Non-Governmental Accreditation Body Recognition Concept Paper

Background:
In our previous report to the TNI Board, the ABTF II reported that an evaluation process similar to the current NELAP/NEFAP Evaluation SOP can be designed to approve Non-Governmental Accreditation Bodies (NGABs) as meeting requirements of the TNI standards to accredit laboratories. However, a major question remained as to what body will provide oversight and approval for the NGABs, since some state ABs indicated that they cannot allow an NGAB to be a member of the NELAP AC.

The ABTF II recommended the establishment of a separate approval and oversight body for NGABs as the best and only path forward. The Board agreed with this proposal and directed the ABTF II to begin development of this concept and to keep the Board advised of their status. This paper describes the elements of a recognition process for NGABs as currently envisioned by the ABTF II.

Basic Concept:
A Recognition Committee reporting to the TNI Board will evaluate NGABs for conformance with the TNI environmental laboratory standard. The ABTF II believes that the process to evaluate NGABs should be no less rigorous than that used currently for NELAP recognition. To achieve this, the policies and procedures applied to NGAB recognition should be the same or similar to those used for NELAP recognition.

Purpose:
The role of this committee is to provide a determination that an NGAB meets the requirements of the TNI standard and is recognized to grant accreditation to laboratories in conformance with the applicable TNI standards for the environmental laboratory sector, and is capable of managing an accreditation program in a consistent, uniform manner.

Process:
Accreditation Bodies will be evaluated initially and at a minimum of once every three (3) years. This evaluation must include:
- Completeness and technical reviews of the application package,
- An on-site evaluation,
- ILAC recognition may serve as demonstration that the NGAB is qualified to manage an accreditation program.
- Observation of the NGAB conducting an assessment,
- On-site evaluation report(s) with findings for both the on-site evaluation and the observation, and
• Recommendations to the Recognition Committee regarding recognition or denial of recognition.

All evaluation team members must meet minimum requirements for training and professional qualifications and must successfully complete the TNI basic evaluator training course. The evaluation team must:

• Have at least one member who meets the education, experience and training requirements for laboratory assessors specified in the applicable TNI standards; and

• Have at least one other member with experience that includes at least one of the following:
  1) one year of experience implementing an accreditation program; or
  2) one year experience developing or participating at a managerial level in a laboratory accreditation program.

• Have documentation that verifies freedom from any conflict of interest that would compromise acting in an impartial, nondiscriminatory manner.

The Lead Evaluator (LE) is responsible for

• Planning the evaluation activities.
• Ensuring that technical review is complete before the onsite is conducted.
• Being responsible for the quality systems aspects of the evaluation process.

The Evaluation Coordinator (EC) is a TNI staff person that has the following duties

• Assisting the evaluation team by assuring all communication between the evaluation team and the NGAB, and between the evaluation team and the Recognition Committee occurs in a timely manner.
• Tracking and documents that all aspects of NGAB evaluations are performed in a timely manner in conformance with the Evaluation SOP (to be developed). Note: Ensuring timeliness may not be an appropriate responsibility for this position.
• Reviewing the NGAB application for completeness, with concurrence of the LE.
• Reviewing the evaluation reports for completeness and consistency according to the evaluation SOP and the TNI standards.

Note: The QAO function was left out intentionally. The NGABs will be a smaller group than the current NELAP ABs and the QAO function may not be needed. Additionally, if TNI contracts the LE position for NGABs, then only one person or entity will be conducting evaluations, and that may also negate the need for a QAO. The definition and function of Evaluation Coordinator are included for now, but it may be possible to combine the LE and EC positions at some point.
Recognition Committee

The committee is composed of five members selected and voted on by the TNI Board to grant the final decision on the recognition of non-governmental accreditation bodies. The TNI Board appoints the chair of the committee.

- Note: The ABTF II does not have a recommendation as to whether this committee should be called “recognition” or “approval” committee. Some feel that it should be called “approval” since “recognition” carries the connotation of “mutual” which will not necessarily be the case for all current NELAP ABs. The committee could also be called “NGAB recognition committee” to differentiate. The task force agreed to leave this decision until after further discussion and input from the Board.

Recognition Committee Members:

- Are appointed by the TNI Board
- Must be a TNI Member in good standing
- Must have no conflict of interest

A committee member does not have to be a current member of the Board of Directors but must have the following credentials:

- Must be familiar with TNI NELAP and NEFAP programs and standards and procedures
- Must have TNI–recognized training on the applicable Evaluation SOP

Recognition Committee Tasks:

- Review the Evaluation Team’s recommendation and supporting documents. Provide a decision on the Recognition of the AB. The vote is by two-thirds majority.
- Submit a letter on the decision to the applicant NGAB and TNI Board of Directors

Requested Action:

The ABTF II requests input from TNI Board on this concept and concurrence to continue development of this approval process for NGABs.