Accreditation Body Task Force II

Judy Duncan, Chair

History of ABTF II

- Chartered by TNI Board to follow up on ABTF Recommendation #8
  - 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.

Members of ABTF II

- Aaren Alger
- Susan Boutros
- Judy Duncan, Chair
- Keith Greenaway
- Sharon Mertens (ex officio)
- Judy Morgan
- Alfredo Sotomayor, Vice Chair
- Dave Speis

- Associate members:
  - Steve Arms
  - Elizabeth Turner,
  - Michelle Wade
  - Stephanie Ostrowski

- Carol Batterton, TNI staff
- Lynn Bradley, TNI NELAP Evaluation Coordinator
- Jerry Parr, TNI Executive Director

Objectives

- Develop a process for recognizing non-governmental ABs to be authorized to grant accreditations in accordance with the TNI Environmental Laboratory Sector Standard.
- Develop a concept for a national accreditation program that incorporates both non-governmental AB and governmental AB accreditations and facilitates mutual recognition. Ensure that the concept is consistent with the requirements of EPA's drinking water program.
- Develop a process to attain the concept identified above. Recommend implementation milestones for each action.

Objective 1

- Develop a process for approving non-governmental ABs (NGABs) to be authorized to grant accreditations in accordance with the TNI Environmental Laboratory Sector Standard

Administrative

- Use application process similar to current NELAP process
  - The application form may need slight modification
- Application fees for ABs will depend on TNI management and oversight
  - Current NELAP fee is $6000 (covers evaluator travel, QAO and EC)
  - NEFAP fee is $2500 but evaluator travel is funded separately
- *For consistency, the same person who reviews state AB applications for administrative completeness should review NGAB applications*

Evaluation

- Evaluation team composition:
  - Lead Evaluator (LE)
  - State or EPA person
  - Quality Assurance Officer
  - Other interested observers
- TNI should consider hiring a contract LE to use for NGAB & state AB evaluations.
- Set criteria for observers
  - Observers pay their own way

Onsite

- Use scheduling timeline consistent with current NELAP Evaluation SOP
- Set timeline for performing evaluation after application is determined to be technically complete
- Reconcile the number of files to be reviewed. NEFAP says "representative number." NELAP says a "minimum of 3 files."

Evaluation Report

- Use existing NELAP SOP process
- Will need to address access to NGAB evaluation reports
  - May need NGAB contract with lab to specify that evaluation report will be public information
- NGAB response to evaluation report should be reviewed by the evaluation team
- Specific issues may go the approval body for clarification

Recommending NGAB for Recognition

- Is the process "approval" or "recognition"?
- Approval means accepting the NGAB as meeting the requirements of the TNI standards.
- Recognition means there is mutual recognition among ABs
- DW certification will always have to be from a state AB.
- Indication that some ABs may have statutory impediments to working with NGABs on the NELAP AC

Survey of State NELAP ABs

- 12 0f 15 states responded
- Seven states have indicated that they would be able to approve an NGAB to be a member of the NELAP AC
- Six states responded that they would not be able to approve NGABs

Bottom Line

- An evaluation process similar to the current NELAP/NEFAP Evaluation SOP can be designed to approve NGABs as meeting requirements of the TNI standards to accredit laboratories.

Big Question

- Who is the approval body for NGABs?

- Options:
  - NELAP AC,
  - Hybrid NELAP-NEFAP body
  - A different body altogether

Next Big Question

- If approval body is NELAP AC, how will business processes of AC need to be modified?

- If not the NELAP AC, how will we ensure consistency between state ABs and NGABs?

Issues for More Discussion

- If not all NELAP state ABs can have mutual recognition with NGABs, NGABs will need to be transparent with their clients about how accreditations can be used
- Enforcement processes/systems will need to understood by all parties
- How will access to assessment reports and other information be handled by NGABs?
- NELAP AC operational SOPs (voting) may need to be modified if NELAP AC is approval body
- How will NGABs be incorporated into the national database?

Next Steps

- ABTF II plans to have discussion with NGABs on these issues to better understand NGAB processes

QUESTIONS AND COMMENTS?