

# The Implementation of a Biorisk Management System (CWA 15793:2008) and Process Improvement using an ABSL-3 Research Project as a Model System

Kalpana Rengarajan, PhD, MPH, RBP

Emory University

ABSA Conference

October 23, 2013



Environmental Health  
and Safety Office  
Research Administration



# What is the CEN Workshop Agreement (CWA)?

- **CEN = The European Committee for Standardization**
- **CEN Workshop Agreement (CWA 15793:2008):**
  - **The first internationally recognized management systems standard to address biological risks and improve Biosafety and Biosecurity performance**
  - **Developed by an open workshop structure through consensus within the framework of CEN**
  - **Adopted and published in 2008 with 76 participants from 24 countries**
  - **Compatible with other management systems standards such as: ISO 14001:2004 and OHSAS 18001:2007**



# CWA 15793:2011

- **CWA 15793:2011 replaces CWA 15793:2008**
  - **Only editorial changes implemented - the word “standard” in the original document replaced by “CWA” or “Agreement” wherever appropriate based on a request to CEN by the CEN National Members**
  - **In 2012 CEN Workshop 55 published CWA 16393:2012 – Guidelines for the implementation of the CWA 15793:2008**
  - **Both documents are available for free download through the CEN website**



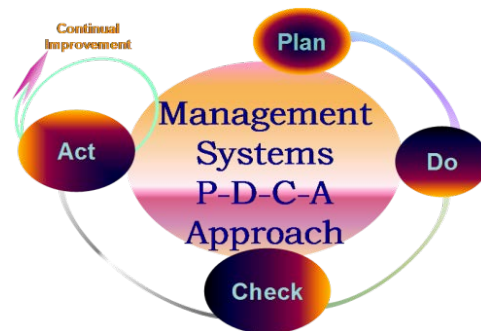
European Committee for Standardization  
Comité Européen de Normalisation  
Europäisches Komitee für Normung

# Purpose of the CWA

- The CWA can be used for:
  - Improving biorisk performance at any level (e.g., institutional level, department level, **program level**)
  - Effectively managing complex laboratory safety and security processes as they relate to biosafety
  - Improving national and international laboratory collaboration leading to safety harmonization
  - Building stakeholder confidence

# CWA is a Management System Standard

- Management systems are frameworks that integrate best practices and procedures built around the PDCA cycle:
  - Plan
  - Do
  - Check
  - Act
- The CWA is voluntary and not intended to replace any national or sub-national regulatory requirements that may apply to a research laboratory or facility
  - **Compliance with regulatory requirements is mandatory**



# Background

- In 2012, initiated implementation of CWA at a **program level**
- Validated a ABSL-3 facility to conduct research with recombinant influenza viruses and West Nile Virus in guinea pigs and mice
  - Prior to validation, conducted a gap analysis (based on CWA 15793) and gave a score of 1,2 Or 3.
- The gap analysis allowed us to:
  - Determine which requirements are in place and to what degree they were implemented
  - Develop an implementation strategy for future use
  - Provide a framework that may be used as the basis for training and raising awareness of biosafety and biosecurity guidelines and best practices

# Objectives of this Study

- One year later, our aims were to conduct another gap analysis on the research performed in the same facility
- Goals:
  - To see if items that scored 1, 2 or 3 in 2012, remained the same
  - To see if the prioritized gaps from previous year were closed
    - Example: installation of redundant exhaust fan
  - To continually improve the implementation of the CWA in the ABSL-3 facility

# Methods to Implement the CWA

**Step  
1:**

**Perform a gap analysis  
by analyzing the  
existing program  
processes and systems**

**Step  
2:**

**Compare gap analysis  
results of 2012 and  
2013**

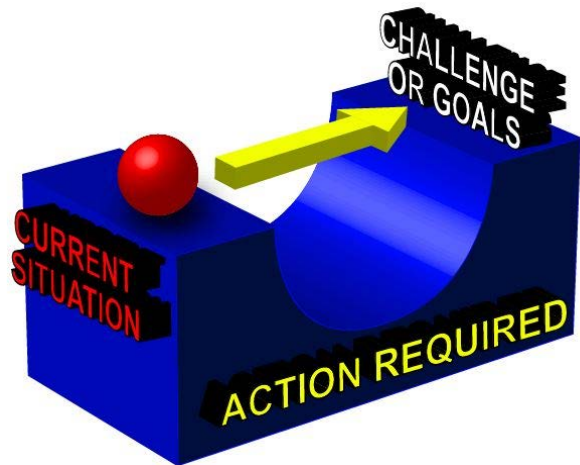
**Step  
3:**

**Review existing gaps,  
prioritize and create  
new goals and  
objectives for 2014**



# The Gap Analysis Tool

- Developed based on the CWA 15793:2008 “Laboratory Biorisk Management Standard”
- Comprised of six major components and 391 questions



	<b>Topic</b>	<b># of Questions</b>
1	Biorisk Management System	8
2	Policy	11
3	Planning	44
4	Implementation and Operation	245
5	Checking and corrective action	71
6	Review	12

# How did we use this Gap Analysis Tool?

- Methodology
  - Used the scoring system to the right
  - Scored every line item in the gap analysis tool
  - Calculated the average score for each section and overall

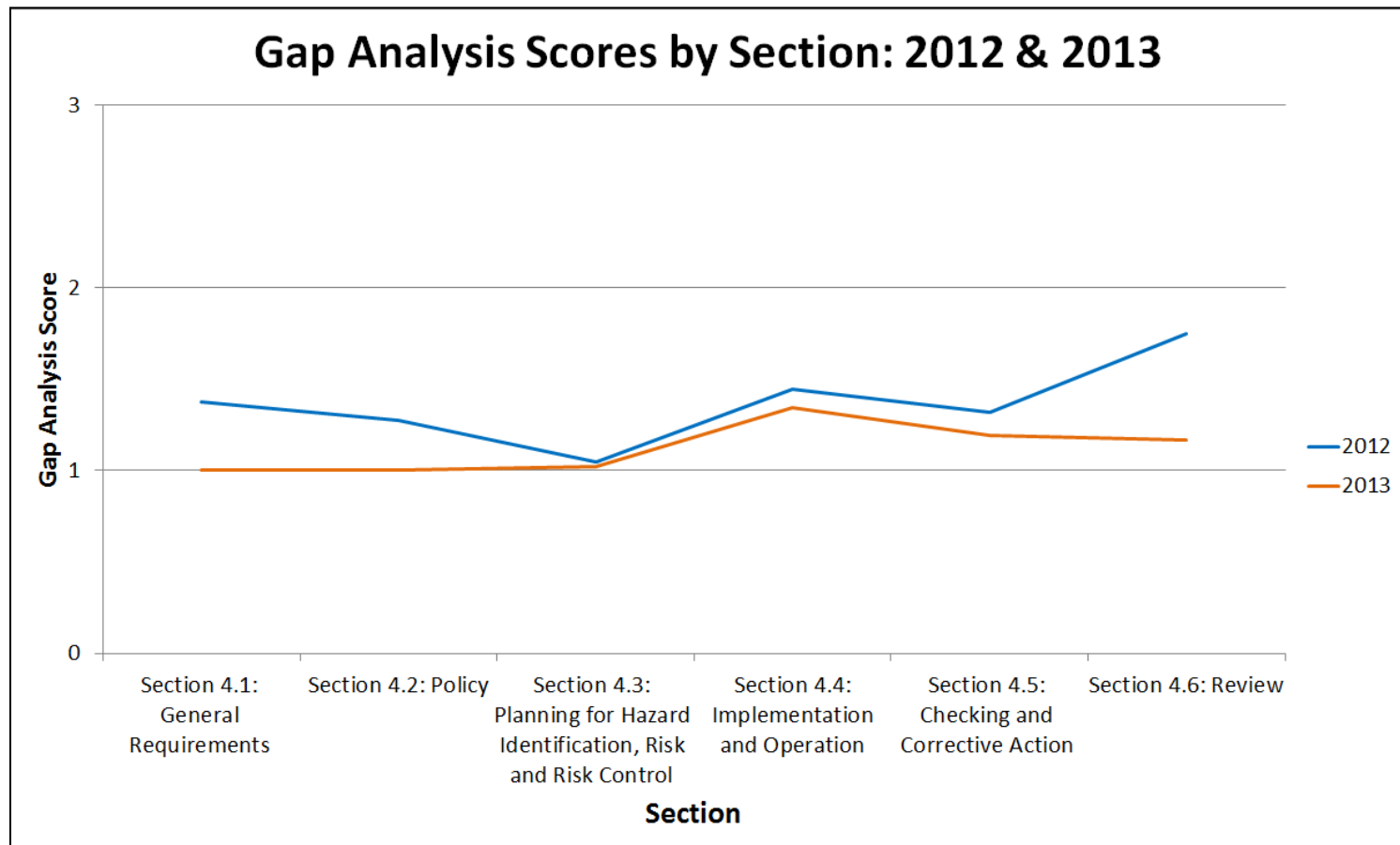


#	Item	Score	Comments
<b>Section 4.1: General Requirements</b>			
1	Has a Laboratory Biorisk Management System that complies with CWA15793 standard been established by the organization?	2	Not specifically pertaining to Biorisk management, but comprehensive EHS management system. The standard has been established.
2	Are the policy and objectives of the institution included in the Biorisk Management system?	2	
3	Are the legal requirements considered prior to establishing the Biorisk Management system?	1	Yes, through the comprehensive gap analysis and the Compliance Register.

# Results - Scores by Section

<b>Section</b>	<b>Average Score 2012</b>	<b>Average Score 2013</b>
4.1: General Requirements	1.38	1.00
4.2: Policy	1.27	1.00
4.3: Planning for Hazard Identification, Risk & Risk Control	1.05	1.02
4.4: Implementation and Operation	1.45	1.34
4.5: Checking & Corrective Action	1.32	1.21
4.6: Review	1.75	1.17
<b>Overall Score</b>	<b>1.38</b>	<b>1.26</b>

# Results - Scores by Section



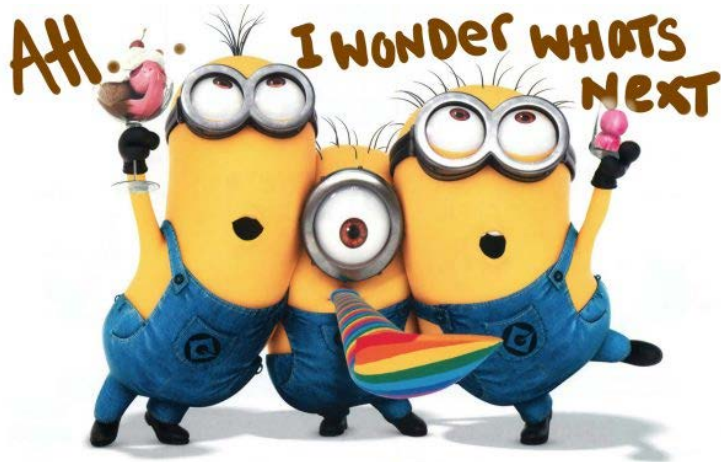
# Results - Changes in Scoring

	<b>Scoring 2012 → 2013</b>	<b>Number of Items</b>
Positive change	3 → 2	8
	3 → 1	4
	2 → 1	26
No change	3 → 3	35
	2 → 2	19
	X → N/A*	35

\* N/A questions were removed from the scoring

# Study Findings

- Overall improvement in all six components
- At Emory, we are establishing a comprehensive EHS-MS, which integrates biorisk management systems along with environmental, general safety, occupational management systems.
  - Integrated approach has improved our scoring in the first two components: general requirements and policy
- The CWA is a performance based initiative
  - During facility inspections by interviewing lab and animal care personnel we have evaluated their understanding of policies, SOPs, etc.
- One major gap (lack of a redundant exhaust fan) was corrected through active involvement of relevant stakeholders
- Items pertinent to select agents were marked as N/A



- The gap analysis is intended to be used as a living and evolving document
- Is a tool to determine what the current situation is, where action is critically needed, and gain support from upper management to close discovered gaps
- We will continue to:
  - Prioritize action items based on program needs and available resources
  - Assign corrective actions to appropriate responsible individuals
  - Document procedures used and time spent to close the gaps
- Gaps targeted for the next year:
  - ABSL-3 contingency planning , emergency drills

# Thank You

- Meagan Fitzpatrick (EHS Professional in Biosafety Program)
- Maria Mendez, MS (Assistant Director, EHSO)
- Patty Olinger, RBP (Director, EHSO)

