

Non-Governmental Accreditation Body Working Group
August 7, 2013

1. Roll Call

Alfredo Sotomayor called the Non-Governmental Accreditation Body (NGAB) Working Group meeting to order at 1:30 pm CDT on August 7, 2013 at the summer meeting in San Antonio, Texas. The following members were present:

NAME	Stakeholder Group	PRESENT
Alfredo Sotomayor, Chair	TNI Board member	✓
Marlene Moore	NEFAP	✓
Kristin Brown	NELAP AB	✓
Jim Todaro	Laboratory	Absent
Cheryl Morton	Non-governmental accreditation body	✓
Steve Arms	Chair, TNI Advocacy Committee	✓
Carol Batterton	TNI staff support	✓
Jerry Parr	TNI Executive Director	Absent

2. Presentation of work group status and recommendations

Alfredo Sotomayor presented a powerpoint presentation outlining the group's progress to date and reviewing draft recommendations. The group received the following comments, questions and suggestions:

Sections 1.0, 2.0, 3.0, and 4.0

- The NGAB should discuss with non-NELAP states how they would view accreditations granted by NGABs
- The definitions section should include references to the source of definitions, e.g., ISO/IEC 1700, TNI ELS, etc.
- We need to check the definition of "finding". There may be a conflict between ISO and the TNI standards

Section 5.0

- Could an AB applicant reject a Lead evaluator (LE) if they perceive a conflict of interest? It was noted that it is not necessarily a conflict of interest if the LE works for a competitor.

- We should consider selecting state evaluators from states that can accept an NGAB accreditation. Will help states get comfortable with the process.
- Should also consider using contractors for the evaluation team.

Section 6.0

Evaluation frequency

- What is the basis for the 3 yr (NELAP) vs. 4 yr (NEFAP) evaluation cycles? The 4 yr cycle is based on ILAC recognition cycle; the 3 yr cycle is based on EPA drinking water certification cycle. The evaluation cycle for PTOBs is 2 years.
- Some participants expressed concern that we might jeopardize EPA's acceptance of NELAP accreditation if we allowed a 4 year evaluation cycle. If we used a 4 year cycle, NGABs could not issue DW accreditations. Would this be a big obstacle?
- How are states that recognize NGABs now handling evaluation cycles? We should check on Washington State and New Mexico.
- Could we design a process does a 3 year evaluation process, but also takes into account the ILAC frequency? Suggestions included an abbreviated lab observation every 3years and a full evaluation every 4 years. We should explore ways to stay with a 3 year evaluation cycle, but try to maximize efficiency with ILAC cycle.
- Other suggestions included allowing the onsite to occur off the 3 year cycle. Recognize the ILAC process and then do an observation every 3 years. Could also do a 2year/4 year cycle with a desk review every 2 years and onsite every 4 years with ILAC.
- It was noted that NEFAP doesn't actually do an onsite evaluation if NGAB is ILAC recognized. ILAC recognition costs \$25,000 - \$30,000. We should explore ways to harmonize PT, NELAP and NEFAP to reduce cost and time. However, labs who want to have NGAB recognition need to understand that there will be a cost involved. It was also noted that not all NGABs are ILAC recognized.

Recognition Committee

- In NEFAP, the evaluation team does not make a recognition recommendation. The Recognition Committee makes the decision. The decision is based on objective evidence. Is more work for the Recognition Committee, but may result in a more objective decision. Evaluation team should provide an evaluation summary for the Recognition Committee.
- The appeals process is part of another SOP.
- We should think about stakeholder distribution on the recognition committee.
- It was noted that there are no timeframes for evaluation process and recognition committee in the NEFAP SOP because all are volunteers.
- Should keep in mind that evaluation team may need to be expanded to allow additional members for technical expertise.

Application Fees

- Current NELAP fees are \$6,000 per state. Can we consolidate fees? Fees should be based on costs.

- Some participants wanted to see fees consistent among all ABs. There should be fairness and cost recovery.

Consistency

- How to assure consistency among NELAP and NGABs? Use the DoD model and have a conclave on an annual basis to discuss issues. DoD also uses monthly AB calls and assessor training.
- Need to make sure that ABs participating in multiple programs don't get preferential treatment.

Section 7.0

- Checklist in order of the standards is OK with NELAP
- NGABs should use the same checklist that NELAP is using.
- LASEC should approve the checklists, as they do now. NELAP AC approval may not be necessary.
- The AB application form will need revision.

Section 8.0

- The SOP should state that the evaluation report can be obtained from the AB.
- We should have a process for handling Confidential Business Information (CBI). The process should differentiate between the evaluation report and evaluation package. The report could be OK for distribution, but the package may contain CBI. The process should be consistent across the board (current NELAP and future NGABs). The report is available from the AB on request.
- Also, suggestion that we look at ILAC IAF 8-3 on how to report on evaluation of accreditation bodies.

Section 9.0

- The evaluation SOP should be reviewed every 3 years or as needed.

Other

- We should reach out to NACLA for their process for evaluating 3rd party ABs.

3. Next Meeting

The next meeting will be scheduled by email. We will continue developing draft SOPs with these comments in mind.