



The Department of Homeland Security (DHS) regulates security at high-risk chemical facilities under the Chemical Facility Anti-Terrorism Standards (CFATS) program, 6 C.F.R. Part 27. CFATS was created pursuant to Section 550 of the Homeland Security Appropriations Act of 2007, and Congress reauthorized and amended the program in 2014 through the *Protecting and Securing Chemical Facilities from Terrorist Attack Act of 2014* (6 U.S.C. § 621, et seq). The program identifies and regulates high-risk chemical facilities to ensure security measures are in place to reduce the risk of the misappropriation or misuse of chemicals by an adversary.

### Colleges and Universities and CFATS

Facilities that are required to comply with the CFATS regulation fall into many categories, including colleges and universities. 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 chemicals of interest (COI) that are regularly used, stored, or made in:

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

While COI may have benign uses, such as medical research or facility maintenance, they also have the potential to be deliberately diverted, released, or otherwise misused by terrorists.

### Chemicals of Interest

Appendix A of the CFATS regulation lists more than 300 COI that, if held in specified quantities and concentrations, trigger initial reporting requirements under CFATS. These chemicals may pose significant risks to human life or health if stolen, released, or used in an act of sabotage by terrorists. COI are organized by security 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); sabotage or contaminate to release in transit or cause an explosion (Sabotage COI); release as an explosive or to form a flammable or toxic cloud (Release COI).

### Who is high-risk?

Facilities with COI at or above quantities and concentrations specified in the regulation must report their chemicals to DHS within 60 days through an online screening tool referred to as a Top-Screen. DHS conducts a risk-assessment utilizing the Top-Screen information to determine whether a facility is high-risk by evaluating potential consequences of an attack, the facility's inherent vulnerability, and threat factors. Facilities with COI below threshold quantities and/or concentrations are not required to report to DHS. In addition, facilities that use release COI in a laboratory under the supervision of a "technically qualified individual" need not be counted toward a facility's screening threshold quantity (STQ). For more information on this provision, please refer to § 27.203(b)(2) of the CFATS regulation, or call the CFATS Help Desk at 866-323-2957.

When preparing a Top-Screen, a chemical hygiene officer, environmental manager, risk manager, and other staff are valuable resources for providing information about COI on campus. Campus security personnel are also excellent resources throughout the CFATS compliance process.

Colleges and universities may choose to register each individual building or the entire campus depending on their resources and security posture. DHS is available for consultation in making this determination.

## Considerations Specific to Colleges and Universities

Upon receiving confirmation of its high-risk status, a facility must develop a Site Security Plan (SSP) that addresses 18 risk-based performance standards (RBPS). DHS works with facilities to select and implement security measures in their SSP that are appropriate to the facilities' circumstances and satisfy the RBPS.

DHS recognizes that colleges and universities are made up of many individual buildings, operations, and areas, only some of which may possess COI. If a college or university registers the entire campus as one facility, they may decide to implement appropriate security measures only at each building/location, the entire campus, or a combination thereof. DHS can assist colleges and universities to help them determine how to secure and monitor their buildings, operations, and areas.

## Enforcement

The CFATS regulation provides that if DHS believes a 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 \$33,333 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 **Chemical Security Assessment Tool (CSAT) Help Desk** provides timely support to chemical facility owners and operators. Please contact the CSAT Help Desk at 1-866-323-2957, or at [csat@dhs.gov](mailto:csat@dhs.gov).
- The **CFATS Knowledge Center** is an online repository of Frequently Asked Questions, articles, and documents relating to CFATS. Please visit the CFATS Knowledge Center at [csat-help.dhs.gov/](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. Please direct inquiries to [CFATS@hq.dhs.gov](mailto:CFATS@hq.dhs.gov).
- **CFATS Tip Line** provides for anonymous chemical facility security reporting. If you believe a facility is violating the CFATS regulations, contact the CFATS Tip Line at 1-877-394-4347 (1-877-FYI 4 DHS), or at [CFATSTips@hq.dhs.gov](mailto:CFATSTips@hq.dhs.gov).

## Additional References and Resources

- *Protecting and Securing Chemical Facilities from Terrorist Attack Act of 2014*  
[uscode.house.gov/view.xhtml?path=/prelim@title6/chapter1/subchapter16&edition=prelim](http://uscode.house.gov/view.xhtml?path=/prelim@title6/chapter1/subchapter16&edition=prelim)
- Risk-Based Performance Standards Guidance Document: [www.dhs.gov/publication/cfats-rbps-guidance](http://www.dhs.gov/publication/cfats-rbps-guidance)
- DHS Guidance for the Expedited Approval Program: [www.dhs.gov/cfats-expedited-approval-program](http://www.dhs.gov/cfats-expedited-approval-program)

## Contact Information

For more information, please visit [www.dhs.gov/chemicalsecurity](http://www.dhs.gov/chemicalsecurity) or email [CFATS@hq.dhs.gov](mailto:CFATS@hq.dhs.gov).