

Accreditation Body Task Force: Findings and Recommendations

Judy Duncan, Chair

Accreditation Body Task Force Mission

- To identify means for TNI to assist ABs to eliminate bottlenecks and to deal with financial and personnel strains while promoting continuation of nationally recognized full accreditation services to laboratories.**

Members

- Steve Arms (ex officio) NELAP AB
- Susan Boutros Small lab
- Lynn Bradley Other
- Bob DiRienzo Lab
- Judy Duncan, Chair State non-NELAP AB
- Jack Farrell Other
- John Gumper Other
- Judy Morgan Lab
- Matt Sica State non-NELAP AB
- Alfredo Sotomayor State non-NELAP AB
- Dave Speis Lab
- Carol Batterton TNI staff support
- Jerry Parr TNI staff support

Key Finding

- **One size solutions will not fit for all states.**
- **TNI needs to develop a range of solutions to address many concerns.**

Reports on Recommended Options

1. Training

- Have TNI develop assessor training, both for technical training and for assessment techniques. **High priority, short timeframe**
- Assigned to Technical Assistance
 - Reviewed and accepted
 - TAC will identify training needs, priorities, best delivery method, learning objectives and content for training providers

2. Administrative Support Services

- Develop a number of support services (e.g., tracking proficiency test data) that TNI could provide to ABs to relieve some of their workload. **Medium priority, long timeframe**
- Assigned to LAB Committee
 - Reviewed and accepted.
 - Will focus on development of a standard (generic) application form for lab accreditation that can be completed online using the MN ELDO database.

3. National Database

- Implement the National Database of accredited laboratories by August 2011 to enhance reciprocal accreditations. **High priority, medium timeframe**
- Assigned to IT Committee
 - Information on 1625 laboratories has currently been entered into the database.
 - MN, OR, NH, TX, UT and VA have FoAs entered.
 - Some states lack the resources to convert their data into LAMS.

4. Use of Third Party Assessors

- Enhance the process by which NELAP-recognized ABs can use third-party assessors
Medium/high priority, long timeframe
- Assigned to LAB Committee
 - Reviewed and accepted
 - Started the process to develop qualifications for third party assessors.
 - Will involve developing criteria for states to use to evaluate third party assessors, but may not include a separate credentialing process.

5. Use of Assessments Performed by Other Accreditation Bodies

- Use the laboratory assessments performed by the Department of Energy (DOE) or the Department of Defense (DOD) Accreditation Bodies in lieu of assessment performed by the NELAP AB. **High Priority, Short timeframe**
- Assigned to NELAP AC
 - LASEC provided a report to the NELAP AC on this recommendation.
 - The NELAP AC will review this report and make a decision by March 2012. Concerns about report structure and assessor qualifications.

6. Sharing of Information and Resources

- Develop a system so that NELAP ABs could better share information and resources.
Medium Priority, short timeframe
- Assigned to LASEC
 - Reviewed and generally endorsed
 - More discussion needed on sharing of assessors from multiple states.
 - Developed an implementation plan for sharing form letters and related documents.

7. Surveillance Assessments

- Develop a process to allow the use of surveillance assessments to extend the time frame for a reassessment to beyond two years. **Medium priority, long timeframe**
- Assigned to LASEC/LAB workgroup
 - Cannot recommend the use of surveillance assessments.
 - NELAP AC disagrees and has proposed changing the standard to require full assessment every 5 years and surveillance assessments every 2.5 years.

8. Non-Governmental Accreditation Bodies

- Develop a process to allow non-governmental ABs (also called third-party ABs) to offer accreditations that would be accepted through reciprocity by the existing NELAP-recognized ABs, especially in states that do not operate a NELAP accreditation program, or where an existing state program may be privatized. **High priority, long timeframe**

Non-Governmental Accreditation Bodies

- Identified subcommittees for review
 - Subcommittee 1: Recognition Process
 - Subcommittee 2: AB acceptance
 - Subcommittee 3: Office of Water
 - Subcommittee 4: Need for standards change
 - Subcommittee 5: Closely affiliated AB
 - Subcommittee 6: Outreach
 - Subcommittee 7: Fiscal impact

Non-Governmental Accreditation Bodies

- Subcommittee 1: Recognition Process
 - Dave Speis, Team Leader
- Findings:
 - 3rd party ABs can comply with the same recognition process as the NELAP ABs.
 - There is one minor language change needed in the current NELAP AB recognition SOP.
 - Fee structure for ABs is acceptable for 3rd party ABs as well.

Non-Governmental Accreditation Bodies

- Subcommittee 2: AB acceptance
 - Steve Arms, Team Leader
- Findings:
 - Will need to overcome perceived emotional and philosophical as well as regulatory impediments.
 - Restricting 3rd party ABs to accreditations in non-NELAP states may be the best way to implement initially.

Non-Governmental Accreditation Bodies

- Subcommittee 4: Need for standards change
 - Lynn Bradley, Team Leader
- Findings:
 - No need for revision to the TNI standard to allow for non-governmental ABs. The only reference to “governmental” is in “Notes”.

Non-Governmental Accreditation Bodies

- There do not appear to be any serious show stoppers on use of non-governmental ABs, however, some fear that needs to be alleviated
- The position of the EPA DW program appears to be that as long as the state makes the final decision, all other parts of the certification process can be accomplished by a non-governmental party

Non-Governmental Accreditation Bodies

- TNI could possibly approve third-parties for labs that just need a NELAP accreditation, especially in states that have not implemented a program. We should start small (pilot) and see how it works
- Some states might be better able to accept an accreditation from a non-governmental AB if the state had some control over the organization (organization closely affiliated with TNI)

Next Steps

- Initiate a dialogue with the Office of Water to discuss 3rd party AB option relative to the drinking water certification program.

Questions, comments?

Additional comments can be emailed to

Judy Duncan judy.duncan@deq.ok.gov

or

Carol Batterton carbat@beecreek.net