Directive No: CIO 2105.4

*Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19*

Environmental Information Quality Policy

1.   PURPOSE

This Policy:
- establishes policy and program requirements for the preparation and implementation of the Environmental Protection Agency's (EPA) Quality Program;
- is consistent with the principles in the American Society for Quality (ASQ)/American National Standards Institute (ANSI) E4:2014, *Quality management systems for environmental information and technology programs— Requirements with guidance for use*;
- recognizes existing quality policies, procedures, standards, and guidance as the foundation of the EPA Quality Program; and
- provides a structure to ensure and enhance the effectiveness of the Quality Program and its application to environmental information and technology.

This Policy affirms:
- EPA's commitment to applying quality principles and practices to environmental information and technology programs;
- EPA's commitment to utilizing environmental information of known and documented quality, scientifically valid, legally defensible, and appropriate for the intended use;
- the EPA Chief Information Officer's (CIO) responsibility, as the Deputy Assistant Administrator (DAA) for Information Technology/Information Management (IT/IM) within the Office of Mission Support (OMS) and the designated federal official for quality at EPA, to lead, coordinate, and maintain an effective Quality Program throughout EPA;
- the DAA for IT/IM/CIO and the CIO Strategic Advisory Council's (SAC) leadership of EPA's Quality Program in assuring the quality of environmental information and technology; and the roles of other key Agency managers and organizations that are implementing quality policies and practices for collection, production, evaluation, or use of environmental information across Agency programs.

2.   SCOPE

This Policy defines the minimum requirements for the Quality Program supporting EPA environmental programs unless superseded by statutory requirements. Environmental programs encompass the collection, production, evaluation, or use of environmental information by or for EPA and the design, construction, operation or application of environmental technology by EPA. Collectively these activities are referred to as environmental information operations.

3. **AUDIENCE**

The audience for this Policy is all Agency employees responsible for environmental information operations. This includes EPA Program Offices, Regions, and their sub-organizations hereafter referred to as EPA organizations.

This policy applies only to EPA organizations unless non-EPA organizations are performing work in support of EPA's mission or national program priorities as defined by and in accordance with:
- federal laws,
- regulations,
- extramural agreements, or
- performing work on a voluntary basis under agreement with EPA.

In these circumstances, this Policy, including the requirement for a Quality Management Plan (QMP), will be applied to non-EPA organizations as described in the current version of:
- The EPA organizations' QMP that is sponsoring the work,
- *Environmental Information Quality Procedure*[1], and/or
- *Quality Management Plan (QMP) Standard*[2], and/or
- *Quality Assurance Project Plan (QAPP) Standard*[3].

Non-EPA organizations include but are not limited to:
- contractors,
- regulated parties,
- cooperative agreement holders, grantees,
- states, tribes, localities, intergovernmental organizations,
- educational institutions, hospitals, non-profits,
- as negotiated with other federal governmental agencies, and parties to Memoranda of Agreement or Understanding
- volunteer organizations,
- and other environmental information providers

4. **AUTHORITY**

These citations are valid at the time of issuance of this Policy. Since these documents are subject to periodic review, users of this Policy should refer to the most recent version.

- [U.S.C. App.; Pub. L. 98–80, 84 Stat. 2086 (Reorganization Plan No. 3 of 1970)](#)
- [National Technology Transfer and Advancement Act (NTTA), (PL 104-113)](#)

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[1] *The current version of this directive is located at [IT/IM Directives](#).*

[2] *The current version of this document is available at https://www.epa.gov/irmpoli8/quality-management-plan-qmp-standard.*

[3] *The current version of this document is available at https://www.epa.gov/irmpoli8/quality-assurance-project-plan-qapp-standard.*

- [Clinger-Cohen Act of 1996 (PL 104-106)](#)
- [1-41. Mandatory Quality Program Delegation 1200 TN 496 1-41](#)
- [Office of Management and Budget (OMB) Circular A-130, Managing Information](#) [as a Strategic Resource](#)
- [Information Quality Act (IQA), Section 515 of Treasury and Government Appropriations Act, 2001 (PL 106-554, 31 USC 3516) (Refer to Page 114 STAT.](#) [2763A-154)](#)
- [2 CFR 1500.12: Uniform Administration Requirements, Cost Principles and Audit](#) [Requirements for Federal Awards, Quality Assurance](#)
- [40 CFR Part 35: State and Local Assistance](#)
- [48 CFR Part 46: Quality Assurance](#)

5.   POLICY

This Policy outlines EPA's Quality Program requirements to support EPA's mission to protect human health and the environment and to ensure environmental information operations products and services are of known and documented quality for their intended use(s). It defines the DAA for IT/IM/CIO's role in leading the Agency Quality Program and recognizes and builds upon existing environmental information operations quality-related policies, procedures, and activities implemented across the Agency. This Policy ensures a comprehensive and coordinated approach for consistent implementation of continuous improvement in the quality of EPA's environmental information operations. Also, all environmental information operations performed for the Agency must comply with this Policy as described in Section 3. Audience.

This Policy requires EPA organizations to develop, implement, and maintain a Quality Program. Each EPA organization covered by the scope of this Policy must:

A. **Assign a Quality Assurance Manager (QAM).** The title of this position may vary by organizational structure [e.g., Director of Quality Assurance (DQA) or Regional Quality Assurance Manager (RQAM)]. For this Policy, this position will be referred to as the QAM. The QAM will function independently of direct environmental information operations. The QAM must have Quality Management expertise, and the authority to conduct independent oversight of the organization's Quality Program. They will report on quality issues to senior managers having executive leadership authority for the organization.

B. **Develop a Quality Management Plan (QMP).** Describe and document their Quality Program in a QMP consistent with the most current version of the *QMP Standard*. The QMP describes the organization's Quality Program. It documents how the organization structures its Quality Program and describes its quality policies and procedures; criteria for and areas of application; and roles, responsibilities, and authorities. It also describes an organization's policies and procedures for implementing and assessing the effectiveness of the Quality Program. The QMP must document all technical activities to be performed under the Quality Program and how the program will integrate quality assurance (QA) and quality control (QC) procedures and plans into all

its environmental information operations activities.

Approval of an EPA organization's QMP requires signatures by their senior leadership and the DAA for IT/IM/CIO. The DAA for IT/IM/CIO may redelegate this authority as defined in the current version of 1-41. Mandatory Quality Program.

C. **Provide for Resources.** Ensure resources are available to implement the Quality Program as defined in their QMP, including QA resources required for extramural activities in support of EPA.

D. **Conduct Systematic Planning.** Document the processes for systematic planning and use them to develop acceptance or performance criteria and to perform all environmental information operations. The planning process shall be based on a graded approach.

E. **Prepare Quality Assurance Project Plan Documentation.** Document the output of systematic planning in a Quality Assurance Project Plan (QAPP) or equivalent document (in this Policy referred to as a QAPP) and approve them for use. Document the plan for environmental information operations in a QAPP consistent with the current version of the *QAPP Standard*, as required for each environmental information project. EPA QAMs, as defined by the organization's QMP, review and approve QAPPs for all applicable environmental information operations projects prior to any data gathering work, or use, except under circumstances requiring immediate action to protect human health and the environment or operations conducted under police powers.

F. **Develop Directives.** Develop, maintain, or adopt and implement for their organization appropriate Quality Program related policies, procedures, standards, and guidance pertaining to all environmental information operations.

G. **Execute Assessments.** Plan, conduct, and document assessments and audits to provide information on the effectiveness of the Quality Program in accordance with the procedures described in their QMP and supporting QAPPs. Quality processes are updated based on the results of these assessments.

Hold Quality Program Management Reviews. Plan, conduct, and document management reviews of the Quality Program in accordance with the procedures described in the organization's QMP to assess its effectiveness and institute improvements. Annual performance of these reviews and timely action on the results demonstrates senior management commitment to implementation of the Quality Program.

H. **Identify Corrective Actions and Improvements.** Perform and document corrective actions and improvements.

I. **Conduct Reporting.** Report annually QA/QC activities for the previous fiscal year (FY) and those activities planned for the upcoming FY to the CIO. Provide this information as described in the most current version of the *Environmental Information Quality Procedure* and the annual reporting data call from the CIO. This reporting of QA activities provides EPA managers access to information that summarizes the results of having implemented the quality program.

J. **Evaluate Information using the Information Quality Guidelines (Pre-Dissemination Review).** Plan for and assess all environmental information prior to use in supporting Agency actions or decisions to verify the information is of sufficient quality, objectivity, utility and integrity for their intended use and purpose.

Ensure information disseminated by or for EPA conforms with the *Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility and Integrity of Information Disseminated by the Environmental Protection Agency[4]* (EPA IQGs).

Retain documentation of pre-dissemination review performed on disseminated information products.

K. **Document Quality Program Requirements for Intramural (Internal) projects and Extramural Agreements.** EPA organizations shall identify projects and extramural agreements that may be subject to the Quality Policy and document this determination. For those that are, identify and document approval of Quality Program documentation and strategies needed to support the objectives.

L. **Address Field Activities.** Implement the requirements as described in the current version of the *EPA QA Field Activities Procedure[5]*.

M. **Address Environmental Information Quality Issues.** Implement the CIO notification process described in the current version of the *CIO Notification Procedure for Environmental Data Quality Issues[6]*.

N. **Conduct Training.** Require appropriate training for all personnel to assure that QA and QC responsibilities and requirements of the Quality Program are understood.

O. **Review Reports.** Published Agency reports containing environmental information shall be accompanied by a readily identifiable section or appendix that discusses the quality of the data and any limitations on the use of the data with respect to their original intended application. This requirement does

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[4] *https://www.epa.gov/quality/guidelines-ensuring-and-maximizing-quality-objectivity-utility-and-integrity-information*.
[5] *The current version of this directive is located at IT/IM Directives.*
[6] *The current version of this directive is located at IT/IM Directives.*

not apply to papers, journal articles, etc., that undergo peer review processes external to EPA. Agency reports shall be reviewed by the QA manager (or other authorized official) before publication to ensure that an adequate discussion of QA and QC activities is enclosed.

P. **Assess environmental information.** When used to support Agency decisions or for purposes other than the original intent, an assessment will be performed to verify that the environmental information is of sufficient quantity and adequate quality for the intended use.

6. ROLES AND RESPONSIBILITIES

EPA Administrator: Promotes and ensures quality is an integral part of the Agency's mission by assuring that environmental information operations supporting EPA's programs and activities are of known and documented quality, scientifically valid, legally defensible, and appropriate for the intended use. The Administrator may re-delegate the responsibilities for this Policy to Assistant Administrators (AA) and Regional Administrators (RAs).

Assistant Administrators (AA) and Regional Administrators (RA): Each AA and RA is responsible for the following QA activities:

- Implementing this Policy in the context of the organization's specific mission;
- Ensuring that adequate resources are devoted to QA activities to ensure compliance with EPA's QA directives, to support the organization's mission and to fully implement the organization's approved QMP;
- Ensuring that the organization's QMP includes activities that will help assure the quality of the information the organization collects, manages, or uses in carrying out its mission;
- Providing reasonable assurance and certifying annually to the DAA for IT/IM/CIO that their organization has implemented this policy and have internal controls in place to ensure that environmental information produced and utilized is of known and documented quality for the intended use. Provide this certification, along with the organization's QA annual report to the Enterprise Quality Management Division (EQMD). The AA/RA may re-delegate the responsibilities for certification to the appropriate manager or supervisor; and
- Promoting continuous improvement in QA activities across the organization.

Office of Mission Support (OMS), Deputy Assistant Administrator (DAA) for Information Technology/Information Management (IT/IM)/Chief Information Officer (CIO): Acts as the EPA Senior Management Official for quality management and leads Agency-wide implementation of this Policy and EPA's Quality Program. Informs AAs, RAs, and the SAC of any issues related to the quality of Agency environmental information and environmental information operations encompassed by this Policy.

Chief Information Officer's (CIO's) Strategic Advisory Council (SAC): Consisting of Senior Information Officials (SIOs) and other senior managers, the SAC advises and reports to the DAA for IT/IM/CIO on Agency-wide environmental information operations. The SAC serves as a forum to discuss coordination of cross-cutting Agency quality-related issues.

Senior Information Officials (SIOs): Oversee effective implementation, coordination, and management of the organization's Quality Program for environmental information operations. Located in each Program Office and Region, SIOs report to the Agency DAA for IT/IM/CIO on quality-related issues.

National Program Office Directors: Provide Program direction to the Regional Program Office Directors on National Program Office quality assurance guidance.

Mission Support Division Directors (MSDDs): Manage issues related to information technology and information management (IT/IM). Support the Region's Quality Program and coordinate with Laboratory Services and Applied Science Division Directors (LSASDDs).

Laboratory Services and Applied Science Division Directors (LSASDDs): Serve as Director of a Regional Division with oversight of the Regional Quality Program through direct management oversight of the Regional QA personnel including the Regional QAM (RQAM). Through this oversight the LSASDD ensures conformance with this Policy and Regional QMPs.

Science and Technology Policy Council (STPC): Serves as a mechanism for addressing EPA's science policy issues that go beyond regional and program boundaries, with a goal of integrating policies that guide Agency decision-makers on their use of scientific and technical information.

The STPC is an executive-level council that is chaired by the Agency's Science Advisor, and provides a venue for identifying, coordinating, and, when appropriate, establishing consensus for high priority, cross-agency science and technology policy issues focusing on issues that require high-level action and are relevant to the Regions and Program Offices (such as: Peer Review, Public Access, and Risk Assessment).

Office of General Counsel and Offices of Regional Counsel: Provide legal advice on issues related to environmental information operations.

OMS, Office of Records, Administrative Systems and eDiscovery (ORASE) and Enterprise Quality Management Division (EQMD) Directors: Serve as Office and Division Directors respectively and are responsible for oversight of the Agency's Quality Program. Execute actions on behalf of the DAA for IT/IM/CIO according to Delegation 1-41. Mandatory Quality Program.

EPA Quality Assurance Managers (QAMs) or designees: Have delegated authority for the management of the Quality Program as described in their organization's QMP. Organizations may re-delegate the QAM's responsibilities as described in their QMP.

Agency Personnel: Perform work associated with environmental information operations as identified in their organization's QMP.

Recipients of Extramural Agreements: Perform all environmental information operations in accordance with this Policy's requirements as defined by federal laws, regulations, and their extramural agreements. The agreement terms and conditions may also specify applicability of the EPA lead organization's QMP.

7. RELATED INFORMATION

These citations are valid at the time of issuance of this Policy. Since these documents are subject to periodic review, users of this Policy should refer to the current version.

OMS Links:
- Environmental Information Quality Procedure
- EPA QA Field Activities Procedure
- CIO Notification Procedure for Environmental Data Quality Issues
- Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Environmental Protection Agency
- Enterprise Architecture Policy
- Data Standards Policy
- Enterprise Data Management Policy
- Quality Management Plan Standard
- Quality Assurance Project Plan Standard

Other EPA/External Links:
- ASQ/ANSI E4, *Quality management systems for environmental information and technology programs—Requirements with guidance for use* (2014)
- U.S. EPA Scientific Integrity Policy
- U.S. EPA Peer Review Handbook

8. DEFINITIONS

While this Policy uses multiple sources as the foundation for the terms defined, ASQ/ANSI E4 (2014), the previous CIO 2105, and the now superseded CIO 2106 served as primary references. The intent of this Policy is to ensure consistency with these primary references and to make modifications where necessary to be applicable to the Agency.

Assessment—The evaluation process used to measure the performance or effectiveness of a system and its elements. As used here, assessment is an all-inclusive term used to denote any of the following: audit, performance evaluation, management review, peer review, inspection, surveillance, or readiness review (including competency assessment, pre-award assessment of proposal, or technical assessment), peer consultation, product review (e.g., data inspection, software testing, pre-dissemination review, or review of contractor deliverables).

Audit—A systematic and independent examination to determine whether quality activities and related results comply with documented planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.

Consensus Standards—Standards that are developed and adopted by achieving agreement with all affected parties. These standards are developed in accordance with procedures used by the International Organization for Standardization or organizations accredited by the ANSI.

Data—A quantitative or qualitative representation of values, facts, observations, or ideas in a formalized manner capable of being transmitted, processed, stored, analyzed, interpreted, and/or communicated by some process, whether on paper or in electronic form.

- **Qualitative data**—is descriptive.

- **Quantitative data**—is numerical.

- **Primary data**—are data observed, collected, stored, or generated directly for a specific purpose.

- **Existing data**—are data that have been collected, derived, stored, or reported in the past or by other parties (for a different purpose and/or using different methods and quality criteria). Sometimes referred to as data from other sources.

- **Metadata**— Metadata is structured information that describes, explains, locates, or otherwise makes it easier to retrieve, use, or manage an information resource.

Data Standard—Documented consensus-based agreement on the format and definition of common data.

Environmental Information—Includes data and information that describe environmental processes or conditions which support EPA's mission of protecting human health and the environment. Examples include but are not limited to:
- direct measurements of environmental parameters or processes;
- analytical testing results of environmental conditions (e.g., geophysical or hydrological 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; and
- design, construction, and operation or application of environmental technology.

![EPA logo] **EPA**

IT/IM DIRECTIVE
POLICY

Directive No: CIO 2105.4

Issued by the EPA Chief Information Officer,
Pursuant to Delegation 1-19

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

Environmental Measurement—A subgroup of Environmental Information that includes or produces values derived from tools, instruments, observational results, laboratory operations on environmental samples, or other sampling and testing equipment. It is any data collection activity or investigation involving the assessment of chemical, physical, or biological factors in the environment which affect human health and the environment.

Environmental Processes—Manufactured or natural processes that produce discharges or that impact human health and the environment.

Environmental Programs—Work or activities involving the environment, including but not limited to, characterization of environmental processes and conditions; environmental monitoring; environmental research and development; the design, construction, operation or application of environmental technologies; and laboratory operations on environmental samples.

Environmental Technology—An all-inclusive term for systems, devices and their components applicable to both hardware and methods or techniques that measure and/or remove pollutants or contaminants and/or prevent them from entering the environment.

Examples include but are not limited to:
- Pollution prevention: measurement, monitoring, reduction, control, and/or treatment processes; such as wet scrubbers (air), granulated activated carbon unit (water), filtration (air, water).
- Contamination: containment to prevent further movement of the contaminants, such as capping, and solidification or vitrification, and biological treatment.
- Storage containers, methods, or facilities; such as drums, tanks, and pond or lagoon.
- Remediation processes and their components, and/or technologies; such as contaminant removal and replacement with backfill, soil washing (soil), pump and treatment, soil vapor extraction (soil), land farming and other bioremediation processes.

Environmental Technology does not include or incorporate QA associated with the development and design of IT systems.

Extramural Agreement—A legal agreement between EPA and a non-EPA organization. Such agreements include but are not limited to contracts, work assignments, delivery orders, task orders, cooperative agreements, research grants, state and local grants, and EPA-funded interagency agreements and as negotiated in other agreements not funded by EPA. Refer to the *Environmental Information Quality Procedure* for additional details related to QA documentation associated with extramural agreements.

Graded Approach—The process of determining the level of detail for management controls to be applied to an activity according to the intended use and the degree of confidence needed in the quality of the results. This approach establishes the QA and QC requirements commensurate with the importance of the work, the available resources, and the unique needs of the organization.

Intergovernmental⸺ Between the EPA and international, other federal, state, tribal, territorial, area-wide, regional or local governments and agencies.

Management System—A management system may describe the policies, objectives, principles, organizational authority, responsibilities, accountability, and implementation plan of an organization.

Organization—An EPA organization is an office, region, national center, or laboratory. An external organization is a state, tribe, agency or other government entity, academia, company, corporation, firm, enterprise, or institution, or part thereof, whether incorporated or not, public or private, that has its own functions and administration.

Process—A set of interrelated resources and activities which transforms inputs into outputs. Examples of processes include analysis, design, data collection, operation, fabrication, and calculation.

Product—The intended result or final output of an activity or process that is disseminated or distributed among EPA organizations or outside of EPA.

Quality—The totality of processes, procedures, features, and characteristics of a product or service that bear 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 Assurance Manager (QAM)—The individual designated as the principal manager within the organization having oversight authority and responsibilities for planning, documenting, coordinating, and assessing the effectiveness of the Quality Program for the organization.

Quality Assurance Project Plan (QAPP)—A planning document related to a project or program 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 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 Management—The aspects of the organization's overall management system that drive the implementation of an organization's Quality Program. Quality Management includes strategic planning, allocation of resources, and other systematic activities (e.g., planning, implementation, documentation, and assessment) pertaining to an organization's Quality Program.

Quality Management Plan (QMP)—A formal document that describes a Quality Program in terms of the organizational structure, functional responsibilities of management and staff, 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 EPA's planning, implementation, and assessment for ensuring the quality of Agency environmental information operations products and services.

9.   WAIVERS

Statutory requirements for quality may supersede the specifications in this Policy or be more rigorous. In such cases, affected programs shall be exempt from the requirements of this Policy. EPA organizations conducting exempted activities shall comply with the *Environmental Information Quality Policy* in all other respects. The following exemptions from these requirements apply:

- The collection of environmental data under the authority of Good Laboratory Practices as defined by 40 CFR 792, for the Toxic Substances Control Act.

- The collection of environmental data under the authority of Good Laboratory Practices as defined by 40 CFR 160, for the Federal Insecticide, Fungicide, and Rodenticide Act

10.   DIRECTIVE(S) SUPERSEDED

- *Policy and Program Requirements for the Mandatory Agency-Wide Quality Management System* (CIO 2105.0, May 5, 2000)
- *EPA Quality Manual for Environmental Programs* (CIO 2105-P-01-0, May 5, 2000)
- *Quality Policy* (CIO 2106.0, October 20, 2008)
- CIO Clarification Memorandum, Subject: EPA Quality Policy (CIO 2106.0, December 10, 2010)
- Environmental Information Quality Policy (CIO 2105.2, July 19, 2022)

11.   CONTACTS

For information about this Policy or the Quality Program, please contact the Office of Mission Support, Information Technology/Information Management, Office of Records, Administrative Systems and eDiscovery, Enterprise Quality Management Division, or email quality@epa.gov.

***Vaughn Noga, Chief Information Officer and Deputy Assistant Administrator
for Information Technology and Information Management***

APPENDIX A:
ACRONYMS & ABBREVIATIONS

AA	Assistant Administrator
ANSI	American National Standards Institute
ASQ	American Society for Quality
CFR	Code of Federal Regulations
CIO	Chief Information Officer
DAA	Deputy Assistant Administrator
DQA	Director of Quality Assurance
EI	Environmental Information
EPA	Environmental Protection Agency
EQMD	Enterprise Quality Management Division
FMFIA	Federal Managers Financial Integrity Act
FY	Fiscal Year
IM	Information Management
IQA	Information Quality Act
IQG	Information Quality Guidelines
IT	Information Technology
LSASDD	Laboratory Services and Applied Science Division Director
MSDD	Mission Support Division Director
NTTA	National Technology Transfer and Advancement Act
OMB	Office of Management and Budget
OMS	Office of Mission Support
ORASE	Office of Records, Administrative Systems and eDiscovery
PL	Public Law
QA	Quality Assurance
QAM	Quality Assurance Manager
QAPP	Quality Assurance Project Plan
QC	Quality Control
QMP	Quality Management Plan
RA	Regional Administrator
RQAM	Regional Quality Assurance Manager
SAC	Strategic Advisory Council
SIO	Senior Information Official
STPC	Science and Technology Policy Council
USC	United States Code