



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

Chemicals are vital to our economy. They are used to develop medicines that maintain our health, provide refrigeration for our food supply, manufacture fuel for our vehicles and build the microchip that runs our smartphones. In the wrong hands, however, chemicals can be used for great harm.

What Is CFATS?

In 2006, Congress authorized the 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 they have security measures in place that reduce the risk of certain hazardous chemicals from being weaponized. If released, stolen or diverted, and/or used as a contaminant, these chemicals of interest (COI) have the potential to cause significant loss of human life and/or health consequences.



Old Dominion University. (Source: FCI)

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 can have the potential to cause significant loss of human life and/or health consequences. Any individual or facility in possession of with COI that meets or exceeds the STQ and concentration must report their holdings to CISA via an online survey called a Top-Screen.

Colleges and Universities under CFATS

Colleges and universities in the United States 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. These institutions frequently possess COI that are regularly used, stored, or made in:

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

While COI may be used for medical research or facility maintenance, they also have the potential to be deliberately diverted, released, or otherwise misused by terrorists.

What's Next?

If your college or university possesses COI at or above the STQ for any COI listed in Appendix A, you are required to submit a Top-Screen within 60 days of coming into possession. Your next steps are to:

- Complete the Chemical-terrorism Vulnerability Information (CVI) Authorized User training to begin the process of reporting COI: www.cisa.gov/cvi-authorized-user-training.

- Register for a Chemical Security Assessment Tool (CSAT) account to access the Top-Screen survey: <https://csat-registration.dhs.gov>.
- Fill out a Top-Screen in CSAT to report your COI holdings to CISA.
- Based on the information provided, 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 identify and implement security measures that comply with the CFATS regulation.

Colleges and Universities with a Technically Qualified Individual

Facilities that use release-toxic, release-flammable, or release-explosive COI in a laboratory under the supervision of a “technically qualified individual” do not need to include these COI when calculating their STQ. For more information on this provision, please refer to § 27.203(b)(2) of the CFATS regulation: www.gpo.gov/fdsys/pkg/CFR-2016-title6-vol1/pdf/CFR-2016-title6-vol1-sec27-203.pdf.



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.

Upon receiving 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 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 www.cisa.gov/cfats-enforcement.



Tools and Resources

- CFATS Resources: www.cisa.gov/cfats-resources
- CFATS Process: www.cisa.gov/cfats-process
- Appendix A COI List: www.cisa.gov/publication/cfats-coi-list
- Chemical Security Assessment Tool (CSAT): www.cisa.gov/chemical-security-assessment-tool
- Request a CFATS Presentation: www.cisa.gov/request-cfats-presentation
- Request a Compliance Assistance Visit: www.cisa.gov/request-compliance-assistance-visit
- CFATS Knowledge Center: <https://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 questions or comments, please email CFATS@hq.dhs.gov or visit www.cisa.gov/cfats.