

Summary of the NELAP Accreditation Council Meeting
February 5, 2018 **1:30 pm Eastern**

1. Introductions

The NELAP Accreditation Council (AC) met at 1:30 pm on Monday, February 5, 2018. The minutes of December 4, 2017, were approved and the minutes of January 24, 2018, were approved with several minor edits. Those present are listed in Attachment 1. In the Chair's absence, Vice Chair Paul Bergeron led the meeting.

2. NH Recommendation for Renewal

Cathy moved and Lynn seconded that the recommendation of the Evaluation Team, to renew the recognition of New Hampshire as a NELAP Accreditation Body, be approved. All ten ABs present voted in favor. NOTE: the remaining four voted by email, all voting to approve, with the final vote cast on February 14.

3. Nominations for NELAP AC Chair

In accordance with the recently adopted General Operations SOP 3-100, nominations for Chair are to be made at two consecutive meetings of the Council, with a vote at the third meeting. The same procedure will then follow, for the position of Vice Chair. Paul Bergeron nominated Aaren Alger for Chair, and Carl seconded the nomination. No other nominations were made, but additional nominations will be accepted at the March meeting. Voting will occur at the April meeting.

4. Request from Policy Committee

For several years now, Lynn Boysen has represented NELAP on Policy Committee, but she has notified that committee that her "real job" is too often interfering with her ability to represent the Council there, and she thinks it best if someone else takes that role. Paul asked for a volunteer to replace Lynn, but was met with silence. This is an important function that cannot remain unfilled indefinitely, so please, we need a volunteer to represent NELAP there.

5. AB Representatives on TNI Expert Committees

Following a plea from the Consensus Standards Development Program at conference, four ABs noted that one or more of their staff have (or will soon) apply to become members of various expert committees. The committees expressing particular need for AB representatives were Microbiology, PT, and the LAB Expert Committees.

6. Potential Interim Oversight of NELAP ABs between Evaluations

This issue arose during the AC's session at conference, and apparently it was discussed at length by the small workgroup that revised the NELAP Evaluation SOP during 2016, but was not included in that revision. The Council agreed to revisit the issue during that conversation.

Donna noted that EPA conducts a survey of all state drinking water certification/accreditation programs each year, between site visits. This survey is conducted through the regional offices, and is standardized to allow better evaluation of the results.

Discussion points are noted here.

- As the sole NELAP AB not accrediting drinking water, LDEQ was not familiar with the EPA survey and asked if it could be made available. Donna indicated that she thought she could do that
- Any survey used within the AC should require only information that can be used to evaluate performance, not just statistics on number and types of labs accredited
- Who should be charged with reviewing such a survey? The Evaluation Team (or a member thereof), the Lead Evaluator (cost becomes a factor), or perhaps a small group of AB representatives?
- Perhaps looking at the annual management reviews would be appropriate as a “survey”, or some portion of that review
- Internal Audits are another possible item that could be appropriately used as such a survey
- We should discuss this with both Jerry and Steve (NOTE: the NELAP evaluators did discuss the issue at their February call)

Since a change of this nature should only be undertaken at the beginning of an evaluation cycle, there is time to continue discussions of this issue for a while longer yet.

7. MUR Implementation

As discussed at conference, NY is fully implementing the 2017 MUR on April 1, and NJ will implement it on July 1. These “early-implementing” states will essentially force other ABs to change their FoA before they would otherwise plan to do so. The early implementation will have serious impacts on laboratories, since a lab’s primary AB may not accredit it for a method required by its secondary AB, and vice versa. Participants noted that this is primarily an issue with organic methods.

NJ indicated a willingness to find some way to accommodate delays in a lab’s transition to the newest method, at least up until October, 2018, when another primary AB does not offer accreditation for the newest method, but could not offer specifics. NY was not present on the call. VA noted that it cannot modify its database to even show the newest methods, until the state program office completes its rule revision to implement the MUR, sometime in mid-2019, but suggested that it could provide a letter to NJ. The consensus of the conversation was that the NELAP ABs will cooperate on a case-by-case basis to minimize the difficulties to labs from the variation in implementation times.

NOTE: This issue came up at the TNI Board meeting, February 14. NY and NJ may expect to see some correspondence from outside of TNI about this issue.

8. Other Issues from Conference

Despite extensive discussion about changing the frequency of PTs from two to one per year during the Assessment Forum, TNI’s PT Expert Committee has no plans to pursue such a change. The one per year WET PT frequency was not discussed.

There was also a discussion in the Assessment Forum about possible modification to the technical manager qualifications. NOTE: The Quality Systems Expert Committee is beginning to look at the revised ISO 17025 now, and will meet with the Council before it actually begins writing the next revision.

Carl noted that the LAB Expert Committee will likely retain the two years plus/minus six months frequency for routine assessments, in the Volume 2 revision, but will need further discussions within the committee. He also noted that LAB will review the 2003 NELAC standard's Chapter 6, for possible items that may need to be addressed in the revised V2 module.

9. SIR 319 Discussion

Aaren had asked that the AC discuss current AB practices with regard to a new Standards Interpretation Request (SIR,) before that SIR's validity is finally determined. The SIR itself cites V1M2 section 5.10.3.1 b) of the 2009 TNI Standard, with the following problem description:

Multiple laboratories of ours have experienced audits in which a NELAP assessor from a lab's primary accrediting body (AB) issued a finding that the lab was not compliant with the 2009 TNI Standard, V1M2, Section 5.10.3.1 b), which states that test reports shall identify "... a statement of compliance/non-compliance with requirements and/or specifications." The findings noted that the laboratory was not identifying in reports which methods were used for which the laboratory was not accredited by the AB, even in situations in which the testing was performed on samples collected in and analyzed solely for compliance with a non-NELAP state. This is a significant issue that has come up repeatedly. The question for the Committee is the following: Is the requirement in V1M2, Section 5.10.3.1 b) applicable and a statement of lack of NELAP accreditation required when a report case narrative clearly documents that the testing was performed for compliance in a non-NELAP state?

At first, participants were confused, since they normally only see SIRs after a response is posted to the SIR voting site for approval, but once the status was explained, they all indicated that the accreditation status of each method is required, and if a method is not accredited, then the reported result must be qualified to so indicate. They also noted that a different section actually applies, 5.10.11.c. The consensus conclusion was that the question as submitted is likely a dispute with the lab, but in any event is an implementation question, not an interpretation question, since the standard itself is very clear. Lynn thanked the group, in Aaren's absence, for helping to resolve how to handle the incoming SIR.

10. Next Meeting

The next meeting of the Council will be Monday, March 5, 2018. An agenda and any documents will be sent in advance.

Attachment 1

STATE	REPRESENTATIVE	PRESENT
FL	Carl Kircher E: carl.kircher@flhealth.gov	Yes
	Alternate: Vanessa Soto E: Vanessa.sotocontreras@flhealth.gov	No
IL	Celeste Crowley T: 217-557-0274 F: 217-524-6169 E: celeste.crowley@illinois.gov	Yes
	Alternate: Becky Hambelton Rebecca.Hambelton@Illinois.gov	No
	For information purposes: Kathy Marshall Kathy.Marshall@Illinois.gov	No
	For information purposes: John South John.South@illinois.gov	No
KS	Sara Hoffman sara.hoffman@ks.gov	Yes
	Alternate: N. Myron Gunsalus 785-291-3162 E: ngunsalus@ks.gov	Yes
	For Information Only: Paul Harrison	No
LA DEQ	Paul Bergeron T: 225-219-3247 E: Paul.Bergeron@la.gov	Yes
	Altérnate: Elizabeth West elizabeth.west@la.gov	Yes
LA DOH	Grant Aucoin Grant.aucoin@la.gov	Yes
	Alternate: Scott Miles Scott.Miles@la.gov	Yes
MN	Lynn Boysen E: lynn.boysen@state.mn.us	Yes

	Alternate: Stephanie Drier 651-201-5326 E: stephanie.drier@state.mn.us	No
NH	Bill Hall T: (603) 271-2998 F: (603) 271-5171 E: george.hall@des.nh.gov	No
NJ	Michele Potter T: (609) 984-3870 F: (609) 777-1774 E: michele.potter@dep.nj.gov	Yes
	Alternate : Rachel Ellis E: rachel.ellis@dep.nj.gov	No
NY	Victoria Pretti 518-485-5570 victoria.pretti@health.ny.gov	No
	Alternate: Lynn McNaughton lynn.mcnaughton@health.ny.gov	No
OR	Chris Redman christopher.l.redman@dhsosha.state.or.us	Yes
	Lizbeth Garcia Lizbeth.garcia@dhsosha.state.or.us	No
	Included for information purposes: Stephanie Ringsage, Manager, Laboratory Compliance Section 503-693-4126 stephanie.b.ringsage@state.or.us	Yes
	Included for information purposes: Scott Hoatson Agency Quality Assurance Officer Oregon Department of Environmental Quality 503-693-5786 E: hoatson.scott@deq.state.or.us	No
PA	Aaren Alger T: (717) 346-8212 F: (717) 346-8590 E: aaalger@pa.gov	No
	Alternate: Yumi Creason E: ycreason@pa.gov	No
TX	Ken Lancaster T: (512) 239-1990 E: Ken.Lancaster@tceq.texas.gov	No
	Alternate: Kristy Deaver T: (512) 239-6816 Kristy.deaver@tceq.texas.gov	No

UT	Kristin Brown T: (801) 965-2540 F: (801) 965-2544 E: kristinbrown@utah.gov	Yes
	Alternate: Alia Rauf T: 801-965-2511 E: arauf@utah.gov	No
VA	Cathy Westerman T: 804-648-4480 ext.391 E: cathy.westerman@dgs.virginia.gov	Yes
	Alternate: Ed Shaw T: 804-648-4480 ext.152 E: ed.shaw@dgs.virginia.gov	No
NELAP AC PA and EC	Lynn Bradley T: 540-885-5736 E: lynn.bradley@nelac-institute.org	Yes
EPA Liaison	Donna Ringel T: 732-321-4383 E: Ringel.Donna@epa.gov	Yes
California	Christine Sotelo Christine.Sotelo@waterboards.ca.gov	No
Oklahoma	David Caldwell E: David.Caldwell@deq.ok.gov	Yes
Guests:		