

CHEMICAL SECURITY SUMMIT

Preparing for a CFATS Inspection

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#ChemicalSecurity

CFATS Visits and Inspections

Compliance Assistance Visits

- Conducted at any stage of CFATS implementation to provide technical assistance

Authorization Inspections

- Conducted at a covered facility after a Letter of Authorization in order to verify that the contents listed in the facility's authorized Site Security Plan (SSP) or Alternative Security Program (ASP) are accurate and complete

Compliance Inspections:

- Conducted after a Letter of Approval to ensure both existing and planned security measures that are identified within the approved SSP or ASP continue to be implemented fully and on schedule



Authorization Inspection (AI) vs Compliance Inspection (CI)

AIs are conducted to:

- Ensure both existing and planned security measures that are identified within the Authorized SSP or ASP are accurate and complete
- Ensure that the equipment, processes, and procedures described in the SSP or ASP are appropriate and sufficient to meet the established performance standards
- Discuss other issues that have come up since the *Letter of Authorization*

CIs are conducted to:

- Ensure both existing and planned security measures that are identified within the approved SSP or ASP continue to be implemented fully and on schedule
- Ensure that the equipment, processes, and procedures described in the SSP or ASP are appropriate and sufficient to meet the established performance standards
- Ensure required corrective actions have been implemented and are sustainable
- Discuss other issues that have come up since the Letter of Approval

Before the Inspection...

- An inspector will reach out by phone and/or email to the designated site representative to schedule a date and time for the inspection
- The inspector will discuss the:
 - Purpose and scope of the visit
 - Expected duration and schedule of the inspection
 - Required facility personnel and resources/documents that should be available during the inspection
 - Chemical-terrorism Vulnerability Information (CVI) considerations
 - Personal protective equipment/safety requirements



Who Should Be There?

Not all personnel need to be present for the entirety of the inspection or available in person, but you should consider whether to include:

Submitter/Authorizer/Preparer

Facility Security Officer and/or Corporate Security Officer

Cybersecurity Officer

Human resources representative

Facility manager/facility security representative

Operations manager

Shipping and receiving representative

Emergency response representative



Prepare Documents

- Chemical inventory list
- Site/facility layout
- Security Standard Operating Procedures
- Crisis Management Plan (or equivalent)
- Cybersecurity policy and procedures
- Company hiring policy and procedures
- Shipping and receiving policy and procedures
- Training, drill, and exercise records
- Security system maintenance/calibration records
- Incidents and breaches of security documentation
- CFATS SSP/ASP annual audit documentation



Preparing for the Inspection

- Review your Top-Screen
 - Confirm the current quantities, concentrations, packaging, etc., of all chemicals of interest (COI)
- Review the SVA and SSP/ASP to:
 - Confirm all existing measures are in place and identify methods to demonstrate their effectiveness to the inspection team (e.g., observation, documentation, interview, and testing)
 - Identify all planned measures, ensure their completion on time, and identify methods to demonstrate their effectiveness to the inspection team
 - Identify any changes in the overall security posture of the facility



On-Site Inspection

- Security and/or safety briefings
- In-brief to discuss the purpose of the visit and planned schedule for the inspection
- During the inspection, there are four distinct methods of collecting information when evaluating a security measure:
 - Direct observation
 - Document review
 - Testing
 - Interviews



Prepare: Detection and Delay

- Intrusion Detection System (IDS) and Closed-Caption Television (CCTV):
 - Locations, type, and frequency of monitoring, activation, lighting, motion detection capabilities, asset coverage, alert response
- Process Controls
- Restricted Areas
- Screening



Prepare: Cyber

- Critical Cyber Components, Systems, and Equipment
- Policies: Password management, access control, firewall/system boundaries, etc.
- Network Architecture
- Patching/System Maintenance
- Reporting and Response Procedures
- Disaster Recovery and Business Continuity



Prepare: Response

- Outreach



Prepare: Security Management

- Inspection, Testing, Maintenance
- Records
- Audits
- Personnel Surety Program Submissions



Inspection Out-Brief

- During the out-brief, the inspection team will:
 - Provide a general overview of the inspection
 - Relay observations, findings, and potential concerns encountered
 - Present observations to clarify any misunderstandings and/or provide clarifying documentation
 - Discuss follow-up actions or next steps with the facility
- If necessary, the inspection team may leave the facility with a “leave behind” document which outlines the inspection findings and options for consideration in resolving issues





For more information:
cisa.gov/chemical-security
cisa.gov/cfats

For questions:
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