



Chemical Facility Anti-Terrorism Standards: Expedited Approval Program

The Cybersecurity and Infrastructure Security Agency's (CISA) Chemical Facility Anti-Terrorism Standards (CFATS) program works with high-risk facilities to ensure they have security measures in place to reduce the risk of certain hazardous chemicals from being weaponized. High-risk facilities must develop a security plan tailored to their tier level and unique circumstances. High-risk facilities designated as a Tier 3 or 4 have the option to use the Expedited Approval Program (EAP) for approval of their security plan.



Expedited Approval Program (EAP)

The CFATS program follows a risk-based approach that analyzes information submitted by facilities to CISA through an online survey known as a Top-Screen. If deemed to be high-risk, CISA assigns the facility to one of four tiers with Tier 1 representing the highest risk. CISA requires high-risk facilities to develop and implement a Site Security Plan (SSP) or Alternative Security Program (ASP) that meet the applicable risk-based performance standards (RBPS).

An additional option for facilities to get security plans approved called the Expedited Approval Program (EAP) was established following the 2014 reauthorization of the CFATS program. The EAP provides an optional process through which facilities assigned a Tier 3 or 4 may receive expedited approval of their SSPs and enter directly into a regular cycle of compliance inspections, removing the requirement for a pre-approval authorization and authorization inspection.

CISA has published guidance for facilities that elect to participate in the program at www.cisa.gov/publication/cfats-expedited-approval-program. This guidance was developed using a number of sources, including best practices drawn from SSPs. Facility participation in the EAP is voluntary. Tier 1 and 2 facilities are ineligible for the program.



The Expedited Approval Program provides an optional process through which certain facilities may receive an expedited approval of their SSP.



EAP SSP and the RBPS

The 18 risk-based performance standards are nonprescriptive in nature, allowing facilities the flexibility to select the most cost-effective measures or activities in order to comply with CFATS. However, the requirements for the EAP are prescriptive in nature, offering more detailed security measures than what is found in the RBPS Guidance Document. Facilities that choose to submit an EAP SSP must develop their plan by adopting these prescriptive measures.

Material Deviation

Facilities may also choose to incorporate measures in their EAP SSP that materially deviate from the measures in the EAP guidance, provided that they include sufficient justification that their measures meet the applicable portions of the relevant RBPS. If a facility includes a material deviation, it must:

1. Identify the deviation for the specific security measure in the SSP.
2. Explain how the deviating measure meets the relevant portions of the RBPS and provides levels of security comparable to the prescriptive measure(s) outlined in the guidance.

The EAP Guidance Document contains examples of an EAP SSP, as well as material deviations and their applicable portions of their relevant RBPS.

Submitting an EAP SSP

Any facility that elects to submit their security plan under the EAP must notify CISA of its intention at least 30 days prior to submitting the security plan. Facilities that are assigned a Tier 3 or 4 have 120 days after receiving their Tiering Letter to submit their EAP SSP. Notification of intention to submit an EAP SSP as well as EAP SSP submission occurs via the Chemical Security Assessment Tool (CSAT).

CISA may find an EAP SSP to be facially deficient if it does not include existing and/or planned measures which satisfy all applicable RBPS, or if the facility materially deviates from the guidance and the deviation does not meet the relevant portions of the RBPS and/or provide levels of security comparable to the measures outlined in the EAP guidance.

EAP Compliance Inspections

Facilities that elect to participate in the EAP enter directly into a regular cycle of compliance inspections upon approval of their SSP. The purpose of a Compliance Inspection (CI) is to ensure that a facility continues to fully implement the existing and planned security measures in their approved SSP.

During a CI, CISA inspectors verify that the equipment, processes, and procedures are sufficiently meeting the RBPS and that any required actions have been implemented and are sustainable. The inspection team will verify the status, accuracy, and timelines of all material deviations and planned measures identified within the EAP SSP. If, during or after a compliance inspection of an expedited approval facility, CISA determines that planned or implemented security measures are insufficient to meet the RBPS based on misrepresentation, omission, or an inadequate description of the site, it may require additional security measures, or suspend the certification of the facility.

Tools and Resources

- CFATS Resources: www.cisa.gov/cfats-resources
- CFATS Process: www.cisa.gov/cfats-process
- EAP: www.cisa.gov/cfats-expedited-approval-program
- EAP Guidance: www.cisa.gov/publication/cfats-expedited-approval-program
- CFATS Compliance Inspections: www.cisa.gov/cfats-covered-chemical-facilities or www.cisa.gov/publication/cfats-compliance-inspections-fact-sheet
- Request a Compliance Assistance Visit: www.cisa.gov/request-compliance-assistance-visit
- Request a CFATS Presentation: www.cisa.gov/request-cfats-presentation
- CFATS Knowledge Center: csat-help.dhs.gov
- Chemical Security Assessment Tool (CSAT) Help Desk (technical assistance): Call 1-866-323-2957 or email CSAT@hq.dhs.gov

Contact information

For any questions or comments, email CFATS@hq.dhs.gov or visit www.cisa.gov/cfats.