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1. Overview

This document provides instructions to facilities for editing and resubmitting their submitted Site Security Plan (SSP) through the Chemical Security Assessment Tool (CSAT). The instructions explain how to edit an SSP, either through an administrative edit or a technical edit. **NOTE:** These instructions apply only to the CSAT SSP Edit process.

All examples provided in this document are illustrative and are merely intended to highlight specific points within the CSAT SSP. Each facility must carefully consider its own unique characteristics and circumstances to determine the relevance and appropriateness of each example.

1.1 Background

Section 550 of the Department of Homeland Security (DHS) Appropriations Act of 2007, Pub. L. 109-295, authorizes DHS to regulate the security of high-risk chemical facilities. The CFATS Interim Final Rule (IFR), 6 CFR Part 27, was published on April 9, 2007, to implement the Act. See 72 FR 17688. In addition, DHS published a final Appendix A to CFATS on November 20, 2007. See 72 FR 65396. As provided by 6 CFR §27.225 of the CFATS rule, covered (i.e., high-risk) facilities are required to submit for DHS approval SSPs that address the facilities’ vulnerabilities and satisfy the CFATS risk-based performance standards.

1.2 SSP Edit Process

The SSP Edit process allows a facility to retrieve its most recently submitted SSP so that it can be edited and resubmitted to DHS. The edit to the SSP can be an administrative edit or a technical edit.

- An administrative edit involves making changes to information pertaining to your facility’s description, contact information, local police, fire and Emergency Management Team (EMT) jurisdiction information, and employee and workshift information. Please see Section 3 and Appendix B for more information. There is no limit to the number of times that the CSAT SSP Edit function can be used by a covered facility to make administrative edits to its SSP.
  - A technical edit involves making changes to information pertaining to your facility’s operations, security measures, and other areas which are not considered an administrative edit. Please see Section 4 for more information. **NOTE:** The CSAT SSP Edit function is only available for use by a covered facility to make technical edits once every 90 days after the final approval by DHS of the SSP.

A facility’s Submitter can request an SSP Edit. Once it is retrieved by CSAT, the SSP can be opened and edited by either the Submitter or Preparer. All appropriate data fields in the SSP can be edited (depending on the edit type requested), except for geospatial
information (latitude and longitude). Geospatial information can only be changed through the CSAT Help Desk.

**NOTE:** A facility’s process of editing a previously submitted SSP will not affect any applicable deadlines under the CFATS regulations unless DHS notifies the facility to the contrary. In particular, for the purposes of Top-Screen resubmissions under 6 CFR § 27.210(b)(1) of CFATS, submission of such changes will not affect the original SSP approval date(s) and Top-Screen resubmission dates.

### 1.3 SSP Edit Roles

The table below describes one of three possible roles that users assume when utilizing the CSAT system for SSP Edits.

<table>
<thead>
<tr>
<th>CSAT User Role</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reviewer</td>
<td>A user who has read-only privileges to see a survey. This user will not have the ability to edit a survey, but will be able to see the existence of an edited survey and review all versions of the survey.</td>
</tr>
<tr>
<td>Preparer</td>
<td>A user who has the ability to provide input to a survey. This user will not have the ability to initiate the edit to a survey, but will be able to provide input to a survey once the survey is opened for modification.</td>
</tr>
<tr>
<td>Submitter</td>
<td>A user who reviews and submits the finalized survey. Once submitted, the document becomes available for government review and inspection. This user will have the ability to initiate an edit to an existing survey.</td>
</tr>
</tbody>
</table>
2. Getting Started

2.1 Requesting SSP Edits

When you first log in to the CSAT portal, you will see the **CSAT Survey List** screen (see Picture 2.1).

On your facility’s list of completed surveys, you will see two buttons on the row which lists your facility’s most recently submitted SSP: the [Request Administrative Changes] button and the [Request Technical Changes] button. **NOTE:** If you have more than one SSP on your list of completed surveys, you can only edit the latest submission.

- If you want to perform an administrative edit, click the [Request Administrative Changes] button and refer to Section 3 of this document for more instructions.
- If you want to perform a technical edit, click the [Request Technical Changes] button and refer to Section 4 of this document for more instructions.
- **NOTE:** If your facility only needs to update its facility data (e.g., facility name or address, owner, operator), you may use the [Update Facility Info] button on the **CSAT Survey List** screen instead of using the CSAT SSP Edit process.

![Picture 2.1: CSAT Survey List Screen](image-url)
3. Administrative Edits

3.1 Administrative Edit Disclaimer

After you select the [Request Administrative Changes] button on the CSAT Survey List screen, the disclaimer as seen in Picture 3.1 will appear. Please carefully review the disclaimer before proceeding.

![Message from webpage]

Picture 3.1: Administrative Edit Disclaimer Message

- If you choose to continue the administrative edit process, click [OK].
- If you decide to discontinue the administrative edit process, click [Cancel]. You will be returned to the CSAT Survey List screen.

3.2 Reviewing Editable Questions

After you select the [OK] button, the screen will display the list of questions that you will be permitted to edit as part of the administrative edit (see Picture 3.2). See Appendix B for the complete list of administrative edit questions.
After you review the list, click the [Continue] button at the bottom of the screen to submit your administrative edit request for processing.

If you decide to discontinue the administrative edit process upon review of the question list, click [Cancel]. You will be returned to the CSAT Survey List screen.

After you click the [OK] button, you will be returned to the CSAT Survey List screen. You will notice on the survey list that your SSP will have the "Pending Data Retrieval" message in the far right column (see Picture 3.3). This status will remain on the list until the SSP is loaded for administrative edit.
3.3 Making Administrative Edits

You will receive a notification from CSAT via e-mail when your SSP is ready for administrative editing. When you next log in to CSAT, your editable SSP will appear on the **CSAT Survey List** screen with an [Input Administrative Changes] button on the far right column (see Picture 3.4). To continue with the administrative edit, click the [Input Administrative Changes] button.

![Picture 3.4: CSAT Survey List Screen with Input Administrative Changes Button](image)

After you click the [Input Administrative Changes] button, you will begin the administrative edit of your SSP, beginning with the opening **General** screen (see Picture 3.5).

![Picture 3.5: SSP General Screen](image)

When making the administrative edit, you will answer questions within the **General** and **Facility Operation** sections of the SSP. See the CSAT SSP User Guide for more information.

- Use the [Back], [Save] and [Next] buttons on each screen to move through the SSP and to save your work as you make your edits.
• You can also use the navigation menu on the left side of the screen to move through the SSP (see Picture 3.6).

![Picture 3.6: SSP Navigation Menu]

### 3.4 Submitting Administrative Edits

When you finish making your administrative edits, you will see the **SSP Completion** screen (see Picture 3.7).

![Picture 3.7: SSP Completion Screen]

After you click the [Next] button on the **SSP Completion** screen, you will see the **SSP Finish** screen (see Picture 3.8). This screen will prompt you to both validate the
information you entered and review it for completeness and accuracy before final submission. Click the [Final Validation] button to begin the validation process for your edited SSP.

![Finish](image)

**Picture 3.8: SSP Finish Screen**

The **SSP Finish** screen also requires you to provide a **Yes** or **No** answer to the question, “Do you want a copy of the letter acknowledging receipt of the SSP to be sent to the Preparer in addition to the Submitter?” If you choose **Yes**, the Preparer will be notified via e-mail that the edited SSP has been transmitted to the Submitter for review.

When the validation process is finished and no errors are found, a screen similar to the one shown in Picture 3.9 will appear. Click the [Continue] button to complete the submission of your edited SSP. **NOTE:** If you leave your SSP administrative edit process **without** submitting a complete edit, CSAT will **not** accept your changes as a new SSP submission.

![No errors were found.](image)

**Picture 3.9: SSP Validation Results Screen**

After you submit your SSP administrative edit, you will see a disclaimer which reminds you that your current SSP is still in effect while your edits are being reviewed. After your
edits are reviewed, you will receive a letter or e-mail that acknowledges the acceptance of the changes to your SSP. **NOTE:** Even after your changes are accepted, your original SSP approval dates and resubmission deadlines will **not** change.
4. Technical Edits

4.1 Technical Edit Disclaimer

After you select the [Request Technical Changes] button, the following disclaimer will appear:

![Technical Edit Disclaimer Message]

Message from webpage

Thank you for your request to update the substantive/technical information in your facility's SSP. While your request to make changes is pending, any currently authorized or approved SSP will remain in effect and the technical/substantive changes you propose to make to the facility's SSP should not be implemented. At this time, the CSAT SSP edit function is only available for use by a facility to make technical/substantive changes once very 90 days after final approval of the SSP. If your request is within this limit, the facility will receive an email from DHS confirming that the SSP edit function is open and available for use. Please note that the mere submission of technical/substantive changes to the SSP using the CSAT edit function does not necessarily mean that such changes will be approved by DHS as part of the SSP under 6 CFR § 27.245 of the Chemical Facility Anti-Terrorism Standards (CFATS) regulations. In addition, the submission of such changes does not affect any applicable deadlines under the CFATS regulations unless DHS notifies the facility to the contrary. For the purposes of Top-Screen Resubmissions under 6 CFR §§ 27.210(b)(1) of CFATS, submission of such changes will not affect the original SSP approval date(s) and Top-Screen resubmission deadlines.

Picture 4.1: Technical Edit Disclaimer Message

Please carefully review the disclaimer before proceeding.

- If you choose to continue the technical edit process, click [OK].
- If you decide to discontinue the technical edit process, click [Cancel]. You will be returned to the CSAT Survey List screen.
4.2 Technical Edit Details

After you click [OK], the screen will display another disclaimer which provides additional details about the technical edit process (see Picture 4.2).

- If you decide to continue the technical edit process after reviewing the details provided, click the [Request SSP Edit] button.

- If you decide to discontinue the technical edit process after reviewing the details provided, click [Cancel]. You will be returned to the CSAT Survey List screen.

- **NOTE:** If you click the [Request SSP Edit] button and your facility is *not* within the time period for making technical edits (as described in Section 1.2), an error message will appear (see Picture 4.3). It will inform you as to when your SSP will be available in CSAT so your facility can request a technical edit at that time. Click the [Continue] button to return to the CSAT Survey List screen.
After you click the [Request SSP Edit] button—and if you do not receive an error message—you will be returned to the CSAT Survey List screen. You will notice on the survey list that your SSP will have the “Pending Data Retrieval” message in the far right column (see Picture 4.4). This status will remain on the list until the SSP is loaded for technical edit.

![Picture 4.4: CSAT Survey List Screen with Pending SSP Status](image)

You will receive an e-mail that notifies you that your SSP is available for technical editing. When you next log in to CSAT, your CSAT Survey List screen will change so that a new row is added to the survey list with an SSP that has the word New listed in the Status column and an [Input Technical Changes] button in the far right column (see Picture 4.5).

![Picture 4.5: CSAT Survey List Screen with SSP Ready for Technical Edit](image)

### 4.3 Making Technical Edits

When you click the SSP [Edit/Review] button on the CSAT Survey List screen (see Picture 4.5), you will see your editable SSP populated with values from your previously submitted SSP. You will be able to complete the survey by editing the answers you would like to change and resubmitting the SSP when you are finished. Please see the CSAT SSP User Guide for more details on completing your SSP survey. **NOTE:** Existing authorized or approved SSPs will remain in effect as authorized or accepted by DHS until the resubmitted SSP is authorized or accepted.

After you submit your SSP technical edit, you will see a disclaimer which reminds you that your current SSP is still in effect while your edits are being reviewed. After your edits are reviewed, you will receive a letter or e-mail that acknowledges the acceptance of the changes to your SSP. **NOTE:** Changes made to the SSP may not be implemented or
considered authorized or approved by DHS unless DHS sends notice of authorization or approval of those changes via a letter. Even after your changes are accepted, your original SSP approval date (if applicable) and Top Screen resubmission deadlines will not change.
## Appendix A: Acronym Reference List

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>CFATS</td>
<td>Chemical Facility Anti-Terrorism Standards</td>
</tr>
<tr>
<td>CHEMS</td>
<td>Chemical Security Management System</td>
</tr>
<tr>
<td>CSAT</td>
<td>Chemical Security Assessment Tool</td>
</tr>
<tr>
<td>DHS</td>
<td>U.S. Department of Homeland Security</td>
</tr>
<tr>
<td>EMT</td>
<td>Emergency Management Team</td>
</tr>
<tr>
<td>IFR</td>
<td>Interim Final Rule</td>
</tr>
<tr>
<td>MAG</td>
<td>Mutual Assistance Group</td>
</tr>
<tr>
<td>SSP</td>
<td>Site Security Plan</td>
</tr>
</tbody>
</table>
Appendix B: Limited Fields for Administrative SSP Edits

- Facility Description:
  - What is the facility type? [Q:3.0-13871]
  - If “Other” selected, enter a description. [Q:3.0-14051]
- OEM Authority:
  - What is the Office of Emergency Management (OEM) authority? [Q3.0-13934]
  - If “Other” selected, enter a description. [Q3.0-14052]
  - Enter the name of the local jurisdiction. [Q3.0-13935]
  - What is the locale setting of the facility? [Q3.0-13936]
  - If “Other” selected, enter a description. [Q3.0-13937]
- Facility Contact Information:
  - Name of the facility security officer. [Q3.1-13939]
  - Phone number of the security officer. [Q3.1-13940]
  - Name of the assistant facility security officer. [Q3.1-13941]
  - Phone number of the assistant security officer. [Q3.1-13942]
  - Name of the corporate security officer. [Q3.1-13943]
  - Phone number of the corporate security officer. [Q3.1-13944]
  - Name of the cyber security officer. [Q3.1-13945]
  - Phone number of the cyber security officer. [Q3.1-13946]
- Name of Local Police Jurisdiction. [Q4.0-13949]
- Phone Number of Local Police Jurisdiction. [Q4.0-13950]
- Date of Tactical Response Test. [Q4.0-13961]
- Name of local fire jurisdiction. [Q4.1-13968]
- Phone number of local fire department. [Q4.1-13969]
- Date of Fire Response Test. [Q4.1-13978]
- Name of EMT jurisdiction. [Q4.2-13979]
- Phone number of local EMT [Q4.2-13980]
- Date of Fire Response Test. [Q4.2-13989]
- List of all MAGs. [Q4.3-17712]
  - Short description of the local mutual assistance group. [Q4.31-13990]
  - Phone number of local MAG. [Q4.31-13991]
- How many groups/facilities are included in the MAG? [Q4.31-18839]
- Number of MAG member companies. [Q4.31-13994]
- Time for capsule response to reach facility (average). [Q4.31-13999]
- Does the facility conduct drills or exercises to include the MAG? [Q4.31-18840]
- Minimum time needed for MAG to begin on-scene response. [Q4.31-14000]
- Was the response time tested? [Q4.31-14001]
- Date of response test. [Q4.31-14002]

- Number of employees:
  - What number are full-time? [Q4.6-14076]
  - What number are part-time? [Q4.6-14077]
  - What number typically are contractors? [Q4.6-14078]
  - What number are other types? [Q4.6-14079]

- Workshift name [Q4.8-18510] and for each day of the week:
  - Starting time. [Q4.81-18512, Q4.81-18513]
  - Ending time. [Q4.81-18514, Q4.81-18515]
  - Number of employees. [Q4.81-18516]