

# Chemical Facility Anti-Terrorism Standards: Tiering Methodology

To determine if facilities that possess hazardous chemicals—known as chemicals of interest (COI)—are high-risk under the Chemical Facility Anti-Terrorism Standards (CFATS) program, the Cybersecurity and Infrastructure Security Agency (CISA) uses a risk-based tiering methodology that incorporates aspects of vulnerability, consequence, and threat.



#### What Is CFATS?

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 that reduce the risk of certain hazardous chemicals from being weaponized. High-risk facilities are assigned to one of four risk-based tiers and must develop a security plan tailored to their tier level and unique circumstances. Appendix A of the CFATS regulation lists more than 300 COI and their respective screening threshold quantities (STQ), concentrations, and security issues. Any facility that manufactures, stores,



or distributes COI at or above the STQ and/or concentration is required to report their holdings to CISA via an online survey—known as the Top-Screen—within 60 days of coming in possession of the COI.



# What Is Risk-Based Tiering?

The CFATS regulation follows a risk-based approach that allows CISA to focus its resources on high-risk chemical facilities. To identify a facility's specific level of risk, CISA analyzes information submitted through the Top-Screen to determine which facilities are high-risk and assigns those facilities to one of four tiers with Tier 1 representing the highest risk.



## **Enhanced Tiering Methodology**

In 2013, DHS undertook a thorough review of the CFATS risk-tiering methodology. This included a peer review of the prior methodology conducted by a panel of experts drawn from across industry, academia, and government; a review of the proposed new methodology by external experts from industry, government, and the Homeland Security Studies and Analysis Institute; and an independent verification by Sandia National Laboratories.

In 2016, CISA rolled out the enhanced risk-tiering methodology that accounts for three main elements of risk when determining a facility's tier: threat, vulnerability, and consequence. The enhanced risk-tiering methodology identifies elements of risk based upon each facility's unique circumstances resulting in a more precise risk-tiering determination for each facility.

While much of the methodology is sensitive and/or classified, the following tables provide information to help facilities better understand the types of items that may impact their high-risk status and, as applicable, their risk tiers.

## **Vulnerability**

This variable considers inherent characteristics of the facility and/or assets that reduce vulnerability to a terrorist attack—for example, a COI storage container located in an underground earth formation.

Factors Considered to Reduce Vulnerability	Applicable Security Issue
Higher design pressure of a storage container	Release
Below-grade storage	Release
Larger, less portable COI containers	Theft
COI is not shipped from the facility	<ul><li>Diversion</li><li>Sabotage</li></ul>

### Consequence

This variable incorporates improved tools that allow CISA to more accurately calculate, through physics-based dispersion and blast modeling, the onsite and offsite impacts of COI exploitation and misuse.

Factors Considered for Consequence	Applicable Security Issue
Topography surrounding facility (urban or rural terrain)	Release
Potentially exposed population surrounding facility	Release
COI toxicity	<ul> <li>Release–toxics</li> <li>Theft/Diversion–Weapons of Mass Effect/Chemical Weapons</li> <li>Sabotage</li> </ul>
COI flammability	Release
COI explosive energy	<ul> <li>Release–Explosives (EXP)</li> <li>Theft/Diversion-Explosives/Improvised Explosive Device Precursors (IEDP)</li> </ul>
COI quantity and concentration	<ul><li>Release</li><li>Theft/Diversion</li><li>Sabotage</li></ul>
COI storage: container location and pressure rating	Release
COI storage: types of packaging	Theft/Diversion
COI precursor characteristics: toxicity/explosive energy	Theft/Diversion-Chemical Weapons Precursors/IEDPs
Mode of shipping	Sabotage

#### **Threat**

This variable includes factors informed by the intelligence community that may affect the level of threat of terrorist attack or exploitation for a facility.

Factors Considered for Threat	Applicable Security Issue
Specific COI	<ul><li>Release</li><li>Theft/Diversion</li></ul>
Mode of shipment	<ul><li>Theft/Diversion</li><li>Sabotage</li></ul>



## **Resources and Contact Information**

- CFATS risk-tiering methodology: www.cisa.gov/cfats-tiering-methodology
- Chemical Security Assessment Tool (CSAT) Help Desk (technical assistance):
   Call 1-866-323-2957 or email csat@hq.dhs.gov
- To discuss your specific facility's risk with a Compliance Case Manager or Chemical Security Inspector, email <a href="mailto:CFATS@hq.dhs.gov">CFATS@hq.dhs.gov</a>.