



TNI Environmental Laboratory Program- Accreditation Procedure

PJLA offers third-party accreditation services to Conformity Assessment Bodies (i.e. Testing and/or Calibration Laboratories, Reference Material Producers, Field Sampling and Measurement Organizations and Inspection Bodies). This procedure outlines PJLA's accreditation process and criteria administered to conformity assessments bodies performing **TNI Environmental Laboratory (TNI EL) activities. This is a Supplemental Procedure to PJLA's Accreditation Procedure (SOP-1). Both procedures shall be followed for the entirety of this accreditation program.**



TNI Environmental Laboratory Program- Accreditation Procedure

1.0 SCOPE/PURPOSE

The TNI Environmental Standard (s) Volume I and II are designed to assess the competency and capability of environmental and drinking water laboratories. This standard(s) and/or criteria utilized for this program is the TNI Standard Volume 1 2, 3 (2003) and/or (2009) the United States Environmental Protection Agency's (EPA) Manual for the Certification of Laboratory's Analyzing Drinking Water, Fifth Edition.

This procedure includes the process for which PJLA carries out its accreditations in accordance to this program. This also includes specific requirements of applicant and accredited (CABs) wishing to obtain accreditation to The TNI Environmental Standard (s) Volume I and II This appendix only includes this program's specific requirements, which are not found in the body of this document. Criteria outlined in the body of this document will be carried out by PJLA and enforced by PJLA to its (CABs) as well as these requirements as necessary.

2.0 REFERENCES

- 2.1 Management and Technical Requirements for Laboratories Performing Environmental Analysis (TNI-EL-V1-2009)
- 2.2 General Requirements for Accreditation Bodies Accrediting Environmental Laboratories (TNI EL-V2-2009)
- 2.2 General Requirements for Environmental Proficiency Testing providers (TNI EL-V3-2009-Rev 2.0)
- 2.3 International Standard ISO/IEC 17011 Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies, September 2004

3.0 PJLA ROLES AND RESPONSIBILITIES TO THE TNI –ENVIRONMENTAL STANDARD ACCREDITATION PROGRAM

PJLA is committed to ensuring timely assessment are conducted in a cost-effective manner, with the regulatory oversight as required by law.

4.0 SUBSTANCE OF THE AGREEMENT

PJLA meets the criteria as outlined in the requirements for this program, in addition to the Management and Technical Requirements for Laboratories Performing Environmental Analysis (TNI-EL-V1-2009), General Requirements for Accreditation Bodies Accrediting Environmental Laboratories (TNI EL-V2-2009), General Requirements for Environmental Proficiency Testing providers (TNI EL-V3-2009-Rev



TNI Environmental Laboratory Program- Accreditation Procedure

2.0) and International Standard ISO/IEC 17011 Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies, September 2004.

4.1 MANUAL/ORGANIZATION

PJLA maintains a quality manual and standard operating procedures (SOPs) and work instructions to document its quality system to comply with ISO/IEC 17011 and TNI EL-V1, V2 and V3. PJLA will follow its organization procedures as specified in these documents in the removal, suspension or withdrawal of an organization's accreditation status based on the organization's failure to meet requirements of the program on an ongoing basis or at the organization's request.

4.2 TRAINING AND QUALIFICATION

PJLA maintains a training, qualification and on-going continuing education program for assessors based on the requirements outlined in ISO 17011:2004, the TNI EL-V1 and V2 standards and the EPA Manual for the Certification of Laboratory's Analyzing Drinking Water, Fifth Edition Criteria. New and experienced assessors are required to meet the requirements contained in this document. PJLA will also recognize appropriate training conducted by federal, state, or local entities, academic/educational institutions or qualified private organizations.

4.2.1 Laboratory assessors shall hold at least a Bachelor's degree in a scientific discipline or have commensurate experience acquired by having performed verified assessments of environmental CABs. An assessor shall have completed and attained a passing score on the written examination of courses on assessing quality systems and all technical disciplines comprising a technology or combination of method and technology that the assessor will assess.

NOTE: Technical disciplines applicable to the environmental sector include microbiology, toxicity testing, inorganic non-metals, metals, organics, asbestos, radiochemistry, and field activities.

4.2.2 Assessors shall sign an LF-130 attesting that they meet the education and training required above. PJLA shall provide these statements to (CABs) upon request.

4.2.3 Assessors shall have performed a minimum number of assessments under the supervision of an assessor whose competence has been qualified by PJLA. The qualified assessor shall observe the candidate assessor performing:



TNI Environmental Laboratory Program- Accreditation Procedure

- a) at least one assessment, for those assessors that have previous documented experience performing environmental (CAB) assessments; or
- b) at least two assessments, for those assessors that have no documented experience performing environmental (CAB) assessments.

NOTE: A qualified assessor may evaluate the ability of an assessor to perform unsupervised assessments by: direct observation, observing the assessor perform an assessment in its entirety; or by limited observation, observing the assessor performing parts of an assessment and allowing the assessor to conduct some parts of the assessment independently.

- c) Supervised assessments will be documented on an LF-100 Evaluation form as outlined in SOP-2 PJLA Personnel Procedure.

4.2.4 Annual refresher training will be provided to address (for example): regulations; accreditation processes and procedures and requirements; records and documents; data analysis, reduction and reporting; sampling and measurement methods and techniques; and other topics to improve assessment and communication skills.

4.2.5 All qualifications and training will be documented in the assessor files.

4.3 STANDARDS OF PROFESSIONAL CONDUCT OF ASSESSORS

4.3.1 Assessors and experts shall conform to professional and ethical standards of conduct. Assessors and experts shall:

- a) have no interests at play other than those of PJLA during the entire accreditation process;
- b) act impartially and not give preferential treatment to any organization or individual;
- c) provide equal treatment to all persons and organizations regardless of race, color, religion, sex, national origin, age, and disability;
- d) not use their position for private gain;
- e) not solicit or accept any gift or other item of monetary value from any (CAB), (CAB) representative or any other affected individual or organization doing



TNI Environmental Laboratory Program- Accreditation Procedure

business with, or affected by, the actions of the assessor's employer or accreditation body;

f) not hold financial interests that conflict with the conscientious performance of their duties;

g) not engage in financial transactions using information gained through their positions as assessors to further any private interest;

h) not seek or negotiate employment or attempt to arrange contractual agreements with a (CAB) that would conflict with their duties and responsibilities as assessors;

i) not knowingly make unauthorized commitments or promises of any kind purporting to bind PJLA.

j) attempt to avoid any actions that could create the appearance that they are violating any of the standards of professional conduct outlined here above

4.3.2 Assessors that become aware that the (CAB) may be in violation of an environmental law or regulation shall inform PJLA of the situation and provide documentary evidence for PJLA to take appropriate action.

4.4 ASSESSMENT DOCUMENTATION

4.4.1 PJLA will perform on-site assessments of organizations' quality system to include the general ISO/IEC 17025, TNI EL-V1, EL-V2, EL V3. Assessment material will include the following at minimum:

- a) Checklist covering the entire TNI EL-V1 Standard and other program specific requirements
- b) A preliminary and final assessment report
- c) Attendance Sheet with members participating in the opening and close of the assessment
- d) Nonconformity reports and evidence of closure
- e) Proficiency Testing Results
- f) Other data to support the assessment
- g) Appraisal Form



TNI Environmental Laboratory Program- Accreditation Procedure

4.4.2 The assessment teams shall provide or make available the following types of documents before a scheduled announced on-site assessment or before the conclusion of the on-site portion of the (CAB) assessment:

a) **Assessment Confidentiality Notice:** a document advising the (CAB) that it has the right to declare information gathered during an assessment as confidential business information according to procedures established by the accreditation body or to restrict access to information requested during an assessment when such information directly affects national security. PJLA will utilize (SOP 10) Dispute and Appeal procedure for processing and evaluating claims made by (CABs) of confidential business information (CBI) referencing applicable laws and regulations.

b) **Checklists:** any standard forms that the assessment team will use to evaluate conformance with the standard to document assessment findings.

c) **Assessment Appraisal Form:** a document used by the accreditation body to obtain feedback from (CABs) about the adequacy and the effectiveness of the assessment process, including the performance of the assessment team.

d) **Notice of Announced Assessment:** an appointment letter, electronic mail message or a published schedule informing the (CAB) about an upcoming assessment and identifying members of the assessment team with sufficient time to allow for potential objections from a (CAB) to members assigned to the assessment team.

4.5 ACCREDITATION INTERVAL/CYCLE

Assessments will be conducted annually consisting of an initial assessment, surveillance and a reassessment. All (CABs) shall be fully reassessed every two years. In certain circumstances reassessments can occur 6 months prior or after the reassessment due date. Routine assessments will be announced to (CABs) in accordance to this procedure. However, PJLA has the right to conduct assessments unannounced when necessary. Since these assessments are unannounced the (CAB) may object to the assessment team upon their arrival. PJLA will handle these situations as they arise and deem whether the (CABs) objection of an assessor or team is reasonable and reassign assessors as necessary. However, at no such time is an objection to conduct an unannounced assessment from the (CAB) acceptable.



TNI Environmental Laboratory Program- Accreditation Procedure

4.6 ASSESSMENT PROCESS

4.6.1 Application Process

PJLA will review all applications received for this program and determine the appropriate amount of assessment time and qualified assessment teams. All cost estimates will be provided directly to the (CAB) for consideration within a reasonable number of contiguous working days.

4.6.2 Conduct Assessments

All assessments will be conducted in accordance to the specified standard (i.e. TNI EL V-1 (2003) (2009)). Assessments will include the assessment of the standard in its entirety including the assessment of all Fields of Accreditation (Matrix-Method Analyte combinations) for which the (CAB) holds accreditation.

4.6.3 Assessment Reporting

An assessment report will be developed from the assessment team consisting of requirements as outlined in PJLA criteria and TNI EL-V2 criteria. Nonconformities shall be documented against the applicable standard requirement and as necessary against the adherence to accredited test method specifications. A preliminary assessment report including the determinations of potential findings shall be left at the closing meeting. A final assessment report will be issued within 30 days of the assessment once all findings are confirmed. No assessment reports will be released to the public until all reports and nonconformities have been finalized.

4.6.4 Post Assessment Activities

(CABs) will be required to respond to nonconformities within 30 calendar days from the receipt of the final on-site report. Responses shall include a plan of correction (i.e., corrective action plan) for each nonconformity identified in the on-site assessment report.

4.7 GRANTING OR DENIAL OF ACCREDITATION

Upon final approval by the assessment team all assessment material will be reviewed by PJLA's Executive Committee. This committee is independent from the assessment team and impartial to the (CAB's) activities. Upon approval of the committee a certificate will be granted including an issue date, expiration date, test matrices, test methods, technology and applicable analytes. Certificates will be maintained on the PJLA website



TNI Environmental Laboratory Program- Accreditation Procedure

of accredited laboratories www.pjlab.com and on a National Database once established

Denial of accreditation may occur for the following situations:

- a) failure to submit a completed application;
- b) failure to pay fees;
- c) failure of (CAB) staff to meet the personnel qualifications of education, training, and experience as required by the Standard;
- d) failure to successfully analyze and report proficiency testing samples as required;
- e) failure to respond to an assessment report from an on-site assessment with a corrective action report as required;
- f) failure to implement the corrective actions detailed in the corrective action report within the required time frame.
- g) failure to implement a quality system as defined in TNI Environmental Laboratory Sector Volume 1, Module 2 "Management and Technical Requirements for Laboratories Performing Environmental Analysis";
- h) failure to pass a required on-site assessment(s);
- i) misrepresentation of any fact pertinent to receiving or maintaining accreditation; and/or denial of entry during normal business hours for an on-site assessment.

No CAB's accreditation shall be denied without the right to due process.

4.8 SUSPENSION, WITHDRAWAL AND REDUCTION OF ACCREDITATION

PJLA has a policy for the Suspension, Withdrawal and Reduction of Accreditation (SOP-13), available on the PJLA website. In addition to this general policy (CABs) under this program will have the following requirements placed upon them in association to this process.

Suspension shall not exceed six months or the period of accreditation, whichever is longer. Subject to applicable laws, regulations and due process requirements, PJLA may suspend, withdraw or reduce a (CAB's) accreditation if the (CAB) fails to meet the standards for accreditation. The (CAB) shall retain accreditation for the scope of accreditation, where it continues to meet the requirements of the Standard.

Reasons for suspension, withdrawal or reduction shall include but are not limited to:

- a) if PJLA finds, during the on-site assessment, that the public interest, safety or welfare imperatively requires emergency action;
- b) failure to complete proficiency testing studies as required;
- c) failure to notify PJLA of any changes in key accreditation criteria



TNI Environmental Laboratory Program- Accreditation Procedure

- d) failure to maintain a Quality System as required;
- e) failure of the CAB to employ staff that meets qualifications for education, training and experience as required.
- f) Misrepresentation of any fact pertinent to receiving or maintaining accreditation;
- g) Denial of entry to PJLA's assessment team during normal business hours for the purpose of conducting an on-site assessment;
- h) Failure to pass an on-site assessment conducted by PJLA;
- i) Failure to complete responses or corrective actions from PJLA's assessment report or for PT failures
- j) Failure to pay fees

While suspended (CABs) shall not continue to perform conformance assessment services for the affected scope of accreditation and represent them under this program. PJLA shall change the (CAB's) accreditation status from suspended to accredited when the (CAB) demonstrates that it complies with the relevant requirements. A suspended (CAB) shall not have to reapply for accreditation if the cause/causes for suspension are corrected within six months or before the end of the period of accreditation, whichever is longer. If the (CAB) fails to correct the causes of suspension within six months after the effective date of the suspension or by the end of the period of accreditation (whichever is longer), PJLA shall withdraw or reduce the (CAB's) accreditation and the (CAB) is required to reapply for accreditation. No (CAB's) accreditation shall be suspended, withdrawn or reduced without the right to due process as set forth by PJLA.

Suspension shall not exceed six months or the period of accreditation, whichever is longer. Subject to applicable laws, regulations and due process requirements, PJLA may suspend, withdraw or reduce a (CAB's) accreditation if the (CAB) fails to meet the standards for accreditation. The (CAB) shall retain accreditation for the scope of accreditation, where it continues to meet the requirements of the Standard.

PJLA will immediately revoke applicable test methods/analytes for which a PT was not conducted in accordance to the standard or if results from another CAB is submitted as evidence of compliance.

4.9 PROFICIENCY TESTING REQUIREMENTS

CAB(S) shall conform to PJLA's Proficiency Testing Policy PL-1, TNI EL- V1M1 and TNI EL-V2 M2 These will be assessed and monitored by PJLA continually, including on-site assessments.



TNI Environmental Laboratory Program- Accreditation Procedure

4.9.1 PROFICIENCY TESTING REQUIREMENTS (ACCREDITATION BODY PROCESS)

4.9.1.1 PJLA's PT program requirements are listed below. (CABs) will be monitored in accordance to this procedure along with the requirements outlined in (PL-1) PJLA Proficiency Testing Policy.

4.9.1.2 PT information shall be retrieved from approved PT providers for this program. For instances where the approved PT providers cannot perform particular studies, then the (CAB) should refer to PJLA's policy PL-1 for conducting other means of PT. Approved PT providers can be located on the The Nelac Institute website.

4.9.1.3 PT providers should be notified to submit results to PJLA directly to the following email address pt@pjlabs.com. Results shall be submitted in an excel.csv format or it will not be accepted. Upon receipt of the PT data, PJLA will create a unique client PT tracking sheet utilized internally to monitor the standard requirements. Data received will be entered along as the information received is dated within 18 months including data no more than 6 months from the scheduled assessment. The analysis will start upon the receipt of at least 2 studies of the FoPT. In the case PT failures are found, then PJLA will highlight this area as an indicator that a third PT round is pending. If failures are still detected upon receipt of the third PT round then PJLA will 1) not grant accreditation until a passing PT is completed meeting the 2 out of 3 requirements, 2) remove items off the scope of accreditation 3) notify any secondary accreditation body as applicable that relies on PJLA's evaluation of (CABs) PT results. PT results will be evaluated to determine accreditation status, no more than 60 days from the receipt of the final evaluation report for each study with a non-acceptable status. PJLA will consider the PT acceptable when a "acceptable" status is received from the PT provider. PJLA will consider the PT unacceptable when the following occurs:

1) a "non-acceptable" status is received. However, in regards to section 7.3 (a), PJLA has the right to overturn "unacceptable" results when it is found that the result meets the criteria in *EL-V3, Section 10.0*, which states the following:

If the assigned value is greater than "0" the numerical value reported shall be evaluated "Acceptable" if it is within the established acceptance limits and evaluated "Not Acceptable" if the numerical value reported is outside the established acceptance limits or the numerical value is reported with a



TNI Environmental Laboratory Program- Accreditation Procedure

less than (<) sign and the numerical value is less than the lower acceptance limit.

Examples are as follows:

If the Assigned Value is "10.0", the lower acceptance limit is "5.00" and the upper acceptance limit is "15.0".

a) Any reported numeric value between 5.00 and 15.0 shall be evaluated "Acceptable"

b) Any reported numeric value greater than 15.0 shall be evaluated "Not Acceptable".

c) Any reported numeric value less than 5.00 shall be evaluated "Not Acceptable".

d) Any numeric value reported with a less than sign (<) shall be evaluated "Acceptable" if the reported numeric value associated with the less than sign is equal to or greater than the lower acceptance limit. In this example, a reported value of '< 5.00' shall be evaluated as "Acceptable" because 5.00 is equal to the lower acceptance limit.

e) Any numeric value reported with a less than sign (<) shall be evaluated "Not Acceptable" if the reported numeric values associated with the less than sign is less than the lower acceptance limit. In this example, a reported value of '< 4.99' shall be evaluated as "Not Acceptable" because 4.99 is less than the lower acceptance limit.

If the Assigned Value is set to the PTRL with a less than sign (<) or set to "0", any numeric value reported with a less than sign (<), a reported value of "0" or a reported numeric value less than the PTRL shall be scored "Acceptable".

For example, if the assigned value is set to "< 2.50" and 2.50 is the PTRL associated with a less than sign (<):

a) Any reported numeric value reported with a less than (<) sign shall be evaluated "Acceptable".

b) A reported value of zero "0" shall be evaluated "Acceptable".

c) A reported numeric value between "0" and 2.50 shall be evaluated "Acceptable".

d) A reported numeric value greater than 2.50 shall be evaluated "Not Acceptable".

A reported value shall be evaluated as "No Evaluation" if it cannot be evaluated (e.g., alpha characters for a quantitative test).



TNI Environmental Laboratory Program- Accreditation Procedure

*Analytes included in a PT sample but not reported by the laboratory shall be evaluated as “Not Reported”.
If the PT Provider invalidates an analyte in a PT study, all evaluations for data reported for that analyte shall be “No Evaluation” and a discussion of the situation leading to the invalidation shall be included in the final report to participant labs and ABs.*

- 2) the (CAB) does not report results for an accredited FoPT within the required timeframes in the EL Volume 1 Standard.
 - 3) The (CAB) makes any reporting error or omission that results in a non-specific match between the analytical result for the FoPT and any criterion that identifies the laboratory or the field of accreditation for which the PT sample was analyzed for the purpose of initial or continued accreditation
 - 4) the (CAB) submits analytical results for a FoPT from a PT provider that is not accredited by the PTPA unless there are not any PTPA-accredited PTP for the FOPT in which case the PT sample may be purchased from any PTP approved by PJLA
- 4.9.1.4 PJLA will make every effort to contact the PTP for general questions or concerns from both PJLA and our CABs in regards to PT data or when the validity of the PT may be questionable as related to complaints or failure rates received from CABs. If the PTP is non-responsive, then the PTP’s AB will be contacted for resolution. (CABs) have the right per PJLA’s dispute and appeal procedure (SOP-10) to dispute the decision of PT results when PJLA is in agreement with the PT provider.
- 4.9.1.5 In order to continue accreditation the similar passing criteria will remain. Additionally, CABs shall successfully analyze at least two (2) TNI-compliant PT samples per year for each accreditation FoPT for which the CAB holds accreditation. However, continuous data submitted shall be within 5 months apart not exceeding 7 months, in order to meet the minimum of 2 PT studies within a 6 month requirement. Certain exceptions will be made if the laboratory is conducting a PT relative to a corrective action study or to reinstate accreditation for a certain field. However, for these instances the studies shall be within 15 days apart from each other. In some cases (CABs) may be involved with experimental FoPTs in which they are only required to conduct a PT on one sample within 6 months, twice per year. However, (CABs) should utilize other means of PT as outlined in PJLA’s PT Policy in order to meet the minimum of 2 PT studies within a 6 month requirement.



TNI Environmental Laboratory Program- Accreditation Procedure

4.9.1.6 PJLA will allow a (CAB) to withdrawal from a PT on any FoPT on or before the close of study. However, this will not exempt the laboratory from meeting the semi-annual analysis criteria required for continued accreditation.

4.9.1.7 PJLA will contact (CABs) 14 days prior to the due date of PT submission as a courtesy to remind them of their obligation. PJLA has the right to suspend or revoke (CABs) certificate for failure to follow the requirements for PT or to appropriately take corrective action for PT failures. Any change of accreditation status will be published on the PJLA website and any (ABs) providing secondary accreditation based on our accreditation assessment will be notified of this change.

4.9.2 PROFICIENCY TESTING REQUIREMENTS (ACCREDITATION ASSESSMENT PROCESS)

4.9.2.1 The master sheet for each (CAB) will be provided to the assessment team prior to the assessment. During the assessment, the assessors will sample the actual PT reports and the (CABs) process for conducting PT studies. Assessors will ensure the following is adhered to:

- a) PT samples are tracked through the (CAB) in the same manner as routine samples
- b) PT samples are prepared according to the PT provider's instructions and subsequently handled as routine samples
- c) PT samples are analyzed under the same analytical conditions and instrument calibrations as used for routine samples
- d) Ensure that the type, composition, concentration, and frequency of quality control samples analyzed with the PT samples are the same as with routine samples
- e) PT samples are not analyzed multiple times unless routine samples are analyzed multiple times and results from multiple analyses are calculated in the same manner as routine
- f) Procedures are in place for the analysis of environmental and PT samples when the concentration range of the samples is outside its normal range of measurement
- g) Ensure that the (CAB) has performed corrective action for an unacceptable evaluation received from the PT provider for any FoPT

4.9.2.2 In the case the (CAB) analyzes the same PT sample using different technologies and/or multiple test methods for any FoPT and receives an unacceptable score then the (CAB) shall consider this a failure for all methods involved with the analysis.



TNI Environmental Laboratory Program- Accreditation Procedure

4.9.2.3 If in the course of the assessment , the assessor finds that the PT provided to the (CAB) contains evidence that the provider directed the laboratory to purchase related QC standards that are specifically designed for the PT sample or that the PT provider has given the (CAB) analysis instructions beyond those specified in the EL standard, then the assessor should notify PJLA immediately to inform the PT provider accreditation body.

4.9.3 PROFICIENCY TESTING CORRECTIVE ACTION REQUIREMENTS

4.9.3.1 When a (CAB) has unsatisfactory results for FoPT a corrective action will be required for each field. (CABs) shall submit corrective action within 30 days of the identified issue directly to PJLA headquarters. (CABS) may utilize sample PTs as evidence of corrective action as long as it is obtained from an approved PT provider. The (CAB) shall inform the PT provider that the requested study is for corrective action studies in order to ensure the provider sends a sample that meets the requirements for supplemental PT samples as specified in the TNI EL Volume 3 standard. The study shall be at least fifteen calendar days between the closing date of a previous study and the analysis date of any subsequent study for the same FoPT. The subsequent sample shall be analyzed and reported in accordance with the requirements set within TNI EL Volume 2 and specified in section, Appendix E, 4.9.2 of this procedure.

Upon successful completion of corrective action and receipt of passing FoPT, the (CAB) suspension will be lifted and the applicable tests will be added back on the scope of accreditation.

4.10 RECORD RETENTION (RECORDS)

PJLA currently retains records from three (3) to five (5) years minimum depending on the record. Records shall be maintained for longer periods based on specific state, federal or regulatory requirements.

4.11 DELEGATION (SUBCONTRACTING OF ASSESSMENT ACTIVITIES)

PJLA will not delegate (whole or in part) the responsibility of (CAB) assessments to another organization.

4.12 PARTICIPATION & MAINTENANCE WITH THE TNI NELAP NON-GOVERNMENTAL PROGRAM

PJLA will participate with TNI for this program including attending on-going meetings and committees. PJLA will volunteer as necessary and delegate a TNI NGAB evaluator to support this program.



TNI Environmental Laboratory Program- Accreditation Procedure

4.13 CONFLICT OF INTEREST/CONFIDENTIALITY

PJLA has the appropriate conflict of interest and confidentiality agreements for all assessors and staff identified under PJLA's accreditation program. If at any time staff members of PJLA should impose any detrimental success to the program, then those staff members (employees or subcontracted employees) will be replaced with another member of equal and superior qualification.