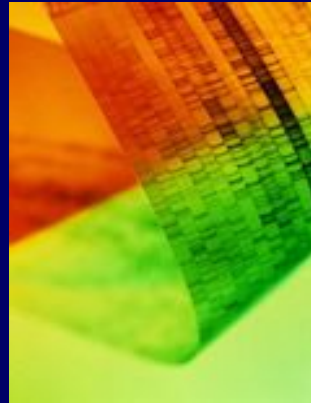
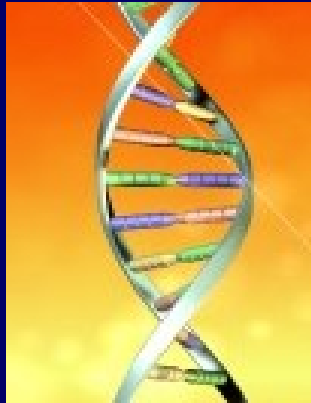


# Report of the NSABB Working Group on Culture of Responsibility



October 19, 2010

# WG Roster

- Paul Keim (co-chair)
- Stan Lemon (co-chair)
- Arturo Casadevall
- Murray Cohen
- Susan Ehrlich
- Pat Fitch
- Mike Imperiale
- Joe Kanabrocki
- Randy Murch
- Andrew Sorenson
- Dennis Dixon (NIH/NIAID)
- Anne Kinsinger (DOI)
- Jane Knisely (NIH/NIAID)
- Laura Kwinn (HHS/OS)
- Jan Nicholson (CDC)
- Jessica Petrillo (State Dept.)
- Rob Weyant (CDC SAP)
- Ed You (DOJ/FBI)



# CRWG Aims

- **Identify strategies and develop specific guidance for enhancing the culture of responsibility (CR) among individuals with access to BSATs**
  - **Implementation should be at the local level**
  - **Assist institutional and laboratory leadership in developing and implementing practices that promote a culture of responsibility**
  - **Broadly engage the scientific community**



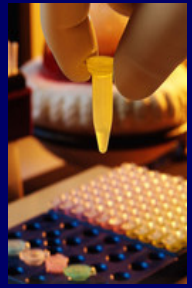
# Approach

- Review and elaborate on recommendations in the NSABB report on personnel reliability
- Identify additional practices for promoting CR
- Consult with the scientific community
  - July 15: Building Personnel Reliability at the Local Level: A Roundtable on Enhancing CR
  - Sept 2: Roundtable on Practices for Enhancing Personnel Reliability and the Culture of Responsibility in High Containment Labs
  - Scheduling: Panel on legal considerations for hiring practices
  - Planning: Public consultation on ways to enhance CR and PR



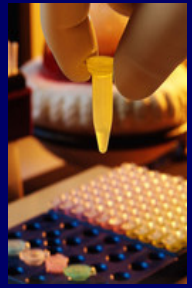
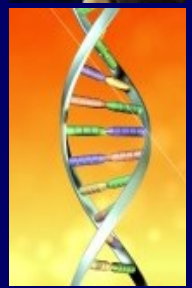
# Proposed Introductory Concepts

- **Premise: Personnel reliability is the responsibility of local institutions**
  - A strong culture of responsibility with respect to biosecurity and biosafety is probably the most effective tool for enhancing biosecurity and personnel reliability
- **Discussion of what is meant by “culture of responsibility”**
- **With a few exceptions, the proposed strategies are applicable to all life sciences research, not just BSAT research, and in many cases could apply to all sciences**
- **For all proposed practices for enhancing CR, training will be essential!**



# Categories of Practices for Enhancing PR and CR

- **“Best practices”**
  - Widely agreed upon, broadly applicable
- **“Potentially useful practices”**
  - Less broadly applicable; use should be based on risk assessment at local level
- **“Other practices that have been considered”**
  - More controversial, may be subject to local laws
  - Articulate pros & cons








# Proposed “Best Practices” to be Elaborated

## 1. Good hiring and employment practices

- Go beyond verifying scientific bona fides and competence; explore reliability and biosecurity dimensions with current and previous employers
- How to address liability concerns about sharing derogatory information or negative perceptions about a current or former employee

# Proposed “Best Practices” to be Elaborated

- 
- 2. Encourage biosecurity awareness and promote responsible conduct**
    - At the level of institutional leadership
    - At the laboratory level
  - 3. Explicitly articulate the institution’s expectations of employees**
    - Expectations should be in writing, signed by employee, and become part of employee record



# Proposed “Best Practices” to be Elaborated

## 4. Peer reporting of concerning behavior

- Explain purpose and importance of awareness and vigilance
- Provide guidance on:
  - The types of behaviors and behavior changes that might be of concern
  - To whom concerns should be reported
  - Protections in place for reporter and subject of report
  - Extent to which privacy and confidentiality can be maintained





# Proposed “Best Practices” to be Elaborated

## 5. Opting out of research with BSATs

- Provide guidance on:
  - When this might be necessary
  - When and to whom such decisions should be reported
  - Under what conditions should restricted access be lifted
  - Minimizing potential for professional stigmatization



# Proposed “Best Practices” to be Elaborated

## 6. Local review (risk assessment) of all BSAT research

- Not just research involving recombinant DNA or requiring high containment
- Consider reliability of all staff associated with the research and whether they have been appropriately trained re biosecurity and DUR issues
- Include public representation



# Proposed “Potentially Useful Practices” for Consideration by Local Institutions

## 1. Video monitoring of BSAT labs

- Can be utilized for biosafety and biosecurity purposes
- Can be resource intensive
- Use should be based on a risk assessment conducted by local institution and should not be a federal requirement



# Proposed “Potentially Useful Practices” for Consideration by Local Institutions

## 2. “Two Person” rule

- Can be implemented for biosafety and biosecurity purposes
- Can be resource intensive and in some situations may have negative impact on safety
- Use should be based on a risk assessment conducted by local institution and should not be a federal requirement

# Proposed "Other Practices That Have Been Considered"

## Examples:

- 1. Drug and alcohol testing**
  - State laws may prohibit testing
- 2. Credit checks**
  - Many reasons for debt
  - Problematic in an academic setting
- 3. Search social networks (e.g., Facebook)**
  - May not be accurate/legitimate





# Additional Topic to Address?

- **Metrics and methods for evaluating the effectiveness and impacts of practices aimed at enhancing personnel reliability and CR**
  - Always a challenge!



# Discussion

- Did we miss anything?
- Any concerns, suggestions?

