



Chemical Facility Anti-Terrorism Standards: Resubmitting a Top-Screen



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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) 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. Changes to COI, facility operations, or site configuration require a new Top-Screen.

Resubmit for Material Modifications

Under the CFATS program, 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 a facility's tier. Examples include:

- The addition or removal of COI at the STQ or concentration.
- Changes to quantity, concentration, location, or packaging of a COI as previously reported on a Top-Screen.



Changes to COI, facility operations, or site configuration require a new Top-Screen.

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.

As a best practice, CISA recommends that a facility include the highest expected quantity, all possible concentration levels, and all possible packaging types of COI it anticipates possessing at a given time over the lifecycle of the facility's operations. This ensures more efficient reporting and allows a facility the flexibility to construct a security plan that reflects how the COI is used at the facility throughout its cycle.

Regular Resubmissions

CFATS-covered facilities are required to update their Top-Screens on a regular basis, as determined by their tier or based on written notification from CISA:

- A Tier 1 or Tier 2 facility must update its Top-Screen 2 years and 60 calendar days after its SSP is approved or 2 years and 60 calendar days after its most recent Top-Screen submission, whichever is later.
- A Tier 3 or Tier 4 facility must update its Top-Screen 3 years and 60 calendar days after its SSP is approved or 3 years and 60 calendar days after its most recent Top-Screen submission, whichever is later.

CISA does not have any periodic resubmissions requirements for facilities that have previously submitted a Top-Screen and are determined to not be high-risk. However, if these facilities make any changes to COI holdings, the Top-Screen should be resubmitted.

Risk-Tiering Methodology

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. The vulnerability variable considers inherent characteristics of the facility and/or assets that reduce vulnerability to a terrorist attack—for example, a COI storage container in an underground earth formation. The consequence variable incorporates physics-based dispersion and blast modeling tools to calculate onsite and offsite impacts of COI exploitation and misuse. The threat variable includes factors informed by the intelligence community that may affect the level of threat of terrorist attack or facility exploitation. Learn more at cisa.gov/cfats-tiering-methodology.

Changes made to any of these components may require a facility to resubmit a Top-Screen.

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 in completing and submitting a Top-Screen at 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
- Mail: Chemical Security, Associate Director
CISA – CHR STOP 0609
Cybersecurity and Infrastructure Security Agency
1310 N. Courthouse Rd.
Arlington, VA 20598-0609
- Fax: 1-866-731-2728

Tools and Resources

- CFATS Resources: cisa.gov/cfats-resources
- CFATS Process: cisa.gov/cfats-process
- Appendix A COI: cisa.gov/appendix-chemicals-interest
- Chemical Security Assessment Tool (CSAT) Top-Screen: cisa.gov/csats-top-screen
- CSAT Portal: csat.dhs.gov/industry
- 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