



Colleges and universities in the United States conduct some of the world's most important research in chemistry, medicine, and other fields. These institutions frequently possess chemicals of interest that are regularly used, stored, or even made in:

- Chemistry Labs
- Research Facilities
- Pool Complexes
- Agricultural Facilities
- Medical Programs
- Other Types of Facilities

Unfortunately, many of these same chemicals have the potential to be deliberately diverted, released, or otherwise misused by terrorists.



What are Chemicals of Interest (COI)?

Appendix A lists over 300 Chemicals of Interest (COI) that DHS believes may pose significant risks to human life or health if misused by terrorists. COI are organized by security and vulnerability issues – specifically, COI that a terrorist could: steal, divert, or otherwise acquire to use as a weapon at another time and place (Theft/Diversion COI); or sabotage or contaminate to explode or release in transit (Sabotage COI); or release as an explosive or to form a flammable or toxic cloud (Release COI). DHS uses this list as part of the CFATS process to identify, assess, and secure high-risk facilities. Colleges and universities are among the many types of facilities that possess COI for legitimate uses, and DHS may determine some to be high-risk facilities subject to CFATS.

What is a Facility under CFATS?

In 6 CFR Part 27 a chemical facility is defined as “any establishment that possesses or plans to possess, at any relevant point in time, a quantity of a chemical substance determined by the Secretary to be potentially dangerous or that meets other risk-related criteria identified by the Department.” How a high-risk facility is defined and secured depends on the outcome of DHS’ assessment process and dialogue with the facility. DHS recognizes, for example, that colleges and universities are made up of many individual buildings, operations, and areas, only some of which may possess COI.

Under CFATS, all final high-risk facilities have the flexibility to select and implement security measures in their Site Security Plan (SSP) - subject to approval by the Department - that are appropriate to the facilities’ circumstances and satisfy the risk-based performance standards. DHS works with all high-risk facilities to ensure they have tailored their security measures to address their tier level, site conditions, and other facility specific issues. A college or university with a high-risk facility on campus - such as a research complex - may decide, for example, to implement appropriate security measures only at the high-risk “facility,” as opposed to the entire campus.

The Top-Screen

The Top-Screen is an online questionnaire that collects basic information about a facility's location and operations and is used by DHS to preliminarily determine if the facility is high risk. Any facility that possesses a COI at or above the applicable screening threshold quantities (STQ) listed in Appendix A of CFATS must complete and submit a Top-Screen to DHS within 60 calendar days of coming into possession of COI.

Release COI used in a laboratory under the supervision of a "technically qualified individual" need not be counted toward a facility's STQ. For more information on this provision, please refer to §27.203 (b)(2) of the CFATS regulations or call the DHS CFATS Help Desk at 866-323-2957.

When preparing a Top-Screen, the Chemical Hygiene Officer, Environmental Manager, Risk Manager, and other staff are valuable resources for providing information about COI on campus. Campus security personnel are another valuable resource for completing the CFATS Security Vulnerability Assessment (SVA) and SSP, if required.

Compliance and Enforcement

The CFATS regulation provides that if DHS believes any facility is in violation of the regulation, the Department 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 additional orders assessing civil penalties of \$25,000 per day per violation and/or requiring the facility to cease operations.

DHS Compliance Assistance and Outreach

DHS has developed a variety of tools to facilitate compliance with CFATS:

- **The CSAT Help Desk** provides timely support to chemical facility owners and operators as well as a CFATS tip-line for anonymous chemical facility security reporting. It can be reached at 1-866-323-2957, or at csat@dhs.gov
- **The CFATS Knowledge Center** is an online repository of Frequently Asked Questions, articles, and documents relating to CFATS and Ammonium Nitrate Programs. It can be found by visiting <http://csat-help.dhs.gov/>.
- **Chemical Security Inspectors and other DHS subject matter experts** are available to provide guidance to facilities through outreach meetings, calls, and other engagements.

Contact Information

For more information visit: <http://www.dhs.gov/critical-infrastructure>. To ask a Department representative to speak on the Chemical Facility Anti-Terrorism Standards (CFATS) regulatory program, please contact cfats@hq.dhs.gov.