

Summary of Advocacy Committee Meeting
August 11, 2017

1. Call to order

Steve Arms called the meeting to order at 9:00 EDT, August 11, 2017, in Washington, D.C. Attendance is recorded in Attachment 1.

2. Approval of minutes

Minutes of the July 7, 2017 meeting were presented for approval. Zonetta English moved approval and Robin Cook seconded. All members present voted in favor.

3. PowerPoint Presentation

Steve Arms presented the powerpoint of the Advocacy Committee's role and membership along with accomplishments for the past six months.

4. Highlights of the Washington, D.C. Meeting: Following the powerpoint presentation, Steve asked members to mention highlights of the meeting that may need follow up by the Advocacy Committee. Highlights included:

- **MUR session.** The Method Update Rule is now final and the 600 series methods are effective. We should work with stakeholders to clearly articulate implementation issues and discuss with EPA. If possible, ask EPA to issue a clarification. EPA could use the ATP (alternate test procedure) process to clarify the methods. Members agreed that while this was a methods issue, it was a TNI issue as well, because it affects laboratory assessments. Marlene, Stacie, and Zonetta agreed to help articulate this issue and Lara will assist with coordination with EPA. It was agreed that TNI should develop a webinar on implementation of the MUR. We should ask EPA and the Chemistry Committee to review. Marlene said she could provide the webinar. Stacie said her facility could provide some real-time data to use. Jerry will send out an email to let people know that the MUR is final and that TNI will be providing more information and training in the next 30-60 days. The webinar will focus on implementation.
- **LASEC.** Lessons learned about standards development and approval process.
- **ELAB.** The ELAB sponsored meeting on WET PTs and collaboration with EPA went well. Advocacy may want to write a letter to EPA saying that and also that we want to collaborate on the MUR effort.

Sharon will continue on the Drinking Water Certification training issue. Should Advocacy be a part of this? We should check with South Carolina to see how they prepare their staff for the DW cert class. We need to clarify the perception that the NELAP AC "gave up" on trying to get EPA to provide additional assessor training courses. We may be able to get support from APHL if needed for EPA to approve duplicate or comparable training. Advocacy will keep a finger on the pulse.

- **Mentor Session.** Ilona is consolidating the questions, answers, and clarifications relating to 2016 implementation for the California program. CA will need this in early 2018.
- **Quality Systems.** The Quality Systems Committee has completed the Small Lab Handbook and will be advertising it soon. They are working on the Quality Manual Template next. They will need to insert guidance from the Chemistry Committee on LOD/LOQ; however the Chemistry Committee's priority is finishing the standard.
- **Method development and approval.** Many people commented that the methods development and approval process is out of date. The workshop generated ideas for improving the process. We need to consider sending a letter to EPA and/or the FEM with suggestions. Jerry will work with Sharon on the drafting letter and decide where to send it. We should discuss this at the next Advocacy meeting.
- **California program.** In her presentation on the status of the CA program, Christine Sotelo asked for help from TNI in three areas: qualifications for 3rd party assessors, changes to the standard (number of PTs and technical manager qualifications, and clarifications needed for small labs to implement the standards. Quality Systems agreed to take a look at technical manager qualifications and implementation guidance may be helpful to the small labs.
Christine also said that a case study showing improvement in data quality as a result of implementing the TNI standards would be helpful. Questions and comments about this idea included:
 - What are the parameters we should look at?
 - This type of study isn't really TNI's area of expertise. Should we try to find an academic institution to conduct a study?
 - We should be careful what data is collected.
 - Would PT failures be a good indicator?
 - Some improvements are not easily quantified, e.g. flagged data. Increase in corrective actions may appear negative, but actually may not be.
 - Data users might want to weigh in.
 - Minnesota is trying to do this as well. Maybe could work with other states.
 - A review of top deficiencies before and after implementation might be helpful.

Christine indicated that she would pursue discussions with the state's contractor to see if they could offer some help. All agreed that TNI should stay involved.

4. Newsletter planning

The editor of TNI's next newsletter is Sharon Mertens. Articles and authors suggested for the newsletter included:

Article & Description	Authors	Email for Authors
Wrap up of summer meeting	Jerry Parr	Jerry.parr@nelac-institute.org
Article about Albuquerque meeting	Jerry Parr	Jerry.parr@nelac-institute.org
New 17025/17011	Marlene Moore	mmoore@advancedsys.com
View from the top	Alfredo Sotomayor	asotomayor@mmsd.com
Summary of PT database	Maria Friedman	maria.friedman@waterboards.ca.gov
NEFAP comments on standard	Justin Brown/Ken	jbrown@emt.com ken.jackson@nelac-institute.org
Member spotlight on Nilda Cox (Sharon M. for next issue)	Stephanie Drier	stephanie.drier@state.mn.us
MUR update	Jerry Parr	jerry.parr@nelac-institute.org
California update	Katelyn McCarthy	katelyn.mccarthy@waterboards.ca.gov
Climate at EPA (funny?)	William Lipps	
Call for abstracts NEMC	Jerry/Lara	jerry.parr@nelac-institute.org
Status of 2016 standard	Ken Jackson	ken.jackson@nelac-institute.org
Gardening (integrated pest management?)	Jerry	Jerry.parr@nelac-institute.org
Where to go in Northern New Mexico	Who?	
Recipe?	Who?	

Articles will be due October 15 for publication around November 1. Editor for the winter edition will be Lynn Bradley.

5. Comments on draft rule for the California program

California ELAP has proposed draft preliminary rules for their program. Comments are due on September 7, 2017. Jerry has completed an initial proposed comment document from TNI (see Attachment 2). Comments are in the text box and suggested new language is shown in blue. Jerry walked members through the existing comments. A summary from the August 3, 2017, Advocacy call is pasted below along with comments from this meeting.

Comments and suggestions on the first section (64801.Definitions) included:

- Members concurred with Jerry's comment about citing the full title of the 2016 standard to avoid confusion.
- Should we comment on the term "California analyte"? Is this term necessary?
- Should the term "deviation" be "finding" instead to be consistent with other terminology in this field?
- Members concurred with Jerry's proposed comment to change "sophisticated instrument" to "sophisticated technology", selected from TNI technology list.

- Members concurred with Jerry's proposed comment on the definition of TNI.

Comments and suggestions on Article 2 Accreditation Requirements included:

- Members agreed with Jerry's comment that the period of accreditation should be clarified. Did CA mean 12 month or 24 months? It appears assessment frequency and accreditation are being confused.
- In b (2) of the same section, it would be helpful to require the applicant to clearly note any changes being requested in the renewal application.
- In several places, it is not clear that PT results should be submitted to the state directly from the PT provider. This should be clarified.
- In 5(f), add the word "renewal" before "application".
- Under Quality Systems, d (1) (A) is confusing and needs to be restated. Use of "shall include" and "at least shall include" confusing. Add that Quality Manual can include already existing documents by reference. Also change the word "certification" to "accreditation"
- Members agreed with Jerry's comment to eliminate the requirement for quarterly reports from the laboratories.
- Under Fields of Accreditation, members concurred with Jerry's comment that this section needs more detailed and perhaps a process outlined.
- The concept of "unit of accreditation" versus field of accreditation is confusing and should be explained more clearly. As it is, "unit of accreditation" seems to imply field of accreditation as TNI accreditation bodies use it.
- Under Proficiency Testing, we should reiterate that PT results need to be submitted by the provider. Otherwise, labs could submit only passed PTs.
- Members agreed with Jerry's comment concerning determination of root cause. The word "determine" should be changed to "investigate" since root cause cannot always be determined.
- When no commercial PT is available, rules should require that the analyst perfume a demonstration of capability as an alternative.
- Suggest change language to language saying that if 'onsite not performed within 6 months of **initial** application....'
- The section on auxiliary labs is written differently from mobile labs. Draft rules should clarify: satellite labs, and auxiliary labs. Delete "for the purpose of additional capacity...." And "only report to main lab..." Make language consistent with the section on mobile labs.
- Under Laboratory Personnel, make the conforming change to "sophisticated technology" under technical manager responsibilities.
- Delete sections (f) and (g) under Notification, Reporting and Records Retention.

6. Next meeting

The next teleconference meeting of the Advocacy Committee will be on Thursday, August 31, 2017, at 12 Noon Central time. This date change will allow time for final review of the comments for the California draft rule.

Attachment 1

	Name	Stakeholder Group	Present/Absent
1.	Lara Phelps	EPA (Other)	Present
2.	Steve Arms	Other	Present
3.	Lynn Bradley	Other	Present
4.	Stephanie Drier	Lab	Absent
5.	Martina McGarvey	AB	Present
6.	Stacie Metzler	Lab	Present
7.	Zonetta English	Lab	Present
8.	Marlene Moore	Other and NEFAP	Present
9.	Elizabeth Turner	Small Lab Advocate	Absent
10.	Janice Willey	Federal	Present
11.	Trinity O'Neal	Lab	Present
12.	Robin Cook	Lab	Present
13.	Sharon Mertens	Lab	Absent
Associate Members			
	Kirstin Daigle	Lab	Absent
	Judy Morgan	Lab	Absent
	Aurora Shields	Lab	Absent
	JoAnn Boyd	Lab and FAC	Absent
	Judy Duncan	Other	Absent
	Kenneth Jackson	Other	Absent
	Keith Chapman	Other	Absent
	Teresa Coins	TNI Ambassador	Absent
	Andrea Teal	TNI Ambassador	Present
	Devon Morgan	TNI Ambassador	Absent
	Bob Pullano	TNI Ambassador	Absent
	Lee Wolf	TNI Ambassador	Absent
	Paul Junio	TNI Ambassador	Present
	Staff		
	Jerry Parr	TNI ED	Present
	Carol Batterton	TNI PA	Present