

Summary of the Laboratory Accreditation Body Expert Committee Session
Environmental Measurement Symposium/Forum on Laboratory Accreditation
Garden Grove, CA, Tuesday, August 6, 2024 9:00 am Pacific

1. Welcome

Aaren welcomed everyone to the session, and invited those committee members present to introduce themselves.

The presentation was divided into two parts. First were the changes already agreed upon within committee discussions in response to persuasive comments and an Accreditation Council request, and the second part was about more complex comments that still remain to be addressed. Aaren followed the outline of her presentation, which is being distributed with these minutes (and will also be available on the conference website eventually). This summary will only note discussion points about particular issues, to the extent that the comments were audible. Committee members who were present have been asked to contribute additional information that they recall from the discussion.

During the discussion, Aaren also clarified the roles of TNI, NELAP, and the Expert Committees. The Expert Committees write the consensus-based Standard (different modules assigned to different committees), while NELAP adopts and implements the Standard for use in assessing and accrediting laboratories. Non-governmental ABs (NGABs) use the Standard that NELAP adopts for their assessments. Neither the Expert Committees nor TNI accredit labs, although TNI provides many support services for the environmental lab community and accreditation.

2. Changes Agreed Upon Within Committee – Specific Comments on Individual Sections

§6.4.4.1 – the timeframes for releasing the assessment report and for lab responses are to be extended from 30 to 45 days, with agreement from the NELAP AC, for the purpose of allowing the Accreditation Bodies (ABs) additional time to review assessment reports prior to release to the lab, after the 30 day deadline that exists in most third party assessor contracts.

§7.8.3 – Aaren clarified the distinction between primary and secondary accreditations, while explaining that the purpose of naming the primary AB and the Standard used was to ensure that all secondary accreditations (state recognition of accreditation granted by a different state, not requiring any further assessment) can be traced to the primary AB (the AB that performed the laboratory assessment).

§7.9.3 – ISO language based on a 5-year assessment cycle with a sample of the lab's scope assessed every two years conflicts with the TNI Standard's schedule of every 2 years plus/minus 6 months. The second paragraph of this section will be deleted (ISO text removed) to avoid confusion with TNI requirements. In later subsections, the option of remote assessments for the every 2 year assessment will not be allowed except in cases of governmental-declared emergency. While remote assessments were used by NELAP during the year 2000 pandemic emergency, at least one NELAP AB cannot grant secondary accreditation to a lab that had only a remote assessment, so that all labs must have an on-site visit. Some aspects of the assessment such as document reviews may be done remotely (off-site), the Standard will specify that personnel interviews, witnessing, and equipment verifications be done on-site.

3. Issues and Comments Remaining to be Considered by LAB

§6.2.2 – ISO language presumes that non-employee assessors will be contracted to the AB. A comment requested that this be modified, as at least one NELAP AB does not have signed contracts with its third party assessors. One suggestion was that third party assessors be required to affirm their commitment to the AB's policies or affirm that they follow them. An

informal poll of the audience showed that they favor contracts as signed agreements. Aaren noted that, as a NELAP evaluator herself, she has observed that ABs using third party assessors do not necessarily hold those contractors to the same requirements and procedures as state employees are required to follow.

A second part to this section addressed how (and whether) an AB determines the qualifications of third party assessors working for an organization contracted to the AB to provide assessment services. At present, there are no requirements in the Standard to address this, so that an AB may not have records for those individuals working under an organizational contract umbrella. Consensus seemed to be that, at minimum, the AB should have a copy of training records for those assessors, and a procedure for evaluating their qualifications.

A question was raised about whether or not the term “assessor” is defined in the Standard. That definition is §3.30 of ISO/IEC 17011, and will be retained in the TNI Standard, although possibly with a different section number.

§6.4.4.1 – Revision 1 of V2M1 added a requirement that the AB issue assessment reports. This brings a second issue to this section that LAB has not yet addressed, about the practice of third party assessors delivering (issuing) assessment reports to labs at the same time those reports are delivered to the AB. This occurs in at least one NELAP AB. There are two considerations: what does “issue the report” mean, and is it acceptable for the lab to receive a report that the AB has not yet approved.

Issuing the report – EPA has stated that the AB itself should deliver the report to the laboratory, because the drinking water certification authority must trace back to EPA through the state certification/accreditation body. EPA is responsible because the Safe Drinking Water Act makes it so. There was strong support for AB issuance of reports in a show of hands from the audience. NOTE: This would only apply to labs being accredited for drinking water, and does not mean that an AB employee must literally write the report, but that the AB has a responsibility to review and approve it, and then to deliver it to the lab.

Assessor delivering report to lab – the practice of the AB in question is that, if a correction is needed to the report, it is issued once the AB reviews it, and timeframes (for that issue only) are adjusted accordingly. Assessors and the AB in question believe that this process is satisfactory, since corrections are quite rare. LAB committee still needs to consider the acceptability of this practice.

NOTE 1: It may be that NGABs have contract personnel issuing accreditation decisions, which brought a discussion of §6.4.2. Since EPA will not recognize NGAB accreditations for drinking water, a suggestion that the phrase in §6.4.2 requiring that the person making accreditation decisions could be “under enforceable agreement” with the AB itself, and that perhaps some exception needs to be added for NGABs, but after discussion, the current phrasing was deemed acceptable for NGAB practices.

NOTE 2: §6.4.6 requires that the AB have procedures for monitoring all “outsourced services”. This has been taken to mean monitoring of third party assessors, but if other services are outsourced, would they always involve a contract?

Documenting Assessment of Preparatory Methods (no current section number)

Some ABs accredit prep methods, while others require them to be assessed as part of the method itself. This latter assessment is not always documented in the assessment report, and if a third party assessor was utilized, the record of any given prep method’s assessment may not even be in possession of the AB. For secondary accreditations to be granted by those ABs that do accredit prep methods, some documentation is necessary. This is a long-standing and thorny issue among NELAP ABs, and there is one school of thought that says “if the lab must document everything, then the AB should, as well”.

There is no standard format for assessment reports, but the Standard does list certain items that must be included. Should prep methods be on the mandatory inclusion list, or in some alternative language within the Standard? There was consensus around the following:

- Assessment records must include “all methods for which the lab was assessed, including prep methods.
- The assessment records must be retrievable. Does this mean that the AB must retain the record, even if it was a third party assessor and whether or not the prep method assessment was included in the assessment report? (And should this apply to other aspects of the assessment?)

One additional question raised was about what prep methods should be called in the assessment report, if included but not accredited?

Discussions with QMS Expert Committee about Review of Technical Specialist Qualifications

Aaren summarized the lengthy discussions within LAB and even the Board of Directors about whether there should be some mandatory (and short) review time allowed for the AB to determine that a replacement or interim Technical Specialist is qualified, so that the lab does not have to halt testing in that part of the lab due to not having a Technical Specialist. To date, no suitable language has emerged, only the suggestion that it become a policy for the NELAP AC, but Aaren invited thoughts from the audience. QMS has essentially given up on a solution to this issue, and ABs have been reviewing Technical Manager qualifications, literally for always, without shut-downs, so possibly there is no need for a solution. This issue will not delay V2M1.

Annex A

Aaren invited opinions about whether Annex A should be included in the TNI Standard. This Annex is merely a different way of presenting the information contained in the lengthy text of ISO/IEC 17011 about requirements, and LAB is inclined to omit it from the TNI Standard. No opinions were offered.

4. Closing Remarks

Aaren invited anyone interested to apply for LAB membership. The timeframe for completion of Revision 2 is uncertain, as the committee is already months later than hoped, but there are difficulties in achieving a quorum, which prohibits voting on whether comments are persuasive or not, so additional members would help achieve quorum.

She then thanked all of the participants for their interest and feedback.

5. Next Meeting

The next planned teleconference meeting is scheduled for **Tuesday, August 20, 2024, at 1:00 pm Eastern**. A new Vice Chair will need to be elected at this meeting.

Aaren asks that committee members unable to attend please notify her and Lynn prior to the meeting date.

Attachment 1 LAB Expert Committee Roster

Name/Email	Term ends	Affiliation	Present?
Aaren Alger, Chair Aaren.s.alger@gmail.com	1/30/2026 (2nd term)	Other – Alger Consulting & Training	Yes
Socorro Baldonado sbaldonado@mwdh2o.com	1/30/2026 (2nd term)	Lab – Metropolitan Water District, La Verne, CA	Yes
Nilda Cox nilda.cox@et.eurofinsus.com	1/30/2025 (2nd term)	Lab – Eurofins Eaton Analytical LLC	Yes
Bill Hall george.w.hall@des.nh.gov	1/30/2026 (1st term)	AB – NH DES	
Sviatlana Haubner Sviatlana.Haubner@cincinnati-oh.gov	1/30/2025 (1 st term)	LAB – Cincinnati Metropolitan Sewer District	
Michella Karapondo Karapondo.michella@epa.gov	1/30/2025 (1st term)	Other – EPA OGWDW TSC/Cincinnati	
Michael Perry michael.perry@lvvwd.com	1/30/2026 (2nd term)	Lab – Southern Nevada Water Authority	Yes
Zaneta Popovska zpopovska@anab.org	1/30/2025 (2nd term)	AB – ANAB	
Amy Steuerwald amy.steuerwald@health.ny.gov	1/30/27 (1st term)	AB – NY DOH	
Program Administrator: Lynn Bradley Lynn.Bradley@nelac-institute.org	N/A		
Associate Members:			
Paul Bergeron Paul.bergeron@la.gov		AB – LDEQ	
Debbie Bond dbond@southernco.com		LAB – Alabama Power	
Yumi Creason ycreason@pa.gov		Other	
Taryn Hurley taryn.hurley@deq.ok.gov		AB – OK DEQ	
Paul Junio paul.junio@pacelabs.com		LAB – Pace Labs, Inc.	
LeeAnn Kline lkline@mireider.com		M J Reider Associates	
Ryan Lerch Ryan.lerch@deq.ok.gov		AB – OK DEQ	
Marlene Moore mmoore@advancedsys.com		Other – Advanced Systems, Inc., Newark, DE	
Mei Beth Shepherd, Vice Chair mbshep@sheptechserv.com		Other – Shepherd Technical Services	
Nicholas Slawson nslawson@a2la.org		AB – A2LA	
Ilona Taunton Ilona.taunton@nelac-institute.org		Other – TNI Program Administrator	
Cathy Westerman cathy.westerman@dqs.virginia.gov		AB – VA DCLS	

Attachment 2 – LAB Expert Committee Meeting Agenda, July 16, 2024

5. Welcome and Roll Call
6. Approval of Agenda
7. Approval of Minutes (June minutes attached)
8. Initiate Nomination(s) and Possible Vote for Vice Chair
9. Follow-up to QMS Discussion about TS
 - a. From July 10 Board discussion, consider adding a requirement that the AB have a policy or procedure for evaluating and approving professional lab staff where specific requirements in Volume 1 apply
10. Resume Review of Comments with Voting on Persuasive/Non and Modifying Language if Required (draft module and response-to-comments documents attached)
11. Attendance at Conference (LAB Session, Tuesday morning, August 6, 9 - noon PDT)
12. New Business, if any
13. Adjourn