SUMMARY OF THE
ON-SITE ASSESSMENT COMMITTEE TELECONFERENCE
OCTOBER 28, 1998

The On-Site Assessment Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Wednesday, October 28, 1998, at 12:30 p.m. Eastern Standard Time (EST). The meeting was led by its chair, Mr. Steven Baker of the Arizona Department of Health. A list of action items is given in Attachment A. A list of participants is given in Attachment B. *The purpose of the meeting was to discuss the technical training courses for assessors.*

INTRODUCTION

The committee was joined in the teleconference by Ms. Barbara Finazzo and Ms. Patricia Sheridan, both of U.S. States Environmental Protection Agency (EPA) Region 2. The purpose of their participation in the teleconference was to facilitate communication between the committee and EPA in the development of basic and technical training course curricula. EPA is considering providing some seed money for the initial development of the training courses. Ms. Finazzo explained that if the agency will be funding course development then they will be actively involved in course development.

COMMENTS FROM STATE NELAC WORKGROUPS

Mr. Baker began the meeting by addressing comments he had received from NELAC workgroups in Pennsylvania and Virginia. The main concern of the Pennsylvania group is for the impact of NELAC on small laboratories. They expressed the belief that NELAC places an unfair quality assurance (QA) burden on small laboratories. A committee member noted that the issue of burden on small laboratories has come up repeatedly, and suggested that this is an issue for the states rather than for NELAC. This generated considerable discussion. It was noted that NELAC participation is voluntary for the states and that the driving purpose for NELAC has been to develop one standard to reduce redundancy for certification if laboratories work nationally. This led one committee member to comment that the burden on small laboratories is a state-by-state issue in which the state must ascertain whether the laboratory will perform analyses outside their state. It was suggested that individual states write their regulations so as to define a NELAC-applicable laboratory. Committee members from the regulatory sector shared that they have found small laboratories to be united against NELAC because most of them do not work outside their home state. Consequently, many states may have to administer a dual program. Since existing regulatory language does not recognize NELAC accreditation as being equivalent to the pertinent state accreditations, some legislation may be required to change the state regulations. It was also noted that within a few years clients may demand NELAC certification whether or not a laboratory performs analyses outside the state. The committee agreed that Mr. Baker would draft a response to the Pennsylvania workgroup explaining that the November 20 deadline for NELAC IVi does not allow the committee to address this issue now. If a severe inequity in the Standard surfaces, the committee will try to address that inequity before the annual meeting.

The main concern of the Virginia workgroup is their perceived need for revision and clarification of the language used in the Standard and the training manual. They enclosed several pages of proposed changes to and comments about the current language. In discussion of these proposed changes, the committee agreed that word smithing the Standard is not their primary goal at this time. The two primary issues facing the committee before NELAC IVi are completing the assessment checklists and training (finalizing the training manual and fleshing out the technical training courses). The committee agreed, therefore, that Mr. Baker would draft a response similar to that prepared for the Pennsylvania workgroup. Unless some severe inequity in the Standard surfaces, these word smithing issues will not be addressed before the next annual meeting.

STATUS OF ASSESSMENT CHECKLISTS

The committee briefly discussed the on-site assessment checklists. Ms. Marlene Patillo reported that although she has not had time to finish compiling the checklists, they should be ready by November 6, 1998, and will be posted on the NELAC Website before the interim meeting. She has not significantly modified the checklists that have been given to her. Ms. Patillo suggested that assessors start with method-specific checklists and then add a performance-based measurement system (PBMS) checklist which could be used with any method. A PBMS checklist is found at the back of the Quality Systems chapter of the standards. Although there is a move toward PBMS, many laboratories will probably still be using specified methods. As a result, the committee anticipates criticism from both the method-specific and PBMS sides. Ms. Barbara Finazzo, EPA Region 2, informed the committee that the agency will address PBMS on a program-by-program basis. The Office of Water's policy on PBMS should be out in the Federal Register sometime in December before the interim meeting. Ms. Finazzo suggested that the committee state from the beginning that the posted checklists are only a beginning in order to allay criticisms.

COMMENTS ON TECHNICAL TRAINING COURSES

The committee entered into lengthy discussion about the technical training courses. Ms. Finazzo suggested coordination of the development of technical training courses between EPA and the On-Site Assessment Committee. She explained that EPA on a national level is trying to create a mechanism for funding for course development. The agency is not trying to bypass the committee. Ms. Finazzo described a cooperative effort in which the agency and the committee together would specify course content, and an outside contractor would develop course materials, overheads, videos, etc. A committee member explained that, as a consequence of the committee's unpleasant experience with an outside contractor in the development of the training manual, the committee might be somewhat hesitant until a contractor has demonstrated that it will deliver exactly what is expected.

Discussion then turned to specific concerns about the training courses. While the committee has been developing course outlines, the EPA has also been developing some course outlines. Ms. Finazzo requested copies of any technical training course outlines developed so far by the committee. In response the committee requested copies of any courses developed so far by EPA. To date the committee has only focused on the organics course. Ms. Finazzo has focused on the microbiology course. It was suggested that both of these courses be posted before the interim

meeting as two prototype courses. The organics course, with its data packages and exam, is a relatively new concept, while the microbiology course is more standard.

Ms. Finazzo expressed EPA's concern that the committee's suggested time requirements for training are excessive. She is getting feedback from the EPA QA community that they're not sure that people will be able to afford all the necessary training. For example, the basic training course, as outlined by the committee, is a five-day course. This includes a one-day introduction and a four-day review of the standards. Ms. Finazzo questioned the level of detail in the basic training course, and suggested that specifics might be reserved for the pertinent technical training courses. She suggested that the qualifications portions of the Standards cover the issue of auditor competence, and made clear her position that putting excessive training requirements on state auditors does not move the program forward. She also suggested that the committee develop courses and try them out before they lock themselves into a time schedule.

Committee members responded to Ms. Finazzo's comments by explaining and clarifying their position on the training issues she had raised. It is the committee's position that the days of the "Jack-of-all-trades" auditor are over. To audit to the specifications of the Quality Systems chapter of the Standards, an auditor must truly be an expert in his or her field. The committee wrestled with the task of auditing against the Quality Systems Standard. They tried not to overstep the Standard or add their own interpretations, but to provide guidelines on training which reflect and reference the Standard. Most of an auditor's training should have already come through experience. By the time an auditor takes a training course, perhaps only advanced concepts should necessarily be covered. The reality is that auditors may have to stand up in court. The reason time schedules were included with the training courses was to show people how long the committee thought the courses should take. It was the committee's intent to design the best of courses and then let the conference cut and trim as necessary. One of the reasons the committee developed the 2.5-day training courses is so that auditors could save money by taking two courses in one week. It is true that putting definite time frames on courses before they've actually been developed is difficult. Time frames could be amended after experienced people are farther along in the development of the curricula. Ms. Finazzo responded favorably to this statement, and suggested that the committee initiate a discussion at the interim meeting explaining the cooperative effort in developing the curricula and that the time frames can be amended.

Committee members agreed that the outline of the basic training course is complete. EPA and a selected contractor can now develop the basic training course. The course needs to be developed within the next two years. The committee hopes to have skeletons of the technical training courses completed by NELAC IVi. These skeletons will be fleshed out by the next annual meeting. Within two years the committee will have a very good technical course product for development by the selected contractor. This time line should fall nicely into the four-year grandfathering period for auditors. Mr. William Toth, who was supposed to get cost information from the Registrar Accreditation Board (RAB) for the development of the training courses, was unable to participate in the teleconference. Mr. Baker suggested that Ms. Finazzo contact Mr. Toth to get this information. The committee agreed that several organizations are capable of developing the training courses. They pointed out that curricula are already written out in the Standards so courses should be uniform, even if provided by multiple organizations. Ms. Finazzo responded that interpretation issues arise when many different organizations develop the same

course. Ms. Finazzo stated that she would communicate the results of this teleconference to Ms. Jeanne Mourrain and Ms. Nancy Wentworth.

A committee member asked if the laboratory application for NELAC certification had been posted on the NELAC Website. Ms. Finazzo responded that it has not. The target date for the first round of applications is February 1999, but this date is just a target.

Mr. Baker reiterated that the two primary issues facing the committee before NELAC IVi are the checklists and training (training manual and technical courses). In order to more efficiently flesh out the technical training courses, he suggested splitting them up among the committee members according to their area(s) of expertise. It was acknowledged that most committee members would probably not be able to complete all of the technical training courses by the November 20 deadline for posting on the NELAC Website before NELAC IVi. The following course assignments were made:

- Microbiology - Ms. Finazzo
- Organics - Mr. Baker
- Inorganics Nonmetals - Ms. Patillo and Ms. Athene Steinke
- Inorganics Metals - Mr. Wayne Davis
- Bioassay - Ms. Roseanna Buhl
- Radiological Chemistry - Ms. Lee Eckman will contact Mr. Stan Morton to accept this course assignment. Ms. Finazzo commented that Ms. Betsy Dutrow had contacted Mr. George Dilbeck in Las Vegas, and suggested that Ms. Eckman and Mr. Morton contact Ms. Dutrow for pertinent information.

CONCLUSION

Mr. Baker concluded by summarizing the three items that the committee should be prepared to submit to EPA by the November 20 deadline for posting on the NELAC Website for NELAC IVi. These items are: 1) the organics training course outline, 2) the microbiology training course outline, and 3) the assessor checklists. The committee tentatively planned to meet again by teleconference on November 18, 1998, at 12:30 p.m. EST to discuss these three items. If teleconference time is not available on November 18, the teleconference will be scheduled at the next available date. Ms. Finazzo will join the committee in that teleconference to continue the cooperative effort in training course development. Mr. Baker will communicate the specific dial-in details to the committee before that time.

Attachment A

ACTION ITEMS
ON-SITE ASSESSMENT COMMITTEE TELECONFERENCE
OCTOBER 28, 1998

Item No.	Action	Date to be Completed
1.	Mr. Baker will draft responses to the Pennsylvania and Virginia NELAC workgroups concerning their comments on the On-Site Assessment Standard.	12/1/98
2.	Ms. Patillo will assemble and index checklists in one electronic format and e-mail to Mr. Baker for distribution to the committee.	11/6/98
3.	Mr. Baker will obtain from Mr. Owen Crankshaw suggestions for people with whom to consult on the development of the asbestos training course.	11/15/98
4.	Mr. Baker will provide Ms. Finazzo with a copy of the organics course outline.	11/5/98
5.	Ms. Finazzo will provide Mr. Baker with a copy of the microbiology course outline for distribution to the committee.	11/3/98
6.	Mr. Baker will finalize arrangements for the next teleconference (scheduled for November 19, 1998 at 12:30 p.m. EST) and will communicate the specific dial-in details to the committee.	11/5/98

Attachment B

PARTICIPANTS
ON-SITE ASSESSMENT COMMITTEE TELECONFERENCE
OCTOBER 28, 1998

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