Managing Personnel Reliability at the University of Texas Medical Branch

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Environmental Health and Safety

What is a Personnel Reliability (PR)?

- Personnel Reliability (PR) is a component of biosurety

- It is the determination of trustworthiness of an individual to be working with hazardous material/sensitive data or having access to them

Trust
is the reliance of the integrity, strength, ability, surety of a person

Why do you need Personnel Reliability Program?

- Regulatory mandate
  - Select Agent Facilities that handle Tier 1 agents

- Good practice for everyone else to ensure the safety and security of staff/students, the public and the institution

- Identify insider threat
  - Nefarious purpose
  - Retaliation against an individual/institution
  - Negligence

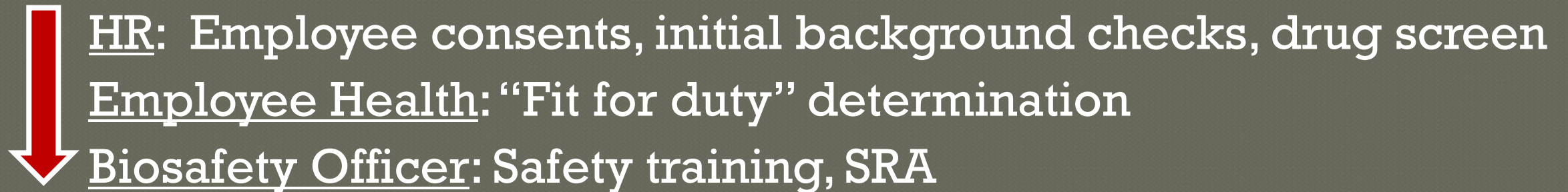utmb Health

Research at UTMB

- Over 1.1 million ft^2 of research space
  - BSL 1-4, ABSL 1-4, ACL 1-4
  - ~900 Scientific staff
  - 197 Principal investigator
  - 363 laboratories

- Secure Select Agent Facilities
  - BSL 3-4, ABSL 3-4, ACL 3-4 49,243 net ft^2
  - >15 years of BSL-4 operations
  - ~350 SRA-approved Employees
    - Scientific and support staff

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UTMB's Approach to PRP

- Protecting personal information from public disclosure

- Look for innovative ways to address PRP

- Conform to state laws and employment policies

- Improve and stream line existing reliability measures already in place

- Strong belief that an effective PRP is an institutional responsibility

- Focus on staff, the complexities and stress of research, pathogenicity of agents

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Process of the UTMB PRP

- Sequential, compartmentalized reviews by HR, Employee Health Service, and Biosafety Officer/ARO to protect confidentiality and ensure expert evaluation at each step

    <u>HR</u>: Employee consents, initial background checks, drug screen
    <u>Employee Health</u>: "Fit for duty" determination
    <u>Biosafety Officer</u>: Safety training, SRA

- Access is granted only with positive determinations from each preceding level of review

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Human Resources- Pre- Hire all staff

- Informed consent:
  - Informs applicant of program requirements
  - Reviews restricted persons criteria
  - Previous employer and reference check release

- Previous employment records
- Education verification
- Drug screen

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HR– Background check

- Suspected terrorist list
- FBI alleged suspects
- Designated foreign terrorist organization list
- FBI's most wanted
- OSFI-Individual Terrorist
- OSFI-Entities of concern to the business community
- Bank of England
- European Union list

- Sanctioned countries
- Denied person list
- Unverified list
- List of debarred parties
- Selective service verification
- EPLS: Excluded party screening
- Sex offender registry
- National Criminal Access Search (7 years)

Personnel Evaluations

- At the time of hire
- On a regular schedule by a supervisors
- During training
- When needed

- Includes
  - Attitude regarding instruction given
  - Comments made during conversations
  - Work ethic
  - Accuracy of record keeping

Conducted by different staff (non-medical professional) evaluating attitudes and state of mind of staff they interact with.

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Employee Health Services

- Routine medical questionnaire:
  - Completed annually
  - Required for BSL-2 – BSL-4

- Respiratory fit test
  - Completed annually
  - Required for BSL-3 - BSL-4

The college investor

Employee Health Services

- Review of relevant medical records as need

- Current medications
- Allergies
- Vision
- Bronchitis
- Asthma
- Pneumonia
- Tuberculosis

- Abnormal breathing tests
- Hepatitis
- Diabetes
- Thyroid
- Immunological disease
- Skin issues

- Unexplained fever
- Bleeding problems
- Previous exposures
- Immunizations

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Employee Health Services

BSL-4 and Tier 1 users ONLY

Complete medical assessment (at time of enrollment and every 3 years)

- Full physical
- Audiogram
- PPD
- Vision testing
- Chest X-ray
- Spirometry
- EKG
- Drug screen

- Alcohol test
- CBC
- Required immunizations
- Baseline serum collection
- Hepatitis panel
- HIV

- Urine dip
- Comprehensive metabolic panel

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Employee Health Services

Mental health assessment (every 3 years)

- Clinical interview
- Depression, anxiety, and substance abuse
- Referral for clinical assessment as needed
- Quality assurance review

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Employee Health Services Summary

	New Employee pre-hire Medical Evaluation	Medical Questionnaire (q 1 year)	Respiratory Fit Test (q 1 year)	Complete Physical Assessment (q 3 years)	Drug and Alcohol screen (q 3 years)	Mental Health Assessment (q 3 years)
All Staff	X					
BSL-2	X	X				
BSL-3	X	X	X			
BSL-4/ Tier 1	X	X	X	X	X	X

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Select Agent Program

- SRA approval process
- Security Training
- Biosafety theoretical and hands on classes
  - Pre and post assessments
- Biosafety Officer check off and review
  - Ensures appropriate training & documentation is complete

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Select Agent Program

- Facility safety and security orientation

- Mentorship
  - Must be mentored for specific number of hours

- Annual training
  - Biosafety and incident response
  - Biosecurity
  - Restricted persons self declaration

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Security check

- Per UTMB policy if an employee is arrested or convicted of certain crimes they are required to self-report to HR.

- For all individuals enrolled in the UTMB Tier 1 select agent program

  - Every 1.5 years Campus Police runs a background check for criminal activity

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Reporting process for concerns

- Reporting
  - Self
  - Peer
  - Supervisor

- Need a safe process free of repercussions
  - From colleague
  - From supervisor
  - From institution

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Reporting process for concerns

- Need multiple options to report
  - To the supervisor
  - To the facility director
  - To the biosafety office
  - To the occupational health staff
  - To campus police

It is important to protect the confidentiality and trust of the staff

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Opt - out of containment work

- The ability of staff to remove themselves from the laboratory without repercussions

- When to activate
  - When one is not in the correct frame of mind to work with hazardous materials
  - When one is on temporary medical restrictions

- Can be voluntary or mandated

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Opt - out of containment work

- Communicate with
  - Biosafety Officers
  - Supervisors
  - Laboratory Directors
  - Employee Health

It is important to protect the confidentiality and trust of the staff

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PRP Risks

- Overly prescriptive rules could hinder local implementation

- Federal rules don't provide information protection

- Specific metrics exclude various populations (i.e. students)

- Financial burden over whelms smaller institutions

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PRP Risks

- Lawsuits

- Abuse of the system via false reports, retaliation, access to information

- Poor decisions are made for the wrong reasons

- Peer reporting fails

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Culture of Responsibility

It is the responsibility of the administration to support the processes that are in place.

It is the responsibility of each person to be aware of their surroundings and their co-workers.

It is the responsibility of each person to seek information and help when necessary.

It is the responsibility of the entity as a whole to make the process work.

Thank You

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