



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. But in the hands of a terrorist, 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 Chemical Facility Anti-Terrorism Standards (CFATS) program by working with facilities to ensure they have security measures in place to reduce the risk of certain hazardous chemicals from being exploited in an attack.

The Protecting and Securing Chemical Facilities from Terrorist Attacks Act of 2014 (6 U.S.C. § 621, et seq), and the CFATS regulation (6 CFR Part 27) provide DHS the authority to enter, inspect, and audit the property, equipment, operations, and records of CFATS covered facilities.



Caution sign at an industrial facility. (Source: DHS)

Compliance Inspection (CI) Overview

The purpose of the CI is to ensure that a facility continues to fully implement the existing and planned security measures in their approved Site Security Plan (SSP) or Alternative Security Program (ASP).

Under CFATS, ISCD inspectors conduct an Authorization Inspection prior to approving a facility's submitted SSP or ASP. After the facility's security plan is approved, they receive a Letter of Approval and enter into the CFATS compliance cycle, which includes regular and reoccurring CIs.

A CI is conducted by ISCD inspectors to verify that the equipment, processes, and procedures described in the facility's approved security plan have been implemented and continue to sufficiently meet the DHS Risk-Based Performance Standards (RBPS); and that any required corrective actions have been implemented and are sustainable. In addition, a CI can be conducted to discuss issues raised by ISCD after a review of the facility's case file.

Scheduling and Notification for a CI

DHS sends the facility a Notice of Inspection via the Chemical Security Assessment Tool (CSAT). In addition, an ISCD inspector contacts the facility site representative by phone and/or email to schedule a date and time. Except in exigent circumstances, ISCD will provide at least a 24-hour notice.

ISCD compares eight factors (seven static and one dynamic) in an automated calculation to schedule CIs. Facilities with a higher score are prioritized. Static factors included in this calculation are a facility's tier, number of planned measures, the time since the last inspection, and compliance history. The eighth factor changes based on new and emerging requirements.

What is the CI Process?

During the Inspection

The ISCD inspection team will conduct an in-brief to cover the purpose and intent of the inspection, review Chemical-terrorism Vulnerability Information (CVI) authorized user status for all personnel present, and any necessary safety instructions that may be required.

The inspection team will review and verify existing security measures, the stage of implementation and effectiveness of planned measures, and significant changes in the security posture since the last inspection. The four methods of verification are: **1) Direct Observation** by touring the facility and viewing restricted areas, **2) Interviews** of individuals with any portion of compliance duties, **3) Document Review** of any items referenced in the security plan, including those maintained pursuant to RBPS 18 – Records, and **4) Testing** of systems and equipment like an intrusion detection system or closed circuit TV.

A facility may want to have the following documents below readily available:

- Chemical inventory list
- Site/facility layout
- Documents describing the progress or completion of planned measures
- All CFATS-related documents and correspondence
- Security standard operation procedure
- Crisis Management Plan (or equivalent)
- Cybersecurity policy and procedures
- Company hiring policy and procedures
- Procedures and records pertaining to the shipping, receiving, storage, and transportation of chemicals
- Security system maintenance/calibration records
- Incidents and breaches of security documentation
- Records for RBPS 18

Appropriate personnel should be available during the CI for interview such as the CSAT submitter, authorizer, and preparer; Facility Security Officer; Cybersecurity Officer; Human Resources representative; and Operations Manager. Not every personnel needs to be present for the entirety of the CI.

After the Inspection

The inspection team will conduct an out-brief of the results, potential concerns, and/or infractions.

- If no issues are raised by the CI, the facility will receive a “Post-Compliance Inspection Status” letter for their continued compliance.
- If issues are raised by the CI, the facility may need to edit and resubmit their security plan or correct infractions based on the inspection team’s findings.

Tools and Resources

- Risk-Based Performance Standards (RBPS) Guidance: www.dhs.gov/publication/cfats-rbps-guidance
- RBPS 18 – Records: www.dhs.gov/cfats-rbps-18-records
- CFATS SSP Submission Tips provides helpful hints for facilities completing their SSP or ASP: www.dhs.gov/cfats-ssp-submission-tips.
- Request a Compliance Assistance Visit to learn more about the CFATS Authorization or Compliance Inspection: www.dhs.gov/cfats-request-compliance-assistance-visit.
- Chemical-terrorism Vulnerability Information: www.dhs.gov/chemical-terrorism-vulnerability-information
- The CSAT Help Desk provides timely support to chemical facility owners and operators. Call 1-866-323-2957 or email csat@hq.dhs.gov.
- The CFATS Knowledge Center is a repository of CFATS FAQs, articles, and more: csat-help.dhs.gov/.

Contact Information

For any questions, comments, or concerns, please email CFATS@hq.dhs.gov or visit www.dhs.gov/chemicalsecurity.