DATE: April 13, 1999
REPLY TO ATTN OF: CAO:QA:MAI:99-0596:UFC 2300.00
SUBJECT: CAO Quality Assurance Program Document (QAPD) Interpretation Number 99-01

CAO has recently observed instances of misinterpretation of the QAPD requirements in the area of preparation and maintenance of the QAPD procedures matrix and in the area of CAO review and approval of revisions to Graded Approach procedures. Attached is QAPD Interpretation 99-01, which should assist in clarifying the QAPD requirements.

If you have any questions, please contact me at (505) 234-7484.

Marc A. Italiano
Quality Assurance Manager

Attachment
CAO QAPD INTERPRETATION NUMBER 99-01

QAPD PROCEDURES MATRIX REQUIREMENT
CAO QAPD, Revision 2, paragraph 1.1.2.2 A. Procedures Matrix: states that: “Each organization that directly supports CAO activities shall prepare and maintain a procedures matrix that identifies applicable documents of each organization or project that implement each applicable requirement of this QAPD. The matrix shall specifically reference the applicable portion of the procedure or document. The matrix shall be updated as implementation procedures are revised”

INTERPRETATION
While the QAPD no longer requires organizations to submit their QAPD Procedures Matrix for formal CAO review prior to issuance, the matrix is subject to informal CAO review at any time, and especially in the support of audit preparations. However, the QAPD requires the matrix to be updated as implementation procedures are revised – not simply at the time of, or in preparation for, upcoming audits. Additionally, the level of detail must be such that each requirement in the QAPD can be correlated to a specific portion of an implementing procedure or document.

IMPLEMENTATION
Organizations’ procedure(s) and/or plans must require that the matrix shall be maintained and updated as implementing procedures are revised. It must also be clear that it is required to correlate each requirement in the QAPD to a specific portion of an implementing procedure or document.

GRADING PROCEDURES REQUIREMENT
CAO QAPD, Revision 2, paragraph 1.1.2.4 D. Grading Items and Activities and Applying Management Controls: states in part that: “Program participant procedures which establish and implement a graded approach...shall be submitted to the CAO QA Manager for approval for use in CAO programs.” Paragraph 1.4.2.3, Document Changes, states in part that: "Changes to documents...shall be reviewed and approved by the same organizations that performed the original review and approval."

INTERPRETATION
Organizations are to submit their respective grading procedures and subsequent revisions to the CAO QA Manager for review and approval prior to implementation.

IMPLEMENTATION
Organizations’ procedure(s) and/or plans must require that grading procedures and their subsequent revisions shall be submitted to the CAO QA Manager for review and approval prior to implementation.

NOTE: Failure to maintain a current matrix and/or to submit revisions to grading procedures can result in the issuance of CAO Corrective Action Reports (CARs) upon discovery of the deficiency.