# TNI PT Program Executive Committee Meeting Summary

## August 7, 2019

## 1. Roll call, approval of minutes and overview:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order at 1:30pm Eastern on August 7, 2019 in Jacksonville, FL. Attendance is recorded in Attachment A – there were 9 members present.

#### 2. Overview

Maria reviewed the introductory slides and the meeting agenda (see Attachment D).

- FoPT tables now have a tab that shows what has changed.
- Date of scoring change in the new Standard is 1/31/20.
- Will likely need data to address the PA ARA.

## 3. PTPA Reports

A copy of the PTPA reports presented can be found in Attachment E.

#### ANAB, ANSI National Accreditation Board – Melanie Ross

Melanie now works with the PT Providers. She is in business development and is also an assessor.

- There were no complaints.
- Reviewed failure rates at >10%
   Looked at Jan through June 2019
  - Reviewed study type/analyte combination
  - Analytes of concern
  - Historical study data (18 months)

There is no insight when one lab reports multiple methods and fails. Looked like high failure, but it was really only 2 labs.

• Data Issues:

- 1. Metals (SCM) pass rate less than 90% of study
- a. 15/18 analytes
- b. Requested investigation by the provider
- i. Blunder included in analysis.
- 2. Invalidated Study
- a. Pooled mean for Total Coliform, Fecal Coliform and E. coli exceeded upper limit of 200 cfu or mpn per 100 mL
- i. Replacement PT round opened (sent note to study participants)
- ii. They had a prep issue

## • Data Analysis

343 Fail Rate >10% 343 studies if N>20 there were 54 studies

This is similar to last year.

There were 5 analytes with issues

WPChem – Iron, TSS, TDS, TS and Turbidity Scattered throughout all the providers.

WSChem – Fluoride – looked at in more detail.

Andy - Perhaps there could be a concentration range issue? Matt did not think this was the case.

There was nothing that could be pointed to for the failures. 83%, 87%, 88%, 89% and 89% passed. Just fell under the 10% criteria. N>20

WPChem – Phosphorus 81, 84, 86, 88, 89%. N>20

Fail rates are consistent year over year – no appreciable trends noted.

## A2LA - Shawn Kassner

He looked at a year's worth of data for 4 PT Providers.

There were no complaints.

They found similar results to ANAB. No real changes.

They find issues with small data sets. It skews the data.

Soils -

1,2 -Dichlorobenzene, 2,4-D and Aroclor 1221 10.2 – 11.4% failure rate.

WP Organics – Benzo(a)anthracene was a new one (10.5%).

WS Inorganics – Cyanide was a surprise - 11.2%.

PTPAs don't get method data. This is something the PT Providers could provide.

Matt noted that ANAB works with smaller N's.

## 4. Subcommittee Reports

Report summaries are included in Attachment D.

## Analyte Breakdown Committee

Additional data is being requested.

## Chemistry FoPT Subcommittee

See slides in Attachment D.

Next meeting in September 2019.

## Microbiology FoPT Subcommittee

Michella Karapondo and Jennifer Best are working on a formal complaint regarding the NELAP AC's decision to not approve the new Microbiology FoPT table. They are questioning whether the PT Program is national. The NELAP AC questioned the need for separate listings of MPN-Multiple Tube and MPN-Multiple Well PTs. Originally these PTs were combined into one and now they are separate.

The NELAP AC did not accept it. They don't want method specific parameters.

Ilona noted that based on discussions with Jerry, the PTPEC needs to consider who its customers are. Is it a national program? This was the understanding when it was set-up.

Stacie Crandall raised concerns with the concept that the PT Program is national. She did not think other state needs should be considered and that the NELAP AC is the customer. What is the purpose of the PT Program? If we say it is a national program ... wouldn't there be issues where people will have to run state specific PTs?

Eric noted that there isn't anything in TNI that says there can't be a method specific FoPT analytes.

Matt – Do we have multiple well as a technology in the database? Dan Hickman – it is listed as a separate method. It's a technology defined parameter.

Need to possibly make the SOPs clearer.

Stacie asked if it is a training issue? Is there a need to do more training on microbiology?

Matt – Can the PTPEC develop technical guidance? Recommendation might be that technical guidance is needed? Standard fix? Or some sort of Guidance Document.

Eric - Maybe there should be a revised approach to keeping the AC up to date on the status of ARAs. Ilona commented that maybe a table in the monthly report with the list of the ARAs and status could be maintained. Maybe set-up a regular meeting with the NELAP AC? Stacie asked if a subcommittee is needed. A liaison to work with the NELAP AC.

Stacie - Does the AC need to approve the table? Does this need to be taken away?

If it is a national program, what does that mean? Most people think that it was being designed for the NELAP AC. Ilona commented that this will be looked at in Worksheet 11 (see below).

## FoPT Table Format Subcommittee

Craig Huff – Working with Rami and Dan Hickman. He sent three options to align the FoPT table with LAMS. Dan and Craig are aligned. Rami and the WET Expert Committee need to look at this and provide their input and opinion. One of the options is to just leave it alone.

Another piece of the puzzle is that WET PTs are really driven by the DMRQA program.

The PTPEC will still need to implement the tables the subcommittee has completed.

A review of LAMS needs to be done before an updated FoPT table is published.

## PT SOP Subcommittee

Eric noted that SOP 4-101 (FoPT Limits) could be done in September/October for PTPEC review. The Subcommittee will begin work on SOP 4-108 (Conflict of Interest) soon.

Shawn will be providing information on new PT Program SOPs needed based on the new Standard.

New Business –

## 5. Worksheet 11 – TNI Strategic Planning Meeting

Maria reviewed the Strategic Planning documents that were sent by Jerry Parr for the Strategic Planning meeting in October. This will be a face to face meeting between the TNI Board, Executive Committee Chairs and TNI Staff. The PTPEC needs to complete Worksheet 11. Maria started updating Worksheet 11 and shared the document on screen.

Attachment F includes a copy of the work done on Worksheet 11 during the meeting. The items highlighted yellow are bigger discussion topics that need to be discussed at the next PTPEC meeting. Red text was add/deleted/changes during the meeting. Track changes was left on.

Ilona will check with Jerry for the current number of accredited laboratories.

The complaint language needs to be looked at.

## 6. New Business.

None.

## 7. Action Items

The action items can be found in Attachment B. Updates were made directly into the table.

## 8. Next Meeting

The next meeting will be on 9/19/19, Thursday, at 1pm Eastern by teleconference. (Addition: Meeting time change to 11am Eastern.)

Action Items are included in Attachment B and Attachment C includes a listing of reminders.

## Attachment A

# Participants TNI Proficiency Testing Program Executive Committee

Members	Rep	Affiliation	Contact Information
Maria Friedman (2020)	AB	California Water Board	Maria.Friedman@waterboards.ca.gov
(Chair)			
Present			
Dixie Marlin (2021)	Other	Marlin Quality	marlinquality@gmail.com
(Vice-Chair)		Management, LLC	
Absent			
Ilona Taunton,		TNI	tauntoni@msn.com
Program Administrator			
Present			
Eric Smith (2020)	Lab	ALS Environmental	eric.smith@alsglobal.com
Present			
Carl Kircher (2021*)	AB	Florida Department of	Carl.Kircher@flhealth.gov
Absent		Health	
Andy Valkenburg (2021*)	LAB	Energy Laboratories	avalkenburg@energylab.com
Daniel			
Present Jennifer Duhon (2022)	Other	Millipore Sigma	jennifer.duhon@sial.com
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Present	4.5	ANIAR ANIOLAGO	
Matt Sica (2020)	AB	ANAB, ANSI-ASQ National Accreditation	msica@anab.org
Present		Board	
Patrick Garrity (2022)	AB	Kentucky DEP	patrick.garrity@ky.gov
Present			
Michella Karapondo (2022)	Other	USEPA	karapondo.michella@epa.gov
Present			
Fred Anderson (2020*)	Other	Advanced Analytical	Fred@advancedqc.com
		Solutions, LLC	
Present			
Jennifer Bordwell (2020*)	Lab	Upper Occoquan Service Authority	jennifer.bordwell@uosa.org
Present		,	
Scott Haas (2020*)	FSMO	Environmental Testing,	shaas@etilab.com
Present		Inc.	
Rachel Ellis (2022*)	AB	New Jersey DEP	rachel.ellis@dep.nj.gov
Absent			
ANSCIIL	1	1	

## **Attachment B**

## **Action Items – TNI PT Executive Committee**

	Action Iten		Date	Expected	Actual
	Action Item	Who	Added	Completion	Completion
295	Moved from Backburner: PTPA Evaluation Checklist needs to be updated prior to next round of evaluations. (Originally discussed 8/6/13)	Shawn Ilona	Adued	New Date: 5/31/19	In Progress (will use 2016 TNI Standards and current SSAS Standards)
349	Review LAMS/FoPT Table Differences document. Provide comments by email and next meeting.	ALL	4/20/17	4/25/17  2/28/18 – For WET?  June 2018 for all tables.  New target date: 4/30/19	In Progress WET is still being reviewed. Update 1/23/18: Subcommittee expects to have updated FoPT tables with CAS #'s and LAMS changes by 3/15/18. 2/22/19: Still in progress. 6/21/18: Still working with Rami. 3/21/19: Stacie asked if the group should be working on this while ELAB is working through this.
352	Moved from Backburner (originally discussed 2/20/14): When new limits are established for the FoPTs, what is considered to be a statistically significant change to the old rates? At what point is it appropriate to question	All	2/20/14	TBD (see #350)  350: Prepare formal request to SOP Subcommittee regarding updating	In Progress – Update of SOP 4- 101  6/21/18: Gil noted that this SOP will be worked on again at the next meeting. An expected

			Date	Expected	Actual
	Action Item	Who	Added	Completion	Completion
	new limits? This lends to the TSS discussion a few months ago.  Patrick commented that it would make sense to look at changes to pass/fail rates 6 months after new limits are effective. This possible addition to procedures should be evaluated when updating the limit acceptance SOP.			FoPT tables and applicable backburner items just moved to the Action Items table (#352, 353)	completion date will be given at July meeting.
361	Analyte Code changes needed in LAMS. (TKN)	Maria Dan Hickman	7/20/17	9/30/17	Still need to look into TKN issue.  2/22/18 – Maria will confirm.  10/18/18: Maria still needs to confirm. She just got something.
363	Discuss procedural change in how changes are made to LAMS. Consider notifying PTPEC before relevant changes are made and provide a summary of changes at some frequency.			1/31/17	Will talk to IT about getting this in an SOP. 12/21/17: Maria will follow-up on this. 3/20/18: Maria will check this week. 6/21/18 – still being worked on. 2/28/19 – Maria will follow-up.
368	Forward Jerry's question to Chemistry FoPT Subcommittee. (Analyte code change for the non- polar extractable materials.)	Maria	8/24/17	9/1/17	Maria will resend to Carl. 6/21/18 – Maria will send to Ilona. 10/18/18: Maria will send Dan's new info. 11/15/18 – Ilona received the info

	Action Item	Who	Date Added	Expected Completion	Actual Completion
	7 Tetion Teem	<b>*************************************</b>	Nucu	Competion	and needs to review it. (April PTPEC meeting.)
384	Meet with Dan Hickman to get Analyte Codes and then prepare final DRAFT of Micro DW and WW tables. Send to Jennifer for review.	Maria	4/19/18	5/15/18	Still in Progress
389	Present recommended LAMS updates to Dan Hickman.	Maria	5/17/18	5/20/18	FoPT format subcommittee provided recommendations.
397	Discuss Vol 3 and 4 implementation with NELAP AC.	Maria	10/18/18	11/15/18	In progress.
400	Follow-up on subcommittee reports from WET and the FoPT Table Format Subcommittee.	Maria	11/15/18	12/18/18	In Progress – combine with 349.
410	Review SOPs 4-102 and 7-101 to make sure there are no conflicts in the appeals process.	Eric	2/28/19	TBD	In Progress
411	Follow-up on two preliminary complaints on Hardness.	Maria	2/28/19	3/20/19	3/21/19: Did talk to lab, but waiting for follow-up. Still working with NELAP AC. Lab did not respond, so this is being closed. They need to file a formal complaint. Complete

	A T.	**/1	Date	Expected	Actual
412	Action Item  Maria will talk to Craig about holding off on more work on the WET FoPT Table until ELAB provides guidance.	Who Maria	Added 3/21/19	<b>Completion</b> 4/17/19	Completion
415	Send formal request to Chemistry FoPT Subcommittee to work on footnote issue raised by Shawn regarding Footnotes 5 and 6.	Maria	3/21/19	4/17/19	Complete, but will resend to Carl.
417	Discuss ARA data issue with the NELAP AC.	Maria	4/18/19	5/16/19	Pending
418	Discuss Analyte Code issue with Bill from New Hampshire.	Maria	4/18/19	5/16/19	
419	Prepare list of items needed in SOPs to accomplish Volume 3 and 4.	Maria, Shawn	5/16/19	TBD	
420	Let Jerry know about possible EPA issue with FoPT tables.	Ilona	5/16/19	6/19/19	
421	Send message to Committee to review information on data points vs participants and provide comment by email.	Maria	6/20/19	6/27/19	
422	Send Isomer ARA data to Carl so Chem FoPT Subcommittee can begin work on this.	Maria	6/20/19	7/17/19	

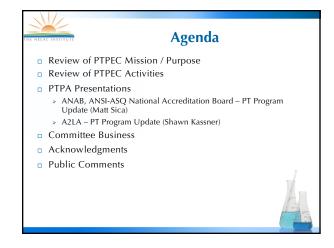
	Action Item	Who	Date Added	Expected Completion	Actual Completion
423	Prepare DRAFT equivalency letter to compare 2009 and 2016 to post on website for PT Provider customers.	Maria	7-18-19	TBD	
424	Complete vote on SOP 4-102.	Maria/Ilona	7-18-19	8-7-19	
425	Vote on SOP 4-107 by email.	Maria/Ilona	7-18-19	8-7-19	
426	Get total number of accredited labs from Jerry.	Ilona	8-7-19	9/18/19	
427	Prepare DRAFT of Worksheet 11 for September meeting review.	Maria	8-7-19	9/16/19	

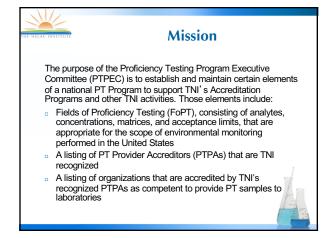
## **Attachment C**

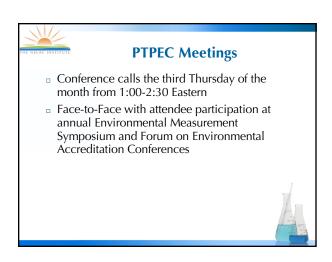
## **Backburner / Reminders – TNI PT Executive Committee**

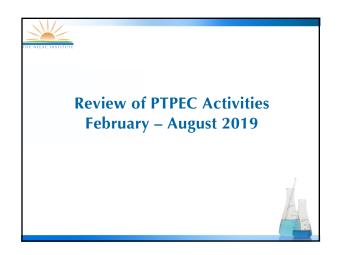
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	Item	Meeting Reference	Comments			
7	Add the Field PT Subcommittee to the limit update SOP during its next update.	3/4/10	In Progress			
11	Evaluate how labs are accredited for analytes that co-elute.	5-19-11				
13	Charter needs to be reviewed/updated in November.	Ongoing				
18	Shawn noted that PTPEC should have some specific measurements. This should be passed along to the PTP SOP Subcommittee. Nicole noted that we need to determine which items to measure.	6-29-17				

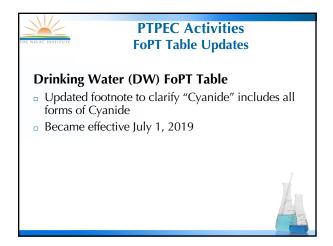














# PTPEC Activities 2016 TNI Standard Implementation

- Discussed implementation of Volume 3 with PT Providers, PTPAs, and members of NELAP AC
- Approved footnote to be included by PT Providers in PT Reports issued on or after January 31, 2020
  - Footnote to be included until PT Provider is accredited to 2016 TNI Standard



# PTPEC Activities 2016 TNI Standard Implementation

#### PT Report Footnote:

This report is scored by the criteria in the TNI V3 2016 standard instead of by the criteria in the TNI V3 2009 standard to which the Proficiency Testing Provider is accredited. This is a planned change and is endorsed by the TNI Proficiency Testing Program Executive Committee for transition to the TNI V3 2016 standard.





# PTPEC Activities Complaint Resolution Follow-Up

Analyte Breakdown Subcommittee Formed

- Response to issue of potential degradation of 4,4'-DDT into 4,4'-DDD affecting a lab's PT score
- Subcommittee to investigate and recommend technical solution to dilemma of analyte breakdown for 4,4'-DDT and Endrin
- Status: Historical PT data being sought from PT Providers



# PTPEC Activities Analyte Request Applications (ARAs)

ARA received from PA DEP in response to DoD ELAP memo regarding isomer group PTs

- Request to add individual compound isomers when current FoPT Table lists a "total"
- Example: Add m+p-Xylene and o-Xylene to DW and SCM tables
- Status: Assigned to Chemistry FoPT Subcommittee to evaluate ARA and return recommendation to PTPEC





# PTPEC Activities Analyte Request Applications (ARAs)

ARA received from TNI Whole Effluent Toxicity (WET) Expert Committee

- Request to collect and evaluate historical PT data for WET testing
- Status: PTPEC voted to not accept ARA.
  - As alternative, TNI approved PTPEC acting as intermediary to request data from PT Providers on behalf of WET Expert Committee
  - > Maria to talk to Rami re. data fields needed

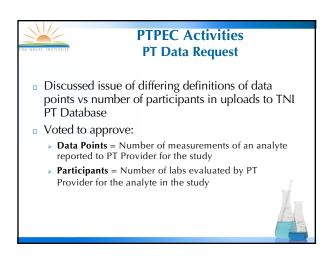


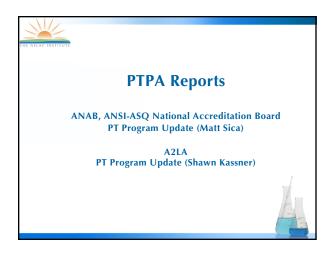


# PTPEC Activities Standard Operating Procedures

- Approved SOP 4-102 (Dispute Resolution Procedure)
- Approved SOP 4-107 (FoPT Table Management)
- Approved SOP 7-101 (TNI AB Evaluation and Recognition Procedure used by PTPEC and NEFAP EC)

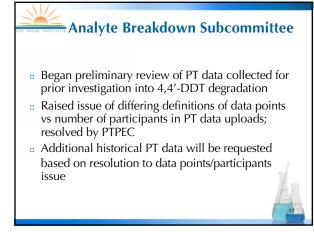


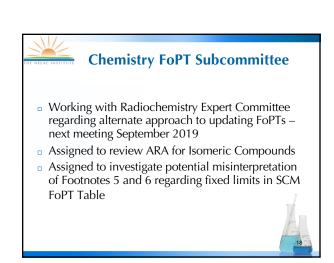




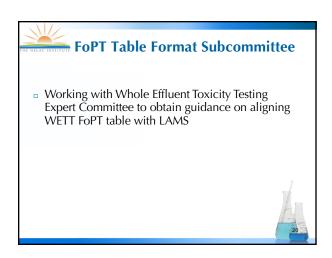


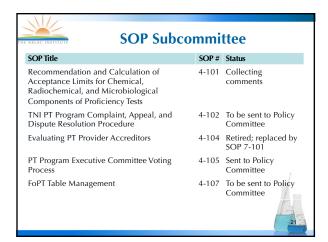


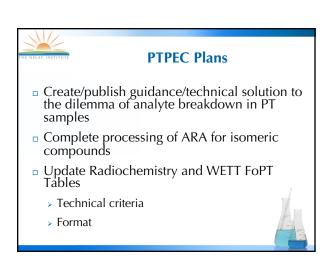


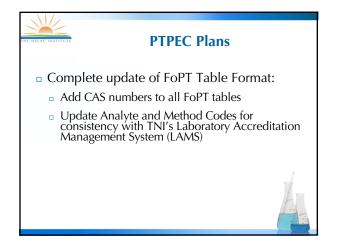


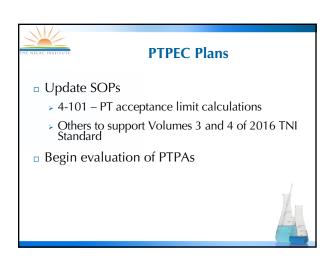














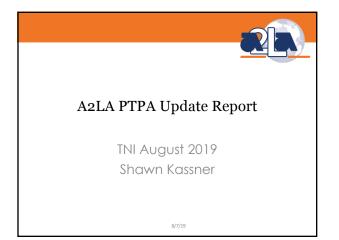












## PT Provider Status

- ERA Accredited status, Renewal assessment 09/30/2020
- Phenova Accredited status, Renewal assessment 09/30/2020
- New York State Department of Health Wadsworth Center – Accredited status, Renewal assessment 11/30/2020
- Advanced Analytical Accredited status, Renewal assessment 01/31/2020
- No complaints for any provider.



> 10% Fail Analytes

## Criteria to Determine

- Data was reviewed for the following criteria
  - Data flagged that contain n < 20</li>
  - Multiple providers with the same analyte
     10% fail rate
  - Identified analytes contain have on average 52% of the data where n < 20</li>
  - Historically repetitive.



## Data Challenges

- All PTPs have small data sets across analytes/studies types
- All small data sets with high failure rates due to:
  - Few laboratory failures
  - Multiple methods reported same data pts

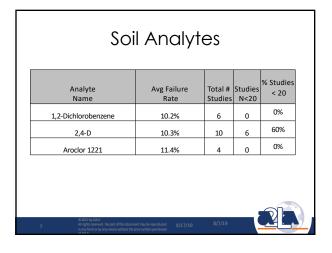


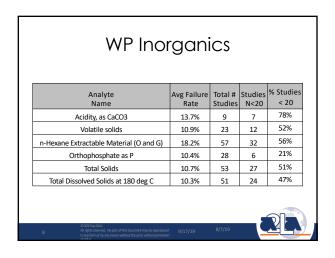
## Data Challenges

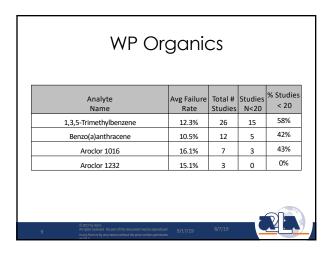
- What do these data sets represent?
  - 12 months of data were analyzed.
  - Each analyte is a study summary.
  - 42 analytes found to have failure rates > 10%.
  - 957 analytes total across the all of PTP studies.
  - Represents ~ 4.00 % of the PTP study data.
  - Historically, 1% 5% of the data PTPs report.

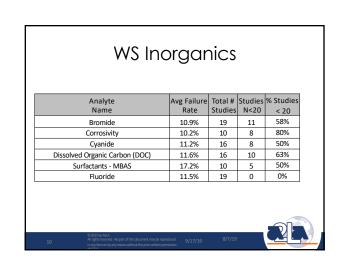
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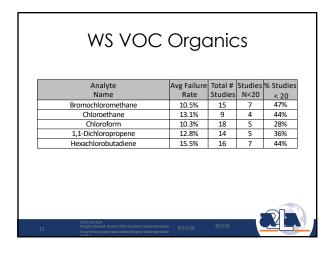
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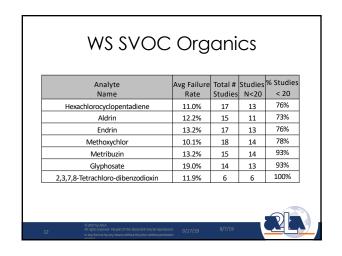












## **Data Conclusions**

- ~ 70% of the analytes consist of small data sets with a probable biases.
- All analytes have been presented historically as fail rates > 10%.
- No Issues with:
  - PT samples
  - Verification, homogeneity, stability data
- SOP Subcommittee considering adding this analysis as a trigger for FoPT review,

## Thank You!

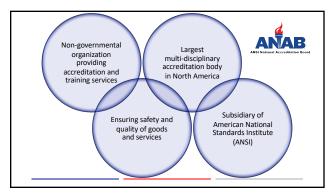
- Our customers, the A2LA accredited proficiency testing providers.
- Our staff, assessors, and the PTPEC and PTEC that support us in the continuous improvement of our accreditation program.

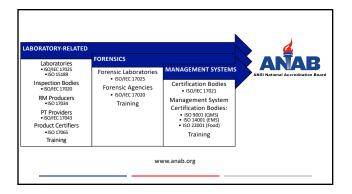


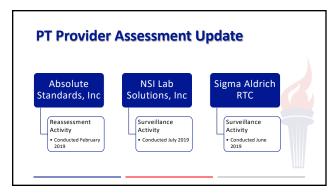


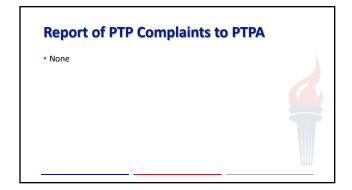


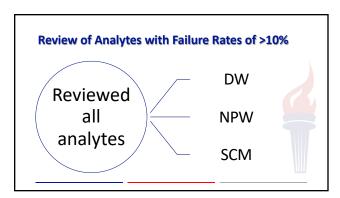


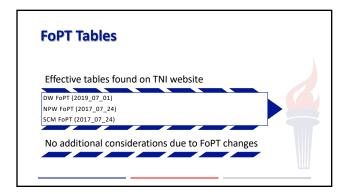


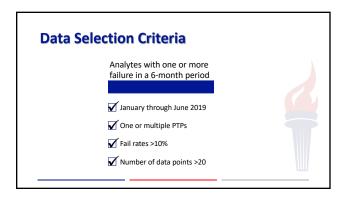


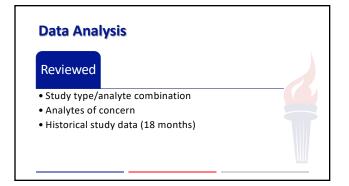


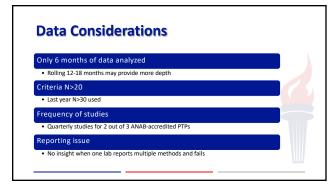


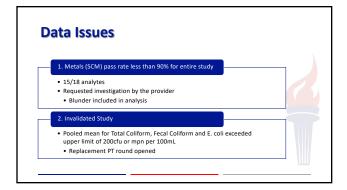


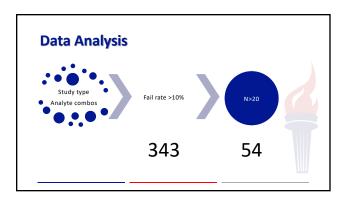


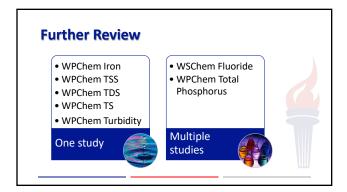


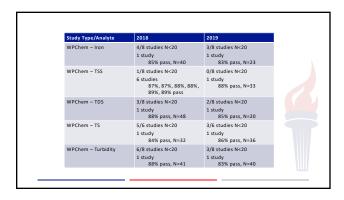


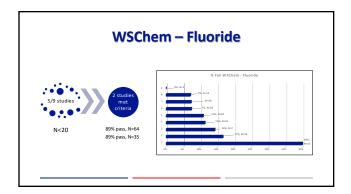


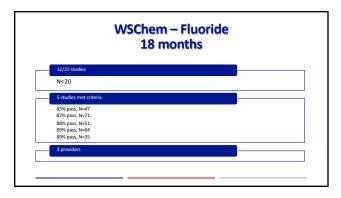


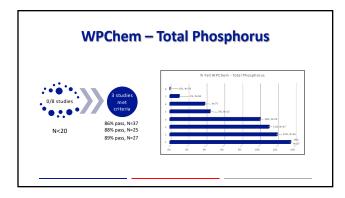


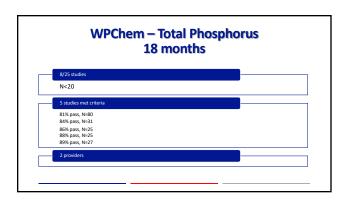


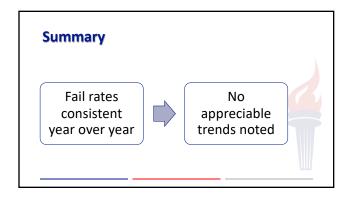














#### **Proficiency Testing (PT) Program**

Name of person(s) filling out this assessment:

Date:

Maria Friedman, Proficiency Testing Program Executive Committee (PTPEC) Chair Ilona Taunton, Program Administrator

Description of program service:

- Oversight and infrastructure for single-blind Proficiency Testing samples issued to accredited environmental testing laboratories, as used to determine laboratory accreditation status.
- The purpose of the Proficiency Testing Program Executive Committee (PTPEC) is to establish
  and maintain certain elements of a national PT Program to support TNI's Accreditation
  Programs (in TNI by-laws) and other TNI activities. Those elements include:
  - Fields of Proficiency Testing (FoPT), consisting of analytes, concentrations, matrices, and acceptance limits that are appropriate for the scope of environmental monitoring performed in the United States.
  - A listing of PT Provider Accreditors (PTPAs) that are TNI recognized approved.
  - A listing of organizations that are accredited recognized by TNI's recognized approved PTPAs as competent to provide PT samples to laboratories and Field Sampling and Measurement Organizations (FSMOs).

Units of service/number of people served including demographic information (if applicable)

 More than 3000 accredited environmental testing laboratories and FSMOs, 7 Proficiency Testing Providers, and 2 PT Provider Accreditors (PTPAs) (nationwide in the United States).

What is the need in the community that this program exists to meet?

- Assurance that single-blind proficiency samples meet applicable TNI Standards for environmental monitoring.
- Assurance that PT samples are formulated and scored to evaluate environmental laboratory and FSMO performance.

Who is the target audience that this program serves to reach? Who does the pt program serve?

- TNI-recognized Accreditation Bodies (NELAP, NEFAP, and NGAB). Instead of being this centric
  use general terms, e.g., use the term regulatory bodies.
- Accredited / certified environmental testing laboratories and FSMOs.
- PT Providers.
- PTPAs.
- Federal agencies (e.g., EPA).
- Non-NELAP states.

What impact does this program currently have, or intend to have, on addressing the need articulated above?

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Implement all policies and procedures necessary for the operation and continual improvement of a national PT Program - including FoPTs for various matrices and accreditation / certification Formatted: Highlight programs, Deleted: Periodically evaluate the effectiveness of the PT Program and the FoPTs. <a href="Ptpa reports">Ptpa reports</a> Continually evaluate and establish success measures and goals to target opportunities for improvement. Internal audit Implement an oversight program that ensures PT Providers are competent to operate environmental PT programs. - Receive and evaluate PTPA applications. Recognize organizations that meet the requirements of the TNI Standards to be designated Deleted: Approve Ensure that FoPTs are appropriate for their intended use. Collect and review PT data for the purpose of creating and maintaining FoPT tables for various matrices and programs. Formatted: Highlight What is the outcome(s) of this program's work? Review and endorse approval of Recognition Committee recommendations applications from for applicant PTPAs to become recognized. Deleted: prospective Periodic review of all PTPAs to ensure their conformance to the requirements established by the TNI standard and PTPEC policies. During evaluation Adoption and implementation of consensus standards. Support the PT Expert Committee in addressing Standard Interpretation Requests (SIRs), as needed. Develop and update FoPT Tables, as needed. Adopt policies for the implementation of the program <u>Develop and Adopt TNI policies and procedures for use within the program.</u> Deleted: ion of Respond to complaints related to the program **Deleted:** Response to complaints about the accreditation Training programs relevant to the needs of the stakeholder community. Evaluation of the effectiveness of the PT program. Measures of Success check all against charter What evidence do you have to show that this program is having the impact you want it to have? How do we know we are being successful? Effective resolution of complaints regarding the PT program. Deleted: Minimal procedures are adequate for scoring, producing, and validating PT proficiency samples. Deleted: Minimal need to change Availability of organizations to evaluate and accredit PT Providers. Deleted: Effective gauge of laboratory quality based on acceptable performance of PT samples. Deleted: <#>Willingness of PT Providers to produce samples and to score laboratory results according to the requirements specified in the applicable TNI Standards. Addition of fopts Continued recognition of ptpas Adequate resources to supply pts to community Manage stakeholders

What are the greatest strengths of this program?

• PT Providers willing to comply voluntarily with the relevant standards.

- Involvement of stakehlders willing to serve on the PTPEC and relevant subcommittees.
- TNI support (staff, website, WebEx, etc.).
- Earned respect and confidence from stakeholders.
- Consistent product as delivered by two ptpa reports
- Involvement of stakeholders

What are the greatest weaknesses of this program?

- FoPT tables TNI-makes available for are free to the public at large and therefore do not eannet be used to generate revenue.
- Volunteer memberswith significant time constraints.
- Unclear processes for stakeholder approvals
- Unclear mission

What are the trends in the environment—political, social, economic, technological, demographic, legal forces—that are or will be impacting this program in the future: trends either potentially moving the program forward (opportunities) or holding it back (threats)?

- The increasing focus on Per- and Polyfluoroalkyl Substances (PFAS), which are not currently included in FoPT tables, may lead the PTPEC to work toward adding PFAS to FoPTs
- Shifting priorities from Federal government can affect ability of EPA to support PT initiatives
- The emergence of Non-Governmental Accreditation Bodies (NGABs) that provide laboratory
  accreditation to the TNI Standard could provide an opportunity for the PT Program to be
  extended to states that have not joined TNI.
- Likewise, NGABs could also diminish the need for the PT Program due to their offering
  accreditation for multiple, sometimes overlapping, standards (e.g., ISO 17011, ISO 17025, ISO
  17043, AIHA, and TNI). States could choose to recognize ISO accreditation instead of or in
  addition to TNI.

How could we improve the cost effectiveness of this program?

- Continue to recruit competent volunteers for evaluation of PTPAs.
- Collaborate with NEFAP on the combined evaluation of PTPAs per SOP 7-101.

How could we improve the quality of this program? How could we improve our ability to deliver this product/provide this service? If we were to reinvent this program, what changes would we make in how the service/product is delivered?

- A documented and streamlined procedure for the transfer of data from PT Providers and PTPAs
  to the PTPEC is needed, for the purposes of evaluation of FoPT Table criteria and to address
  complaints. It shouldn't be a difficult process to obtain recent PT Study data from multiple PT
  Providers and PTPAs.
- More timely update of FoPT tables.

How might we better market this program (i.e., increase the public's awareness of this program)?

 Participation in EPA's DMR-QA Program is required in at least 36 states. That program utilizes PT Providers accredited by TNI-approved PTPAs, and FoPT Tables approved by the PTPEC and by TNI ABs, and yet the EPA's DMR-QA website does not mention TNI at all, but merely **Deleted:** Experts and regulatory officials

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**Deleted:** <#>Not having a clear plan on how to reach out to non-NELAP stakeholders who are already using TNI resources like the standards and FoPT Tables.

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**Deleted:** <#>Committee turnaround time on decision-making or incoming requests too long (on average >6 months).¶

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