



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 hands of a terrorist, however, chemicals could potentially be used to cause a significant number of deaths and injuries. The U.S. Department of Homeland Security, through the Infrastructure Security Compliance Division (ISCD), administers the CFATS program by working with facilities to ensure they have security measures in place to reduce the risks associated with certain hazardous chemicals, and prevent them from being exploited in an attack.



Old Dominion University in Norfolk, VA.  
(Source: FCI)

### What is CFATS?

CFATS is a regulatory program (6 CFR Part 27) established in 2007 that addresses chemical security by identifying and regulating high-risk facilities that possess certain chemicals of interest (COI) at specific concentrations and quantities. In 2014, Congress reauthorized and amended the program through the Protecting and Securing Chemical Facilities from Terrorist Attacks Act of 2014 (6 U.S.C. § 621, et seq).

Under CFATS, a chemical facility is any establishment, from a large facility to a single individual, which possesses or plans to possess COI. Colleges and universities are among the many types of facilities that may be determined to be “high risk”.

### 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:

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

### Appendix A and Chemicals of Interest (COI)

Appendix A of the CFATS regulation lists more than 300 COI and their respective screening threshold quantities (STQ). These COI are categorized into three main security issues:

- Release: Toxic, flammable, or explosive chemicals or materials that can be released at a facility.
- Theft or Diversion: Chemicals or materials that, if stolen or diverted, can be converted into weapons using simple chemistry, equipment, or techniques.
- Sabotage: Chemicals or materials that can be mixed with readily available materials.

Any facility that meets or exceeds the STQ for any COI listed in Appendix A is required to report possession of those chemicals to DHS within 60 days via an online survey called a Top-Screen.

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](http://www.gpo.gov/fdsys/pkg/CFR-2016-title6-vol1/pdf/CFR-2016-title6-vol1-sec27-203.pdf)).

## Considerations Specific to Colleges and Universities

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 DHS, the facility must develop one of two types of security plans (Site Security Plan (SSP) or Alternate Security Plans (ASP)) that addresses 18 Risk-Based Performance Standards (RBPS) specified in the CFATS regulation. ISCD 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.

## CFATS Enforcement Actions

ISCD is authorized to pursue civil enforcement action against any facility found in violation of CFATS. ISCD may issue an appropriate order to the facility specifying the violation and steps that must be taken to correct the noncompliance. Violation of such a compliance order may result in the imposition of a civil penalty.

## Tools and Resources

- Risk-Based Performance Standards Guidance (RBPS): [www.dhs.gov/publication/cfats-rbps-guidance](http://www.dhs.gov/publication/cfats-rbps-guidance)
- Expedited Approval Program: [www.dhs.gov/cfats-expedited-approval-program](http://www.dhs.gov/cfats-expedited-approval-program)
- CFATS Penalty Policy: [www.dhs.gov/cfats-penalty-policy](http://www.dhs.gov/cfats-penalty-policy)
- Request a CFATS Presentation to learn about any part of the CFATS regulation from submitting a Top-Screen to editing a security plan: [www.dhs.gov/request-cfats-presentation](http://www.dhs.gov/request-cfats-presentation).
- The CFATS Knowledge Center is an online repository of FAQs, articles, and more: [csat-help.dhs.gov/](http://csat-help.dhs.gov/).
- The Chemical Security Assessment Tool (CSAT) Help Desk provides timely support to chemical facility owners and operators. Call 1-866-323-2957 or email [csat@dhs.gov](mailto:csat@dhs.gov).

## Contact Information

For any questions, comments or concerns, please contact [CFATS@hq.dhs.gov](mailto:CFATS@hq.dhs.gov) or visit [www.dhs.gov/chemicalsecurity](http://www.dhs.gov/chemicalsecurity).