

Deadline of Submission of Comments: 16-Mar-20

Document Number: ANSI/ASB Std 026

Document Title: Crime Scene/Death Investigation - Dogs and Sensors Pre-Scented Canines - Aged Trail Search

#	Section	Type of Com	Comments	Proposed Resolution	Final Resolution
23	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.
51	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.	Include only terms unique to tracking/trailing	Accept with modification: Several terms were deleted and the reference to TR 025 was added.
52	General Comment	T	The term 'match' is a 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 of the article and target person can be <i>associated</i> by the dog.	Accept: Two terms were edited to replace match with associate and also the term match was updated throughout the document to read associate.
53	General Comment	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Paranetically define agency, entity, department, 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".
54	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.
24	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.
55	Foreword	E	Misuse of term matching	Replace matching with <i>the target</i> (two times)	Accept with Modification: The term "match" was replaced with "associated".
25	Foreword	T/E	This is a standard. The phrase "recommended guidelines" contradicts the purpose of having a standard.	Change "recommended guidelines" to requirements.	Accept
26	Foreword	E	In addition, this sentence "Canines not trained to the requirements outlined in this document may result in inaccurate and inconsistent results" is misleading even if true. No canine is 100% accurate, so even canines trained to this standard may make mistakes.	It might say something like "Failure to train canines to the requirements outlined in this document is expected to increase inaccuracy and inconsistency."	Accept with Modification: The first sentence was edited.
27	3	T/E	This section of the document is way too cumbersome. There are a considerable number of 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
68	3.100	T	Technically the plume is expanding in height and width	repalce becoming wider with <i>expanding</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."
28	3.1-3.3	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: These terms were removed.
29	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.

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56	3.4	E	This definition needs work. 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.
30	3.4	E		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.
91	3.15	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."
57	3.16	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Paranetically define agency, entity, department, organization, individual as 'organization' or 'organization/individual' and consistently use that term throughout	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon."
58	3.24	E	The Standard is about tracking/trailing humans, so scent is the correct term.	replace odor/scent with <i>scent</i>	Accept
92	3.24	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.
93		E	Not all contamination is "inadvertently" introduced. During training, contamination is often purposefully introduced as a distractor to prove the dog to the target odor.	When a non-target odor/stimuli is inadvertently or purposefully introduced.	Commenter retracted this comment.
95	3.27	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: This definition was deleted as it is not used in this document.
96		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.	Commenter retracted this comment.
59	3.29	E	This "definition" is a description of consistent measures not consistency	This definition needs work. Define Consistent Measures as: Repeated measurements of the same thing that produce the same results	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	3.32	E	remote trainer is colloquial	add remote trainer <i>collar</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."
94	3.39	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."
61	3.45	E	Better said	...which <i>otherwise</i> may...	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."
62	3.45	E	extreme' is an adjective that is not modifying a noun	...which may <i>present</i> extreme hazards.	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."
97	3.52	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."
63	3.62	T	The term 'match' is a 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.	replace matching to sample with <i>associating samples</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."
64	3.64	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	replace department or agency with <i>organization</i>	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.

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65	3.65	E	(managed by NIST) This may not be true in the future.	The plan for OSAC 3.0 is NOT to have NIST manage this program.	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."
98	3.67	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.
105	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.	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.
100	3.88	E	Not sure that "sample" is the best verbage here, perhaps "representative"	A representative target scent.....	Accept with Modification: The word "scent article" is now used to replace the word "sample".
66	3.88	E	The term 'match' is a 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.	replace match with <i>associate</i>	Accept
101	3.89	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)".		Accept with modification: The term "odor" was removed throughout the document where appropriate for consistency in this discipline. Although this definition was removed, these comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon."
67	3.92	E	Sentence 2 is a non-sentence lacking a verb	Add a verb	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."
99	3.97	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: This definition is appropriate and approved by the CB in TR 025.
69	3.104	T	The term 'match' is a 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.	replace match with <i>association</i>	Reject: Although this definition was removed, the term "match" was replaced with "associated".
103	3.111	E	024: 3.130 and 3.137 should be the same. 3.111 and 3.118 should be the same	026: 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.
70	3.113	T	This definition should refer to the team	add ...and the <i>canine and</i> handler does not.	Accept with modification: 3.44 was updated to read "An evaluation of the canine team's ability to complete an exercise where the evaluator knows the outcome and the canine team does not." This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
104	3.114	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 (3.45) first sentence was updated to read "Refers to 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.

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71	3.115	E	Where in the world did this definition come from? What are 'other things?' It is obtuse and confusing.	Find a widely accepted definition of Standard	Reject: This definition was removed.
102	3.119	T	3.119 and 3.124 appear to be similar.	Omit 3.119	Commenter retracted this comment.
31	4.1	T	The section does not indicate how competency is established for the handler. Does this individual need to complete written and/or oral exams on the topics covered in 4.1.2? Does this individual need to perform a moot court? How does a handler demonstrate proficiency in these areas? Is competency related to dog handling in general, or to this particular task?	Another statement needs to be added to the section detailing how competency is established for the handler, if it's the parent organization or outside organization that determines competency, and how the handler demonstrates proficiency in any of the areas specified in the section.	Partial Accept: This comment will be addressed by another group that will eventually develop this document. (Note for CB locate the SWIG Dog document at OSAC). Please note these issues were identified in SWGDOG documents now being revised by OSAC and will be submitted to ASB. Handler training and progression is a document in development at OSAC.
32	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.
33	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.
34	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.
35	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.
73	4.1.2 j)	E	Better said	change to ... legal documentation to <i>documentation for legal proceedings</i> ..	Reject: "Legal documentation" is appropriate for this section. Reference added to TR 084
72	4.1.2 f)	E	The phrase 'the aspects of' adds nothing.	change to ..on the aspects of cognitive...	Accept
74	4.1.3	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Choose a term	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.
75	4.2.1	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Choose a term	Accept: Only one term "organization" was chosen.
36	4.2.1.2	T		Based on the definition of target, 4.2.1.2 and 4.2.1.3 say the same thing. One of the two statements can be deleted.	Accept: Duplicative section 4.2.1.2 was deleted.
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 posstiive 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.
76	4.2.1.6	E	Better said	...scent, <i>increasing</i> trail distances...	Accept

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37	5	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.
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.
77	5.5	T	The term 'match' is a 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.	replace non-matching with <i>non-target</i>	Accept with modification: "non-match" was replaced by "non-associated".
78	5.6.1.1.1	T	The term 'match' is a 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.	replace matching with <i>associated</i>	Accept
79	5.6.1.1.1	T	The term 'match' is a 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.	replace non-matching with <i>non-target</i>	Accept with modification: "non-match" was replaced by "non-associated".
80	5.6.1.1.2	T	The term 'match' is a 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.	replace matching with <i>target</i>	Accept with modification: "match" was replaced by "associated".
38	5.6.1.1.6.4	T	This directs that the "[t]he target trail and one human distractor trail shall be aged a minimum of 30 minutes, and one distractor trail shall be aged a maximum of 15 minutes," but this "this document is specifically dedicated to specialized protocols for trailing canines, to be used when trails are 24 hours or older." A trail aged 31 minutes, which this standard permits, cannot demonstrate a canine can follow a trail over 24 hours old.	The standard should direct the target trail should be aged a minimum of 24 hours. Or an explanation differentiating this standard from "operational assessment" should be inserted.	Reject: Scent recognition assessments are used to demonstrate the canine's ability to scent discriminate. The age of the trail does not impact scent discrimination capability and it is further tested in the operational assessment(s).
81	5.6.1.1.6.5	T	The term 'match' is a 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.	replace non-matching with non-target replace matching with target	Accept matching modification: "non-match" was replaced by "non-associated".
82	5.6.1.1.6.10	T	The term 'match' is a 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.	replace non-matching with <i>non-target</i>	Accept with modification: "non-match" was replaced by "non-associated".
83	Figure 2	T	The term 'match' is a 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.	replace non-matching with <i>non-target</i>	Accept with modification: "non-match" was replaced by "non-associated".

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39	5.6.1.1.6.12	T	How the assessing agency make take into consideration "environmental influences" on success needs to be explained, as does their basis. Also, if the assessment reflects "typical mission requirements of the canine team's department, agency or organization," then a canine's failure to find the trail in training due to environmental influences may reflect on his reliability in the field.	Please explain what environmental influences are to be considered and how this might affect field reliability.	Accept: An example was added to this section.
84	5.6.1.1.6.13	T	The term 'match' is a 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.	replace matching with <i>target</i>	Accept with modification: "match" was replaced by "associated".
4	5.6.1.1.7.6.4		That is a turn every 500 feet, little excessive and may not meet all training areas. How about 4 turns?	Each target trail shall contain a minimum off four turns.	Reject: The turns can be any distance apart from each other.
5	5.6.1.1.7.6.10		Not enough time, there are some parts of country that are dry and take more time, some areas more complex scent. Two- hours should be enough.	The assessment should be completed in less than 2-hours.	Reject: The allotted 60 minutes is an acceptable time for this type of assessment.
6	5.6.1.1.7.6.13		. Do you mean at the end of the trail when they find something, there cannot be a final response in the middle of a trail.		Reject: The statement corresponds to canine handler's interpretation of the final response. Where the canine makes the final response is specific to the canine and may be at any point in the trail.
85	5.6.1.1.7.6.14	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Choose a term	Reject: The "assessing agency" is the correct term used for the organization conducting the assessment and is used consistently in this document.
86	5.6.1.1.7.6.15	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Choose a term	Reject: The "assessing agency" is the correct term used for the organization conducting the assessment and is used consistently in this document.
7	5.6.1.1.7.6.15		Two-hours not one.	Any canine team that is determined by the assessing agency to correctly follow the target trail and correctly come to a final response at the correct target, within 2-hours has passed the assessment.	Reject: The allotted 60 minutes is an acceptable time for this type of assessment.
87	5.6.1.1.7.6.16.1	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Choose a term	Reject: The "assessing agency" is the correct term used for the organization conducting the assessment and is used consistently in this document.
8	5.6.1.1.7.6.16.1	E	50-yards is an arbitrary number, wind can carry scent a long distance, say one neighborhood block over which is more that 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.
9	5.6.1.1.7.6.16.3		Not enough time, there are some parts of country that are dry and take more time, some areas more complex scent. Two- hours should be enough.	A canine team taking longer than 2-hours to complete the assessment shall be considered a failure.	Reject: The allotted 60 minutes is an acceptable time for this type of assessment.
10	5.6.1.1.7.6.16.6		Please clarify is this FTR at the subject at end of trail?		Reject: If the canine does not perform the final response, the search is not completed.
88	5.6.2.3	T	The term 'match' is a 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.	replace a match with <i>an association</i>	Accept with modification: "match" was replaced by "associated".
11	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 #106.
40	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, they must pass at least 75%.

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106	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."
12	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.
41	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.)".
13	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 cerfication test, assessments are to be used to determine if team is ready for certificaion 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. "An evaluation during training and/or certification process; a tool to assess canine team ability."
14	6.9		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.
42	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.
15	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.
43	6.11	T	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.
44	6.11	T		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.
45	6.11.1	T		It shouldn't be optional for the of the handler/trainer to receive documentation showing that remediation has taken place. The sentence needs to be changed from a should to a shall.	Reject: Not all certifying agencies require training records. However, the records shall be maintained by the canine handler.
46	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
47	7.1b	E		Weak areas are deficiencies. Delete "weak areas."	Accept

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16	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.
17	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.
18	Scent Article Material Storage and Handling		This whole section seems to be copied from another type canine discipline. SAR dog handlers do not check-out articles, they do not need to be replenished, inventoried ect-	many not applicable	Reject: This document pertains to pre-scented canines. Scent articles may be aged and maintained for months and should be inventoried.
19	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.
20	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.
89	9.6 P)	E	Once again, organization, agency, program, entity, individual, individual(s) are used randomly throughout the document.	Choose a term	Accept: "Assesing agency" is now used.
21	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.
22	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.

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48	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.
90	Annex A	T	The term 'match' is a 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.	replace non-matching with non-target replace matching with target	Accept matching modification: "non-match" was replaced by "non-associated".
49	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.
50	Bibliography	E		Reference 8, 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 eassily accessed. It should be removed as a reference.	Accept: Annex C has been removed. Relevant case law is constantly changing and it is different for each jurisdiction.