Quality Management Plan

Water Protection Division

Emerging Contaminants Program

Water Protection Division
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Quality Management Plan

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Note: This QMP is reviewed annually for content relevance and clarity.

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0	2/06/2025	B. Anderson C. Trueblood	New Quality Plan Management for the emerging Contaminant Program under Water Protection Division at New Mexico Environment Department.

Note: This QMP is reviewed annually for content relevance and clarity.

List of Abbreviations AND Acronyms

ASD	Administrative Services Division
AWIA	American Water Infrastructure Act
CFR	Code of Federal Regulations
DFA	Department of Finance and Administration
DoIT	Department of Information Technology
DWB	Drinking Water Bureau
ECP	Emerging Contaminants Program in Small or Disadvantaged Communities
IT	Information Technology
NM	New Mexico
NMAC	New Mexico Administrative Code
NMED	New Mexico Environment Department
NMSA	New Mexico Statutes Annotated
OIT	Office of Information Technology
PWS	Public Water System
QA	Quality Assurance
QAM	Quality Assurance Manager
QAPP	Quality Assurance Project Plan
QC	Quality Control
QMP	Quality Management Plan
SDWA	Safe Drinking Water Act
SDWIS	Safe Drinking Water Information System
SOP	Standard Operation Procedure
U.S. EPA	United States Environmental Protection Agency
WPD	Water Protection Division (NMED)

Note: This QMP is reviewed annually for content relevance and clarity.

Essential Definitions

Environmental Information— Includes data and information that describe environmental processes or conditions. Examples include but not limited to:

- Direct measurements of environmental parameters or processes.
- Analytical testing results of environmental conditions.
- Information on physical parameters or processes collected using environmental technologies.
- Calculations or analyses of environmental information.
- Information provided by models.
- Information compiled or obtained from databases, software applications, decision support tools, websites, existing literature, and other sources.
- Development of environmental software, tools, models, methods, and applications.
- Design, construction, and operation or application of environmental technology.

Environmental Information Operations (EIO)—A collective term for work performed to collect, produce, evaluate, compile, or use environmental information and the design, construction, operation, or application of environmental technology.

Emerging Contaminants Program Team—Consists of ECP Manager and staff in the ECP, water professional III, engineer professional I, program coordinator II, sampler, and data analyst,

Must, Shall, Will—Denotes mandatory requirements.

Quality—The totality of processes, procedures, features, and characteristics of a product or service that depend on its ability to meet the stated or implied needs and expectations of the user.

Quality Assurance (QA)—Management of an integrated system of activities involving planning, implementation, documentation, assessment, reporting, and quality improvement to ensure that a process, item, or service is of the type and quality needed and expected by the organization.

Quality Control (QC)—The overall system of technical activities that measures the attributes and performance of a process, item, or service against defined standards to verify that they meet the stated requirements; operational techniques and activities that are used to fulfill requirements for quality.

Quality Assurance Manager (QAM)—The individual designated as the manager who has oversight authority and responsibilities for planning, documenting, coordinating, and assessing the effectiveness of the Quality Program for ECP.

Quality Assurance Project Plan (QAPP)—A planning document related to a project that describes in comprehensive detail the necessary QA/QC requirements and other technical activities that must be

implemented to ensure that the results of the work performed will satisfy the stated performance and acceptance criteria.

Quality Management Plan (QMP)—A formal document that describes a Quality Program in terms of the organizational structure, functional responsibilities of management and personnel, lines of authority, and required interfaces for those planning, implementing, and assessing all activities conducted.

Quality Program—The totality of management controls, processes, and documentation in planning, implementation, and assessment for ensuring the quality of environmental information operations products and services.

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1 QUALITY MANAGEMENT AND ORGANIZATION

1.1 PURPOSE

This Quality Management Plan (QMP) describes the organizational structure, roles, and responsibilities within the Water Protection Division Quality Program. The QMP is the guidance manual the Emerging Contaminants Program (ECP) uses to design, document, and implement ECP's Quality Program.

The Quality Program includes the process of planning, implementing, and assessing the quality assurance, quality controls, and standard operations within our federally supported programs ensuring environmental information operations products and services are of known and documented quality and adequate for its intended use.

The QMP supports strategic goals to fulfill the New Mexico Environment Department's mission to protect, preserve, and improve New Mexico's drinking water quality through compliance of the "Safe Drinking Water Act" and by adopting quality policies and procedures of the United States Environmental Protection (EPA) Quality Program required nation-wide for State Quality Programs.

1.2 APPLICABILITY

The achievement of quality in environmental programs is the responsibility of all ECP staff, external contractors, and other applicable entities whose work is directly related to the collection, analysis, and use of environmental data for New Mexico regulatory environmental programs. The work conducted on behalf of EPA is bound by all, or part, of the requirements delineated in this QMP as applicable.

1.3 QUALITY STATEMENT

The New Mexico Environment Department (NMED) Water Protection Division (WPD) is strongly committed to sound science and Quality Assurance (QA) practices, and to the oversight and requirements for quality management activities within our federally regulated programs. To ensure accurate and precise collection of environmental data, documentation, and data evaluation ECP staff are responsible for conducting required Quality Assurance/Quality Controls (QA/QC) as described in this QMP.

Environmental data is critical to environmental planning and decision-making concerning management of the environment and risk reduction. It is pertinent that decision makers know the environmental data generated by ECP is accurate and precise when making these decisions.

The ECP Quality Program policy aims to meet strategic planning and priority goals for quality assurance management, thus ensuring deliverance of safe, clean, drinking water to New Mexico citizens. This ensures the protection of drinking water systems through prudent compliance of the "Safe Drinking Water Act" and New Mexico "Water Quality Act" drinking water regulations.

The intended use of environmental data will be defined before the collection efforts or other activities begin. As a result, appropriate quality QA/QC measures will be applied to ensure environmental information of a quality commensurate with project objectives. When possible, the potential environmental data quality needs of known secondary users will also be considered when determining data quality objectives. The required level of environmental information quality, the specific QA/QC activities

necessary, and the environmental information acceptance criteria will be explicitly described in the individual Quality Assurance Project Plans (QAPPs)

Fulfilling NMED's quality statement through established goals and commitment to the quality in environmental programs contributes to public health and safety, economic development, efficient use of public funds, technical credibility, and a recognition of excellence. The ECP shall act in accordance and serve with the highest standards of ethics, accountability, efficiency, and responsiveness to the citizens of New Mexico (NM), regulated communities, and staff through the following:

- Practice a factual approach to decisions and base decisions on the law, common sense, sound science, and fiscal responsibility.
- Use a system approach to quality management and ensure that regulations are necessary, effective, and apply regulations clearly and consistently.
- Continual improvement and implementation of a Quality Program that guides QA planning and quality control activities for individual projects or programs.
- Ensure consistent, just, and timely enforcement when environmental laws are violated.

- Document, record, and manage data throughout the entire process, this is during collection extraction from data sets, and storage to ensure its integrity and reliability.
    - Hire, develop, and retain a high-quality workforce with diverse backgrounds and expertise.
    - Create, nurture, and develop staff competencies, creativity, empowerment, and quality accountability by continuous education and training.
    - Ensure meaningful public participation in the decision-making process.
    - Promote and foster voluntary compliance with environmental laws and provide flexibility in achieving environmental goals.
    - Continual improvement and use of customer and staff feedback to previous process for enhanced Quality Assurance standards.
    - Provide outstanding service and product quality to achieve our endeavors for long-term success and sustained improvements.
    - QA practices and procedures will be implemented in the most cost-effective manner possible without compromising quality.
    - Ensure contractors adopt Quality Assurance through use of appropriate QAPPs.

The ECP Team, which consists of the WPD Director and Deputy Director, ECP Manager, ECP Water Professional III, Engineer Professional I, Program Coordinator II, Sampler, Data Analyst, Procurement Specialist II, and Public Relations along with the Quality Assurance Manager (QAM), is responsible for the implementation of this QMP and oversight of the Quality Program. The QAM will assess the implementation of this QMP annually and provide a report to the ECP Team to ensure sufficient resources are dedicated to supporting the QMP and Quality Program. The approval of the QMP by the ECP Team represents their commitment to quality management, principles, practices, and resource allocation of the EPC's Quality Program.

The current version of the Quality Management Plan is available electronically at https://www.env.nm.gov/pfas/ec-sdc/. The Quality Management Plan has been prepared in accordance with the following:

- EPA IT/IM Directive Policy, Directive No. CIO 2105.4"Environmental Information Policy," (March 20, 2024).
- EPA IT/IM Directive No. CIO 2105-P-01.4 "Environmental Information Quality Procedure" (March 20, 2024).
- EPA IT/IM Directive No. CIO 2105-S-01.1 "Quality Management Plan Standard," (March 20, 2024).
- EPA IT/IM Directive No. CIO 2105-S-02.1 Quality Assurance Project Plan Standard (April 3, 2024).

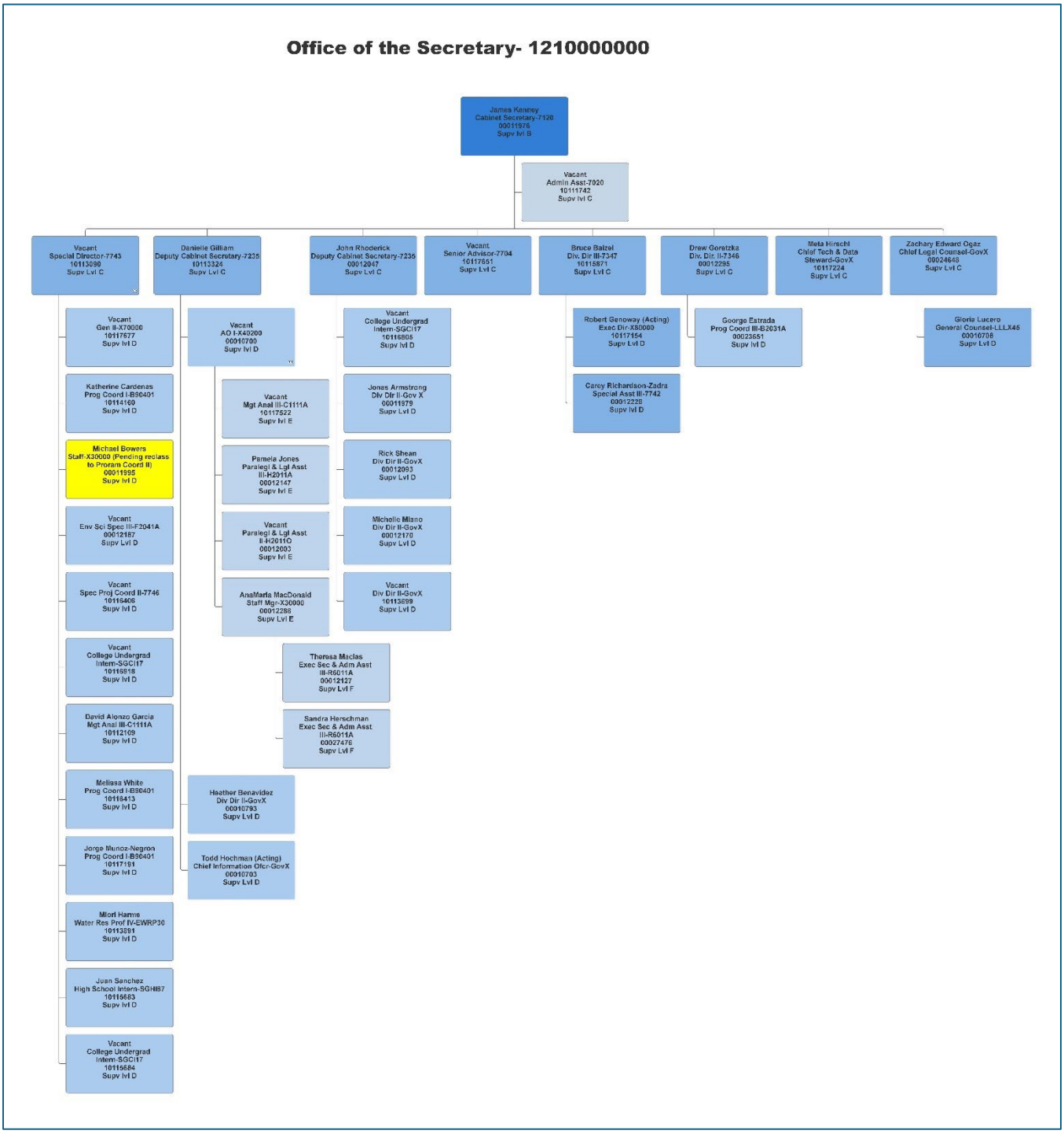
1.4 QUALITY PROGRAM RESOURCE ALLOCATION

All decisions regarding QA training and resources allocated to the quality program are made by the ECP Manager and Quality Assurance Manager. A key factor to the success of the Quality Program is that ECP management understands the importance of quality assurance in EIO and emphasizes the importance of QA training of ECP staff, especially those who develop and maintain project specific QAPPs and standard operating procedures (SOPs) for technical activities to accomplish the goals of the Quality Program.

1.5 NEW MEXICO ENVIRONMENT DEPARTMENT QUALITY PROGRAM STRUCTURE AND ORGANIZATION CHARTS

The department is a cabinet level regulatory agency of the State of New Mexico. The NMED Cabinet Secretary is appointed by the Governor and oversees the day-to-day operations of the department and responsibilities of Quality Programs reside in the Office of the Secretary. Through the delegation of the Cabinet Secretary the Water Protection Division (WPD) Director has designated the Drinking Water Bureau Chief to develop and oversee the Quality Program for the Bureau's environmental programs. The Drinking Water Bureau Chief has in turn delegated these responsibilities to the DWB Quality Assurance Manager. The DWB QAM also serves as the QAM for ECP, although ECP is under WPD.

Figure 1-1: NMED – Office of the Secretary Organization Chart – Updated January 2025



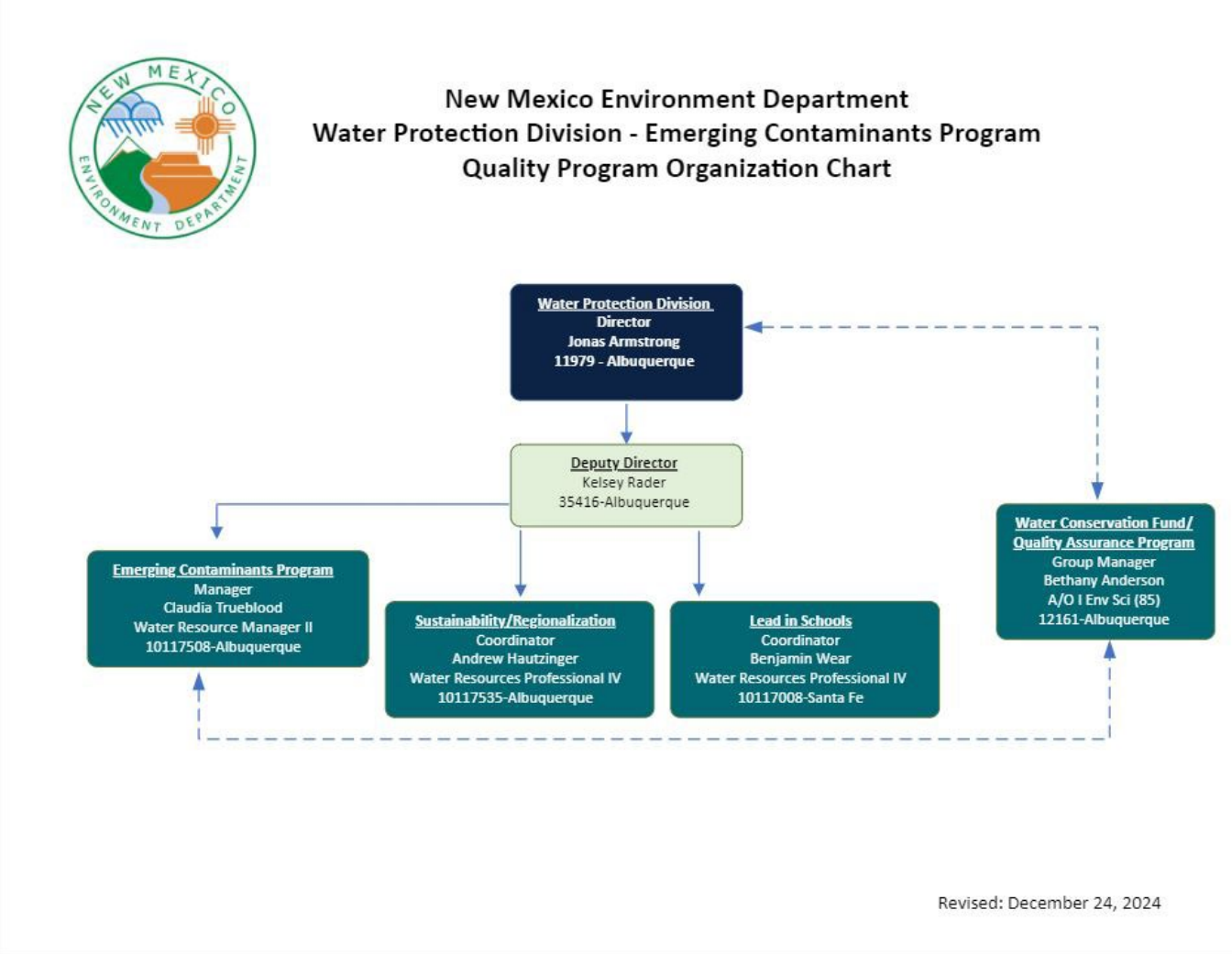
1.6 WATER PROTECTION DIVISION QUALITY STRUCTURE AND ORGANIZATION CHARTS

The Quality Program is organizationally independent of operational programs and activities within WPD and has sufficient access and authority to coordinate development and implementation of the agency's quality

system. The ECP Manager has the authority to develop and oversee environmental grants, programs, and projects. The ECP Manager also has access to all work areas and sufficient authority to initiate and facilitate solutions to quality problems and to verify the implementation of solutions to problems and implement QA Project Plans (QAPP) within their respected program(s).

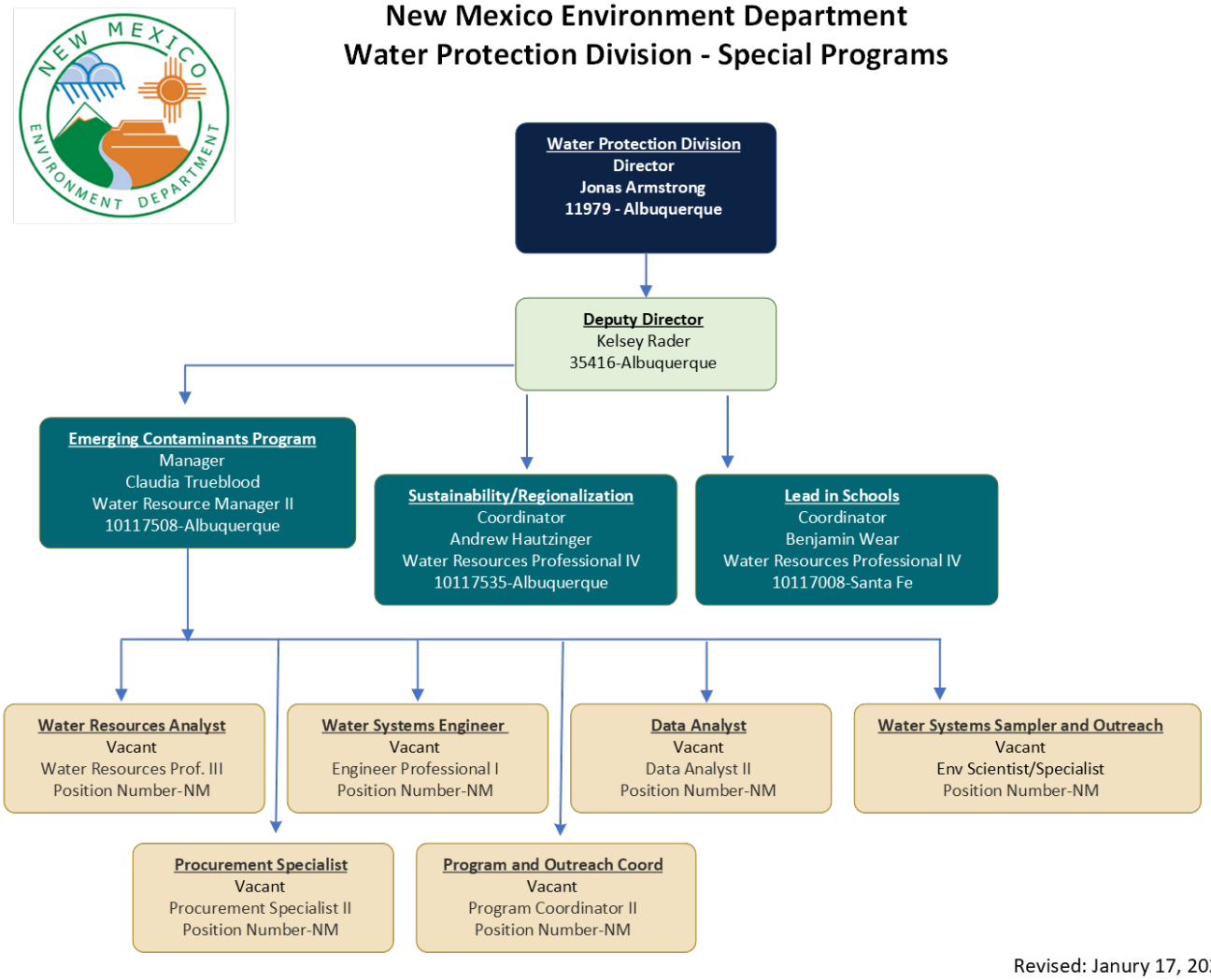
The ECP Manager is within the NMED Water Protection Division and reports directly to the Deputy Director of the Division

Figure 1-2: Emerging Contaminants Program - Quality Program Organization Chart



Note: This QMP is reviewed annually for content relevance and clarity.

Figure 1-3: Emerging Contaminants Program Organization Chart



Revised: Janury 17, 2025

Note: This QMP is reviewed annually for content relevance and clarity.

2 QUALITY PROGRAM ROLES, RESPONSIBILITIES AND AUTHORITIES

The following sections describe the responsibilities and authority of the Quality Assurance Manager (QAM) and ECP Manager.

2.1 QUALITY ASSURANCE MANAGER

The Quality Assurance Manager (QAM) is selected by, and reports to, the Drinking Water Bureau Chief. The QAM fulfills several roles for federal and state regulated programs within the Bureau and WPD. The QAM also serves as the Water Conservation Fund Group Manager, and as Certifying Authority for the Drinking Water Laboratory Certification Program.

The QAM serves as the QAM full-time and has Quality Management authority along with the ECP Manager for oversight of ECP's Quality Program. (EPA, IT/IM Directive No: CIO 2105-S-01.0).

The QAM is independent of program environmental information operations related to the ECP. The QAM has the authority and responsibility for conducting assessments of ECP. In the case the QAM position becomes vacant, the Water Protection Division Deputy Director, or designee, resumes oversight responsibility for the Quality Program. The QAM – QA related responsibilities are:

- Oversee and assess ECP's Quality Program.
    - Maintenance of ECP's Quality Management Plan.
    - Serves as point of contact for EPA regarding inquiries and submission of this QMP, QAPPs, and the Quality Program.
    - Represents senior management's goals, vision, and quality assurance commitment for the quality program.
    - Assists ECP Manager with maintenance of ECP's Quality Assurance Project Plans (QAPPs) and submission of QAPPs to EPA for approval.
    - Development and implementation of a Quality Assurance training program, and document QA related training completed by staff.
    - Development and implementation of an internal ECP audit and assessment program.
    - Keep current with all ECP program state AND federal regulations to ensure QA/QC requirements are implemented.
    - Keep current with quality management training AND certifications for environmental programs related to ASQ/ANSI E4:2014 (R2019).
    - Communicate changes and additions to QA standards, policies, and procedures to affected program areas.
    - Ensure quality-related issues are addressed by the appropriate level of agency management.
- Continuously encourage the development and awareness of QA within ECP.

2.2 QUALITY PROGRAM SENIOR MANAGEMENT

For purposes of this document and through delegation orders, the WPD Division Director and Deputy Director are collectively referred to as senior management since ECP is under WPD. In the absence of the ECP QAM, the WPD Deputy Director shall assume the duties of the QAM for ECP and oversee the Quality Program since the QAM is under the DWB and ECP is under WPD. The DWB Quality Program is organizationally independent of ECP operational programs and activities.

The QAM provides policy definition, leadership, and quality oversight in addition to serving as the overall authority for directing activities in accordance with program quality policy.

2.3 ECP Manager

The ECP Manager is selected by and reports to the WPD directors. The ECP Manager oversees all aspects of their respective EIO program operations, are authorized to manage ongoing environmental programs, and are accountable for the successful completion of program-related tasks and objectives. With assistance from the QAM the ECP Manager is responsible for project specific QAPPs and SOP development and maintenance for their managed programs.

The ECP Manager shall meet the responsibilities and duties of the agreed upon outputs presented in EPA assisted programs, grant funding terms AND conditions in extramural agreements, contracts AND Memorandum of Understanding/Agreements, Voluntary Programs, and QA AND QC environmental information operations.

ECP Manager QA related responsibilities:

- Supervise technical project staff that defines project objectives and data quality requirements, develop work plans, review data, and develop and assess standard operating procedures.
- Develop and initiate execution process for contracts and intergovernmental agreements.
- Review all contracts and agreements to ensure that they conform to accepted QA/QC procedures, and all QA/QC requirements mandated by cooperative agreements with federal agencies.
- Maintain a thorough knowledge of program work activities, commitments, deliverables, and time frames. Ensure the quality of the information generated meets the acceptance or performance criteria of the project throughout the implementation and assessment of the project.
- Advise supervisory staff when program timetables, tasks, and coordination procedures are not being met and provide feedback to supervisory staff as necessary regarding the performance of grant and project management.
- Evaluate and concur with proposed corrective actions and how corrective actions will be documented and verified – as well as receive and maintain assessment records; monitor the implementation of corrective actions.

    - Elevate problems and issues requiring resolution to the WPD directors for disposition, when appropriate. Recommend to the WPD directors, if they believe work should be stopped to safeguard programmatic objectives, worker safety, public health, or environmental protection.
    - Coordinate with the QAM on internal EIO program assessments to monitor the effectiveness of the program quality system.
    - Establish and implement acceptance or performance criteria appropriate for the regulations involved during the planning of the project. (These acceptance or performance criteria will be noted in the QAPP and will be used to define data quality requirements).
- As applicable, delegate the development and maintenance of the program QAPPs and SOPs to the ECP staff.
- Determine the acceptability of all QAPPs and SOPS before approval and implementation and assure the overall quality and integrity of all data generated within their programs.
- Provided oversight of all QA related field and laboratory functions. Implementing any changes that were noted in the Quality Assurance Status Report.
    - Develop necessary lines of communication and good working relationships between the lead staff of other divisions, bureaus, contractors, and organizations participating in a program.

3 TECHNICAL ACTIVITIES AND PROGRAMS SUPPORTED BY THE QMP

3.1 EC PROGRAM AND PROJECTS

ECP has implemented a Quality Program designed to produce the type and quality of data required by EIO programs. Environmental data used in ECP decision-making will be of known and documented quality and will meet specific program- and project-level requirements.

The Quality Program includes components that establish requirements and specifications for environmental programs and projects, planning and implementation tools, and assessment and response activities. The environmental programs listed below are implemented according to specifications and instructions contained in grant work plans and contractual agreements, this QMP, program or project QAPPs, SOPs.

3.1.1 Emerging Contaminants Program

Table 3-1: Emerging Contaminants - Program Activities to which the QMP applies

Emerging Contaminants	Program Activities
Sample entry points to the water distribution system in small or disadvantaged communities in NM, specifically to detect PFAS and other specific emerging contaminants	EPA's Final PFAS National Primary Drinking Water Regulation requires the regulated water systems to conduct initial monitoring by April 27, 2027. Initial monitoring requires to sample at all entry points of the water distribution system. Depending on the system size and source water type at an entry point, systems must conduct initial monitoring either twice or quarterly during a 12-month period in accordance with EPA's monitoring tables. A main goal of ECP is to support water systems, that qualify as small or disadvantaged, with the initial monitoring.
Educational Outreach	ECP's communications plan includes marketing, education, and outreach. The plan includes different elements related to the promotion of what NMED can offer to water systems in terms of testing, remediation, education and communication for them and the communities they serve.
Assessment	After each water system is sampled and the data is compiled, ECP will determine which systems have PFAS levels that exceed the drinking water regulations established by EPA.
Remediation	ECP will work with water systems with PFAS levels that exceed the drinking water regulations established by EPA to explore remediation strategies. ECP will engage engineers and if necessary, consultants to plan for and implement necessary treatment technologies, new water source development, or other remediation avenues.

Retest	After treatment technologies or other solutions are implemented, ECP will resample these systems which had previously had levels above the drinking water regulations to ensure solutions are effective.

4 COMPLIANCE WITH FEDERAL AND STATE POLICIES, PROCEDURES, STANDARDS AND REGULATIONS

4.1 EPA REGULATIONS, POLICIES, PROCEDURES, AND STANDARDS RELATED TO THE QMP

The following EPA policies, procedures, standards, and regulations pertinent to the EIO and are mandatory of NMED's Quality Program. These citations are valid at the time this QMP was developed. Since these documents are subject to periodic review, users of this Policy should refer to the most recent version. The QAM, or designee, will review and update any active links within the QMP on an annual basis.

4.1.1 Federal Regulations

- 5 U.S.C. App.; Pub. L. 98–80, 84 Stat. 2086 (Reorganization Plan No. 3 of 1970 - Appendix).
- 42 U.S.C. § 300f–300j, Safe Drinking Water Act.
- 2 CFR Part 1500: "Performance and Financial Monitoring and Reporting".
- 2 CFR Part 1500: Uniform Administrative Requirements. "Performance and Financial Monitoring and Reporting"
- 2 CFR Part 1500.12: "Uniform Administration Requirements, Cost Principles and Audit Requirements for Federal Awards, Quality Assurance".
- 40 CFR Part 35: Regulations for state and local assistance provided through EPA grants.
- 40 CFR Part 142: "Requirements for State Primacy".
- 48 CFR Part 46:" Quality Assurance".
- 40 CFR Part 49: "Tribal Authority Rule".
- 48 CFR Part 56: "Quality Assurance for Contracts".
- National Technology Transfer and Advancement Act, (PL 104-113)
- Clinger-Cohen Act of 1996 (PL 104-106)
- 1-41. Mandatory Quality Program Delegation 1200 TN 496 1-41
- Office of Management and Budget Circular A-130, Managing Information as a Strategic Resource
- 1-41. Mandatory Quality Program Delegation 1200 TN 496 1-41
- Office of Management and Budget Circular A-130, Managing Information as a Strategic Resource

4.1.2 EPA Policies

- Environmental Information Quality Policy, March 20, 2024, Directive No: CIO 2105.4
- EPA's Scientific Integrity Policy
- Enterprise Architecture Policy
- Data Standards Policy

4.1.3 EPA Policy Procedures

- Environmental Information Quality Procedure, March 20, 2024, No: CIO 2105-P-01.4
- Enterprise Architecture IT Standards Procedure EPA CIO 2122-P-03.1
- Data Standards Development Procedures (pdf)
- Enterprise Architecture IT Standards Procedure (pdf)

4.1.4 EPA Standards

- Quality Management Plan Standard, March 20, 2024, No: CIO 2105-S-01.1
- Quality Assurance Project Plan Standard, April 3, 2024, No: CIO 2105-S-02.1

4.1.5 EPA QA Related Guidance AND QA Documents

- The following link provides resources for development of QA/QC program related documents. Quality Program Directives - Guidance Documents.

- Information on the EPA Quality Program www.epa.gov/quality.
  - EPA Solicitation Clauses for DWB extramural contracts and agreements.
  - EPA: Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency .
  - EPA QA Field Activities Procedures, CIO 2105-P-02.0.
  - American National Standard ASQ/ANSI E4:2014 (R2019): Quality Management Systems for Environmental Information and Technology Programs – Requirements with Guidance for Use (May 2019).
  - Federal Register Notice on "Revisions to State Primacy Requirements to Implement Safe Drinking Water Act Amendments; Final Rule".

4.2 STATE OF NM CODES AND REGULATIONS RELATED TO THE QMP

- “Water Quality Act” (NMSA 1978, §§ 74-6-1 to 74-6-17).
- Section 9.7A.11 (NMSA 1978) “Cooperation with the federal government; authority of secretary; single state agency status”.
- Section 74-1-13 (NMSA 1978) “Compliance with the federal Safe Drinking Water Act”.
- Section 6-21A-1 (NMSA 1978) “Drinking Water State Revolving Loan Fund”.

- Section 20.7.10 (NMAC) “Applications for Public Water System Project Approval, J. (3) - QA/QC plan”.

5 CONFORMANCE WITH POLICIES, PROCEDURES, STANDARDS AND REGULATIONS

5.1 QA FIELD ACTIVITIES for Non-EPA Organizations

Field procedures are documented in the QAPP listed below. These procedures facilitate sample tracking, standardize data entries, and establish the authenticity of the data collected. All field records shall be generated and stored as specified in project specific QAPPs and SOPs. The following QAPP is active for ECP projects:

- Quality Assurance Project Plan (QAPP) for Emerging Contaminant Program- All activities performed by NMED ECP staff or contractors are covered within the ECP QAPP.

Proper field documentation ensures that essential and required information is consistently acquired and preserved. Documentation of field activities and chain-of-custody records is done in accordance with EPA QA Field Activities Procedure CIO 2105-P-02.0 to ensure ECP field staff and contractors have procedures that include documentation for the following:

- Staff, and applicable Staff Training
- Document Control
- Records Management
- Sampling and Environmental Data Management
- Field Documentation
- Field Equipment
- Field Inspection and Investigations
- Reports
- Internal Audits
- Corrective Actions

5.2 COMPUTER HARDWARE AND SOFTWARE

ECP is committed to ensuring that computer hardware, software, and networks used to manage data for environmental programs shall be controlled for reliable stewardship of the data. The WPD complies with *EPA CIO 2122-P-03.1 Enterprise Architecture IT Standards Procedure,* EPA *CIO 2104.1 IT/IM Directive Policy Software Management and Piracy Policy, EPA CIO 2104-P-01-0 Software Management and Piracy Procedure, and the "State Cybersecurity Act, NMSA 1978"* applies to all executive agencies, state entities, contractors and subcontractors and meets specific grant terms and conditions for cyber security under 2 CFR 200.331(d).

The NMED Office of Information Technology (OIT) is the Department IT Division responsible for information technology systems, software and hardware that enable automation of the department's mission critical business processes while supporting day-to-day operations for existing systems, databases, networks, telecommunications, and cybersecurity for the Department. The OIT groups that support this QMP are as follows:

- **The Office of the CIO Group** – provides support to NMED programs for collaborative development of scopes of work for IT contracts as well as administrative and project management services for IT federal grants awarded through the EPA.

- **The Solutions Group** – is responsible for delivering modern digital technologies to drive the business of the department. Sections in this group are the Web Solutions Section, Application Development Section, and the Geographic Information Systems Section
  - **The Web Solutions Section** – is responsible for delivering publicly available content through our website and incorporating web tools for public use.
  - **The Applications Development Section** – is responsible for Tier 2 Support for the majority of existing NMED data-driven web applications. The Applications Section also directly supervises Contracted Application Development underway for Bureaus and programs via staff augmentation and works with Full-Service Development Vendors to ensure that NMED technical standards are observed. Applications Section provides data reporting services across all NMED applications and is currently endeavoring to create an API library to facilitate access to public NMED data. The Applications Section also has responsibility for streamlining and modernizing application development processes and procedures for both contracted and in-house development.
  - **The Geographic Information Systems (GIS) Section** – is responsible for procuring licensing of GIS software and software support, assisting media Bureaus (air, soils, water) with obtaining and sharing data, both internally and with the public via web maps and mobile apps, creation of GIS standards, and consultation with geoscientists on best practices regarding GIS on projects and requests for proposals.
  - **The Operations Group** – is responsible for client and application support, and technology infrastructure for NMED. Sections in this group are the Network and Systems Section, the Data Management Section, and the Client Support Section.
  - **The Network and Systems Section** – is responsible for the network and server computing infrastructure for NMED.
  - **The Data Management Section** – is responsible for the operation, maintenance, and safeguarding of the department-wide database management systems.
  - **The Client Support Section** – is responsible for first level support for all department PCs, printers and copiers, desktop software, network troubleshooting, managing user access, and managing telecommunications requests.

    Authorities

    -"Department of Information Technology Act". (NMSA 1978): Chapter 13 - Executive Department Article 27 – Department of Information Technology, §9-27-1 through 9-27-27-1.

    - "Cybersecurity Act". (NMSA 1978): Chapter 13 - Executive Department Article 27A – Cybersecurity, §9-27A-1 through §9-27A-5.

  - **New Mexico Administrative Code (NMAC)** Title 1 General Government Administration, Chapter 12 – Information Technology Part 1 through Part 21. Part 21 defines the state's

rules as to set forth provisions that apply to all rules adopted by the information technology commission and describes information security operations and management.

5.3 WPD COMPETENCE

5.3.1 Competency Demonstration

The Water Protection Division includes a statement of competency in its grant work plan and in program/project QA documents. The ECP maintains records of current organizational charts and position descriptions for applicable ECP staff, contractors, and subcontractors, along with major responsibilities and qualifications and active participation in QA/QC requirements associations with ECP and documented in QA, staff, and contractor/subcontractor files.

ECP recognizes that its most valuable resource is its human resource. ECP is committed to hiring well-qualified employees and supporting their training and development so that ECP has confident, highly qualified staff who are effective and work as an efficient team to meet the goals and objectives of ECP.

The Department and ECP prepare functional job descriptions for each position that include a brief job description; a list of essential job functions and the percentage of time devoted to each function; physical and environmental demands and hazards; and cognitive, communication, and other job- related demands ensuring proper classification, Fair Labor Standards Act (FLSA) designation, and American Disabilities Act (ADA) accommodations. The NMED Human Resources Bureau (HRB) reviews, approves, and maintains the job descriptions.

The NM State Personnel Office (SPO) provides general qualification guidelines for all state job classifications. These guidelines are used in developing and establishing minimal qualifications through collaborative efforts of the Bureau and the NMED Human Resources Bureau. Each job description specifies minimal requirements which establish educational requirements, work experience, applicable required licenses, skills, knowledge, and other requirements specific to individual job classifications.

5.4 ECP QA AND TECHNICAL STAFF TRAINING

The ECP Manager is responsible for ensuring that ECP staff meet the minimum qualifications specified for a position whenever a new employee is hired. They also ensure that all staff receive appropriate training and attend workshops or other informative events applicable to their job description and position. The ECP Manager encourages employees to seek out and attend training courses and workshops. Supervisor approval is required prior to attending any such event and is subject to available resources. Standard Operating Procedures (SOPs) are developed by and implemented through routine training provided by ECP Manager for primary programmatic decision-making processes.

Training needs are determined annually through a “needs” assessment process and on an individual basis by the ECP Manager in consultation with staff. Training needs are based on a variety of factors, including data collected from the EPC’s workforce plan, succession plans, statutory requirements, management directives, position requirements, SOPs, QAPPs, and employee development plans. The QAM, or designee, is responsible for documenting and maintaining records related to the completion of training requirements, as part of the performance management.

All ECP staff who perform EIO and ensure QA/QC requirements are implemented within supervised programs and program projects shall take related QA trainings through EPA QA online training courses found at the following links:

- EPA R6 - QA Training for Non-EPA R6 Employees.
- EPA QA Training - Managing the Quality of Environmental Information

Additional training needs may be specified in QAPPs, and types of training can include courses from core curricula and/or technical, QA, operational, general work skills, employee development, leadership, and management development categories.

5.5 PROCUREMENT OF ITEMS AND SERVICES

The WPD is committed to ensuring all procurement of items and services shall be controlled and documented to ensure conformance with specified requirements included or referenced in the applicable procurement documents. The acceptability of purchased items and services will be verified and documented. The QAM, along with the ECP Manager shall ensure programs procurement of goods and services, and third-party contracts and agreements involving environmental information, meet the QA requirements of extramural agreements for EPA's grants and assisted programs terms AND conditions listed within Section J – Quality Assurance and comply with 2 C.F.R. § 1500.12 Quality Assurance.

WPD follows procurement procedures in accordance with the New Mexico Procurement Code, Chapter 13, §13-1-28 through §13-1-999 [NMSA 1978]. The purpose of the procurement code is to provide for the fair and equal treatment of all persons involved in public procurement, to maximize the purchasing value of public funds and to provide safeguards for maintaining a procurement system of quality and EIO integrity for applicable extramural agreements, contracts, assistance agreements, interagency agreements, memorandum of understanding, and other cooperative agreements.

The WPD's Financial Manager and financial staff oversee the Division's financial and purchasing needs, internal procedures for staff travel, contracts, and accounts payable. The WPD's Financial Manager reviews and approves procurement documents before vetting through/to appropriate internal and external purchasing and procurement approval process.

Multiple processes and levels of approval are used to assure the quality of procured products and the quality and integrity of the procurement process. For all procurements, if there are quality requirements or if the product will influence the quality of environmental programs or data, the QAM should be consulted.

In addition to the product or service required, the dollar value of the procurement will dictate the handling. Procurements are managed at three levels, each with its own process and authorizations. They are small purchases, informal purchases (non-competitive process), and formal purchases (competitive process).

5.5.1 Competitive Sealed Bids

Formal purchases require procurements be done through a competitive process using one of the following:

- **Invitation to Bid (ITB**) – require the State Purchasing Division to conduct the procurement through formal sealed bids (NMAC 1.4.1.16, et seq).

- **Request for Proposal (RFP)** for general services/goods – the State Purchasing Division conducts the procurement through formal sealed bids for general services/goods are mixed with professional services.
- **RFPs for purely professional services** – NMED conducts the procurement through formal sealed bids and oversees the RFP process for professional services in accordance with the NM Procurement Code for competitive sealed bids §§ 13-1-102 - 13-1-122, NMSA 1978) State Procurement Code Regulations (NMAC 1.4.1.32, et seq).

5.5.2 Evaluation of Bids and Proposals

ITB solicitation is managed by the General Services Division (GSD) – State Purchasing Division (SPD). Bid Evaluations are reviewed by the ECP Manager, ECP Procurement Specialist, and ECP program coordinator. The WPD Financial Manager will send SPD the ECP Manager's response with recommendations of bids received. Successful bidders are awarded a contract(s) through an agency specific price agreement managed by SPD and contracts have options to renew annually for up to four years.

RFP solicitation is managed by the NMED Procurement Officer, or designee. The technical evaluation of a RFP, the proposals submitted, and any resulting contract documents are conducted by an evaluation committee to ensure that they are complete and accurate. The RFP describes the services needed; the associated technical and quality requirements; the quality system elements for which the supplier is responsible; and requires verification of the supplier's conformance to quality requirements. Proposal questions are reviewed by the ECP Manager for responses, who then make recommendations for successful proposals and instructs to proceed with the professional contract process. The GSD Contracts Review board reviews professional service contracts before forwarding them to the NM Department of Finance for contract finalization.

5.5.3 Procurement Documents

All procurements are defined in writing in one or more procurement documents (such as purchase orders, invitations for bid, requests for proposals, and procurement contracts). These documents specify tasks and product specifications and technical, quality, administrative, and other requirements. All procurements are approved prior to issuance. Approval requirements vary depending on the nature and cost of the item or service being purchased.

QA related documents must ensure adequate quality and, to the extent necessary, require suppliers, contractors, and subcontractors to have QA programs consistent with the ECP Quality Program and project. The EPC Manager shall review EPA extramural agreements and ensure all specific quality related requirements and clauses list are included within contracts.

5.5.4 Acceptance of Items and Services

Items and services received from suppliers are evaluated upon delivery against acceptance criteria contained in procurement documents. The ECP staff determines whether acceptance of service deliverables criteria have been met and whether services are adequate and appropriate for use. Supplier deliverables requirements of the Division are listed within awarded contracts the scope of work.

If items or services do not meet acceptance criteria, corrective actions are initiated in accordance with state statutes, contract provisions, and the Department's procurement procedures. Corrective actions may range from repair or replacement of defective deliverables to stop work order and/or request to re-award procurements.

5.5.5 Procurement Technical Requirements

Technical requirements are determined by the ECP Manager or, or designee(s), and technical requirements shall be included in procurement documents and contracts when applicable. Purchases of information technology products and services are also reviewed and approved by NMED- Office of Information Technology (OIT) and/or DoIT when purchase amount meets the DoIT purchase threshold.

5.5.6 Procurement Quality Assurance Requirements

QA requirements are determined by ECP Manager or designee(s), with the assistance of the grant management section, NMED general counsel, Chief Procurement Officer, contract staff, and QAM. QA related documents must ensure adequate quality and, to the extent necessary, require suppliers, contractors, and subcontractors to have QA programs consistent with ECP

The QAM, when applicable, may be required to participate in the procurement process for both pre-solicitation and post-award phases for all contracts, technical evaluations of contracts, and where quality requirements apply. The QAM shall review program grant agreements, work plans, and ensure specific required terms and conditions are within contracts and necessary QA documents.

5.5.7 Procurement Process Summary

Table 5-1: Types of Procurement

Type of Purchase/ Service	Procurement Description	Monetary Values	Approving Agency			Procurement Documentation AND Process
			NMED	GSD-SPD CRB	DFA	
Tangible Goods (Items) AND General Services	Small Purchases for non-professional services, construction, or tangible goods (NMAC 1.4.1.50)	$5K - $20K	X	X	X	DPO, 2 Quotes, best attainable price (NMAC 1.4.1.7).
Tangible Goods and General Services	Small Purchases for non-professional services, construction, or tangible goods (NMAC 1.4.1.50)	$20K - $60K	X	X	X	DPO 3 Quotes, best obtainable price or ITB competitive process, agency PA are awarded contracts for four renewal terms (NMAC 1.4.1.16).

Tangible Goods (Items) AND General Services	Competitive Sealed Bid Process	>$60K		X		ITB (NMAC 1.4.1.16) or RFP (NMAC 1.4.1.31) process if some professional services are required
Professional Services	Small Professional Services Contract	$5K - $60K	X	X (CRB)	X	Must be awarded via contract, three (3) quotes. Contract is valid for 1 year.
Professional Services	Competitive Sealed Bid Process	≥ S60K	X	X (CRB)	X	RFP successful bidders are awarded contracts with terms up to 4 years.
Professional or General Services	Memorandum of Agreement (MOA)	Unlimited	X	X	X	Inter-agency mutual agreement between NM state agencies or between state agency and federal agency.
Professional or General Services	Memorandum of Understanding (MOU)	No money exchanged	X			Inter-agency mutual agreement between NMs state agencies or between state agency and federal agency.

5.5.8 Procurement Authority and Guidance

ECP procurement is governed by the following:

- New Mexico Statutes Annotated 1978 (NMSA 1978): Title 1, Chapter 13 Public Purchases and Property, Article 1 – Procurement, §13-1-28 through §13-1-999. Short tile: "Procurement Code"
- New Mexico Administrative Codes (NMAC): Title 1 General Government Administration, Chapter 4 – State Procurement, Part 1 Procurement Code Regulations.
- New Mexico Administrative Codes (NMAC): Title 1 General Government Administration, Chapter 4 Public Finance, Part 10 – Governing Approval of Contracts for the Purchase of Professional Services.
- New Mexico Department of Finance AND Administration (DFA) - Fiscal Year "Manual of Model Accounting Practices", section FIN-4 Purchasing. Short Title – NM DFA - MAPS. The Financial Control Division (FCD) of the New Mexico Department of Finance and Administration was created by NMSA 1978, §6-5-1 as amended. FCD prescribes procedures, policies, and processing documents for use by state agencies in connection with fiscal matters. MAPs are required to be followed by all state agencies (NMSA 1978, §6-5-1 through §6-5-6).
- New Mexico General Services Department (GSD) – State Purchasing Division (SPD). The GSD-SPD is focused on providing cost-effective products and services through competitive, open, and transparent purchases. Statewide Pricing Agreements and cooperative contracts are made

available for use by NM Governmental entities through Invitation to Bid (ITB) and Requests for proposals (RFP).

- New Mexico General Services Department (GSD) – Contracts Review Bureau (CRB). The CRB responsibility is the review of contracts for professional services with state agencies s and ensures form, legal sufficiency, and budget as to compliance with DFA fiscal rules and policies and GSD procurement rules, regulations, and policies.
- New Mexico Department of Information Technology (DoIT) – IT Procurement, Contract, and RFP Procedural Guidance. IT Procurement, Contract, and RFP Procedural Guidance. The DoIT is the Contract, and authority for the state's IT professional service contracts and IT purchases and/or leases for software/hardware which exceed $20,000.00.

6 DOCUMENT AND RECORD PROCESS

6.1 Document and Record Process

The QAM reviews the QMP and the program QAPPs and is responsible for tracking and maintaining other quality program related documents and records. The QMP final content decision and approval is the responsibility of the ECP Manager. QAPPs are approved and signed by the QAM, ECP Manager and the WPD Deputy Director. The QMP and QAPPs are reviewed annually and revised, as necessary.

After review and approval, signed copies of the QMP and QAPP are provided to EPA for review and approval. Upon approval by EPA, the ECP Manager distributes the documents to the appropriate staff and requires everyone to complete and sign an acknowledgement statement indicating that they have received the document and that it is their responsibility to adhere to the requirements included in the document.

Any ECP staff member can propose a policy, procedure or guidance for documentation or revision and will coordinate its first draft which involves tracking changes and soliciting input and feedback from all applicable staff within ECP. First drafts are reviewed and edited by the staff member who initiated the revisions and then the final draft copy is shared with ECP Manager who is responsible for finalizing and approving the draft. If applicable the revised version of the document will go to QAM for final review/approval. A different process is used for a policy revision. A policy draft is sent first by the EPC Manager to the Office of General Counsel (OGC), via a legal request memo, for review and approval. Once approved by OGC, the draft goes to the WPD Director for review and final approval.

All approved operations documents are filed in the ECP SharePoint subfolder. Approved documents will have approval signatures with dates. Older versions of approved documents will be kept in an archive folder for reference.

Documents that specify requirements, procedures, and instructions affecting the quality of environmental programs shall be adequate for the intended purpose and shall be controlled. QA records will be produced, controlled, and maintained to reflect the achievement of the required quality for completed work and to fulfill statutory, regulatory, and contractual requirements. Records produced by ECP and maintained as official records of the State of New Mexico are documented in the agency Records Retention Schedule.

6.1.1 Quality Assurance Documents

QA records are items that furnish objective evidence of the quality of items or of activities that have been verified and authenticated as technically complete and correct documents that follow specific quality-related requirements and instructions. Some of those QA records may include, but are not limited to, the following:

- QAPPs.
- SOPs that incorporate specific QA procedures in EIO programs/projects.
- Program guidance documents.
- Grant work plans.
- Contracts.

- Data management plans.
- QA records may also include, when applicable, program/project correspondence, photographs, forms, completed, reports, and electronically recorded data.

The QAM, or designee, shall maintain QA records relating to individual projects and shall specify the location and procedures for identifying, verifying, authenticating, handling, retaining, and disposing of these records. The QAM, or designee, shall also maintain a current listing of all types of QA records relating to their respective areas of responsibility.

Table 6-1: Emerging Contaminants Program - Records Repositories

Common Name	Location	Description
Geographic record of communities and systems that qualify as small or disadvantaged (SD) under ECP	Maintained by NMED-WPD personnel as a shared folder on SharePoint with a backup copy placed in the appropriate NMED network folder	List of the systems and communities that qualify for EC-SD with the respective entry points to the water distribution system.
Requests from communities and water systems to participate in ECP	Electronic application via NMED web portal and maintained by NMED IT Department and ECP via email records	Electronic requests by communities and water systems to participate in ECP and to get samples for initial monitoring.
Agreements with communities and water systems to participate in ECP	Records will be kept by ECP and saved in SharePoint folder	These agreements include details about what communities and water systems interested in participating in the ECP agree to do according to a timeline, and what ECP agrees to do and when
Sample Collection and Scientific Analyses	Certified laboratories processing the water samples, NMED IT Department, and SDWIS Team	Analytical results of water samples reported by NM Scientific Laboratory or other certified laboratories processing the water samples part of ECP activities
Sampling Details and Analytical Reports Recorded in Data Repository	Electronic database maintained by Source Water Protection Team Lead and ECP on a shared folder.	Electronic repository for water test analyses for initial and compliance monitoring. Contractors and ECP personnel will use a shared folder that will be created by the contractors granting specific ECP staff and collaborators access with editing permissions. The shared folder will require users to be authenticated. If NMED staff want to internally backup these files, to ServerShare or their desktops, ECP will specify best

		management practices like adding a date stamp to internally backed-up files.
Contracts, agreements, and supporting documents	The Water Protection Division-Administrative Operation section has these documents stored in the NMED Shared Drive.	Documents corresponding to each contract and agreement established for ECP, and supporting documents like purchase orders, invoices, and record of payments.
Safe Drinking Water Information System (SDWIS)	Electronic database maintained by Drinking Water Bureau Staff	Electronic repository for information specific to individual water systems such as board and operator contact information, inventory information, and information pertaining to monitoring and compliance schedules, violations, and any enforcement or assistance actions.
Grants	NMED Grants Section manage these documents and records.	Documents related to the ECP grant and subgrants.
Community and Water System Training Database	Electronic database maintained by ECP	Electronic repository for information specific to trainings and presentations given to community members and water systems involved in ECP activities
Assessment	Electronic database maintained by ECP	After each water system is sampled and the data is compiled, ECP will keep record of which systems have PFAS levels that exceed the drinking water regulations established by EPA.
Remediation	Electronic database maintained by ECP	From the systems that had PFAS levels that exceeded the drinking water regulations established by EPA, EPC will keep record of remediation strategies and actions implemented by ECP via staff and contractors, and to which water systems agreed.
Resample/Retest	Electronic database maintained by ECP	ECP will keep record of water tests and results from water systems for which treatment technologies or other remediation solutions were implemented.
QMP and QAPP	NMED public facing website	Upon EPA approval, the QMP and QAPP for ECP can be accessed at https://www.env.nm.gov/pfas/ec-sdc/

6.1.2 Official State Records and ECP Record Retention Schedules

As a condition of primary enforcement responsibility, 40 CFR 142.14 requires states to have specific record retention periods for all documents, including those generated and/or stored electronically.

Retention and Disposition Public Records (1.21.2 NMAC) designates specific retention periods for all documents considered public records under "The Inspection of Public Records Act" Section 14-2-1 NMSA 1978. In addition, Management of Electronic Records, 1.13.3 NMAC; Public Records, 1.13.10 NMAC;

Disposition of Public Records and Non-Records,1.13.30 NMAC require that state agencies have procedures in place to address document management, protection, retention, and disposal. ECP will retain all records in accordance with, or longer than, the specific requirements as outlined in 40 CFR 142.14 and/or 1.21.2 NMAC.

ECP must maintain records of tests, measurements, analyses, decisions, and determinations performed on public water systems to determine and document compliance with federal and state drinking water regulations. Public records shall be maintained in their original format (paper/digital) and all original records may be digitized once the state records administrator has approved a plan.

The EC Manager and QAM shall ensure identification, verification, authentication, handling, retention, and disposition of documents and records needed to safeguard the legal and financial rights of the State of New Mexico and any person directly affected by activities of ECP including fulfillment of statutory, regulatory, and contractual requirements for environmental programs are procedures fulfilling record requirements implemented. Records produced by ECP and maintained as official records of the State of New Mexico are documented in the agency Records Retention Schedule.

Table 6-2: Emerging Contaminants Program - Record Retention Schedule

DWB Records Description	DWB Record Retention Time
Compliance data	10 years from date of applicable compliance period.
Financial Records	3 years from closing of file or applicable financial timeframe, i.e., grant period or state fiscal year.
Contracts/Agreements	6 years from termination date.
Program Records	Retain annual grant/program summary reports as permanent, otherwise, 5 years from closing of file or applicable financial timeframe, i.e., grant period or state fiscal year.
Employee Staff and Training Files	3 years after separation of employment.
Operations Documents	Permanent; archive 1 year from date superseded or obsolete.

7 ECP QUALITY MODEL - PLAN, DO, CHECK, ACT (PDCA)

7.1 ECP PROGRAM PLANNING (PLAN)

Requirements for ECP are planned in accordance with state and federal laws and rules, agency policies and procedures, and extramural agreement requirements.

Organizational and programmatic requirements concerning environmental programs are defined by state and federal drinking water regulations, policies, and procedures. These regulations are the primary planning tool used for EPC.

The EPC goals and objectives are planned and documented in the overarching ECP work plan, QAPPs, quality assessment plans, SOPs, Safe Drinking Water Information System (SDWIS), and contracts executed by ECP.

7.1.1 ECP Program Project Planning

Projects that generate, acquire, and use environmental data are planned and developed through QAPPs and SOPs that are structured to provide a planning process that is aligned with regulatory requirements, associated data collection schedules, policies, guidance documents, and clearly identify participant roles and responsibilities including specific tasks for the following:

- QAPPs: The QAM prepares, reviews, maintains, and revises EPA-approved QAPPs. The ECP team participates during the review process to ensure procedures and policies are current and appropriate to meet program requirements, goals objectives and the procedures used to implement ECP activities are clear, and the process for quality assessments is well defined. QAPPs conform to requirements contained in *EPA Requirements for Quality Assurance Project Plans*, EPA QA/R-5. Other project planning documents will conform to program requirements which include adherence to the principles of EPA QA/R-5.
- SDWIS streamlines planning by maintaining sampling schedules, monitoring, and reporting requirements, compliance deadlines, and other information important to planning and implementing EPC activities for approximately 650 water systems in New Mexico that qualify for the ECP in small or disadvantaged communities.
- Environmental data collection operations and work activities are planned according to EPA's data quality objectives (DQO) process and are documented in quality assurance project plans to ensure that the work processes are implemented as planned and in accordance with the established quality system,
- Project SOPs: Are developed by programmatic staff and approved by ECP Manager and QAM according to specific program requirements and procedures and must be produced in accordance with established document control procedures. SOPs for collection, analysis, and validation of environmental data developed in accordance with program requirements, are reviewed, and revised during the term of the approved QAPP.
- Revisions to SOPs are made as necessary and reviewed in the same manner as new SOPs or as specified in other procedures. New SOPs and revisions to existing SOPs are uniquely identified. Each new SOP, or a revision of an existing SOP, must be approved by the ECP Manager and QAM,

prior to issuance. SOPs will conform to *Guidance for Preparing Standard Operating Procedures (SOPs) for Quality-Related Documents* (EPA QA/G-6) as applicable.

7.2 ECP PROGRAM AND PROJECT IMPLEMENTATION (DO)

The ECP Manager is responsible for ensuring ECP program elements are being adhered to at each level of the program. Assessments shall be conducted by the QAM at least once a year to evaluate quality assurance procedures and their alignment to the ECP QMP.

Environmental programs shall be conducted to ensure that customer needs and requirements are met, and products and results are produced in a timely manner. Environmental programs conducted by or on behalf of ECP shall be implemented in accordance with approved work plans. Exceptions, deviations, and changes to these plans shall be approved and documented prior to implementation.

ECP ensures environmental work is performed according to plan through the following:

- Program and project planning.
- Ongoing oversight of performance
- Staff performance evaluations

ECP's QMP is reviewed and revised annually by the QAM as applicable for EPA's approval. QAPPs are reviewed by the QAM annually and revised, as necessary. The QAM shall monitor the status of QAPPs, and terms and conditions of grants agreements related to EPA QA implementation requirements in QAPPs. The QAM will report within 30 days to the ECP Manager if any environmental data operations do not have current or approved QAPP.

As part of ECP's quality program, the QAM maintains all QA documents integral to the quality program and shall ensure QA documents are readily available to all staff. Maintenance includes ensuring appropriate reviews and approvals are conducted as well as ensuring that outdated documents are withdrawn. ECP staff input is allowed during QA document review process to ensure that procedures and policies are current and appropriate to meet program requirements.

7.3 QUALITY PROGRAM ASSESSMENT AND OVERSIGHT (CHECK)

ECP will be assessed at least once a year. Annual assessments are conducted based on the period when ECP staff have the most time available to assess their activities and assist the QAM with the quality assurance audits of EIO programs.

Assessments may be conducted if required due to customer or employee complaints, findings from external audits, or to check on the training of new and current staff (especially if there is a major change in federal or state regulations in between annual assessments).

The QAM is responsible for EIO program assessments, writing assessment reports, and tracking corrective actions for any deficiencies found during the audit process. The ECP Manager may also assist with developing corrective actions, solving any disputes over corrective actions, and reviewing assessment reports.

The assessment may be either a QA assessment, managerial, or technical assessment. The QAM may use one of several assessment tools including: quality system audits, management systems reviews, peer reviews, technical reviews, performance evaluations, data quality assessments, readiness reviews, technical systems audits, and surveillance. The results of the assessment will be reported to the ECP Manager for their review, approval, and assistance with corrective actions and disputes as necessary.

7.3.1 Types of ECP Assessments

Contract/ Vendor Audits: Done before a contractor/vendor is selected to ensure that the contractor/vendor can fulfill all aspects of the contract/ supply order on time and on budget. Also done quarterly to make sure the contractor is following the schedule and that their work meets the necessary standards. Also done at the end of the contract to make sure all work is properly completed.

Data Assessments: A review of data to ensure that it is complete, accurate, traceable, and organized. Looks for any trends in data or data quality. Data audits are performed by the SDWIS Supervisor and are distinct from the validation and verification process for environmental data as defined in the project QAPP and SOPs.

Document Audit: Audit of new and/or existing documents including SOPs, QAPPs, and forms to make sure that they are up to date and adhere to the most recent state and federal regulations and standards. Also makes sure that documents are properly secured, organized/ archived, distributed, and recalled if obsolete. Can help resolve/check for any discrepancies between documents. For example, are SOPs in agreement with QAPPs. Ensures that documents are written at the proper level for the users.

Program Assessment: Assessments are done to ensure that technical and management programs including the quality assurance program are meeting their goals and following written procedures. It also ensures that programs are meeting the needs of water systems and the public.

Preparatory Assessments: Assessments done to ensure that the ECP has all the materials in place and up to date for an external audit.

Training Assessments: Assessments of training courses to ensure they properly cover all aspects of the job, are kept up to date with the latest SOPs, QAPPs, regulations, and technologies.

7.4 CORRECTIVE ACTIONS AND IMPROVEMENTS (ACT)

The QAM will review quality-related deficiencies, non-conformances, and quality related programmatic improvements on at least an annual basis. The QAM will advise the ECP Manager of any significant trends that need to be addressed to ensure the quality of work products and will review Quality Program goals as necessary.

All staff working on environmental programs are encouraged to identify, plan, implement, and evaluate quality improvement activities for their areas of responsibility. Staff should prevent quality problems, report quality problems, and submit quality improvement suggestions.

Deficiencies and non-conformances should be reported to the ECP Manager and QAM to ensure that deficiencies and non-conformances are documented and addressed appropriately. If necessary, the both of them, or their designee, will develop a plan for corrective action.

Corrective Actions documents:

- Root cause(s)
- Programmatic impact
- Required corrective action(s), including action(s) needed to prevent recurrence.
- Means by which corrective action completion will be documented and verified.
- Timetable(s)
- Milestones to be used to track progress through completion.
- Individuals responsible for implementing corrective action.

If delegated by the QAM and ECP Manager, the appropriate ECP staff member shall ensure that corrective actions are implemented in a timely manner. ECP staff shall be encouraged by the QAM and ECP Manager to maintain open communication so they can help identify process improvement opportunities and propose solutions to problems. The ECP staff member who implemented the corrective actions shall notify the QAM when those actions have been completed, verified to be effective, and have been closed.

7.5 TREND ANALYSIS AND ANNUAL REPORTING

Annually, the QAM shall review reported quality-related deficiencies, assess programmatic information, improvements, and inform the ECP Manager about the findings as part of the quality assurance annual audit. At least annually, the QAM shall advise the ECP Manager and staff of significant trends affecting the agency Quality Program. The QAM shall provide an annual report describing the status of ECP's Quality Program through QA/QC audits and assessments to the ECP Manager for review and approval prior to the submission to EPA Region 6.

7.6 DISPUTE RESOLUTION PROCESS

When disputes related to quality arise between ECP activities or ECP staff, there shall be an initial attempt to resolve those disputes at the lowest organizational level. Quality-related disputes that cannot be resolved at the staff level will be elevated through the QAM to the ECP Manager and if necessary the two of them will bring it to the attention of the WPD Deputy Director.

7.7 CONTINUAL IMPROVEMENT

Ideas for improving the processes will be brought up by ECP staff members to ECP team meetings as the first step, and employee check-ins as the next step, and finally weekly employee reports as the third layer of reporting issues and suggesting improvement ideas. The overall goal in continuous improvement of the Quality Program is to anticipate and minimize problems from arising, identify issues early on, and correct deficiencies as soon as feasible, ensuring that the corrective action is successful in addressing the issue, and well documented.

Quality-related deficiencies shall be prevented wherever possible. Identified deficiencies shall be documented and corrected in a timely manner. Corrective actions will be verified to ensure timely and effective implementation. Efforts will be made to improve quality systems in EIO programs and QA documents. ECP Manager and staff, and QAM should prevent quality problems wherever possible, report problems as they occur, and identify opportunities for improvement.