IT Program Assessment
NPPD- Infrastructure Security Compliance Program (ISCP)-
Chemical Security Assessment Tool (CSAT)

Review

The DHS Chief Information Officer (CIO) conducted a comprehensive review of the NPPD- Infrastructure Security Compliance Program (ISCP) - Chemical Security Assessment Tool (CSAT) on June 11, 2010. The CSAT program is a regulatory program mandated by Congress. As part of the DHS Appropriations Act of 2007, specifically regarding the Chemical Facility Anti-terrorism Standards (CFATS), "high risk" chemical facilities are required to perform vulnerability assessments, develop site security plans, and implement security measures that meet DHS-defined Risk-Based Performance Standards (RBPS). The CSAT program provides capabilities for electronic processing of: User Registration, Consequence Based Screening, Site Vulnerability Assessments, Site Security Plan Submission, and Personnel Surety Screening of the potential "high risk" facilities tied to any of the 300+ Chemicals of Interest (COI). CSAT also fulfills an outcome supporting the Presidents Management Agenda for E-Gov. The CSAT module fills the gap in non-existent capabilities, providing a robust data capture and analysis capability while minimizing the number of dedicated federal employees that would be required for a traditional paper-based regulatory data submission environment.

Findings during the review are as follows:
- The program is currently in a mixed lifecycle phase, predominantly in Operations and Maintenance with development work to be conducted on a personal surety capability.
- The program management office (PMO) is somewhat confident that they have identified all high risk facilities nationwide (over 5,300 facilities). Due to facility self-declaration, it is difficult to say with certainty that all high risk facilities are accounted for.
- The PMO assigns a risk level (1-5) based on various criteria factors.
- The PMO is leveraging existing technology (i.e. platform is Linked Encrypted Network System [LENS]).

Assessment

The ISCP-CSAT is a mature, operationally well-managed program providing critical value to the Department and the public alike. The program will continue to identify any and all additional chemical facilities deemed "at risk," and monitor accordingly. Initial concern regarding classified information transferring from high risk environments to low risk environments was proven to be unfounded as factual information proved that manual, not automated, processes are in place to ensure security.

Score: 4