



IT Security



Supply Chain



OT Security



Insider Threat



Physical Security



Interoperable Communications

Protect Chemicals at Colleges and Universities from Use in a Terrorist Attack



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Overview

Colleges and universities in the United States use chemicals to conduct some of the world's most important research in chemistry, medicine, agriculture, and other fields. They are also home to sports complexes and training facilities. While these chemicals may be used for research or facility maintenance, they also have the potential to be deliberately weaponized by terrorists.

What Is CFATS?

In 2006, Congress authorized the U.S. Department of Homeland Security (DHS) to establish the Chemical Facility Anti-Terrorism Standards (CFATS) program. Managed by the Cybersecurity and Infrastructure Security Agency (CISA), the CFATS program identifies and regulates high-risk chemical facilities to ensure that security measures are in place that reduce the risk of certain chemicals being weaponized.

Appendix A of the CFATS regulation lists more than 300 chemicals of interest (COI) and their respective screening threshold quantity (STQ), concentration, and security issues. If released, stolen or diverted, and/or used as a contaminant, these COI have the potential to cause significant loss of human life and/or health consequences. Any individual or facility in possession of COI that meets or exceeds the STQ and concentration must report those chemicals to CISA through an online survey called a Top-Screen.



Colleges and Universities Under CFATS

Colleges and universities that possess COI are considered chemical facilities under CFATS and may be subject to its regulations. These institutions may possess COI that are regularly used, stored, or made in:

- Agricultural facilities
- Chemistry labs
- Medical programs
- Pool complexes
- Research facilities
- Other facilities

If a facility possesses any COI at or above the STQ listed in Appendix A, the facility must submit a Top-Screen within 60 days of coming into possession of the COI. See 6 CFR § 27.210(a)(1)(i).

Review the Appendix A COI List at cisa.gov/publication/cfats-coi-list.

What's Next?

If a college or university possesses COI at or above the STQ and concentration listed in Appendix A and is not statutorily excluded from CFATS (see cisa.gov/cfats-covered-chemical-facilities), the next steps are:

- Complete the Chemical-terrorism Vulnerability Information (CVI) Authorized User Training to begin the process of reporting COI: cisa.gov/cvi-authorized-user-training.
- Register for a Chemical Security Assessment Tool (CSAT) account to access the Top-Screen survey: csat-registration.dhs.gov.
- Fill out a Top-Screen in CSAT to report COI to CISA: csat.dhs.gov/industry.

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- Based on the submitted information, CISA assesses the overall risk of the facility.
- Facilities assessed as “high-risk” are required to submit a Security Vulnerability Assessment and security plan tailored to the unique security challenges and risks associated with their COI.

More than 150 CISA Chemical Security Inspectors are located nationwide to assist high-risk facilities in selecting security measures that comply with the CFATS regulation.

Colleges and Universities with a Technically Qualified Individual

With certain exceptions, facilities that use release-toxic, release-flammable, or release-explosive COI under the supervision of a “technically qualified individual” do not need to include these COI when calculating their STQ. See 6 CFR § 27.203(b)(2) (ecfr.io/Title-6/Section-27.203) for more information.

Top-Screen and Security Plan Tips

When preparing a Top-Screen, a chemical hygiene officer, environmental manager, risk manager, and campus security personnel may be valuable resources for information about COI on campus.

Colleges and universities are made up of many individual buildings, operations, and areas—only some of which may possess COI. The Top-Screen preparer(s) may choose to register each individual building or the entire campus depending on their resources and security posture.

If a facility receives a high-risk status from CISA, the facility must develop one of two types of security plans (Site Security Plan [SSP] or Alternative Security Program [ASP]) that addresses 18 Risk-Based Performance Standards (RBPS) specified in the CFATS regulation. CISA is committed to helping facilities select and implement security measures that are appropriate for their buildings, operations, and areas and satisfy the RBPS. If a college or university registers the entire campus as one facility, they may decide to implement appropriate security measures at a specific building/location, the entire campus, or a combination thereof.

Failure to Submit a Top-Screen

CISA is committed to helping facility personnel understand and comply with CFATS by providing technical assistance or onsite consultation. However, CISA has the authority to enforce compliance with the program. This can include issuing civil monetary penalties to facilities that fail to submit a Top-Screen or that are found to be in violation of any aspect of the CFATS regulations (6 USC § 624). Learn more at cisa.gov/cfats-enforcement.

Tools and Resources

- CFATS Resources: cisa.gov/cfats-resources
- CFATS Process: cisa.gov/cfats-process
- CFATS Appendix A COI List: cisa.gov/publication/cfats-coi-list
- Chemical Security Assessment Tool (CSAT): cisa.gov/chemical-security-assessment-tool
- Risk-Based Performance Standards (RBPS): cisa.gov/risk-based-performance-standards
- Request a CFATS Presentation: cisa.gov/request-cfats-presentation
- Request a Compliance Assistance Visit: cisa.gov/request-compliance-assistance-visit
- CFATS Knowledge Center: csat-help.dhs.gov
- CSAT Help Desk (technical assistance): Call 1-866-323-2957 or email CSAT@hq.dhs.gov