

VAMHCS RESEARCH & DEVELOPMENT SERVICE  
RDS/SRS Process Module

PM-SRS-044

Effective Date: July 2016

REPORTING REQUIREMENTS FOR RESEARCH LABORATORY SECURITY  
EVENTS

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Applicable Regulatory Context:

[VHA Handbook 1058.01]:

This Handbook describes requirements for reporting compliance events in VA research to research review committees, VHA officials, and ORO. These requirements do not alter or replace any additional requirements for reporting such events to other internal or external entities as mandated by law, regulation, policy, or agreement.

Paragraph 9 deals specifically with Research Information Security.

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1. Applicable Events in the VAMHCS Research Safety and Security Program (RSSP) must be reported to the SRS, MCD and ORO in compliance with VHA handbook 1058.01, as outlined in the tables below. VAMHCS ACOS/R&D and HARPO must also be notified as outlined in the tables below.
    - a. The incidents below are not subject to the SRS deliberation required by ORO for research laboratory safety incidents (Process Module 043). However, the SRS must carefully review all incidents involving research laboratory security and determine if any changes in the Research Security Plan or other local policies are necessary to prevent future occurrences.
  2. The R&D Service/HARPO prepares any written reports from the Director to ORO. VAMHCS templates for memo/letter formats must be followed.
  3. VA personnel, including WOC and IPA appointees, must ensure *notification of the ACOS/R&D, Deputy ACOS/R&D, SRS Chair, and HARPO* of any physical security concerns that pertain to research laboratories or other areas used exclusively for research as below:

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	<b>Event</b>	<b>Method</b>	<b>Timing</b>	<b>How</b>
1	Any intrusion, physical security breach, break-in, or other security violation that occurs in dedicated research areas	<b>oral</b> notification of the VAMHCS Police Service	<b><i>Immediately</i></b> after becoming aware	<ul style="list-style-type: none"> <li>Also notify ACOS/R&amp;D and HARPO <b>immediately</b></li> </ul>
		<b>written</b> notification	within <b>5 business days</b> of the event	<ul style="list-style-type: none"> <li>Cc ACOS/R&amp;D, DACOS, SRS Chair and HARPO</li> </ul>
2	Any finding by any entity other than ORO of noncompliance with research laboratory security requirements.	<b>written</b> notification	Within <b>5 business days</b> after becoming aware	<ul style="list-style-type: none"> <li>Also notify ACOS/R&amp;D, DACOS, and HARPO immediately</li> <li>Contact SRS Chair directly or through ACOS/R&amp;D or HARPO.</li> <li>Emails should Cc SRS Chair, ACOS/R&amp;D, DACOS, and HARPO.</li> <li>Written report to SRS</li> </ul>
3	Any unplanned suspension or termination of research by the ACOS/R&D or another facility official due to concerns about research laboratory security			
4	Any other deficiency that substantively compromises the effectiveness of the facility's research laboratory security program			
5	Events/incidents in other areas whose use for VA research is limited or infrequent	<ul style="list-style-type: none"> <li>Same as above, as applicable</li> <li>Contact SRS Chair, ACOS/R&amp;D, DACOS or HARPO for questions or guidance.</li> <li>Emails should Cc SRS Chair, ACOS/R&amp;D, DACOS, and HARPO.</li> </ul>		

- The ACOS/R&D must notify the VA facility Director and the VA Police Service (if not previously notified) within 5 business days after becoming aware of any situation described above. Concurrent notification must be provided to other authorities in accordance with other VAMHCS local reporting requirements.
- The VA facility Director must report the incident to ORO within 5 business days of being notified. Related reports to ORO must include all findings and all pertinent documentation. The HARPO prepares letter or memorandum and submits to Executive Suite for review and signature. An encrypted email is sent to ORO RSAW workgroup: [ororsaw@va.gov](mailto:ororsaw@va.gov) with copies to COS, ACOS/R&D, DACOS, RCO, VISN 5 Action Group.
- See VAMHCS R&D Service SOP 151/R&D-003, "Security Plan", for details on VAMHCS laboratory security requirements.

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