

SAP 5
OWM PT Standard Administrative Procedure
for
Handling Collusion, Falsification, and PT Participant Operational Failures

1 Introduction

1.1 Purpose of the Procedure

The purpose of this procedure is to formalize and standardize OWM Laboratory Metrology Program communications to PT program participants when collusion, falsification, or participant failures occur that impact the quality and integrity of the PT program or violate expressly stated policies and procedures.

1.2 Scope

The scope of this procedure is applicable to the OWM Laboratory Metrology Program PT activities related to collusion, falsification of data, and operational failures committed by PT participants. It does NOT cover pass/fail PT analyses.

1.3 Applicable Documentary References

NISTIR 7214, PT Program Quality Manual and NISTIR 7082, PT Program Policies and Plan specify that PT participants shall not share data amongst participants to gain inappropriate measurement results prior to performing calibrations (collusion) and shall not falsify measurement results, uncertainties, or other data that are reported as part of the PT. Policies also specify that participants shall follow the PT plan with respect to care and handling, use of specific procedures, schedules, and confidentiality with exceptions specified. Failures that impact the quality or condition of the PT standard artifacts or resulting PT analysis are covered under this procedure.

1.4 Responsibility and Authority

1.4.1 OWM Laboratory Metrology Program staff are assigned responsibility and authority for documenting and communicated suspected violations of the policies and procedures identified under this scope and for alerting the Program Leader for appropriate action(s).

1.4.2 OWM Laboratory Metrology Program, Program Leader is responsible for investigating, communicating, and resolving suspected violations of this policy and taking appropriate action.

2 Methodology

- 2.1.1 Staff may obtain suspected information (complaints) from the regional PT Coordinators, PT Coordinators, or PT Analysts or through direct observations. The receiving staff member shall complete Form 1: OWM PT Feedback and Inquiry and Complaint Form through the section on OWM Evaluation and Resolution.
- 2.1.2 The Laboratory Metrology Program, Program Leader is responsible for completing the Form 1 as noted in 1.4.2.
- 2.1.3 Action Items arising from the investigation may be handled with SAP 2, Handling PT-Related Action Items and Form 4, OWM PT Action Form.
- 2.1.4 Offending PT participants (and any complainants) will be notified of the final resolution in writing. Affected participants and laboratories have the right to appeal OWM decisions if they provide additional supporting evidence or acknowledgment. Appeals are handled with SAP 2.
 - 2.1.4.1 Resolution may be any one or all of the following depending on the intent or extent of the observations.
 - Warning letter;
 - Requirement for additional training and oversight;
 - One-year or two-year limit on PT participation; or
 - Permanently banning PT participation from the staff member or laboratory (which may be appealed in writing to the Laboratory Metrology Program, Program Leader when providing additional explanations or justifications or apologies).

3 Records

- 3.1 Applicable Form 1 and Form 2 are retained with the PT Records for the specific PT in question and duplicated in the PT Complaint directory. Any completed Form 2 is identified in the Action Item Log as well.
- 3.2 Official communications related to the investigation, communication, and resolution of the Complaint is retained as part of the PT Complaint directory.