
SUBJECT: Rail Cybersecurity Mitigation Actions and Testing

EFFECTIVE DATE: October 24, 2022

EXPIRATION DATE: October 24, 2023

SUPERSEDES: Not Applicable

APPLICABILITY: Each freight railroad carrier identified in 49 CFR 1580.101 and other TSA-designated freight and passenger railroads

AUTHORITY: 49 U.S.C. 114(d), (f), (l) and (m)

LOCATION: All locations within the United States

I. PURPOSE AND GENERAL INFORMATION

The Transportation Security Administration (TSA) is issuing this Security Directive due to the ongoing cybersecurity threat to surface transportation systems and associated infrastructure to mitigate the significant harm to the national and economic security of the United States that could result from the "degradation, destruction, or malfunction of systems that control this infrastructure."¹

This Security Directive requires actions necessary to protect the national security, economy, and public health and safety of the United States and its citizens from the impact of malicious cyber-intrusions affecting the nation's railroads.² Even minor disruptions in critical rail systems may result in temporary product shortages that can cause significant harm to national security. Prolonged disruptions in the flow of commodities could lead to widespread supply

² This Security Directive is issued under the authority of 49 U.S.C. 114(l)(2)(A), which states: "Notwithstanding any other provision of law or executive order (including an executive order requiring a cost-benefit analysis), if the Administrator determines that a regulation or security directive must be issued immediately in order to protect transportation security, the Administrator shall issue the regulation or security directive without providing notice or an opportunity for comment and without prior approval of the Secretary."
chain disruptions, with ripple effects across the economy. Disruptions and delays may affect industries that depend on the commodities transported by the nation’s railroads.

The goal of this Security Directive is to reduce the risk that cybersecurity threats pose to critical railroad operations and facilities through implementation of layered cybersecurity measures that provide defense-in-depth. Recent and evolving intelligence emphasizes the growing sophistication of nefarious persons, organizations, and governments, highlights vulnerabilities, and intensifies the urgency of implementing the requirements of this Security Directive.³

In general, this Security Directive is applicable to the same railroads subject to Security Directive 1580-21-01 “Enhancing Rail Cybersecurity,” which first went into effect on December 31, 2021,⁴ and additional TSA-designated freight and passenger railroads notified by TSA based on a risk determination.

To protect against the ongoing threat to the United States’ national and economic security, this Security Directive mandates that these railroad Owner/Operators implement the following cybersecurity measures to prevent disruptions to their infrastructure and/or operations. Specifically, Owner/Operators must:

1. Establish and implement a TSA-approved Cybersecurity Implementation Plan that describes the specific measures employed and the schedule for achieving the following outcomes, as more fully described in Section III.A through III.E.:

   a. Implement network segmentation policies and controls to ensure that the Operational Technology system can continue to safely operate in the event that an Information Technology system has been compromised;

   b. Implement access control measures to secure and prevent unauthorized access to Critical Cyber Systems;

   c. Implement continuous monitoring and detection policies and procedures to detect cybersecurity threats and correct anomalies that affect Critical Cyber System operations; and

   d. Reduce the risk of exploitation of unpatched systems through the application of security patches and updates for operating systems, applications, drivers and firmware on Critical Cyber Systems in a timely manner using a risk-based

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⁴ Section II.A for applicability.
methodology.

2. Establish a Cybersecurity Assessment Program and submit an annual plan to TSA that describes how the Owner/Operator will proactively and regularly assess the effectiveness of cybersecurity measures, and identify and resolve device, network, and/or system vulnerabilities. See Section III.F.

The Security Directive requires Owner/Operators to submit a Cybersecurity Implementation Plan for TSA approval. This plan, once approved by TSA, will set the security measures and requirements against which TSA will inspect for compliance. See Section II.B. Owner/Operators are required to provide additional documentation and access to TSA as necessary to establish compliance. See Section IV. In developing their Cybersecurity Implementation Plan, Owner/Operators may use previous risk or vulnerability assessments to assist in identifying Critical Cyber Systems and the prioritization of cybersecurity measures associated with this Security Directive. See Section IV.A.

All information that must be reported or submitted to TSA pursuant to this Security Directive is Sensitive Security Information subject to the protections of part 1520 of title 49, Code of Federal Regulations. The Department of Homeland Security may use the information, with company-specific data redacted, for Department of Homeland Security’s intelligence-derived reports. TSA and the Cybersecurity and Infrastructure Security Agency also may use information submitted for vulnerability identification, trend analysis, or to generate anonymized indicators of compromise or other cybersecurity products to prevent other cybersecurity incidents. Information provided to Department of Homeland Security pursuant to this Security Directive may also be shared with other agencies as appropriate. The distribution, disclosure, and availability of information will be restricted to persons with a need to know, and safeguarding, protecting, and marking methods for sensitive/critical information will be utilized. As required, TSA sought approval from the Office of Management and Budget for a revision to Office of Management and Budget Control No. 1652-0074 for the collection of information under this Security Directive.

TSA is issuing this Security Directive in consultation with the Cybersecurity and Infrastructure Security Agency, the Department of Defense, and the Department of Transportation. TSA will seek review and ratification of this Security Directive by the Transportation Security Oversight Board. The Transportation Security Oversight Board is

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5 See also 49 U.S.C. 114(f); 49 CFR part 1503.
6 See also 49 U.S.C. 114(f).
7 See OMB Control No. 1670-0037.
8 Presidential Policy Directive (PPD) 41 requires Federal agencies to rapidly share incident information with each other to achieve unity of governmental effort. See PPD-41 § III.D (“Whichever Federal agency first becomes aware of a cyber incident will rapidly notify other relevant Federal agencies in order to facilitate a unified Federal response and ensure that the right combination of agencies responds to a particular incident”). Furthermore, for purposes of information shared with the Department of Homeland Security pursuant to this directive, cyber incident responders with responsibilities under PPD-41 are “covered” persons with a “need to know,” as provided by 49 CFR 1520.7 and 1520.11, respectively.
9 See 49 CFR 1520.5(b)(5) and https://www.tsa.gov/for-industry/sensitive-security-information.
statutorily required to "review and ratify or disapprove" emergency regulations and security directives issued by TSA under 49 U.S.C. 114(l)(2). See 49 U.S.C. 114(l)(2)(B) and 115(c)(1). If, for whatever reason, the Transportation Security Oversight Board fails to ratify any section or subsection of this Security Directive, or deems any section or subsection inapplicable, the remainder of this Security Directive shall not be affected.

II. ACTIONS REQUIRED

A. Applicability, Deadlines for Compliance, and Scope

1. Applicability: The provisions of this Security Directive apply to the following Owner/Operators:

   a. Freight Railroad Owner/Operators subject to applicability described in 49 CFR 1580.101.

   b. Other TSA-designated Freight and Passenger Railroad Owner/Operators: This Security Directive also applies to Owner/Operators of railroads designated by TSA. TSA will notify these Owner/Operator(s) and provide specific compliance deadlines for the requirements in this Security Directive.


   Note: If an Owner/Operator determines they have no Critical Cyber Systems, as defined in Section VII of this Security Directive, they must notify TSA in writing within 60 days of the effective date of this Security Directive. In the event that an Owner/Operator's method of operation changes, they must reevaluate whether they have a Critical Cyber System, and if so, the requirements of this Security Directive are applicable.

B. Cybersecurity Implementation Plan

1. No later than 120 days after the effective date of this Security Directive, Owner/Operators must submit a Cybersecurity Implementation Plan to SurfOps-SD@tsa.dhs.gov for TSA approval.

2. The Cybersecurity Implementation Plan must provide all the information required by Sections III.A. through III.E. of this Security Directive and describe in detail the Owner/Operator's defense-in-depth plan, including physical and logical security controls, for meeting each of the requirements in Sections III.A. through III.E.

3. Once approved by TSA, the Owner/Operator must implement and maintain all measures in the TSA-approved Cybersecurity Implementation Plan in accordance with the schedule as stipulated in the plan.
III. CYBERSECURITY MEASURES

The Owner/Operator must:

A. Identify the Owner/Operator’s Critical Cyber Systems as defined in Section VII of this Security Directive.

B. Implement network segmentation policies and controls designed to prevent operational disruption to the Operational Technology system if the Information Technology system is compromised or vice-versa. As applied to Critical Cyber Systems, these policies and controls must include:

1. A list and description of —
   a. Information Technology and Operational Technology system interdependencies;
   b. All external connections to the Information Technology and Operational Technology system;
   c. Zone boundaries, including a description of how Information Technology and Operational Technology systems are defined and organized into logical zones based on criticality, consequence, and operational necessity; and
   d. Policies to ensure Information Technology and Operational Technology system services transit the other only when necessary for validated business or operational purposes.

2. An identification and description of measures for securing and defending zone boundaries, that includes security controls—
   a. To prevent unauthorized communications between zones; and
   b. To prohibit Operational Technology system services from traversing the Information Technology system, and vice-versa, unless the content is encrypted or, if not technologically feasible, otherwise secured and protected to ensure integrity and prevent corruption or compromise while the content is in transit.

C. Implement access control measures, including those for local and remote access, to secure and prevent unauthorized access to Critical Cyber Systems. These measures must incorporate the following policies, procedures, and controls:

1. Identification and authentication policies and procedures designed to prevent unauthorized access to Critical Cyber Systems that include—
a. A policy for memorized secret authenticators resets that includes criteria for when resets must occur\textsuperscript{10}, and

b. Documented and defined mitigation measures for components of Critical Cyber Systems that will not fall under the policy required by the preceding subparagraph (III.C.1.a), and a timeframe to complete these mitigations.

2. Multi-factor authentication, or other logical and physical security controls that supplement password authentication to provide risk mitigation commensurate to multi-factor authentication. If an Owner/Operator does not apply multi-factor authentication for access to Operational Technology components or assets, the Owner/Operator must specify what compensating controls are used to manage access.

3. Policies and procedures to manage access rights based on the principles of least privilege and separation of duties. Where not technically feasible to apply these principles, the policies and procedures must describe the compensating controls that the Owner/Operator will apply.

4. Enforcement of standards that limit the availability and use of shared accounts to those that are critical for operations, and then only if absolutely necessary. When the Owner/Operator uses shared accounts for operational purposes, the policies and procedures must ensure—

a. Access to shared accounts is limited through account management that uses principles of least privilege and separation of duties; and

b. Individuals who no longer need access do not have knowledge of the password necessary to access the shared accounts.

5. Regularly updated schedule for review of existing domain trust relationships to ensure their necessity and establish policies to manage these relationships.

D. Implement continuous monitoring and detection policies and procedures that are designed to prevent, detect, and respond to cybersecurity threats and correct anomalies affecting Critical Cyber Systems. These measures must include:

1. Capabilities to—

a. Defend against malicious email, such as spam and phishing emails, to preclude or mitigate against adverse impacts to operations;

\textsuperscript{10} This policy should be compliant with the most current version of the National Institute of Standards and Technology’s Special Publication 800-63, Digital Identity Guidelines (available at https://csrc.nist.gov/publications/detail/sp/800-63/3/final).
b. Block ingress and egress communications with known or suspected malicious Internet Protocol addresses;

c. Control impact of known or suspected malicious web domains or web applications, such as by preventing users and devices from accessing malicious websites;

d. Block and prevent unauthorized code, including macro scripts, from executing; and

e. Monitor and/or block connections from known or suspected malicious command and control servers (such as Tor exit nodes, and other anonymization services).

2. Procedures to—

a. Audit unauthorized access to internet domains and addresses;

b. Document and audit any communications between the Operational Technology system and an external system that deviates from the Owner/Operator’s identified baseline of communications;

c. Identify and respond to execution of unauthorized code, including macro scripts; and

d. Implement capabilities (such as Security, Orchestration, Automation, and Response) to define, prioritize, and drive standardized incident response activities.

3. Logging policies that—

a. Require continuous collection and analyzing of data for potential intrusions and anomalous behavior on Critical Cyber Systems and other Operational and Information Technology systems that directly connects with Critical Cyber Systems; and

b. Ensure data is maintained for sufficient periods, to provide effective investigation of cybersecurity incidents.

4. Mitigation measures or manual controls to ensure industrial control systems can be isolated when a cybersecurity incident in the Information Technology system creates risk to the safety and reliability of the Operational Technology system.\(^1\)

E. Reduce the risk of exploitation of unpatched systems through the application of security patches and updates for operating systems, applications, drivers, and firmware on Critical

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\(^1\) See related requirement in section C.1.a. in the SD 1580-21-01 series.
Cyber Systems consistent with the Owner/Operator’s risk based methodology. These measures must include:

1. A patch management strategy that ensures all critical security patches and updates on Critical Cyber Systems are current.

2. The strategy required by section III.E.1. must include:
   a. The risk methodology for categorizing and determining criticality of patches and updates, and an implementation timeline based on categorization and criticality; and
   b. Prioritization of all security patches and updates on the Cybersecurity and Infrastructure Security Agency's Known Exploited Vulnerabilities Catalog.\(^{12}\)

3. If the Owner/Operator cannot apply patches and updates on specific Operational Technology systems without causing a severe degradation of operational capability to meet necessary capacity, the patch management strategy must include a description and timeline of additional mitigations that address the risk created by not installing the patch or update.

F. Develop a Cybersecurity Assessment Program for proactively assessing and auditing cybersecurity measures.

1. The Owner/Operator must develop a Cybersecurity Assessment Program for proactively assessing Critical Cyber Systems to ascertain the effectiveness of cybersecurity measures and to identify and resolve device, network, and/or system vulnerabilities.

2. The Cybersecurity Assessment Program required by Section III.F.1. must –
   a. Assess the effectiveness of the Owner/Operator’s TSA-approved Cybersecurity Implementation Plan;
   b. Include an architectural design review to be conducted within the first 12 months after the Cybersecurity Implementation Plan approval and at least once every two years thereafter. An architectural design review contains verification and validation of network traffic, a system log review, and analysis to identify cybersecurity vulnerabilities related to network design, configuration, and interconnectivity to internal and external systems; and
   c. Incorporate other assessment capabilities designed to identify vulnerabilities based on evolving threat information and adversarial capabilities, such as

\(^{12}\) Available at: https://www.cisa.gov/known-exploited-vulnerabilities-catalog.
penetration testing of Information Technology systems, including the use of “red” and “purple” team (adversarial perspective) testing.

3. No later than 60 days after TSA’s approval of the Owner/Operator’s Cybersecurity Implementation Plan, the Owner/Operator must submit the annual plan for their Cybersecurity Assessment Program to SurfOps-SD@tsa.dhs.gov. This plan must describe the Cybersecurity Assessment Program required by Section III.F.1, including the schedule for specific actions. The Owner/Operator must update this plan on an annual basis and submit it no later than one year from the date of the previous plan’s submission.

IV. RECORDS

A. Use of previous plans, assessments, tests, and evaluations. As applicable, Owner/Operators may use previously developed plans, assessments, tests, and evaluations to meet the requirements of this Security Directive. If the Owner/Operator relies on these materials, they must include an index of the records and their location organized in the same sequence as the requirements in this Security Directive.

B. Protection of sensitive security information. The Owner/Operator must, at a minimum, store and transmit the following information required by this Security Directive consistent with the requirements in 49 CFR part 1520.13

1. Plans and reports; and
2. Audit, testing, or assessment results.

C. Documentation to Establish Compliance

1. The Owner/Operator must make records necessary to establish compliance with this Security Directive available to TSA upon request for inspection and/or copying.

2. TSA may request to inspect or copy the following documents to establish compliance with this Security Directive:

   a. Hardware/software asset inventory, including supervisory control, and data acquisition systems;
   b. Firewall rules;

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13 Owner/Operators may contact SSI@tsa.dhs.gov for more information on how to comply with requirements for the protection of Sensitive Security Information.
c. Network diagrams, switch and router configurations, architecture diagrams, publicly routable internet protocol addresses, and Virtual Local Area Networks.

d. Policy, procedural, and other documents that informed the development, and documented implementation of, the Owner/Operator’s Cybersecurity Implementation Plan, Cybersecurity Incident Response Plan, Cybersecurity Assessment Program, and assessment or audit results.

e. Data providing a “snapshot” of activity on and between Information and Operational Technology systems such as—

i. Log files;

ii. A capture of network traffic (e.g., packet capture (PCAP)), not to exceed a period of twenty-four hours, as identified and directed by TSA;

iii. “East-West Traffic” of Operational Technology systems/sites/environments within the scope of this Security Directive’s requirements; and

iv. “North-South Traffic” between Information and Operational Technology systems, and the perimeter boundaries between them.

f. Any other records or documents necessary to establish compliance with this Security Directive.

V. PROCEDURES FOR SECURITY DIRECTIVES

A. General Procedures

1. Confirm Receipt. Immediately provide written confirmation of receipt of this Security Directive via e-mail to SurfOps-SD@tsa.dhs.gov;

2. Dissemination. Immediately disseminate the information and measures in this Security Directive to corporate senior management and security management representatives. The Owner/Operator must provide the applicable security measures in this Security Directive to the Owner/Operator’s direct employees and authorized representatives responsible for implementing applicable security measures as necessary to ensure compliance.

B. Comments. Owner/Operators may comment on this Security Directive by submitting data, views, or arguments in writing to TSA via e-mail at TSA-Surface@tsa.dhs.gov. Any comments referring to specific measures in this Security Directive must be protected in accordance with the requirements in 49 CFR part 1520. TSA may amend the Security Directive based on comments received. Submission of a comment does not delay the effective date of the Security Directive or requirement to comply with the provisions of the Security Directive.
VI. **AMENDMENTS TO CYBERSECURITY IMPLEMENTATION PLAN**

A. *Changes to ownership or control of operations.* An Owner/Operator required to submit a Cybersecurity Implementation Plan under Section II.B. of this Security Directive must submit a request to amend its Cybersecurity Implementation Plan if, after approval, there are any changes to the ownership or control of the operation.

B. *Changes to conditions affecting security.* An Owner/Operator required to submit a Cybersecurity Implementation Plan under Section II.B. of this Security Directive must submit a request to amend its Cybersecurity Implementation Plan if, after approval, the Owner/Operator makes, or intends to make, permanent changes to the policies, procedures, or measures approved by TSA, including, but not limited to changes to address:

1. Determinations that a specific policy, procedure, or measure in the Cybersecurity Implementation Plan is ineffective based on results of the audits and assessments required under Section III.F. of this Security Directive; or

2. The Owner/Operator has identified or acquired new or additional Critical Cyber Systems or capabilities for meeting the requirements in the Security Directive that have not been previously approved by TSA.

C. *Permanent change.* For purposes of this section, a “permanent change” is one intended to be in effect for 45 or more days.

D. *Schedule for requesting amendment.* The Owner/Operator must file the request for an amendment to its Cybersecurity Implementation Plan with TSA no later than 50 days after the permanent change takes effect, unless TSA allows a longer time period.

E. *TSA approval.*

1. TSA may approve a requested amendment to a Cybersecurity Implementation Plan if TSA determines that it is in the interest of public and transportation security and the proposed amendment provides the level of security required under this Security Directive.

2. TSA may request additional information from the Owner/Operator before rendering a decision.

F. *Petition for reconsideration.* No later than 30 days after receiving a denial of an amendment to a Cybersecurity Implementation Plan, the Owner/Operator may file a petition for reconsideration following the procedures set in 49 CFR 1570.119.

VII. **DEFINITIONS**
In addition to the terms defined in 49 CFR 1500.3, 1570.3 and Security Directives 1580-21-01 and 1582-21-01, the following terms apply to this Security Directive:

A. **Critical Cyber System** means any Information or Operational Technology system or data that, if compromised or exploited, could result in operational disruption. Critical Cyber Systems include those business services that, if compromised or exploited, could result in operational disruption.

B. **Cybersecurity Architecture Design Review** means a technical assessment based on government and industry-recognized standards, guidelines, and best practices that evaluates systems, networks, and security services to determine if they are designed, built, and operated in a reliable and resilient manner. These reviews must be designed to be applicable to the Owner/Operator’s Information and Operational Technology systems.

C. **Cybersecurity incident** means an event that, without lawful authority, jeopardizes, disrupts or otherwise impacts, or is reasonably likely to jeopardize, disrupt or otherwise impact, the integrity, confidentiality, or availability of computers, information or communications systems or networks, physical or virtual infrastructure controlled by computers or information systems, or information resident on the system. This definition includes an event that is under investigation or evaluation by the Owner/Operator as a possible cybersecurity incident without final determination of the event’s root cause or nature (such as malicious, suspicious, benign).

D. **Days** means calendar days unless otherwise indicated. As used for compliance deadlines, if a requirement must be met on a date that is a national holiday, the compliance deadline will be the next federal business day after the holiday.

E. **East-West traffic** means, in a networking context, the lateral movement of network traffic within a trust zone or local area network.

F. **Group policy** means a centralized place for administrators to manage and configure operating systems, applications and users’ settings that can be used to increase the security of users’ computers and help defend against both insider threats and external attacks.

G. **Information Technology system** means any services, equipment, or interconnected systems or subsystems of equipment that are used in the automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information that fall within the responsibility of the Owner/Operator to operate and maintain.

H. **Interdependencies** means relationships of reliance within and among Information and Operational Technology systems that must be maintained for those systems to operate and provide services.
I. **Memorized secret authenticator** means a type of authenticator comprised of a character string intended to be memorized by, or memorable to, the subscriber, permitting the subscriber to demonstrate something they know as part of an authentication process.

J. **Necessary capacity** means the Owner/Operator’s determination of capacity to support their business critical functions required for railroad operations and supply chain expectations.

K. **North-South traffic** means network traffic that moves through a perimeter boundary into another trust level.

L. **Operational disruption**, for purposes of this Security Directive, means a deviation from or interruption of necessary capacity that results from a compromise or loss of data, system availability, system reliability, or control of a railroad subject to this Security Directive.

M. **Operational Technology system** is a general term that encompasses several types of control systems, including industrial control systems, supervisory control and data acquisition systems, distributed control systems, and other control system configurations, such as programmable logic controllers, fire control systems, and physical access control systems, often found in the industrial sector and critical infrastructure. Such systems consist of combinations of programmable electrical, mechanical, hydraulic, pneumatic devices or systems that interact with the physical environment or manage devices that interact with the physical environment.

N. **Owner/Operator** means a railroad carrier that operates rolling equipment on track that is part of the general railroad system of transportation.

O. **Phishing** means tricking individuals into disclosing sensitive personal information through deceptive computer-based means such as internet web sites or e-mails using social engineering or counterfeit identifying information.

P. **Security, Orchestration, Automation, and Response (SOAR)** means capabilities that enable Owner/Operators to collect inputs monitored by the security operations team. For example, alerts from the security information and event management system and other security technologies — where incident analysis and triage can be performed by leveraging a combination of human and machine power — help define, prioritize and drive standardized incident response activities. These capabilities allow an Owner/Operator to define incident analysis and response procedures in a digital workflow format.

Q. **Shared account** means an account that is used by multiple users with a common authenticator to access systems or data. A shared account is distinct from a group account, which is a collection of user accounts that allows administrators to group similar user accounts together in order to grant them the same rights and permissions. Group accounts do not have common authenticators.
R. *Spam* means electronic junk mail or the abuse of electronic messaging systems to indiscriminately send unsolicited bulk messages.

S. *Tor*, also known as The Onion Router, means software that allows users to browse the web anonymously by encrypting and routing requests through multiple relay layers or nodes. Tor software obfuscates a user's identity from anyone seeking to monitor online activity (such as nation states, surveillance organizations, information security tools). This deception is possible because the online activity of someone using Tor software appears to originate from the Internet Protocol address of a Tor exit node, as opposed to the address of the user's computer.

T. *Trust relationship* means an agreed upon relationship between two or more system elements that is governed by criteria for secure interaction, behavior, and outcomes relative to the protection of assets. This term refers to trust relationships between system elements implemented by hardware, firmware, and software.

U. *Unauthorized access of an Information Technology or Operational Technology system* means access from an unknown source; access by a third party or former employee; an employee accessing systems for which he or she is not authorized; and may include a non-malicious Owner/Operator policy violation such as the use of a shared credential by an employee otherwise authorized to access it.

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