



<b>Policy TITLE</b>	<b>Mutual Recognition Policy for NELAP-Recognized Accreditation Bodies</b>
<b>Policy NO.</b>	<b>3-100</b>
<b>REVISION NO:</b>	<b>2.0</b>
<b>Program</b>	<b>NELAP</b>

<b>Committee Approval</b>	<i>2/7/2022</i>
<b>Policy Committee Review</b>	<i>4/19/2024</i>
<b>TNI Board of Directors Endorsement</b>	<i>NA (5/8/2024)</i>
<b>Effective Date</b>	<i>2/7/2022</i>

## I. PURPOSE AND APPLICABILITY

The principle of recognition is a fundamental concept in a national environmental laboratory accreditation program. This policy establishes the principle of recognition as an essential element of and condition for participation in the National Environmental Laboratory Accreditation Program (NELAP).

## II. SUMMARY

The policy establishes the responsibilities of primary and secondary NELAP-recognized accreditation bodies as they relate to mutual recognition, describes circumstances when the policy does not apply, and prescribes how disputes relating to the policy between or among accreditation bodies are to be resolved.

## III. DEFINITIONS

**Accreditation Body (AB)** – The organization having responsibility and accountability for accreditation.

**National Environmental Laboratory Accreditation Program (NELAP)** – A core TNI program that is implemented by governmental agencies recognized as NELAP ABs to accredit laboratories.

**NELAP Accreditation Council (NELAP AC)** – The body within TNI’s NELAP program comprised of representatives of each NELAP AB and holding final authority for implementation of the program for the accreditation of environmental laboratories.

**Conformity Assessment Body (CAB)** – Body that performs conformity assessment services and that can be the object of accreditation. (NOTE: Essentially, this term refers to the laboratories being accredited.)

**Mutual Recognition** – The acceptance by an accreditation body of an environmental laboratory accreditation issued by a primary accreditation body without any other duplicative actions to determine the laboratory’s conformity to the Standards. For the purposes of accreditation, mutual recognition does not mean automatic

Mutual Recognition Policy for Accreditation Bodies

---

accreditation by a secondary accreditation body or exemption from complying with the administrative processes of a secondary accreditation body.

**Primary Accreditation Body** – The accreditation body responsible for assessing a laboratory's total quality system, on-site assessment, PT performance and grants primary fields of accreditation.

**Secondary Accreditation Body** – An accreditation body that grants accreditation for a field of accreditation based upon the recognition of accreditation from a Primary Accreditation Body for the same field of accreditation.

**Supplemental Primary Accreditation Body** – The accreditation body that assesses PT performance and grants primary fields of accreditation for supplemental fields of accreditation outside the primary accreditation body's fields of recognition.

**TNI Standard** – A document that has been developed and established within the consensus principles of TNI and that meets the approval requirements of TNI procedures, and has been approved by the Expert Committee. While the TNI Standards are composed of volumes and modules, reference to the standard in this SOP may relate to a volume, a module or a section of a volume or module depending on the activities of the Expert Committee.

#### IV. RESPONSIBILITIES OF A PRIMARY ACCREDITATION BODY

A primary accreditation body:

1. Ensures that Conformity Assessment Bodies (CAB) meet applicable requirements contained in the Standards;
2. Is responsible for receiving, evaluating and making accreditation decisions regarding granting, denying, revoking, and suspending interim or full accreditation to applicant laboratory organizations;
3. Receives and evaluates applications from laboratories that are physically located within the AB's borders for those fields of accreditation for which the NELAP AB offers NELAP accreditation, meaning that the laboratory's "home-state" is its NELAP-recognized AB;
4. May waive the requirement for the laboratory to seek primary accreditation from its home-state in cases where the laboratory applying for primary accreditation from its home-state would create a real or perceived conflict of interest. (For instance, an AB may grant a waiver to the state's primary laboratory from having to apply to its own state agency for accreditation);
5. May choose to receive applications from laboratories that are physically located outside of the AB's borders when the applicant laboratory's home-state is not a NELAP-recognized AB or when the home-state AB does not offer Primary NELAP accreditation for one or more fields of testing. Primary ABs are not required by this policy to accept applications from out-of-state laboratories seeking primary accreditation.
6. Is responsible for assisting secondary accreditation bodies, if requested, with the verification of accreditations issued by the primary accreditation body;
7. Must maintain conformance to the Standards and the policies, procedures, resolutions, and interpretations pertaining to accreditation bodies approved by the NELAP Accreditation Council.

#### V. RESPONSIBILITIES OF A SECONDARY ACCREDITATION BODY

1. Except as specified in this policy, an accreditation body agrees as a condition for participation in the NELAP to:
  - a) recognize environmental laboratory accreditations issued by primary NELAP accreditation bodies without any other duplicative actions to determine the laboratory's conformity to the

Mutual Recognition Policy for Accreditation Bodies

---

Standards. The secondary AB may require copies of existing documentation and may work in concert with the primary AB in the event that any investigative actions are needed. The AB offering secondary accreditation to a laboratory should not impose additional requirements concerning on-site assessments, quality assurance, proficiency testing, or other matters relating to conformance to the Standards, but may request copies of the primary AB's on-site assessment report and a copy of the certificate of accreditation.

- b) maintain conformance to the Standards and the policies, procedures, resolutions, and interpretations pertaining to accreditation bodies approved by the NELAP Accreditation Council.
2. Mutual Recognition of an accreditation issued by a primary accreditation body:
    - a) is limited to the fields of accreditation (methods and analytes) included in the primary accreditation at any point in time, and
    - b) does not prevent a secondary accreditation body from verifying the accreditation with the primary accreditation body or requiring a laboratory to adhere to applicable laws and rules and normal administrative process, such as submitting applications and paying fees.

## VI. EXCEPTIONS

A secondary accreditation body does not have to recognize a primary accreditation or grant secondary accreditation if a law, rule, or decision resulting from a legal action precludes or has the effect of precluding the secondary accreditation body from granting accreditation in whole or in part to a laboratory.

## VII. REQUIREMENTS FOR UPLOADING RECORDS TO THE LABORATORY ACCREDITATION SYSTEM

1. The Primary Accreditation Body is responsible for uploading the demographics for all primary labs at least once every 3 months and uploading all primary accreditation records at least once per month.
2. The Supplemental Accreditation Body is responsible for uploading all supplemental primary accreditation records at least once per month,
3. The Secondary Accreditation Body is responsible for uploading all secondary accreditation records at least once per month,
4. The schedule for updates would include submitting records even if there were no changes to the database.
5. Substantial changes should be uploaded as soon as practicable.

## VIII. DISPUTES

Disputes between or among NELAP accreditation bodies relating to this policy must be resolved according to the appropriate TNI policy or procedure. Disputes between a lab and an AB must be resolved according to the AB's policies and are beyond the scope of this policy.

## IX. DEPARTURE OF AN AB FROM THE NELAP AND THE ACCREDITATION COUNCIL

If a NELAP AB determines to no longer offer primary accreditation under the auspices of NELAP, the NELAP AC shall consider how best to address the specifics of the withdrawal on a case-by-case basis with all efforts being made to avoid interruption of the accreditation status of affected CABs. The departing AB is expected to comply with the following items:

Upon publication of each stage or phase of a regulation change that affects the NELAP AB's status, the withdrawing AB will notify the NELAP AC Chair, the NELAP Program Administrator and the TNI Executive

Mutual Recognition Policy for Accreditation Bodies

---

Director that such a regulatory notice was published, and provide a URL link or file copy for the published regulatory notice.

When notifying its CABs about the impending withdrawal, the AB will inform them that they should apply to a different NELAP AB within two months of that notification. While other NELAP ABs may choose to continue recognizing any affected CAB's Certificate of Accreditation for secondary accreditation purposes until the certificate expires, this extension period is solely the decision of the secondary AB and beyond the purview of the NELAP AC. Each NELAP AB's state regulations and program policies will guide the AB's decision.

**Policy Approved Changes**

Revision No.	Date	Description of Change
0	1/4/2010	
0.1	3/10/2012	Updated format.
0.2	11/30/2015	Minor editorial revisions prior to presentation to NELAP AC for first vote (documentation of initial approval cannot be located)
0.3	11/30/2015	Revised to address Policy Committee comments upon its review
1.0	9/9/2020	Revised to address handling Certificates of Accreditation upon departure of NELAP AB
2.0	2/7/2022	Added Section VII to require reporting of both primary and secondary accreditations into LAMS