

ine of Submission of Comments: 16-Mar-20

Document Number: ANSI/ASB Std 024

Document Title: Crime Scene/Death Investigation - Dogs and Sensors Pre-Scented Canines - Location Check

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

#	Section	Type of Comment (E-)	Comments	Proposed Resolution	Final Resolution
44	General Comment	E	The Terminology section is excessively long. Many of these terms are defined in the General Guidelines Standard. Only terms unique to this document are needed.	Only terms unique to this document are needed.	Accept with modification: Several terms were deleted and the reference to TR 025 was added.
45	General Comment	T	The term 'match' is poor, colloquial term misused by the forensic community. The vapor signature of a scented article does not match the target individual. Odor uptake and release of the article is different than the target, so the two do not match. The dog is able to generalize the scent and <i>associate</i> the scented article with the target person.	The term match and target are currently used almost interchangeably in the document. In truth, the scent and target can be associated by the dog.	Accept with modification: Terms were edited to replace match with associate and also the term match was updated throughout the document to read associate.
46	General Comment	E	Once again, organization, agency, individual, individual(s) are used randomly throughout the document.	Paranthenetically define agency, organization, individual as 'organization' or 'organization/individual' and consistently use that term throughout	Accept with Modification: The consistent term used is "organization" and the appropriate term remains as "assessing agency".
47	General Comment	E	The bibliography is excessively long and mostly contains citations that are not germane to Trail Searches. Provide the reader with focused reference documentation and they might read them.	Winnow the Bibliography down to canine trailing documents	Accept with Modification: The bibliography represents an overarching collection of human scent foundational references.
21	General	T	TR025 is filled with multiple terms associated with training methods and techniques yet a fraction of them are seen in this document. Terms like operant conditioning, coercion training, avoidance training, escape training, extinction training, proofing, etc. very well may be a part of initial training, maintenance training, or routine training, but this standard gives no indication. The standard is not good in giving a complete picture of all the training methods and techniques in practice.	The initial training of the canine section of the document should be updated with greater detail of the training involved. Additionally, it should be stated if the canine needs dual purpose training.	Reject: The initial training of the canine handler and canine (section 4) were written so that individual programs can develop their own training. The trainers would be responsible for designing an adequate training regimen to fit their needs.
22	Title	T	The title of the standard does not indicate that the document is a training/certification standard.	Change the title to indicate that this is a training/certification standard.	Accept with Modification: The documents in this group are not titled for certification. However, the title of this document was edited for clarification.
23	Foreword	T/E	This is a standard. The phrase "recommended guidelines" contradicts the purpose of having a standard.	Change "recommended guidelines" to requirements.	Accept
24	Foreword	E	The last sentence of the third paragraph makes no sense. Is this sentence supposed to indicate that the document was created from the stated preexisting documents?	Modify the sentence to be consistent with the sentence in standard 26. "This document is based on the Scientific Working Group..."	Accept with modification: Third paragraph was revised.
25	Foreword	T/E		Something similar to the passage below should be added to the foreword to describe the work being performed by the canine. "Prior to the start of the search, the canine is "scented" on an object (scent article) containing the target's scent. The canine works from an article to either a person or a location associated with that person. The goal is for the canine to detect and use a specific person's scent on a scent article to either search for and follow a matching scent trail to this specific person or a location associated with this person while discriminating from all nonmatching scent trails, or to correctly demonstrate the absence of a matching scent trail. Canines used in this discipline are typically deployed in search and rescue and forensic investigative functions, and typically not in immediate apprehension functions." The passage should be tailored to the specific requirements of this standard. Additionally, a sentence should be added that states "Failure to train canines to the requirements outlined in this document is expected to increase inaccuracy and inconsistency."	Reject: This level of detail is inappropriate for the foreword. ASB guidelines suggest the following "[First part of the Foreword should include the scientific and/or operational underpinnings for the requirements laid out in the standard or best practice recommendation. When writing this section, the authors should keep in mind that this need not be a full scientific treatise, but rather a general overview of the principles. The forward cannot include recommendations or requirements. Each revision of the standard shall include a summary of the substantive changes to the previous edition.]".
48	1.00	E	This document suffers from randomized use of agencies, departments, organizations, professional organizations, and individual(s) (some trainers/handlers are a one-person organization). The document should self-define agencies, department, entity, individuals as "organizations" or "entity" here in the Scope and use the same term throughout the Standard. Are these entities the providers or the assessors?	substitute "organization" or "entity" or "organization/individual"	Accept with Modification: The consistent term used is "organization" and the appropriate term remains as "assessing agency".

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26	3.00	T/E	This section of the document is way too cumbersome. There are 52 terms listed in the section are not found in the body of the document.	Remove all terms that are not found in the body of the document or provide clarity on the content found in the body of the document.	Accept with modification: Several terms were deleted and the reference to TR 025 was added. Also, the use of odor/scent was edited as appropriate throughout the document to read as "scent".
27	3.1-3.3	T/E	Neither of these terms are used in the document. The document does not indicate who or what should be accredited or a standard that should be used for accreditation purposes.	Accreditation is important, and this should be communicated somewhere within the document. If additional clarity on accreditation is not added to a section of the standard these three definitions should be removed from the document.	Accept
28	3.4	T/E	The definition given for active alert does not convey a positive response that a handler or investigator would want to see at a crime scene. The idea of disruption to the environment or evidence does not seem like a positive attribute a canine would be trained to have. This definition contradicts situations where the term is used throughout the document. Additionally, what is the canine responding to with an active alert? For example: 4.2.1.2 The canine shall be trained to perform a pre-determined specific final response (active or passive alert) upon locating the trained scent (positive alert).	The definition of active alert needs to be reconsidered since the potential for destruction, alteration, or contamination of the evidence from some of this behavior (scratch, dig, etc.), it should be considered whether these should be noted as disfavored alerts.	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon. This definition is appropriate for its use in this document.
49	3.4	E	This definition needs work. It does not define active alert other than to give "i.e. examples." The idea that a demonstrative display of an alert "may disturb the environment and/or forensic evidence" is not related to a definition and is only a consequence of the active alert. This information is a 'note.'	Write a real definition	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon. This definition is appropriate for its use in this document.
50	3.10	E		Write a real definition	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
51	3.16	E	We have yet another term for scent/odor: "treatment". Use consistent terminology throughout the document.	Substitute "scent"	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon."
74	3.17	T	species name should be italicized	<i>Canis familiaris</i>	Accept: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
52	3.25	E	Another definition that relies on a series of "i.e. examples." This is not good form.	Write a real definition	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon."
53	3.27	E	This document suffers from randomized use of agencies, departments, organizations, professional organizations, and individual(s) (some trainers/handlers are a one-person organization). The document should self-define agencies, department, entity, individuals as "organizations" or "entity" here in the Scope and use the same term throughout the Standard. Are these entities the providers or the assessors?	substitute "organization" or "entity"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon."
75	3.28	E	Not sure that "trained odor" is the correct verbiage here. Technically we don't train the odor, we train a dog to recognize a target odor.	...target odor to which the dog is trained.	Accept with modification: The word "odor" was removed because this discipline is only training on scent.
76	3.36	E	Not all contamination is "inadvertently" introduced. During training, contamination is often purposefully introduced as a distractor to proof the dog to the target odor.	When a non-target odor/stimuli is inadvertently or purposefully introduced.	Accept with modification: Recommendation was taken as suggested, except for the word "stimuli". This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
77	3.45	E	Distractibility is not always "easy". Thus the use of the qualifiers "easily distracted" or "not easily distracted".	The ease of eliciting a loss of focus/attention from the current task.	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon."
78	3.55	E	There is a tendency in this document to trade off between the use of "trained odor" and "target odor" .	I would suggest sticking with "target odor" since we don't technically train odor, we train to recognize a target odor. But either way the document should use only one descriptor "trained odor" or "target odor".	Reject: Although this definition was removed, scent is the appropriate term for this document.
54	3.57	E	The gender of the dog is unimportant.	Change <i>he/she</i> to <i>the canine</i> .	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
79	3.61	E	In other documents this is defined as a "false alert", which makes sense. Would not a "false response" be both a false negative or a false positive? Why is it defined as only a false positive?	Either omit "false response" or define as: In a controlled environment, the canine responds as if a trained substance was present when it is known that it is not; or not present when it is known that it is.	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.

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80	3.66	E	why classify this as "human" scent behavior, would this not just be "scent behavior" true of any specific scent of interest in the environment?	rename as "scent behavior" and remove "human" from the definition.	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
55	3.73	E	Poorly said	Change (<i>i.e., is interested in</i>) to <i>demonstrates interest in</i>	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
56	3.78	E	This document suffers from randomized use of agencies, departments, organizations, professional organizations, and individual(s) (some trainers/handlers are a one-person organization). The document should self-define agencies, department, entity, individuals as "organizations" or "entity" here in the Scope and use the same term throughout the Standard. Are these entities the providers or the assessors?	substitute "organization" or "entity"	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
81	3.82	E	A "negative response" does not necessarily mean an alert/indication. For example, a drug dog does not give an "alert/indication" if no drugs are present, he/she simply does not give a positive alert. The same is true of some trailing dogs, they simply do not take a trail if the target scent is not present, while others have been trained to give a specific behavior to indicate no scent is present. This definition should be inclusive of both. Or leave as is and change this to a definition of "Trained Negative Response". As is, it implies that a negative response must have an alert/indication.	Behavior exhibited by a canine showing no match to odor/scent, i.e., no matching trail, no substance present, etc. This may be a specifically trained negative response behavior or the absence of a positive behavior.	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
88	3.82 / 4.2.1.3	E	A negative response does not necessarily mean an alert/indication. For example, a drug dog does not give an "alert/indication" if no drugs are present, he/she simply does not give a positive alert. The same is true of some trailing dogs, they simply do not take a trail if the target scent is not present, while others have been trained to give a specific behavior to indicate no scent is present. This definition should be inclusive of both.	Behavior exhibited by a canine showing no match to odor/scent, i.e., no matching trail, no substance present, etc. This may be a specifically trained negative response behavior or the absence of a positive behavior.	Accept with modification: Definition was updated. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
82	3.86	E	I would disagree that "scent" is traditionally just related to "human". I would however agree that it has been traditionally related to "live" beings. But even perfume or aftershave they don't talk about the odor they talk about the scent.	Omit: "Scent" has traditionally referred to canine detection of humans.	Reject: although this definition was deleted this definition is appropriate and approved by the CB in TR 025.
57	3.96	E	Weakly said	Change to be deployed to <i>document qualification for deployment</i>	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
58	3.97	E	This definition is vague.	<i>Mission specific objectives</i> is not the same as <i>successful certified performance</i> .	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
83	3.106	E	Not sure that "sample" is the best verbiage here, perhaps "representative"	A representative target scent.....	Accept: These comments will be provided to TR 025 WG to be included when this TR is revised sometime soon.
84	3.107	E	I think that the verbiage should be the same for both 024: 3.106 and 3.107; 026: 3.88 and 3.89; 027: 3.98 and 3.99. "sample target scent" versus "sample target odor pad (scent article)".		Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
59	3.108	E	This definition is whack, starting with "Exists..." there must be a better, accepted forensic definition of probable cause.	Use a more accepted, better definition	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
60	3.112	E	Sentence #2 is a non-sentence (no verb). Also any measurement in the current known universe is not "free from random errors." Random errors always contribute to the measured value.	Add a verb, delete non-sensical concept on random errors	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
61	3.117	E	Is "scent" strictly limited to "live humans?" What if the perpetrator/runaway dies on the trail?	delete <i>live</i>	Reject: This definition is appropriate and approved by the CB in TR 025.
85	3.119	T	3.119 and 3.124 appear to be similar.	Omit 3.119	Reject: Definition #3.124 was removed and definition #3.119 is a terms used in this document.
62	3.120	T	Locating the scent is more than just "moving upwind" in some random direction.	The canine must <i>locate the target by following the scent upwind</i> .	Reject: Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon.

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87	3.133	E	A split trail does not have to be "straight line".	Refers to a training exercise in which two subjects walk together and then split into two different directions.	Accept with modification: This term was changed to "split trail". This definition's (#3.65) first sentence was updated to read "A training exercise in which two subjects walk the same pathway and then split into two different directions." This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
86	3.130	E	024: 3.130 and 3.137 should be the same. 026: 3.111 and 3.118 should be the same	The scent pathway left by an individual moving. (see scent trail)	Accept with modification: 3.43 was updated to read "Scent pathway left by an individual moving." This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
29	4.1	T	The requirements of section 4.1 don't describe bonding between the handler and the canine or how a handler would go about rewarding a canine. The section is not clear in stating which learning objectives would be done with and without the canine. Since canine is being trained by someone besides the handler, how much hands-on training must take place between the actual canine team before they would be ready for assessment.	The objectives in the section need to be clear in stating which exercises are with and without the canine. Information on the bonding and rewarding system needs to be added. An approximation of bonding time needed between the canine and the handler should be given before the team is ready for assessment.	Reject: This comment is not included in the scope of this document. The competent trainer designs the training plan specific to organization's needs.
30	4.1.2b	T	Comment: What "[c]anine handler training shall include . . . the acquisition and processing of scent by the canine" means is unclear.	Please elaborate.	Reject: The competent trainer designs the training plan specific to organization's needs.
31	4.1.2h	T	"[F]itness for canine and handler" needs more elaboration. Is this a matter of "physical fitness"? Fitness for a particular task? It should include knowledge about aging of canines, and how that affects reliability in the field.	Clarify these terms.	Reject: The competent trainer designs the training plan specific to organization's needs.
32	4.1.2i	T	Legal aspects should also include standards for admissibility and discovery rules for scientific and nonscientific expert evidence. Handlers should understand that any expert evidence is likely to be subject to, at a minimum, some reliability analysis, and knowing the relevant rules in their jurisdiction will help them train appropriately and keep appropriate records.	Include "relevant laws and rules about admissibility discovery." The bibliography should include references and caselaw relevant to the presentation of scientific/technical evidence.	Reject: Relevant case law is constantly changing and it is different for each jurisdiction. Reference added to TR 084.
63	4.1.2 f)	E	Not well said	Change aspects to <i>influence</i>	Accept with modification: "the aspects of" was removed.
64	4.1.3	E	This document suffers from randomized use of agencies, departments, organizations, professional organizations, and individual(s) (some trainers/handlers are a one-person organization). The document should self-define agencies, department, entity, individuals as "organizations" or "entity" here in the Scope and use the same term throughout the Standard. Are these entities the providers or the assessors?	substitute "organization" or "entity"	Reject: This is the first time the terms is used and defined for the remainder of this document. TR 025 definitions were used which is why they are multiple terms used for organization.
1	4.2.1.2	E	This is only for detection canines, not dogs that are trailing people. The positive indication for location checks is the dog follows the scent.	The canine shall be trained to perform a pre-determined specific final response (active or passive alert) upon locating the subject (positive alert) and must show positive trailing behavior when in scent.	Reject: Positive trailing behavior occurs prior to the final response and this statement corresponds to the final response.
2	4.2.1.3	E	Requiring a dog to sit when it does not find the scent of an individual is impractical as scent is not continuous. You can have a trail and then the scent disappears, then reacquired in 50 yards. This can happen many times in different environments, do you want a dog to stop and sit every time they encounter a scent hole? No, this is actually a behavior that the dog exhibits and the handler must recognize. It is negative behavior that is built in, not a specific negative alert behavior. The dog moves forward, stops, turns its side to the handler, moves backward, checks another direction, and shows no forward trailing behavior. Bomb dogs are not trained to give a negative indication or alert if no bombs are present. It is a readable behavior that may be different for each dog.	The handler must be able to determine negative behavior from canine when target scent is not present.	Reject with Modification: Section 4.2.1.3 was modified to address this comment. However, the proposed resolution provided by the commenter is covered in section 4.1 Handler Training.
33	5.00	T/E	Obedience training is a requirement during the initial training of the canine; however, it's not clear if that is what's meant in 5.6.1.1.7.3 where it states demonstration of the canine handler's control. Is this control verbal or on lead? In standard 27 the term control training is used but this term is not defined here or in TR025.	Be clearer on what control the handler must demonstrate whether it be verbal/on lead, or both. There should be a definition for control pertaining to the canine in section 3.	Reject: See section 4.2.1.1. Commenter's recommendation is addressed in this section.

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3	5.3	E	It looks like this wording was taken from scent detecting dogs such as HRD, narcotics or bombs. When finding positive scent of an individual there is not final response the team starts to follow the scent. There can be FTR required when the team finds the correct subject, but that is not how it is read here.	The canine handler shall articulate the canine's negative and positive scent behavior prior to the start of the assessment. The canine may not be able to make a final response due to the components and parameters of the assessment. Reasonable consideration by the assessor shall be given in these instances (e.g., the target is inaccessible for the canine to make a final response).	Reject: The term final response includes both positive and negative behavior.
65	5.3	E	Better said	articulate <i>the nature</i> of the canine's	Reject: Proposed resolution adds ambiguity to this statement.
4	5.6.1.1.7.6.2	T	. Six is an arbitrary number and too big of burden for testers. This requires at least 2 different targets, and 6 distractors not to mention, for us, 2 evaluators. This could be over 20 volunteer hours to put on one test. It also does not result in better results, 2 positive tests with and additional one being a negative is enough to demonstrate the behavior.	At least 3 location checks, with the scent of at least two different human targets, in at least three different areas, with different human distractors shall be performed in this assessment.	Reject: The six location checks is an acceptable number for this type of assessment.
66	5.6.1.1.7.6.4	T	The overused and inaccurate term "matches" causes a lot of trouble in forensic evaluations. A scented article does not have the exact odorant profile of the individual, so it does not match.	Detection of the human scent trail is <i>in agreement (or in harmony) or is associated</i> with the source of the pre-scented article – they don't match.	Accept with modification: "matches" was replaced by "associated".
5	5.6.1.1.7.6.9	E	Why is there a time limit? Do EMT have a time limit to put in an IV? Why 5-minutes? Doesn't it take some time for a canine to survey the scent in an area? If you have an intersection to check you need to allow the canine to check each direction to get a direction of travel. Large intersections could take 15 minutes to check. Why is this rushed are we trying to determine possible evidence that could be affected by environmental conditions that are not able to be controlled?	Each location check shall be completed in a reasonable amount of time depending on location of test, traffic, complexity of intersection and weather.	Reject: 5 minutes is acceptable for this type of assessment.
67	5.6.1.1.7.6.14.1	E	Don't use <i>match</i>	Here matching could be replaced with <i>target</i> .	Reject: "match" was replaced by "associated".
6	5.6.1.1.7.6.14.2	E	What does this mean? If there is not a target at end of trail then dog must do a FTR? Dogs should not be trained to do a FTR at the absence of scent it is a group of behaviors that the Handler must recognize, like giving negatives in every direction, no forward trailing behavior. Scent disappears for many reasons and we cannot have dogs sitting every time this happens.	DELETED- there should always be a subject at the end	Reject: Location is the appropriate term when the target is not assessable (e.g. person is behind a closed door, inside of a vehicle, etc.).
7	5.6.1.1.7.6.15.1	E	50-yards is an arbitrary number, wind can carry scent a long distance, say one neighborhood block over which is more than 50 yards. These distance requirements should not be required for trailing, this is not tracking and you are willing to fail a team that is 55 yards from the track but finds the subject??	The assessing agency may take into consideration environmental influences on the scent in determining whether or not a canine team is still on track/trail.	Reject: The second sentence accommodates the commenter's concern.
68	5.6.1.1.7.6.15.1	E	Insert a space between the number and the units	50 yd	Accept
8	5.6.1.1.7.6.15.3		. Why is there a time limit? Do EMT have a time limit to put in an IV? Why 5-minutes? Doesn't it take some time for a canine to survey the scent in an area? If you have an intersection to check you need to allow the canine to check each direction to get a direction of travel. Large intersections could take 15 minutes to check. Why is this rushed are we trying to determine possible evidence that could be affected by environmental conditions that are not able to be controlled?	Each location check shall be completed in a reasonable amount of time depending on location of test, traffic, complexity of intersection and weather.	Reject: 5 minutes is acceptable for this type of assessment.
9	5.6.1.1.7.6.15.6		The language used differs from section to section. Again FTR are used for the presence of an odor. Only behavior can be used for a negative indication. Throwing in a variable that a target may not be at the end of a trail is not useful, there should always be a subject at the end of a trail to test the dog. There are many legitimate reasons why a dog can lose a trail, and those moments do not necessarily mean the target got into a car and drove off.	not really sure how to get the language the same between sections	Reject: If the canine does not perform the final response, the search is not completed.

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10	5.6.2.5		This is not necessary, there is no evidence that teams certified at higher re-certification rates, like two years, are less capable. CPR is re-certified at 2-year intervals and this skill is not practiced routinely by most cardholders unless they work in a hospital or on an ambulance. Firefighters do not have to re-certify they do on-going training and assessment. Re-certifying is appropriate because if a team does not utilize the skills on an on-going basis their skills can become unreliable, but every year is a huge burden on volunteers and team without a benefit. Re-certification at two-year intervals is the industry standard.	The canine team shall be required to complete a double-blind assessment as determined by their agency 5.6.2.5 6.1 Certification for the named canine team shall be valid for two years	Reject: Please refer to section 5.1 (5.1 Assessments are part of certification, maintenance training, and proficiency testing.). A double-blind assessment may be completed by the trainer, organization and/or anyone assisting with training. The statement regarding 6.1 is addressed in comment #89.
34	6	T/E	The section doesn't give the requirements for a successful certification.	Add the requirements for a successful certification.	Reject: The assessments used for certification are described in detail in section 5. Also, 6.7 directs the reader to use these assessments described in section 5. Section 6.9 further describes for the reader.
89	6.1	E	While law enforcement usually has a industry standard of certifying on an annual basis, although that may be marked by the calendar year and not the actual test date, therefore allowing for more than 12 months. Their agency bears the burden of the workdays taken to do so, as well as the travel and testing cost associated with testing. The Civilian SAR, on the other hand, has an industry standard of every two years. Given the costs of testing and traveling for the test, days off work, room and board, etc. are the burden of the unpaid professional volunteer, as well as often the low frequency of testing available within a reasonable distance. Additionally, the evaluators putting on the tests are also unpaid professional volunteers who give of their time, vacation days and money to conduct these tests. Therefore, I think that some further consideration should be given to this as an annual requirement.	Civilian SAR have a 2 year Certification	Reject: Even though we acknowledge the fact there are other time lapses for certification. The goal for the document is to standardize the certification. Please refer to the American National Standard (ANS) "ANSI/ASB Standard 088, General Guidelines for Training, Certification, and Documentation of Canine Detection Disciplines."
11	6.2		Certification does not remove the requirement for continued training. This idea of double-blind studies comes from some need of the Scientific Working Dog Group to be scientific. Double-blind studies are not used for all scientific studies. They are not appropriate for all scientific studies. Certification is not a scientific study. If a behavioral scientist wants to study how dogs, follow scent then a double-blind study may be that is necessary but not for certification.	The canine team shall perform regular documented maintenance training, assessments, and follow other recommended local, state and/or federal guidelines.	Reject: The use of a double-blind assessment it is not intended as a scientific study. It is intended to remove the influence of anyone present in the assessment, for example, safeguard against bias and/or cueing.
35	6.3, 6.8	T/E	Day-to-day training is not defined in TR025 or this document. Clarify what is meant by the term.	If day-to-day training is the same as routine training, day-to-day should be replaced with routine. If day-to-day training is not routine training the term needs to be defined.	Accept with modification: "Day-to-day" was replaced with "(maintenance training, periodic proficiency assessments, double-blind assessment, etc.)".
12	6.7		This does not make sense, Assessments are something that are on-going they occur during training and are not completed by the organization providing certification. This statement is confusing and not practical. This document seems to confuse assessments with certifications or are you proposing that teams take 12 different test to be certified, every year?	The certification shall be comprised of a certification test, assessments are to be used to determine if team is ready for certification testing.	Reject: Certifications are composed of assessments. Assessments are discussed in section 5. Please refer to the published ASB TR 025 Section 3.23 definition for assessments and to section 3, definition #3.7 of this document "An evaluation during training and/or certification process; a tool to assess canine team ability."
13	6.90		This is arbitrary. Requiring both assessments and certifications really means all the tests are certifications. A team developing their skills will go from 0% success to maybe 90% success and the only way may be to give them Assessment tests. So when does the success rate start. A team that passes a certification test should be fielded at the discretion of the organization. If these requirements are in here a Defense Attorney will look at someone's training logs and request that the evidence the dog has found be thrown out if they show a 74% assessment rate. Evidence from SAR dogs is considered to meet the level of burden of proof as reasonable suspicion, not probable cause. They are not a machine analyzing DNA.	The canine team shall pass their certification test. Profecency testing in this setting is difficult if not impossible to quantify.	Accept with modification: Assessment section references added for clarity.
14	6.10		. These are not necessary for all failures, the test could be set poorly. A team that need a CAP should receive one, not all must.	A canine team that fails the certification process shall, if appropriate, complete a documented corrective action plan before making another attempt to certify	Reject: The canine team shall complete a remediation plan in all instances.
36	6.Ten	T/E		Specify who is responsible for writing the corrective action, the agency or the assessor.	Accept with modification: "developed by the canine team's trainer" was added for clarification.

#	Section	Type of Comment (E-)	Comments	Proposed Resolution	Final Resolution
37	6.11	T/E	It shouldn't be optional for the certifying official to identify the performance deficiency to the handler. The team fails the assessment and the handler should be informed.	This should be changed to "Certifying officials shall identify performance deficiencies to the canine handler or agency..."	Accept with modification: "Should" was replaced with "shall". The certifying official's responsibility is to share the results with the handler being evaluated.
38	6.11	T/E		The standard suggests there are many trainers involved in canine training. Which trainer is responsible for determining the remediation time, can it be the handler, or a certified trainer? This term needs specification.	Reject: The canine team's organization shall make this determination.
39	6.12	T/E	This is a standard and the phrase "recommended guidelines" should not be used in this document. Furthermore, there are only two should statements in this section which should be changed to shall statement, everything else is a requirement.	The sentence should be changed to "Organization(s) may enhance standard requirement in order to make organizational requirements more stringent."	Accept
40	7.1b	E		Weak areas are deficiencies. Delete "weak areas."	Accept
15	7.2		SAR teams are not necessarily set up with a trainer, the group trains the individual using a mentorship process. This language limits the structure of the group. Please adjust this language to expand idea of a trainer.	Routine training conducted solely by the handler to maintain the canine's proficiency is acceptable, but not a best practice, and shall be combined with supervised training on a regular basis. Supervised training by a competent trainer or mentored by a group is required in order to improve performance, identify and correct training deficiencies, and perform proficiency assessments.	Reject: Training with a competent trainer is the best practice. The competent trainer may include mentored groups, but that would be organization specific.
16	7.3		16 hours is an arbitrary number. There is no evidence that shows that a team that trains for 12 hours a month is less capable than 20 hours a month. A trained team requires less maintenance training than a team in-training. Do you want a court to throw out evidence because a team has a month of 8 hours of training? What is training? 16 hours of a dog working trails a month is what 30 miles of trails? Does obedience count as training, conditioning or how about observing other teams? Again this number is being used in court to put in question evidence, it is not a certification test it is an arbitrary number. Please add "suggest" this number because not all training is documented as you have outlined, only working scent detection here, and furthermore it should not.	A canine team shall conduct a minimum of 16 hours of training per month to maintain and improve the proficiency level of the canine team. This could include obedience, exercise, assisting other dog teams, or continued education. OTHERWISE just delted or make a suggested amont.	Reject: A minimum of sixteen hours of training per month is a standard amongst the law enforcement and professional canine communities. This does not mean that a team that requires additional proficiency training cannot exceed this threshold.
17	9.5		Standardizing training records is a dangerous thing to do in a field where the consequences could mean a guilty person gets off because a Defense Attorney argues that a training log is deficient. That is why there are no standardization for police logs, firefighter logs, medical logs etc. Please use this as a suggestion by saying "may include". Some of these requirements are arbitrary ... Target descriptors and number of targets (e.g. gender, age, ethnicity, stature, etc.)... are you willing to throw out a murder conviction because of this?	Training records may include, but are not limited to the following data.	Reject: Shall is appropriate (see updated Forward section that explains the use of "shall") and none of the mandatory information is unattainable.
18	9.6		Standardizing training records is a dangerous thing to do in a field where the consequences could mean a guilty person gets off because a Defense Attorney argues that a training log is deficient. That is why there are no standardization for police logs, firefighter logs, medical logs etc. Please use this as a suggestion by saying "may include". Some of these requirements are arbitrary ... Target descriptors and number of targets (e.g. gender, age, ethnicity, stature, etc.)... are you willing to throw out a murder conviction because of this?	Training records may include, but are not limited to the following data.	Reject: Shall is appropriate (see updated Forward section that explains the use of "shall") and none of the mandatory information is unattainable.
69	9.6 p)	E	This document suffers from randomized use of agencies, departments, organizations, professional organizations, and individual(s) (some trainers/handlers are a one-person organization). The document should self-define agencies, department, entity, individuals as "organizations" or "entity" here in the Scope and use the same term throughout the Standard. Are these entities the providers or the assessors?	substitute "organization" or "entity"	Accept with modification: "Assessing agency" is now used.

#	Section	Type of Comment (E-	Comments	Proposed Resolution	Final Resolution
19	9.7		Standardizing training records is a dangerous thing to do in a field where the consequences could mean a guilty person gets off because a Defense Attorney argues that a training log is deficient. That is why there are no standardization for police logs, firefighter logs, medical logs etc. Please use this as a suggestion by saying "may include". Some of these requirements are arbitrary ... Target descriptors and number of targets (e.g. gender, age, ethnicity, stature, etc.)... are you willing to throw out a murder conviction because of this?	Training records may include, but are not limited to the following data.	Reject: Shall is appropriate (see updated Forward section that explains the use of "shall") and none of the mandatory information is unattainable.
20	9.8		Standardizing training records is a dangerous thing to do in a field where the consequences could mean a guilty person gets off because a Defense Attorney argues that a training log is deficient. That is why there are no standardization for police logs, firefighter logs, medical logs etc. Please use this as a suggestion by saying "may include". Some of these requirements are arbitrary ... Target descriptors and number of targets (e.g. gender, age, ethnicity, stature, etc.)... are you willing to throw out a murder conviction because of this?	Training records may include, but are not limited to the following data.	Reject: Shall is appropriate (see updated Forward section that explains the use of "shall") and none of the mandatory information is unattainable.
70	9.90	T	How are operational outcomes "confirmed?" Instrumental methods, finding additional material evidence, use of a crystal ball? What?	Name confirmation approach(s)	Accept: This information (identification of a known location associated with the target person after following the trail) was added to clarify section 9.9. This information (identification of a potential location associated with the target person after following the trail) was added to clarify section 9.10.
71	9.90	T	How are operational outcomes "confirmed?" Instrumental methods, finding additional material evidence, use of a crystal ball? What?	Name confirmation approach(s)	Accept: This information (identification of a known location associated with the target person after following the trail) was added to clarify section 9.9. This information (identification of a potential location associated with the target person after following the trail) was added to clarify section 9.10.
41	9.9, 9.10	T/E	It is not appropriate to use confirmed operational outcomes as proof of a team's reliability or capability. Ground truth is not, and cannot, be known in operational settings; confessions, pleas, verdicts, and other evidence may all be wrong. Only training records, assessments, and certification can demonstrate capacity. It is particularly inappropriate when read in light of the following standard which states that non-confirmed shall <i>not</i> be used for canine proficiency. This could give a grossly misleading picture of a dog's reliability, as a dog might have one "confirmed" outcome and dozens of wrong unconfirmed outcomes. That unconfirmed outcomes might not be incorrect is true, and that is why field records are not appropriate proof of proficiency or reliability.	The standard should state that operational outcomes are not proof of a team's proficiency, because true outcomes (whether correct or incorrect) cannot be known.	Reject: Confirmed operational outcomes are just one factor to determine proficiency. The totality of training, certification and assessments determines the canine's true proficiency.
43	Annex	E		Burne, L. "No your Friend Cannot Do Magic: Unites States v. Sandra Marie Anderson and Cadaver Dogs on Trial" appears to be an unpublished class assignment that has not received peer review. It also isn't easily accessed. It should be removed as a reference.	Reject: Annex C has been removed. Relevant case law is constantly changing and it is different for each jurisdiction.
72	Annex A last paragraph	E	This document suffers from randomized use of agencies, departments, organizations, professional organizations, and individual(s) (some trainers/handlers are a one-person organization). The document should self-define agencies, department, entity, individuals as "organizations" or "entity" here in the Scope and use the same term throughout the Standard. Are these entities the providers or the assessors?	substitute "organization" or "entity"	Accept with modification: "organization" is now used.
73	Annex B	E	The value of extensive Bibliographies in a consensus standard is a matter of debate.	Brevity is the soul of whit.	Accept with Modification: The bibliography represents an overarching collection of human scent foundational references.
42	Bibliography	E	Additional case law needs to be added to give a full understanding of the rulings on the use of canines.	Consider adding United States v. Burgos-Montes, The People of the State of Illinois v. Rolando Cruz, Brafford v. State, State v. Storm, Brott v. State. We are willing to provide you with other cases.	Reject: Annex C has been removed. Relevant case law is constantly changing and it is different for each jurisdiction.