Deadline for submission of comments: September 12, 2020
ASB Standard 102, Standard for Verification of Source Conclusions
in Toolmark Examinations

#	Section	Type of Comment	Comments	Proposed Resolution	Final Resolution
6	1 Scope	T	This should refer to opinions not conclusions (OSAC preferred term). Also, how can the verification process be truly blind if examiners are verifying only source conclusions as opposed to any opinion (e.g. inconclusive, unsuitable)?	Change to require verification of all opinions	Reject with modification: Conclusion is the appropriate terminology for this standard; as written, source conclusion includes opinion of different source (elimination), inconclusives, and opinion of same source (identification); added a definition for "source conclusion" for clarity; the scope does not reference blind verifications.
19	3.2 and 4.1		I have two comments/concerns: "3.2 task‑relevant The information that is necessary for drawing conclusions: a) about the propositions in question;" The term "propositions in question" is particularly vague and may be misconstrued to imply multiple types of conclusions that are not necessarily appropriate or under the umbrella of source conclusions. "4.1 Extent of Verification All (100%) of the primary examiner's source conclusions in firearm and/or toolmark comparisons shall be subjected to the verification process." Can be fairly interpreted in multiple ways: 1-verification of identification conclusions only 2-verification of identification and elimination conclusions (regardless of reason, class vs individual characteristics) 3-verification of all comparisons regardless of determination (including inconclusive and unsuitable determinations) I disagree with #3 as it wildly exceeds the type of work done and generally accepted in most accredited labs; either way the lack of specificity is a problem that should be resolved.		3.2 comment: Reject: This term is defined in the provided reference of footnote #a. 4.1 comment: Accept with modification: added definition for "source conclusions" to clarify that means opinion of different source (eliminations), inconclusives, and opinion of same source (identifications). Added the following paragraph to 4.1 "In certain situations, a determination of the value/no value of toolmarks present on an item is necessary. For those situations, the FSSP shall have a policy delineating when and how those determinations are verified." to clarify verification requirements for value/no value.
22	3.2 3.3 and 4.2		Section 3.2 3.3 - The footnote letter (a) appears at the end of section c) for that term and makes appear as though that reference only applies to section c) of that definition. While that is technically the end of the definition, it may be more appropriate to include the footnote letter (a) reference with the actual title "task-relevant." It was difficult to tell whether the current placement of the footnote reference (a) is dictated by the ASB style guide. Section 4.2 - "The FSSP shall conduct a risk assessment[3]" with reference to the Kersholt article in the bibliography. That article does not appear to address "risk assessment" so it is unclear if the reference # is incorrect (perhaps intended to refer to #2 ISO 17025) or if there is some other reason to cite this article. Also, the Kersholt citation is incorrect...the article was published in 2010 instead of 2016. bliography - Items 1, 2, and 4 do not appear to be referenced anywhere in this standard. Therefore, their intended relevance is unclear.		3.2 3.3 comment: Accept - footnote designation was moved to definition title 4.2 comment: Accept - the reference # was changed to "2" to reference the ISO 17025 in the bibliography and 2016 was changed to 2010 Bibliography comment: Reject: references listed were used in the creation of this document and were determined by the working group to be relevant to the document

#	Section	Type	Comment	Suggested Change	Resolution
1	4.1	Technical	Clarification	"100% of the primary examiner's source conclusions shall be subjected to the verification process." I would request additional clarity to resolve if every **case** with a source conclusion is verified (with no task-irrelevant information shared). For example, a case involving 15 well-marked cartridge cases have only one representative comparison between two cartridge cases verified. If they're not well marked, two (or more) comparisons may be verified—at the discretion of the primary examiner. Is that something that would be documented as part of the risk assessment (representative verification)? Or is the standard moving to a system where every **comparison** with a source conclusion requires verification? I read it as the latter and would comment that if mandated, that could impact a laboratory's ability to provide timely analysis.	Reject: This standard requires all source conclusions be verified, not a representative sample of items/comparisons or a representative sample of casework.
2	4.1	T	The requirement for verification of all source conclusions is an important strength of this proposed standard.	No change needed.	Accept
8	4.1 Extent of verification	T	THis currently requires verification only for source conclusions. Again, that would not be truly blind.	Change to require verification of all opinions and refer to as opinions not conclusion.	Reject: Conclusion is the appropriate terminology for this standard; as written, source conclusion includes opinion of different source (elimination), inconclusives, and opinion of same source (identification); this section refers to all verifications, not just the proportion of blind verifications.
12	4.2 ("The FSSP shall conduct a risk assessment[3] to determine the percentage of verification to be conducted in this manner. The FSSP shall document and retain the risk assessment record justifying the portion of cases requiring this level of verification.")	T	If this is a standard why is it left it up to the FSSP to set the %; why not set a minimum and a best practice?		Reject: It may not be practical to perform 100% blind verifications in all laboratories; the language of risk assessment was adopted from ISO 17025.
9	4.2 (requiring retention of risk assessment record)	T	Should require documentation & retention of underlying data as well	Change to "data and record"	Accept with modification: adjusted sentence to include "and supporting data".
13	4.2 (same as 7)	T	It's not clear what justifies blind verification for only a portion. Wasn't this concern part of theDC firearms issues? We would remove "for a portion" and delete the highlighted portion about the risk assessment.		Reject: It may not be practical to perform 100% blind verifications in all laboratories; the language of risk assessment was adopted from ISO 17025.
7	4.2 Method ("Whenever practicable, the primary examiner shall not assign their own verifier and the verifier should have no prior knowledge of the primary examiner's source conclusions.")	T	How is requiring this only when "practicable" consistent with this being a standard (as opposed to a best practice). If this is a standard, then blind verification should be required and any deviation from a blind procedure should be documented and noted in the report.	Delete "whenever practicable" and make clear that the verifier should also not know who the examiner is.	Reject: It may not be practical to perform 100% blind verifications in all laboratories or to prevent the verifier from knowing who the primary examiner is; the language of risk assessment was adopted from ISO 17025.
3	4.2	T	Specifying a verification method that is blind to the primary examiner's source conclusions and to contextual information is extremely important and welcome. It is not clear why this should apply to only a portion of verifications.	If there are situations in which it is necessary for verifications to be unblinded, the standards should explain the rationale and specific criteria for determining which cases require non-blinded verification. Blinded verification is by far the best practice and should be the default. Deviation from best practice should require justification.	Reject: It may not be practical to perform 100% blind verifications in all laboratories; the language of risk assessment was adopted from ISO 17025.
4	4.2	T	The sentence calling for risk assessment to determine a percentage of cases for blind verification is unclear. What is the goal of pre-determining a percentage of cases for blind vs non-blind verification? What kind of risks are to be assessed, and how is the risk assessment to be conducted. The cited paper by Kerstolt does not discuss risk assessment.	This section needs to be reconsidered. If there are specific reasons for performing some verifications without blinding, those reasons need to be articulated clearly. A lack of clear criteria leaves this critical decision up to the subjective judgment of individual FSSPs. Any procedures for evaluating risks need to be validated.	Reject with modification: the reference # was changed to "2" to reference the ISO 17025 in the bibliography; it may not be practical to perform 100% blind verifications in all laboratories; the language of risk assessment was adopted from ISO 17025.
5	4.2	T	The Kerstolt et al. reference is not an appropriate reference for risk assessment or for estimating the effects of blinded vs non-blinded verifications in real casework. The experimental part of the study was involved participants who knew they were being tested, and the study was severely underpowered for estimating small effects. All of the cases in the real-world case study were blind verifications. This is not an appropriate design for evaluating the effects of non-blind verification.	Although it is not clear what kind of risk assessment the standard is trying to achieve, the OSAC Human Factors Task Group has substantial expertise in this area. We would be happy to consult as needed.	Reject with modification: the reference # was changed to "2" to reference the ISO 17025 in the bibliography
14	4.2	T	Somewhere in here it should be added that if ever if verification is non-blind in any way (i.e., knows the examiner, knows the examiner's conclusions, etc.) that information must be documented and disclosed.	Add suggested language here or elsewhere	Reject with modification: the document does not require all verifications to be blind; verification information is required to be documented and the style of verification (blind/non-blind) was added to the example in the 4.5 bullet "method of review".

10	4.3 Item identity check	T	This seems inconsistent with the concept of blind verification. It should not be the examiner who has this responsibility, it should be someone else, perhaps the tech lead. Who the examiner is is itself task irrelevant information that could lead to cognitive bias.		Reject: the identity of the item is to be checked by the verifier, regardless of whether the verification is blind or not, in order to ensure the verifier knows which item they are examining.
11	4.4 Resolution ("The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier.")	T	Change to "The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier **that requires the information be fully documented and disclosed."**	Change to "The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier that requires the information be fully documented and disclosed."	Accept with modification: added "that requires the arbitration information be documented in the case record."
15	4.4 Resolution of conflicts	T	Why is this left to the FSSP entirely? Are there no suggested best practices in the literature? We would suggest asking the OSAC human factors committee for guidance on this issue. Also at a minimum this should be a written policy that requires documentation of results, resolution and the basis for the resolution and the fact of a difference should be included in any report issued.		Reject with modification: The word "policy" implies it is written; added "that requires the arbitration information be documented in the case record."
16	4.4 Resolution of conflicts		While I firmly believe that all source conclusions should be verified (inconclusive, unsuitable, class eliminations) as a part of good quality assurance. However, going along with other comments, maybe we should provide another option for class eliminations.		Reject: the document requires verification of all source conclusions, which includes class eliminations; the working group determined this is appropriate.
17	4.4 Resolution of conflicts		While I appreciate that verification of class eliminations will not typically be a valuable use of time for most of us, I'd like to make a counterpoint. I've seen things that make me suspect that some charlatan experts like to highlight nonsignificant differences in a comparison and represent them as if they were an elimination on class characteristics. I'm under no illusion that requiring verifications would wholly extinguish the practice, but the added difficulty of finding a second person with credentials sufficient to seem authoritative and a willingness to put themselves behind the same conclusion for the same reasoning, and the additional means to impeach their conclusions might at least put a damper on it.		Accept
18	4.4 Resolution of conflicts		I agree that class eliminations should be exempt from verifications.		Reject: the document requires verification of all source conclusions, which includes class eliminations; the working group determined this is appropriate.
20	4.4 Resolution of conflicts		I agree Comment #19, particularly regarding verifications on inconclusive and unsuitable. I also feel that eliminations based on class characteristics should be defined differently (screening?) and without the requirement for verifications.		Reject: the document requires verification of all source conclusions, which includes class eliminations and inconclusives; the working group determined this is appropriate.
21	4.4 Resolution of conflicts		Based on the comments 17-19, I am in agreement and believe the suggestions should be addressed.		Reject: the document requires verification of all source conclusions, which includes class eliminations; the working group determined this is appropriate.
23	4.4 Resolution of conflicts		Based on 17-19 comments, I believe we should address class exclusion scenarios and "proposition" wording.		Reject: the document requires verification of all source conclusions, which includes class eliminations; the working group determined this is appropriate; the "proposition" wording is part of the "task relevant" definition and more information can be found in the cited reference.
24	4.4 Resolution of conflicts		Based on #19 comments, I suggest those issues be resolved.		Reject: the document requires verification of all source conclusions, which includes class eliminations; the working group determined this is appropriate.

Deadline of Submission of Comments: 20-Mar-23
Document Number: ANSI/ASB Std 102
Document Title: Standard for Verification of Source Conclusions in Toolmark Examinations

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

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Editor or Working Group Review	Final Resolution
2	3/4.1	T	Comments from the previous round demonstrated different readers may read the term "source conclusion" in 4.1 and interpret the criteria for when verification is required significantly differently. Comment 19 in the original commenting period was resolved by defining source conclusion, which I believe to be valuable addition to the standard; however, I think given the lack of clarity the addition of the definition does directly relate to the requirement in 4.1 and respectfully request this comment be considered. The changed text (addition of definition) directly impacts the text in 4.1 even if the text in 4.1 was not actually revised. Why would a forensic service provider (FSP) not have the same ability to evaluate risk and determine the extent of verification within the organization as they would with blind verification? Reading the foreword, it states, "This document takes into consideration the current state of professional practices and scientific research on contextual bias and confirmation bias." How was the current state of professional practices determined? Much like many other commentors, this does not seem in line with current professional practices and an FSP may have a significant increase in work to be performed if they choose to adopt this standard. Is there data that demonstrates risk decreases with increased verification (e.g., including eliminations on class characteristics as many commentors identified as a concern) as opposed to focusing verification on the comparisons that are the riskiest of having differing opinions? Is there data that identifies what opinions there is most frequent disagreement on between primary examiner and verifier? This type of data may be dependent on each FSP independently and, for this reason, the FSP should determine verification criteria with consideration to the risk in their organization of when verification is mandatory.	Change source conclusion in such the definiton does not apply to all opinions rendered (e.g., source conclusion is an opinon of same source) in order to allow FSPs to determine other times when verification is performed OR change 4.1 to allow for FSPs to determine when verifications must be performed (e.g., same source opinion or different source opinion) and allow FSPs to evaluate risk for their resources.	Reject: The working group believes all source conclusions, as defined to mean opinions of same source, opinions of different source, and inconclusive opinions, should be verified; the allowed methods of verification remain flexible under the standard.	Reject: The working group believes all source conclusions, as defined to mean opinions of same source, opinions of different source, and inconclusive opinions, should be verified; the allowed methods of verification remain flexible under the standard.
4	4.1	T	Extent of verification: Last time we commented that the standard as written required verification only for source conclusions, which would not be truly blind. The redline edits do not address this problem. Also it is not clear what "determination of value/ no value" is referring to. Is it suitability for comparison? Is it inconclusivity? Are the terms being used interchangeably and if so, should be consistent throughout the document. If not, then clarification as to what each term means is necessary. It is not clear what step in the analysis it correlates to. Additionally, "certain situations" is vague. This does not provide clarity as to when verification is appropriate or what the circumstances are that may give rise to a "situation" where verification is warranted. While it is commendable that the standard requires labs to have a policy, without more specifics, the standard won't help reduce interlab variability. Additionally, the verification section does not require blind verification. Same comment and rationale as previously submitted.	Change to require verification of all opinions, not just source conclusions, and refer to as opinions not conclusion.	Reject: the definition of source conclusion is included in section 3 of the document (3.2 specifically); this document is describing verifications of source conclusions and not determinations of value (value and no value are not terms used in this document), but nothing in this document precludes a lab from having a policy/procedure requiring verifications of value determinations; the wording of "certain situations" is not in this document; the document requires a portion of verifications be conducted in a blind manner with the FSSP conducting a risk assessment to determine what portion is appropriate for their customers.	Reject: the definition of source conclusion is included in section 3 of the document (3.2 specifically); this document is describing verifications of source conclusions and not determinations of value (value and no value are not terms used in this document), but nothing in this document precludes a lab from having a policy/procedure requiring verifications of value determinations; the wording of "certain situations" is not in this document; the document requires a portion of verifications be conducted in a blind manner with the FSSP conducting a risk assessment to determine what portion is appropriate for their customers.
1	4.2	T	ISO/IEC 17025:2017 is not an appropriate reference for risk assessment. The phrase risk assessment is used one time in ISO/IEC 17025:2017 and it is in a note; it is not defined nor described. The note in 8.5.2 even specifies that ISO/IEC 17025 does not require any formal process for risk management. Standard documents that describe risk management include ISO 31000 and IEC 31010. I would recommend using a more generic phrasing like ISO/IEC 17025 does or changing the reference if the intent on providing a reference is to provide guidance.	Possible change to depart from the formalized language of risk assessment: The FSSP shall conduct a risk assessment[32] to determine the percentage of verification to be conducted in this manner. The FSSP shall document and retain the risk assessment record to The FSSP shall evaluate the risk associated with not conducting the verification in this manner to determine the percentage that will be verified by this method. The FSSP shall document and retain this evaluation. alternatively, provide a different reference	Reject with modification: the section information for risk assessment was added to the Bibliography; additional information about risk is incorporated within the document.	Reject with modification: the section information for risk assessment was added to the Bibliography; additional information about risk is incorporated within the document.
3	4.2	T	Method ("Whenever practicable, the primary examiner shall not assign their own verifier and the verifier should have no prior knowledge of the primary examiner's source conclusions.")Last time we asked: how is requiring this only when "practicable" consistent with this being a standard (as opposed to a best practice). If this is a standard, then blind verification should be required and any deviation from a blind procedure should be documented and noted in the report. The redline version merely adds a requirement that supporting data be recorded. Adding "and supporting data" does not cure the fundamental problems with this section as articulated in our prior submission. The recommendations for 4.2 (4.2 (requiring retention of risk assessment record); 4.2 ("The FSSP shall conduct a risk assessment[3] to determine the percentage of verification to be conducted in this manner. The FSSP shall document and retain the risk assessment record justifying the portion of cases requiring this level of verification."); 4.2 (same as 7)) remain unaddressed.	Delete "whenever practicable" and make clear that the verifier should also not know who the examiner is.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner; it is impractical to require that a verifier not know who the primary examiner is.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner; it is impractical to require that a verifier not know who the primary examiner is.
5	4.2	T	(requiring retention of risk assessment record): see above	Change to "data and record"	Reject: the language of the risk assessment retention is clear.	Reject: the language of the risk assessment retention is clear.
7	4.2	T	("The FSSP shall conduct a risk assessment[3] to determine the percentage of verification to be conducted in this manner. The FSSP shall document and retain the risk assessment record justifying the portion of cases requiring this level of verification."): see above		Reject: the language of the risk assessment retention is clear.	Reject: the language of the risk assessment retention is clear.
8	4.2	T	See above; still not clear what justifies blind verification for only a portion. Wasn't this concern part of theDC firearms issues? We would remove "for a portion" and delete the highlighted portion about the risk assessment.		Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner.
9	4.2	T	Somewhere in here it should be added that if ever if verification is non-blind in any way (i.e., knows the examiner, knows the examiner's conclusions, etc.) that information must be documented and disclosed.	Add suggested language here or elsewhere	Reject: section 4.5 requires the documentation requested in this comment, with the exception of whether the verifier knows the identity of the primary examiner; it is impractical to require that a verifier not know who the primary examiner is.	Reject: section 4.5 requires the documentation requested in this comment, with the exception of whether the verifier knows the identity of the primary examiner; it is impractical to require that a verifier not know who the primary examiner is.
6	4.4	T	Resolution ("The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier that requires the arbitration information be documented in the case record."): Our previous suggestion was to change to "The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier **that requires the information be fully documented and disclosed."** The redline version adds that it "be documented," but such a critical difference requires full documentation and disclosure (that would include, for example, documentation of results, fact of the difference, resolution, and the basis for the resolution).	Change to "The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier that requires the information be fully documented and disclosed."	Reject: The language of sections 4.4 and 4.5 is sufficient.	Reject: The language of sections 4.4 and 4.5 is sufficient.
10	4.4	T	Resolution of conflicts: Why is this left to the FSSP entirely? Are there no suggested best practices in the literature? We would suggest asking the OSAC human factors committee for guidance on this issue. Also at a minimum this should be a written policy that requires documentation of results, resolution and the basis for the resolution and the fact of a difference should be included in any report issued.		Reject: The language of sections 4.4 and 4.5 is sufficient.	Reject: The language of sections 4.4 and 4.5 is sufficient.
11	4.5	T	non-blind verification should not be used. If blind verification is impossible, this should be stated, as well as the reason it is impossible.	Require blind verification.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner.
12	Table of Contents	T	The ambiguity as to what will be added or completed prior to publication renders the comment period meaningless. All content including TOC must be completed, and vetted during the review period. If a standard is not ready to move forward, then the subcommittee should take the time it needs to complete it so that OSAC members, affiliates and those submitting public comments know what it is they are reviewing.	Retract the standard or delete the TOC.	Reject: the TOC cannot be finalized until comment resolutions allow the remainder of the document to be finalized; the TOC is only missing page numbers.	Reject: the TOC cannot be finalized until comment resolutions allow the remainder of the document to be finalized; the TOC is only missing page numbers.

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Editor or Working Group Review	Final Resolution
13			Voting yes on the redline changes, as the specific subject of this ballot. I do think additional clarifications are warranted. Specifically: Section 3.3(c). A number of very important terms are used without definition (in this stadnard nor in the referenced document). "Correct approach...," "accepted analytical method...," and "competent analyst..." are all undefined and subject to variable interpretation. This level of ambiguity seems inappropriate for a standard.The term "verification," although it is the subject of the standard, is undefined -- though an implied definition is present in A3.4 ("verifier"). I agree with previous round comments that A4.2 could be better clarified to emphasize that FSSP determination of percentage applies only to blind verifications. Happy to discuss further		3.3c comment-Reject: the language is provided by the source referenced for the term task-relevant "verification" term comment - Reject: a specific definition of verification is unnecessary as the context of the document is sufficient to understand the term. 4.2 comment- Reject: the language is sufficient.	3.3c comment-Reject: the language is provided by the source referenced for the term task-relevant "verification" term comment - Reject: a specific definition of verification is unnecessary as the context of the document is sufficient to understand the term. 4.2 comment- Reject: the language is sufficient.
14			I have three major issues with this standard:(1) It continues to allow non-blind verification despite evidence that it is less likely to capture real disagreement between examiners. The one study on verification found that examiners in open verification disagreed almost 30% less than those conducting blidn verification. 29.Mattijssen EJAT, Witteman CLM, Berger CEF, Stoel RD. Cognitive biases in the peer review of bullet and cartridge case comparison casework: A field study. Sci & Justice. 2022. 60(4): 337-346. doi: 10.1016/j.scijus.2020.01.005. Even if blidn verification will not be used for 100% of all cases, this standard should specify when it is most appropriate and mandate it occur in those settings. That is what the friction ridge community has done in its most recent bpr on verification. For example it could be mandated in cases where no gun is available for comparison, or where it is a single bullet or catridge case in question, or when some specified limited area alone is available to compare. Any given that essentially zero validation exists at all for toolmark examination outside firearms blind verification should be mandatory in 100% of those cases.(2) This standard simply leaves it to labs to develop a conflict resolution and documentation policy. that is not acceptable.(3) This standard cites to inappropriate and poorly designed research (kersholt) but ignores better designed and more relevant research (Matijessen cited above) in its bibliography. That is unacceptable.		Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner; the working group supports conflict resolution procedures be developed by the FSSP; the working group reviewed numerous suggested literature and feels the bibliography is appropriate.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner; the working group supports conflict resolution procedures be developed by the FSSP; the working group reviewed numerous suggested literature and feels the bibliography is appropriate.
15			I too have the same concerns. 1) Verifications should all be blind so as to remain unbiased. 2) Staff and availability of staff should not be an acceptable reason for something not being verified. Why nothing about 100% verification? (Tech and admin reviews perhaps). 2) Good idea to have a guidance for resolution (unless this will be a separate standard?) 3) More relevant research needs to be cited. Concept is good and the need for it tremendous; just not crazy about how it is being executed in this standard.		Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manners; all source conclusions are required to be verified (just not all have to be blind); the working group supports conflict resolution procedures be developed by the FSSP; the working group reviewed numerous suggested literature and feels the bibliography is appropriate.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manners; all source conclusions are required to be verified (just not all have to be blind); the working group supports conflict resolution procedures be developed by the FSSP; the working group reviewed numerous suggested literature and feels the bibliography is appropriate.
16			I echo the above big three concerns about this standard: 1) non-blind verification allowed without guidance as to when blind should be mandated; (2) lack of guidance in developing conflict resolution policies; and (3) failure to cite relevant literature re: impact of non-blind format on verifications in bibliography. Examples of more detailed guidance can be found in the friction ridge subcommittee's BPRs, not only for situations where blind verification is required, but also for conflict resolution processes and documentation.		Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner; the working group supports conflict resolution procedures be developed by the FSSP; the working group reviewed numerous suggested literature and feels the bibliography is appropriate.	Reject: the working group supports FSSPs conducting a risk assessment to determine what amount of verifications shall be conducted in a blind manner; the working group supports conflict resolution procedures be developed by the FSSP; the working group reviewed numerous suggested literature and feels the bibliography is appropriate.

Deadline of Submission of Comments: 18-Mar-24
Document Number: ANSI/ASB Std 102
Standard for Verification of
Document Title: Source Conclusions in
Toolmark Examinations

Comment #	Text Line # (s)	Document Section	Type of Comment E-Editorial T-Technical	Current Document Wording	Proposed Revision	Revision Justification	Final Resolution
1		3.2		Ballot comment	I now have a question about whether 3.2 "source conclusions" is consistent with the configuration of other standards, e.g., 100.		Reject: the definition of source conclusion is word for word the same in other documents
2		4.1/4.4		Ballot comment	My abstention is a reflection of my concern about the language removed from 4.1 balanced with my appreciation for the language added to 4.4.		Accept
3		4.1	T	Although the standard only addresses source conclusions, the deleted language leaves labs able to (and perhaps even implicitly encouraged to) have a verification requirement for source conclusions but not for other conclusions (e.g. "of no value"), which would not be truly blind.	Add language making clear that the lab should have verification requirements for source conclusions that mirror the requirements for other conclusions so as to preserve the objectivity of the verification.		Accept with modification: language was added to 4.1 and 4.2 to address value/no value determinations.
4		4.2	T	This language (requiring blind verification re: original source conclusion only where "practicable") is still a dealbreaker for many LTG members. Why not require that non-blind verification be justified, with reason documented, and explain what would be a good enough justification? This seems critical to making verification meaningful.	Require that non-blind verification be justified, with reason documented, and explain what would be a good enough justification.		Reject: the document requires the FSSP to conduct a risk assessment and retain that documentation
5		4.2	T	Why leave it to the labs to have a risk assessment, and if so, why not require documentation of the risk assessment criteria? It's ASB's responsibility (like the latent print community has) to give at least some guidance. So if you are not going to always do blind you should do so in "high risk cases" ie single mark comparisons, damaged bullets, database cases, no gun cases, at minimum.	Replace discretionary risk assessment by each lab wiht requirement of blind verification and avoidance of task-irrelevant information at minimum in "high risk cases" ie single mark comparisons, damaged bullets, database cases, no gun cases.		Reject: the document requires the FSSP to conduct a risk assessment and retain that documentation
6		4.4	T	In the following: "The FSSP shall have a policy for the arbitration of differences in source conclusion(s) between the primary examiner and verifier that requires the arbitration information be documented in the case record. The arbitration information shall be descriptive enough for an outside expert to be able to follow the steps that occurred and discern all conclusions (original, intermediate, and final) reached by each examiner throughout the process. Please replace "source" with a term that encompasses disagreements between a source opinion, an exclusion, and an inconclusive opinion. Differences between a source opinion and an inconclusive opinion have significant consequences in a criminal proceeding and should be treated with the same level of care and documentation. In addition, per the FSSB guidance on reporting and testimony, include a requirement that the fact of a disagreement be noted in the report. (If this sort of discrepancy would already be included as a difference, just make that clearer).	Differences between a source opinion and an inconclusive opinion have significant consequences in a criminal proceeding and should be treated with the same level of care and documentation. In addition, per the FSSB guidance on reporting and testimony, include a requirement that the fact of a disagreement be noted in the report.		Reject: Source conclusion is defined in the document: 3.2 source conclusions An opinion of same source, an opinion of different sources, or an inconclusive opinion

7		4.4	T	Re: the language: "arbitration information shall be descriptive enough for an outside expert." Thank you for providing information for review by an outside expert - we think, however, the language as is is too vague. Rather than say it should be descriptive enough, it should say it must include, at a minimum, (1) a description of each step taken by each FSP who examined the item; (2) each conclusion reached, including the timeline of the conclusion(s) (e.g., original, intermediate, and final)... [We may be missing some things that need to be included--we're just trying to work off of what they have listed here and make it clear that the standard needs to provide specific requirements, not general guidance about giving a description.]	Too vague as written, although critical concept that's great to include... (see suggestions)		Reject: the substance of the section is sufficient to address the bulk of the concerns and a more specific document detailing the arbitration process is currently being drafted at the OSAC
8		4.4		Ballot comment	I appreciate the change made to section 4.4 regarding documentation of conflict resolution. But I also believe that it was ill-advised to remove section 4.1's discussion of the need to verify at least certain value determinations. Because of that mixed opinion I am abstaining.		Accept with modification: language was added to 4.1 and 4.2 to address value/no value determinations.
9		throughout	T	The last part of the sentence in each section "reached by each examiner" should conform to the first part of the section (which specifies "examiner and verifier.") Otherwise, the requirement of "reached by each examiner" may be understood to exclude those only acting as verifiers.			Accept with modification: in section 4.4, the final sentence was changed to read "each examiner/verifier"

Deadline of Submission of Comments: 9-Sep-24
Document Number: ANSI/ASB Std 102
Document Title: Standard for Verification of Source Conclusions in Toolmark Examinations

Comment #	Text Line # (s)	Document Section	Type of Comment E-Editorial T-Technical	Current Document Wording	Proposed Revision	Revision Justification	*For Working Group use only, not to be completed by commenter.*	
							Working Group Resolution	Final Resolution
1			T	LTG's previous comments were mostly rejected without much explanation. We have the same concerns we expressed in the last redline version that we do not believe were adequately addressed and reiterate our comments that were rejected or accepted only with modification.	same proposals as submitted in the last round of comments	same justifications as previously submitted int he last round of comments	Reject: No additional suggestions were offered. The WG reviewed previously rejected comments and their resolutions. The resolutions and the justifications were sufficient.	Reject: No additional suggestions were offered. The WG reviewed previously rejected comments and their resolutions. The resolutions and the justifications were sufficient.