

The Office of Infrastructure Protection

National Protection and Programs Directorate
Department of Homeland Security

Chemical Facility Anti-Terrorism Standards (CFATS):
CFATS Frequently Asked Questions

DHSChemSecurityTalks - West

June 2018



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Agenda

- **Why did my tier change?**
- **Do I need to edit my Top-Screen?**
- **Do I need to edit my Site Security Plan?**
- **How do I comply with the Personnel Surety Program?**



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Why Did My Tier Change?

- New tools were released in fall 2016; facilities began receiving new tiers in April 2017
- As of May, 2018 DHS has received nearly 37,000 CSAT 2.0 Top-Screen submissions
- DHS completed sending out all retiering notifications in fall 2017 and expects retiering to be complete by fall 2018

| | |
|----------------------|---|
| Vulnerability | Higher design pressure of a storage container |
| | Below-grade storage |
| | Larger, less portable COI containers |
| | COI is not shipped from the facility |
| Consequence | Topography surrounding facility |
| | Potentially exposed population surrounding facility |
| | COI toxicity |
| | COI flammability |
| | COI explosive energy |
| | COI quantity and concentration |
| | COI storage: container location and pressure rating |
| | COI storage: types of packaging |
| | COI precursor characteristics: toxicity/exp. energy |
| | Mode of shipping |
| Threat | Specific COI |
| | Mode of Shipment |



Tiering Trends and Projections

- DHS began issuing tiering letters to facilities based on the enhanced methodology beginning April 4, 2017
- All facilities that were high-risk (Tier 1-4) prior to CSAT 2.0 have been notified of their revised tier.
 - Approximately **36%** of the previous high-risk population remained at the **same tier**
 - Approximately **48%** of the previous high-risk population moved from one tier to **another tier**
 - Approximately **15%** of the **previous high-risk** population has been determined to be **not high-risk**
 - Approximately **4%** of the **previous not high-risk** population has been

Reasons for Changes in Tiering

Physics Based Modeling for Tiering

Population Distribution for Release

Adding or Removal of COI

Facility Permanently Closed or Sold



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Do I Need to Update My Top-Screen?

Changes in COI trigger the need to submit a Top-Screen

- If a facility possesses COI in quantities that meets or exceeds the STQ for any COI, a Top-Screen must be submitted within **60 days** from the time you come into possession
- A facility must file a Top-Screen to report all COI holdings at or above the STQ regardless of how long the facility is in possession of the COI, unless an extension or exclusion applies to them.
- Covered Facilities should submit an updated Top-Screen within **60 days** of undergoing a change in COI, which includes:
 - An increase in quantity in previously submitted COI
 - A change in COI properties, packaging, and/or location



Do I Need to Update my SSP?

Edits NOT Required

- Facility is no longer determined to be high risk
- Tiering letter removes previously tiered Chemical of Interest (COI)
- Tier decreases for previously tiered COI

OR

- Tier changes but SSP contains appropriate security measures

Edits Required

- Tiering letter adds new COI
- Tiering letter increases tier for current tiered COI
- Tiering letter adds new security concern for COI

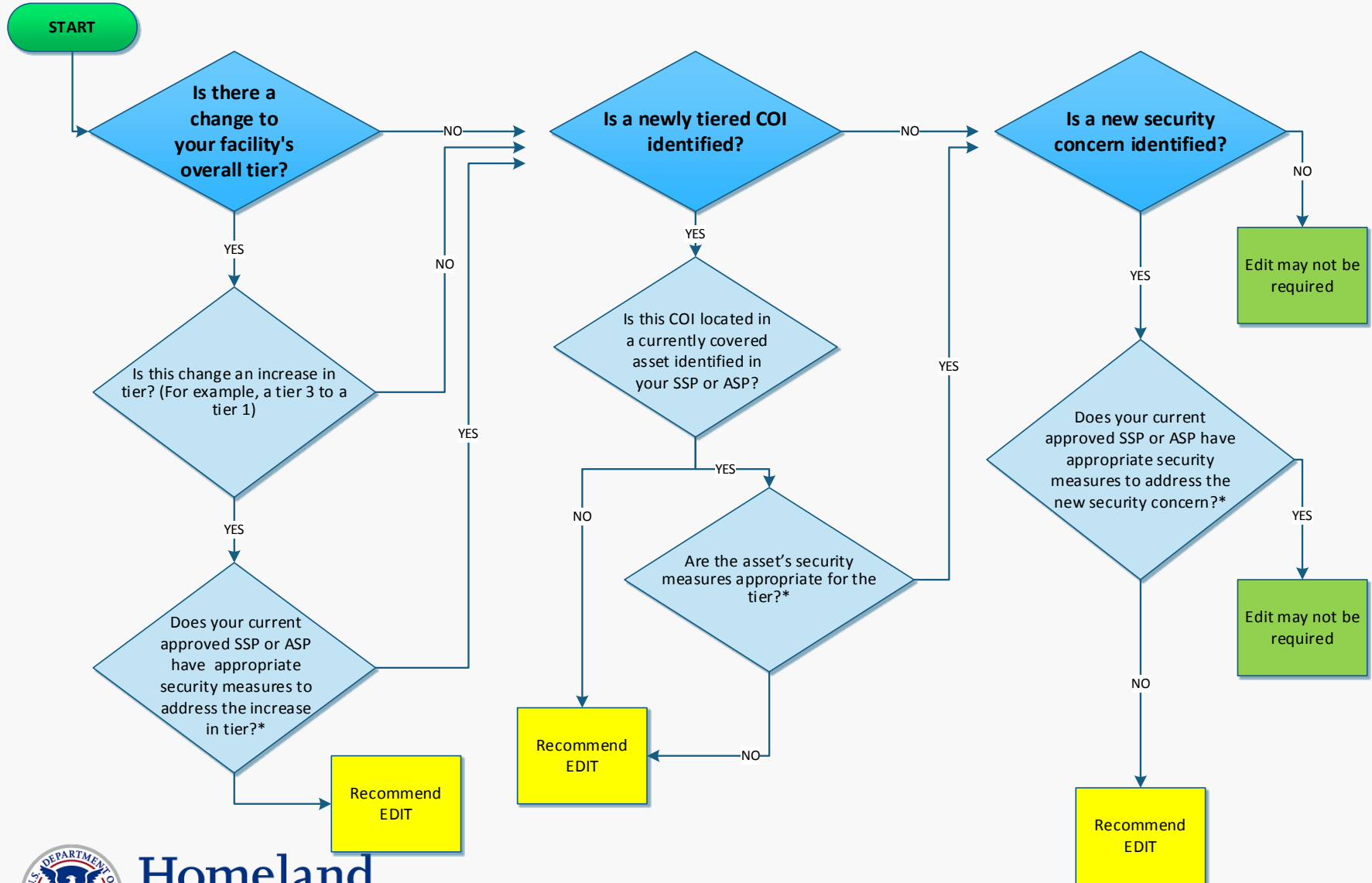
AND

- Current SSP does not contain measures appropriate to address this change



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Factors That Trigger SSP Edits



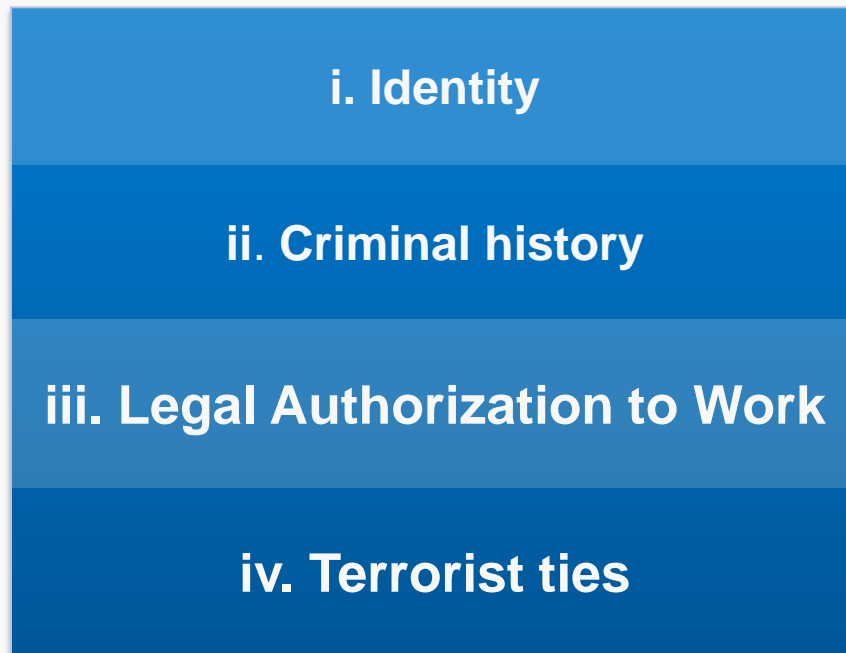
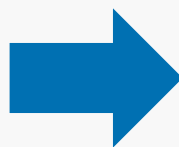
Editing the SSP/ASP

- Facilities have the ability to edit their SSP/ASP by unlocking it within CSAT, or contacting the help desk or their ISCD contact
- Facilities must implement their approved plan until the resubmission receives approval
- When editing, facilities should:
 - Include new planned measures for proposed changes to the security posture
 - Remove completed planned measures and replace with existing measures
 - Confirm or update critical assets and their associated security measures
 - Add detail to current security measures
- Check out: <https://www.dhs.gov/csat-ssp-revisions>



What is the Personnel Surety Program?

- Risk-Based Performance Standards (RBPS) 12 – Personnel Surety requires facilities to perform background checks on affected individuals which includes checks to verify



- RBPS 12(iv), screening for terrorist ties, is currently being implemented for Tier 1 and 2 facilities



Options for Compliance

Escorting Visitors



Option 1*

- Direct Vetting



Option 2*

- Use of Vetting Conducted Under Other DHS Programs



Option 3

- Electronic Verification of TWIC



Option 4

- Visual Verification

**Facilities submit information through the PSP Application for streamlined and effective compliance*



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Who is an “affected individual”?

1. **Facility personnel** who have or are seeking access to restricted areas or critical assets at high-risk chemical facilities

2. **Unescorted visitors** who have or are seeking access to restricted areas or critical assets at high-risk chemical facilities



- High-risk facilities may classify particular contractors or categories of contractors either as “facility personnel” or as “visitors.”
 - This determination should be facility-specific based on the facility’s security considerations, operational requirements, and business practices.



Personnel Surety Program

Application:

Demo



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For more information, visit:
www.dhs.gov/critical-infrastructure

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