

# **Sub-Tier Participant Audits**



**TCEQ CRP QUALITY ASSURANCE WORKSHOP**



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# Presentation Overview



## Part 1 - Introduction

What are the applicable CRP requirements

What are Sub-Tier Participant Audits

Why do we do Sub-Tier Participant Audits

## Part 2 - Open Discussion

How to conduct a Sub-Tier Participant Audit

Audit Findings and Responses

Corrective Actions

# CRP Requirements



- CRP requires planning agencies to conduct “oversight” of project participant(s)
- This is accomplished through sub-tier participant audits
- Audit finding(s) and response(s) are submitted as a Task 2 Deliverable(s)
- These deliverables are not required if the planning agency performs all contract work

# What are Sub-Tier Participant Audits?



- Inspection/review of a partner's adherence to applicable QAPP and/or SOP requirements as they pertain to work conducted under the CRP
- There are two types:
  - **Readiness Review**
    - ✦ Typically associated with a brand new partner
    - ✦ May also be associated with an existing partner if there are significant changes to scope of work and/or technology used
  - **Monitoring Systems Audit**
    - ✦ Typically associated with an existing, established partner
    - ✦ Much more in-depth audit

# Why Conduct Sub-Tier Participant Audits?



- Sub-Tier Participant Audits help:
  - Ensure compliance/adherence to the QAPP
  - Ensure data is being collected according to SWQM Procedures
  - Ensure laboratory data meets all QA requirements
  - Prevent long-term gaps in QA
  - Promote positive working relationships with partners
- Audits tend to have a negative connotation associated with them:
  - Audits are meant to help strengthen/maintain QA
  - Audits are **NOT** meant to be “witch hunts”

# How to Conduct a Sub-Tier Participant Audit



- Decide when you would like to perform the audit
  - Each participant must be audited once per contract cycle
  - Suggestion: Conduct the audit every other year
- Give the participant plenty of notice
  - Hard to determine participants schedule
  - Suggestion: Three month window
- Make sure everyone is on the same page
  - Send them a letter notifying them of the upcoming audit
  - Suggestion: Utilize a format similar to what TCEQ uses when performing an onsite assessment of your monitoring program

# How to Conduct a Sub-Tier Participant Audit, Continued



- Evaluate the Participant's Scope of Work
  - Which areas of the program is the participant most involved
  - Review any corrective actions from the previous year
  - Review the previous Sub-Tier Participant Audit
  - Is a desk-top review approach appropriate
- Review the CRP Audit Checklist
  - Determine the most applicable sections
  - What areas have the most impact on data
  - Prioritize
- Develop an Audit Plan
  - Have a plan, but be flexible

# How to Conduct a Sub-Tier Participant Audit, Continued



- During the Audit
  - Highlight Audit Checklist sections you want to cover
  - Mark sections of the SWQM Procedures Manual you may want to reference
  - Take plenty of notes and/or make plenty of copies while you're there to prevent requesting them afterwards
    - ✦ Field data sheets, calibration logs, training records, etc.
  - Don't be afraid to make copies of documents to use in your audit findings (these can be positive too)
  - Don't be afraid to make suggestions, ask questions
  - Don't be afraid to identify non-conformances



# Audit Findings and Responses



- **Positive Findings**
  - Always try to include more than one
- **Negative Findings**
  - Always try to have documentation to attach to the report should there be negative findings
  - Always try to provide suggestions as to how the participant could correct the problem
- **Responses**
  - Must be provided in writing no more than thirty (30) days after the Audit Findings are received

# Corrective Actions



- Some audit findings may lead to corrective actions
  - Staff training was not documented by the QAO
  - Calibration records were incomplete or inaccurate
- Treat corrective actions and audit responses independently
  - An audit finding may lead to a corrective action, and a corrective action may even be part of an audit response, but a corrective action cannot be used in place of an audit response
- Some audit findings may lead to data being lost
  - There will be corrective actions, and data may be lost
  - Use this as a learning tool to prevent future reoccurrences

# Questions?



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