

US EPA ARCHIVE DOCUMENT



October 26, 2017

Mr. Daniel Hautman  
Deputy Director, Technical Support Center  
OW, OGWDW, SRMD  
U.S. Environmental Protection Agency  
26 W. Martin Luther King Drive (MS 140)  
Cincinnati, OH 45268

RE: ELAB Suggestions for the Drinking Water Certification Officer's Training Course

Dear Mr. Hautman,

As you are aware, concerns regarding the Drinking Water Certification Officer's Training Course were brought to the attention of the U.S. Environmental Protection Agency (EPA or Agency) by the NELAP Accreditation Council (AC) in December of 2016. Earlier this year, these concerns were brought to the attention of the Environmental Laboratory Advisory Board (ELAB or Board), a standing Federal Advisory Committee Act board that advises EPA. As a result, the Board formed a task group to examine these concerns and determine whether ELAB could advise the Agency on this issue.

The task group met several times and discussed this issue during ELAB's August 2017 face-to-face meeting in Washington, D.C. The task group has further reviewed this topic with the entire Board. This letter summarizes the recommendations that were formulated from these discussions.

ELAB recognizes that this is a complex and important issue. EPA has provided this training for many years, and states and other accrediting bodies rely on this course to provide the training necessary to ensure the technical competence of new assessors and to help maintain the skills of more seasoned staff. Although the value of the training and the excellence of the content are not being questioned, real concerns exist about the accessibility of the course, as detailed in the NELAP AC's December 2016 letter. ELAB members and the communities that they represent share these concerns, and as such, ELAB supports the concerns raised by the NELAP AC. As online access to training and information increases, travel budgets decrease, and the complexity of needs increases for government assessors, contractors and private accreditation firms, there is consensus that an annual in-person training at a fixed location is no longer adequate to meet assessor training needs. Although ELAB recognizes that this issue is further complicated by reduced budgets and constraints on staff time at the Agency, it is critical that the knowledge base at the heart of the current system is not lost.

ELAB appreciates the extra steps that EPA has taken to prepare students for the training and looks forward to hearing about the effects on student performance that this additional preparation has generated. The Board now presents further suggestions for your consideration.

EPA has the timely opportunity to re-evaluate the course in terms of delivery and process to address concerns regarding accessibility, cost constraints and testing. Although maintaining the core on-site training has value, other aspects could be provided remotely, including a review of materials prior to the class and delivery of lectures or other training. Testing, or retesting as necessary, could be offered online with a proctor, perhaps at EPA regional offices or laboratories.

EPA could employ the services of outside groups to help evaluate the format, explore alternative methods of delivery, or provide other training support. The Agency has experienced past success in outsourcing other aspects of laboratory certification, including proficiency testing and other training. The extent to which this could be done in this situation would be determined by the Agency.

The Board also suggests that EPA train a number of trainers (with acceptable authority) who could provide the training or assist with aspects of the training at other locations throughout the country. Training could be offered in conjunction with significant meetings and conferences or at other EPA or state facilities.

Although the interactions between first-time participants and experienced assessors re-attending for refresher training provide benefit, that benefit may be outweighed by current fiscal and travel constraints. One way to economize would be to develop a live, interactive Web-based approach for refresher training. This online training could be abbreviated for seasoned staff who do not need the hands-on portion. Alternatively, EPA could develop a catalog of on-demand, online training modules.

The Board members sincerely hope that this letter validates what EPA already has heard from the laboratory accreditation community and also provides viable ideas to assist the Agency in addressing this matter. If ELAB can provide any additional assistance, information or clarification, please do not hesitate to reach out.

Respectfully,

A handwritten signature in blue ink, appearing to read "Henry Leibovitz".

Henry Leibovitz, Ph.D.  
Chair, Environmental Laboratory Advisory Board

cc: ELAB Board  
Lara Phelps, ELAB Designated Federal Official