

CONSISTENCY IMPROVEMENT TASK FORCE

Helping ABs
Manage the Chaos

Managing Assessors



Managing ABs



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Cats and ABs

Common Characteristics

- **Law of Cat Composition**

A cat is composed of Matter + Anti-Matter + It Doesn't Matter.

- **Law of the Space-Time Continuum**

Given enough time, a cat will inspect just about any space.

- **Law of Concentration of Mass**

A cat's mass increases linearly with his desire not to be moved.

Cats and ABs

Common Characteristics

- **Law of Equidistant Separation**

All cats in a given room will locate at points equidistant from each other, and equidistant from the center of the room. Every cat knows that he is the center of the universe -- and it's dangerous for universes to collide.

Vision Statement

- TNI's vision is a true national accreditation program, whereby all entities involved in the generation of environmental measurement data within the United States are accredited to one uniform, rigorous, and robust program that has been implemented ***consistently*** nationwide and focuses on the technical competence of the entity pursuing accreditation. (ital. added)

So Why the Chaos?

- Chaos is inherent in all compounded things. Strive on with diligence.

Buddha

- Anything you build on a large scale or with intense passion invites chaos.

Francis Ford Coppola

- Any change is resisted because bureaucrats have a vested interest in the chaos in which they exist.

Richard M. Nixon

Confounded because it's Compounded

- 5 EPA regulatory programs
- 13 + state government agencies
- At least 5 major method authorship groups
- 8 technical disciplines
- Other similar and overlapping accreditation programs (e.g. DOD, DOE)

There's a storm front coming – Billy Joel



Potential Issues in Consistency

- Interpretation/Application of the Standard
- Decisions to grant/deny/revoke accreditation
- Scopes of Accreditation
- Accreditation periods and schedules
- Corrective Action follow-up from PTs and Deficiencies
- Frequency and depth of Assessor Training
- Assessor Evaluation procedures
- Depth and primary focus of assessments

Interpretation/Application of the Standard

- Between assessors within an AB
- Between ABs
- Between Regulatory Agencies
- Within TNI at large

Decisions to grant/deny/revoke accreditation

- ⦿ How good is “good enough”?
- ⦿ How bad is “unacceptable”?
- ⦿ How many “2nd chances” while maintaining full accreditation?

Scopes of Accreditation

What is being accredited?

How is it displayed?

- Technology
- Matrix
- Method
- Method version
- Specific analyte
- Analytical range

Accreditation periods and schedules

Standard says reassessment must occur every “2 years \pm 6 months”

- ⦿ What if an AB assesses 1 lab every 18 months and another lab every 30 months?
- ⦿ What if an AB averages 22 months between assessments and another averages 29.5 months?

Corrective Action follow-up from PTs and Deficiencies

- Do all Corrective Actions resulting from assessment need to be complete including implementation and follow-up prior to granting reaccreditation or is a plan adequate?
- How are repeat deficiencies handled?

Assessor Training

All ABs are required to ensure assessors are “adequately” trained but each program may vary significantly in

- ⦿ Content/depth
- ⦿ Frequency
- ⦿ Examination

Assessor Evaluation

- Frequency
- What specifically is evaluated and how
 - Reports
 - Documentation/Records
 - Timeliness
 - Interview style
 - Assessment effectiveness
 - Complaints/surveys
- What actions are taken as a result of the evaluation?

Assessment Process

- ⦿ How many assessor hours / assessment?
- ⦿ How much preliminary review is done?
- ⦿ How much focus is on Quality System vs Technical Competence?
- ⦿ How much data is reviewed?
- ⦿ Are assessor's technical expertise aligned with the scope of the lab?
- ⦿ Checklists – what's on them?

Oh, a storm is threat'ning
My very life today
If I don't get some shelter
Oh yeah, I'm gonna fade away
Gimme Shelter – The Rolling Stones



If we want consistency, we have to find ways to control for these potential sources of inconsistency.

- One way to do this is through AB evaluations

AB Evaluation Challenges

- Evaluators are lab assessment experts, but evaluating an AB is quite a different animal.
- Evaluation team personnel are variable.
- Although a primary task of an AB is lab assessment, evaluation of this activity is limited to a very small sampling due to the cost and logistics involved.
- AB evaluation is subject to all of the previously discussed challenges

Ensuring Evaluation Consistency

- Evaluators received training specific to evaluating ABs.
- An SOP and a checklist have been developed and used for all evaluations.
- TNI created a position for a QAO
 - Reports to the board
 - Attends all AB evaluations
 - Ensures that they are performed consistently and thoroughly.

Consistency,
like order,
requires
determined effort
and planning

The natural state of order
without deliberate activity.



Consistency Plan

The CITF team recommends that every AB develop a formal written plan for how they intend to ensure consistency.

Elements of a Consistency Plan

- Should include a commitment to maintaining consistency within the TNI community
- Should address how the AB will achieve consistency, both internally and with other ABs
 - Areas of concern
 - Tools/best practices to be used
- May address known and deliberate differences from the TNI community

Disclaimer

The author of this presentation wishes to point out, in case it was not already embarrassingly, ridiculously obvious, that the opinions she expresses within it are her own, and they do not represent in any way those of the various affiliated entities, which include TNI, NELAP, EPA, any accreditation organization, or her husband.

Might some of these help?

- ⦿ National Database of accreditations (all scopes expressed the same way)
- ⦿ A universally used Training Curriculum and exam
- ⦿ TNI Standards Interpretation decisions not only published on the website, but emailed to TNI membership
- ⦿ A functional appeals procedure within NELAP that is acceptable to all participating states

Might some of these help?

- ⦿ Increased opportunities for one AB to observe or participate in assessments of another
- ⦿ A universally used assessor evaluation procedure
- ⦿ Additional requirements from individual states that are overlaid on the TNI standard should be
 - Defined and published
 - Evaluated for potential incorporation to the standard

"I did then what I knew how to do.
Now that I know better, I do better."

Maya Angelou



CITF Accreditation Bodies Subgroup

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