



**GEOSCIENCES AND ENGINEERING DIVISION
QUALITY ASSURANCE
SURVEILLANCE REPORT**

PROJECT NO. All

REPORT No.: 2007-13

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SURVEILLANCE SCOPE: GED Personnel Qualification, Training, and Conflict of Interest (COI)

REFERENCE DOCUMENTS:

QAP-005, *Quality Indoctrination and Training*

QAP-007, *Professional Personnel Qualification*

AP-001, *Evaluation of Potential Conflict of Interest*

START DATE:

5/4/07

END DATE:

5/7/07

QA REPRESENTATIVE:

M. Simpson

PERSONS CONDUCTING ACTIVITY (person contacted): M. Padilla

SATISFACTORY FINDINGS (General Observations):

Twenty personnel records packages were randomly selected for review. With the exception of the situation described under Recommendation below, all required personnel qualification, training, and COI records were accounted for and current for the reviewed staff members and associated personnel. Note: only GED-specific training was assessed for this surveillance.

Two document control/records management support staff are responsible for coordination of these programmatic elements. They maintain a database of all GED and SwRI staff as well as consultants and subcontractors. Personnel records packages are pulled from the file each month (based on individual start dates) for review and update. GED personnel are reassessed for qualification and training. In addition, COI status is included in the reassessment of external staff. Records review for current personnel qualification, training, and COI is also performed as part of organizational surveillances.

Quality Assurance (QA) indoctrination is usually accomplished by classroom training sessions presented by the GED QA Director. This introduction to the QA program offers a comprehensive overview of the program and the general regulatory framework of the Division's work. It is usually presented individually upon hire/assignment (including follow-up) and collectively after major changes to the GED QA Manual.

Training is mostly provided electronically; by read and acknowledge. This approach appears to be successful as no indicators suggest otherwise.

COI reviews are consistently and diligently performed by the Source Evaluation Committee (SEC) as described in the procedure. Much care is taken in this process to preclude the assignment of personnel with a COI. A Recommendation in this area is described below.

UNSATISFACTORY FINDINGS: None

NCR NO.: None

CAR NO.: None

ATTACHMENTS: None

RECOMMENDATIONS:

1. QAP-007, Section 3.2 states that instructions for completing Form QAP-11 are on the form's reverse but this is not the case. The procedure itself provides the instructions. Suggest deletion of this statement during the next revision of the procedure.

2. Records packages for some managers and directors do not have documentation of the most recent annual manager's assessment of required training (on Form QAP-11-1). The records mgt. coordinator stated that because these personnel are assigned all available training, no further review of their training needs was necessary. In some cases "NA" has been entered in place of the manager's initials but in at least one case (E. Pearcy) the form was left blank. While the coordinator's argument may have merit, no such exclusion exists procedurally. It is also possible that additional training beyond the norm could be assigned to a specific manager/director. Suggest obtaining the necessary reviews or revising QAP-007 to provide for this exclusion.

3. A recent SEC evaluation discovered that work for a potentially conflicted organization was not disclosed by the prospective consultant. Most SEC reviews do not search for information beyond that provided by the applicant. Suggest a provision in AP-001 to provide for independent due diligence (i.e., web searches, etc.) when appropriate.

APPROVED:

Ind. Secret

DATE:

5/11/2007

DISTRIBUTION:

ORIGINAL—QA RECORDS

DIRECTOR, QA

ASSISTANT DIRECTOR: All

MANAGER: All

PRINCIPAL INVESTIGATOR: NA