

FINDINGS FROM THE ENVIRONMENTAL LABORATORY ACCREDITATION PROGRAM (ELAP) REVIEW PANEL



Presentation to 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 about 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 Division of Drinking Water
- **With the move, the State Board desired a comprehensive independent review of the program**
 - There were many complaints about the program
 - SCCWRP was requested to facilitate the review

EXPERT REVIEW PANEL

- **We recruited five leading experts in the field**
- **We empaneled a Stakeholder Advisor Committee**
 - Assisted in selection of Expert Panel members
 - Helped define the Panel charge questions
 - Jointly developed agenda for the Panel meetings
- **The review was established as a two part process**
 - First round of review took place starting in March 2015
 - The Panel produced their report in October 2015
- **Second round took place last month**
 - The Panel returned 16 months later to assess whether ELAP has been responsive to their Year one suggestions
 - To also assess whether further mid-course corrections were needed

FINDINGS FROM ROUND 1 (OCT 2015)

- **California's Environmental Laboratory Accreditation Program is 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 labs that operate cross-state
- **Major deficiencies**
 - Lacks an effective accreditation process
 - Unqualified staff
 - Absence of a robust management system

RECOMMENDATIONS FROM 2015 REVIEW

- **Establish a management system**
 - Create employee expectations and performance metrics
- **Adopt laboratory accreditation standards**
 - Develop a clear set of standards by which laboratory are evaluated
- **Ensure relevant analytical methods**
 - The list of analytical methods for which ELAP accredits is outdated
- **Expand resources**
 - Invest in staff development and electronic support tools
- **Enhance communication**
 - Hold regular client meetings to better understand their needs

ROUND 2

- **Three day meeting held at SCCWRP last month**
 - First day was for information gathering
 - Second two days were deliberation
- **Morning presentations were by ELAP leadership**
 - What they have accomplished in the past 16 months
- **Afternoon was stakeholder perspectives about ELAP**
- **Panel was also provided almost a thousand pages of supporting documents**
- **Presentations and supporting material are available on Panel web site**
 - www.sccwrp.org/elap

MAJOR PROGRAM CHANGES

- **Adopted a management system**
 - Created standard operating procedures and employee expectations
 - Have had 30% employee turnover as a result
- **Restructured ELAP**
 - They now have separate auditing, performance evaluation and enforcement units
- **Increased staff training**
 - About to award a \$1.5 M training contract
 - Three parts: Classroom training, shadowing of experts, being shadowed
- **Selected a laboratory accreditation standard**
- **Increased communications with stakeholders**

INCREASED STAKEHOLDER COMMUNICATIONS

- **Rebuilt their technical advisory committee (ELTAC)**
 - Met seven times in 2016
 - Several SCCWRP member agencies sit on ELTAC
- **Formed a new client advisory body**
 - Representatives from the state agencies ELAP serves
 - Also met seven times in 2016
- **Established communications with the broader stakeholder community**
 - Web site
 - Newsletter
 - Webinars

HAVE THESE CHANGES MADE A DIFFERENCE?

- **Creation of a PT Unit has made a big difference**
 - About 40% of laboratories were not completing required tests
 - About 10% of the PTs had failures
 - ELAP has denied certification requests for approximately 800 analyses to 45 laboratories since September 2016 as a result
- **Creation of an enforcement unit also made a difference**
 - They received 31 referrals and conducted 25 investigations, including 12 unannounced site visits
 - Those investigations have resulted in 18 actions
 - ELAP had not taken a single enforcement action in previous 20 years
- **However, a backlog still exists**

DRINKING WATER LABORATORY BACKLOG

- **Required to be done every three years**
- **313 laboratories are current**
- **41 laboratories are not current**
 - 18 are over 3 years
 - 14 are over 4 years
 - 9 are over 5 years

NON-DRINKING WATER LABORATORY BACKLOG

- **There is no timing requirement for assessing non-drinking water laboratories**
 - But ELAP wants to do those every three years as well
- **147 are current**
- **144 are not current**
 - 88 are over 3 years
 - 35 are over 4 years
 - 21 labs are over 5 years

PANEL ROUND 2 FINDINGS

- **A lot of positives**

- Program was responsive to the recommendations
- Staff are enthusiastic and driven to be the best
- Staff have a help the labs, rather than a gotcha, mentality
- Client relationships have been established and have grown
- Night and day difference in perceived program credibility

- **A lot of tangible accomplishments**

- Management system
- Enforcement unit
- Proficiency testing unit

- **But not all the way there yet**

- Staff still needs extensive training
- The backlog is unacceptable and you are not on a path to solving it

PANEL ROUND 2 RECOMMENDATIONS

- **Develop an implementation process for your standard**
 - There are many steps between selecting and using the standard
 - Key step is providing stakeholders assistance towards a smooth transition
- **Continue to enhance your resources**
 - Need to solve your backlog
 - Create software solutions to resolve some of your inefficiencies
 - Allow for third party auditing
- **Hold another Review Panel in two years**
 - You are on the right path, but have a ways to go
 - An independent assessment will help you determine whether you have realized your vision (or what to do if you haven't)

WHAT DOES THIS MEAN FOR THE SCCWRP MEMBER AGENCIES?

- **Regulators: You should see improved laboratory performance**
 - At a minimum, you will see improved documentation that will make the data more defensible
- **Laboratories: More work**
 - You will have increased documentation requirements
 - More thorough audits and someone will be examining your PT results
 - Hopefully, this will lead to better laboratory performance
- **SCCWRP: Don't be surprised if we get additional participants in our intercalibration exercises**
 - ELAP's clients have pointed to this as an approach they should adopt