

Deadline for Submission of 26-Aug-19

Document Number: ANSI/ASB Standard 088

Document Title: General Guidelines for Training, Certification, and Documentation of Canine Detection Disciplines

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

#	Section	Type of	Comments	Proposed Resolution	Final Resolution
1	0	E	does the word "scent" / "odor" also making reference to vapor?		Answer: Yes, it does reference vapor. Please refer to Section 3: Terms and Definitions.
2	4.1.2	E	And in the training of the canine handler there is no mention of training the handler in understanding reinforcement training.	I raise this because the primary cause that a dog false alert lies in the deficiency of the handler understanding of reinforcement.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
4	All	T	Approved		Accept
5	All	E	Approved		Accept
13	General		<p>We request that the working group give consistent comment resolution for similar comments. There are several instances where we and other commentators made similar comments yet the responses to the comments differed and sometimes contradicted each other. In addition, some of our comments were addressed in resolutions to other comments, but this information was not conveyed in the responses, making it very difficult to determine if/how our comments were resolved.</p> <p>We also ask that you recognize that rejecting a proposed resolution does not mean that you are resolving the problem identified in the comment and that your response to any comment fully address the points raised in the comment and proposed solution. There are instances where the response misses the crux of the comment. Here are three examples:</p> <p>Example 1            Comment: "I hope that future specific documents will address how a "competent trainer" is defined."            Response: "These comments will be provided to TR 025 WG to be considered when this TR is revised sometime soon."            Comment: "Will another standard define what "competent canine trainer" is? What qualifications are needed to be deemed competent? Can an individual that has just been certified conduct a training?"            Response: "Defined in TR 025."            Comment: "There is no information given on how canines are rewarded during the training process. What protections are built into the standard to ensure canines are not rewarded for false alerts during the training process?"            Response: "A competent trainer determines canine's reward."            This set of comments speaks to the lack of information describing the initial training of the canine. Details of this process may belong in a separate standard, but it's reasonable that these questions be asked since this document outlines the initial training of the canine. The responses give no indication that standards for training canine trainers exist or if OSAC or ASB are working on documents to answer these questions.</p>	<p>If a proposed solution to a given comment is not accepted, please answer all questions posed in a comment rather than only addressing the proposed solution. Please direct commentators to other resolved comments when there are similarities in the comments made. If questions that exceed the scope of a standard up for comment can't be answered, please be consistent in letting us know that these questions may/will be answered in future documents.</p>	<p>Reject: There is no proposed resolution presented by the commenter. Please note these issues were identified in SWGDOG documents now being revised by OSAC and will be submitted to ASB. As per responses to your specific questions, these issues are being addressed in several discipline specific ASB documents being worked by Working Groups.</p>

13 Continued		<p>Example 2</p> <p>Comment: "I would make most (60-75%) of the test double blind. Assessments of basic skills of the K9 team can be made in the single blind portions of testing (or in a separate "basic skills" test) including during a "staged" odor recognition/discrimination (includes "distractor" odors) test much like the "NORT" for explosives dogs."</p> <p>Response: "Please refer to discipline specific documents. This suggestion is not logistically feasible."</p> <p>Comment: "The default testing method for operational proficiency in canine detection should be double blind assessment. Single blind testing should only be used for the evaluation of prospective dogs that are being considered for training in canine detection disciplines."</p> <p>Response: "The document provides a sequential listing of the types of assessments that can/should be conducted. Single-blind assessments, when conducted properly, are a useful tool to assess a canine team's performance. The only difference between a double blind assessments is that neither the canine handler, nor the assessor, nor any individual present with the canine team shall know the correct outcome of any portion of the assessment, including whether the search area(s) is a blank or includes a trained odor/scent. A combination of the two is considered a standard practice."</p> <p>This set of comments addresses the need for double-blind testing. The responses were unresponsive, inconsistent, and didn't make sense.</p>			
13 Continued		<p>Example 3</p> <p>Comment: "Because it is a critical part of the development and success of the Canine team, I feel that statements should be made concerning the selection of the K9. There has been much discussion on breeding and selecting working K9s. In my experience one of the primary causes of poor performance or lack of success (training and/or deployment) is the selection of a K9 not suitable for the discipline."</p> <p>Response: "Canine selection is currently being addressed in a separate document that will provide applicable guidelines for this important process."</p> <p>Comment: "If successful certification requires the canine team to achieve at least a 90% positive alert rate, the initial training of the canine team should require a positive alert rate equal to or higher than 90%. The standard does not indicate what is necessary for a dog to pass training to move on to certification. In fact, 4.2.1.9 allows the training process to go on indefinitely."</p> <p>Response: "Canine training is an indefinite process."</p> <p>While these two comments appear to be different, they are indeed similar. They both address performance of a canine at the initial training stage and when a canine should no longer be considered for this line of work. Based on the response to the first comment in this set, it appears that another standard may list the criteria need for a canine to pass initial training, rather than allow a poorly performing dog to continue in a training program indefinitely.</p>			
14	General	T/E	<p>Phrases like routine training, maintenance training, and day to day training are used throughout the standard but these terms are not defined in this document. Routine training and maintenance training are defined in TR 025, but day to day training is not. It seems fitting that these training scenarios would be defined and that routine and day to day training would be described in this document. For example, standard 6.3 states that a certifying official shall not be routinely involved in the day to day training of the canine team being evaluated. It makes sense that an assessor wouldn't have this responsibility, but it's not stated anywhere in the document who is or what they are expected to do. Standard 7.2 adds to this confusion since it seems like routine training or day to day would mostly come from a handler. Since the word "solely" gives no indication how much or how little training needs to come from an outside source, at one point does all the handler training become bad practice? Furthermore, is supervised training with a competent handler? TR 025 defines terms but doesn't provide any context on the requirement for these training scenarios.</p>	<p>Add the three aforementioned terms to section 3. Please detail the standards associated with these routine and day to day training. If these training scenarios will be explained in a future document, let us know. If these terms are indeed the same, please clarify that they can be used interchangeably.</p>	<p>Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.</p>

15	4.1.2	E	In our first round of comments we proposed the removal of scent/odor detection from legal aspects to be covered in training. This comment was rejected without what appears to be serious consideration or explanation. In the latest draft of the standard, section 4.1.2 was revised to include "b. the acquisition and processing of odor/scent by the canine" in addition to "c. education on the various environmental conditions affecting odor/scent dispersion." These two categories are important to cover in training because the handler/expert needs to be aware of the science behind the process of using a canine for search purposes. A handler's ability to explain this is the reason they would be deemed an expert and be called to testify in court. The ability to discuss this information is not a "relevant legal aspect," it is scientific or technical expertise that distinguishes the handler from a lay expert. Following the logic of the explanation given for the rejection of our comment, the canine's ability to acquire and process scent is something that would also need to be considered a "relevant legal aspect." It isn't, and we agree a canine's detection ability should not be included under "relevant legal aspects" for training. Relevant legal aspects are caselaw and other matters relating to report preparation and testimony for the courts. We reiterate, "effect of odor/scent dispersion" does not belong in section 4.1.2.i).	If it is your intent to convey specific requirements regarding testimony pertaining to the handler's area of expertise within 4.1.2.i, a proposed solution is to add "the communication of the dispersion, acquisition, processing, and limitations of odor/scent detection by the canine for potential court proceedings." Any solution offered needs to be clear that the communication of this information is for court purposes and the limitations of the science must be articulated.	Reject: Effect of odor/scent dispersion is a topic that can be touched upon by an expert witness when testifying. This document is not providing specific requirements, only general guidelines considerations.
16	4.1.2	T	The suggestion for additional cases to be added to what was standard 4.1.5.2 was rejected. In turn the working group removed Florida v Harris from the text of the standard and just simplified the language to "relevant caselaw." We agree with the removal of the case from the text since one case should not be elevated over any other case in which a canine's use has been called into question, but the edit, the explanation given, and having Florida v. Harris as the only case in the bibliography does not address the points made in our comment and proposed solution. Relevant caselaw is not agency/organization specific as all agencies/organizations within the a state or jurisdiction are expected follow the applicable laws and rulings. The rationale for rejecting our comment doesn't hold up. Furthermore, to truly be considered an expert, all practitioners, especially those independent practitioners that work in multiple states, should be knowledgeable of federal and state laws outside of their primary jurisdiction. A training standard should encourage practitioners to seek as much information on their respective discipline rather than restrict it.	We listed two additional canine cases out of many that could have been added to the bibliography. This standard doesn't cover Daubert, Frye, or Carmichael which are the primary cases that establish the expectations of expert testimony. This standard as written is lacking in conveying the need to know basic relevant legal aspects. We strongly encourage the working group to add the cases we originally suggested and others, as well as caselaw on expert witness testimony to the bibliography. We are not calling for every case where canines were used to be listed, but greater range of cases should be covered since this is a general training standard.	Reject: The canine handler should consult with their federal, state and local jurisdictions to determine cases important to their locality and specific canine discipline.
17	4.1.2	E	The addition of cognitive bias to the standard is a change we support fully. However, cognitive bias is not a legal aspect; it is well established in the scientific literature and is part of the scientific process. Cognitive bias is something that an expert would need to be aware of during their collection and analysis of data and how exposure to information can influence an investigation, a point that is not captured in the definition offered. Being aware of information, environmental conditions, or personal/emotional conditions that could influence a handler or a canine's decision making is something that must be acknowledged and addressed well before said individual enters a courtroom.	Education on aspects of cognitive bias should be moved to its own subsection under 4.1.2 rather than being a subsection under 4.1.2.i.	Accept. See 4.1.2 - moved item from i to f.
18	4.1.2	E	What is meant by "preparation of legal documentation"? Is this specific to reports only or does it encompass all documents that could be legally requested like case files, documentation collected at the time of the search, and all training records?	Provide examples of the documents.	Reject: Examples of documents should be in line with federal, state and local jurisdictions based on the canine handler's locality and specific canine disciplines.
6	5.5.1.2.7.2	T	This line is aimed more at detection dogs and not at live (i.e. area or trailing). For the purposes of any area or trailing test, the handler **should** know the number of target objects as it impacts the test itself and evaluations of are a much larger scale than 'detection' tests.	Revise wording for area/trailing detection dogs	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
7	5.5.1.2.7.4	T	Similar to above, for area/trailing the requirement for one blank search can significantly impact the testing event itself. For area, this can be somewhat alleviated based on a larger test area with fewer (i.e. one) subject. For trailing, this sentence implies they must to one start without a trail to follow. This significantly adds to the requirements of a test event.	Revise to "at least one blank search area for disciplines requiring more than one test based on the discipline specific standard"	Reject: See canine discipline specific document(s) for tracking and trailing. The statement is accurate.

20	5.4	E	Use of the word desire implies hope or wishing something would happen. Standards set expectations that need to be met.	Conjugations of the word desire need to be removed from the standard. The definition of operational proficiency can be changed to "training conducted beyond the initial training of a discipline, designed to maintain a high level of competence or skill by ensuring the team's capability to perform expected or required tasks." 5.4 can be changed to "The expected or required outcome of the search is the correct identification of the number and placement of the target odor/scent by the canine team." 5.5.1.2.7.1 and 5.5.1.2.7.3 can be worded like 5.5.1.1.7.3.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
19	5.5.2.5	E	Standard 6.2 makes double-blind testing a requirement. For consistency, instances where "should" is used in relation to double-blind testing ought to be changed to "shall."	Standard 5.5.2.5 Should be changed to "The canine team shall be required to complete a double-blind assessment at a minimum of every six months." Standard 6.9 should be changed to "At least one certification component shall be a double-blind assessment. Certification components that are not double-blind shall be single blind assessment (e.g. odor/scent recognition and operational assessment) or non-blind (e.g." obedience and control assessment).	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
8	6.1	T	NASAR remains probably the largest organization certifying dogs teams. Their certificates are good for 2 years. NSDA's certificate is good for two years. Recommend, if required, that area/trailing certifications extend to 2 years and that more applicable LE standards (explosives, narcotics, HR if you want to group that in there) be for every year.	Rewrite if 2 years is allowable for certain disciplines, or all SAR disciplines.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
21	6.3/6.10	E	Standards 6.3 and 6.10 refer to day-to-day training. From the context it seems that day-to-day handling, or possibly training and handling, is what is meant.	Please verify the correct term to be used in these standards, and make any revisions needed. Also, as an editorial suggestion, please be consistent in the usage of the hyphenated or unhyphenated term.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
9	6.5	T	would argue dogs must often be outside of an area based on scent condition, particularly wilderness. Recommend adding excessively outside of area	Reword b) Allowing canine to work excessively outside of the search area	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
10	6.9	T	For area or trailing, the concept of multiple assessments, some single and some double significantly adds to the requirements and time needed to do a test. If the idea here is one large double blind assessment for those disciplines, you can strike this comment. If the idea is that these disciplines have multiple assessments, some blind and some double blind, I believe this will detrimentally impact the ability to give tests in any kind of timely manner and should be reconsidered. If for those disciplines you would accept one single blind assessment (what is currently done for most testing) then the comment to the right applies.	Recommend caveat for certain disciplines or reference discipline specific requirements if single blind assessment is valid.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
22	6.11	T/E	It's not clear who is responsible for writing the corrective action plan, does this responsibility fall on the assessor, a competent trainer, or the agency/organization the team belongs to?	Add a standard to section 6 explaining who creates the corrective action plan.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
11	8	T	This entire section is not applicable to the live disciplines (area/trailing). Recommend adding, as applicable somewhere here.	Rename Section Training Aid Storage and Handling for non-live disciplines.	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.

12	9.4	T	Training records should not be standardized with the organization - some handlers are more proficient with digital, some prefer hardcopy. If you mean to say training and discipline related records should contain standardized data within the organization, that allows the flexibility but does not require a team to develop standardized paperwork for their training logs and to give their handlers more flexibility.	Rewrite to say: Within an organization, training and discipline related records should contain standardized data	Reject: Per ASB instructions with a recirculation, comments on a recirculation are only accepted on revised text within the document, comments made to text not revised from the original public comment period will not be accepted. This specific comment is not on the redlined words/sentences of this document, therefore not open for comment. This item may be addressed in the future versions of the document.
3	9.6 e; 9.14	T	I view this as potentially "problematic", in that law enforcement agencies that require or utilize 3rd party assessors/certifications to keep "deficiency records" on law enforcement canine teams, have no control over 3rd party safeguarding of law enforcement proficiency ratings/assessments. Law enforcement may have strict protocols or SOPs regarding performance ratings of their officers as far as open source information, dissemination control, and safeguarding of information from nefarious dissemination. Culpability will be on the 3rd party possessing such documents and security may not be guaranteed. "Deficiencies and corrective measures noted for future training", also seem to be beyond the scope of an evaluator/certification authority's duty to provide; it should be incumbent on the handler's trainer or organization to provide remedial action plans, not that of a 3rd party evaluator not involved with the day to day training of the team. Furthermore, 9.14 states that, "Record retention <b>policy</b> shall be determined by the canine team's organization guidelines.". Would this also mean "certification records" as mentioned above? I assume for many agencies (especially federal) that a 3rd party agency beyond the law enforcement agency's dissemination control would not be approved to possess federal training documents.	Re-address or remove section 9.6e, or, ensure that potential conflict between 9.6e and 9.14 is clarified to protect law enforcement sensitive records or established internal policies that may conflict with these sections.	Reject: Section 9.14 supersedes 9.6 e.
			Document should be accepted - a lot of good work was put into this document by the adjudication working group.		Accept
			I would assume this definition of "cognitive bias" comes from a technical reference and has had approval from the OSAC Human Factors Committee. "A mental error caused by a person's simplified information processing strategies; it does not result from any emotional or intellectual predisposition toward a certain judgment but rather from subconscious mental procedures for processing information." After reading it a few times, I think I understand it. But the goal of these documents is to have handlers, trainers, organizational management, judges, attorneys, juries, etc. understand the document. It is odd that the definition relies heavily on what it is NOT. Why not say "A mental error resulting from inadvertent, subconscious thought processes." or something equally simple that achieves HFC approval.		Accept