CFATS Personnel Surety Program
Demonstration and Lessons Learned

Zeina Azar
Standardization and Evaluation Section Chief (Acting), CFATS Operations Branch, CISA Chemical Security
Today’s Session Will Cover …

Personnel Surety Overview

- Options
- Roles
- Considerations

Chemical Security Assessment Tool (CSAT) Demo

- SSP Completion
- PSP Tab and Submission of Affected Individuals
What Is the Personnel Surety Program?

- Risk-Based Performance Standards (RBPS) 12 – Personnel Surety requires facilities to perform four types of background checks on affected individuals.

- RBPS 12(iv), screening for terrorist ties, applies to all CFATS-covered facilities Tiers 1-4.

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>I. Identity</td>
<td></td>
</tr>
<tr>
<td>II. Criminal History</td>
<td></td>
</tr>
<tr>
<td>III. Legal Authorization to Work</td>
<td></td>
</tr>
<tr>
<td>IV. Terrorist Ties</td>
<td></td>
</tr>
</tbody>
</table>
Rollout Plan

- Facility opens SSP/ASP without notification
- Facility receives Notification Letter via CSAT
- Update SSP/ASP
- Approval Letter Issued
- Implement
- Inspected during next Compliance Inspection

30 Days
PSP Tab Enabled
60 Days

Compliance Assistance Visit or Technical Consultation

CISA Chemical Security
December 9, 2020
As a Reminder: Affected Individuals

- Affected individuals are:
  - Facility personnel with or seeking access to restricted areas or critical assets at high-risk chemical facilities
  - Unescorted visitors with or 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 and based on facility security, operational requirements, and business practices.
Options for Compliance: Consideration

Option 1: Direct Vetting
• Removal and Updates

Option 2: Use of Credentials
• Vetting programs
• Unable to verify

Option 3: TWIC Reader
• Type of TWIC readers
• Frequency of verification
• Unable to verify

Option 4: Visual Verification
• Types of credentials
• Visual verification
• Training and policies
• Unable to verify
## Q3.50.340 Personal Surety Program Assertions

Select “Yes” or “No” for all acknowledgements related to the Risk-Based Performance Standard (RBPS) 12(iv) – screening for terrorist ties:

<table>
<thead>
<tr>
<th>Acknowledgement</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility has designated and trained an individual or individual(s) (to include third parties) responsible for RBPS 12(iv)</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Facility certifies that all affected individuals will be covered by one or more of the options listed above, and the facility will comply with RBPS 12(iv).</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Facility has identified how it will safeguard information about affected individuals that is obtained from the CSAT Personnel Surety Program application.</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Facility certifies that it will comply with the timeframe required for the implementation of the CFATS RBPS 12(iv) Personal Surety Program, according to their faculty’s Tier level.</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

- Options 1 and 2 require facilities to provide privacy notices to all affected individuals.
- Options 3 and 4 recommend these notices but are not required.
The PSP Application is only available in CSAT 2.0 after the facility has received a new approval to implement RBPS 12(iv).

**Key considerations prior to approval:**
- How do you want to organize your information?
  - Submitters, Groups, and User-Defined Fields
- Who will be responsible for the initial upload?
- Who will be responsible for recurring uploads?
- How will you ensure your information remains up-to-date?
## CSAT PSP Roles

<table>
<thead>
<tr>
<th>CSAT PSP User Role</th>
<th>Description</th>
</tr>
</thead>
</table>
| **Authorizer / Administrator** | ◀ Can view, edit, and submit information about Affected Individuals under Option 1 or Option 2 in the Corporation group.  
                                  ◀ Can initiate the user registration process for individuals without an existing CSAT user role and assign them PSP Submitter rights. Can assign an existing CSAT user PSP Submitter rights.  
                                  ◀ Can create and manage User Defined Fields (UDF) and groups. |
| **PSP Submitter**           | ◀ Can view, edit, and submit information about Affected Individuals under Option 1 or Option 2 in the group they have been assigned to.  
                                  ◀ There can be multiple PSP submitters per Authorizer  
                                  ◀ A PSP Submitter can only be assigned to one group at a time.  
                                  ◀ Multiple PSP Submitters can be assigned to a group |
Groups and User Defined Fields

**Groups**

- Multiple PSP Submitters can be assigned to each group.
- Can view only names within that group.
- Helps to manage contracts, divisions, branches, or other sets of affected individuals to segregate information from all PSP submitters.

**User Defined Fields**

- Facilities may want to consider user defined fields to sort information by:
  - Facility ID
  - Name
  - Location, or
  - Individual type (e.g., employee, contractor, visitor)
Personnel Surety Resources

- PSP webpage: cisa.gov/cfats-personnel-surety-program
- PSP Toolkit: cisa.gov/publication/cfats-psp-toolkit
  - Sample Questions and Answers
  - Bulk Upload Spreadsheet
  - Privacy Notice
- Fact Sheet: cisa.gov/publication/cfats-personnel-surety-program-fact-sheet
- Video Demo: share.dhs.gov/psp-webinar
- Notice of Implementation: federalregister.gov/d/2019-14591
Q3.50.330 Personnel Surety Program Options

Select which option(s) the facility will utilize to submit information about affected individuals.

- Option 1
- Option 2
- Option 3
- Option 4
- Other
Survey ID: 4056911
Type: SUA/SEP
Due Date: 2019-03-07
Past Due: 2020-12-02 14:11:01
Last Survey Access:

Return to Survey
Request Extension
Q3.50.320 Types of Affected Individuals
Specify the types of affected individuals that the facility has.

☐ Facility personnel (e.g. employees, contractors) with access to the restricted areas or critical assets
☐ Visitors with unescorted access to the restricted areas or critical assets

Additional Information

*High-risk facilities may classify particular contractors or categories of contractors either as “facility personnel” or as “visitors.”

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Q3.50.330 Personnel Surety Program Options
Select which option(s) the facility will utilize to submit information about affected individuals.

☐ Option 1
☐ Option 2
☐ Option 3
☐ Option 4
☐ Other

Q3.50.340 Personnel Surety Program Assertions
Select “Yes” or “No” for all acknowledgments related to the Risk-Based Performance Standard (RBPS) 12(iv) - screening for terrorist ties:

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<td></td>
</tr>
<tr>
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<td></td>
<td></td>
</tr>
</tbody>
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Q3.50.350 Option 1 Affirmation

Select "Yes" or "No" to indicate whether or not the facility affirms that notice has been or will be provided to the affected individuals whose information is being submitted under Option 1 which (1) notifies those individuals that their information is being submitted to DHS for vetting against the Terrorist Screening Database, and in some cases additional information may be requested and submitted in order to resolve a potential match, (2) instructs those individuals how to access their information, (3) instructs those individuals how to correct their information, and (4) instructs those individuals on procedures available to them for redress if they believe their information has been improperly matched by the Department to information contained in the Terrorist Screening Database.

- Yes
- No

Provide additional comments/descriptions of this notice and how it will be provided to affected individuals.

Q3.50.360 Option 1 - Notification to DHS

Does the facility plan to notify DHS via the CSAT Personnel Surety Program Application when an affected individual no longer has access to restricted areas or critical assets?

- Yes
- No

Additional Information

4,000 characters left
Q3.50.530 Option 4 - Visual Verification of Credentials

Select each of the below which are utilized to visually verify credentials or documents accepted under visual verification.

- Comparing a picture on the credential or document to the affected individual in possession of the credential or document.
- Comparing any physical characteristics listed on the credential or document (e.g. height, hair color, eye color) with the physical appearance of the affected individual in possession of the document or credential.
- Checking for tampering.
- Reviewing both sides of the credential or document and checking for the appropriate stock/credential material.
- Checking for an expiration date.
- Checking for any insignia, watermark, hologram, signature or other unique feature.

Describe:

Q3.50.540 Option 4 - Procedures if Unable to Visually Verify Credentials

What will the facility do if it is unable to visually verify an affected individual's credential or document, the credential or document fails visual verification, or the credential or document appears invalid, expired, or fraudulent?
<table>
<thead>
<tr>
<th>Delete</th>
<th>View</th>
<th>First Name</th>
<th>Last Name</th>
<th>Username</th>
<th>E-mail</th>
<th>Last Portal Login</th>
<th>PSP Submitter Access Group</th>
<th>Status</th>
<th>Account Locked?</th>
<th>Administrator</th>
<th>Administrator</th>
</tr>
</thead>
<tbody>
<tr>
<td>✗</td>
<td></td>
<td>Adam</td>
<td>Bengston</td>
<td>adam.bengston</td>
<td><a href="mailto:bengstonasi@oml.gov">bengstonasi@oml.gov</a></td>
<td>2020-04-02 11:42:59</td>
<td>CORPORATION (EMPLOYEE)</td>
<td>Enabled</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>✗</td>
<td></td>
<td>Kelly</td>
<td>Murray</td>
<td>kelly.murray</td>
<td><a href="mailto:kelly.murray@hq.dhs.gov">kelly.murray@hq.dhs.gov</a></td>
<td>2019-09-23 13:14:50</td>
<td>CORPORATION (EMPLOYEE)</td>
<td>Enabled</td>
<td>No</td>
<td></td>
<td></td>
</tr>
<tr>
<td>✗</td>
<td></td>
<td>Regina</td>
<td>Bell</td>
<td>regina.bell</td>
<td><a href="mailto:regina.bell@cisa.dhs.gov">regina.bell@cisa.dhs.gov</a></td>
<td>2020-02-19 13:33:27</td>
<td>No PSP Access</td>
<td>Enabled</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Create Group

<table>
<thead>
<tr>
<th>Group Name</th>
<th>Description</th>
<th>Save</th>
<th>Cancel</th>
</tr>
</thead>
</table>

Export User List

<p>| row | 1 - 3 of 3 |</p>
<table>
<thead>
<tr>
<th>Group name</th>
<th>Description</th>
<th>Number of Submitters</th>
<th>Affected Individuals Submitted by Group</th>
</tr>
</thead>
<tbody>
<tr>
<td>CORPORATION (EMPLOYEES ONLY)</td>
<td>For Submitters that are Employees of the Corporation</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>Company ABC</td>
<td>Company ABC</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>ID</td>
<td>Last Name</td>
<td>First Name</td>
<td>Gender</td>
</tr>
<tr>
<td>----</td>
<td>-----------</td>
<td>------------</td>
<td>--------</td>
</tr>
<tr>
<td>1</td>
<td>Lantinou</td>
<td>Rae</td>
<td>Female</td>
</tr>
<tr>
<td>2</td>
<td>McRoy</td>
<td>Kim</td>
<td>Female</td>
</tr>
<tr>
<td>3</td>
<td>Pigg</td>
<td>Apple</td>
<td>Female</td>
</tr>
<tr>
<td>4</td>
<td>Ayers</td>
<td>Justin</td>
<td>Male</td>
</tr>
<tr>
<td>5</td>
<td>Test</td>
<td>Name</td>
<td>Male</td>
</tr>
<tr>
<td>6</td>
<td>Timberlake</td>
<td>Kelly</td>
<td>Female</td>
</tr>
<tr>
<td>7</td>
<td>Test</td>
<td>Name</td>
<td>Male</td>
</tr>
<tr>
<td>Last Name</td>
<td>First Name</td>
<td>Gender</td>
<td>Birth Year</td>
</tr>
<tr>
<td>-----------</td>
<td>------------</td>
<td>--------</td>
<td>------------</td>
</tr>
<tr>
<td>Lambeau</td>
<td>Rae</td>
<td>Female</td>
<td>1976</td>
</tr>
<tr>
<td>McDoug</td>
<td>Kim</td>
<td>Female</td>
<td>1990</td>
</tr>
<tr>
<td>Ray</td>
<td>Apple</td>
<td>Female</td>
<td>1990</td>
</tr>
<tr>
<td>Spears</td>
<td>Justin</td>
<td>Male</td>
<td>1993</td>
</tr>
<tr>
<td>Test</td>
<td>Name</td>
<td>Male</td>
<td>1994</td>
</tr>
<tr>
<td>Timberlake</td>
<td>Kelly</td>
<td>Female</td>
<td>1987</td>
</tr>
<tr>
<td>Test</td>
<td>None</td>
<td>Male</td>
<td>2001</td>
</tr>
</tbody>
</table>
User Defined Fields are provided for storing any information desired by the facility (e.g., employee ID number, employee/contractor status, etc.) to manage the exchange of electronic records between a high-risk chemical facility’s information systems and the CSAT Personnel Security application. The Department strongly discourages the use of an affected individual’s Social Security Number to manage the exchange of electronic records between a high-risk chemical facility’s information systems and the CSAT Personnel Security application.

<table>
<thead>
<tr>
<th>Remove/Edit</th>
<th>Field ID #</th>
<th>Name</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>134621</td>
<td>Facility</td>
<td>Facility employee</td>
</tr>
<tr>
<td></td>
<td>134641</td>
<td>Test</td>
<td></td>
</tr>
<tr>
<td></td>
<td>134642</td>
<td>Test 2</td>
<td></td>
</tr>
</tbody>
</table>
Affected Individual Record Enrollment Option Selection

- **Option 1**: Input a record to directly vet an affected individual against identifying information of known or suspected terrorists contained in the Terrorist Screening Database (TSDB).

- **Option 2A**: Input a record to verify enrollment of an affected individual in the Transportation Worker Identification Credential (TWIC) Program.
  - **Revert to Option 1**: Select this checkbox if you would like the Department to automatically submit an affected individual’s record under Option 1, when the Department is no longer able to verify an affected individual that was previously submitted and verified under Option 2.

- **Option 2B**: Input a record to verify enrollment of an affected individual in the Hazardous Material Endorsement (HME) Program.

- **Option 2C**: Input a record to verify enrollment of an affected individual in the Trusted Traveler Programs, which includes:
  - NEXUS
  - Free and Secure Trade (FAST)
  - Global Entry
  - Secure Electronic Network for Travelers Rapid Inspection (SENTRI)

**NOTE**: Verifying an affected individual’s enrollment in the TWIC Program, HME Program or one of the Trusted Traveler Programs is optional. If it is administratively easier for a high-risk chemical to do so.
Option 2A - Information Necessary to Identify Individuals with TWIC

Personal Information

* Last Name:  
First Name:  
Middle Name:  
Suffix:  

* Date of Birth: mm/dd/yyyy

Gender/Citizenship Information

If the affected individual is a U.S. Person (U.S. Citizens and Nationals as well as U.S. lawful permanent residents) you must provide Country of Citizenship or Gender.
If the affected individual is NOT a U.S. Person, you must provide Country of Citizenship and Alien Registration Number or Passport Information.

* Country of Citizenship:  
Alien Registration Number:  

Or

* Gender:  

TWIC Information (Required)

* TWIC Serial Number:  

* Expiration Date Displayed on TWIC: mm/dd/yyyy
### Errors Found

*Affected Individuals will not be submitted until the errors are corrected and you click the submit button.*

<table>
<thead>
<tr>
<th>Full Name of Affected Individual</th>
<th>Alias Associated with Affected Individual</th>
<th>Date &amp; Place of Birth of Affected Individual</th>
<th>Physical Description</th>
<th>Citizenship</th>
<th>Passport Info (Non-U.S. Citizen)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cox, Sarah</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Johnson, Michael</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Smith, Bill</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

The date must match mm/dd/yyyy format.
Zeina Azar
Section Chief (Acting)
CFATS Operations
CISA Chemical Security
Zeina.Azar@cisa.dhs.gov