The ACC Alternate Security Program Guidance
for CFATS Covered Facilities

The U. S. Department of Homeland Security’s (DHS) Chemical Facility Anti-Terrorism Standards (CFATS) rule establishes a risk-based performance standards approach to screening and securing “high risk” chemical facilities. As provided in the final rule (6 CFR part 27), CFATS allows chemical facilities to submit an Alternate Security Program (ASP) in lieu of a Site Security Plan. The Assistant Secretary for Infrastructure Protection may approve an ASP submitted by a covered facility upon determination that the ASP meets the requirements of the CFATS rule and provides for an equivalent level of security.

A Valuable CFATS Implementation and Compliance Management Tool

What is ACC’s Alternate Security Program Guidance?

Under the Chemical Facility Anti-Terrorism Standards (CFATS) – the nation’s primary chemical security regulatory program – facilities possessing Chemicals of Interest (COI) at or above established thresholds may be deemed “high risk” by the U.S. Department of Homeland Security (DHS). These facilities must complete a Security Vulnerability Assessment (SVA), a screening program that allows DHS to more precisely evaluate site security and risk. If DHS determines a facility to be high risk, that facility must submit a Site Security Plan (SSP) outlining existing and planned measures to minimize the risk of a terrorist attack or other security threat. ACC’s Alternate Security Program (ASP) offers an alternate approach, applicable to a wide range of covered facilities, to fulfill this SSP requirement.

Why create an alternative tool for submitting a Site Security Plan?

The current DHS process for completing and submitting a Site Security Plan has proven to be overly complicated and cumbersome, making it difficult for DHS to analyze and approve plans for compliance. Additionally the end result of the SSP process does not generate an operational security plan, and does not paint a clear picture of what is actually being done on site to enhance security. As such, the current SSP format makes it difficult for DHS inspectors to determine compliance during a facility audit.

What is provided in the ACC ASP Guidance?

The ASP Guidance provides background on the ASP process and guidance on the type of information and level of detail required to describe how a covered site complies with each of the 18 Risk-Based Performance Standards. It also provides a standardized format or template that can be filled out and submitted as the site’s formal ASP submission to DHS.
In addition, the end product provides a useful tool for site security management and for DHS inspectors during the conduct of an audit.

**What does the ACC Alternate Security Program (ASP) Guidance mean to ACC member companies and Responsible Care Partners?**

The development of the ACC ASP Guidance provides ACC members and Responsible Care Partner companies that are covered by the DHS CFATS regulations a compliance alternative to the Site Security Plan (SSP) provided by DHS in the suite of tools available under the Chemical Security Analysis Tool (CSAT).

The benefits of the ACC ASP include a more streamlined approach for compliance that provides DHS analysts the detailed information they need regarding security measures implemented at a covered site and the end product provides a useful tool for company and DHS inspectors to audit a facility for compliance. For more information on the ACC ASP: