

Deadline of Submission of Comments: 17-Aug-23

Document Number: ANSI/ASB Std 080

Document Title: Standard for Training in Forensic DNA Reporting and Review

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
	Forward	E	This standard defines the minimum requirements for a forensic DNA analyst training program for...	This standard defines the minimum requirements <b>to be met</b> in a forensic DNA analyst training program for ..."	Accept
	Forward	E	The aim is to provide a framework for quality training <b>that will result</b> in consistency in the forensic DNA community.	The aim is to provide a framework for quality training <b>resulting</b> in consistency <b>within a laboratory and</b> in the forensic DNA community.	Accept
	Scope	E	consistency across training documents	This standard outlines the minimum requirements to be met in a training program for...	Accept
5	All	T	I disagree with group's rejection of Comment #32. It is unclear how requirements related to appropriately tailoring a report for the intended audience outside of the scope of report writing are outside the scope of training on report writing. I understand that laboratories often use "canned" report, but those reports often fail to communicate important information in a digestible manner	Training on reporting and reviewing should include instruction on the purposes of writing and reviewing reports, how the reports might be used by investigators and lawyers, what to record in a report as opposed to other documentation of the work, and how to write clearly. The standard should enumerate such criteria or principles.	Reject: The consensus body continues to agree that the request is out of scope for this document. How the report will be used is not appropriate for this document, as this is a training standard and is not the place for dictating how a lab develops its own reporting procedures.
10	4.1	E	Last sentence is difficult to parse, and meaning is unclear. It seems like you mean that the training program needs to encompass all areas of the laboratory's work, but that each employee is required only to be trained on material relevant to their duties? Alternatively, it can be read to mean that the training program must contain all info relevant to the laboratory plus that relevant to the trainee, but that seems redundant if the trainee is part of the laboratory, and we've already included all the laboratory-relevant info	The laboratory's training program shall include all requirements applicable to the work conducted by the laboratory. Individual employees' training programs must include all requirements relevant to their specific job duties, as detailed in ASB 022 4.2.3."	Reject: The proposed resolution is redundant as the title and scope of the document specify that this document is specific to DNA reporting and review. This standard and ANSI/ASB Standard 022 are specific only to Forensic DNA Analysis Training Programs, there is a difference between a whole training program and an individual's training plan.
4	4.2	T	Training on importance of communicating nonconformities and any other information that may impact reliability or interpretation of the results or credibility of the lab/analysts is critical. This is Brady/Giglio information and it is critical to learn how to communicate it both in testimony AND in reports. I disagree with the resolution of Comment 25 in the spreadsheet--a proposed resolution (if general) was provided. Additionally the resolution references 4.2.2.b.5 but (if I am reading the redlined document correctly), there is no longer a 4.2.2.b.5 in the document.	"Training on reporting and reviewing shall include training on how to properly report non-conformities and findings that may impact the validity, reliability, or interpretation of any analysis performed in the case, or which may impact the credibility of the analysis performed in the case."	Reject: How the report will be used is not appropriate for this document, as this is a training standard and is not the place for dictating how a lab develops its own reporting procedures. ANSI/ASB Standard 139, Reporting DNA Conclusions covers reporting. OSAC and the ASB continue to work on additional reporting documents.

3	4.2.1	T	There should be knowledge-based training on 1) how forensic DNA reports are used in the criminal justice system (who relies on these reports? Why? How are these reports distributed and when in the process? What kinds of decisions may be made using the information communicated in them? Why is it important to include limitations and expressions of uncertainty in a report as opposed to buried in a casefile; why is it important to indicate underlying data etc is included in the casefile ) and on the communication of scientific results more generally. The comment #32 on the adjudicated spreadsheet already largely captured these ideas , and the "out of scope" rejection should be reconsidered by the working group.	insert after "e" under 4.2.1" "literature and/or lectures on the use of forensic DNA reports in the criminal justice system by stakeholders, to include the following: how forensic reports are distributed to stakeholders; importance of statements that the report does not contain underlying data in the testing and is insufficient to independently review and analyze the conclusions; why statements of limitation and uncertainty are important; why reporting of nonconformities is important"	Reject: How the report will be used is not appropriate for this document, as this is a training standard and is not the place for dictating how a lab develops its own reporting procedures. ANSI/ASB Standard 139, Reporting DNA Conclusions covers reporting. OSAC and the ASB continue to work on additional reporting documents.
11	4.2.2b3	E	Not easily auditable--split the two requirements into sub-bullets	report issuance, including: i) policies on providing verbal results, and ii) determining when the report is final;	Accept with modification: sentences were split into items 3) and 4).
17	4.2.2 c) 3	E	missing ; at the end	add ;	Accept.
12	4.2.2c4	E	Unclear meaning; not auditable	1) Split timing of reviews and release of any results into separate sub-bullets. 2) Is "timing for each review" referring to the laboratory's internal policy for how long reviews should take? Also, verbal results are covered in 4.2.2b3, but all pre-report results are covered here in the tech review section, so I'm not sure how those differ. Is it here because such results may need to be reviewed before release? It seems like It should be in one place or the other (I vote for 4.2.2b), and cover all results communicated before results are final, whether communicated verbally, by email, or by other means	Accept with modification: 4) was divided into 4) and 5). Also in 4) "timing" was revised to "order" for clarification.
13	4.2.2c5	E	"comments and corrections" are not documentation requirements	"documentation requirements for each review; including <b>documentation of</b> comments and corrections..." OR "documentation requirements for each review; including <b>those related to</b> comments and corrections..."	(now 4.2.2 c) 6) Accept: added "documentation of"
18	4.2.2 c) 5	E	extra period before the ;	delete extra period	Accept.
6	4.3	T	I disagree with the group's rejection of comment #25. Laboratory analysts must be trained to share information that gives parties a fair warning of the need to further investigate the materials in the casefile	Training on reporting and reviewing shall include training on how to properly report non-conformities and findings that may impact the validity, reliability, or interpretation of any analysis performed in the case, or which may impact the credibility of the analysis performed in the case	Reject: How the report will be used is not appropriate for this document, as this is a training standard and is not the place for dictating how a lab develops its own reporting procedures. ANSI/ASB Standard 139, Reporting DNA Conclusions covers reporting. OSAC and the ASB continue to work on additional reporting documents.

8	4.3	T	I maintain that there needs to be a section on training about the importance of including information that might be harmful to the customer, to provide fair notice to look further.	"Training on reporting and reviewing shall include training on how to properly report non-conformities and findings that may impact the validity, reliability, or interpretation of any analysis performed in the case, or which may impact the credibility of the analysis performed in the case."	Reject: How the report will be used is not appropriate for this document, as this is a training standard and is not the place for dictating how a lab develops its own reporting procedures. ANSI/ASB Standard 139, Reporting DNA Conclusions covers reporting. OSAC and the ASB continue to work on additional reporting documents.
1	4.3.1	T	I'm not sure what "observation of a trained analyst performing report writing and review..." will do. Just watching an analyst write a report doesn't seem very practical (watching someone write?). Not seeing the benefit of this without instruction going on while doing it.	"At a minimum, the practical portion of the training program shall include a demonstration with instruction by a trained analyst performing report writing and review at least once..."	Reject with Modification: The lead in paragraph for 4.3.1 includes the "practical instruction" which could be written and/or verbal. 4.3.1 modified for consistency across all training documents in response to a comment in standard 079. "at least once or until clearly understood" moved to the end of the sentence.
14	4.3.1	E	Run-on sentence. Last part after "clearly understood" should be a separate sentence if retained (see suggestion to right), or eliminated, as it is already covered by 4.3.2	At a minimum, the practical portion of the training program shall include the observation of a trained analyst performing report writing and review at least once or until clearly understood. The observed report writing and review shall use DNA data and reports representative of those processed by the laboratory.	Accept with Modification: 4.3.1 modified for consistency across all training documents in response to a comment in standard 79. "at least once or until clearly understood" moved to the end of the sentence.
9	4.4	T	The competency of the analyst is integral to a determination of the reliability of the reported conclusions.	"There should be a clearly defined, easily understood, and communicated process for obtaining the results of competency testing for the analyst(s) involved in the case."	Reject: the proposed resolution is outside the scope of a training document for reporting. Obtaining the results of competency testing is related to discovery, not training.
7	4.4	T	I disagree with the group's rejection of comment #11. Inasmuch as the analyst is part of the analytical chain, their demonstrated competency is not a mere personnel matter, but is part of the documentation supporting each individual analysis performed in a case.	The results of competency testing for the analyst(s) involved in the case should be made available to all stakeholders.	Reject: the proposed resolution is outside the scope of a training document for reporting. Obtaining the results of competency testing is related to discovery, not training.
15	4.4.1	E	"the application of" is superfluous. Second "test" should be "test(s), to echo the first instance	The competency component of the laboratory's training program shall demonstrate knowledge-based and practical competency in report writing and review as used by the laboratory. The format of the test(s) and the criteria for passing the competency test(s)...	Accept.
2	4.4.3	E	ISO/IEC 17025 requires a laboratory define what "successfully complete" means. A lot of labs miss this.	"The trainee shall successfully complete (as defined by the laboratory's policy) a practical competency test..." OR Add a "NOTE The laboratory must define how they determine what "successfully complete" means.	Accept with modification: (as defined by the laboratory's policy) added to 4.4.2 and 4.4.3 in all training documents for consistency. sentence structure edited for consistency across all training documents.
16	4.4.3	E	In the last sentence, "test" should be followed by (s)	Practical competency test(s)	Accept.