

Public Comment Deadline: March 28, 2022

ASB Standard 079, Standard for Training in the use of Combined DNA Index System (CODIS)

#	Section		Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
78	General		E	knowledge-based or knowledge based; used inconsistently	use hyphen or no hyphen consistently throughout	Accept Added hyphen in 4.4.1
17	1		Substantive	Statement needs expansion. Also, is the intent for only forensic casework analysts? There seems to be limited information from a database analyst perspective.	May consider rewording as follows - This standard defines the minimum requirements for training a forensic and/or DNA database analyst in the understanding of legislative and laboratory policies and procedures for the development of profiles for entry into the COmbined DNA Index System (CODIS). This document excludes software training for CODIS users and required training for CODIS administrators.	Accept with modifications. Added (casework and database) and changed 2nd sentence. Note: changed defines to outlines to match STD 78.
18	3		Substantive	Many of the terms are a little off or incomplete, and the list is incomplete (e.g. CODIS, CODIS administrator, CODIS core loci, etc.). Terms are used in the document but are not defined (e.g., indices).	Consult NDIS Procedures for correct and complete definitions	Accept with modification. Changed definition to match NDIS procedures for "candidate match". Changed "hit" to match OSAC Lexicon
2	3.1		E	"association is identified" Awkward	Either change to "that is" or simply removed "is"	Accept with modification. Changed definition to match NDIS procedures for "candidate match".
3	3.2		E	"CODIS is an acronym..." The term being defined is not usually repeated at the beginning of the definition	Remove "CODIS is"; start with "An acronym..."	Accept
57	3.2		E	does FBI need to be spelled out?	if so, spell out	Reject, widely understood
19	3.3		Substantive	Definition of CODIS administrator, as currently drafted would be applicable to casework laboratories only and does not appear to be applicable to database laboratories	May consider rewording as follows - An employee of a participating federal, state or local criminal justice agency responsible for administration and security of the laboratory's COIDS at a laboratory performing DNA on database , forensic and casework reference samples.	Accept
58	3.3		E	the definition is a little awkward	Suggest rearranging the definition: An employee of a participating federal, state or local criminal justice agency with a laboratory performing DNA analysis on forensic and casework reference samples who is responsible for the administration and security of the laboratory's CODIS; or An employee who is responsible for the administration and security of CODIS in a participating federal, state or local criminal justice agency with a laboratory performing DNA analysis on forensic and casework reference samples.	Accept with modification, see Comment #19
13	3.5		T	Familial searching is a strategy that extends a DNA index beyond the profiles in the database. The definition should make that fundamental aspect of this method clear.	Edit this clause to state the following: 3.5 familial searching An additional search of a DNA database conducted for the intended purpose of [using the profile of an individual in the database to] potentially identifying [the profile of] close biological relatives[, whose profiles are not present in the DNA database,] to the unknown forensic profile obtained from crime scene evidence.	Accept with modification. Definition revised for clarification.
59	3.5		E	one can't be a relative to a DNA profile	perhaps rephrase by inserting "source" to say: "...relatives of the source of the unknown..."	Accept with modification. Definition revised for clarification.
60	3.8		E	if may be helpful to include some examples	perhaps add "(e.g.,...)" with some examples to assist individuals unfamiliar with CODIS lingo	Accept
14	4.1		T	The statement, "Based upon the laboratory procedures, some of the requirements in this section may be omitted from the training program" is vaguely worded.	Either delete (is there anything here any lab using CODIS would not need to know? Do some labs only do offender samples and not casework?) or reword to be clearer, i.e. " The laboratory's training program for the use of CODIS shall include all requirements applicable to the work conducted by the laboratory and by the individual in training." (I borrowed and modified that language from Standard 022 4.2.2.)	Accept

41	4.1		E	Section 4.1 is different than in previously ASB published training standards.	Make this section as consistent as possible with other training standards.	Accept, added wording similar to standard 023
49	4.1		E	This section does not match 4.1 in previously published training standards.	Make all sections consistent throughout all training standards.	Accept
61	4.1		E	This statement only covers aspects of CODIS that are not relevant to the laboratory but should also include portions that the analyst is not being trained in. More inclusive language is suggested.	suggest replacing with "Some of the requirements in this standard may not apply depending on the specific applications of CODIS in the DNA testing laboratory and/or the use of CODIS by the analyst being trained. "	Accept with modification " The laboratory's training program shall include all requirements applicable to the work conducted by the laboratory and by the individual in training."
42	4.2.1		E	This section is missing a paragraph that was in previously ASB published training standards.	Make this section as consistent as possible with other training standards.	Accept with modification, the standard was made consistent with published standards to the extent possible
50	4.2.1		E	There should be a colon after 'following' instead of a period.	Replace period with a colon.	Accept
62	4.2.1 c)		E	This probably needs more clarity for the laboratory and any auditor such that the laboratory must define the "relevant" validation studies.	suggest changing to something like "all of the validation studies relied upon by the laboratory to support the development of the interpretation protocol and methods used to determine the profile to be entered into CODIS"	Reject, the working group feel that c. plus d. covers the same requirements succinctly
4	4.2.2		E	"ERROR...." (twice)	Fix errors	Accept with modification, do not understand the comment. Possibly links in document that did not work? Identified and changed to: "4.2.2.1 though 4.2.2.9" in 4.2.2
15	4.2.2		T	Genetic privacy, software security, and confidentiality are important factors in understanding how CODIS works. Presumably much of this would be discussed under knowledge based training of fed/state enabling statutes but perhaps should be highlighted?	Add requirements under knowledge based training to include (or emphasize) genetic privacy, confidentiality, and software security.	Accept with modification to 4.2.2.1
23	4.2.2		E	What information is covered in the errors mentioned - "Error! Reference source not found."	Review and insert missing text.	Accept with modification, do not understand the comment. Possibly links in document that did not work? Identified and changed to: "4.2.2.1 though 4.2.2.9" in 4.2.2
43	4.2.2		E	Remove Errors and replace with numbers	Replace Errors with 4.2.2.1 through 4.2.2.10	Accept with modification, do not understand the comment. Possibly links in document that did not work? Identified and changed to: "4.2.2.1 though 4.2.2.9" in 4.2.2
48	4.2.2		E	Replace "Error! Reference source not found."	4.2.2 The knowledge-based training component of the laboratory's training program shall provide the trainee with a basic understanding of CODIS to include, at minimum, the following topics in 4.2.2.1 through 4.2.2.10	Accept with modification, do not understand the comment. Possibly links in document that did not work? Identified and changed to: "4.2.2.1 though 4.2.2.9" in 4.2.2
51	4.2.2		E	missing numbers	Replace "error! Reference source not found" with 4.2.2.1 through 4.2.2.10	Accept with modification, do not understand the comment. Possibly links in document that did not work? Identified and changed to: "4.2.2.1 though 4.2.2.9" in 4.2.2
5	4.2.2 throughout		E	4.2.2 clearly states that the sections below (4.2.2.1, etc.) shall be included at a minimum. So it doesn't seem necessary to start each (4.2.2.2, 4.2.2.3....) with "The training program shall include"	Remove "The training program shall include" from these sections	Accept with modifications, the "shall" in 4.2.2 applies to the full section, so the introductory statement was removed where appropriate.
52	4.2.2.1		E	Redundant - covered in 4.2.2.2	Remove 4.2.2.1	Accept
63	4.2.2, 4.2.2.2	Now 4.2.2.1	E	could delete unnecessary language in 4.2.2.2 already covered in 4.2.2	a) could modify 4.2.2 to say "instruction and basic understanding..."; b) delete from 4.2.2.2 the first part of the statement and start with "CODIS structure..."; c) put comma after ownership	Accept with modifications
6	4.2.2.2	Now 4.2.2.1	E	Use of "and" Awkward	change to "responsibilities, ownership, and relevant laws and guidelines"	Accept

27	4.2.2.2(a)(2)	Now 4.2.2.1	E	Incorrect reference	Memorandum of Understanding for Participation in the National DNA Index System	Accept
65	4.2.2.2 a 3) & 4)	Now 4.2.2.1	E	perhaps insert "current" to ensure instruction in the correct version rather than historical versions	suggest inserting "current"	Reject, "current" is implied
28	4.2.2.2(c)	Now 4.2.2.1	E	Incorrect reference	local legislation is not recognized for the collection or databasing of DNA samples, please see definition of applicable legal authorities in the NDIS Operational Procedures Manual	Reject, "if applicable" included to cover local situations
20	4.2.2.3	Now 4.2.2.2	E	MRE is Match Rarity Estimate, not Estimator; same for MME	Edit to correct term	Accept
70	4.2.2.3 & 4.2.2.5	Now 4.2.2.2	E	it is unclear why these are separated as they seem mostly duplicative - can they be combined into one requirement?	combine if possible for clarity	Accept with modification, deleted 4.2.2.5, modified 4.2.2.3
24	4.2.2.3 a)	Now 4.2.2.2	E	There may be different requirements for the number of CODIS core loci at SDIS/LDIS	May consider rewording as follows: the required number of CODIS core loci per LDIS, SDIS and/or NDIS policies and procedures	Accept with modification to 4.2.2.3
66	4.2.2.3 a)	Now 4.2.2.2	E	unclear if this is referring to the core loci or requirements for uploading a profile	add "for entering a profile into the various levels of CODIS" or other appropriate clarifying language	Accept with modification to 4.2.2.3
25	4.2.2.3 b)	Now 4.2.2.2	substantive	Requires more that just sample origin - eligibility is dependent on the crime, the crime scene sample and it's link to the putative perpetrator.	Refer to NDIS Procedures for eligibility or consider rewording as follows - sample origin (e.g., case scenario, specimen category, link to putative perpetrator, request/testing of elimination samples, as appropriate for forensic crime scene samples and specimen category for database samples)	Accept
29	4.2.2.3(b)	Now 4.2.2.2	E	Incorrect reference	sample type should be replaced with specimen category, which is defined in Section 3	Accept
67	4.2.2.3 c)	Now 4.2.2.2	E	add descriptive word for clarity	perhaps add "use of the" at the beginning	Accept with modification
7	4.2.2.3c	Now 4.2.2.2	E	MRE/MME	Define these in section 3?	Accept with modification. No existing definition available. "which are formula used to estimate the number of matches expected to be returned from a search of CODIS;" added to the section for clarification.
68	4.2.2.3 e)	Now 4.2.2.2	E	could add "as applicable" for clarity	could add "as applicable" for clarity	Accept
64	4.2.2.3-4.2.2.10	Now 4.2.2.2 and 4.2.2.X	E	the introduction at 4.2.2 states the training program shall provide training on the following topics. Not necessary to repeat for each subnumber	Delete "the training program shall include instruction on" from each statement	Accept
8	4.2.2.4	Now 4.2.2.3	E	"DNA Records" (CAPS)	change to "DNA records"	Accept
30	4.2.2.4	Now 4.2.2.3	E	DNA Records should be "DNA records"	It may be helpful to include a definition of DNA record in Section 3	Accept
31	4.2.2.4	Now 4.2.2.3	E	Include instruction on minimum data requirements for entry and upload of DNA records in CODIS and NDIS - it's not clear if the reference to "specific parameters" in Section 4.2.2.5 is intended to capture this.	Should include the minimum requirements for DNA record entry and upload if not covered by the "specific parameter" reference.	Reject, covered under 4.2.2.3 4.2.2.5 was removed as being duplicate based on another comment (Comment 37)
26	4.2.2.4 c)	Now 4.2.2.3	E	Add reference to obligate alleles	May consider rewording as follows - partial locus/profile versus complete locus/profile and use of obligate allele designations	Accept
69	4.2.2.4 c)	Now 4.2.2.3	E	locus and profile are two different things- use of slash is probably not appropriate; also needs a descriptor	suggestion: Presence of partial profile due to possible allele drop out and/or locus drop out	Accept
32	4.2.2.5		E	Replace 'sample type' which is not defined with "specimen category" which is defined in Section 3.	Replace 'sample type' which is not defined with "specimen category" which is defined in Section 3.	4.2.2.5 was removed as being duplicate based on another comment (Comment 37)
33	4.2.2.6	Now 4.2.2.4	E	The references to "the different searches, the indexes that search each other" may need additional clarification.	May wish to consider rewording as "the various searches for forensic and missing person databases, authorized searches..."	Accept
9	4.2.2.8	Now 4.2.2.6	E	comma after "legislation"	add comma ("...legislation, and instruction...")	Accept
34	4.2.2.8	Now 4.2.2.6	E	It may be more appropriate to include the "if applicable" at the beginning of the sentence. Additionally, the majority of states performing familial searching do not have state legislation on the subject.	May wish to consider rewording as follows: "If applicable, the training program shall include an understanding of familial searching in accordance with relevant law and specific laboratory protocols."	Accept with modification, rewrote sentence for clarity
71	4.2.2.8, 4.2.2.9	Now 4.2.2.6 and 4.2.2.7	E	it is unclear why the word "understanding" is used here since a program cannot include an understanding; also unclear how one would audit "for understanding"	use language consistent with the other requirements (e.g., provide training and instruction in)	Accept, replaced "understanding" with "use of" in 4.2.2.8. Removed "understanding" in 4.2.2.9.
10	4.2.2.9	Now 4.2.2.7	E	comma after "robust search,"	change comma to semi-colon, to be consistent	Accept

21	4.2.2.9	Now 4.2.2.7	E	Add kinship for missing person cases	May consider rewording as follows - The training program shall include an understanding of the types of samples and references that should be obtained in missing persons cases; the number of loci and quality of data to be used in missing persons cases; the inclusion of second technology requirements to provide the most robust search, what indices are searched in missing persons cases; what a pedigree tree is and the samples that are required to generate a pedigree tree; the differences between matches and associations in missing persons cases; and the application of kinship analysis.	Accept with modification. "the application of kinship analysis" added as item g)
35	4.2.2.9	Now 4.2.2.7	E	Reword for clarity	May wish to consider rewording as follows: The training program shall include an understanding of the number of reference samples that should be obtained in missing persons cases; the number of loci and quality of data to be used in missing persons cases; the necessity for additional technologies; what indices may be searched; the use of a pedigree tree and the samples required; and the differences in terminology used in missing person cases.	Accept with modification. 4.2.2.4, 4.2.2.5 and 4.2.2.6 (revised section numbers) also modified for clarity and consistency
22	4.2.2.10		E	Add kinship for missing person cases	May consider rewording as follows - The training program shall include instruction on the functionality of POPSTATS and the manner in which the laboratory uses it to generate match statistics (or other statistical estimates such as kinship analysis for missing persons), including the allele frequencies and statistical formulae applied.	Accept with modification, section deleted, but kinship analysis added to new section 4.2.2.4 a) and 4.2.2.7 g).
72	4.2.2.10		E	POPSTATS is not in caps in the definition but is in this requirement	use caps in both places for consistency	Accept with modification. Section Deleted. Popstats fixed in other locations
73	4.2.2.10		T	This requirement is for generating statistical values using POPSTATS; seems this requirement is misplaced and should be in the training standard for statistical calculations	remove this requirement to Standard 081 (could add to Scope or Foreword that this document does not cover use of POPSTATS in CODIS)	Accept with modification. Section Deleted. Popstats fixed in other locations
1	4.3, 4.3.1, 4.3.3		Clarification	Looking for clarification regarding applying this standard and creating training in labs who have specific staff as CODIS administrators, rather than staff who carry dual responsibility of CODIS/DNA analyst.	Should there be a clear difference in training requirements for staff who routinely submit samples to CODIS rather than doing searching, uploads etc?	Reject, scope was edited to clarify this document is for CODIS users, not Administrators
11	4.3.1		E	comma after "at minimum"	change to ...at minimum, the....	Accept
12	4.3.1		E	"through 4.2.3"	Fix: there is no 4.2.3	Accept
36	4.3.1		E	Reword for clarity	May wish to consider rewording as follows: "The practical component of the laboratory's training program shall provide the trainee with sufficient practical instruction for the trainee to obtain the skills for the use of CODIS by the laboratory to include, at a minimum, the components in Section 4.2.2. and its subsections."	Accept with modification, references removed
44	4.3.1		E	Numbers not correct for 4.2.2 and 4.2.3	Replace with 4.3.2 through 4.3.3	Accept with modification, references removed
53	4.3.1		E	Typos "4.2.2 through 4.2.3"	Change to "4.3.2 through 4.3.3"	Accept with modification, references removed
74	4.3.1		E	"by the laboratory" is unnecessary in this statement (and confusing in context)	delete "by the laboratory"	Accept
75	4.3.1		E	incorrect subnumbers included	correct subnumbers (4.3.2, 4.3.3)	Accept with modification, references removed
45	4.3.2		E	The Note is not used in previously published ASB training standards.	Make this section as consistent as possible with other training standards.	Accept
54	4.3.2		E	This note is not listed as a note in other published training standards.	Make consistent throughout all training standards.	Accept
76	4.3.2		E	It's unclear how a protocol can be observed and this requirement monitored in an audit	Suggest changing to "the use of the protocol..." or "the application of the protocol to DNA data..." or some similar language	Accept with modification, sentence rewritten
77	4.3.3		E	the extent of work in DNA casework is not the relevant factor here; it's what the analyst will be doing regarding the use of CODIS	change "in DNA casework" to "in the use of CODIS" or other appropriate language	Accept

16	4.4		T	The competency test should be performed on sample(s) representative of the range, type, complexity encountered in casework. Standard 022, 4.3.2(a)(2) does contain a requirement that a practical test on a lab's analytical procedure be performed on samples representative of the range, type, and complexity typically analyzed by the lab but that requirement is important enough to be repeated here.	Add language: "Practical competency tests shall include samples representative of the range, type, and complexity typically analyzed by the laboratory."	Accept, added to 4.4.3
37	4.4.1		E	missing a dash between knowledge and based and wording is duplicated	"knowledge-based" and delete the second "shall meet"	Accept
55	4.4.1		E	Missing title of document for ASB 022	Add "Standard for Forensic Training DNA Analysis Training Programs"	Accept
79	4.4.1		E	delete "by the laboratory"; confusing since the use by the analyst should be tested; impossible to test the laboratory	delete "by the laboratory" (or substitute "analyst" for "laboratory")	Accept
80	4.4.1		E	extra words present	delete repeated words	Accept
38	4.4.2		E	Reword for clarity	May wish to consider rewording as follows: "The trainee shall successfully complete a knowledge-based test covering the critical information obtained during the training on the use of CODIS. The format of the test(s) shall be at the discretion of the DNA technical leader or comparable authority. The test(s) shall cover, at a minimum, the topics outlined i Section 4.2 and its subsections."	Accept
46	4.4.2		E	4.12 should be 4.2	Replace 4.12 with 4.2	Accept
47	4.4.2		E	This section is different than in previously ASB published training standards.	Make this section as consistent as possible with other training standards.	Reject, we believe it is cleaner to refer 4.2 and its subsections rather than repeat the list again
56	4.4.2		E	This section does not match previously published training standards.	Make all sections consistent throughout all training standards.	Reject, we believe it is cleaner to refer 4.2 and its subsections rather than repeat the list again
39	Bibliography		E	Capitalization of T in Technical leader is not used in earlier section	DNA technical leader	Accept
81	Bibliography		E	this document relies heavily on validation studies and protocol	suggest adding Standard 018, 020 and 040 to the Bibliography	Reject, references not directly applicable to training in CODIS
40	Bibliography (3)		E	Correct reference by removing ":"	National DNA Index System (NDIS) Operational Procedures Manual	Accept
47	4.4	Comment made on Std 091, and made across the series of documents.	T	This section should require that the criteria for passing a competency test be documented and established in advance.	Add a requirement that the criteria for passing should be documented and established in advance.	Accept, requirements added to 4.4.1 for all training standards