To: Dr. Erika Paterson, Instructor  
From: Samantha Langley, R.V.T.  
Date: October 6, 2016  
Subject: *Proposal for Determining the Cause of the Upward Trend of Non-Conformance Incidents seen in the 2015 – 2016 racing season at Fraser Downs*

**Introduction**To protect the betting public from fraudulent practice, the Canadian Pari-Mutuel Agency (CPMA) created the Equine Drug Control Program (EDCP) to prevent and detect the illegitimate use of drugs in race horses. Sections of the Criminal Code and the Pari-Mutuel Betting Supervision Regulations are directly linked to the EDCP and any results may be used for judicial purposes.

Racing Forensics has been selected to administer the EDCP on-site collection at race tracks across Canada. Due to the legal nature of the practices carried out at collection sites, any instances of non-conformance are a serious matter.

As of the 2016-2017 racing season, events of non-conformance will also now have financial implications against Racing Forensics; CPMA will no longer compensate Racing Forensics for sample or shipment non-conformance events. Sample leakage, missing samples, incorrect labelling or incorrect sample shipping procedures are examples of non-conformance events that will result in a loss of pay to Racing Forensics.

**Statement of Problem**During the last three months of the 2015-2016 racing season, a significant number in non-conformance events occurred at the Fraser Downs location; six in total. Prior to this, only one event of non-conformance was reported over the course of four-months. With the start of the 2016-2017 racing season upon us, determining the cause of these events is of priority to avoid any financial implications for Racing Forensics and to protect the integrity of the EDCP program at the Fraser Downs Race Track.

**Proposed Solution**Many of the non-conformance events that I have seen occur are ones that have been explicitly stated in either the SOPs or in memos. I feel it is important to identify if these documents are not clearly written or not being made readily available to staff.

**Scope**  
To determine the potential cause(s) for this increase of non-conformance events, I will be examining areas of inquiry:

* What are the most common types of non-conformance?
* Is there a correlation of a particular staff member and occurrences of non-conformance?
* What practices has the Chief Test Inspector implemented for sample quality control and staff compliance?
* Is there a training program in place for Test Inspectors and if so, how is staff competence evaluated?

**Methods**  
Primary data used in this investigation will come from the quarterly reports produced by Racing Forensics, notifications of non-conformance from the appointed laboratory, and observations made by myself at the Fraser Downs racetrack during racing hours. I would also like to interview current staff members to determine if there are any areas of the Standard Operating Procedures manual that are not written in a clear manner.

**My Qualifications**  
As a Registered Veterinary Technician for Racing Forensics of two years, I am aware of the standard operating procedures expected for collection of official samples. I also have been made aware of the current concerns regarding non-conformance for official samples and have access to past and current occurrence reports. My current role as EIPH technician will allow me to objectively observe the Test Inspectors’ performance of collection procedures. I also understand the legal importance of these meticulous procedures as described in the Canadian Criminal Code.

**Conclusion**The sudden rise of non-conformance events seen at the end of the season not only has legal ramifications but financial consequences as well. The root cause needs to be identified promptly early in this new season to maintain the high standards of the EDCP as set out by the CMPA. By examining the four areas of inquiry mentioned previously, I will be able to identify deficiencies in current practices contributing to the increased frequency of non-conformance events. With your approval, I will begin investigating this matter at once.