

Laboratory Accreditation System Executive Committee

Meeting Minutes

Monday, February 28, 2011, 12:00 EDT

1. Welcome guest: Judy Duncan. Committee members present are listed in Attachment A.
2. Minutes from February 2, 2011 meeting were reviewed. Additions to the minutes included the recommendation to do some trend analysis on the SIRs as more are approved. Mitzi's contact information needs to be corrected. Roger motioned to approve the minutes with the corrections. The motion was seconded by Kristin and unanimously approved. June will make the corrections and forward the minutes for posting.
3. AB Task Force Presentation Review and Discussion with Judy Duncan

Comments were provided via email and during discussion:

- Could an assessment from another AB using the TNI standard be accepted? Could they accept the actual accreditation? Is there a way for current ABs to accept the accreditation from the third party?
- Mitzi's and Ann Marie commented that MOUs work well.
- Are there things that TNI could do to make it easier for states to use third party assessors? Marlene Moore would be a good contact to talk to about third party assessors.
- TNI could act as a clearing house for third party assessors. The report could be available to states that are done by a third party assessor.
- In DOE, they review audits and evaluate corrective action. The third party performs the audit. The lab has access to the report, so the lab could be responsible for forwarding the report. Ann Marie would be a little uncomfortable receiving it from a lab – they might just send the best or it could be altered.
- Illinois is the only one that has restricted their activities.
- Could DOD/DOE become an AB?
- Dan – Want to recognize an accreditation from a body that is using the TNI standard, but not an AB. He is concerned about this approach. It opens questions about why you need to be an AB.
- Kristin – slippery slope. They have not had budget issues that others have.
- Ann Marie – they will take an assessment report from a home state, but not from a third party AB. They want the state to take the responsibility for the assessment report. They are interested in TNI assessing third party assessors – this would help them accept some additional audits. States are responsible for the labs that are in their states.
- Oklahoma doesn't accept accreditation from another state, but they are willing to review audits from other states.
- June: Leave the notion of states working with third party accreditors up to the states and TNI shouldn't be involved. The labs are paying for the audits and the accreditation and the states should take care of it.
- A concern was expressed that some of what we are talking about could put the states out of the accreditation business.
- Need to evaluate whether changes to the standard would be required.
- Roger would like more time to be spent looking at surveillance audits. He would also like DOD or DOE audits to be equivalent and have the states use these audits instead of re-auditing.

- Surveillance audits could get some common based criteria. This would help alleviate mutual recognition issues.
- Training was another issue the task force addressed. More training is needed. Training ABs on how to manage their program. Might help with consistency too. Best management practices. How to follow-up on corrective action. Training new staff – as retirement starts happening.
- The way the program has to be run as far as fee collection affects how the state programs can run.
- Formal discussion need to happen between states to see what is working for them. Maybe material can be shared. This is being done, but maybe a more formal process would be good.

Provide additional comments to Judy Duncan by March 4th.

4. New business –

- Draft a policy for how to define and realize a “rolling implementation date” because there are some States that will not be able to adopt the TNI standards on July 1, 2011. From Lynn Bradley: *This policy needs to address general concepts for reciprocity, as well as how laboratories may juggle two primary ABs with different standards in use, plus as many of the finer details as can be foreseen and reasonably addressed in the time available for development of the policy.*

The AC asks that the LAS (perhaps with assistance from the LAB Expert Committee, if you choose) draft this policy on an expedited schedule, so that it will be ready in time for the previously-agreed-upon July 1 implementation date. The policy is needed both to assist the ABs with implementation and to assure the laboratories that business-as-usual will continue, and how it will continue, despite the individual ABs' state political situations. It will be a great benefit to the ABs in how to handle the details of reciprocity between different standards in use, in a fashion that is consistent among all the ABs.

- These are additional excerpts from Lynn via email. Lynn is available to assist. Excerpts from the Evaluators meeting follow:

ABs agreed that reciprocal recognition will continue regardless of which standard is in use by any individual AB. It was not until the week before conference that one of the ABs was handed a decision to delay implementation, so this issue has come up quickly since the fall gubernatorial elections.

This policy needs to address general concepts for reciprocity, as well as how laboratories may juggle two primary ABs with different standards in use, plus as many of the finer details as can be foreseen and reasonably addressed in the time available for development of the policy. On the February 9 NELAP Evaluators call, the evaluators identified many of the substantive details that will need to be addressed -- text from the minutes of that call is also excerpted and pasted, below. The AC asks that the LAS (perhaps with assistance from the LAB Expert Committee, if you choose) draft this policy on an expedited schedule, so that it will be ready in time for the previously-agreed-upon July 1 implementation date. The policy is needed both to assist the ABs with implementation and to assure the laboratories that business-as-usual will continue,

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And lastly, the 2009 TNI PT standard requires 2 PTs per "calendar year", but with a July 1 implementation date for the other modules of V2, this makes completing two PTs under the still-to-be-adopted new FoPT tables a bit tricky. The AC would like LAS to include in the policy a way of dealing with these two different aspects.

Excerpt from minutes of 2/9/11 Evaluator teleconference: As a number of ABs will not be able to implement the 2009 TNI standards by July 1, 2011 the implementation will occur on a rolling schedule. This reality prompted a discussion on the benefits of a NELAP Accreditation Council policy to address such questions as:

- 1). *Since Volume 2 of the 2009 TNI standards are not part of State statutes, will the evaluations of ABs be against this portion of the standard and the Evaluation SOP using the more current completeness checklist, compliance checklist and NELAP policies despite the lack of implementation of the new standards by the AB/s?*
- 2). *If the AB's quality system documents reference the 2003 NELAC standards, how will the ETs [evaluation teams] assure that these will be updated when the AB does adopt/implement the 2003 TNI standards?*
- 3). *What approach will allow the evaluations to be within the recommended timelines given the delay in implementation of the new standards by the ABs.*
- 4). *Should the policy take into account that in most cases the new standards both for labs and for ABs are very similar and where different in general the new standards afford more flexibility.*
- 5). *How will uniformity of evaluations be assured given some ABs may be much further along in implementation of the new standards than others?*
- 6). *How will the ETs observe lab assessment/s by the AB against the new standards if these standards are not approved by the AB's regulations?*

- The LAS EC has also been asked to work on the following:

There is one item, requested by an AC member, that we hope the LAS EC or perhaps the LAB expert committee can help us address. We need a procedure for how an AB can add or change technologies in its Fields of Accreditation, between evaluations. Seems strange that it hasn't come up before now, but we need to address it going forward. Hopefully, this will be relatively straightforward to develop and implement, and we appreciate your assistance.

5. The next meeting is Monday, March 28 at noon.

Attachment A
PARTICIPANTS
TNI LABORATORY ACCREDITATION COMMITTEE

Member	Affiliation	Contact Information
Ann Marie Allen - present	Massachusetts, Non-nelap AB	T: 978-682-5237 x333 E: ann.marie.allen@state.ma.us
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Jo Ann Boyd – absent	Southwest Research Institute, Lab	T: 210-522-2169 E: iboyd@swri.org
Carol Barrick - absent	Mosaic, LLC, Lab	T: 813-361-6911 E: cabarrick@msn.com
Kristin Brown- present	Utah Bureau of Lab Improvement, AB	T: 801-965-2540 E: kristinbrown@utah.gov
George Detsis - present	Department of Energy, Government	T: 301-903-1488 E: george.detsis@eh.doe.gov
Dan Dickinson - present	New York DOH, AB	T: 518 485-5570 E: dmd15@health.state.ny.us
June Flowers – Chairperson present	Flowers Chemical Laboratories, Inc., Lab	T: 407 339-5984 x212 E: june@flowerslabs.com
Terri Grimes - present	Pinellas County Utilities, Municipal Lab	T: 727-5822302 E: tgrimes@co.pinellas.fl.us
Marvelyn Humphrey – present	USEPA Region 6, EPA	T: 281-983-2140 E: humphrey.marvelyn@epa.gov
Roger Kenton - present	Eastman Chemical Company, Lab	T: 903-237-6882 E: rogerk@eastman.com
Judy Morgan - absent	Environmental Science Corporation, Lab	T: 615-773-9657 E: jmorgan@envsci.com
Mitzi Miller - absent	Dade Moeller & Associates	T: 509.531.0255 E: mitzi.miller@moellerinc.com
Julia Sudds – present	E.S. Babcock & Sons, Inc. Lab	T: 951.653.3351 E: jsudds@babcocklabs.com
Ilona Taunton – present	TNI Assistant Executive Director	T: 828-894-3019/828-712-9242 E: tauntoni@msn.com
Carol Batterton – absent	TNI Program Administrator	T: 830-990-1029 E: carbat@beecreek.net

Attachment B

Action Items – LASC