TNI PT Program Executive Committee Meeting Summary

September 19, 2019

1. Roll call, approval of minutes and overview:

Chair, Maria Friedman, called the TNI PT Program Executive Committee (PTPEC) meeting to order at 11am Eastern on September 19, 2019 by teleconference. Attendance is recorded in Attachment A – there were 8 members present. Associate Members present: Jennifer Best (at 11:21am Eastern), Craig Huff, Shawn Kassner (until 12pm Eastern), Tim Miller, Sennett Kim, and Nicole Cairns.

The July and August meeting minutes were distributed by email for review. A motion was made by Fred to accept the July 18, 2019 and August 7, 2019 minutes as written. The motion was seconded by Jennifer Duhon and unanimously voted For by the committee members on the call. Eric joined into the meeting at 11:30am and provided his vote to approve both sets of minutes. Scott Haas provided his vote by email. The minutes were approved for posting on the website.

Maria confirmed that meeting participants received the agenda and supporting materials sent 9-18-19.

2. Chair Update

- SOP 4-102. Comment period on email ended yesterday. It is now ready to vote. A motion was made by Fred to approve SOP 4-102 as sent by Maria on 9-18-19. The motion was seconded by Jennifer Bordwell and unanimously approved.
- MPN ARA. This is still in progress. Jennifer Best spoke with Aaren Alger and they may have worked through the issues, but Maria does not have any details at this time (see update below under Committee reports).
- The tables Craig Huff (Chair, FoPT Table Format Subcommittee) has been working on have been included with the Agenda information. This may not be discussed today, but Maria wanted to draw attention to them. Ilona noted that Jerry Parr would like to see the format currently posted corrected title should not be NELAC and the title should be similar to the naming on the tab to open the FoPT table.
- WET Expert. We need to help them get the data they need. Craig is still working on their table. Jerry Parr OK'd helping.

3. Old Business

<u>Implementation of Volume 3</u>

Maria prepared a DRAFT memo she sent with the Agenda (Attachment D).

The date in the second paragraph needs to be looked at. Will this work for ANAB too? January 31, 2021.

Shawn noted that the new date should be fine. Shouldn't there be a statement of equivalency. He would like to see a statement that they are deemed equivalent. Look at the comparison sent by Ilona or ask the PT Expert Committee for this information. The intent is to make it clear that there is no advantage to being accredited to 2009 vs 2016. The accreditations are deemed equivalent between the ABs. The wording needs to be worked on and discussed. Maria asked that everyone send her recommended language by email.

The lab implementation and PT Provider implementation dates for the reporting piece are the same. The lab module specifically tells the lab how to report. If the PT Providers aren't doing the same thing, it would be a problem. This is why this specific section is being implemented on the same date.

Strategic Planning Meeting – Worksheet 11

Maria continued reviewing Worksheet 11 with the changes discussed during the Jacksonville meeting (see Attachment in 8/7/19 Minutes).

Each section was reviewed, and changes were made to the document using Webex. Maria will finish the document and distribute for email review. The final version will be included in Attachment E.

4. Subcommittee Reports

Microbiology FoPT Subcommittee

Jennifer noted that she discussed the ARA issue with Aaren (Chair, NELAP AC) in Jacksonville. The NELAP AC originally questioned the need for separate listings of MPN-Multiple Tube and MPN-Multiple Well PTs. These PTs were combined into one and now they are separate in the new table. Jennifer will be attending an upcoming NELAP AC meeting to discuss this further. There appears to be some misunderstandings that need to be worked through. She will share the Subcommittee's rational and answer questions.

Michella and Jennifer have not yet filed the complaint discussed previously. They will wait to decide what to do after the NELAP AC meeting. They will be meeting in October.

PT SOP Subcommittee

SOP 4-102 – Need to update the SOP number to Rev 4 and add what changed before it goes to Policy. This is part of the normal administrative preparation before it goes to Policy. Eric will provide Ilona with the list of changes for Section 10.

SOP 4-101 - Progress being made.

SOP 4-108 - COI SOP. Eric will be sending this before the next PTPEC meeting.

SOP 4-107 - Reviewed Policy comments. They will be finalizing changes at their next meeting. If it is approved ... it will be sent to PTPEC for final review and approval.

SOP 4-105 – Board comments need to be addressed.

FoPT Table Format Subcommittee

Nothing new. The PTPEC will start reviewing the table updates for finalization.

Analyte Breakdown Committee

The PT Providers have been requested to provide the data needed by the end of September.

5. New Business.

None.

6. Action Items

The action items can be found in Attachment B.

7. Next Meeting

The next meeting will be on 10/31/19, Thursday, at 1pm Eastern by teleconference.

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

The meeting was adjourned at 12:33 (Motion – Eric Second – Andy Unanimously approved.

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 (11:30am)			
Carl Kircher (2021*)	AB	Florida Department of	Carl.Kircher@flhealth.gov
Absent		Health	
Andy Valkenburg (2021*)	LAB	Energy Laboratories	avalkenburg@energylab.com
Present Jennifer Duhon (2022)	Other	Millipore Sigma	jennifer.duhon@sial.com
definition button (2022)	Otrici	Williporc Olgina	Jerniner.danon@siai.com
Present			
Matt Sica (2020)	AB	ANAB, ANSI-ASQ National Accreditation	msica@anab.org
Absent		Board	
Patrick Garrity (2022)	AB	Kentucky DEP	patrick.garrity@ky.gov
Present			
Michella Karapondo (2022)	Other	USEPA	karapondo.michella@epa.gov
Absent			
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
Absent		Inc.	
Rachel Ellis (2022*)	AB	New Jersey DEP	rachel.ellis@dep.nj.gov
Dwagant			
Present	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
	TREMON TEEM	***************************************	Tuucu	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
412	Maria will talk to Craig about holding off on more work on the WET FoPT Table until ELAB provides guidance.	Maria	3/21/19	4/17/19	
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.

	Action Item	Who	Date Added	Expected Completion	Actual Completion
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	
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	

	Action Item	Who	Date Added	Expected Completion	Actual Completion
427	Prepare DRAFT of Worksheet 11 for September meeting review.	Maria	8-7-19	9/16/19	
428	Send Worksheet 11 out for final committee review.	Maria	9-19-19	9/27/19	
429	PT Provider Memo – send comments to Maria and ideas for updated language.	All	9-19-19	9/26/19	

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				

Attachment D.

Memorandum

Date: September 19, 2019

To: TNI Accredited PT Providers and PT Provider Accreditors

From: TNI Proficiency Testing Program Executive Committee (PTPEC)

Regarding: Implementation of the 2016 TNI Standard Volume 3

As previously announced in a memorandum from PTPEC dated 4-24-2019, all TNI PT Providers shall implement Section 5.9 of Volume 3 of the 2016 TNI Standard on the implementation date set by the NELAP Accreditation Council for Volume 1, **January 31, 2020**. The purpose of today's memorandum is to address the implementation schedule for the remainder of Volume 3 of the 2016 TNI Standard.

TNI PT Providers will be assessed and accredited to the 2016 TNI Standard Volume 3 according to a schedule arranged between the PT Provider and their PT Provider Accreditor. Such accreditation must become effective no later than December 31, 2020.

Regardless of the date that a PT Provider becomes accredited to the 2016 TNI Standard Volume 3, in no event shall a PT Provider report PT results according to Section 5.9 of Volume 3 of the 2016 TNI Standard <u>prior</u> to January 31, 2020.

Proficiency Testing (PT) Program

Name of person(s) filling out this assessment:

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

Date: 10-7-2019

Description of program service:

- Oversight and infrastructure for single-blind Proficiency Testing samples issued to laboratories seeking initial or continuing accreditation, 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 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.
 - A listing of PT Provider Accreditors (PTPAs) that are TNI recognized.
 - A listing of organizations that are accredited by TNI's recognized PTPAs as competent to provide PT samples to laboratories and Field Sampling and Measurement Organizations (FSMOs).
 - Review of changes to the Stationary Source Audit Sample (SSAS) Table.

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

 More than 1400 accredited environmental testing laboratories and FSMOs, 7 Proficiency Testing Providers, and 2 PT Provider Accreditors (PTPAs)

2018 Budget – Jerry will Provide

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).
- Accredited/certified environmental testing laboratories and FSMOs.
- PT Providers.
- PTPAs.

- Federal agencies (e.g., EPA).
- Non-NELAP regulatory bodies.

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

- 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 programs
 - Periodically evaluate the effectiveness of the PT Program and the FoPTs.
 - Continually evaluate and establish success measures and goals to target opportunities for improvement.
- Implement an oversight program that verifies PT Providers are competent to operate environmental PT programs and the SSAS program, as applicable.
 - Receive and evaluate PTPA applications.
 - Recognize organizations that meet the requirements of the TNI Standards to be designated as PTPAs.
- Verify 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.

What is the outcome(s) of this program's work?

- Review and endorse Recognition Committee recommendations for applicant PTPAs to become recognized.
- Periodic review of PTPAs to verify their conformance to the requirements established by the TNI standard and PTPEC policies.
- 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.
- Develop and adopt TNI policies and procedures for use within the program.
- Respond to complaints related to the program.
- Provide training programs relevant to the needs of the stakeholder community.
- Evaluation of the effectiveness of the program.

Measures of Success

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 program.
- Procedures are adequate for scoring, producing, and validating PT samples.
- Availability of organizations to evaluate and accredit PT Providers.
- Effective gauge of laboratory quality based on acceptable performance of PT samples.
- Addition of FoPTs.
- Continued recognition of PTPAs.
- Adequate resources to supply PTs to community.

- Manage stakeholders.
- Complete Analyte Request Applications (ARAs).

What are the greatest strengths of this program?

- PT Providers willing to comply voluntarily with the relevant standards.
- Involvement of stakeholders 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 are free to the public at large and therefore do not generate revenue.
- Volunteer members with significant time constraints.
- Unclear processes for stakeholder approvals.
- Unclear mission related to national program.
- If national program, it is not clear how requirements that the NELAP AC disagrees with should be posted for use by other states.

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 – have general guidance.
- 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/IEC 17011, ISO/IEC 17025, ISO/IEC 17043, AIHA, and TNI). States could choose to recognize ISO/IEC accreditation instead of or in addition to TNI.

How could we improve the cost effectiveness of this program?

- Collaborate with NEFAP on the combined evaluation of PTPAs per SOP 7-101.
- Change how often we review and update the FoPT limits. Significant changes have been made to SOP 4-107.

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?

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 links to the TNI website's list of approved PT Providers. Greater
 exposure of TNI's indirect involvement in DMR-QA could be beneficial.
- Work with EPA to develop needed FoPT Tables.
- FoPTs have fewer analytes than what states use work with those states to add FoPTs.
- Expansion of the scope of TNI's participation in various fields of the environmental industry (e.g., NEFAP) provides for increased marketing potential.

Is there potential for (starting/increasing/improving) collaboration? How? With whom? Within the organization?

- EPA provide legislative support.
- Other accrediting agencies like AIHA and CALA.

Outside of the organization? In what ways? With whom? Why?

Same as above.

If the budget for this program were suddenly cut, what would you recommend we do?

- Immediately identify substitute sources of funding (e.g., grants).
- Identify the minimum funding needed to sustain the PT Program.
- Administrative support could be reduced by committee taking on more of these responsibilities.
- Consider increase in fees to participate in the program (e.g., PTPA, PT Providers, membership fees).
- Consider fee-based trainings (e.g., lab-specific PT Program, general topics in TNI, etc.).
- Consider fee-based access to TNI materials (e.g., FoPT Tables, databases, etc.).

If the budget for this program was suddenly increased, what would you recommend we do?

- Increase TNI involvement in international ISO/IEC standard setting activities.
- Sponsor PT studies and analyses of emerging analytes of concern to establish new FoPTs.

What is the unrealized potential for this program? What would it take to reach that potential?

 Adoption of the program in every jurisdiction of the United States: a true National Program. The work products of the PT Program, FoPT Tables and a list of accredited PT Providers, are already used by many Regulatory Agencies beyond those represented by TNI ABs. These "outside" agencies are consumers of the PT Program. TNI should seek ways to encourage participation by these agencies and explore options to receive funding for these services. Collaborate with NVLAP, AIHA, and AOAC.

Competitive Analysis of This Program

Program fit: How is this program congruent with the overall purpose and mission of our organization?

 The PT Program is an integral part of the TNI mission, since laboratory and FSMO participation and satisfactory performance in analyzing single-blind proficiency test samples are important components of accreditation.

How does/could this program draw on existing skills in the organization and share resources/to coordinate activities with other programs?

 Make it a requirement that at least one member from any relevant TNI Program (e.g., NELAP Accreditation Council, NEFAP, NGAB and SSAS) participates in PTPEC teleconferences or meetings, when issues related to FoPT Tables or the SSAS Table are the subject of discussion.

Ability to Attract Resources: Does this program have the potential to attract resources and enhance existing programs?

Note: The ability to attract resources deals with issues of market demand; stable funding or ability to provide current and future support; appeals to volunteers; measurable, reportable program results; complements other programs; low exit barriers—ability to discontinue program or abandon past commitment without alienating supporters.

Yes

Why did you give the yes or no response that you did? Where do you think the continued resources will come from? Where do you think are the untapped opportunities for additional resources?

• Many personnel from laboratory accreditation programs, environmental laboratories, federal and state regulatory organizations, PT Providers, and other support organizations show dedication and commitment to the quality and value of defensible sampling and testing to produce environmental test results that are fit for their intended use. PT Providers are also committed to providing a quality product. The continued resources will come from these organizations. A plan must be devised to reach out to non-NELAP stakeholders who are already using TNI resources like the standards and FoPT Tables.

Competitive Position: Are there many groups, or few groups, providing similar services in the community? Who else is doing the same or similar work to address this need in our geographic area?

Note: A program with a strong competitive position is one that meets the following criteria: good logistical delivery system; large reservoir of client, community, or support group loyalty; past success in securing funding; strong potential to raise funds; superior track record/image of service delivery; large market share of the target clientele; better-quality service/product/service delivery than competitors; superior organization, management, and technical skills; cost-effective delivery of service.)

Few Groups

List names of groups here:

- American Industrial Hygiene Association (AIHA)
- Canadian Association for Laboratory Accreditation (CALA)
- Individual state laboratory certification programs that have not subscribed to the national laboratory accreditation effort

Do you think your program is in a strong competitive position in relation to the above groups?

Yes

Why or why not?

 The existing environmental laboratory accreditation standards have been developed over many years of effort with input from all stakeholder groups. ABs have also gained experience in implementing the standards for accreditation, on-site assessments, and PT requirements.

Why do you think it is important for our organization to address this need (as opposed to another organization)? What is your program's competitive advantage? What makes your program unique in comparison to the competition?

 The organization provides an excellent forum for all industry parties (e.g., state laboratory certification programs, laboratories, FSMOs, PT Providers, data users, and regulatory compliance officials) to be able to actively participate in developing mutually beneficial national environmental laboratory and FSMO standards and providing a level of uniformity and consistency across these stakeholders.

Suggested future growth strategy for this program

Increase the number of States active in the program.

Why this strategy? Include the implications if we were to ignore this strategy.

• TNI provides for more widespread acceptance and uniform implementation of environmental sampling and testing standards that were formulated by consensus. To ignore this strategy would significantly increase the amount of redundancy, conflicting requirements, and onerous requirements imposed on environmental laboratories and FSMOs. Accreditation costs would increase. The number of different PT studies a laboratory or an FSMO would have to participate in would also increase for those organizations accredited in multiple states.

What impact would this growth strategy have on our resources (staff time and other expenditures) and revenues?

• With effective planned growth, revenues should increase as more members join TNI and that revenue should be sufficient to cover anticipated increases in overhead expenses.