

Summary of the A2LA Life Sciences Advisory Committee Meeting
(Saturday, April 4, 2009)

The 38th meeting of the A2LA Life Sciences Advisory Committee (LSAC) was held on Saturday, April 4, 2009 at the Sheraton Columbia Hotel in Columbia, MD.

1. Introduction

M. Miller, Chairperson of the LSAC, opened the meeting by welcoming all attendees and initiating introductions (attendance is listed on pages 10 and 11 of these minutes).

2. Introductions / New members

Attendees and new members of the LSAC were introduced.

3. Review and approval of agenda

M. Miller opened the floor to comments or questions concerning the agenda of the 38th meeting of the LSAC. Two issues were raised.

Motion 1: Move the discussion regarding the CPSC (Consumer Products Safety Commission) to after item 12 and add the FDA (Food and Drug Administration) guidance discussion after item 11. A. Gordon initiated the motion and was seconded by G. Rodrigues. (Motion Passed). [Note: The CPSC discussion actually took place as item 10.]

4. Approval of Last Meeting Summary and Agenda

M. Miller opened the floor to comments or questions concerning the summary of the 37th meeting of the LSAC. None were forthcoming.

Motion 2: Approve the summary of the 37th meeting of the LSAC with no amendments. D. MacLean initiated the motion and A. Liabastre seconded. (Motion Passed)

5. 2008 LSAC Officer Balloting Nomination: Chairman's Report on Outcome of Ad hoc Nomination Committee

R. Brauning announced that the following slate of officers had been proposed by the Officer Nominating Committee: Chairman - G. Rodrigues; First Vice Chairman – J. Morgan; Second Vice Chairman – D. Tholen. Recording Secretary - R. Brauning. M. Miller noted that the bylaws only permit written voting and anyone present today may cast a ballot. M. Miller also noted only 4 paper ballots had been received thus far and encouraged submission of ballots.

6. Report on Status of Task Group Assignments

a. Task group on revision of Veterinary Diagnostic Program requirements

M. Torres provided a summary of the R216 requirements revision process. The revision is complete. R216 is now called the Veterinary Laboratory Accreditation Program. M. Miller thanked M. Torres for chairing the technical committee. Please refer to Attachment 1 for additional details.

b. Task groups on definition and categorization of scope subdisciplines

D. Mettler chaired the task group regarding biological scopes. Chemical scopes were addressed by M. Miller. B. Lane, D. Evanson, A. Gordon, and D. Mettler worked on this alignment process.

Please refer to Attachment 2. A discussion was initiated about the implications for proficiency testing. Several topics were raised including the “decision tree,” aerobic plate counts (e.g. right count on one plate is proficient), and “morphologic determination” (which have a different set of parameters and need more demonstrated competence). Other examples included anaerobic plate counts, MPNs that have screen vs. determination, and PCR (e.g. “validation of quantitative PCR.”)

Qualitative set up and screening produced considerable discussion. Laboratories do not usually put preparation on their scopes. Two questions were raised regarding the level of competence needed regarding screen vs. confirmation and how PT (proficiency testing) could be “married” with the scopes appropriately. The group consensus was that qualitative aspects are difficult to match up with PTs. Many just do the screen and stop.

The consensus was that many different setup types may cause PT to be impractical. A possible rationale for separating setup from screen might be that we have seen different competency in setup (e.g. extractions) that affect the result. RT-PCR (real time polymerase chain reaction) was provided as an example of where preparation could be differentiated because of challenging setups. Labs seemed to concur that different setups create different results. If the laboratory doesn't get the desired end results, the lab can assume that the setup is bad. Including several different techniques could make scopes more cluttered than needed.

The VIDAS (Vitek Immunodiagnostic Assay System) for *Salmonella* and *Listeria* was cited as an example of screens with different setups. For these, the screen is the same but differences exist in the enrichment (media). Therefore, if you run the VIDAS, it doesn't matter what you run on it. Another lab indicated that if the setup is really different, that might need to be captured with respect to PT. Discussion ensued about the different needs with respect to laboratories and customers. Other labs wanted to provide an indication of whether this covers these tests on the scope. There could be different distinctions between food and veterinary purposes (e.g. known vs. unknown end results). It appeared that most members were not in favor of adding setup to PT.

Staff indicated we could have a biological scope, add the columns, and labs can line it up for staff. The scope would have the 4-year plan on it.

Motion 3: Motion to revise the biological scope approach with assistance from staff for PT connection with the scope. A. Liabastre initiated the motion that was seconded by C. Pixley (Motion passed).

Action A: D. Mettler will work with R. Brauninger to evaluate the scope format discussion points and to create a form to address the alignment of PT with the scopes by July 1, 2009 and submit the findings for LSAC review.

c. Task group on LSAC Reference Materials traceability policy: possible revision to address T1 and T9 and non- traceable Reference Materials

G. Rodrigues initiated the discussion about the P102a document. Many life sciences materials are not traceable in the same way. Two major issues exist: stringency and lack of availability. T1 and T9 can appear to be more stringent than standard with respect to calibrations. The LSAC previously took an action item to propose a slight revision to T1 and T9 and draft language for CC (Criteria Council) presentation with a focus on MU (measurement uncertainty) as opposed to intrinsic standards. Several laboratories voiced their opposition to this effort.

It appears the standard addresses consensus standards (e.g., “fundamental physical constants” such as density of water). Section 5.6.2.1.1 of 17025 is the Standard reference. The issue here is that one could buy traceable water, but perhaps labs shouldn’t have to. Intrinsic standards should be accepted for what they are. We also need to look at “chemically pure” standards. NIST (National Institute of Standards and Technology) recognizes the concept of chemically pure standards. Sodium chloride and potassium dichromate are other examples of compounds that could be “intrinsic standards.” Reagent grade classifications (e.g. American Chemical Society reagents) in the pesticide area are an example of a P102a application. If some labs are making their own standards now, we might want to look to modifying T9 instead. T9 can apply to reference materials as written if we wanted it to.

Concerns were raised about force-fitting calibration and testing laboratories together. Calibration and testing laboratories do not appear to communicate effectively. Some thought that, since P102a isn’t in a checklist, it was not brought into the fold. Several individuals indicated that labs may be unaware of updated policies. Perhaps assessors could benefit from a single statement on the existing traceability checklist.

Motion 4: Motion to update existing traceability policy checklist to integrate P102a requirements. A. Gordon initiated the motion and A. Fox seconds.

Motion 4a: Motion to amend Motion 4 to say: “Evaluate the best means to update the C105 Traceability Checklist with the P102a requirements first and then implement the results of the evaluation into C105” because the information transfer into the checklist may become too large and contain criteria nonessential to an audit. Motion initiated and seconded by A. Liabastre. Amended motion passed.

Action B: R. Brauninger will evaluate the process, integrate the P102a requirements as noted above, and then evaluate the results by August 31, 2009.

G. Rodrigues went on to discuss two new developments. First, is the “transition memorandum” that describes when assessors note observations and when they start to cite deficiencies for Category I RMs (reference materials). The memo lessens the urgency of this issue with a fairly long timeline. On July 2, 2009 assessors record observations for Category 1 reference materials not obtained from accredited RM producers. A laboratory noted this approach is distasteful because it doesn’t take into account the different concentrations of RMs (see 2008 minutes regarding EDTA). Labs are confused as to why they would be required to scientifically justify the use of Category III materials. The memo implies that labs will have to continue using exceptions every 2 years. Then, on January 2, 2012 if an accredited RMP (reference material producer) is not available, the same observation will apply.

The point was brought up that often control samples and calibrations use reference materials. P102a talks about process controls and states they are not a problem (transition memo calls this out). Other potential issues brought up by the group included test kits, OEM (original equipment manufacturer) reader plates, USP standards, and pesticides requiring traceable PTs.

Following the group discussion, D. Wright delivered a short presentation about the repository his laboratory accumulates and manufactures. His lab has run a repository since the 1970s when EPA (Environmental Protection Agency) was formed, called the EPA NPSR (National Pesticides Standards Repository). Registrants have to send analytical standards and other information. EPA maintains about 1400 pesticides. The allowable amount is called the tolerance with respect to residue left. Regulatory agencies such as USDA (United States Department of Agriculture), FDA, etc., participate. They carry metabolites with respect to CFR (Code of Federal Regulations) 40 (tolerance). Toxicological significance is also listed. The repository provides samples for any labs that do enforcement work or universities. Such enforcement laboratories appear to be adopting ISO 17025. The repository has instituted environmental controls at various temperature conditions including ambient, refrigeration, and freezers at OEM specifications.

7. DISCUSSION: Life Science Reference Materials traceability databases

M. Moore initiated the discussion regarding NCSL (National Conference of Standards Laboratories) and mentioned they have annual meetings and are a good forum for discussion of RM/traceability issues. Calibration laboratories and testing laboratories need to be more consistent with language and communication.

The BIPM (International Bureau of Weights and Measures, presentation on BIPM website) is what we ultimately trace to. We are traceable to the SI through NIST, not traceable to NIST. The CIPM (International Committee of Weights and Measures) is the international committee that inputs into the BIPM. The KCDB is key comparison database. Appendix B of the KCDB gives the key comparisons. The KCDB (Key Comparison Database) allows comparison with the NIST value and with other international values. This eliminates the NMI hierarchy. We would not expect testing laboratories to look these up, but reference material producers would want to consider this. IUPAC (International Union of Pure and Applied Chemistry) provides input as well.

31 items have been accepted by the NMIs (National Metrological Institutes) and many are under study. The need for worldwide comparisons causes constant changes in this list. The ILAC definition talks about a metrological traceability chain that includes a set of items beyond the concept of pure "metrological traceability." Calibration laboratories refer to the CMC, "Calibration and Measurement Uncertainty." Please note: sources may be on the list provided at the aforementioned website but that might not meet T1 by virtue of not being accredited. Questions were raised regarding what assessors are supposed to check with respect to this database and what is appropriate use of the database. Traceability may exist to an NMI presently, but next year it could be eliminated. See the ILAC (International Laboratory Accreditation Cooperation) requirements in ILAC P10 (beyond metrological requirements such as VIM).

8. DISCUSSION: Application of Equipment Calibration and Verification table

Please see Attachment 3 for the edits described. K. Stoub initiated the discussion to point out particular issues about weights and balances. A reference to OIML (International Organization of Legal Metrology) D10 regarding weights was added to replace OIML D23. The period of calibration is often dependent on

actual use. An important consideration is that weights must come with an endorsed certificate upon initial purchase of the weights and subsequent purchase of re-calibration according to appropriate intervals. Laboratories should perform intermediate checks for commercial calibrations and T9s as appropriate.

Motion 5: To accept the language in updated equipment verification table with respect to weight requirements. K. Stoub initiated the motion and was seconded by A. Liabastre. Motion passed.

Page 3 of the table gives requirements for balances. The point was raised that if you hire a laboratory to simply clean balances, then they would not have to be accredited. A point with respect to uncertainty in T9 was raised. Some labs appeared to be confused about T9c requirements. T9c might need clarification to distinguish it from “service”.

Points were also raised about T9d with respect to the uncertainty of in-house calibrations and that this requirement seemed more stringent than the standard. Others thought we could read T9 either way with respect to the calculation of MU in T9d. Additionally, the term “support equipment” is not defined by NELAC and might benefit from removal. It was pointed out that “support equipment” was not under the scope and was removed.

Action C: G. Rodrigues and M. Torres to investigate wording of T9c and report to the LSAC if changes are needed by August 31, 2009.

Motion 6: To accept wording on the balances as described in attachment 3. Motion initiated by A. Liabastre and seconded by A. Sibille. Motion passed.

Action D: G. Rodrigues will collaborate with M. Miller and R. Brauninger to revise the equipment verification table with respect to T9 requirements by August 31, 2009.

Motion 7: Motion to adopt the amended equipment verification table described in the completed attachment 3. K. Stoub initiated motion and V. Cook seconded. Motion passed.

9. DISCUSSION: Environmental Programs Update

R. Querry initiated the environmental update. It was mentioned that various PT providers have similar anniversary dates, and this resulted in a snowball effect throughout the process. The dates were spread out to accommodate better turnaround times. A2LA is an oversight body in this process. The database is operational and March 1, 2009 the providers have to provide summary data.

DoD (United States Department of Defense) has recognized A2LA for doing ELAP (Environmental Laboratory Accreditation Program) accreditation. This requires 17025, NELAC requirements, and DoD gray boxes. They have to be a U.S.-based AB (Accreditation Body). Four ABs are recognized by DoD in the U.S. A2LA must train its assessors through a webinar. 250 laboratories may be possible in this program until 2010.

10. DISCUSSION: Assessing labs for CPSC Lead testing Requirements; points to consider

T. Ouimet initiated the discussion on this topic by looking for direction from assessors who are dealing with this. The point was raised that for every other program we have had program documents and phase-in periods except for CPSC. Yet, the federal register covers the periods for CPSC. The labs’ concern is that CPSC continually makes changes to the documents. HUD (Housing and Urban Development) has

requirements for lead as well. Some thought that most of the scope change requests were based on confusion. Staff has communicated with the CPSC and they were reluctant to issue firm guidance. A2LA then adopted its own way to represent test methods. Limits are specified in the CFR, and they will go down significantly. CPSC has public meetings about these topics.

Action E: B. Conner to track the federal register and associated comment periods throughout 2009 and report to the group quarterly.

11. DISCUSSION: Assessing labs to flexible/technology-based Scopes; points to consider

Please see attachments 4 and 5. A2LA is working on a way to formally recognize technology-based scopes in R101. The initial stance is that labs in the chemical field only could consider this. Labs could start from a defined scope and then move to a flexible scope as needed. The labs have to justify the need for a flexible scope and demonstrate the management system can accommodate it. The laboratory staff would be required to have appropriate method validation data. Other international accreditation bodies are already taking this approach.

A “tripartite approach” was suggested that allows providing appropriate data upon request for a given matrix. It appears that labs taking this approach are typically government labs with many years of experience to guide this approach. The scopes specify a process that the labs follow.

An example biological scope was broken down into qualitative and quantitative in-house SOPs. For proficiency testing purposes we need to make sure we are not misrepresenting the lab’s competency to the public. The organization has to demonstrate why a fixed scope is too restrictive first. Pathogens might be too broad to align better with the chemical approach. Another example raised was that virus isolation in cells vs. eggs might be different, but that other subdisciplines are the same. Labs commented that the fixed scope is limiting.

Eurochem/CITAC (Consuming Industries Trade Action Coalition) Guide 2 addresses the instrumental process and requires an expert to operate the device and for a process to be in place. A comment was raised that routine testing is different than testing by an expert because an expert would have more QC built in by virtue of experience.

A question was raised as to how we would word the scope for a new FDA method that is developed for an outbreak that lasts 3 weeks. Several assessors indicated this could work for biological scopes. Flexible scopes and fixed scopes could be separate. Yet well-detailed scopes are needed, and both flexible and fixed scopes could be maintained. A2LA could start with a defined scope and add flexible pieces later. Government labs mentioned that the scopes need to capture competency and also take into account certain regulatory requirements as this would be beneficial from regulatory perspectives.

Concerns over diluting the accreditation process, payments, commercial perspectives, and chances for misrepresentation with the two scope formats arose. Staff reiterated that it would be one scope with one field and fee. Flexible scopes would not be for all labs and could include the flexibility reason at the top of the scope. For instance, we could allow flexibility for the matrix and analyte for a common technology. The concept is a partnership based upon AB trust in the customer. Staff thinks flexible scopes will allow more subjectivity. We also need to be sensitive to what regulators are expecting. EA just recently came out with a document on flexible scopes separate from the ILAC document last week.

The consensus was that a fixed scope would be easier to assess and that there would be no separate checklist for a flexible scope. The consensus is that we are going to have a two-part scope. It was mentioned that EA-2/05 gives specific footnoted examples of scopes.

Action F: D. Mettler, M. Miller, B. Stawick., and T. Buffington are to form a task group to look at the EA-2/05 document and report back to the LSAC on their progress by August 31, 2009.

12. FDA guidance discussion presented by G. Salem of FDA office of regulatory affairs

Please see attachments 6 and 7. The presenter mentioned that products are put on import alerts and detained without physical exam. These are re-exported or destroyed. Holders of detained items can submit evidence at a hearing after a private lab tests the products. The FDA has no authority over private labs, only the imported product. This guidance covers sampling and testing.

Someone on import alert status will want to submit analytical evidence. They need to indicate which lab is being used ahead of time to the FDA. FDA is being asked to recognize laboratories and data. Labs don't have to be accredited, but the importers would have to submit a full raw data package for non-accredited laboratories. Accredited laboratories could provide a summary package. FDA typically just sees "negative packages" where violations are not present. Offenders just need to provide evidence of the deficiency cited. For instance, labs can show that FDA can only look for removal of the pesticide cited; however, they do not have to show the package is free of all pesticides. The FDA lawyers said they cannot cite other pesticide offenses after the fact.

It appears we are starting with guidance with ultimate movement to a rule. The present FDA document is a guidance document and will contain "shoulds" and "maybes" because of this fact. If we can't accept the streamlined process outlined in the guidance document we are back to the "full package" and the bottlenecks inherent therein. The paperwork associated with this process tends to preclude using international labs, and the sampling must take place in U.S. There is no point in following the guidance if you have to submit a full package. FDA also tests medicated drugs and feeds for contamination and veterinary drugs for residues in animal tissue. It appears there are fewer problems with a detailed, specific method scope for this FDA application. These standards are coming from FDA lab manuals in terms of documenting collection and sample accountability. Sample integrity appears to be a primary FDA effort.

Some noted benefits of this FDA guidance approach are:

- International recognition: 17011/ILAC MRA (Mutual Recognition Arrangement)
- Consensus guidelines provide a level playing field for everyone
- Voluntary with inducements: this aids laboratories by speeding up process and not restricting trade
- Use of defined scope: this approach supports a defined scope which private industry should have anyway
- Sampling activities recognized: the test laboratory has more control over samples

13. DISCUSSION: Assessing GMP/GLP labs: Do we need different approaches?

a. GMP (Good Manufacturing Practices) Labs that routinely analyze by LC/MS: Can they be accredited by technology rather than by analyte?

b. Issues to consider with Measurement Uncertainty requirements for multi-end point studies using warm blooded animals performed under GLPs

Please see attachment 8. P. Royal gave a presentation regarding the topic. Multi-endpoint studies typically encompass areas such as necropsy, histopathology, etc., primarily with FDA regulation or EPA regulation. Animal drugs and clinical veterinary laboratories, toxicology and medical device studies evaluate a single drug over multiple endpoints. This discussion was limited to animal studies.

Components of uncertainty that affect animal studies include: animal randomization, environmental conditions, calibrations, clinical chemistry and hematology, necropsy, histopathology.

P103b mentions qualitative, semi-quantitative, and quantitative MU categories. P103b provides a note where it identifies a “+, ++, or +++” scoring response gradient that might need to be modified slightly because many of these tests could be re-classified as Category I and II. In summary: MU is challenging when associated with the testing of warm-blooded animals because CRMs are limited, end-results are based upon equipment limitations, and staff training is variable. The current P103b policy may need to be revised to facilitate a consistent application for the assessors who look at these labs

Some group discussions followed that mentioned various topics. Some LSAC members with statistical background stated there were similarities in human clinical trial studies. The consensus was that this forum needs to adjust the note to make it clearer. In general it is tough to look at calculating uncertainty for category 1.

The group could not reach a consensus in this area: some believed the lab should identify the uncertainty, others want the contributors to be identified in terms of the labs, some believed we need to break up the study into its components. Others felt we are concerned with the measurement system and the animal is really not a part of this.

Action G: Form a small group of people to work on revising P103b as needed with respect to the aforementioned MU discussion and obtain feedback from the labs. D. Tholen, K. Black, J. Judieka, D. Archer, and P. Royal volunteered. P. Royal will chair this group and report to the LSAC on progress by August 31, 2009.

Action H: P. Royal will then present the LSAC-approved revisions to the CC for the October 2009 teleconference.

14. DISCUSSION: Update on adoption/possible use of the NELAC Requirements for Field Sampling and Measurement Organizations?

Please see attachment 9. Discussion ensued regarding TNI [The NELAC (National Environmental Laboratory Accreditation Conference) Institute] Standard adopted May 1, 2007. NELAC allowed the standard to languish, and they forgot about it. NELAC has added some ABs and others to the committee recently.

A requirements document and checklist are forthcoming for these requirements. Testing labs can be accredited in two areas. Organizations can be accredited for sampling as well. The documents may be downloaded from the TNI website, www.nelacinstitute.org.

15. Next Meeting: Use of Virtual Meetings? (R. Brauninger)

Many individuals appreciate in-person meetings and also the Criteria Council style teleconferences. Yet, others would like to explore conference calls and webinars. One can share documents virtually throughout the whole web and everyone can see them. Furthermore, A2LA has the capability, but it has not been used fully.

Action I: G. Rodrigues is to ensure that the subgroups report once a quarter and also to ensure minutes of the subgroups are forwarded to the LSAC after the respective meetings. The first summary will be due July 31, 2009.

16. Old/New Business

Adjournment.

Summary prepared by Matthew Torres, A2LA Accreditation Officer.

ATTENDEES

38th Meeting of the A2LA Life Sciences Advisory Committee

(4/4/09)

John Adams	Assessor
Marwa Adly Abdalla Mohamed	Assessor
Denise Archer	Assessor
Anita Bhatt	DOE-ID, LO-RESL
Kelly Black	Neptune and Company, Inc.
Roger Brauning	A2LA Senior Accreditation Officer
Tina Buffington	NVSL, USDA-APHIS-VS-NVSL
Cathy Burns	Food & Drug Administration
Brian Conner	A2LA Accreditation Officer
Vanessa Cook	Tyson Food Safety & Research Laboratory
David Evanson	Silliker Laboratories
Darla Ewalt	USDA
Atefeh Fathi	A2LA Accreditation Officer
Arlene Fox	Assessor
Tessie Gamber	Assessor in Training
Elizabeth Gehman	NBACC/BNBI
Dorothy Gill	Assessor
Amanda Gordon	EG&G Technical Services, Inc.
John Gumper	Assessor
Chris Gunning	A2LA Accreditation Officer
Ada Hensley	Fisher BioServices
Renu Joshi	Assessor
Julie Judeika	NAMSA
Ed Kotsides	Warren Analytical Laboratory
Brian Lane	FL Department of Agriculture
Steve Lerman	Assessor
Albert Liabastre	Assessor
Marilyn Lueck	MicroBioLogics, Inc.
David MacLean	Assessor
Patricia Maldonado	Assessor in Training
Dawn Mettler	Assessor
Ken Middlebrook	Assessor in Training
Mitzi Miller	Assessor
William Mills	Assessor
Marlene Moore	Assessor
Judy Morgan	Environmental Science Corporation
Bertha Munguia	Assessor
Tom Ouimet	Assessor
Gail Parker	FL Department of Agriculture
Ron Peters	Assessor
Charles Pixley	USDA FSIS LQAD
Randy Querry	A2LA Accreditation Manager
Heidi Redlon	Artel, Inc.
George Rodrigues	ARTEL

Pat Royal
Christopher Rucinski
James Scott
Liz Selby
Richard Sheibley
Arlyn Sibille
Brad Stawick
Gina Steiner
Ken Stoub
Danette Then
Dan Tholen
Matthew Torres
Dallas Wright, Jr.

Assessor
Resource Technology Corporation (RTC)
Assessor
A2LA Accreditation Officer
Assessor
Assessor
Assessor
Jones Dairy Farm
Assessor
MicroBioLogics, Inc.
Assessor
A2LA Accreditation Officer
Office of Pesticide Programs

Total Number of Attendees: 57