

Findings from the Environmental Laboratory Accreditation Program Expert Review Panel



Presentation to the SCCWRP Commission

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BACKGROUND

- **California has a laboratory accreditation program**
 - Required under the Environmental Laboratory Accreditation Act of 1988
 - Largest program in the nation, certifying nearly 700 laboratories
 - Certifies for a wide range of testing types, including chemistry, microbiology, toxicology, radioactivity, air quality, etc.
- **The program was originally housed in the Department of Health**
 - On July 1, 2014 the program moved to the State Water Board
 - Part of the new Division of Drinking Water
- **With the move, the State Board desired a comprehensive independent review of the program**
 - They were aware of many complaints about the program
 - SCCWRP was requested to facilitate the review

EXPERT REVIEW PANEL

- **We recruited five leading experts in the field**
 - None who do business in California
- **We empaneled a Stakeholder Advisor Committee**
 - They helped define the Panel charge questions
 - Assisted in selection of Expert Panel members
 - Jointly developed agenda for the Panel meetings
- **Panel held three in-person meetings**
 - An informational webinar
 - Biweekly Panel conference calls
- **Published a report in October of this year**
 - A presentation to the State Board in November

FINDINGS

- **California's Environmental Laboratory Accreditation Program is in trouble**
 - Not achieving its programmatic mandate to ensure data quality
- **The program lacks credibility with its clients, the laboratories it inspects and other states**
 - California accreditation is no longer accepted by other states
 - This creates extra expense for our commercial cross-state labs
- **Major deficiencies**
 - Poor management system
 - Inadequate staff training and accountability
 - Evaluating out-of-date analytical methods
 - Inadequate resources
 - Poor stakeholder communication

MANAGEMENT SYSTEM

- **Problem**

- Program lacks a comprehensive internal management system
 - At the root of several chronic problems
- There are no employee expectations, no performance metrics, no defined responsibilities

- **Recommendation**

- Adopt a respected management structure standard (ISO 17025)
 - Define operational processes to carry out ELAP functions
 - Clarify staff responsibilities and establish accountability
 - Conduct internal reviews to assess performance
- Well defined processes will enhance consistency and transparency

LABORATORY ACCREDITATION STANDARDS

- **Problem**

- ELAP does not have a clear set of standards by which it conducts its laboratory evaluations
- Combined with insufficient staff qualifications leads to inconsistent and inadequate evaluations

- **Panel identified three options**

- Create ELAP's own State-specific accreditation standard
- Adopt an existing standard (ISO 17011)
- Modify an existing standard

- **Panel recommended inclusion of quality systems into the accreditation standard**

- Small labs are concerned about this
- They want to see emphasis on fixing ELAP, not on upgrading the inspection standards

RELEVANT ANALYTICAL METHODS

- **Problem**

- The list of analytical methods for which ELAP accredits is outdated
- This is because the methods are defined in 1992 regulations
- A challenge for SCCWRP as we try to transition to application new methodologies like qPCR and CEC bioanalytical screening

- **Recommendation**

- Ideal solution would be to eliminate references to specific analytical methods in regulation, but that would require legislative action
- Short-term solution would be to make better use of Title 22 subsections that enable ELAP to use alternate methods

INADEQUATE RESOURCES

- **Problem**

- Staff are unqualified to meet the demands of the program
- As such, the program has a severe backlog
- Inadequate fees have made the program unsustainable
 - Even though the program fees are among the highest in the nation

- **Recommendations**

- Invest in staff development including enhanced training and electronic support tools
- Temporarily accept accreditation from other States
- Allow laboratories to directly contract with third-party assessors
 - Once revised standards and methods are established
- Revise the fee structure

ENHANCE COMMUNICATION

- **Problem**

- ELAP has poor communication and outreach
- The program has not been effectively serving its clients because it doesn't understand client needs
- Largely ignored the Environmental Laboratory Technical Advisory Committee (ELTAC), which was created in legislation to enhance interaction with the laboratory community that is being evaluated
- Complaint process is viewed as punitive to people who express concerns

- **Recommendation**

- Develop a written communication plan, including a revised feedback process
- Interact with program clients regularly
- Reinvigorate ELTAC

NEXT STEPS

- **ELAP has already begun to address these issues**
 - The Panel is impressed by the new management team
 - The State Water Board seems committed to support them
- **Starting in January, ELAP will provide the Panel with bimonthly webinar progress reports**
 - Opportunity for the Panel to provide guidance
 - These webinars will be open to the community
- **Early 2017: The Panel will hold a multi-day in person meeting to formally assess ELAP's progress**
 - This will be followed by another presentation to the State Board