

## Attachment

### FY05/06 Quality Assurance Annual Report and Work Plan

#### Addendum to Region 2 Quality Management Plan

##### Introduction

The purpose of this addendum is to document the completion and implementation of the Region 2 Corrective Action Plan which resulted from the FY03 Quality Staff Quality Systems Assessment (QSA) of Region 2.

Five items were identified in the FY03 QSA and Region 2 provided and implemented corrective actions for all 5.

**Finding 1** - Region 2 lacks systematic processes for determining QA needs for extramural projects, and for reviewing and approving any necessary quality related documents.

**Corrective Action 1:** The Region will review the current QA Review process for Grants, Cooperative Agreements, and Contracts, with a focus on better defining (and tracking) the process, with an emphasis on roles and responsibilities, hopefully utilizing the Integrated Grants Management System for Grants. Any modifications will be delineated in a revision to the Region 2 Quality Management Plan. Of critical importance will be QA training for the Project Officers, stressing roles and responsibilities.

##### **QMP Addendum**

Region 2 has developed and begun implementing a 2-phase QA training Program. The QA training is mandatory for anyone who is involved in the generation and use of environmental data. This includes all Region 2 technical staff and their supervisors, for example: most people involved with projects, contracts or grants that include any monitoring, modeling or data use; people who oversee state or tribal operations; people involved with compliance evaluation.

The first phase of the training, the computer-based, on-line training, addressed the basics of QA and addressed the basic roles and responsibilities of employees. The second phase of the training, face-to-face, program-specific training, delineates and stresses roles and responsibilities of all employees, by program, involved in the generation and use of environmental data.

By way of this addendum, Section 2.2 of the Region 2 QMP, Quality System Tools, is modified to reflect the efforts of the recently implemented QA Training Program.

**Finding 2:** There are no Region-wide procedures for records management of quality related documents for both intramural and extramural agreements.

**Corrective Action 2:** In addition to the activities listed in Corrective Action 1, the Regional QA Manager will assess the existing records management processes for each program realizing the need for flexibility. These processes will be identified in the revision to the Region 2 Quality Management Plan.

**Finding 3** - Systematic planning and data quality assessment are not being performed as prescribed in the R2 Quality Management Plan.

**Corrective Action 3:** The Region will develop a process for incorporating decision-making data quality needs into the project planning process, including DQOs when appropriate, making sure that project managers and regional QA staff are included in the planning process. This process will be documented and distributed to all those developing projects for the Region (including, for example, QAPP generic formats and templates), and will be incorporated into project QA training. The Region will also develop a process for incorporating Data Quality Assessment into all projects. This process will be documented and distributed to all those developing projects for the Region (including, for example, QAPP generic formats and templates) and will be incorporated into project QA training.

### **QMP Addendum**

Region 2 does not routinely use the DQO process, and thus, the DQA process. Region 2 uses a less formal and less statistical, systematic planning process and a less formal and statistical Data Usability Assessment (DUA) process, based largely on the data quality indicators mentioned in the QSA. This issue, in fact, is the reason why Region 2 instigated the formation of the Quality Staff-led DUA Work Group, which is developing practical guidance based in part on Region 2 procedures.

While Region 2 may, over time, mature to a more probabilistic process, we are not there now. The Region 2 face-to-face training addresses the probabilistic process and encourages it, but focuses on the effective use of the indicators through the strong connection with what is needed for the decision to be made. Also for hazardous waste projects, the Region has adopted the Intergovernmental Data Quality Task Force Uniform Federal Policy for Quality Assurance Project Plans, Evaluating, Assessing, and Documenting Environmental Data Collection and Use Programs for systematic planning and data usability activities.

By way of this addendum, Section 2.2 of the Region 2 QMP, Quality System Tools, is modified to reflect the use of the probabilistic approach **or** the less statistical, systematic planning process and Data Usability Assessment (DUA) process and the Intergovernmental Data Quality Task Force Uniform Federal Policy for Quality Assurance Project Plans for hazardous waste projects. In the next revision of the Region 2 QMP (due in 2007), the DUA workgroup will have completed the guidance needed for non-statistical DUA. The 2007 Region 2 QMP will reflect this.

**Finding 4** - The Region's Quality Management Plan is inconsistent with current operations in two areas. Some QA roles and responsibilities as described in the Quality Management Plan lack specificity and hinder implementation of the quality system. In

addition, DESA's laboratory operations outside of the Laboratory Branch (e.g., mobile laboratory and air QA laboratory) are not addressed in the Quality Management Plan.

**Corrective Action 4:** The Region will clarify QA roles and responsibilities in the Quality Management Plan and in project QA training, including the understanding that the title typed on a document does not necessarily define the title of the signatory. The Region will also incorporate all laboratory operations into the Quality Management Plan.

### **QMP Addendum**

The first phase of the training identified in the response to Finding 1, the computer-based, on-line training, addressed the basics of QA and addressed the basic roles and responsibilities of employees. The second phase of the training, face-to-face, program-specific training, delineates and stresses roles and responsibilities of all employees, by program, involved in the generation and use of environmental data. Here too, the region is providing training on the adoption of the Intergovernmental Data Quality Task Force Uniform Federal Policy for Quality Assurance Project Plans for Evaluating, Assessing, and Documenting Environmental Data Collection and Use Programs for systematic planning and data usability activities, for hazardous waste projects.

**A QMP is in-place for the Brownfields Mobile Laboratory, finalized March 3, 2004.**

**A QMP is in-place for the Air QA Laboratory, finalized July 22, 2004.**

**Finding 5** - Internal Quality Assessments have not been performed.

**Regional Response:** It is recognized that internal quality assessments are important tools to evaluate implementation effectiveness

**Corrective Action 5:** The Region will schedule and track internal Quality System assessments through the QAARWP.

### **QMP Addendum**

By way of this addendum, Section 10.0 QUALITY IMPROVEMENT, of the Region 2 QMP is amended by adding a fourth paragraph as follows:

The Region 2 QA staff and management will develop a list of internal assessments to be performed during each fiscal year. These internal assessments will be performed following the principles identified in "Guidance on Technical Audits and Related Assessments for Environmental Data Operations (QA/G-7)."

