DoD Advanced Geophysical Classification Accreditation Program Frequently Asked Questions

1. Where can I obtain an application for accreditation?

Answer: Contact the AB (American Association for Laboratory Accreditation (A2LA) (https://www.a2la.org/) or Laboratory Accreditation Bureau (L-A-B) (https://www.l-a-b.com/) of your choice directly for an application.

2. How should a GCO proceed if it disputes an AB's finding related to an assessment?

Answer: The GCO should dispute findings using the AB's dispute resolution process. This is a component of the AB's quality system as required by ISO/IEC 17011. If the dispute involves a DoD-specific requirement and the GCO believes the dispute resolution decision by the AB is unacceptable, then the GCO may appeal the decision to the EDQW. The EDQW will be the final authority on interpretation of the DoD QSR. The EDQW will not overrule AB decisions related to interpretation of any ISO/IEC 17025 requirement as long as the QSR has not specifically clarified that requirement.

3. Whom should a GCO contact to obtain clarification of ISO/IEC 17025 requirements? Of DoD QSR requirements?

Answer: GCOs having general questions about DAGCAP or the DoD QSR may contact the EDQW through the DENIX website. GCOs having questions about ISO/IEC 17025 should contact their AB. GCOs having a question related to any written finding issued by an AB must follow the AB's dispute resolution process.

4. If a GCO operates in multiple locations or offices, will each location require its own accreditation?

Answer: Contact your AB to determine whether each location will require its own accreditation or a single certificate can be issued. At a minimum, if a single accreditation certificate is to be issued, all locations must operate under the same quality system.

5. How is the DoD QSR to be used?

Answer: The DoD QSR is intended for use by <u>organizations seeking to become accredited, or to maintain accreditation</u>, in accordance with the DoD Advanced Geophysical Classification Accreditation Program, which is based on the international standard, ISO/IEC 17025:2005. The DoD QSR provides requirements, clarification, and guidance that supplement ISO/IEC 17025. In other words, organizations must meet all "applicable" requirements of ISO/IEC 17025 <u>plus</u> the additional requirements contained in the QSR. For example, ISO/IEC 17025 paragraph 4.15.1 describes all the elements that must be addressed during management reviews. The DoD QSR paragraph 4.15.1 provides the following requirements, in addition to the ISO requirements: "Management reviews shall be conducted at least once every year. Management reviews shall include evaluation of ongoing performance on validation seeds. Management reviews may be conducted in phases." If

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an organization has not received any contract awards, and has not had the opportunity to be tested using validation seeds, then that requirement will not be "applicable".

6. Why not include the ISO/IEC text in the DoD QSR?

Answer: The ISO standard is protected by copyright. Organizations must purchase a copy (or copies) of the ISO standard for their own use.

7. Some of the terminology used in the DoD QSR is unfamiliar (e.g. "management system", "top management", etc.)

Answer: For the sake of consistency, the numbering system, headings, and terminology used in the ISO standard are retained in the DoD QSR. Ongoing training and outreach initiatives will include the definitions of such terminology.

8. Appendix C: Requirements for Monitoring and Reporting Ongoing Performance on Validation Seeds seems to be overly rigid. Why is it necessary to stop work when it's possible a government error could be possible for a missed validation seed?

Answer: To garner regulatory approval of the technology, the quality systems requirements developed for advanced classification described in the GCMR-QAPP template have been designed to make it highly unlikely that an accredited GCO will miss a validation seed when the GCO's quality system is functioning as written. Similarly, government requirements for validation seed placement described in the government's Quality Assurance Surveillance Plan (QASP) make it highly unlikely that a failure will result from a government error. Failure to detect or correctly classify a validation seed is a very serious issue, and one that warrants a stop-work order so that all possible reasons for the failure can be promptly investigated and corrected.

9. Some of the examples of activities presented in Appendix D: Prohibited Practices, are not necessarily falsification or misrepresentation.

Answer: There are two general categories of prohibited practices. 1) Those involving the deliberate fabrication, falsification, or misrepresentation of data, and 2) Those that could compromise the traceability and integrity of data. Practices such as erasing data files or renaming data files, without recording the reasons for doing so, compromise data integrity and traceability. To ensure data integrity and traceability, all original data must be retained. Any changes must be explained and documented with the date and initials of the person making the change. This practice is necessary to support implementation of the DoD Information Quality Guidelines.

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