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

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 Environmental 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\(^1\) 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be reviewed prior to its effective term, and will either be reissued without revision, reissued with revisions, or rescinded.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\(^2\) established the Forum on Environmental Measurements (FEM) as a standing committee of senior EPA managers who provide the Agency and the public

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\(^1\) 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.

\(^2\) 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

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 the 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

- Quality Specifications for Solicitations and Contracts http://intranet.epa.gov/quality/contracts/
- FEM Lab Accreditation Policy, http://www.epa.gov/fem/lab_comp.htm