

Deadline of Submission of Comments: 23-May-25

Document Number: ANSI/ASB Std 030 e2

Document Title: Standard for a Quality Assurance Program in Bloodstain Pattern Analysis

Comment #	Text Line # (s)	Document Section	Type of Comment	Current Document Wording	Proposed Revision	Revision Justification	<i>For Working Group use only, not to be completed by commenter.</i>
			E-Editorial T-Technical				Final Resolution
14		Forward, Scope, 3.2	E		FORWARD (following is just an idea): It is acknowledged that Bloodstain Pattern Analysis (BPA) is conducted by individuals affiliated with a range of entities, including public agencies providing forensic science services, private forensic science service providers, and independent practitioners. For those operating under an established quality assurance program, this document is not intended to replace existing accreditation standards, but may support the refinement of BPA-specific elements within those programs. Additionally, this document is intended to serve as a foundational resource for agencies and individuals seeking to develop a BPA quality assurance program.	The Scope, forward, and 3.2 are not in step with another. Your definition of a FSSP is a person or agency who provides forensic services. Though many analysts are private (i.e., not working for an agency), the Forward only acknowledges individuals employed by an agency. If you didn't want to include those private persons from having to follow this standard, I don't have a big issue with it, however I think you should work on the Scope and Forward so your intent is more clear. The Scope says this standard applies to "any" FSSP, which would be an agency or a private person, therefore I think if any edits are going to occur, it would likely be most appropriate in the Forward.	Accept. change agency/agencies to FSSPs
1		3.1	E	Assessment - a method used to evaluate an individual's knowledge, skills, and abilities in BPA	Change "assessment" to "performance monitoring"	"Monitoring" is the term used in ISO 17025 for this process. This revision brings the document in line with the terms used in other relevant ISO standards.	Accept. Performance monitoring added to definitions. Assessment removed.
2		4.4 (heading)	E	Assessments	Performance monitoring	see above	Accept.
3		4.4	E	"ongoing skill assessment"	"ongoing performance monitoring"	see above	Accept.
12		4.4	E		We appreciate that there is an effort to evaluate courtroom testimony from blood spatter analysts; however, this is an area which does not have any standards linked or referred to in the accompanying document.	We ask that a standardized method of evaluation is proposed in this document.	Reject. We reference testimony in ASB Std 032 but we should not be creating a discipline-specific standard
13		4.5	E	Section 4.5 states, "The agency should establish written procedures for the identification of deficiencies and the implementation of corrective actions to address such issues as administrative, analytical, interpretive or skill-assessment errors."	I believe this process was delineated in ASB Standard 198, "Standards for the Technical Review of Bloodstain Pattern Analysis Report" located here: https://www.aafs.org/sites/default/files/media/documents/198_Std_Ballot02.pdf	If this is correct, please link to these standards.	Reject. Standard 198 does not directly apply
4		4.7	E	"risk of contamination of evidence"	"risk of contamination, loss, or degradation of evidence"	There's more to preserving evidence than just protecting it from contamination. FSSB need to make sure the evidence is not lost or degrades while in its custody. This is critical for BPA since we deal with biological evidence.	Accept.
5		4.8	E	"ensure the integrity of physical evidence"	"ensure the integrity of physical or digital evidence"	Many agencies consider digital media as evidence and treat it as such. This change acknowledges that some evidence is digital and not just physical.	Accept with modification. Sentence modified to read: "ensure the integrity of evidence in its possession"

6		4.9 (heading)	E	Equipment and Reagents	Equipment	The definition of ISO 17025 has been significantly expanded and now includes everything which had been previously called equipment, instrumentation, reagents, chemicals, and software. This revision brings the document in line with the terms used in other relevant ISO standards. It may be necessary to include the ISO definition of equipment in section 6.4.1 in ISO 17025.	Accept.
7		4.9.1	E	"calibration of equipment or instrumentation that affect"	"calibration of equipment that affects"	see above	Accept.
8		4.9.2	E		delete entire section	See above. If the decision is made to use the ISO 17025 definition of equipment, then this section can likely be deleted since it would be covered in 4.9.1.	Accept.
9		4.11	E	References The FSSP should cite and maintain all reference material used to create the Quality Assurance Program	"The FSSP may cite" or "The FSSP can cite"	Make this a "should" implies an expectation that this be done unless there is a specific reason why it is not. As worded ("all reference material"), this is a <i>massive</i> requirement. Because the current standard takes a very broad approach to essentially every point (e.g, "should have written records" etc) this casts an extremely wide net on all of the materials which could be used to develop a QA program.	Reject. "Should" means that this is a recommendation, not a requirement with the CB feels is appropriate. Commenter is misunderstanding that "should" is not a requirement.
10		5 (heading)	E	Conformance	Audits	"Audit" is the term used in ISO 17025 for this process. This revision brings the document in line with the terms used in other relevant ISO standards.	Accept.
11		5	E	"the periodic conformity assessment of BPA case files"	"the periodic audit of BPA case files"	See above	Accept.