30-Dec-19
ANSI/ASB

Standard for Validation of Probabilistic Genotyping Systems

Note: a specific Proposed Resolution must accompany each comment or it cannot be considered.

#	Section	Type of Comment (E Editorial, T-Technical)	Comments	Proposed Resolution	Editor or Working Group Review	Final Resolution
1	Annex A-Requirement 4.5	E	Last sentence refers to developmental validations, but standard 4.5 discusses internal laboratory validation and performance check studies. Also, the sentence reads as if the laboratory has to make their own summary statement about the developmental validation. Think the intent of the sentence was for the lab to have access to the developmental validation.	Move last sentence to a new section under Annex A for either requirement 4.1.1, 4.1.2, or 4.1.3. And rephrase: "Laboratories shall retain a copy of the developmental validation, to include a summary of the sample types used during the developmental validation."	Reject: All documentation of document retention for internal validation is within 4.5 and the working group is of the opinion this requirement is best suited to be in this section.	Reject: All documentation of document retention for internal validation is within 4.5 and the working group is of the opinion this requirement is best suited to be in this section.
2			It would be hard to overstate the need for this standard given that forensic labs across the country either have already adopted or are currently working to implement probabilistic genotyping for intepretation of casework samples. This standard establishes foundational requirements critical to improve quality. For this reason I vote yes and believe it should be made retroactive. Some gaps persist in the standard however, and these ommissions could affect the reliability of the results produced by the system validated. The revised standard still does not adequately address transparency of methods; separate verification of software (adherence to IEEE standards); and the largely unanswered question of how and when probabilistic genotyping systems differ from one another, recognised as essential in the PCAST report (President's Council of Advisors on Science and Technology, "Report to the President: Forensic Science in Criminal Courts: Ensuring Scientific Validity of Feature Comparison Models").		Reject: This comment has been addressed in previous public commenting rounds and the previous resolutions were approved by the CB.	Reject: This comment has been addressed in previous public commenting rounds and the previous resolutions were approved by the CB.