

Summary of the Laboratory Accreditation Body Expert Committee Meeting
Forum on Laboratory Accreditation, San Antonio, TX
Wednesday, January 11, 2023 8:00 am Central

1. Welcome and Introductions

Aaren opened the meeting. She and Yumi were the only voting members of the committee present.

2. Status of Revised Draft Standard

Aaren explained that the committee had received ninety-five (95) formal comments, all of which were considered, discussed and voted, with 60 persuasive, others not persuasive, editorial or withdrawn. The decision on one comment remains to be voted. The committee has continued to accept comments and suggestions when submitted, whether by committee members and associated or others, with the goal being to issue the next draft with hope for full buy-in by the environmental laboratory community.

The final Response-to-Comments document will be published along with Draft Standard Revision 1, and all commenters will be notified about the resolution of their comments, once final language for the Draft Standard Revision 1 is agreed upon and formally approved.

3. Proposed Changes to V2M1 in Response to Comments

Aaren discussed all changes agreed upon thus far to the Draft Standard V2M1 that was published in December 2020. She also noted several general changes throughout the document:

- Terms and Definitions §3 alphabetized (reference citations kept)
- Used CAB acronym consistently
- All numbers are spelled out
- Removed all duplicate section citations (they were the same as the section numbers)
- Refer to TNI EL Standard (rather than TNI ELS Standard)

Other changes were presented individually, with the original version showing the changes in a “tracked” format. Only those changes that generated discussion are noted here; if a change is not mentioned, there were no comments from participants when it was presented.

§6.1.2.10 – this section presently requires that an assessor have experience assessing environmental labs, and there has been some question about whether specific experience with environmental labs is necessary or if assessing other types of labs would be adequate. One commenter noted that the technical aspects – methods and technologies – are an important part of the experience needed.

§6.1.3.2.1 – again, the question arises about whether specific environmental experience is necessary, and a different commenter agreed that the term “environmental” should be retained. Additionally, a comment was made about this section, asking whether it might be appropriate to allow for an “interim assessor” designation, in the same fashion as “interim certification” is permitted for labs.

§6.4.1.1 – the committee has discussed at length whether the AB or the assessor should be permitted to release the assessment report to the laboratory, and the committee has agreed that assessment reports should only be issued by the AB. Aaren requested discussion and feedback about this topic, but there were no comments offered.

§7.3.3 – with awareness that a variety of ways to accredit mobile labs are currently used by ABs. While there is no disagreement about how a mobile lab should be assessed, some ABs consider a mobile to be part of its parent fixed-base lab while others accredit it independently and few ABs recognize mobile labs for secondary accreditation. The majority of the committee favors requiring that an AB have a defined system for accrediting mobile labs. Comments were that mobile labs must meet the same requirements as fixed base labs, whether or not they use the same quality system as their “parent” lab, but the issue is whether mobile labs are considered part of the parent fixed base lab or a separate entity. Another commenter noted that TX groups multiple sites (whether mobile or fixed) in one certificate, even though one specific site may not perform certain methods. Aaren promised that the committee will discuss this further before settling on revised language.

§7.6.11.1 – Aaren asked whether thirty days is sufficient time for a revised corrective action report, but there were no comments from participants.

§7.6.13 – this minor revision allows for reports to be issued on the day following a weekend or holiday, if the thirtieth day falls on a weekend or holiday. (It resolves the question from SIR 262, which was withdrawn as unanswerable without changing the language of the Standard.)

Remote Assessments – this topic touches on multiple sections, and has been discussed in the committee and with the NELAP AC repeatedly, but final language remains to be settled. The use of remote technology for full assessments at a two-year interval fits within the five-year reassessment requirement of the ISO language, but the breadth and depth of a “remote assessment” to meet the two-year reassessment requirement of TNI will need to be clearly defined in the Standard. While some NELAP ABs may wish to set more stringent requirements (i.e., only in-person on-site assessments), that AB would need to justify its additional requirement and find some way to accommodate mutual recognition of labs whose primary AB uses remote assessments. It is not within TNI’s purview to force all ABs to discard the use of remote assessments because one or several of the NELAP ABs decline to accept them – recognition issues among ABS will need to be settled between the affected ABs.

There was general agreement that initial assessments should be on-site, but that if a declared emergency prevents a site visit, then one should be conducted as soon as possible once the emergency is over. Also, repeated remote assessments should not be allowed – there should be one on-site assessment at least within the five-year window (alternating remote and on-site). However, in any case, increased use of remote technology for document reviews and interviews is almost certain to occur, even when a site visit is planned, as this reduces both the number of assessors and the time needed for the site visit without decreasing the actual review work that needs to be accomplished.

§7.13 – Aaren noted that as part of the Mentor Session preparations, a survey of ABs indicated that most appeals are addressed using a formal process required by the state agency in which the AB is located. There was no further discussion on this topic.

§7.14.3 – one commenter noted that the current five-year retention requirement does not specify when the time begins, and recommended that be added. Another commenter noted that EPA Region 8 requires that records be retained for two cycles of drinking water certification (six years), so that perhaps a retention time of three accreditation cycles (TNI two-year cycles, so six years total) would be appropriate. It was noted that §7.14.2 establishes the retention requirement, but that §7.14.3 establishes the minimum time for retention.

§8.2 – the current accommodation to the ISO language requirement that information be available “without request” is to state that this section is not applicable. Commenters noted that the information DOES need to be available, and that everything except suspensions and withdrawals

already exists (where ABs report it) in LAMS. Posting and maintaining suspension and withdrawal information for labs (e.g., from PT failures, not just loss of accreditation) is not currently part of any state's information systems and would require both IT resources to build and staff resources to maintain the information as current – not likely something that state agencies will provide. The note (or perhaps a new §8.2.2.1) should be reworded to state that making information available upon request will be considered as meeting the requirement.

§9.7.1 – the current revision to the ISO requirement was intended to make internal audit procedures for ABs equivalent to those for labs (in Volume 1). One commenter noted that the Quality Management Systems Expert Committee is discussing that labs be required to audit every method at least once every three years (instead of every two, as it is now), so with the AB evaluation cycle being three years, that would be appropriate for ABs. Also, Paul Junio noted that the TNI Glossary defines “annual” as once per year, not to exceed thirteen months, and recommended using that term rather than the current phrasing of “a frequency that does not exceed fourteen months”.

4. Discussion/Questions from Participants

No additional issues were raised for discussion beyond those presented by Aaren.

5. Next Meeting

The next teleconference meeting is scheduled for **Tuesday, January 17, 2023, at 1:00 pm Eastern**. An agenda and documents will be distributed prior to the meeting.

Attachment 1

LAB Expert Committee Roster

| Name/Email | Term ends | Affiliation | Present? |
|---|-------------------------------------|---|-----------------------------|
| Aaren Alger, Chair Aaren.s.alger@gmail.com | 1/30/2023 (1 st term) | Other – Alger Consulting & Training | Yes |
| Socorro Baldonado sbaldonado@mwdh2o.com | 1/30/2023 (1 st term) | Lab – Metropolitan Water District, La Verne, CA | No |
| Nilda Cox nilda.cox@et.eurofinsus.com | 1/30/2025 (2nd term) | Lab – Eurofins Eaton Analytical LLC | No |
| Yumi Creason, Vice Chair ycreason@pa.gov | 1/30/2025 (1 st term) | AB – Pennsylvania | Yes |
| Bill Hall george.w.hall@des.nh.gov | 1/30/2026 (1st term) | AB – NH DES | No |
| Sviatlana Haubner Sviatlana.Haubner@cincinnati-oh.gov | 1/30/2025 (1 st term) | LAB – Cincinnati Metropolitan Sewer District | No |
| Michella Karapondo Karapondo.michella@epa.gov | 1/30/2025 (1st term) | Other – EPA OGWDW TSC/Cincinnati | No |
| Michael Perry michael.perry@lvvwd.com | 1/30/2023 (1 st term) | Lab – Southern Nevada Water Authority | No |
| Zaneta Popovska zpopovska@anab.org | 1/30/2025 (2nd term) | AB – ANAB | No |
| Program Administrator: Lynn Bradley Lynn.Bradley@nelac-institute.org | N/A | | Yes (listening remotely) |
| Associate Members: | | | |
| Scott Haas shaas@etilab.com | | Lab – Environmental Testing, Inc., and Chair, FAC | No |
| Taryn Hurley taryn.hurley@deg.ok.gov | | AB – OK DEQ | No |
| Paul Junio paul.junio@pacelabs.com | | LAB – Pace Labs, Inc. | Yes |
| Carl Kircher, Chair carl_kircher@flhealth.gov | | AB – Florida Department of Health | No |
| Marlene Moore mmoore@advancedsys.com | | Other – Advanced Systems, Inc., Newark, DE | No |
| Mei Beth Shepherd, Vice Chair mbshep@sheptechserv.com | | Other – Shepherd Technical Services | Yes |
| Aurora Shields Aurora.Shields@kcmo.org | | Lab – KC Water | No |
| Nicholas Slawson nslawson@a2la.org | | AB – A2LA | No |
| Ilona Taunton Ilona.taunton@nelac-institute.org | | Other – TNI Program Administrator | No |
| Cathy Westerman cathy.westerman@dqs.virginia.gov | | AB – VA DCLS | No |

Attachment 2 – LAB Expert Committee Session, January 11, 2023

- Welcome and Introductions
- Status of Revised Draft Standard
- Proposed Changes to V2M1 in Response to Comments
- Discussion/Questions from Participants
- Adjourn