

Quality Management Plan

Prepared for the Environmental Protection Agency
Pursuant to ANSI/ASQC E-4-1994

We hereby certify that this document discloses the Quality Management Plan (QMP) designed and utilized by the Virginia Institute of Marine Science of the College of William and Mary. The policies and procedures described herein detail the core of our documented administrative management process and are regularly reviewed, updated and transmitted to institutional personnel.

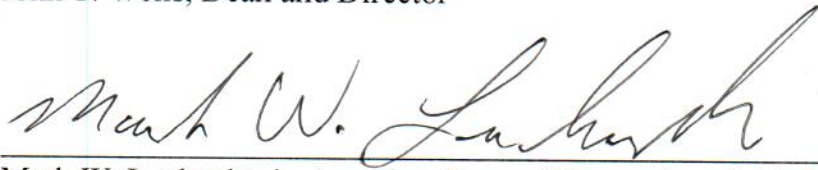
This Management QMP represents our commitment to ensure that all institutional activities are managed in accordance with appropriate regulations and guidelines and support VIMS tri-partite mission of research, education, and advisory service and is designed to meet the challenge of balancing multiple missions, widely assorted funding agencies, and several layers of administrative regulations.

The changes made to the current VIMS QMP, which expires April 1, 2018 include updates to the VIMS Organization Chart and the website links.

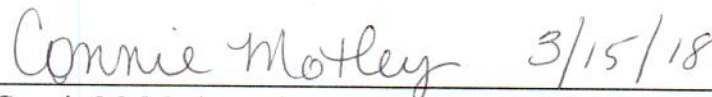
Signed:

 3/15/18

John T. Wells, Dean and Director

 3/15/18

Mark W. Luckenbach, Associate Dean of Research and Advisory Services

 3/15/18

Connie M. Motley, Director of Sponsored Programs

INTRODUCTION

This document has been prepared pursuant to a mandate (ANSI/ASQC E4-1994) from the Environmental Protection Agency (EPA) to provide an overview and description of Quality Management of EPA projects at the Virginia Institute of Marine Science (VIMS) and is submitted as an institutional Quality Management Plan (QMP). The oversight provided by the QMP is in addition to the Quality Assurance Project Plans (QAPP) prepared for each individual research project supported by EPA.

Based on suggestions in EPA QA/R-2 (p. 9) the VIMS Quality Management Plan is organized, to the extent possible, following the Section headings in Chapter 3 of EPA QA/R-2. Further, QA/R-2 (p. 4, Section 1.3) notes that widely differing organizations and programs are supported by EPA funding and not every recommended managerial control is appropriate for every entity. As a university with a wide-ranging and diverse research portfolio coupled with extensive university research compliance requirements, VIMS is able to provide a "structured process" (p.1) together with a "tiered approach" (p. 2) for quality management.

In order to limit the length of this QMP while providing access to in-depth information and full documentation for institutional policies, internet addresses and links rather than extensive quotations are included whenever possible.

Presently, VIMS routinely conducts research and monitoring projects on behalf of the EPA Chesapeake Bay Program. These activities are conducted by VIMS faculty and staff and in accordance with individualized EPA-approved Quality Assurance Project Plans (QAPP). Some examples are:

Submerged Aquatic Vegetation in the Chesapeake Bay (long-term monitoring)
<http://web.vims.edu/bio/sav/index.html>

Shallow Water Monitoring in Chesapeake Bay (long-term monitoring through Virginia DEQ) <http://web2.vims.edu/vecos/Default.aspx>

Wetlands Monitoring (through Virginia DEQ) <http://ccrm.vims.edu/about us/index.html>

The Analytical Services Laboratory (ASC) has posted a Summary of its QA/QC Plan at: <http://web.vims.edu/ascnuts/link2.html>.

VIMS faculty and staff researchers are committed to quality in conducting research and compiling data and maintain the highest standards in data management and archiving. Additionally, EPA projects are supported by QAPP's prepared specifically for individual scopes of work, and each project has a designated Principal Investigator with a staff trained specifically for the particular scope of work. This is in addition to institution-wide training required of all staff members engaged in university research.

MISSION AND QUALITY POLICY OF THE UNIVERSITY:

The Virginia Institute of Marine Science of the College of William and Mary is a public university in the Commonwealth of Virginia. Not only does VIMS serve as the School of Marine Science for the College of William and Mary, for more than sixty (75) years VIMS has been charged by the Commonwealth to serve as the state's entity for research and advisory support on issues affecting Virginia's marine environment. The Institute's **DUTIES AND MISSION** are described in the Virginia Code:

§ 28.2-1100. Virginia Institute of Marine Science continued; duties.

The Virginia Institute of Marine Science shall hereafter be referred to as the Institute. The Institute shall:

- 1. Conduct studies and investigations of the seafood and commercial fishing and sport fishing industries;*
- 2. Consider ways to conserve, develop, and replenish fisheries resources and advise the Marine Resources Commission and other agencies and private groups on these matters;*
- 3. Conduct studies of problems pertaining to the other segments of the maritime economy;*
- 4. Conduct studies of marine pollution in cooperation with the State Water Control Board and the Department of Health and make the data and their recommendations available to the appropriate agencies;*
- 5. Conduct hydrographic and biological studies of the Chesapeake Bay, its tributaries, and all the tidal waters of the Commonwealth and the contiguous waters of the Atlantic Ocean;*
- 6. Engage in research in the marine sciences;*
- 7. Conduct such special studies and investigations concerning these subjects as requested by the Governor; and*
- 8. Engage in research and provide training, technical assistance and advice to the Board on Conservation and Development of Public Beaches on erosion along tidal shorelines, the Soil and Water Conservation Board on matters relating to tidal shoreline erosion, and to other agencies upon request.*

These studies shall include consideration of the seafood and other marine resources, such as the waters, bottoms, shore lines, tidal wetlands, and beaches, and all matters related to marine waters and the means by which marine resources might be conserved, developed and replenished. (Code 1950, 28-248, 28-250, 28-250.1; 1962, c. 406, 28.1-195; 1979, c. 294; 1980, c. 369; 1992, c. 836; 2003; cc. 79, 89.)

Further, pursuant to Virginia Code § 28.2-1101. Use of services of other agencies; solicitation, etc., of funds; taking fish and other marine organisms.

- 1. Use the services of any public or private agency;*
- 2. With the prior written approval of the Governor and subject to other provisions of law, solicit, accept and use funds available from any public or private source; and*
- 3. Cooperate with appropriate state agencies and with similar agencies and institutions in other states and the federal government.*

QUALITY POLICY: The University's mission statement is an integral part of VIMS quality policy which is articulated in Chapter III. F. 3. of the William and Mary Faculty Handbook, <http://www.wm.edu/about/administration/provost/documents/facultyhandbook.pdf>. Extracted below is the statement of policy regarding misconduct in scholarly and research activity (pp. 56- 57). The handbook specifically addresses inquiries, reporting requirements, investigations, and consequences.

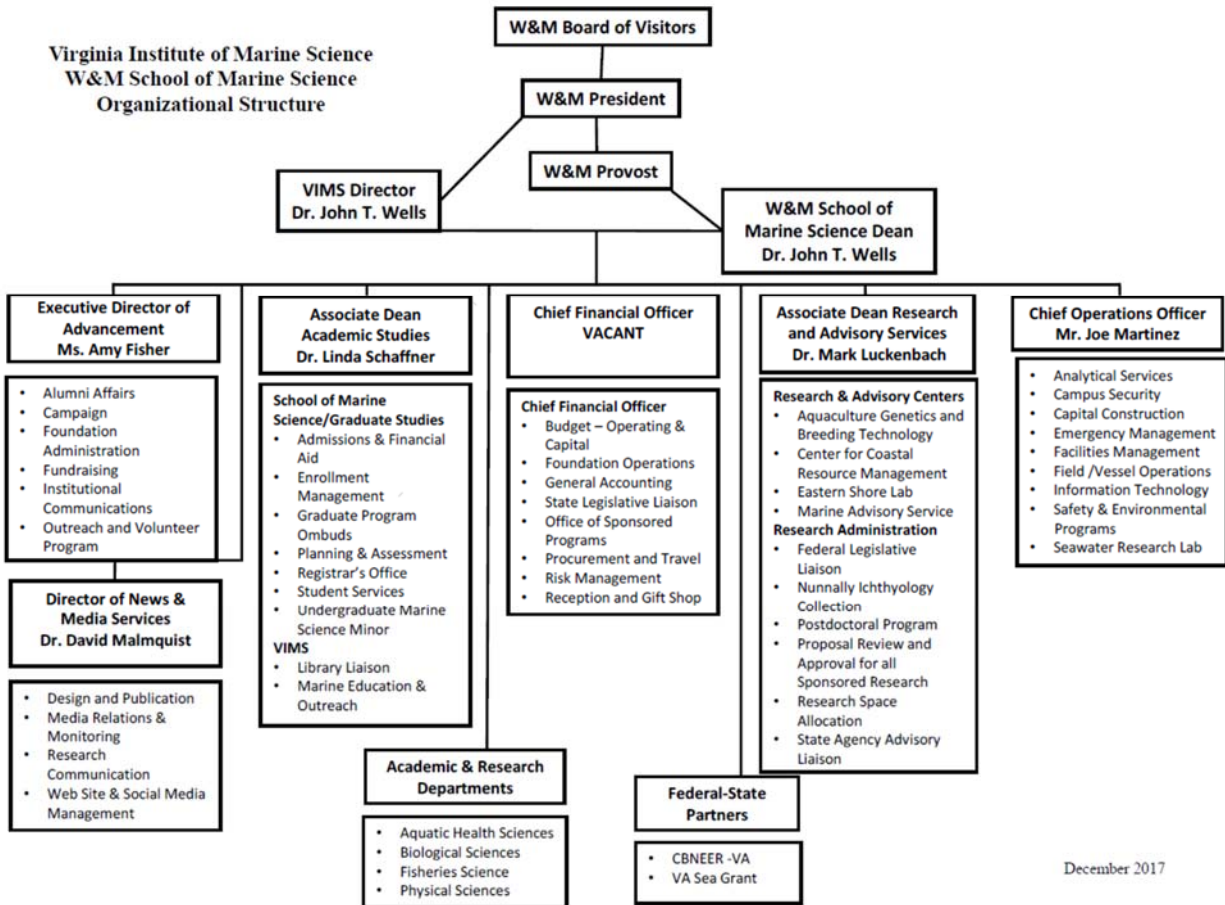
2. Academic Misconduct in Scholarly Activity or Research. *It is the responsibility of faculty and administrators at the College to create and sustain an atmosphere where honesty and integrity are paramount in the conduct and dissemination of research and scholarly and creative activity; this responsibility extends to documentation prepared for the purpose of securing assistance in the pursuit of scholarly activity or research. It is the particular responsibility of individual scholars and researchers to ensure that the quality of published works is maintained: products must be carefully reviewed prior to publication; the accomplishments of others must be recognized and cited; contributors must be given full acknowledgement; co-authorship must be conferred to those, and only those, who have made a significant contribution; and all (co-) authors must be willing and able to defend publicly their contribution to the published results. It is also the responsibility of the College administration and faculty to make undergraduate and graduate students aware 1) of the College policies governing the conduct of scholarly activities and research, and 2) that students as well as faculty members are held to these policies while conducting research.*

a. Definitions of Academic Misconduct. *Although it may be more specifically defined by the discipline and/or in the school or department, academic misconduct is broadly defined to include fraudulent behavior such as "fabrication, falsification, plagiarism, [misappropriation,] or other practices that seriously deviate from those that are commonly accepted within [the particular scholarly community for proposing, conducting; or reporting research [or other scholarly endeavors]. It does not include honest error or honest differences in interpretations or judgments" of results of scholarly activity. Falsification ranges from fabrication to deceptively selective reporting and includes the purposeful omission of conflicting data with the intent to condition or falsify results. Plagiarism and misappropriation involve willfully appropriating the ideas, methods, or written words of another, without acknowledgement and with the intention that they be taken as one's own work, as well as the unauthorized use of privileged information (such as information gained confidentially in peer review). Academic misconduct also includes material failure to comply with legal requirements governing research, including requirements for the protection of researchers, human subjects, or the public, or for ensuring the welfare of laboratory animals.*

MANAGEMENT AND ORGANIZATION

VIMS Organization Chart can also be found at:

http://www.vims.edu/about/leadership/dean/org_structure/Institute_Org_Chart_Dec_2017.pdf



QUALITY SYSTEM COMPONENTS

PROPOSAL SUBMISSION: All VIMS proposals are reviewed prior to submission to ensure compliance with the Institutional Animal Care and Use Committee (IACUC), the Institutional Biosafety Committee (IBC), and the Protection of Human Subjects Committee (PHSC). (Additional detail on these requirements is included in the "Training" section below.)

These additional reviews during proposal submission and throughout the project buttress the VIMS QMP by:

- (1) Fulfilling federal legal requirements;
- (2) Providing an additional tier of research oversight by scientists not directly involved in the work being proposed or conducted.

Proposal submissions are not complete until the investigator has submitted an on-line Routing and Review Form at:

http://www.vims.edu/about/leadership/sponsored_programs/apply/staff_only/index.php.

Completion of the digital Routing and Review Form and submission of protocols, as required, to the appropriate oversight committee(s) provides an additional layer of audit/evaluation for research activities. VIMS webpage on Proposal Submission Requirements at:

http://www.vims.edu/about/leadership/sponsored_programs/apply/index.php.

(See page 7).

Appropriate links to the webpage "EPA Quality System" have been included on the VIMS OSP webpage at:

http://www.vims.edu/about/leadership/sponsored_programs/manage/research/index.php. (See page 9).

Investigators know immediately that if they are preparing a proposal for EPA, there is one additional compliance review to be addressed.

AWARD CONFIRMATION:

If a proposal is recommended for funding, investigators will be required to give a copy of an approved QAPP to the Office of Sponsored Programs before work begins and before any expenditures are authorized.

The formal institutional notification form for an EPA Region 3 award will contain a statement that the project must have and maintain an approved QAPP.

The VIMS Associate Dean of Research and Advisory Services (ADRAS) receives copies of Notification Forms. It is the responsibility of the ADRAS to coordinate with the researchers, periodically reviewing reports and data files as an integral part of the VIMS Quality Management Plan.

Apply for Funding

VIMS Proposal Submission Requirements:

The Office of Sponsored Programs (OSP) and the Associate Dean of Research and Advisory Service (ADRAS) work together to ensure high-quality, complete proposal packages are submitted to funding agencies in a timely manner. This is achieved by a thorough review of each proposal for compliance with sponsor and Institute requirements prior to submission.

Complete and final proposal packages must be electronically received by OSP at least five (5) full business days prior to the sponsor's due date. This will permit OSP administrators and ADRAS to perform a thorough review of the final documents, make any necessary corrections, and allow sufficient time for the submission process. If any proposal documents are not in final form, the proposal is considered late. If the internal deadline is not met and the OSP office does not have sufficient time for a thorough review, the proposal will not be submitted.

Researchers in academic departments (AHS, BS, FS & PS) must have their budgets reviewed by their Departmental Finance Officer before submission to OSP. Centers may have similar requirements for budget review and approval.

In addition to the submission of the completed proposal package required for the Request for Proposals (RFP), please submit the following:

Proposal Routing and Review Form:

[The Routing/Review Form](#) (**VIMS personnel only*) is one of the most important planning documents in the proposal process. Vessels, Diving, the Seawater Lab, and the Safety Office receive notification when an investigator indicates planned use of those services. Please include enough information in the text boxes to ensure allow adequate review by those departments.

The Routing form also provides notification of potential actions that may be required to ensure compliance with regulatory requirements.

- Please note: To prevent unauthorized access, the Route and Review form has been restricted to VIMS staff only. Off-campus access requires Virtual Private Network ([VPN](#)). For assistance with setting up VPN access off-campus, please submit an ITNS Service Request: <https://ldsdweb.vims.edu/landing/lifering.html>

VIMS Proposal Cover Page:

Prior to submission of the completed proposal package, the proposal must be reviewed and endorsed by all of the following (or their designee):

- Principal Investigator (PI) - The PI grants approval for proposal submission by submitting the Proposal Routing and Review Form (above). They will not need to digitally sign the Proposal Cover Page.
- Co-Investigators (Co-PI)
- Department Chair/Center Director
- Katherine Davis Small,
Assistant Director of Sponsored Programs
- Mark Luckenbach,
Associate Dean for Research and Advisory Service (ADRAS)

It is the PI's responsibility to provide proposal materials to Co-PI's and Department Chair(s)/Center Director

(s) in a timely manner for their review.

Submission of the Proposal Routing and Review Form will immediately generate e-mails to Co-PI's and Department Chair(s)/Center Director(s) requesting their approval of the Proposal Cover Page. To access the Cover Page, you must be logged into the VIMS network either on campus or via VPN. For assistance with setting up VPN access off-campus, please submit an ITNS Service Request: <https://ldsdweb.vims.edu/landing/lifering.html>

Research

Research Integrity

- [Integrity in Research and Scholarly Activity](#) from the from College of William & Mary Faculty Handbook
- - [EPA Quality Management](#): EPA requires a Quality Assurance Project Plan for all projects that involve the acquisition of environmental data.
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- [Policy on External Paid Employment](#) (Approved by the W&M Board of Visitors, 2 February 1996)
 - [External Paid Employment Approval Form](#)
- [Policy on Financial Conflict of Interest](#) (Approved by the W&M Board of Visitors, 13 May 1995)
 - Financial Disclosure and Conflict of Interest Form ([MS Word](#))
- Intellectual Property
 - Disclosure Form ([MS Word](#), WP5.1)
 - Background information on Intellectual Property:
 - [Copyright Information](#) (from Yale University Library)
 - [iEdison](#) (information regarding reporting inventions developed under federal funding)

Research Compliance:

VIMS strives to minimize any risk to the environment, human or animal populations that may result from its research and educational endeavors. To that end, we seek to promulgate and disseminate relevant regulations, policies and training opportunities to principal investigators and their staff members and students.

VIMS and the main campus of William and Mary share institutional research review committees for IACUC (Institutional Animal Care and Use Committee), PHSC (Protection of Human Subjects Committee), and IBC (Institutional Biohazard Committee). Radiation Safety on the VIMS campus(es) is the responsibility of the VIMS Office of Safety and Environmental Programs. These organizations are tasked with maintaining University compliance with all laws and regulations requiring institutional review and approval for research and teaching protocols.

IACUC, IBC and PHSC utilize the W&M Protocol and Compliance Management system for the electronic submission, approval, and tracking of research protocols. Login using your myWM username and password to [submit and manage protocols](#).

If you have any questions about the system, please email compliance@wm.edu.

The VIMS Radiation Safety Plan is available from the [Office of Safety and Environmental Programs](#) web page, as is the Request for Radioactive Approval and Use form.

PERSONNEL QUALIFICATION AND TRAINING

HIRING:

VIMS QMP for hiring and personnel procedures are established under state policies as articulated by the Commonwealth's Office of Human Resources. The website for that agency is located at: <http://www.dhrm.state.va.us/>.

The College of William & Mary website describes state and institutional policies and provide electronic copies of mandatory personnel forms. The address is <http://www.wm.edu/offices/hr/forms-topic/index.php>.

Further, the College of William & Mary has a site available providing information about job openings and employment regulations as well as copies of employee and faculty policies and issues. That site is: <http://www.wm.edu/offices/hr/careers/index.php>. All positions are competitive. Job postings are advertised and interviews conducted to ensure identification and selection of the best-qualified applicants for open positions. Candidates must meet educational and experience requirements for the positions advertised, and all individuals selected must undergo a background check. Each employee has an annual performance evaluation.

TRAINING:

VIMS has extensive training requirements and access to a variety of opportunities for training faculty, staff, and students. These include:

SAFETY: <http://www.vims.edu/intranet/safety/programs/index.php>. *Supervisors must ensure that all new or reassigned personnel are instructed in safe methods of performing particular tasks prior to starting and during the early stages of each new job. A general safety briefing will be held in conjunction with the Hazard Communication Standard training for every new person checking in.*

RESEARCH COMPLIANCE: Training modules must be completed by any faculty or staff member working with animal subjects. The modules are on-line and available through the WM Self-Service website <http://my.wm.edu>. These are password protected and not open to the general public. Each Institutional Animal Care and Use Committee (IACUC) and Institutional Biosafety Committee (IBC) protocol is approved for three-years; an annual renewal request is also needed to stay current and allow the IACUC to confirm that research protocols are being followed. Protection of Human Subjects Committee (PHSC) protocols are submitted and reviewed annually. Any significant changes taking place during the year must be reported to the appropriate Committee for additional review. In the event a researcher does not have an approved protocol for a research project, work may not begin until an approved protocol is in place.

A statement of compliance requirements is distributed twice annually to all investigators as a reminder that research data must be collected in a manner consistent with federal mandates. The memo states (in part):

Under Federal Regulations, certain classes of activity require formal review BEFORE they may be undertaken by employees or students of the College. This is true whether or not these regulated activities are funded by external money, whether or not they are performed as part of normal instruction in a classroom, lab, or practicum, whether or not they are performed on the College's grounds, and regardless of whether they are part of a formal research program or simply the result of academic curiosity on the part of a Professor or Student.

These classes of work include:

- 1. work involving living human subjects (including some survey research or questionnaires);*
- 2. work that uses or produces radioactive materials;*
- 3. work that involves the use and care of vertebrate animals; and*
- 4. work that involves recombinant DNA, or infectious agents, or direct or indirect contact with wild-caught animals that may harbor infectious agents, or any human fluid or tissue. It has been determined by W&M that oversight of Select Agents falls under the purview of the Environmental Health and Safety Office. See a complete [list of Select Agents and Toxins](#) (pdf). Questions in regard to Select Agents should be directed to [Sandra Prior](#), Director of EHS*

By law, reviews of work in any of the four categories above must be performed by duly constituted committees appointed by, and reporting to, senior administrators of the College. To enable these reviews, investigators must submit proposals to perform work involving these regulated activities. The proposals must describe the detailed, step-by-step protocols and procedures that will be used in the performance of the work. These protocols must also be updated once each year to permit continuation of the work. Note that this sort of review is required for some survey work that may be done year-after-year in scheduled classes or laboratories.

Detailed descriptions of the compliance committees, along with guidance for investigators, can be found on the College's Compliance website, located within myWM, <https://myv.wm.edu>, under the Self Service tab. We want to emphasize that the law mandates that those individuals who will perform, or intend to perform, a particular activity involving these regulated areas may not judge for themselves whether that activity is exempt from formal review. Therefore, whenever you have any doubt about whether your work might require review, the correct approaches are either to submit that work through the Protocol and Compliance Management electronic submission program, or to contact a Committee Chair to discuss it.

Additional information:

http://www.vims.edu/about/leadership/sponsored_programs/compliance/index.php

CONFLICT OF INTEREST AND ECONOMIC DISCLOSURE: The University, as well as the Commonwealth of Virginia, requires all employees to file annual certifications with respect to potential conflicts of interest both financial and academic. University policy for faculty researcher Conflict of Interest is located in the Faculty Handbook, Section III.E. at

<http://www.wm.edu/about/administration/provost/documents/facultyhandbook.pdf>.

The state policy can be found on the Secretary of the Commonwealth's webpage at: <http://ethics.dls.virginia.gov>. Assurance that there is no financial or academic conflict between the faculty member's research and his/her personal is the portion of the QMP that supports of 2 CFR 200.112 "Conflict of interest" clause.

PROGRAM SPECIFIC TRAINING: Project investigators are responsible for ensuring that staff members receive training on new software, data management, and other research protocols as appropriate to the specific program. Funding is made available for attendance at classes, seminars, and conferences and training plans and protocols may be included in the individual QAPP submitted for each project.

PROCUREMENT OF ITEMS AND SERVICES

To secure good and services competitively and externally for the university, procurement procedures must be conducted in an fair and impartial manner and fully conform to state law and the Commonwealth of Virginia Purchasing Manual for Institutions of Higher Education and their Vendors.

The College's e-procurement system is eVA. The SPCC (Small Purchase Charge Card) program is the preferred method for procuring low dollar goods and services and offers the opportunity to streamline the transaction process.

The College of William and Mary is one of eleven publicly-funded Commonwealth of Virginia colleges and universities that fully conform to the rules governing procurement and the Virginia Association of State Colleges and University Purchasing Professionals (VASCUPP). Additional information can be obtained in the VASCUPP Purchasing Manual for Institutions of Higher Education and their Vendors. This Manual is a comprehensive reference source specific to the purchasing departments of fully decentralized institutions of higher education under the Commonwealth's pilot decentralization program.

(<https://vascupp.org/hem.pdf>)

On-line reference and access to additional procurement information is provided on the VIMS website at: <http://www.vims.edu/admin/accounting.html>.

Internal Services for analytical processes are handled by the VIMS Analytical Service Center (ASC). Their statement of policy is published at <http://web.vims.edu/ascnuts/aschome.html>.

The Analytical Service Center has spent more than a decade researching, developing, and refining methodologies for analyses in a wide spectrum of environmental matrices. The quality of this data is the result of thorough statistical controls, documentation, and training. ASC instrumentation is of the current generation - computer control/acquisition, background correction; and all optimized for saline matrix. Extensive field experience has created a suite of well-honed sampling and processing procedures, and specialized equipment. The capabilities of the lab exist to assist you.

DOCUMENTS AND RECORDS

Data retention and record management is the responsibility of each individual investigator in collaboration with the EPA program manager and must be planned, documented and submitted with the QAPP for each project.

At the end of a project period, each principal investigator certifies submission of a final report and/or all other data and/or deliverables to the funding agency, in a format consistent with agency requirements. Confirmation of submission and agency acceptance of reports must occur prior to VIMS official project closeout.

Copies of final reports are provided to the VIMS William J. Hargis Library. Many of those reports and files may be accessed at:

http://www.vims.edu/library/vims_publications/vims_reports/index.php.

Project data is maintained in individual laboratories, copied to VIMS Central ITNS facility for back-up, and additionally transferred and backed up at a 3rd, remote location.

For those interested in accessing VIMS data, the institutional website has a link to databases that are available to the public and other organizations.

As appropriate and possible, investigators are expected to submit publications derived from project activities to professional journals and at conferences and meetings for peer review of research activities and conclusions.

COMPUTER HARDWARE AND SOFTWARE

Hardware and software needs for each project are identified in individual QAPP's. As noted above, staff members are hired and trained to ensure that programs are staffed to fulfill the goals of data collection and management of the project. Additionally VIMS has an Information Technology and Networking Services (ITNS) that serves the research community in selection, purchase and maintenance of technology resources. The mission statement of that group articulates its role and responsibility in VIMS data management:

ITNS Mission Statement

To facilitate the missions of VIMS (education, research and advisory services) and to enhance the productivity of the VIMS community (faculty, staff and students).

- *Explore the information technology resource requirements of the VIMS community*
- *Plan and develop a flexible and scalable information technology infrastructure that can deliver those resources to the VIMS community*
- *Identify and promote a set of cost effective and supportable information technology services that can be reliably delivered to the VIMS community*
- *Develop and seek support for policies that will assure security, stability and supportability of IT resources for the VIMS community*

Support Mission for ITNS

ITNS is responsible for the overall stability and management of the VIMS network. Devices (i.e. servers, computers, printers, and network equipment) that are attached to the network must be configured correctly to ensure the stability and security of the network. ITNS will assist the VIMS community in the selection and implementation of equipment and software that will function in the VIMS network environment. ITNS will assist the VIMS community by fixing problems that occur within the VIMS network environment in a timely manner. ITNS will recommend the acquisition of equipment and software that will perform well and minimize the on-going support costs.

General Principles

Access to computer systems and networks owned or operated by the Virginia Institute of Marine Science imposes certain responsibilities and obligations and is granted subject to Institute policies, and local, state, and federal laws. Acceptable use is always ethical, reflects academic honesty, and shows restraint in the consumption of shared resources. It demonstrates respect for intellectual property, ownership of information, system security mechanisms, and individuals' rights to privacy and to freedom from intimidation and harassment.

Guidelines

In making acceptable use of resources you must:

- *use resources only for authorized purposes.*
- *protect your user-id and system from unauthorized use. You are responsible for all activities on your user-id or that originate from your system.*
- *access only information that is your own, that is publicly available, or to which you have been given authorized access.*
- *use only legal versions of copyrighted software in compliance with vendor license requirements.*
- *be considerate in your use of shared resources. Refrain from monopolizing*

systems, overloading networks, degrading services, or wasting computertime, connect time, disk space, printer paper, manuals, or other resources.

In making acceptable use of resources you must NOT:

- *use another person's system, user-id, password, files, or data without permission.*
- *use computer programs to decode passwords or access control information.*
- *attempt to circumvent or subvert security measures.*
- *engage in any activity that might be harmful to systems or to any information stored thereon, such as creating or propagating viruses, disrupting services, or damaging files.*
- *use Institute systems for commercial or partisan political purposes, such as using electronic mail to circulate advertising/or products or for political candidates.*
- *make or use illegal copies of copyrighted software, store such copies on Institute systems, or transmit them over Institute networks.*
- *use mail or messaging services to harass or intimidate another person, for example, by broadcasting unsolicited messages, by sending unwanted mail, or by using someone else's name or user-id.*
- *waste computing resources, for example, by intentionally placing a program in an endless loop, printing excessive amounts of paper, or sending chain letters.*
- *access, download., print, store, or post sexually explicit material, per Section 2.1-800 et seq. of the Code of Virginia.*
- *use the Institute's systems or networks for personal gain; for example, by selling access to your user-id or to Institute systems or networks, or by performing work for profit with Institute resources in a manner not authorized by the Institute.*
- *engage in any other activity that does not comply with the General Principles presented above.*

Enforcement

The Institute considers any violation of acceptable use principles or guidelines to be a serious offense and reserves the right to copy and examine any files or information resident on Institute systems allegedly related to unacceptable use, and to protect its network from systems and events that threaten or degrade operations. Violators are subject to disciplinary action as prescribed in the honor codes and the student and employee handbooks. Offenders also may be prosecuted under laws including (but not limited to) the Communications Act of 1934 (amended) the Privacy Protection Act of 1974, the Computer Fraud and Abuse Act of 1986, The Computer Virus Eradication Act of 1989, Interstate Transportation a/Stolen Property, The Virginia Computer Crimes Act, and the Electronic Communications Privacy Act. Access to the text of these laws is available through the Swem Library Reference Department.

Information Disclaimer

Individuals using computer systems owned by VIMS do so subject to applicable laws and Institute policies. VIMS disclaims any responsibility and/or warranties for information and materials residing on non-Institute systems or available over publicly accessible networks. Such materials do not necessarily reflect the attitudes, opinions, or values of the Commonwealth of Virginia, The Virginia Institute of Marine Science, its faculty, staff, or students.

PLANNING

Data operations for each project supported by EPA will be defined and described in the specific proposal and QAPP submitted by the investigator. The QAPP will be reviewed and approved at the Institutional level by the Associate Dean of Research and Advisory Services (ADRAS). Institutional support will be provided by VIMS ITNS. (See above.)

In addition, the Analytical Service Center will continue to serve as an important component for testing and data validation for projects supported by EPA Region 3. The ASC's Summary of QA/QC is located at: <http://www.vims.edu/admin/asc/> and copies of all laboratory SOP's are on file in the VIMS Library.

IMPLEMENTATION OF WORK PROCESSES

If a proposal is recommended for funding, investigators are required to provide an approved QAPP to the Office of Sponsored Programs before work begins and expenditures are authorized. The formal institutional notification form for an EPA award contains a statement that the project must have an approved QAPP and that the Associate Dean of Research and Advisory Services (ADRAS) must review each project annually for data and management compliance with the approved plan.

The ADRAS receives copies of Notification Forms. It will be the responsibility of the ADRAS so coordinate with the researchers and review their reports and data files at least annually as an integral part of the VIMS Quality Management Plan. The following page is a copy of a prototype notification form with this announcement.

ASSESSMENT AND RESPONSE

Environmental audits are performed for Region 3 Environmental Protection Agency awards by EPA staff members who come to the Institute and review the data collected and managed by Principal Investigators. Copies of all audits will be maintained by the Office of the Associate Dean of Research and Advisory Services.

The Associate Dean of Research and Advisory Services (ADRAS) will meet with principal investigators heading EPA Region 3 projects at least annually to review their data and data management protocols. After review, the ADRAS will document any concerns in writing and present them to the principal investigator. The investigator will respond with a plan to address any issues or shortfalls in the program's data management.

The ADRAS will also be responsible for addressing with the principal investigator any findings that result from an EPA Assessment/Audit. He or she will meet with the principal investigator and EPA representatives to determine and document the procedures outlined for correction of any findings and will track the completion of the corrective action as well as coordinate the preparation of a final response to the EPA.

QUALITY IMPROVEMENT

It is the responsibility of the Associate Dean of Research and Advisory Services (ADRAS) or designee to identify, plan, implement, and evaluate the effectiveness of VIMS quality improvement activities. Based on EPA mandates from "EPA Requirements for Quality Management Plans" (EPA QA/R-2), the ADRAS will be responsible for:

Ensuring that conditions adverse to quality are:

- *prevented,*
- *identified promptly including a determination of the nature and extent of the problem,*
- *corrected as soon as practical, including implementing appropriate corrective actions and actions to prevent reoccurrence,*
- *documenting all corrective actions, and*
- *tracking such actions to closure;*
- *encouraging staff at all levels to establish communications between customers and suppliers, identify process improvement opportunities, and identify and offer solutions to problems.*