



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 28 2011

OFFICE OF THE  
SCIENCE ADVISOR

**MEMORANDUM**

**SUBJECT:** Policy to Assure Competency of Laboratories, Field Sampling, and Other Organizations Generating Environmental Measurement Data under Agency-Funded Acquisitions

**FROM:**

Paul T. Anastas  
EPA Science Advisor

A handwritten signature of Paul T. Anastas in black ink, written over the printed name and title.

**TO:**

Assistant Administrators  
Regional Administrators

Attached is a new Agency Policy Directive titled, *Policy to Assure Competency of Laboratories, Field Sampling, and Other Organizations Generating Environment Measurement Data under Agency-Funded Acquisitions*. This Policy Directive was developed by the Forum on Environmental Measurements (FEM) in consultation with the Office of Acquisition Management and the Office of General Counsel, and has cleared intra-agency review under the auspices of the FEM.

The purpose of this memorandum is to convey EPA policy requiring that organizations (e.g., laboratories, field sampling and measurement) generating environmental data under Agency-funded acquisitions submit documentation of their competency, which may include participation in applicable certification and/or accreditation programs. All organizations performing environmental analysis for the Agency shall demonstrate their qualifications in the field(s) of analyses to be conducted, prior to performing such analyses.

This policy will be available on the FEM website at: <http://www.epa.gov/fem>. Please disseminate this information to your respective staff for immediate use. If you have any questions, please contact me or have your staff contact Lara Autry, FEM Executive Director, at (919) 541-5544.

cc: STPC Members

# **POLICY TO ASSURE COMPETENCY OF ORGANIZATIONS GENERATING ENVIRONMENTAL MEASUREMENT DATA UNDER AGENCY-FUNDED ACQUISITIONS**

*Agency Policy Directive Number FEM-2011-01*

## **PURPOSE**

This document establishes the U.S. Environmental Protection Agency's (EPA's or the Agency's) policy requiring that organizations (e.g., laboratories, field sampling and measurement) generating environmental data<sup>1</sup> through measurement under Agency-funded acquisitions must submit documentation of their competency, which may include participation in applicable certification and/or accreditation programs.

## **EFFECTIVE DATE**

This Policy is effective for five years from February 22, 2011. The Policy shall be reviewed prior to its effective term, and will either be reissued without revision, reissued with revisions, or rescinded.

## **APPLICABILITY**

This Policy applies to all EPA programs (e.g., Program Offices, Regional Offices, Laboratories) and their sub-programs responsible for evaluating, issuing, and/or managing Agency acquisitions such as purchases, contracts and contract work assignments. This is an additional requirement to be implemented by the project officers across the Agency for acquisitions generating environmental data, but in no way does this policy prohibit an Agency program from placing additional requirements or stipulations to meet the needs of their work being performed.

The scope of this Policy encompasses organizations which shall generate environmental data under:

- New Agency acquisition requests for proposals (RFPs)
- New approved purchases, contracts, contract work assignments/task orders, etc.

## **BACKGROUND/AUTHORITY**

The EPA Science Policy Council<sup>2</sup> established the Forum on Environmental Measurements (FEM) as a standing committee of senior EPA managers who provide the Agency and the public

---

<sup>1</sup> As defined in the *US Environmental Protection Agency Quality Policy* (CIO 2106.0; 10/20/08), environmental data include any measurements or information that describe environmental processes, location, or conditions; ecological or health effects and consequences; or the performance of environmental technology.

<sup>2</sup> In July 2010, the Science Policy Council was reconstituted as the Science and Technology Policy Council (STPC) to reflect Administrator Lisa Jackson's strong interest in promoting technology innovation to achieve environmental and public health goals.

with a focal point for addressing measurement, monitoring, and laboratory issues with multi-program impact. Since the FEM's inception in April 2004, it has been a primary goal of the Forum to promote national accreditation. Accreditation is a means to ensure that organizations performing environmental data operations are technically competent and have effective quality system management, enabling them to generate valid environmental measurement data. After years of working with communities that operate accreditation programs and encouraging private, public, and State programs to be accredited, the Agency issued a policy to assure the competency of EPA laboratories in 2004 <http://www.epa.gov/fem/pdfs/labdirective.pdf>.

Another FEM goal is consistency with other federal agencies' accreditation practices. This policy has been developed to promote the use of accredited organizations, if available, for any applicable work performed. The project officer shall insert the appropriate level of quality standards, such as accreditation and/or certification for the Higher-Level Contract Quality Requirement (i.e., 48 CFR Parts 46 and 52) in solicitations and contracts when the inclusion of this policy is appropriate. Alternatively, the burden of demonstrating the qualifications of an organization shall fall on the Agency program responsible for funding the data generation. This policy also does not replace any requirements, such as general acquisition information or quality assurance documentation, nor does it prohibit an Agency program from placing additional requirements or stipulations on an organization to meet the needs of the work being sought.

### **POLICY or (REQUIREMENTS)**

Organizations performing environmental analysis for the Agency shall demonstrate their qualifications in the fields of analyses to be conducted, prior to performing such analyses. Where accreditation or certification is available for those fields of analysis, organizations may submit documentation of existing accreditations or certifications. Accreditation/ certification granted by an organization that accredits environmental data operations to an international consensus standard, or a state accreditation or certification program acceptable to EPA, or the contracted laboratory's participation in the EPA Contract Laboratory Program for those fields of analyses, shall be valid at the time of award and must be sustained through the life of the period of performance. If accreditation/ certification is suspended or revoked at any time during the period of performance, the EPA project officer must be notified immediately to ensure any potential impact to the scope of work being performed is addressed accordingly.

### **REFERENCES**

- 48 CFR 46 Higher-level contract quality requirements, [http://www.epa.gov/quality/qa\\_cfrs.html#48PART46](http://www.epa.gov/quality/qa_cfrs.html#48PART46)
- Quality Specifications for Solicitations and Contracts <http://intranet.epa.gov/quality/contracts/>
- EPA Contract Management Manual [http://oamintra.epa.gov/files/OAM/cmm\\_0\\_0.pdf](http://oamintra.epa.gov/files/OAM/cmm_0_0.pdf)
- EPA CIO 2105.0 Policy and Program Requirements for the Mandatory Agency-wide Quality System, <http://www.epa.gov/irmpoli8/ciopolicy/21050.pdf>
- FEM Lab Accreditation Policy, [http://www.epa.gov/fem/lab\\_comp.htm](http://www.epa.gov/fem/lab_comp.htm)