



## **APHL Position/Policy Statement**

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### **Psychological Evaluations of Governmental Public Health Laboratory Professionals are Unnecessary**

#### **A. Statement of Position**

The Association of Public Health Laboratories (APHL) strongly opposes the imposition of psychological evaluations or assessments of governmental public health laboratory professionals who are registered with the federal government's National Select Agent Registry Program.

#### **B. Background/Data Supporting Position**

Federal law requires that any person or entity possessing, using or transferring a Health and Human Services (HHS) select agent or toxin must have a certificate of registration from the HHS Secretary. Under the National Select Agent Registry Program, no person can be granted access to a select agent or toxin by the HHS Secretary without first undergoing a security risk assessment performed by Department of Justice's Federal Bureau of Investigation, Criminal Justice Information Service to evaluate the individual's suitability to have access to select agents.

APHL is fully confident that the operations of the National Select Agent Registry Program provide a robust examination of governmental public health laboratory professionals who have access to select agents or toxins. This program provides the cornerstone of the federal government's "efforts to improve the ability of the United States to prevent, prepare for, and respond to bioterrorism and other public health emergencies".

Furthermore, standard employment practices utilized by public health laboratories for all of their employees including criminal and credit background checks, creating a "culture" of safety, providing effective supervisory and managerial leadership, consistently meeting the requirements of Clinical Laboratory Improvements Amendments (CLIA), regular trainings, exercises and drills, and inventory inspections, greatly contribute to biosecurity. Maintenance of federal support for all of these activities is critical to ensuring their continued effectiveness.

The imposition of an additional requirement for governmental public health laboratory professionals with access to select agents to undergo psychological evaluations or assessments would be administratively burdensome and costly and should not be pursued. Further, psychological evaluations or assessments would demand the creation of secured storage and maintenance of employee health records – a wholly new endeavor for governmental public health laboratories. If this approach is adopted, the federal government must fully fund all of the costs associated with complying with this new requirement. Any effort to impose psychological evaluations or assessments on governmental public health laboratory professionals must be preceded by a certification of these measures for those laboratory professionals by the federal government. Alternatively, additional useful information on governmental public health laboratory professionals could be obtained through the federal security clearance process.

**C. References**

National Select Agent Program web site: <http://www.selectagents.gov/index.html>

42 CFR 73, Federal Register / Vol. 70, No. 52 / Friday, March 18, 2005 / Rules and Regulations

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Recommended by: Board of Directors  
Date Submitted: June 4, 2009  
Date Approved by Board of Directors for Interim Use: June 8, 2009  
Date Approved by Membership: June 22, 2009  
Sunset Date: June 8, 2014