

**Laboratory Accreditation Body Committee Expert Committee Meeting
January 31, 2011
TNI Forum on Laboratory Accreditation
Savannah, GA**

Members in Attendance:

Joe Aiello (Chair)
Lynn Bradley
Art Clark
Sharon Mertens
Steve Arms
Jeff Flowers
Aurora Shields

Joe welcomed the session participants and committee members introduced themselves. Joe noted the committee membership has dwindled. He invited interested parties to apply for membership. In particular the committee is seeking a member who can be a liaison with the LAS EC.

Joe distributed the updated committee charter last week for review. Committee members in attendance had no comments. Joe will finalize the updated charter with the CSD EC.

AB Application / Evaluation Information on the TNI Website:

Joe explained that Lynn Bradley is now working as the Program Administrator for the NELAP Accreditation Council and is putting documentation in place for the TNI standards implementation on July 1. The Evaluation SOP is awaiting TNI Policy committee approval and is expected to be approved soon. Lynn is making sure all the right supporting materials are in the right places on the website. The presentation on how to become an AB was out of date as it is based on the NELAC Standard. The flow charts and slide presentation need to be updated. Lynn is seeking real world input about what is needed to apply and prepare to become an AB. In the past the process has been for potential ABs to talk to some existing ABs, look at the evaluation SOP, look at the slides, fill out the application, checklist, etc., and talk to TNI. Then the evaluation team is formed. There is now a \$6000 annual fee – Lynn needs to determine if this is due with the application or when approved as an AB. Travel expenses for the site visit are also paid. All time frames are now 30 days for consistency. The On Site AB program evaluation process still needs updating – Brooke Connor did the original version. There is also a link to an EPA page that will probably disappear. Lynn anticipates everything should be done in 2-3 months.

Sharon asked if this topic can be on the next LAB meeting agenda. It is on the updated charter, but Lynn will talk to Joe about discussion at the next expert committee meeting.

Visionary Look at the Ways ABs Conduct Business

Joe introduced topic of whether states can do something different as ABs to be more efficient, make better use of resources, etc. Joe is currently developing a white paper on this topic for NJ's programs for an initiative called "Transformation". It also involves getting feedback using external stakeholder meetings. Joe briefly reviewed some potential ideas and invited the session participants to suggest ideas as well.

- Teleconferencing has become a very common practice and video conferencing is a logical next step. This is a tool that could be used for less complicated assessments or as a way of performing surveillance or out of state assessments.
- Assessment teams – use third-party assessors as part of assessment team led by state staff. New way of using limited resources. Joe has been proposing this to his state.
- Single national accreditation or universal secondary accreditation – something like a drivers license for labs that transfers to other states as long as the lab abides by any additional requirements. State would have the right to charge for a “business” license and provide rulebook if there are extra requirements for the labs.
- Use of non-state ABs or third-party ABs – this may also help ABs that have travel restrictions in getting to out-of-state labs.
- EPA has used a graded approach to quality systems to determine the frequency of assessments. If a lab is just testing pH, can you assess them less frequently due to lack of complexity, etc. this could include incentives for the regulated entity to perform well in return for less frequent assessments.
- Local and state gov’ts are under constraints like never before and without a strong accreditation program, the cheaters will be back in business.
- Third party ABs would be expected to have the same credentials as state ABs. Also don’t want to lose lead role in state gov’t by handing the whole process to a 3rd party. Use 3rd party assessors, but not accreditors (leave that in the hands of the state), as this maintains credibility of process.
- Surveillance vs full assessment in the TNI standards. ABs could make greater use of desk or electronic reviews and develop a tiered approach to the assessment process. Fits with graded approach mentioned earlier. ABs should also consider the category of non-conformances – major or minor – to determine how to best use their resources.
- Suggestion to look at the Canadian accreditation system as a possible example. It utilizes a mix of private and public sector assessment. Assessors move between labs and learn about different standards, etc. Some ABs are using 3rd party assessors now, but they don’t swap across states.
- Think of ways that ABs can cross-pollinate ideas. It happens informally, but not on a regular basis. Joe noted pre-NELAC, NJ tried to reach out to other ABs when assessing a lab in another state. NELAC AC calls are open, but non-ABs need to arrange for participation. Steve also noted the state assessors call and assessor forum model as ways that ABs could share best practices.
- There always seem to be a few ABs that say they can’t implement certain practices. Are there impediments to implementation in NELAP or non-NELAP ABs. Are there issues in AB rules that prevent some of these ideas? Need to know what the roadblocks are.
- Standardize applications for labs so they can use one application for all ABs. This should be done in electronic format and it could interface with the upcoming TNI lab database.

- PT issues could be simplified if information is available via a database. This would also help with consistency. It could also be a service that TNI could sell (1 PT review rather than multiple reviews). It takes a lot of AB resources for one PT review and after one review it could be accessible to all.

Lynn noted there is an AB Assistance Task Force that will be considering new ideas as well.

Assembling AB Evaluation Teams in the Future

Art Clark relayed actions from the annual meeting of EPA regional science and technology coordinators which took place in Nov. 2010. This group has been considering the level of EPA involvement in AB assessments. In late 2009 the group had drafted a policy on AB evaluations where EPA staff would participate, but not lead teams for this latest round of evaluations. It was the last round that guaranteed EPA involvement in the assessment cycle. During the most recent meeting that policy was revisited to suggest the use of 3rd party evaluators in the next round of AB evaluations (end of 2013). The following comments and questions were raised:

- EPA has always gone to these states for the DW program, why is this a problem to do it for TNI? There is already a budget for doing those audits. TNI assessment is a separate deal. Would they accept 3rd party assessors for DW program as well? NELAP accreditation will still be accepted for DW, but need to have further discussion with the EPA DW program as they were not part of the decision. EPA Regions have differing opinions on their involvement.
- Many of these issues hinge back to the TNI training development to be undertaken under the new EPA funding. Is this a unilateral decision or will there be variability among the Regions?
- EPA DW administrator has decision making power on these issues – wouldn't the decision come from HQ rather than the regions? It was noted that EPA has delegated DW compliance to the State/EPA Regions DW programs, but could that policy be rescinded? Greg Carroll's deputy was present, but he didn't have a specific answer on this.
- Did EPA Regions want to have any input into who the 3rd parties are? EPA would probably expect the same caliber of assessor. If those assessors are already contracted to ABs there is a big conflict of interest.
- Where are all the 3rd party auditors going to come from? There will be the same consistency issues as with state assessors. Training is the root issue. There may be more burden on labs financially to stay accredited as states raise fees.

Joe thanked the session participants for their feedback on these issues.