



# Quality Assurance for Contracts/Grants/Purchase Orders

Nia Wellendorf  
Aquatic Ecology and Quality Assurance Section  
October 16, 2019



# Agenda

- Review DEP Quality Assurance (QA) Authority
- QA requirements for Contracts and Grants
- QA Attachments
- QA requirements for Purchase Orders
- Contract/Grant Manager responsibilities
- Examples and Discussion



# Learning Goals

- Understand DEP QA requirements for contracts, grants, and purchase orders
- Know when to ask questions
- Know where to find the answers





# Authority and Obligation

- **Chapter 403.0623, Florida Statutes**
  - Directs DEP to “establish, by rule, appropriate quality assurance requirements for environmental data submitted to the department and the criteria by which environmental data may be rejected by the department”
- **Chapter 62-160, Florida Administrative Code**
  - DEP’s “QA Rule” contains requirements for field and lab data submitted to DEP



# Authority and Obligation

- **DEP Directive 972**
  - QA Directive establishes internal agency policy and distributed responsibility for QA throughout DEP
- **Quality Management Plan (QMP)**
  - Explains DEP's QA processes to EPA, and is a requirement for funding and delegation of federal programs to DEP



# Contract QA

## *Contracts, Grants, Purchase Orders*

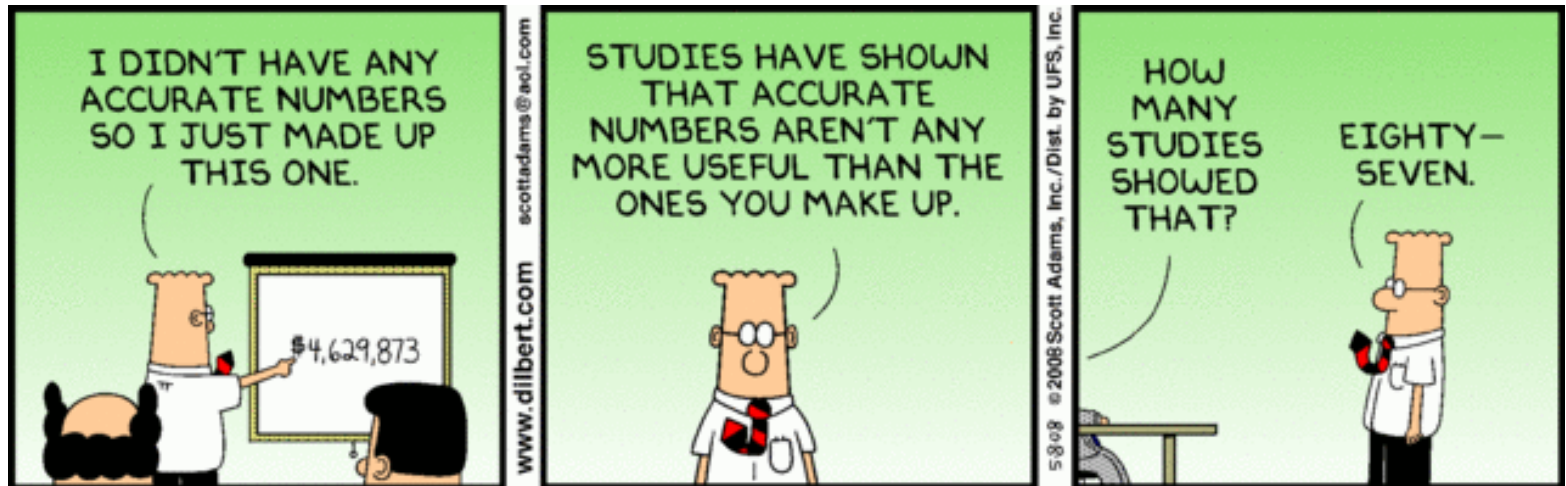
- Field and laboratory work conducted under legal agreement (contract/grant/PO) with DEP must adhere to DEP QA Rule (62-160 F.A.C.)
  - Scientific validity
  - Legal defensibility
- State \$ spent
  - DEP will use the data
  - DEP will make decisions based on the data





# Contract QA

**“Trust, but verify.” - Ronald Reagan**





# QA Process Documents

## *Contracts, Grants, Purchase Orders*

- AEQAS has provided process documents with embedded QA attachments, QA deliverables language and QA Plan templates
  - Contracts
  - Grants
  - MFMP PRs (POs)
- <https://floridadep.gov/dear/quality-assurance/content/quality-assurance-resources>
- Linked in grant writer manual

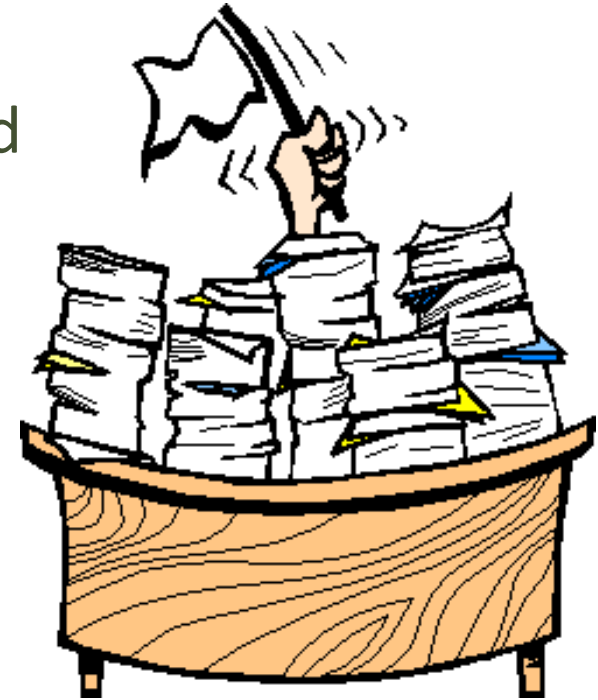




# Manager Responsibilities

## *Contracts, Grants*

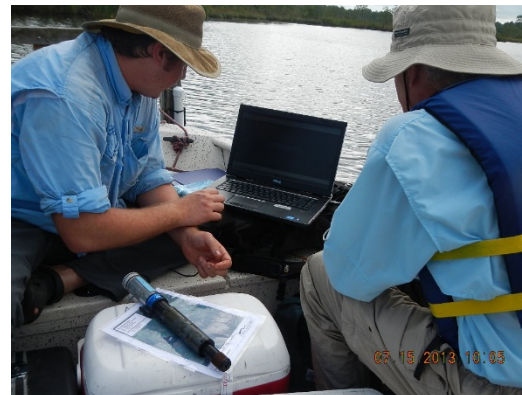
- Discuss field and lab work with contractor/grantee during project initiation
- Decide whether project requires Standard or Research QA Attachment, and include in agreement
- Provide Research or Standard QA Plan template to contractor/grantee
- Review and approve QA Plan deliverable and other deliverables for adherence to QA requirements
- Request help from AEQAS as needed





# QA for Field Sampling

- Use appropriate equipment
- Preserve samples correctly
- Meet holding times, as required in DEP SOPs
- Record all required information to be kept with the sampling record
- Make sure field meters are reading accurately





# QA for Lab Analysis

- Hold certification from DOH for specific test methods
- Run required blanks and standards
- Have results reviewed by a second analyst
- Report results with appropriate qualifier codes, as required in the QA Rule



A – Value reported is the arithmetic mean (average) of two or more determinations.  
U – Indicates that the compound was analyzed for but not detected.  
I – The report value is between the laboratory method detection limit and the laboratory quantitation limit.  
B – Results based upon colony counts outside the acceptable range.



# QA Attachment (Exhibit D) Contents

## *Contracts, Grants, Purchase Orders*

- Laboratory Analysis and Field Collection Requirements
- Reporting, Documentation, and Records Retention
- Audits
  - Technical Audits
  - Initial and Ongoing Planning Review Audits
  - Statement of Usability
- QA Plan (deliverable for contracts and grants, info needed ahead for POs)

**Required if work includes field or lab sample measurements**



# QA Attachment (Exhibit D)

## *Contracts, Grants, Purchase Orders*

- Standard QA Attachment
  - Standard accepted methods used
  - All **DEP SOP** requirements apply
  - Labs must be **certified** by DOH ELCP
  - Use Standard QA Plan Template
- Research QA Attachment
  - **Non-standard or “research”** sampling procedures
  - Lab methods that are non-standard and **not typically certified** by DOH-ELCP
  - Data not for regulatory use
  - Use Research QA Plan Template



# Who Conducts QA Review?

- QA Review prior to agreement execution *is required* to ensure appropriate QA requirements included
- Triggers for review
  - Contracts CIF I includes QA approval
  - Grants has no formal trigger
- AEQAS conducts review for DEAR, OEP, Parks
- DWRA – QA officer conducts review
- Others?





# “Standard” Examples

- Florida Parks Service
  - Wastewater permit-required monitoring for WWTP
  - Bathing beach bacteria monitoring
  - Public drinking water system monitoring for bacteria and nitrate
- All labs must be certified for methods, and DEP SOPs must be followed for collection





# “Research” Examples

- Office of Resilience and Coastal Protection
  - Marsh vegetation monitoring at a National Estuarine Research Reserve
  - Coral disease monitoring and lab testing to determine disease cover and evaluate possible remedies
- Lab certification and DEP SOPs not applicable, program procedures must be provided



# Discussion Example 1

- Contract with a county to conduct water quality sampling and analysis for DEP impaired waters assessment and algal bloom detection
  - Include QA requirements? **Yes**
  - Standard or Research? **Standard**
  - Need detailed list of methods? **Yes, even if it's a list of the DEP SOPs they will follow.**



# Discussion Example 2

- Grant using legislative appropriation to evaluate potential treatments for algae blooms. This project is being done by a renowned scientist and involves lab tests with an experimental chemical additive.
  - Include QA requirements? **Yes**
  - Standard or Research? **Research**
  - Need detailed list of methods? **Yes, and may include DEP and non-DEP methods.**



# Purchase Orders

- AEQAS conducts QA review and approval in MFMP for all POs with field sampling or lab analysis
  - Triggered by commodity type
- Standard or Research QA Attachment added to PO by AEQAS
- During negotiations...
  - Review the QA requirement with the supplier, make sure all parts are understood. Contact AEQAS with questions.
  - For research projects, project info must include a description about proposed methodology.



# MFMP QA Attachments

1. Standard QA Requirements- when DEP SOPs are used and lab is FDOH certified, typically for activities conducted for compliance.
2. Research QA Requirements- when sampling activities will **NOT** be conducted according to DEP SOPs and lab analyses will **NOT** be performed by a certified lab. Research approach is acceptable if data will not be used for regulatory decisions.

*If the proposed scope of work does not appear to conform to either of those choices, contact AEQAS for review and approval for edited QA requirements.*



# MFMP: Sufficient QA Information

- For Standard Sampling and/or Analytical Services
  - List each organization providing services
  - Indicate the specific sample collections or analyses supplied
  - List the test methods and include the certification number for the lab.
  - If more than one matrix, the above info should be listed for each sample matrix.



# MFMP: Sufficient Information (cont.)

- For Research Projects, provide the following in the line item description or attached Plan of Study or Scope.
  - Purpose and intended use of data
  - Description of work to be done
  - Data reporting and storage procedures
  - Documentation to be provided to the department
  - Training required to conduct work
  - Experimental design details, including sampling sites, populations, organisms, or analytes to be investigated, and sampling and/or analytical schedules;
  - **Sampling and analytical methods**
  - **QC activities**
  - Evaluation of the research project design to meet objectives
  - Statistical and/or other procedures and criteria for evaluation of data





# Discussion Example P01

- PO for FWC to conduct fish surveys to determine if fish are affected by algal blooms.
  - Include QA requirements? **Yes**
  - Standard or Research? **Research**
  - Need detailed list of methods? **Yes, likely FWC methods.**
  - What questions might you ask? **Are they also collecting any water samples, and by what methods?**



# Discussion Example P02

- PO for a consulting firm to collect bathing beach samples for bacteria, to report to the Department of Health.
  - Include QA requirements? **Yes**
  - Standard or Research? **Standard**
  - Need detailed list of methods? **Yes**



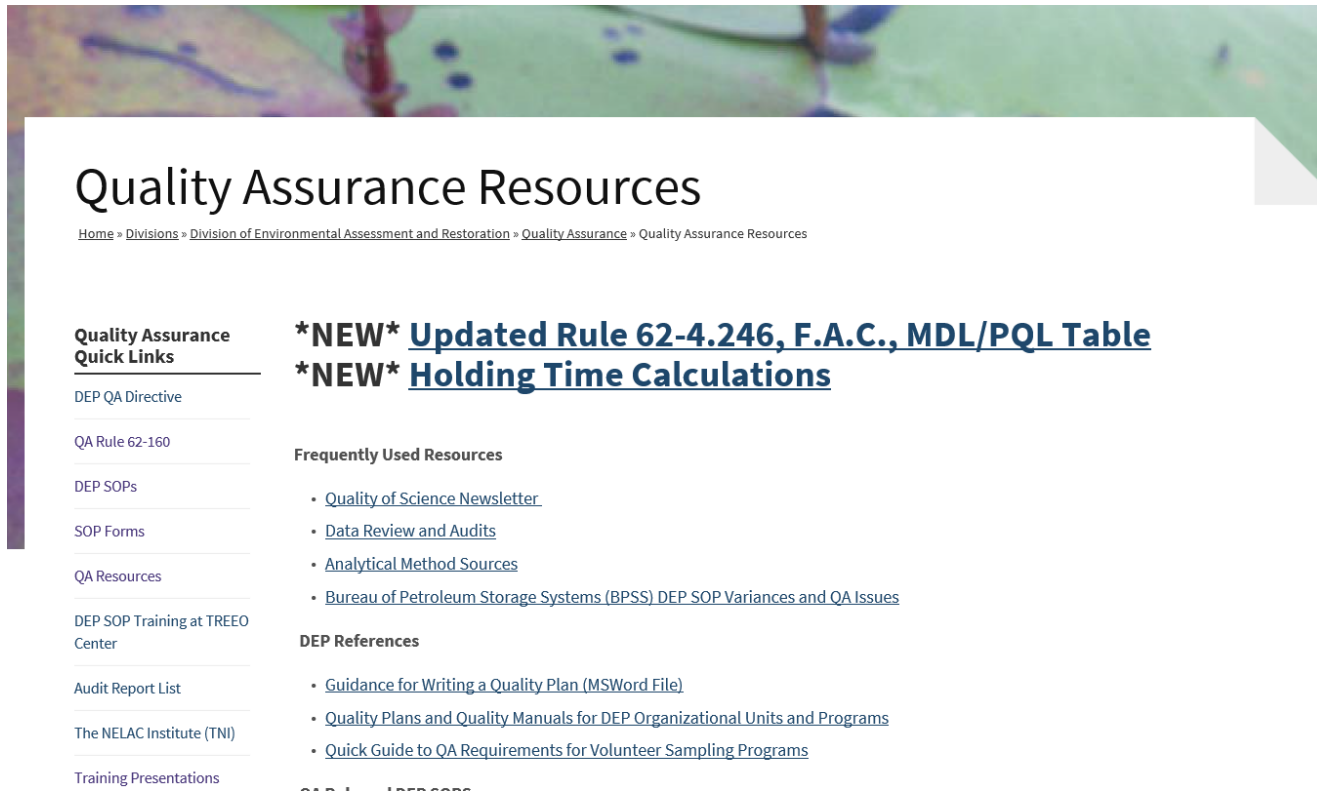
# Discussion Example P03

- PO to purchase sampling equipment from a Scientific Products company.
  - Include QA requirements? **No, because this PO does not include sample collection or analysis services.**



# Where can I find this stuff?

<https://floridadep.gov/dear/quality-assurance/content/quality-assurance-resources>



**Quality Assurance Resources**

[Home](#) » [Divisions](#) » [Division of Environmental Assessment and Restoration](#) » [Quality Assurance](#) » Quality Assurance Resources

**Quality Assurance Quick Links**

- [DEP QA Directive](#)
- [QA Rule 62-160](#)
- [DEP SOPs](#)
- [SOP Forms](#)
- [QA Resources](#)
- [DEP SOP Training at TREEO Center](#)
- [Audit Report List](#)
- [The NELAC Institute \(TNI\)](#)
- [Training Presentations](#)

**\*NEW\* [Updated Rule 62-4.246, F.A.C., MDL/PQL Table](#)**

**\*NEW\* [Holding Time Calculations](#)**

**Frequently Used Resources**

- [Quality of Science Newsletter](#)
- [Data Review and Audits](#)
- [Analytical Method Sources](#)
- [Bureau of Petroleum Storage Systems \(BPSS\) DEP SOP Variances and QA Issues](#)

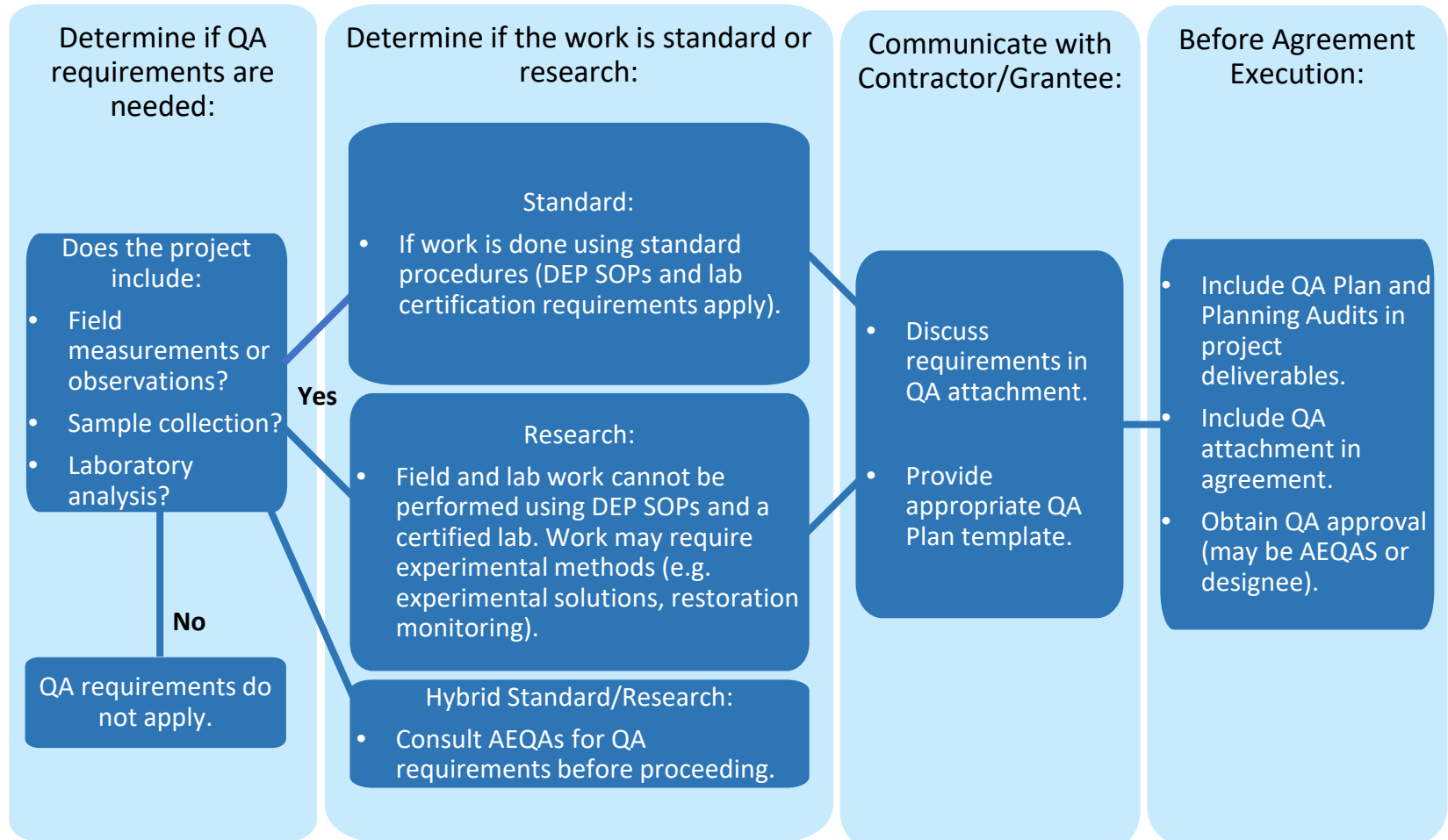
**DEP References**

- [Guidance for Writing a Quality Plan \(MSWord File\)](#)
- [Quality Plans and Quality Manuals for DEP Organizational Units and Programs](#)
- [Quick Guide to QA Requirements for Volunteer Sampling Programs](#)



# Manager Responsibilities

## ***Before Agreement Execution***





# Manager Responsibilities

## ***After Agreement Execution*** \*

### Deliverables:

- Review QA plan for required elements per the Agreement (if needed, return to vendor for revision before approval to do work).

### Audit Report Requirement:

- Receive initial planning audit report from the contractor.
- Verify that work is being done per approved QA plan.

### Review of Project Deliverables:

- All projects:
- Ensure that project deliverables adhere to the agreement.
  - Verify that work was done as described.
  - Verify that all data were delivered.

#### Standard:

- ✓ Followed DEP SOPs.
- ✓ Used a certified lab to conduct analyses.
- ✓ Achieved required MDLs.
- ✓ Evaluate data qualifiers (may indicate quality control failures).
- ✓ Ensure that project goals were met.

#### Research:

- ✓ Followed methods and procedures as described in the QA Plan.

\*Request review assistance from AEQAS or appropriate department subject matter experts as needed.



# Audits of Contracted Work

- Initial Planning Review Audit (not required for POs)
  - Once work has begun, contractor/grantee shall submit an evaluation of how well the work aligns with the QA Plan
- Ongoing Planning Review Audits (not required for POs)
- Technical Audits
  - DEP may audit contractors/grantees at any time
  - Contact AEQAS for help if you think an audit is needed





Questions?





# Evaluations

Thank you!!

Nia Wellendorf (Nijole.Wellendorf@floridadep.gov)  
Quality\_Assurance@floridadep.gov