

**MINUTES OF
THE NELAC INSTITUTE'S
PROFICIENCY TESTING COMMITTEE
January 26, 2010
Chicago Forum on Laboratory Accreditation**

Call to order:

The following committee members were present for this meeting:

Kirstin McCracken, Chair
Shawn Kassner, Vice chair
Judy Morgan
Stephen Arpie
Stacie Metzler
Matt Sica
Amy Doupe
Dan Tholen
Scott Hoatson
Mitzi Miller

Kirstin provided an overview of the agenda for the Chicago meeting session.

The committee currently has 13 committee members and 4 active associates.

Kirstin reviewed 2009 accomplishments for the attendees:

- Resolved comments held for further review from previous standards balloting
- Processed requests for standards interpretations
- Formed four subcommittees to review NELAC 2003 appendices
- Hosted workshops on the new TNI standards requirements
- Approved 6 Tentative Interim Amendments (TIAs) critical to implementation of the new standard
- Expanded the committee membership

Committee plans for 2010 include the following:

- Continue PT program discussions on program purpose, frequency, composition, and other technical issues
- Prepare for implementation of the TNI standard
- Develop any needed guidance materials
- Develop additional TIAs as needed

Subcommittee updates:

Whole Effluent Toxicity (WET) Testing subcommittee – Stacie Metzler

Stacie reported the subcommittee has developed a charter and a working draft of WET testing for incorporation into the PT modules. They are reviewing requirements across all four PT modules as needed – working on Volume one first. The subcommittee is looking at NELAC 2003 chapter 2 appendix F to update language and revise it to fit the new TNI standards. They are removing references to other types of other sediment and soil. They have also removed other items that are covered by other areas of the standard such as quality systems and personnel requirements.

The subcommittee has completed work on V1 and will send it to the full PT committee. They will now evaluate material for V2-V4.

Microbiology subcommittee – Kirstin McCracken

Kirstin noted the Microbiology subcommittee charter is very similar to the WET subcommittee. She reported the subcommittee will propose a TIA for V1. Section 5.3.4 needs an additional sentence for reporting microbiology PT results. No changes are anticipated to V2 to V4. After presenting to the full PT committee, the subcommittee will prepare the TIA for review by LASC and CSDB. The TIA will then follow the remainder of the TIA process. It is possible that it be considered an editorial change, and Kirstin will be working with Bob Wyeth and Jerry Parr on determining the best path forward.

Radiochemistry subcommittee – Shawn Kassner

Shawn reported that this subcommittee has looked at NELAC 2003 appendix G. It only appeared to be drinking water references and also has many references to EPA National Standard criteria. They have developed a TIA for V3 included licensing requirements, removed the Safe Drinking Water Act reference, and the EPA national standard criteria. They are also developing a TIA for V2 to address that uncertainty should not be used in the evaluation. They do not anticipate changes for V1 and V4.

The proposed changes will recognize that solids require longer study times. The TIA will expand study time frames to 60 days for solid matrices. The recommendation will be provided to the full PT committee. It was asked that if uncertainty is not included, and the uncertainty is huge, could it invalidate the results? Could it overlap the acceptance criteria? It could, but this is the same for chemistry testing. For radiochemistry, there is always an activity level but the lab can report a < than value. Shawn welcomes additional comments on the approach being taken. Another approach would be to report uncertainty, but not use it for the evaluation. An AB would want to look at a PT that had a radically different uncertainty than the lab's regular samples. It was noted the ISO standard for PT is going to require reporting of uncertainty and how to appropriately use it.

Air & Emissions subcommittee – Amy Doupe

Amy reported this subcommittee is looking at NELAC 2003 appendix F chapter 2. FoPT tables have been created for the new Stationary Source Audit Sample (SSAS) program, but not for ambient air. The subcommittee narrowed its scope to only address ambient air, since SSAS and the National Environmental Field Activities Program (NEFAP) will cover the other items. They are inviting new members from the EPA air and Toxicity staff. The subcommittee is monitoring the first round of New Jersey's PT study. Shawn

and Amy have worked together to share information with SSAS. There are technical issues with transfer of sample between the PT canister and lab canisters. It is not certain what are the criteria likely to be, for example EPA used to require 80% pass of analytes. The PT Board is not yet working on an FoPT table for ambient air.

Review of Accreditation Body Survey – Judy Morgan

Judy noted that in 2007 an informal survey of state PT programs was conducted. In 2008-9, the PT Frequency subcommittee compared results from PT programs and evaluated 1 vs 2 PT performance results. At that time there was not enough conclusive information to justify a change to the current TNI PT program. It was decided to conduct a more formal survey that was inclusive of all accrediting authorities.

Judy explained the purpose of the survey is to determine the primary use of PT results. The previous survey showed a significant variety of purposes for the PT results. Survey content includes questions about audit activity, type of PT program, PT results (usability, prioritization), PT's required (program, frequency), actions for PT failure (suspension, etc.), revocation and corrective action, and reciprocity. It will also cover PT tracking (electronic, manual, passes, misses, etc.), perceived value of 1 vs 2 PTs, and PT requirements relative to NELAP participation. The future availability of a national database for PT tracking is also addressed (impacts on costs, etc.).

The PT committee's goal is to understand the differences between the existing programs in order to work toward a program that will be suitable for all agencies.

Action plan for the survey:

- Receive all comments on survey design by end of February
- Distribute survey by end of March
- Collect responses by end of April
- Assess results and provide a Preliminary Report during the August 2010 TNI summer meeting

The committee noted the need for an aggressive schedule so that this information can be used to move other issues forward. The issue is broader than just differences in the number of PTs across programs. The goal is to identify a consensus of the purpose of PTs. A "smart" PT program would help eliminate differences between programs.

The survey is web-based, and Judy noted the goal is to get 100% response. Committee members will have weekly follow up with non-responders. Kirstin suggested involving the NELAP Board as well to reduce misunderstanding in survey responses and as an outreach mechanism. Judy added she'll be able to get some real-time statistics throughout the survey. There are about 80-90 potential participants.

Brooke Connor asked if we are locking into 1 vs 2 PT question, or whether this should be a broader choice. Some programs may do it on a cycle for reassessment. We don't want to pigeon hole the program into one frequency or another since different analytes, etc.

may have different optimum frequencies. Judy added that multiple responses from the same state are possible if they are running split programs, etc. EPA regional information is needed as well, since the committee wants to contact as many PT users as possible. Anyone with further comments or information should pass it along to Judy Morgan.

Open discussion:

Kirstin asked for audience input on the committee's next steps and whether there are other topics related to PT on which the committee should consider working.

Judy noted that she would like to receive any comments the audience may have in order to refine the survey questions, especially anything that may represent an obstacle for participation for any of the ABs.

The idea of a national PT database is something of a pipedream. Security and access issues would have to be addressed. The cost of PT programs is sometimes cited as a reason states are doing one thing or another (the cost to switch from a current system or the cost of monitoring more PTs than are already being done). States may vary in whether a PT has to be performed when PT samples are available or when the FoPT is available. The database should also include other information besides pass/fail (performance versus acceptance rates).

There was a suggestion to expand the PT program into soils, sediments, sludge, and/or tissue samples. More soils are being tested so this may be a new area to look at.

Ultimately the goal of the PT program should be to better match PT samples to the analyte and technology. It is difficult to judge laboratories with different technology. Multi-level type PTs that are specific for a technology are available from providers now, they are just not necessarily a NELAP PT. The question is perhaps the states' acceptance of such samples. These PTs are not required for accreditation so this could be an issue for the PT Board to take up. Outside the scope of NELAC the state can do whatever it wants with respect to recognition of custom PTs.

Kirstin noted that the six TIAs finalized by the committee in 2009 need to be approved through the full consensus process by 2011. Kirstin asked the committee to work on timelines for various current work items.

Survey – timeline is described above

Subcommittee work on Appendices:

The subcommittees will finish development of the TIAs, and post them for public review in May with comments due by May 30. A TNI membership notice will go out when the new TIAs are posted for public comment. A recent revision to TNI SOP 2-001 for standards development allows the TIAs to be processed without opening the full standard for revision. TIAs must be taken through the consensus process within 2 years from committee adoption.

There was discussion on the transition to LOQ reporting – some guidance will be needed. ABs need to be prepared when PTs start being reported as “< than” values. Fred Choske explained how it will be handled in CA. Some examples are provided in the TIA language. The committee discussed the situations in which the data would be flagged as being inconsistent with the reporting limit. Also, current state systems don’t have a field for collecting this information. Could be flagged as “acceptable*” so new field is not needed. The committee will query some other ABs to see what will work for their systems. The committee will develop guidance that helps meet AB needs since for labs it’s not much of a change. Mitzi volunteered to lead the development of the guidance document with Scott, Shawn to help. The guidance document could be pulled together as a draft by April.

For the existing TIAs to be processed in a timely manner, the Working Draft Standards need to be developed in advance of the August 2010 TNI meeting. The WDS must be published 30 days prior to a TNI meeting and comments are accepted for 15 days after the meeting too.

Kirstin also noted that the committee needs to consider nominations for chair and vice chair for 2010 at their February meeting.

The PT committee meets the second Tuesday of the month. Minutes are posted about 1 month after.

The meeting was adjourned at 11:20 am.