

## Research Program Policy &amp; Procedures

## Physical Security of all Research Space and the Control of Hazardous Agents in Research Laboratories

**PHYSICAL SECURITY OF ALL RESEARCH SPACE;  
AND  
THE CONTROL OF HAZARDOUS AGENTS IN  
RESEARCH LABORATORIES**

**1. PURPOSE:** To establish a policy regarding physical access security as well as the control of hazardous agents in the laboratories of the Research & Development (R&D) Service.

**2. POLICY:** R&D laboratories will be secured in keeping with the intent and scope of VHA Handbook 1200.06 and VHA Handbook 1200.08, which outlines prevention and/or detection of terrorist events and policy for housing select agents and toxins in VA R&D laboratories. The policy applies to all individuals entering the secured area, to include, but not limited to, VA employees, without compensation (WOC) employees, contract employees, vendors, employees from other Medical Center services, and visitors.

**3. DEFINITIONS:**

a. **Authorized Individual:** A VA employee appointed on a full-time, part-time, intermittent, fee basis, or WOC appointment, that has undergone credentialing and a background check required for appointment to a Title 5, Title 38 or Title 38 Hybrid position or as a WOC. In addition, the individual has an approved security risk assessment as required in 42 Code of Federal Regulations (CFR) 73.8, 7 CFR 331.10, or 9 CFR 121.11. An authorized individual may also be a contractor or vendor who has undergone the required credentialing and background check as well as having an approved security risk assessment.

b. **Exempt Quantities:** Permissible amounts of toxins that an investigator is allowed to store or use that are not subject to regulations found in 42 CFR Part 73 and 9 CFR Part 121. The toxins and the exempt quantities of toxins may be found at <http://www.cdc.gov/od/sap/>.

c. **Hazardous Agent:** Any biological material including the Centers for Disease Control (CDC) list of select agents and toxins ([Download CDC Select Agent Regulations \(42 CFR Part 73\)](#)), Animal and Plant Health Inspection Service (APHIS) biological agents ([Download APHIS Select Agent Regulations \(7 CFR Part 331\)](#)), ([Download APHIS Select Agent Regulations \(9 CFR Part 121\)](#)), and products of such biological material, i.e. toxins. Hazardous agents also include highly toxic chemicals, exempt quantities of toxins, or gases that have the potential for being used as weapons of mass destruction, as well as radioactive materials and/or radioactive sources (Attachment A). When additional agents are added to or deleted from the hazardous agent list that are not contained in the CDC or APHIS list, the new list will be posted on ORD's website. A notice will be sent to all facilities when agents have been added to or deleted from the list. The terms "select agents" and "toxins" refer to both the CDC select agents and toxins and the APHIS biological agents and toxins.

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d. **Minor:** Any individual under the age of 18.

e. **Portland Veterans Affairs Medical Center (PVAMC) R&D Laboratories:** R&D laboratories under the control of the PVAMC. In the context of VHA Handbook 1200.06, the R&D laboratory director is the PVAMC investigator responsible for a particular laboratory. R&D laboratories include:

- (1) PVAMC R&D laboratories located within PVAMC facilities, or in leased space;
- (2) PVAMC R&D laboratories located in approved off-site facilities such as affiliate universities; and
- (3) Laboratories within the PVAMC in space that is leased to a private entity.

f. **Select Agent:** One of a group of agents (viruses, bacteria, rickettsiae, fungi, toxins, and recombinant deoxyribonucleic acid (rDNA) designated by the CDC as requiring registration with the CDC Laboratory Registration Program. The regulation of select agents is codified in 42 CFR Part 73, "Possession, Use and Transfer of Select Agents and Toxins; Interim Final Rule." For the purposes of this policy, select agents and hazardous agents are synonymous, and are to be handled at the same level of security. The terms select agents and toxins also refers to biologic agents and toxins that the Secretary of Agriculture has determined to have the potential to be a severe threat to animal and plant health (7 CFR Part 331 and 9 CFR Part 121). Refer to:

- (1) Attachment A for a list of hazardous agents;
- (2) CDC's website (<http://www.cdc.gov/od/sap/>) for select agents and toxins; and
- (3) APHIS website (<http://www.aphis.usda.gov/>) for a list of regulated biological agents and toxins.

g. **Sensitive Materials** include, but are not limited to, any hazardous agents as identified in Attachment A, as well as research equipment and/or supplies used to store, test, destroy or otherwise handle hazardous agents, and laboratory notebooks or other written or computerized records documenting possession of and/or research using hazardous agents.

h. **Terrorist Event:** The unauthorized removal or theft of hazardous agents capable of being used as weapons of mass destruction from R&D laboratories, or other VA-assigned space (including off-site space) and/or the unlawful use of such hazardous agents. It specifically encompasses the illicit and unauthorized use of VA research laboratory facilities (including equipment, supplies, computers, faxes, phones, etc.) for the production, purification, or dissemination of any hazardous agent. The term also refers to the illegal transfer of agents into or out of R&D laboratories and other research space such as animal care facilities, storage areas, offices, etc. The term may also refer to activities such as dissemination, detonation, and contamination of hazardous agents, select agents, toxins or sensitive materials within R&D laboratories or the building housing these laboratories.

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i. **Toxin:** The toxic material or product of plants, animals, microorganisms (including, but not limited to, bacteria, viruses, fungi, rickettsiae, or protozoa), or infectious substances, or a recombinant or synthesized molecule, whatever their origin and method of production. This includes any poisonous substance or biological product that may be engineered as a result of biotechnology or produced by a living organism, or any poisonous isomer of a biological product, homolog, or derivative of such a substance (refer to 42 CFR 73.1).

j. **USA Patriot Act:** Public Law 107-56, passed by Congress on October 26, 2001, in response to the terrorist attacks of September 11, 2001. The purpose of the Act is to unite and strengthen America by providing appropriate tools to intercept and obstruct terrorist acts. The law includes provisions to deter and punish terrorist acts, enhance law enforcement investigational tools, and other purposes such as aid to victims of terrorism. The Act also prohibits certain restricted persons from possessing biological agents or toxins that are identified as select agents in 42 CFR Part 73. This provision of the Act, codified at Title 18 United States Code (U.S.C.) § 175b, defines a "restricted person" as an individual who:

- (1) Is under indictment for a crime punishable by imprisonment for a term exceeding 1 year;
- (2) Has been convicted in any court of a crime punishable by imprisonment for a term exceeding 1 year;
- (3) Is a fugitive from justice;
- (4) Is an unlawful user of any controlled substance (as defined in section 802 of the Controlled Substances Act (21 USC 802));
- (5) Is an alien illegally or unlawfully in the United States;
- (6) Has been adjudicated as a mental defective or has been committed to any mental institution;
- (7) Is an alien (other than an alien lawfully admitted for permanent residence) who is a national of a country as to which the Secretary of State, pursuant to section 6(j) of the Export Administration Act of 1979 (50 USC App 2450(j)), section 620A of chapter 1 of part M of the Foreign Assistance Act of 1961 (22 USC 2371) , or section 40(d) of chapter 3 of the Arms Export Control Act (22 USC 2780(d)), has made a determination (that remains in effect) that such country has repeatedly provided support for acts of international terrorism; and/or
- (8) Has been discharged from the Armed Services of the United States under dishonorable conditions.

k. **Weapons of Mass Destruction** as referenced in the USA Patriot Act, is defined in 18 United States Code (USC) § 2332a. It includes destructive devices (as defined in 18 USC § 921); weapons designed or intended to cause death or serious bodily injury through the release, dissemination, or impact of toxic or poisonous chemicals or their precursors; weapons involving certain biological agents, toxins or vectors (defined in 18 USC § 178); or weapons designed to release radiation or radioactivity at a level dangerous to human life.

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**4. RESPONSIBILITIES:**

a. The **Associate Chief of Staff for R&D Service (ACOS/R)**, by and through the Deputy ACOS/R and **Administrative Officer for R&D Service (AO/R)**, is responsible for:

- (1) Developing and implementing appropriate security policies; and
- (2) Ensuring that the facility Director remains informed of all activities involving hazardous agents, select agents, toxins and other sensitive materials in VA R&D laboratories.

b. The **Subcommittee for Research Safety (SRS)**, which reports to the **R&D Committee**, has been delegated responsibility for:

- (1) Assisting the Medical Center Director in carrying out the responsibilities of the RO.
- (2) Controlling access to Portland Veterans Affairs Medical Center (PVAMC) research laboratory areas housing select agents, toxins, other hazardous agents and to Biosafety Level Three (BSL3) research laboratories by:
  - (a) Reviewing and making recommendations to the Medical Center Director for approval or disapproval of requests to grant authorization for access to BSL3 laboratories and laboratories using or storing select agents or toxins.
  - (b) Reviewing and taking action on requests for employees (paid or non-paid) or contractors to work in BSL3 laboratories not containing select agents or toxins.
  - (c) Reviewing the employment status of personnel granted access to secured research areas at least semi-annually;
- (3) Reviewing and approving requests for a CDC or APHIS laboratory registration number;
- (4) Approving or disapproving requests to purchase, transfer, use or destroy select agents or toxins including exempt quantities of toxins; and
- (5) Conducting a semi-annual review of Principal Investigator (PI) inventories and reporting this information to the R&D Committee semi-annually.

c. **VA Investigators, Laboratory Directors, Research Investigators and Research Staff**, regardless of appointment status (i.e., paid or non-paid), are responsible for:

- (1) Complying with all provisions of this policy;

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- (2) Obtaining appropriate authorizations and, if applicable, committee and/or subcommittee approvals prior to beginning work in R&D laboratories;
- (3) Ensuring that those individuals they supervise have received approval to access secured research areas prior to beginning work;
- (4) Ensuring that their staff have received required training;
- (5) Complying with information specific to the hazardous nature of materials they will be using and the security precautions to be followed in handling, transferring or destroying such materials, as well as containment procedures;
- (6) Reviewing, accounting and maintaining a continuously updated inventory of hazardous agents including select agents or toxins. The accounting will be forwarded to the Industrial Hygienist, through the SRS, on a semi-annual basis for review.
- (7) Reporting theft, loss or release of select agents or toxins as outlined in VHA Handbook 1200.06.

**5. PROCEDURES:**

## a. Employment of Minors:

(1) The PVAMC is committed to making the areas in which minors volunteer and/or work as safe as possible. Minors between the ages of 16 and 17 are approved to work and/or volunteer within R&D Service under a WOC appointment only. The following guidelines were designed to create a safe and appropriate learning environment for minors who visit/work at the PVAMC. As part of the agreement between such minors and their mentors, the Principal Investigator or designated lab staff must be present and supervising the minor *at all times*. In addition, minors must present written permission from their parent(s)/legal guardian(s) in order to participate in any research experience at the PVAMC (see Attachment B). (NOTE: No minor younger than 16 may volunteer/work within R&D Service.)

**(a) Radiation Hazards**

- i. Minors are prohibited from using radioactive materials and/or working within labs with, or licensed for, radioactivity.
- ii. Any accidental exposure to radioactive materials, known or suspected, is to be reported immediately to Radiation Safety Officer extension 54483.

**(b) Biological Hazards**

- i. Minors may not use or be exposed to unfixed human or non-human primate biological tissues, body fluids, tissue cultures, or cells. They may, under supervision, perform certain functions with fixed tissues (e.g., examine slides under the microscope), or work with tissue cultures or cells not of human or non-human primate origin that are not infected with viral vectors.

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ii. Minors may not work directly with infectious agents designated as BSL2 or higher by the SRS.

(c) **Chemical Hazards**

i. Minors are not to be exposed to (unless an exception is granted), or come into contact with, hazardous chemicals designated hazard level two or above for flammability (red diamond), health (blue diamond), instability (yellow diamond), or have any special warnings (white diamond) as identified in the National Fire Protection Association (NFPA) label provided by the supplier. Questions regarding NFPA hazard levels will be directed to the Chemical Hygiene Officer and/or the Industrial Hygienist. Contact the Chair, Subcommittee on Research Safety for exceptions to the above requirements for the use of chemicals, hazard level two and above, in commonly used laboratory procedures.

ii. Minors may not handle controlled substances or regulated materials.

(d) **Physical Hazards**

i. Minors may not use mechanical or electrical power tools or equipment, or drive a vehicle (government or personal) in the performance of their job duties. Laboratory equipment such as centrifuges, electrophoresis units, microscopes, transfer apparatus, and PCR cyclers are exempt.

ii. Minors are specifically prohibited from using microtomes.

(e) **Training**

i. Any specific safety training required for PVAMC staff in the lab, hospital or facility must be completed by the minor and verified by the PI/supervisor.

(f) **Permissible Working Hours**

i. Minors aged 16 and 17, may work any time of year and any hours, with no daily restrictions but with a maximum of 44 hours/week.

(g) **Parental Consent**

i. The PI/Supervisor must complete a "Parental Consent" form which is to be shared with and, signed by, the minor and their parent or guardian (see attachment B). Human Resources Management Service (HRMS) will keep completed Parental Consent forms on file as part of the without compensation appointment file.

(h) **Compliance**

i. Minors failing to abide by these guidelines are subject to immediate dismissal.

ii. PIs/supervisors failing to abide by these guidelines may be denied the privilege of hosting minors, at the discretion of the ACOS/R.

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b. Physical Security:

(1) Access to secured research areas is controlled and limited to authorized individuals. No R&D laboratories will be open to the public. All laboratory areas, including the VMU and storage areas, include a state-of-the-art electronic Personal Identity Verification (PIV) card reader that generates permanent, dated records with identification of persons entering the area and times of entry. Entry is controlled on a 24-hour/7-day per week schedule.

(2) PIV card access is granted by the Deputy ACOS/R or AO/R to allow entry of authorized personnel into the secured areas.

(3) A record of PIV card assignments is current at all times. Personnel leaving employment or no longer working in an R&D laboratory must adhere to full clearance and checkout procedures to include turning in all identifications, keys, PIV cards and other access items.

(4) Authorized health and safety inspectors, emergency response staff, Police Service, inspectors from regulatory agencies, and personnel from VHA oversight offices will have access to the secured area. The nature of that access will be determined on a case-by-case basis, based upon the frequency of access needs, the potential urgency of access needs, and the potential for after-hours access needs.

c. Cyber Security:

(1) All individuals who request access to the VA computer system must become either a paid or non-paid (without compensation, WOC) employee of the PVAMC.

d. Physical Access Control:

(1) The AO/R, as a designee of the SRS, will grant authorized access to secured research areas.

(2) The process of obtaining authorization to enter the secured area begins with the PI or supervisor.

(3) Depending upon the type of employment, i.e. VA, non-profit corporation, university affiliate, or volunteer, each individual requiring access to the secured research area must complete the required paperwork as outlined at <http://www.portland.va.gov/research/piservices/hiring/appointmentrequirements.asp>.

(4) Criteria and elements to be considered when granting approval: acceptable and work-related need to be in secured area; certification that an individual is not a prohibited person; application and PI/supervisor request completed; copy of photo ID (driver's license preferred); statement of U.S. citizenship OR copy of current and legal permission to be in U.S.; favorable adjudication from

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criminal record check; age of the individual requesting access; and verification that required training has been completed.

(5) The SRS must review the continued status of staff access annually. The SRS must approve renewal of staff access to secured research areas housing hazardous materials semi-annually, with concurrence/approval required by the R&D Committee. Factors that will be considered when addressing requested renewal include:

- (a) the number and nature of security exceptions by the individual;
- (b) whether required training is current; and
- (c) security related information deemed pertinent to the SRS.

**e. Background and Security Clearances:**

(1) All individuals must have a favorably adjudicated background check on file within HRMS.

**f. Requirements after Entry has been Authorized:**

(1) All authorized individuals must wear their VA identification badge at all times.

(2) Personnel may enter the secured area only to perform required duties.

(3) Unauthorized persons entering the secured area will be reported to Police Service.

(4) It is the responsibility of each authorized individual to:

- (a) Use their PIV card only for personal entrance into the secured area.
- (b) Not allow any individual to follow them through the door.
- (c) Report any security violations, including unauthorized individuals
- (d) Immediately notify the Research Administration Office when R&D secured area access is no longer necessary.

(5) Prohibited persons will not be granted access to the BSL3 laboratory, the VMU or other research areas that have increased security controls. Prohibited persons may be granted access to the general secured area on a case-by-case basis, as approved by the SRS with concurrence of the R&D Committee.

(6) Each individual must receive training as outlined in the Education Requirements for the Conduct of Research policy and procedure.

**g. Administration:**

(1) The AO/R or designee makes recommendations to the Chair/SRS in relation to approval of secured area access. The Chair/SRS makes final approval in regard to access approval.

(2) Irregularities in security access will be reported to the Police Service and the SRS, who will make recommendations for action to the R&D Committee and/or the Medical Center Director.



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(3) In the event an individual with secured access inexplicably disappears, or is suspected to have violated procedures or committed a security breach, Police Service will be notified immediately. The VA Police, in consultation with the ACOS/R, will determine whether further action is necessary.

(4) The ACOS/R, or designee, will conduct a review of access records on a monthly basis. Each month a random sample will be pulled, reviewed, and maintained for review and trending of results. Irregularities will be reported to Police Service.

(5) An annual vulnerability assessment will be conducted by a multi-disciplinary team of the research laboratory area. The Deputy ACOS/R is responsible for informing Police Service of any issues affecting security.

(6) Safety Standards: All individuals given authorized access to secured and unsecured research areas must abide by all safety standards as mandated by Occupational Safety and Health Administration, Veterans Health Administration, and PVAMC.

(7) Emergency Preparedness Standards: All individuals given authorized access to secured and unsecured research areas must be knowledgeable of the R&D Emergency Preparedness Plan, as outlined in the PVAMC Emergency Management Plan.

h. Penalties: Failure to conform to the requirements may result in immediate withdrawal of VA research funding, suspension from the research program, and/or denied access to secured research areas. Individuals who knowingly fail to follow the provisions of this policy are subject to disciplinary action proportionate to the severity of the violation, up to and including termination of VA employment or without compensation (WOC) status and criminal prosecution.

**6. REFERENCES:**

a. 7 CFR 331, APHIS Select Agent Regulations.

(<http://www.ecfr.gov/cgi-bin/text-idx?SID=6dd3c5be9acb471f5672713013fccae2&node=7:5.1.1.1.9&rqn=div5>)

b. 9 CFR 121, Possession, Use, and Transfer of Select Agents and Toxins.

(<http://www.ecfr.gov/cgi-bin/text-idx?SID=6dd3c5be9acb471f5672713013fccae2&node=9:1.0.1.5.58&rqn=div5>)

c. 18 USC 175b, Possession by restricted persons.

(<http://www.gpo.gov/fdsys/pkg/USCODE-2012-title18/pdf/USCODE-2012-title18-part1-chap10-sec175b.pdf>)

d. 21 USC 802, Definitions.

(<http://www.gpo.gov/fdsys/pkg/USCODE-2012-title21/pdf/USCODE-2012-title21-chap13-subchapl-partA-sec802.pdf>)

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e. 22 USC 2371, Prohibition on assistance to governments supporting international terrorism.

(<http://www.gpo.gov/fdsys/pkg/USCODE-2012-title22/pdf/USCODE-2012-title22-chap32-subchapIII-partI-sec2371.pdf>)

f. 42 CFR 73, CDC Select Agent Regulations.

(<http://www.ecfr.gov/cgi-bin/text-idx?SID=6dd3c5be9acb471f5672713013fccae2&node=42:1.0.1.6.61&rgn=div5>)

g. MCM 00-15, Information Security Incident Reporting Handling.

(<http://moss.portland.med.va.gov/QP/Medical%20Center%20Memorandums/MCM%2000-15%20Information%20Security%20Incident%20Reporting%20%20Handling.docx>)

h. MCM 05-10, Personal Identity Verification.

(<http://moss.portland.med.va.gov/QP/Medical%20Center%20Memorandums/MCM%2005-10%20Personal%20Identity%20Verification.doc>) VHA Directive 1200.06, Control of Hazardous Agents in VA Research Laboratories.  
([http://www.va.gov/vhapublications/ViewPublication.asp?pub\\_ID=1336](http://www.va.gov/vhapublications/ViewPublication.asp?pub_ID=1336))

i. MCM 05-21, Personnel Suitability and Security Program.

(<http://moss.portland.med.va.gov/QP/Medical%20Center%20Memorandums/MCM%2005-21%20Personnel%20Suitability%20and%20Security%20Program.doc>)

j. MCM 138-09, Control of Proximity Cards.

(<http://moss.portland.med.va.gov/QP/Medical%20Center%20Memorandums/MCM%20138-09%20Control%20of%20Proximity%20Cards.doc>)

k. VHA Directive 0710, Personnel Suitability and Security Program.

([http://www.va.gov/vapubs/viewPublication.asp?Pub\\_ID=86&FTYPE=2](http://www.va.gov/vapubs/viewPublication.asp?Pub_ID=86&FTYPE=2))

l. VHA Handbook 0710.01, Position Risk and Sensitivity Designations Appendix A.

([http://www.va.gov/vapubs/viewPublication.asp?Pub\\_ID=87&FTYPE=2](http://www.va.gov/vapubs/viewPublication.asp?Pub_ID=87&FTYPE=2))

m. VA Handbook 0730, Security and Law Enforcement.

([http://www.va.gov/vapubs/viewPublication.asp?Pub\\_ID=93&FTYPE=2](http://www.va.gov/vapubs/viewPublication.asp?Pub_ID=93&FTYPE=2))

n. VHA Handbook 1200.08, Safety of Personnel Engaged in Research.

([http://www.va.gov/vhapublications/ViewPublication.asp?pub\\_ID=1850](http://www.va.gov/vhapublications/ViewPublication.asp?pub_ID=1850))

o. VA Handbook 5005, Part II, Chapter 2, Para. 4 (for Title 5) and Part II, Chapter 3, Section G, Para. 7 (for Title 38), Without Compensation Appointments.

([http://vaww1.va.gov/vapubs/viewPublication.asp?Pub\\_ID=175&FTYPE=2](http://vaww1.va.gov/vapubs/viewPublication.asp?Pub_ID=175&FTYPE=2)).

p. USA Patriot Act, Public Law 107-56.

(<http://www.google.com/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=4&cad=rja&uact=8&ved=0CDIQFjAD&url=http%3A%2F%2Fwww.justice.gov%2Ffoia%2Fspecial%2Fs0708%2Ffinal.pdf&ei=sTfEU4jaNY718gGq4IH0DQ&usq=AFQjCNEC5gULD13GWtRP2qc9VKCobZwvlg>)

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**7. RESCISSION:** MCM 151-02 December 4, 2009

**8. FOLLOW-UP RESPONSIBILITY:** ACOS/R

**MICHAEL P. DAVEY, MD, PhD**

**ACOS/R**

Attachments

A- Hazardous Biological and Chemical Agents

B- Parental Consent for Minors Working and/or Volunteering within R&D Service

## HAZARDOUS BIOLOGICAL AND CHEMICAL AGENTS

1. The Centers for Disease Control and Prevention (CDC) has identified certain biological, chemical and radioactive materials or agents as having potential for use as weapons of mass destruction. Improper use and/or containment of these materials or agents pose a risk to national security because of their:

- a. Ease of dissemination or transmittal between individuals;
- b. Potential for high mortality rates and major public health impact;
- c. Potential for causing public panic and social disruption; and
- d. Risk for public health preparedness.

2. Storage and/or use of these materials or agents in any quantity in a Department of Veterans Affairs (VA) research laboratory requires special consideration for physical security, personnel access, inventory control, and emergency preparedness. These include:

a. Select Agents and Toxins. A current list of select agents and toxins may be found at <http://www.cdc.gov/od/sap/>. This site also includes agents and toxins that are included on the United States Department of Agriculture (USDA) list of biological agents and toxins that overlap with the CDC list. This website contains:

(1) A list of toxin amounts (exempt quantities) permissible for an investigator to store or use without requiring compliance with Title 42 Code of Federal Regulations (CFR) 73; and

(2) A list of agents and toxins that have been excluded from the list of select biological agents and toxins.

b. List of USDA Biologic Agents and Toxins. A list of USDA biologic agents and toxins may be found at: <http://www.aphis.usda.gov/>.

c. Chemical Agents Considered to be Hazardous Agents. As of the date of publication of this Handbook, the following chemicals are considered hazardous agents. This list may be updated in the future and updates will be found on the Office of Research and Developments website: <http://vaww1.va.gov/resdev/>.

(1) 3-quinuclidinyl benzilate (BZ);

(2) Chlorine gas;

(3) Cyanogen chloride (CK);

(4) Cyclosarin (GF);

(5) Diphosgene (DP);

(6) Hydrogen cyanide (AC);

## Attachment A

- (7) Lewisite (L); NOTE: There are three individual chemicals included in this category.
- (8) Lysergic acid diethylamide (LSD);
- (9) Nitrogen mustard (FIN-i, HN-2, or I{N-3);
- (10) Phosgene (CG), also known as carbonyl chloride;
- (11) Phosgene oxime (CX);
- (12) Sarin (GB);
- (13) Soman (GD);
- (14) Sulfur mustard (H, or HD, or HT), also called mustard gas or mustard agents;
- (15) Tabun (GA); and
- (16) VX (VX is both the name and symbol).

### d. Radioactive Materials and/or Radiation Sources

(1) The special considerations required for radioactive materials and/or radiation sources need to be based on the specific radionuclide, the half-life, and the quantity present. For a “radiation high-risk” situation, more restrictive security measures need to be followed. For a “radiation low-risk” situation, basic security measures need to be followed.

(2) “Radiation high-risk” is a single location or room where the total activity of a single radionuclide with a half-life of more than 3 days is greater than one Curie and the radionuclide is received, store, or used. “Radiation low-risk” is any location other than a “radiation high-risk” location and where radioactive materials and/or radiation sources are received, stored, or used.

(3) As additional agents or materials are identified by the CDC, those agents or materials will be considered by VA as hazardous agents, and will be subject to the same security requirements as those agents or materials identified in preceding subparagraph 2c.

**PARENTAL CONSENT FOR MINORS WORKING AND/OR VOLUNTEERING WITHIN RESEARCH AND DEVELOPMENT SERVICE**

**INSTRUCTIONS:** The PI/Supervisor must complete the top portion of this form. Once complete the form is provided to the parent or legal guardian of the minor that wishes to volunteer and/or work within Research and Development Service at the Portland VA Medical Center (PVAMC). The parent or legal guardian completes the bottom half of the form and returns to the Research Administration Office (building 101, room 502).

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**PREPARED BY PVAMC PI/SUPERVISOR:**

Your child will be on PVAMC property to work or volunteer under a without compensation appointment for PI/Supervisor Name.

This experience includes:

PI/Supervisor: please describe the duties the minor will perform (i.e., minor will have contact with fixed human tissue, animal tissue or animal cell lines or fluid, minor will have contact with the following chemicals [please list specific chemicals], minor will have contact with patients, etc.)

For questions please contact PI/Supervisor Name at 503-Phone Number or email address@ohsu.edu or va.gov. Thank you for your cooperation.

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**PREPARED BY PARENT OR LEGAL GUARDIAN:**

**NOTE TO STUDENTS AND PARENTS:** The PVAMC is a federal building, and, as such, must be open to the public. Our employees, patients, and volunteers come from diverse backgrounds. Eligible veterans are entitled to services offered by the VA, even if they have had problematic incidents in their past - unless the law specifically disqualifies them. Our job is to provide veterans care and to protect our employees, patients, and volunteers as that care is provided.

**STUDENT VOLUNTEER:** If accepted, I agree to adhere to the policies and procedures of the PVAMC and to respect the confidentiality of information pertaining to the patients and their treatment. If a patient, staff member, volunteer, and/or visitor is abusive, makes inappropriate gestures, advances or conversation that is in a manner which makes me feel uncomfortable, I will immediately inform my PI/supervisor or other PVAMC staff member.

\_\_\_\_\_  
Signature of Child (Minor)

\_\_\_\_\_  
Print Name/Date

**PARENT/GUARDIAN:** The above named student has my consent as parent/guardian to work and/or volunteer within Research and Development Service at the PVAMC. I have read the above agreement as signed by my student and understand their obligation to the program. I also grant permission for my child to receive emergency medical treatment if injured while working and/or volunteering.

\_\_\_\_\_  
Signature of Parent or Guardian

\_\_\_\_\_  
Print Name/Date