Centers for Disease Control and Prevention Center for Preparedness and Response



<u>CDC Import Permit Program (IPP)</u> Overview of Risk-Based Inspections & What to Expect During a Site Visit

2019 CDC Import Permit Program

Webcast

## **CDC Import Permit Inspection Overview**

## **CDC Import Permit Regulations**

- In 2013, the regulations were amended, 42 CFR 71.54(h)
  - Issuance of a permit may be <u>contingent upon an inspection</u> of the importer's facility by the CDC to evaluate whether the importer's biosafety measures (e.g., physical structure and features of the facility, and operational and procedural safeguards) are commensurate with the hazard posed by the infectious biological agent, infectious substance, and/or vector, and the level of risk given its intended use.



• Over 270 inspections have been conducted to date.

## Number of Permits Issued vs Number of Inspections

 CDC IPP issues roughly 2,000 import permits per year and inspects roughly 40 facilities per year using a risk-based approach.



## **Risk-Based Inspection Selection Criteria**

- Guided by quantitative and objective scoring derived from the application and other sources.
  - Factors include:
    - Risk group(s) of the agent(s) requested
    - Biosafety level(s) reported
    - Culture or propagation activities
    - Work with animals or arthropods
      - History of importation or shipping non-compliance (e.g., CDC Quarantine Stations, U.S. Customs and Border Protection, U.S. Department of Transportation)
    - Registration of laboratories with the Federal Select Agent Program (FSAP)



FEDERAL SELECT AGENT PROGRAM



## **Common Agents Requests & High-Risk Agents**

Most commonly imported agents (2017):			
1) Human Immunodeficiency Virus	11) Adenovirus		
2) Escherichia coli	12) Klebsiella species		
3) Zika virus	13) Plasmodium species		
4) Hepatitis C virus	14) Shigella species		
5) Hepatitis B virus	15) Enterobacter species		
6) Dengue virus	16) Mycobacterium tuberculosis		
7) Cytomegalovirus	17) Campylobacter species		
8) Streptococcus species	18) Epstein-barr virus		
9) Salmonella species	19) Proteus species		
10) Staphylococcus species 20) Enterococcus species			

Example high-risk agents for inspection consideration			
Mycobacterium tuberculosis	MERS-CoV	Zika virus	
Chikungunya virus	Yellow fever virus	Hantaviruses	

## **Biosafety Levels Inspected: 2013-2018**



• Some inspections included multiple safety levels.

### **IPP Inspections Conducted: 2013-2018**



## What to Expect During a Site Visit

## **Scope of IPP Inspections**

- Verify that biosafety measures are appropriate for the risks of the agent and work.
  - Are the practices and facility in line with nationally recognized standards of practice (i.e., *Biosafety in Microbiological and Biomedical Laboratories* (BMBL) 5<sup>th</sup> edition)?
- Verify the information submitted on the application.
  - Does the applicant have the safety level, primary containment, and personal protective equipment described on the application?
  - Is the work within the scope described on the application?
- Has the permittee complied with the conditions of the permit?



### https://www.cdc.gov/cpr/ipp/inspection/index.htm

## **Typical Site Visit Time Frame & Outline**

- Initial notice of inspection sent roughly 30 days in advance
  - Unannounced inspections can occur
- Generally within the hours of 9:00 AM 5:00 PM
- Opening meetings and presentations
- Laboratory and storage area tours
- HVAC and support space tours
- Interviews with staff (1-6 staff members)
- Document review
  - Plans, standard operating procedures (SOPs), training materials
  - Facility performance verifications
  - Training records
- Closeout meeting



For questions regarding this inspection please contact Glen DeGruy (Team Leader/Import Permit Program) at 404.718.2053.

Thank you,

Centers for Disease Control and Prevention Import Permit Program Ph: 404.718.2077; Fax: 404.718.8333 importpermit@cdc.gov www.cdc.gov/od/eaipp

> Department of Health and Human Services Centers for Disease Control and Prevention (CDC) Drivinon of Select Agents and Tuxins (DSAT) Adapta. Generic

Date: December 11, 2014

Subject: BSL-3/ABSL-3 HVAC and Facility Verification

The Center for Disease Control and Prevention (CDC)'s Import Permit Program regulates the importation of infectious biological agents, infectious substances, and vectors of human disease into the United States.

### Authority:

Under the authority of section 361 of the Public Health Service Act (42 U.S.C. §264), the Secretary of the U.S. Department of Health and Human Services is subservice to make and enforce regulations to prevent the introduction, transmission, or spread of communicable diseases from foreign Quaranties into the United Status and from one State in may other State. The Foreign Quaranties regulations (42 UTR Part 71) set forth provisions to prevent the United States are provided by the provision of the imperiation of informabiological agents, infections substances and vectors (42 UTR §71,54), requiring persons to obtain a permit sissed by the CDE Vector empring. of durity burg persons to obtain

Section 71,54(b)(f) of those regulations provides that the a person may not import into the United States any infectious biological agent, infectious substance, or vector unless the imported has implemented biosificity measures commensurate with the hazard posed by the infectious biological agent, infectious substance, and/or vector to be imported, and the level of risk given its intended use.

Biological safety exhincts protect laboratorians by providing primary containment of microbiological hazards, through high efficiency particulate air (IETPA) futurians of cabinet air and the presence of either a protective air curtant, or a physical barrier, between the cabiner's work space and the laboratory room. Secondary containment of hazards is achieved by separating the laboratory from non-laboratory areas or from the outside. The heating, venthalion and air conditioning I(IVAC) system edgins separates potentially contaminanted laboratory air from areas outside the laboratory by maintaining the BSL-3/ABSL-3 areas at negative pressure to adjacent areas, by perventing re-iccuration of laboratory cabinas air is observed by airbox building, and by employing special engineering controls that prevent the occurrence of laboratory airbox versults to outside the containment boundary.

Given the significant role that biological safety cabinets HVAC systems play in biological risk control, it is important that there devices and systems be used and maintained in accordance with their design specifications. The following naturement provides the policy of the CDC. Import Permit Program regarding the maintenance of biological cabinets and laboratory HVAC systems.

1. Policy Statement, BSL-3/ABSL-3 HVAC Verification:

## **Post Inspection Correspondence**

- An inspection report is issued within 30 business days.
- Documented corrective actions may or may not be required.
- A response is due within 30 business days.
- Additional requests are sent until all observations requiring corrective action have been adequately resolved.

1	DEPARTMENT OF HEALTH AND HUMAN SERVICES	Public Health Servic
\$11		Centers for Disease Control
-U-		and Prevention (CDC
æ		Atlanta, GA 30329-402
		October 28, 201
Applic	ant Name	
Addre	ss Line 1	
Addre	ss Line 2	
RE:	Entity Inspection Report	
	Entity Name (Applicant: Applicant Name)	
Dear	applicant name:	
An ins	pection of your facility was scheduled in response to your reque	st to import and conduct work with
list inf	ectious agent(s). The purpose of the Centers for Disease Control	and Prevention (CDC) Import
Permi	t Program (IPP) visit was to assess whether the importer's facilit	y has implemented biosafety
meas	ures commensurate with the hazard posed by the infectious biol	ogical agent, infectious substance,
and/o	r vector to be imported, and the level of risk given its intended us	ił.
Inspe	ctors from the CDC IPP visited your facility located at Street add	ress, City, State on date of
inspec	ction. A list of laboratories inspected on these dates is on file with	h this letter at CDC.
The fo	lowing personnel from the CDC IPP inspected the facility	
Le	ead, Lead Inspector	
C	o-inspector	
A list	of individuals from entity's name present was provided to you at	the close of the inspection.
The re	egulations for the importation of infectious biological agents, infe-	ctious substances, and vectors (42
CFR 1	1.54) require the implementation of biosafety measures comme	nsurate with the hazard posed by
the inf	fectious biological agent, infectious substance, and/or vector to b	e imported, and the level of risk
given	its intended use. See 42 CFR 71.54(b)(3). To determine whethe	r your facility meets this regulatory
requir	ement, CDC uses the nationally recognized biosafety guidelines	contained in the Biosafety in
Microl	biological and Biomedical Laboratories (BMBL,	
http://	www.cdc.gov/biosafety/publications/bmbl6/index.htm).	
Asad	condition of being issued an import permit, the importer (applicar	t name) at organization must
addre	ss each of the items described in Attachment 1, including the sp	ecific actions or changes to be
adopt	ed. A detailed response should be received by this office no late	r than 30 calendar days from
receip	t of this report. Send an electronic copy of your response to lead	inspector at
impor	tpermit@cdc.gov.	
Since	rely.	
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## **Inspection Observations**

# Biosafety/Containment Findings From Inspections: 2013-2018

- Inspections that required corrective actions = 94%
- Average number of inspection observations = 6.5
  - Deficiencies in biosafety
  - Inaccurate applications
- Range of inspection observations
  - Minimum = 0
  - Maximum = **33**





Note: Inspection findings can be grouped together if there are multiple deficiencies due to a common observation. Formatted reports may show a lower number of "observations."

# Biosafety/Containment Findings From Inspections: 2013-2018

• Top 10 BSL-2 inspection findings:

#	BSL-2	Standard
90	A9	Laboratory signage
77	B1	Advising personnel of hazards and entry requirements
45	A11	Training and information on personal health status
33	C3	Eye protection and decontamination before reuse
24	A2	Hand washing
21	C1a	Use of Biological Safety Cabinet (BSC) for procedures with aerosol/splash potential
20	D1	Self-closing lab doors and locks (according to policies)
19	C4c	Hand washing / glove use
18	C2	Use of laboratory coats/gowns
14	A5d	Broken glassware clean up procedures/equipment

# Biosafety/Containment Findings From Inspections: 2013-2018

• Top 10 BSL-3 inspection findings:

#	BSL-3	Standard
65	A9	Laboratory signage
53	B1	Advising personnel of hazards and entry requirements
50	D9	Air flow shall not be reversed under failure conditions
36	C3	Eye protection and decontamination before reuse
30	A11	Training and information on personal health status
28	D15	Documented annual re-verification of BSL-3 parameters
26	D3	Laboratory can be easily cleaned/decontaminated
24	B10	Use of BSC/physical containment for manipulations
14	D9a	Visual monitoring device to confirm directional air flow
14	D2	Hands-free sink for hand washing

## **Application Inaccuracies: 2016-2018**

- Inspections allow for verification of information submitted on an application.
- Applications inspected that were inaccurate = 47%
  - In many cases, mistakes or omissions were simple errors.
  - In some cases, permittees misrepresented their facilities and capabilities.

Home Manage Templat	tas			Helio xys0@csc.govi Log out		
APPLICATION I	FOR PERMIT TO IMPORT INFECT	IOUS BIOLOGIO	CAL AGENTS IN	ITO THE UNITED STATES		
SECTION A	20191105-0516A					
SECTION B	Section A					
SECTION C	PERSON REQUESTING PERMIT IN U.S.(PERMITTEE)					
SECTION D		Primary Permitt	ee Request			
SECTION E	Primary Permitibe Request					
SECTION F	1. Primary Permittee's Last Name +	2. Primary Permittee	s Pirst Name 🜩	*		
SECTION G	Cremer	Thomas				
	4. Physical Address (NOT a post office box)	*	5. City 🛊			
	8. šisis *	7. Zlp Code #				
	Georgia					
	8. Permitter's Telephone Number +		9. Permittee's Email :	*		
	10. Will the permittee be the courier of the in	nported biological agent	7*			
	© Yes	•				
	© No					
	11. Secondary Contact's Name	12. Secondary Conta Number	ot's Telephone	13. Secondary Contact's Email		
		( ) - ext. 16. Inctitutional Biocafety Officer's Telephone Number				
	14. Institutional Biosafety Officer's Name			18. Institutional Blosafety Officer's Email		
		( ) - ext.				
Additional Authorized User(s)						
	Last Name	Fi	rct Name			

## **Compliance Metrics**

- 12 permits have been revoked.
  - 10 permittees did not have the biosafety level, containment, or facilities as described in the application for their permit.
  - 2 permittees did not allow inspection of their facility.
- 2 permit applications were voluntarily withdrawn in response to the inspection findings.
  - Permittees were not able meet ABSL-2 or ABSL-3 facility standards.

## **Compliance Metrics**

- **2** permit applications were denied.
  - 1 permittee did not have their ABSL-3 facility constructed at the time of the inspection.
  - 1 permittee was suspended by their organization for non-compliance.
- 2 permittees were unable to adequately address all inspection observations after 1 year.
  - Inspection findings were related to deficiencies in the HVAC of BSL-3 facilities.
  - Both were placed on a watch list to prevent future issuance of permits, until corrective actions could be confirmed.

## Conclusions

- The 2013 revision to the import regulations, including an inspection provision, has made a positive impact on biosafety and public safety.
- On-site inspections by IPP benefit organizations and individual permittees to identify and develop mitigation strategies to reduce overall risk of handling these imported materials.