | IIIE | IA | IE | IA | IIIE | IE |
| • Reception Center | IE | IE | IE | IIC | IIC | IE | IIID | IIIC | IB | IIIE | IA | IE | IA | IIIE | IE |
| Systems | | | | | | | | | | | | | | | |
| • Electrical System | | IE | IE | IIC | IIC | IE | IIID | | IB | IIIE | IA | IE | IA | IIIE | IE |
| • Transit Vehicles | IE | IE | IE | IIC | IIC | IE | IIID | IIIC | IB | IIIE | IA | IE | IA | IIIE | IE |

Appendix B

LADOTD Risk/Threat Vulnerability Assessment

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Table 6: Vulnerability Analysis

| Facilities/Systems and Hazards | Vandalism | Robbery | Fire |
|--------------------------------|-----------|---------|------|
| Facilities | | | |
| • Dispatch Center | E | D | D |
| • Reception Room | C | C | D |
| Systems | | | |
| • Electrical System | E | E | D |
| • Transit vehicles | B | C | C |

Risk Assessment. Using the examples from this vulnerability analysis table, transit management assigns different severity ratings to these hazards. A higher severity rating may be given to a fire in the dispatch room because the movement of transit vehicles is greatly affected when dispatch equipment is damaged. This loss of equipment may also have consequences in passenger and driver safety, continuity in transportation service, loss in revenue, and security concerns. The following is an example of a risk assessment table created for these previously selected hazards:

Appendix C

**DOTD Public Transit
UPLOAD INFORMATION INTO STTARS
Incident TEMPLET
(Non-Vehicle Accident)**

Agency: _____

DATE REPORTED: _____ TIME REPORTED: _____

DRIVER: _____ PHONE: _____

VEHICLE NUMBER OR VIN: _____

REPORTED TO: _____

DESCRIPTION OF INCIDENT:

PERSON ASSIGNED TO OVERSEE INVESTIGATION:

Name: _____

Phone: _____

Email: _____

PLANNED or IMPLEMENTED CORRECTIVE ACTION(S): _____

Incidents: Anything that happens on the transit vehicle other than a vehicle accident.

Example: Unable to control conditions on transit vehicle, passenger falls, passenger wants to get on vehicle with unidentified objects, a passenger is denied transit service because of danger to others, passenger is unstable, and EMS has to be called, wheelchair lift has failed, damaged or broken equipment, etc.

If you need assistance: Contact your Region Program Manager