

1
SUMMARY OF THE
INELA
ON-SITE ASSESSMENT COMMITTEE MEETING

NOVEMBER 1, 2006

The On-Site Assessment (OSA) Committee of the Institute for National Environmental Laboratory Accreditation (INELA) met on November 1, 2006 at 12:00 PM (ET) by teleconference.

Chairperson Mr. Alfredo Sotomayor, of the Wisconsin Department of Natural Resources, led the meeting. A list of participants is given in Attachment A. A list of the action items generated during this meeting and uncompleted items from previous meetings is included in Attachment B. The meeting agenda is given in Attachment C.

ANNOUNCEMENTS AND BRIEF UPDATE ON SELF SUFFICIENCY EFFORT

The Partnership Planning Team (PPT) completed its report and it will be available at the INELA and National Environmental Laboratory Accreditation Conference (NELAC) websites. The PPT recommends combining the operations of INELA and NELAC into a new organization called The NELAC Institute (TNI). The proposed bylaws for TNI will be ready for distribution later this week. The report offers a series of recommendations on the corporate structure, governance, staff, budget, and programs of the new organization. Mr. Sotomayor encouraged all committee members to read the report.

If the recommendations of the PPT are endorsed, the NELAC and INELA Boards will sign a new memorandum of understanding in a meeting of the two boards to be held on November 6, 2006. A transition board will direct TNI until elections of a new board can take place in 2007. Mr. Sotomayor noted that all committee members in attendance were interested in continuing to participate in the committee under the new organization.

DISPOSITION OF COMMENTS RECEIVED

The committee continued reviewing the comments received during the voting process considering the input received at the Kansas City Forum. For this discussion, the committee considered all comments received after comment number 17 and did not follow the order of comments discussed at the Kansas City meeting.

Mr. Sotomayor received a master document containing all comments received for ballots 1 and 11, the two related to On-Site Assessment. Rather than devising a separate document for tracking the disposition of the comments, Mr. Sotomayor will integrate the responses that the committee has formulated so far into the template provided by INELA staff. When the document is completed, the committee will have a final vote to release it as its response to comments document.

VOLUME 1, MODULE 2

Comment 18: Clause 6.2.2, NOTE

The commenter requested a clarifying change to indicate that assessment cancellation criteria applied to initial assessments.

Committee members in attendance concurred that the requested change made the language clearer and agreed to implement it.

Comment 19: Clauses 6.3, 7.1, 7.2.2, 7.4.2

The commenter requested that the requirements contained in these clauses be also consistent with those in V2 M3.

The committee noted that initially it had been tasked with separating the requirements of ISO 17011 into two modules. The committee believes that following the recommendation of the attendees at the Kansas City Forum, and comment number 24, combining the two modules would resolve the commenter's concerns.

Comment 20: Clause 6.3.1

The commenter requested a grammatical change substituting "the right" for "a right".

The committee concurred with the commenter's suggestion.

Comment 21: Clause 7.5.2

The commenter requested that the clause include a provision noting that all findings had to be referenced to the standard.

The committee agreed that all findings had to be confirmed and referenced to the standard. However, the committee felt that the definition of "finding" should indicate that all findings were referenced to a standard. The committee felt that the planned glossary for the standard would address the commenter's concerns and was reluctant to add a note under the clause to clarify for fear of creating an inconsistency with the definition of finding.

Comment 22: Clause 7.5.3, NOTE

The commenter requested that the timeframes for the responses to an on-site assessment report be included in the final report.

The committee agreed that the note could not be used to impose requirements and considered that V2 M3 specified a thirty day timeframe for a laboratory to issue a response to the on-site assessment report. The committee was reluctant to specify additional time frames or to make a requirement that these be included in the final report.

Comment 23: Clause 7.5.3

The commenter noted that the number of responses referenced in the note did not have a counterpart in V2M3.

The committee concluded that combining the two modules into one would resolve the commenter's concern.

Comment 24: General/Whole Document

The commenter requested deleting all reference to ISO 1701 in the module and instead asking laboratories that wanted additional information to purchase a copy of V2. The commenter also suggested restructuring the module and combining it with the Accreditation Process Module along the lines of the process a laboratory would follow from application, through assessment, to renewal.

At the Kansas City session, participants endorsed the idea of combining V1M2 and V2M3 into a single module in the Accreditation Body (AB) Volume (V2). Participants also agreed that crafting a guidance document, without ISO 17011 language, on the accreditation process for laboratories would be useful. The committee recommended following the commenter's suggestion.

Comment 25: Clause 1.0

The commenter requested removing the "Introduction" and "Scope" sections of the module because they did not contain requirements or added value to the standard.

The committee noted that since the standard was modeled after ISO 17011 and ISO 17011 included those sections, the module needed to retain them.

Comment 26: Entire Module

The commenter felt that on-site assessment requirements should not be in the laboratory volume.

The committee noted that it had been given clear direction at two previous meetings to produce two modules on on-site assessment, one from the laboratory perspective and the other from the AB perspective. During previous meetings the committee had discussed openly how it would take the material in ISO 17011 and divide it into two modules. However, the committee noted that INELA members now felt that having two modules could lead to inconsistencies and would make the standard more costly to laboratories. Combining the two modules in the laboratory volume, as now planned, should resolve the commenter's concerns.

Additional Comment in Non-Standard Format: Clause 7.5.3, NOTE

The commenter requested an editorial change to indicate that a laboratory that did not address findings within two responses could be denied their scope of accreditation.

The committee surmised that the commenter was trying to indicate that an AB had the option of not granting accreditation to a laboratory that had not addressed all findings of an initial assessment within two responses. The committee agreed with the principle and recommended this alternative language: "Customarily, a laboratory that does not address all findings satisfactorily within two responses is scheduled for a follow-up evaluation, is subject to administrative procedures that deny accreditation to the laboratory or that reduce its scope of accreditation."

NEXT STEPS AND CONCLUSION

The committee will meet again on November 21 at 12:00 Noon (ET). The meeting was adjourned at 1:00 PM (ET).

**PARTICIPANTS
INELA
ON-SITE ASSESSMENT COMMITTEE
NOVEMBER 1, 2006**

Member	Affiliation	Contact Information
	Wisconsin Department of Natural Resources	T: (608)266-9257 F: (608)266-5226
Donald Cassano		T: (518)485-557 E: elapman@optonline.net
Nilda Cox (Absent)	MWH Laboratories	T: (626) 836-1170 E: nilda.b.cox@us.mwhglobal.com
Margo Hunt	US EPA	T: (202)565-8531
Mark Mensik		T: (303)403-8752 E: markmensik@msn.com
Marlene Moore (Absent)	Advanced Systems, Inc.	T: (302)368-1211 F: (720)293-3706
Faust Parker	PBS&J Env. Toxicology Lab	T: (713)977-1500 F: (713)977-9233
Denise Rice	USEPA/OIG	T : (703)347-8748 E : rice.denise@epa.gov

INELA
ON-SITE ASSESSMENT COMMITTEE MEETING
NOVEMBER 1, 2006

ACTION ITEMS GENERATED AT THIS MEETING

Item No. Meeting Date	Action	Date to be Completed
1. 11/01/06	Mr. Sotomayor will integrate the responses the committee has formulated to the comments considered into the master document provided by INELA staff.	11/21/07

UNCOMPLETED ACTION ITEMS FROM PREVIOUS MEETINGS

Item No. Meeting Date	Action	Date to be Completed
2. 09/12/06	The committee will vote on the persuasiveness of all comments received on the draft interim standard.	11/22/06
1. 10/16/06	Mr. Sotomayor will provide preliminary language for a note addressing the timeliness of the appointment of a new assessment team when a raised objection is sustained.	11/01/06

INELA
On-Site Assessment Committee
November 1, 2006
12:00 – 1:25 am (ET)

AGENDA

- | | |
|-------|---|
| 12:00 | Attendance |
| 12:05 | Announcements, Update on Self-Sufficiency Efforts |
| 12:15 | Disposition of Comments Received |
| 1:20 | Next Steps |
| 1:25 | Adjournment |