



# Chemical Facility Anti-Terrorism Standards: Top-Screens for Dynamic Business Operations



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## Overview

The Cybersecurity and Infrastructure Security Agency's (CISA) Chemical Facility Anti-Terrorism Standards (CFATS) program works with facilities to ensure they have security measures in place to reduce the risk of certain hazardous chemicals—known as chemicals of interest (COI)—being weaponized.

Under CFATS, any facility that possesses COI at or above a specific concentration and screening threshold quantity (STQ) listed in Appendix A of the CFATS regulation (6 CFR part 27) is required to submit an online Top-Screen survey within 60 days of coming into possession of the chemical. This requirement applies regardless of how long the facility is in possession of the COI. The Top-Screen is reviewed by CISA using a risk-tiering methodology to determine whether a facility is high-risk and assigns high-risk facilities to one of four risk-based tiers. High-risk facilities must develop a security plan tailored to their tier level and unique circumstances.

## Business Operations: Predictive Top-Screen Filing

CFATS-covered facilities must resubmit a Top-Screen to report material changes or modifications to their COI holdings, facility operations, or site configuration within 60 calendar days after the modification, as these may alter their tier. Facilities that have previously submitted a Top-Screen, but are determined to not be high-risk, must also resubmit a Top-Screen if the facility makes any changes to COI holdings.

However, if the business operations at a facility require a constantly fluctuating quantity of COI, then CISA—as a best practice for submitting Top-Screens—recommends that a facility include the highest expected quantity, all possible concentration levels, and all possible packaging types for each COI it anticipates possessing at any given time over the lifecycle of the facility's operations. This ensures more efficient reporting and allows a facility the flexibility to construct a Site Security Plan that reflects how the COI is utilized at the facility throughout its cycle.

### Example of Predictive Top-Screen Filing

If the quantity of COI a facility possesses fluctuates within a business cycle (i.e., a year), it is recommended that the facility identify the highest amount within that cycle on the Top-Screen. This ensures the Top-Screen remains accurate through the business cycle and prevents the facility from having to file multiple Top-Screen survey updates.

## Business Planning: Hypothetical Top-Screen Filing

CISA utilizes a risk-tiering methodology that fully accounts for all elements of risk—consequence, vulnerability, and threat—in order to identify and appropriately tier high-risk chemical facilities. As a facility plans potential, future business changes, the facility may request that CISA conduct an analysis to determine how these changes might impact their tier or determination as high-risk. These changes may include:

- Change in quantity or concentration of COI
- Changes in location of COI
- Changes in storage conditions of COI
- New facility construction

Working with CISA to determine the impact of business decisions prior to completion can help a business make the most efficient and cost-effective choices and ensure CISA and facilities continue to work together to keep the nation and communities secure.

To request a consultation, please email [CFATS@hq.dhs.gov](mailto:CFATS@hq.dhs.gov) with a brief description of the issue and the Facility ID (if the facility is already registered with the CFATS program).

### Top-Screen Submission Tips

CISA has reviewed tens of thousands of Top-Screens submitted by chemical facilities under the CFATS regulation. Based on these reviews, CISA has identified some helpful tips to assist facilities completing and submitting a Top-Screen at [cisa.gov/csats-top-screen-tips](https://cisa.gov/csats-top-screen-tips).

## Facility Closures

A covered chemical facility that has closed must report the closure to CISA so that the facility record may be archived. Notification to CISA is accomplished by submitting a revised Top-Screen, a letter to the agency explaining the closure and subsequent material modification, and any applicable supporting documentation via email, mail, or fax:

- Email: [CSAT@hq.dhs.gov](mailto:CSAT@hq.dhs.gov)
- Mail:  
DHS, CISA, Chemical Security  
245 Murray Lane, SW  
Mail Stop 0610  
Arlington, VA 20598
- Fax: 1-866-731-2728

## Tools and Resources

- CFATS Resources: [cisa.gov/cfats-resources](https://cisa.gov/cfats-resources)
- CFATS Process: [cisa.gov/cfats-process](https://cisa.gov/cfats-process)
- CFATS Appendix A COI: [cisa.gov/appendix-chemicals-interest](https://cisa.gov/appendix-chemicals-interest)
- Chemical Security Assessment Tool (CSAT): [cisa.gov/chemical-security-assessment-tool](https://cisa.gov/chemical-security-assessment-tool)
- CSAT Top-Screen: [cisa.gov/csats-top-screen](https://cisa.gov/csats-top-screen)
- CSAT Portal: [csat.dhs.gov/industry](https://csat.dhs.gov/industry)
- CFATS Tiering Methodology: [cisa.gov/cfats-tiering-methodology](https://cisa.gov/cfats-tiering-methodology)
- Request a Compliance Assistance Visit: [cisa.gov/request-compliance-assistance-visit](https://cisa.gov/request-compliance-assistance-visit)
- CFATS Knowledge Center: [csat-help.dhs.gov](https://csat-help.dhs.gov)
- CSAT Help Desk (technical assistance): Call 1-866-323-2957 or email [CSAT@hq.dhs.gov](mailto:CSAT@hq.dhs.gov)