Quality Plan for Coral Protection and Restoration Program

Florida Department of Environmental Protection

April 2025

Signature Page

The undersigned have read and understood this Quality Plan, are charged with managing and improving the quality system, and are responsible for ensuring that all staff properly execute the procedures discussed in the plan.

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Program Administrator

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X Brooke Robinson

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Grants & Contracts

X Kylie Morgan

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QA Officer

Introduction

The Department of Environmental Protection (DEP) Quality Assurance (QA) program involves the implementation of a management system (planning, review, training, and assessment) to ensure that data collection, generation, interpretation, reporting, evaluation and archiving are of sufficient quality to support Department decisions. The effectiveness of our QA program is dependent upon the actions of all DEP staff, from “front line” employees to management, meaning QA is a function distributed throughout our organization. One aspect of our program is to ensure that Department QA activities are carried out according to commitments made to the Environmental Protection Agency as enumerated in the DEP Quality Management Plan (QMP) (Revision 8, March 2018).

The DEP Secretary is committed to implementation of the quality assurance requirements in the QMP and as authorized at Section 403.0623, F.S., and Chapter 62-160, F.A.C. (the DEP QA Rule). It is the Secretary’s intent to carry out these obligations and requirements as described in the Department’s QA Directive, Directive 972 (Revision 11/1/2016).

In order to execute the components of the DEP QA Directive, the Coral Protection and Restoration Program has developed a quality system. This document describes the steps we take to ensure the scientific and legal defensibility of environmental data we generate or use. It details the process of planning, training, execution, assessment and corrective action we undertake to ensure that environmental data meets our established quality criteria.

Basic Elements of Our Quality Plan

Our Quality Plan explains both the process and criteria by which the quality system is managed. The plan is utilized as an instrument of internal communication to inform our staff of current and future quality assurance activities. It discusses how specific QA duties are assigned to responsible staff. We will revise our Quality Plan as needed, and will ensure the consistent application of procedures and criteria for the generation or use of our environmental data. The Quality Plan will also be used as a training document for new staff and as a reference for experienced personnel. The plan and its revisions also serve as an archival record of our formal quality system.

The elements of our plan are consistent with the Department’s QMP, QA Directive, and QA Rule (Chapter 62-160, F.A.C.). Our plan addresses all activities associated with data review of any type, including those activities associated with data storage.

We expect all CPR staff to read, understand, and follow the procedures and criteria as discussed in this plan, and to carry out their assigned responsibilities for effective utilization of our quality system.

Policy Statement

It is our unit's policy to:

- *Use scientifically valid and legally defensible data for our decisions affecting protection of the environment.*
- *Have and implement the Quality System described in this document.*
- *Adaptively manage our Quality System to be consistent with provisions of the DEP QMP.*
- *Ensure that each individual is properly trained to execute their assigned functions.*
- *Implement procedures to evaluate the quality of the data we use and to implement corrective actions when data do not meet our Data Quality Objectives.*
- *Periodically audit the performance and record-keeping practices of data generators we have responsibility for.*
- *Implement quality assurance procedures for the management of our data repositories.*
- *Perform a yearly systematic assessment of our quality assurance activities, including any corrective actions, with the findings submitted to the Aquatic Ecology and Quality Assurance Section.*

Ethics

All employees of the DEP Coral Protection and Restoration Program are held to high professional ethical standards in the performance of their duties. All employees are required to read, understand and sign an 'Ethics Statement' attesting to their commitment to honesty and integrity in performance of their duties. In addition, all employees are required to attend an annual ethics training class. Improper, unethical or illegal actions will be dealt with according to the published Administrative Directives of the Florida Department of Environmental Protection.

Organization and Responsibilities

Our unit resides within the Office of Resilience and Coastal Protection.

The mission of the Coral Protection and Restoration Program (CPR) is to holistically protect and restore Florida's Coral Reef (FCR) by:

- *Effectively administering state and federal funding for FCR priorities;*
- *Providing leadership for the Florida's disturbance response and recovery initiatives including:*
    - *stony coral tissue loss disease (SCTLD) response,*
    - *restoration of Florida's Coral Reef*
    - *enhancement of regional water quality, with a focus on Biscayne Bay;*
- *Guiding regional, state, and national coral reef authorities, policies, and procedures to ensure consistency and effectiveness of reef management actions.*

Responsibilities for existing staff are as follows:

Our designated **Quality Assurance Officer** (QAO) serves as the QA liaison with other units, data providers, data consumers or other external parties concerning QA matters. The QAO coordinates and participates in the quality evaluation of program data and provides oversight to ensure that our staff perform their QA functions. The QA Officer may delegate some responsibilities to properly trained and qualified staff, when appropriate. The QAO works with other CPR staff to carry out the following responsibilities:

- *Be familiar with and coordinate the maintenance of the quality documents (QA Plan, Guidance Manual and checklists) and quality assurance requirements of the program.*
- *Coordinate and participate in the quality checks of program data and provide oversight to ensure that staff perform their QA functions adequately.*
- *Interact with data generators and providers, data consumers, and external organizations concerning department QA matters*
- *Review submitted QA Plans for conformance with quality criteria*
- *Provide leadership and ensure that staff address deficiencies identified during QA checks and corrective actions are implemented.*
- *Complete and submit the QA Annual Report to the RCP QA Officer*

The program administrator ensures that this quality system is fully operational within our program, designates our Quality Assurance Officer, and provides general oversight. The program administrator evaluates corrective action policies and procedures to be implemented when data does not meet program Data Quality Objectives.

An organizational chart is presented in Figure 1 below**.**

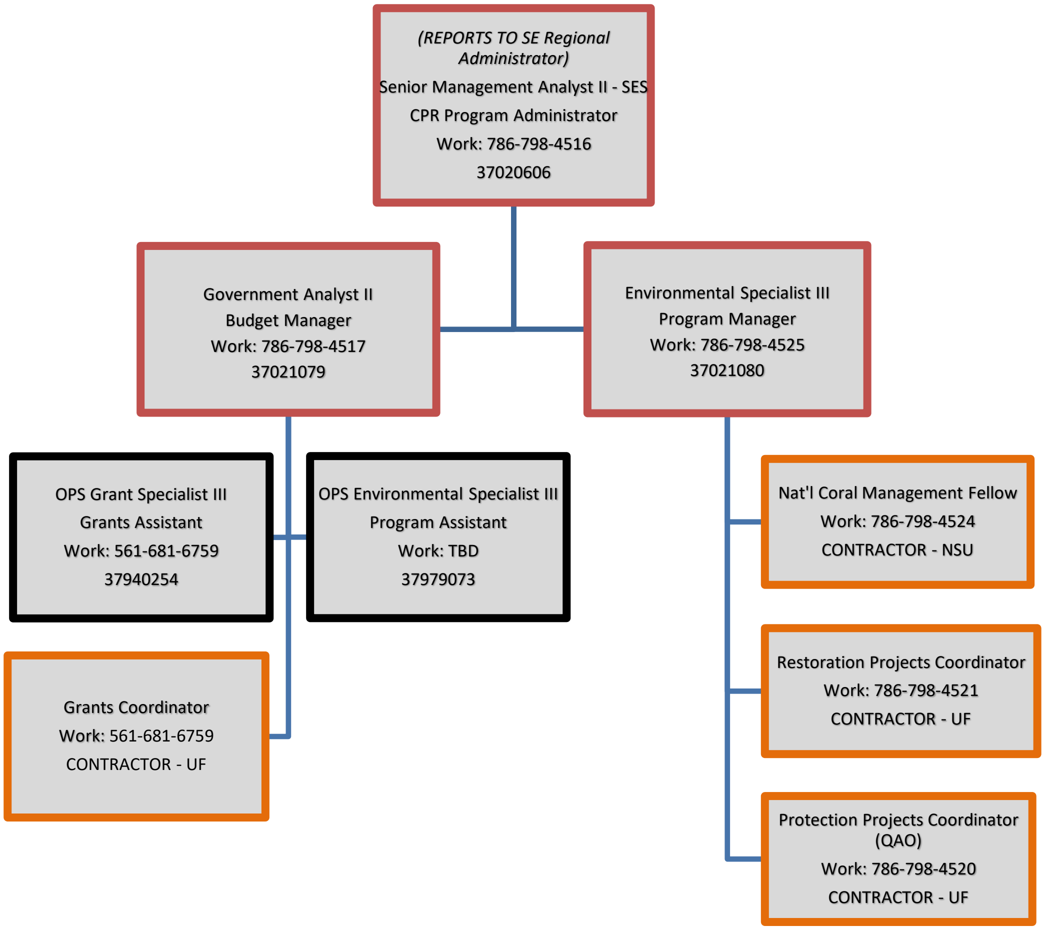

Figure 1: Organizational structure of DEP's Coral Protection and Restoration Program; updated 4/14/25.

Training

All staff are required to participate in the following trainings to ensure that they are properly trained to perform their duties:

- *Review of ethics policy via DEP online training portal*
- *DEAR Intro to Quality Assurance and DEP Quality Plans*
- *Quality Assurance for Contracts/Grants/Purchase Orders*

The QAO is required to participate in the following trainings to ensure that they are properly trained to perform their duties:

- *DEP SOP Training (TREEO Center)*

Additional and optional trainings when applicable are offered on the DEAR training resources page: Training Resources | Florida Department of Environmental Protection. The QAO may also decide to lead an in-house CPR program training on programmatic documentation specifications, which should be accessible and stored for reference in the CPR share drive for all members of the CPR team.

Documentation

There is one main location for electronic documentation related to agreements, the CPR Share drive (\\floridadep\data\BiscayneBay\CPR_Share). The drive is the "working" location for conducting contract management activities. Within the drive, each project will have a dedicated project folder (and sub folders) within the appropriate funding type and year.

The file structure for each purchase order (PO) project folder is as follows:

- Deliverables
    - Deliverable Approval Emails
    - Deliverable Submission Emails
- Invoicing
    - Invoice Submission Emails
- PO Agreement
    - PO Attachments
- Project Management
    - Copies of Subcontract Agreements
    - Photo Release Forms
- QA Plan
- SOW & BCA

Grant projects can be found in the CPR share drive (\\floridadep\data\BiscayneBay\CPR_Share) under their appropriate grant program folder (Bay Grant and FCR3). The secondary storage location for grant projects is the DEP-approved Sharepoint site Coral Protection and Restoration Program - Home (sharepoint.com). On the sharepoint under the grants folder, there is a CPR-Grants_SOP document outlining the grants folder structure and necessary procedures.

The file structure for each Grant project folder is as follows:

- Grant Agreement
    - Amendments & Change Orders
    - Archive
    - Attachments
- Application Docs
- Audits
- FACTS Workbook
- Grantee Correspondence
- GWP-Grant Work Plan
    - Archive
- Internal & Supporting Docs
    - Archive
    - Guidance Documents-provide as needed
- Invoicing
- Permit Information

- Project Deliverables
    - Quarterly Reports
- Project Management
- QA Plan

Archive folders may be added as needed to keep older versions of files stored to keep the most current or final version of documents easily accessible.

The following is a list of document types that should be stored within the project folder:

- *Draft Versions of Agreements, Executed Agreements, Amendments and Change Orders, with Delegation Memo*
- *Agreement Backup Documentation - all of the other documents gathered during writing an agreement that are not part of the actual agreement itself*
- *Routing Memos*
- *Notes*
- *Audits*
- *Deliverables*
- *Disbursement Requests including payment verification-this is a restricted folder that only DEP employees can access (these will be entered into OCULUS by the Disbursement Processing group)*
- *Quarterly Progress Reports*
- *Official correspondence (to include emails)*
- *Informal Correspondence*

DEP requires that all data and deliverables are stored in two locations, to avoid data loss and facilitate data access and transparency. Therefore, all files listed above are also stored electronically within a DEP-approved Sharepoint site (Coral Protection and Restoration Program - Home). To comply with this rule, PO and Grant projects will be uploaded from the share drive (primary location) to the DEP Sharepoint (secondary location) every quarter: (October, January, April, and July of each year). The CPR Program Manager will be responsible for the upload of PO projects every quarter while the Budget Manager will be responsible for the upload of Grants Projects every quarter.

For purchase orders relating to Stony Coral Tissue Loss Disease (SCTLD), final data and deliverables must be DataOne compliant. DataOne is an online portal managed by FWC where data related to this disease is held and publicly available. All other data is held within the share drive. Data that is too large to be held in the share drive (exceeding 1 terabyte) will be sent to the DEP office in Tallahassee to be stored through the mailing of physical hard drive. This data will be publicly available upon a public records request from the capital office through the portal Public Records & Issue Tracking Interface (PRITI).

Contract Management

Our program ensures that the DEP contracts that we administer are properly managed to assure appropriate data quality. Project managers assure that the work is properly planned and executed, relevant to department environmental decisions, and consistent with the department QA Rule and department SOPs.

When a contract/grant or Purchase Order (PO) is initiated (i.e., a department contract "agreement"), the project manager reviews the scope of work documents, including the template attachments. If the scope of work or grant work plan includes field, lab, or statistical work with environmental data, the appropriate QA Requirements (Exhibit D) is attached to the agreement. If a QA Plan is required as part of the agreement, the appropriate template for the QA Plan is provided to the contractor or grantee.

Once the contractor or grantee has submitted a QA Plan, the project manager will review and approve or request further edits, as appropriate. The QA officer will be consulted to finalize the latest version of the plan once the project manager has approved the primary review. If the QA officer has questions or requires further clarification and approval, AEQAS staff will be asked to assist with review.

It is up to the project manager to ensure that the contractor or grantee has an approved QA Plan in place prior to any work being done.

The Budget Manager and Program Assistant are responsible for reviewing and submitting all purchase orders (PO) using the My Florida Marketplace (MFMP). All projects that involve the collection or analysis of environmental data are evaluated. The QA Plan must include the lab conducting the analysis (must be NELAC/TNI or DOH certified if appropriate to the project's data collection) and the analytes to be tested. If the PO information does not clearly indicate which lab will conduct the analyses, or the lab is not listed on the DOH website as certified for the analyte(s), staff should first contact the requestor and ask them to provide clarification.

Non-standard research or monitoring POs: If department programs are contracting with samplers or labs to conduct monitoring or analyses for non-standard procedures or methods not explicitly covered by the DEP SOPs or the lab DOH certification program, AEQAS staff must verify that there are published methods and procedures that will be followed to conduct the work within the PO. The contracted entity should provide a project plan, SOPs, or other documentation describing the QC, calibration and data evaluation elements of the sampling and analysis or other experimental procedures, as required in the Purchase Order Research QA template. If sufficient documentation is not provided, the MFMP QA Approver will ask the requestor to provide the missing information, and the requestor will attach that information to the PO request. AEQAS staff should review the plan or SOP to ensure that expected QC measures will be taken. Research QA requirements are listed in Rule 62-160.600, F.A.C.

Sampling Design Review

Successful implementation of our program relies on valid data, which begins with proper sampling and data collection. Therefore, CPR program staff perform the following activities to ensure that data sampling of funded projects meets project- and program-specific needs:

- *All CPR staff review proposed scopes of work and grant work plans for conformance with quality criteria*
- *The QAO reviews submitted QA plans*
- *The QAO and Program Manager handle requests for use of alternative, new or modified sampling procedures or lab methods*
- *THE QAO and Program Manager answer public or external technical inquiries about data interpretation, approved procedures, suspected QA problems, site-specific issues, etc.*
- *All CPR staff review and evaluate deliverable documents and data for errors and completeness*

Deliverable Review

The project manager is responsible for ensuring that all deliverables are provided to the CPR program in a timely manner, are accurate and comprehensive, and are saved in the appropriate project folder for posterity. Steps for reviewing deliverables is as follows:

- Create a Deliverables folder in your project's main folder on the CPR Share drive (\\floridadep\data\BiscayneBay\CPR_Share).
    - Download all deliverables to that folder.
    - If they have multiple deliverable due dates, make separate folders in the Deliverables folder with the quarter the deliverables are due (i.e. Q1).
- Open the SOW alongside the deliverables that were received.
    - If there are a lot of deliverables to review, make a word doc with the deliverables due for each task to keep track of what was turned in, what needs changes, or what is missing.
- Make all edits to word document deliverables in Track Changes.
- Leave comments as needed throughout the deliverables for the PIs to address.
- Once done reviewing the deliverables:
    - If major edits are needed, email the PI the edited deliverables to be addressed.
    - If minor edits are needed, make the edits in track changes and email them to the PI – ask if they concur with the edits. If they do, accept all edits and email them a clean copy of the final version.
    - If no edits are needed, email the PI that their deliverables have been accepted and to move forward with invoicing for them (if the deliverables are tied to an invoice).
    - Update the Deliverable Tracker for the appropriate fiscal year