Laboratory Ethics

Drinking Water Program
Good Laboratory Ethics Mean

- A Laboratory reports only sample results which meet all compliance criteria or properly qualifies all results not meeting all compliance criteria.

- Cradle to grave process.
A Breach in Ethics is

- Any “deliberate” action or inaction allowing sample results to appear as meeting all applicable compliance criteria when they do not.

- A Certified laboratory must qualify all sample results not meeting all compliance criteria.
Back in the Day

It used to be rumored there was something called laboratories of choice. Where you took your samples and got the results you wanted. The laboratory conspired with the client, to keep the client in regulatory compliance.

In today’s world there is another name its called co-defendants.
I’m looking for breaches in ethics every time I’m conducting an inspection.

The U.S. EPA Region 5 has become much more active in this area.

The U.S. Environmental Protection Agency Office of the Inspector General is always looking for leads.
Breaches in Ethics Include

- Sample collection problems not noted on Report.
- Peak shaving /Peak addition
- Time traveling
- Dry labs
- Inappropriate procedures
- Shortcuts
- Anything imaginable
What's a laboratory to do?

- Develop a ethics policy and add it to the laboratory’s quality assurance manual.
- Develop and implement an ethics training program for laboratory analysts.
- Develop a fraud detection and deterrence program
Laboratories are encouraged to have an ethics policy and implement a fraud detection and deterrence policy/program, including use of the following, as appropriate:

- Use data validation and verification techniques; and
- Use analyst notation and sign-off on manual integration changes to data.
Deterrence

- Individual analyst log-in for instrument operation and data entry
- Turn all computer and software audit trails on
- Known penalties for non-compliance
- Method training and adherence to the laboratory standard operating procedures and the promulgated method
- Computer times synced with a server
Detection

- Strong QC program with complete data review
  - QC summary sheet review with transcriptions review
  - Periodic data package review including electronic file reprocessing.
  - Checking for out of sync data files

- Review of all audit trails and manual integrations
Lab Ethics:
– What kind of policies/ethics statements should labs have in place?
– What are the proper ways to handle ethics issues that arise in the lab?
– What’s the best way to counter “We’ve always done it this way?”
Contact Information

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