

## Summary of the NELAP Accreditation Council Meeting

November 6, 2017 1:30 pm Eastern

### 1. Roll Call and Approval of Minutes

The NELAP Accreditation Council (AC) met at 1:30 pm on Monday, November 6, 2017. Those present are listed in Attachment 1. Only a fifty percent quorum was present, and not two-thirds, probably due to an overlapping call of the APHL State Assessor Forum, where the Drinking Water Certification Officer course was being discussed. Minutes from October 2 were approved.

### 2. LAMS Discussion

Dan Hickman, TNI's Database Administrator, was invited to join this call for follow-up discussions of two issues from conference, and also (since he was present) to discuss a request from LDEQ to add a number of new technologies to LAMS.

First, Dan explained that he recommends that, if a lab has more than one primary AB, the AB doing the major quality assessment be the designated "primary" for purposes of LAMS. This would mean that if one of the other primary ABs uploads different information for a lab, it will be rejected as an error. AB representatives on the call agreed with this recommendation. Dan noted that, if the designated "primary" changes (i.e., some other primary is chosen by the lab takes over the role of quality system assessments), that change would need to be made manually, in the database, and could not be part of the automatic upload process.

Second, regarding the table of recognitions that appears in LAMS for each individual AB, only matrix/technology combinations presently offered by that AB appear. If an AB wishes to update the table of recognitions, then all possible matrix/tech combinations appear for possible selection. Dan had inquired whether labs (and other users) should see all possible matrix/tech combinations, or just the currently offered ones. He noted that, when LAMS was designed, this view was included for use by the NELAP evaluators, to verify an AB's offerings. The consensus of ABs represented on the call was to keep the current way of presenting the information, with no changes.

Lastly, AB representatives were invited to look at the proposed additions to the table of technologies. Most were accepted without comment, with the exceptions noted below:

- cryogenic pre-concentration should be covered under "prep", since specific preps are not included in the technology list in order to avoid a PT requirement for prep methods,
- hi-res GC/hi-res MS should be just GC/hi-res MS, since packed columns are no longer used for GC, and
- the technology, "ion exclusion chromatography anion suppression with product manual" should not be accepted, as this is considered a distinction too fine to be separate from "IECAS."

Additional conversations included discussion of whether chemical luminescence should become "chem-lum" and a request to correct the spelling of absorptiometric by replacing the erroneous letter b with the letter c. Participants thanked Dan for clarifying these issues, and he departed the call.

### 3. Recommendation to Renew NY Certificate of Recognition

The required two-thirds quorum was not present, so this issue could not be voted upon. There was no discussion requested.

#### **4. Revisions to NELAP Evaluator Assignments**

Now that LA DOH is able to contribute an evaluator to this cycle of NELAP evaluations, several other assignments were rearranged with the permission of the previously assigned evaluators, and one QA Reviewer will perform two reviews in order to allow the LA DOH program manager to acquire more experience before being asked to perform this function. There were no objections to the proposed updates to assignments.

#### **5. Drinking Water Methods – Version Control Needed**

Cathy and Michele had asked to discuss drinking water methods, from the perspective of requiring labs to begin using the newest versions in Standard Methods. EPA does not remove (or un-approve) older methods, even when the newer ones are eventually approved, so that labs can legitimately use outdated methodology and/or QC for drinking water data that will be reported for drinking water compliance purposes.

This issue has been raised with the Environmental Laboratory Advisory Board (ELAB), since it affects all states with drinking water primacy, and not just NELAP states. Cathy noted that the topic will likely be discussed at the Monday afternoon ELAB session, at conference in Albuquerque (January 22, 2018 – a call-in number will be available, ask Lynn if you cannot be present in the room.) Cathy brought this to the attention of the AC so that they would be aware of these concerns and could be involved in these discussions as the ABs deem important.

Cathy noted that she located a requirement that labs should use the most current method from Standard Methods in Virginia regulations, so that labs with VA primary or secondary have been asked to move to the most current Standard Methods version by July 2018. Still, participants agreed that it is important to have the EPA drinking water program office (OGWDW), or the EPA regional offices, express a clear preference for the most recent methods to be used if ABs are to ensure that data are consistent and comparable between labs. Our EPA Liaison, Donna Ringel (EPA Region 2,) stated that it is highly unlikely that the Agency will be able to do this anytime soon.

#### **6. Decoupling the AB Recognition Cycle from Evaluation Cycle**

A draft policy, based on discussions in several AC meetings, and with NELAP evaluators, was offered for the Council's consideration. With minimal discussion, participants approved sharing the draft with the NELAP evaluators and asked that LASEC be asked to look at it, as well. See Attachment 2 for the draft document.

#### **6. New Business**

With time remaining in the meeting schedule, two items of new business were raised.

First, IL asked about whether any ABs have data systems that “write assessment reports” as well as helping to manage the other aspects of an AB's data requirements. Apparently, MN's ELDO system is no longer being shared freely with other NELAP ABs due to staffing issues

there, but the other two systems mentioned were OK's software from Lab Data Consultants (California) and KS's database, AD Manager" which UT also uses and is supplied by Paul Ellingson's firm (name uncertain.) IL may also seek to contact Susan Wyatt who was instrumental in setting up MN's database; Susan is no longer with MN.

Cathy inquired about the data retention policies of other ABs, particularly whether a copy of each lab's quality manual (QM) is retained. ABs on the call responded, with some retaining only the QM, others retaining all (paper) documents or all electronic documents. Several consider all or most of the documents used for an assessment to be "on loan" from the lab, to be either returned or shredded at the conclusion of the biennial assessment (depending on the lab's preference.) Also, different states have different document retention policies – for instance, PA requires that documents be retained in state archives for twelve years.

## **7. Next Meeting**

The next meeting of the Council will be on Monday, December 4, 2017, at 1:30 pm Eastern time. An agenda and documents will be provided in advance of the meeting, with the reminder notice. The NY renewal recommendation will require that a quorum be present, so please plan to have a voting representative participate.

**Attachment 1**

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

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

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

Attachment 2 – Draft Policy on **Relationship of NELAP AB Certificates of Recognition and the NELAP Evaluation Process**

I. PURPOSE AND APPLICABILITY

This policy describes the relationship between issuance of Certificates of Recognition and the three-year evaluation cycle for the National Environmental Laboratory Accreditation Program (NELAP) Accreditation Bodies (ABs.)

II. DEFINITIONS

**Certificate of Recognition:** the document that officially designates a NELAP AB as being “approved” to accredit laboratories to the standard adopted by the NELAP AC. A certificate is valid for three (3) years, so that the evaluation process occurs every three years for each AB.

**Evaluation Team (ET):** a team comprised of the LE, other State AB and/or EPA representatives, and any other technical evaluators approved by the NELAP AC to conduct a review of an AB for the purposes of granting NELAP recognition to the AB.

**Lead Evaluator (LE):** the chosen member of the ET who provides direction for the ET and is responsible for issuing the written final recommendation regarding AB recognition, based on input from the entire team.

**NELAP Accreditation Body (AB):** one of the AB organizations within NELAP. An AB is responsible for assessing a laboratory’s total quality system, on-site assessment, and PT performance tracking for fields of accreditation.

**NELAP Accreditation Council (AC):** the body within TNI’s NELAP program comprised of representatives of each NELAP AB and holding final authority for implementation of the program for the accreditation of environmental laboratories.

III. RELATED DOCUMENTS

NELAP Evaluation SOP 3-102 (*NOTE: may require minor revision to accommodate this policy*)

IV. CERTIFICATES OF RECOGNITION

Beginning with the start of The NELAC Institute’s (TNI’s) fiscal year 2019, in October 2018, all NELAP ABs in good standing will be issued a Certificate of Recognition. “Good standing” means that the AB’s most recent evaluation was satisfactory and that its continued recognition was approved by the NELAP Accreditation Council (AC) at the conclusion of that evaluation.

New certificates will be issued annually to each AB in NELAP, contingent upon the most recent evaluation being satisfactory and assuming that the AB wishes to continue with the program. Previously, new certificates were issued only at the completion of the evaluation process,

regardless of time elapsed since the previous certificate was issued.

#### V. NELAP EVALUATION CYCLE CHANGES RESULTING FROM THIS POLICY

The NELAP ABs are evaluated approximately once every three years, in accordance with the NELAP Evaluation SOP 3-102, by a team of peers led by a Lead Evaluator (LE) who is contracted to The NELAC Institute. Depending on the wishes of the EPA region in which the AB is located (the states are divided into ten EPA regions), this team may include EPA regional staff.

The timing and team composition for these evaluations has shifted since the inception of NELAP. The AC finds that, with one single LE and an alternate LE for instances where conflict of interest may be present, it is desirable and practical to formally schedule these evaluations on a regular basis over the three year cycle, rather than have each evaluation begin at some date dependent on the conclusion of a prior evaluation.

Thus, beginning with the evaluation cycle that starts in November, 2019, NELAP ABs will be scheduled to receive their renewal letters (requesting renewal applications) at intervals of two months, in the order in which their evaluations were concluded during the 2016-2019 cycle of evaluations. This interval will permit the LE to schedule the steps of the evaluation, as described in SOP 3-102, on a systematic basis, and will enable the individual ABs to proceed through the process on a more clearly defined schedule.

#### VI. CONTINUED MEMBERSHIP IN NELAP AC

As documented in SOP 3-102, the final step of an AB evaluation is the decision of the NELAP AC concerning whether to accept the recommendation of the evaluation team, for continued recognition, as presented by the LE. In the unexpected event that the evaluation is unsatisfactory, and the NELAP AC accepts a recommendation not to renew an AB's recognition, then the NELAP AC will determine a suitable amount of time to transition the AB's accredited labs to other NELAP ABs (probably two to four months) and, based on that determination, set an "end date" for the AB's then-currently-valid Certificate of Recognition. In this case, the Certificate issued to that NELAP AB would expire on the date determined by the NELAP AC, regardless of the "normal" annual expiration date on the Certificate when it was issued.