

December 19<sup>th</sup>, 2017

## SECURITY PLAN

**1. PURPOSE:** The Research Service Security Plan is designed to ensure that access to RAJVAMC research laboratories is restricted to trained, authorized personnel and to visitors escorted by authorized personnel. The Security Plan establishes procedures for reporting incidents, alarm activations, and security breaches. The Security Plan includes established standard operating procedures for research laboratories within the Strom Thurmond Research Building (STRB) and Mental Health Research Building (MHRB) and RHJVAMC policies, including applicable Engineering Service policies regarding radiation safety and security. The Security Plan establishes procedures which are compliant with Title 42 Code of Federal Regulations (CFR) Parts 72&73, 42 CFR Part 1003, 7 CFR Part 331 and 9 CFR Part 121.

**2. POLICY:** Administer a program that applies current knowledge and feasible practices to ensure the protection of all patients, visitors and staff from exposures to hazardous or potentially hazardous chemical, radiological, and biological agents. Establish security procedures to prevent theft or misuse of hazardous agents, equipment, or research records used in RHJVAMC research laboratories or offices. Routinely evaluate the effectiveness of security measures. Collect and report data on incidents of security breaches to identify areas for improvement. It is required that all VA research investigators and staff, regardless of appointment status (compensated, WOC, or fee basis), will comply with all provisions of this policy.

**3. RESPONSIBILITIES:** The Associate Chief of Staff for Research and Development, the R&D Committee, and individual members of the RHJVAMC Research Service are responsible for the implementation of this policy.

### 4. ACTION:

**a. Physical Security:** The Research Service of the RHJVAMC maintains laboratory space in the Strom Thurmond Research Building (STRB), leased from the Academic Affiliate, the Medical University of South Carolina, and the Mental Health Research Building (MHRB) at the main VA medical center. Both facilities are controlled by a state of the art Access Security System. The system is continuously active (24 hours per day, 7 days per week) and is backed up by emergency power. It is continuously monitored, including nights, weekends, and holidays by MUSC Public Safety (STRB) and the VA Police Service (MHRB).

### b. Access Control:

(1) All individuals involved in RHJVAMC research must have either a VA salaried appointment or a WOC appointment authorizing them to work within the facility.

(i) Human Resources Management Service will fingerprint, initiate background investigations, issue approval memo, and provide identification card.

(ii) Staff have their identification card programmed to allow and to track access to and from the laboratory areas.

(iii) Identification cards must be worn and clearly visible at all times while within the RHJVAMC.

(iv) When research laboratory staff terminate their employment, they are required to return their RHJVAMC ID badge to the Research Service. The badge privileges are then deleted from the electronic access system.

(v) If a badge is lost or stolen or if a former employee fails to return a badge, the badge privileges are deactivated in the electronic access system. The ACOS/R&D, or designee, is notified and an incident report is filed with the Police Service.

(2) All visitors must be escorted into and through the laboratory areas by authorized RHJVAMC personnel. Visitors are expected to follow all RHJVAMC safety and security policies at all times.

(3) Access privileges for all personnel are reviewed at least annually by the R&D committee.

(4) Laboratories will be locked at all times when unattended, and access to individual laboratory space will be restricted to required personnel.

(5) External doors of each laboratory will be posted with names and contact numbers for the Principal Investigator and personnel to contact in the event of an emergency.

#### **c. Background and Security Clearances:**

(1) All staff, regardless of appointment status (compensated, WOC, or fee basis), are required to complete the appropriate forms to initiate a background check before access is granted to any of the secure areas.

#### **d. Inventory Control:**

(1) The RHJVAMC has never and does not currently utilize Select Agent materials.

(2) A chemical inventory for each laboratory is supplied by the Principal Investigator prior to approval by the SRS and R&D committee. Annual review of chemical inventories are performed by the SRS committee.

(3) Records of biological agents (BSL-1, BSL-2) utilized by each laboratory are maintained by the Principal Investigator. Biological agents are stored in locked, restricted access laboratories controlled by the Research Service.

(4) All hazardous material is disposed of as regulated biomedical waste by incineration.

(5) When agents are utilized, radioactive material inventory is maintained by the Principal Investigator in accordance with VAMC, local, and Federal regulations.

#### **e. Access for Maintenance:**

(1) Engineering and Environmental Management Services staff who routinely require access to the laboratories of the Research Service are issued privileges that allow access.

(2) When major maintenance or repairs are necessary, outside contractors must register with the Research Service office and be escorted to work sites by authorized personnel. Service engineers must wear the proper personnel protection equipment (PPE) as indicated per laboratory.

(3) All other visitors, i.e. scientists, recruits, donors, to the BSL-2 areas must follow the procedures in e.(2) above.

(4) VA Police, VA Engineering Staff, and MUSC Public Safety are trained in proper procedures for working within BSL-2 space if an emergency should occur.

#### **f. Cyber Security:**

(1) Access to the RHJVAMC computer network is granted to staff who are paid VA employees as well as WOC staff who require it.

(2) Access to the Patient Records is only granted to compensated, WOC, or fee basis staff working on approved R&D projects.

(3) Research staff must comply with procedures outlines in VHA Handbook 1200.12: Use of Data and Data Repositories in VHA Research.

**g. Education & Training:**

(1) Environmental Management Services staff, Engineering Service staff, or other RHJVAMC staff who enter the research laboratory area for routine maintenance and work orders receive annual security and safety trainings as well as instructions from laboratory staff.

(2) All laboratory staff receive orientation to the security measures in the research laboratory areas, required annual RHJVAMC trainings, and job-specific training.

(3) Safety and security training for laboratory staff includes instruction on response to alarms, intruders, suspicious packages, theft or loss of access key cards; theft, loss or release of biological hazards; acquisition, use, transfer and destruction of hazardous agents; and other related topics.

**h. Evaluation:**

(1) The Research Service conducts an annual multidisciplinary Vulnerability Assessment which includes involvement of the VA Police Service, the Research Service Administrative Officer, the Biosafety Officer, and the Research Compliance Officer.

(2) The RHJVAMC SRS committee and Academic Affiliate conduct disaster and fire drills throughout the year. Results of these drills are reported to the SRS and R&D committees and recorded in respective minutes.

(3) Corrective action plans are developed and evaluated for any deficiencies discovered through these processes.

**REFERENCES:** VHA Handbook 1200.06: Control of Hazardous Agents in VA Research Laboratories; VHA Handbook 1200.08: Safety of Personnel Engaged in Research; VHA Handbook 1200.12: Use of Data and Data Repositories in VHA Research.

**RESPONSIBLE OFFICE:** The RHJVAMC Research Service is responsible for the contents of this standard operating procedure.

**RESCISSION:** none

**RECERTIFICATION:** This document is scheduled to be evaluated in December 2017. Policies will be reviewed annually at the convened January SRS committee meeting.



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