

## Close-up on the Personnel Surety Program (PSP)

Preventing terrorist access to high-risk chemical facilities and their critical assets is at the core of CFATS. On July 9, 2019, CISA began the full implementation of the CFATS Personnel Surety Program (PSP) by expanding the PSP to include Tier 3 and 4 facilities—which make up more than 90 percent of the CFATS population.

Screening individuals for terrorist ties is a key aspect of chemical facility security that reduces the likelihood of individuals that may be an insider threat from stealing, damaging, or disrupting critical assets which may result in a significant adverse impact to human life, national security, or the economy. The PSP implementation

requires all CFATS-covered facilities to include measures to satisfy Risk-Based Performance Standard 12(iv)—screening for terrorist ties—in their Site Security Plan (SSP) or Alternative Security Program (ASP).

Industry feedback and lessons learned from Tier 1 and 2 facilities, which have been implementing PSP since 2015, were incorporated into the plan to expand to facilities that haven't accounted for RBPS 12(iv). CISA is rolling out the PSP in phased manner until all tiered facilities have been notified.

Below are tips and best practices based on PSP submissions and feedback we received that may help your facility.



### PSP Frequently Asked Questions

#### I received an implementation notice, now what?

The implementation notice includes guidance on how to update your SSP/ASP, the four options your facility can choose from to comply with RBPS 12(iv), and resources (e.g., Sample PSP Supplement).

Each facility has **30 days** from the date of notification to update and submit its SSP/ASP through the Chemical Security Assessment Tool (CSAT) portal. When you log into CSAT, questions on RBPS 12(iv) will appear in your facility's SSP.

You can select one, or a combination, of the four options to comply with RBPS 12(iv): Option 1 - Direct Vetting, Option 2 - Use of Vetting Conducted under Other DHS Programs, Option 3 - Electronic Verification of Transportation Worker Identification Card (TWIC), and Option 4 - Visual Verification.

Options 1 and 2 allow facilities to submit information about Affected Individuals directly through the CSAT for vetting.

*Note: Your facility can propose an option not listed above in its SSP. Provide as much detail as possible to allow CISA to evaluate whether or not the proposed option meets the RBPS 12(iv) standard. CISA will review proposed options on a case-by-case basis.*

#### Who is an “Affected Individual”?

Affected Individuals are your facility personnel (e.g., employees or contractors) and unescorted visitors who have or are seeking access to restricted areas or critical assets.

## When do you start implementing PSP at your facility?

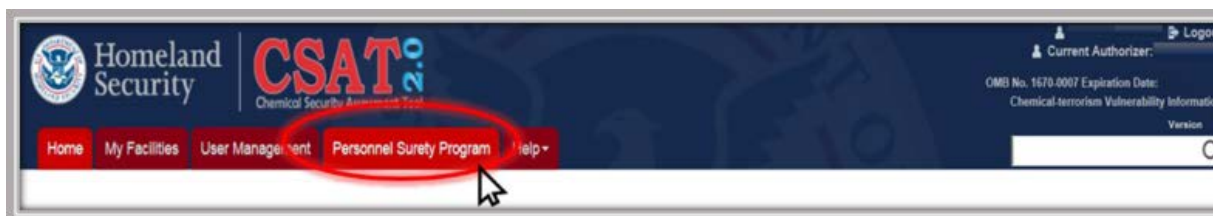
CISA will assess your facility's updated SSP/ASP to determine if the security measures satisfy RBPS 12(iv). Once approved, your facility will receive an Approval Letter **and** the PSP Tab that houses the PSP Application in CSAT will become available. The PSP Application is where facilities that chose Option 1 or Option 2 submit names of all Affected Individuals. Facilities have **60 days** from the approval date (unless otherwise noted) to submit names of all Affected Individuals.



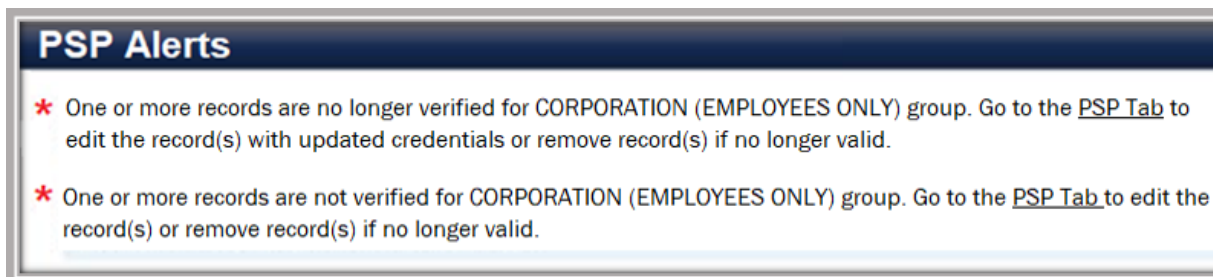
## Navigating CSAT and the PSP Application Tips

### Why can't I see the PSP Tab in CSAT?

The PSP Tab will only appear in the CSAT top header to the Authorizer after the facility has an approved SSP/ASP that addresses PSP measures. Once available, the Authorizer can then choose to grant access to the PSP Tab (**see image below**) to other users, such as the Submitter or an Administrator.



*Note: On the CSAT homepage, users with PSP access will see a **PSP Alerts** box (see image below) that will display alerts associated with Affected Individual records and what action needs to be taken for that record. The message "No active PSP alerts" will be displayed if there is no action.*



### Can my contracting company have a PSP Submitter account?

Yes. The types of users that may be assigned a PSP Submitter role include a facility employee, an employee or contractor of a corporation that is an owner or operator of the facility, or a third-party contractor or service provider performing work on behalf of the facility. A facility can add users in the User Management Tab within CSAT.

### Can my facility have more than one PSP Submitter?

Yes. An Authorizer or Administrator may create and manage affected individuals' records into "groups" to efficiently view and/or edit records, and to give PSP Submitters access to only edit those records within their assigned group. For example, a PSP Submitter who is from the facility's contracting company may be assigned access to a group with individual records from his/her company.

*Note: PSP Submitter may only be assigned to one group under an Authorizer.*

## How and when do I submit new employees under Option 1 and Option 2?

After the initial submission and implementation of the PSP at the facility, any new employee that is an Affected Individual must be submitted for vetting before he/she is granted access to restricted areas or critical assets.

## Do I have to remove an employee's name who no longer works at my facility, or is no longer accessing a critical asset?

This depends on what is stated in your approved SSP/ASP. If it states that your facility *will* notify DHS when an employee no longer has access to restricted areas or critical assets, then you will have to remove the employee's record from your Affected Individuals list within the PSP Tab.

It's a best practice to remove names of offboarded employees to keep your Affected Individuals list up-to-date. This also helps Chemical Security Inspectors during a CFATS Compliance Inspection to efficiently review your records.

## Can I do a bulk upload of records?

Yes, you can conduct a bulk upload of records by using a spreadsheet document (**see image below**). The Bulk Upload capability processes up to 10,000 records at a time. Bulk Upload files can be input in either an XLS or XLSX file. View the [Sample PSP Bulk Upload](#) resource or page 103 of the [CSAT Portal User Manual](#) for assistance.

*Tip: The PSP Application does not allow you to directly conduct a bulk removal of specific records using the spreadsheet. However, if you have a large amount of records to update and have your new spreadsheet ready, you could choose to delete all your records, and then immediately do a bulk upload of your newly updated spreadsheet.*

The image shows a spreadsheet template for bulk uploading records. The columns are labeled A through N. The rows are numbered 1 through 6. Annotations on the left and right sides explain the structure:

- 1<sup>st</sup> and 2<sup>nd</sup> Row show Main Category Title**: Points to row 1, which contains 'Full Name of Affected Individual' (col A-D), 'Date & Place of Birth of Affected Individual' (col E-I), and 'Physical Description' (col J-N).
- 3<sup>rd</sup> Row shows Field Name**: Points to row 2, which contains 'Last Name' (col A), 'First Name' (col B), 'Middle Name' (col C), 'Suffix' (col D), 'Date of Birth' (col E), 'City' (col F), 'County' (col G), 'State' (col H), 'Country' (col I), and 'Gender' (col J).
- 4<sup>th</sup> Row shows Required and Optional fields for PSP Options**: Points to row 3, which contains 'Required' (col A), 'Required' (col B), 'Optional' (col C), 'Optional' (col D), 'Required' (col E), 'Optional' (col F), 'Optional' (col G), 'Optional' (col H), 'Optional' (col I), and 'Gender or Citizenship Required for Opt 1 & Revert to Opt 1' (col J).
- 5<sup>th</sup> Row shows Format Requirement**: Points to row 4, which contains 'text' (col A), 'text' (col B), 'text' (col C), 'text' (col D), 'mm/dd/yyyy' (col E), 'text' (col F), 'text' (col G), '2 characters' (col H), '3 characters' (col I), and 'F or M' (col J).
- Record data example**: Points to row 5, which contains 'Doe' (col A), 'John' (col B), 'NMN' (col C), '01/01/1912' (col E), 'Brooklyn' (col F), 'HI' (col H), 'USA' (col I), and 'M' (col J).

Full Name of Affected Individual				Date & Place of Birth of Affected Individual				Physical Description			
Last Name	First Name	Middle Name	Suffix	Date of Birth	City	County	State	Country	Gender		
Required	Required	Optional	Optional	Required	Optional	Optional	Optional	Optional	Gender or Citizenship Required for Opt 1 & Revert to Opt 1		
text	text	text	text	mm/dd/yyyy	text	text	2 characters	3 characters	F or M		
Doe	John	NMN		01/01/1912	Brooklyn		HI	USA	M		

## Under Option 1 or Option 2, how long do I have to wait after submitting an individual's name to grant him/her access? Do I have to wait for the status to change?

Once you submit names, affected individuals can have access right away to the facility's restricted areas and critical assets.









*Note: Under Option 1, the status of a record will remain as "Submitted". Under Option 2, the status of a record changes depending on where it is in the verification enrollment process: Verification Pending, Verified, Not Verified, No Longer Verified (see image below).*

Home My Facilities User Management **Personnel Surety Program** Help

### Affected Individuals

Display 15 Add Individual Bulk Upload

row(s) - 8 - 6 of 6

Select	View/Edit	Last Name	First Name	Gender	Birth Year	Group	Option	Status	Submitted by	Submission Date
<input type="checkbox"/>	 	Doe	Jane	Female	1925	Corporation	Option 1	Submitted	User2.test	08/24/2017
<input type="checkbox"/>	 	Doe	Joe		1961	Corporation	Option 2	Verification Pending	User1.test	12/12/2016
<input type="checkbox"/>	 	Smith	John	Male	1960	Corporation	Option 1	Submitted	User2.test	12/12/2016
<input type="checkbox"/>	 	Smith	Jane		1962	Corporation	Option 2	Not Verified	User1.test	12/12/2016

row(s) - 8 - 6 of 6

Remove Individual(s) Export to PDF



## PSP Assistance and Resources

The [PSP Demonstration Webinar](#) is a video that provides step-by-step guidance on how to navigate the CSAT PSP Application in the CSAT portal.

The [PSP Toolkit](#) contains resources that facilities can use when updating their security plans. Resources include:

- [CSAT 2.0 Personnel Surety Program Instructions](#)
- [RBPS 12\(iv\) – Screening for Terrorist Ties Fact Sheet](#)
- [Personnel Surety Program Sample Supplement](#)
- [PSP Sample Bulk Upload](#)
- [PSP Sample Privacy Notices](#)
- [PSP Demonstration Webinar \(video\)](#)

The [CSAT 2.0 Portal User Manual](#) provides the instructions on how to register for CSAT, navigate the CSAT 2.0 Portal, and specific instructions on the PSP Tab.

[Chemical Security Inspectors and Compliance Analysts](#) are available to work on-site or via phone to assist facilities in updating their SSP/ASP, and once the revised security plan is approved, to assist facilities with the CSAT PSP Application. Email [CSAT@hq.dhs.gov](mailto:CSAT@hq.dhs.gov).