Mr. Cal Dooley
President and CEO
American Chemistry Council
700 2nd Street, N. E.
Washington, D.C. 20002

Dear Mr. Dooley:

On behalf of the Infrastructure Security Compliance Division (ISCD), I would like to personally acknowledge the work that you and the members of the American Chemistry Council (ACC) have done in support of the Chemical Facility Anti-Terrorism Standards (CFATS). Thank you especially for ACC’s efforts to help high-risk chemical facilities meet the CFATS requirements through the development of the ACC Alternative Security Program (ASP) Guidelines and Template. We commend your decision to make these documents available to all facilities regulated under CFATS for potential consideration and reference in the development of other ASPs.

Since your organization approached DHS to discuss creating ACC guidance to assist ACC members that choose to submit ASPs for high-risk facilities in lieu of Site Security Plans, great progress has been made in the implementation of the CFATS program. DHS has streamlined the process for authorizing and approving facility security plans, including ASPs, and we have set a goal of 400 approvals by the end of 2013. As ISCD moves to significantly heighten the pace of authorizations, inspections, and final approvals of security plans, ASPs will undoubtedly be an important part of the CFATS program’s continued forward progress.

I appreciate the constructive communication ACC has had with the Department throughout the drafting and review stages of the ACC template and through field testing the pilot tool at multiple facilities. Through this process, we have learned a great deal about the ways in which the Department can interact constructively with the regulated community in support of the DHS mission.

Again, many thanks to you and your team for your efforts in developing the ACC ASP Guidelines and Template. We look forward to continuing to enhance the implementation of the CFATS program by working with you and other members of the regulated community on projects like these.

Sincerely,

David Wulf
Director
Infrastructure Security Compliance Division
Department of Homeland Security