POLICY TO ASSURE COMPETENCY OF ORGANIZATIONS CONDUCTING ENVIRONMENTAL INFORMATION OPERATIONS AND GENERATING ENVIRONMENTAL INFORMATION UNDER AGENCY-FUNDED ACQUISITIONS

Agency Policy Directive: April 8, 2025 Clean-up Revision: August 25, 2025

PURPOSE

This document establishes the U.S. Environmental Protection Agency's (EPA's or the Agency's) policy requiring that organizations (e.g., laboratories, field sampling and measurement organizations) conducting environmental information operations¹ and generating environmental information through analysis under Agency-funded acquisitions must submit documentation of their competency. This may include participation in applicable certification and/or accreditation programs.

EFFECTIVE DATE

This Policy is effective for five years from August 25, 2025. The Policy shall be reviewed prior to its five years effective term, and will either be reissued without revision, reissued with revisions, or rescinded.

DEFINITIONS

Accreditation – As defined by the International Organization for Standardization (ISO) https://www.iso.org/certification.html, accreditation is the formal recognition by an independent body, generally known as an accreditation body, that a certification body operates according to international standards.

Certification – As defined by the ISO (https://www.iso.org/certification.html), certification is the provision by an independent body of written assurance (a certificate) that the product, service or system in question meets specific requirements.

Competence – The demonstrated ability to apply knowledge and skills. Some examples for specific discipline areas can be found using the ISO Online Browsing Platform (OBP), Terms & Definitions, https://www.iso.org/obp/ui.

APPLICABILITY

This Policy applies to all EPA programs (e.g., Program Offices, Regional Offices, Laboratories) and their sub-programs responsible for evaluating, issuing, and/or

¹ As defined in the US *Environmental Protection Agency Environmental Information Quality Policy* (CIO 2105), environmental information operations is a collective term for work performed to collect, produce, evaluate, or use environmental information and the design, construction, operation or application of environmental technology, and environmental information includes data and information that describe environmental processes or conditions which support EPA's mission of protecting human health and the environment.

managing Agency acquisitions such as purchases, contracts and contract task orders. This is an additional requirement to be implemented by contracting personnel in consultation with the organization sponsoring the work for acquisitions generating environmental information. In no way does this policy prohibit an Agency program from placing additional requirements or stipulations to meet the needs of their work being performed.

The scope of this Policy encompasses organizations which conduct environmental information operations and generate environmental information under:

- New Agency acquisition requests for proposals and requests for quotes.
- New approved purchases, contracts, task orders, and such.

BACKGROUND/AUTHORITY

The EPA Science Policy Council, reconstituted in July 2010 as the Science and Technology Policy Council (STPC), established the Forum on Environmental Measurements (FEM or the Forum). During its tenure as a standing committee from 2004 – 2019, it was a primary goal of the Forum to promote national accreditation. Accreditation is a means to ensure that organizations are technically competent and have effective Quality Program management, enabling them to generate valid environmental information. After years of working with communities that operate accreditation programs and encouraging private, public, and State programs to be accredited, the Agency issued a policy to assure the competency of EPA laboratories in 2004. The document may be found at: https://www.epa.gov/measurements-modeling/measurement-competency-documents.

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

While the FEM was dissolved in 2019, in 2025, the STPC convened and charged an ad hoc working group to review the policies, and either reaffirm or revise them, as appropriate. As a result, this policy is being reaffirmed.

REQUIREMENTS

Organizations performing environmental analysis for the Agency shall demonstrate their

qualifications in the fields of analyses to be conducted, prior to performing such analyses.

Demonstration of competency may include (but not be limited to):

- Current participation in accreditation or certification programs that are applicable to the environmental information generated under the Agency-funded acquisitions.
- Ongoing participation by the recipient organization in proficiency testing (PT) or round robin programs conducted by external organizations.
- Ongoing EPA accepted demonstrations and audits/assessments of proficiency; and other pertinent documentation that demonstrates competency (e.g., past performance to similar statement of work [SOW]).

Acquisition solicitations and agreements will include applicable provisions and terms and conditions.

REFERENCES

- Environmental Protection Agency Acquisition Regulation (EPAAR)
- EPA CIO 2105 Environmental Information Quality Policy, https://www.epa.gov/quality/quality-program-directives#policy
- EPA CIO 2105-P-01 *EPA Environmental Information Quality Procedure*, https://www.epa.gov/quality/quality-program-directives#policy
- FEM Lab Competency and Accreditation Policies, https://www.epa.gov/measurements-modeling/ensuring-measurementcompetency.