

Adopting a Laboratory Accreditation Standard

Christine Sotelo, Chief
California ELAP

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Adopting a Standard

- We have decided to develop our standard based on TNI 2016
- This option offered many benefits:
 - It's off the shelf
 - Implementation tools and training already exist
 - It's consensus-based
 - Makes our training contract easier to execute

Resistance

- However, there has been substantial resistance to TNI
 - 23 of 24 speakers at our Board Workshop emphatically argued against its use
 - 70 of 79 of the letters we received were also in opposition
- ELTAC expressed concern with TNI
 - No one on ELTAC voted for TNI as is
 - More people on ELTAC (7-6) voted for developing our own standard over modifying TNI
- Both ELTAC and the Agency Partners identified areas California could improve on the TNI standard

Process to Determine Modifications

- ELTAC proposed and prioritized revisions
 - We dedicated two ELTAC meetings to this task
 - We also created an opportunity for input from the broader community
- Agency partners determined which of the suggested revisions lessened the value of ELAP certification to their agency
 - They met twice in person to consider ELTAC's proposals
- ELAP then took both advisory bodies' recommendations and made a determination

Our Criteria for Evaluation

- We based our philosophy on two criteria

		VALUE TO AGENCY PARTNERS	
		LOW	HIGH
CHALLENGE TO LABS	LOW	Reject	Reject
	HIGH	Accept	Reject (Potentially Delay)

Modifications

- ELTAC suggested 128 modifications
- We are presently considering 58 total modifications
 - 48 are to add clarifying language
 - 7 are to allow additional time for compliance
 - 3 are to remove sections
- I'll walk you through a few examples of some of the changes we are considering making

Proficiency Testing Frequency

- TNI: Requires 2 PTs per year
 - Module 1, Section 5.0
- Problem: Both the Agency Partners and ELTAC have a low opinion of the PT process and see low value in requiring a second
- Proposed Change: Require one successful PT per year

Subcontracting to ISO/TNI labs

- TNI: Allows subcontracting to ISO- and TNI-certified labs
 - Module 2, Section 4.5
- Problem: Subcontract labs must be CA ELAP-accredited
- Proposed Change: Require subcontract laboratories to be ELAP-accredited

Document Control

- TNI: Requires document control system for compliance
- Problem: High upfront implementation cost is a challenge for small laboratories
- Proposed Change: Allow additional time for implementation

Technical Manager Qualifications

- TNI: Requires Technical Manager to have a Bachelor's degree
 - Module 2, Section 5.2.6.1
- Problem: Prohibits CWEA and AWWA certificate holders from qualifying as technical manager
- Proposed Change: Accept those certifications as qualification to hold Technical Manager position

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We are not done yet

- We are still receiving input
 - We're looking forward to your feedback
 - TNI has recently offered input
 - We plan to have one more meeting with both ELTAC and the Agency Partners
- We need to do this soon
 - Need to agree on our recommended standard before the training program begins
 - We anticipate training begins in April-May
- We then need to incorporate this into a formal rulemaking process
 - My staff will draft the regulatory text
 - Then we will hold community workshops



Questions