



IT Security



Supply Chain



OT Security



Insider Threat



Physical Security



Interoperable Communications

Chemical Facility Anti-Terrorism Standards: Top-Screen Submission Considerations



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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 security measures are 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 COI. 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. If a facility submits a Top-Screen that reports the reduction or removal of COI, CISA will request information to verify the updated Top-Screen.

Business Operations: Predictive Top-Screen Filing

The CFATS regulation requires that covered chemical facilities resubmit a Top-Screen to report material changes or modifications to their COI holdings, facility operations, or site security configuration within 60 calendar days after the modification, as these may alter the facility's tier. CISA also requires facilities that have previously submitted a Top-Screen but are determined not to be high-risk to 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.

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 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 storage conditions of COI
- Changes in location of COI
- New facility construction

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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 will ensure CISA and facilities continue to work together to keep our Nation and communities secure. To request a consultation, please email 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).

Redetermination Based on Reduction or Removal of COI

If a facility submits a Top-Screen that reports a reduction in the concentration or quantity below the minimum requirements in Appendix A or the removal of COI altogether, CISA will request an explanation regarding the reduction or removal of COI and will need to verify the information in the updated Top-Screen. The facility should compose a written explanation for the reduction or removal of COI. In the explanation, consider including:

- Explanation of the reduction or removal of the COI (if applicable, include where the COI was shipped)
- The substitute chemical and/or process being used to replace the COI (if applicable, include the Material Safety Data Sheet [MSDS] and/or product label of the replacement product)
- Description of management controls that will ensure the limitation of future COI quantities
- Documentation for permanent change of process, policy, and/or procedure
- Planned future inventory of COI
- Explanation and documentation of closure, sale, or end of lease
- Bill(s) of lading or shipping receipts
- Explanation of error on previous Top-Screen
- Explanation of regulatory exclusion
- Additional documentation to support explanation

The submission of a revised Top-Screen does not stay or defer any existing deadlines applicable to the facility under CFATS. Any such deadline remains in effect unless the facility is specifically notified by CISA of a new deadline based on an approved Chemical Security Assessment Tool (CSAT) Survey Due-Date Extension Request. Once CISA receives the explanation documentation, the facility will be notified of any additional actions.

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 CISA explaining the closure and subsequent material modification, and any applicable supporting documentation.

Submitting Documentation

The explanation letter and any supporting documents can be mailed to CISA, emailed to the CISA representative that contacted the facility, or submitted to the CSAT Help Desk via email or fax.

- Mail: Chemical Security, Associate Director
CISA – CHR STOP 0609
Cybersecurity and Infrastructure Security Agency
1310 N. Courthouse Rd.
Arlington, VA 20598-0609
- Email: CSAT@hq.dhs.gov
- Fax: 1-866-731-2728

Tools and Resources

- CFATS Resources: cisa.gov/cfats-resources
- CFATS Process: cisa.gov/cfats-process
- CSAT Top-Screen Tips: cisa.gov/csats-top-screen-tips
- Request a Compliance Assistance Visit: cisa.gov/request-compliance-assistance-visit
- CSAT Help Desk (technical assistance): Call 1-866-323-2957 or email CSAT@hq.dhs.gov