

Deadline of Submission of Comments: 30-Jan-23

Document Number: ANSI/ASB Std 143

Document Title: Standard for Technical Review in Friction Ridge Examination

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolutions
7	overall	T	We made this comment last time around but it applies to the recirculated version as well: It's not clear why this was changed from a "best practices" document to a "standard." The document lacks specificity required to be a standard because it merely requires that FSPs have policies and procedures in place. The ultimate focus of a standard is not on the mere presence or absence of procedures but on the scientific supportability of the methods governing those procedures. Absent information about what is scientifically supportable, the standard has little meaning because there are in fact no specific criteria that would show the examiner or someone reviewing their work whether the procedures are adequate or produce reliable results.	This should remain "Best Practices Recommendations" rather than a "Standard."	Reject: Draft was changed from a BPR to a Standard as a result of multiple comments received during the first round of public comment. The standard specifies minimum requirements for a technical review process. Based on ASB definition, it is more appropriate as a standard than a BPR. The decision to change the previous draft from a BPR to a STD was also reviewed by the ASB board.
8	overall		The requirements listed do not ensure quality or consistent which are listed as requirements of a standard in the ASB Manual, "provides for common and repeated use, rules or characteristics for activities or their results, and is aimed at the achievement of the optimum degree of order in a given context." In order for a Technical Reviewer to "... ensure there is appropriate and sufficient support for the actions, results, conclusions, opinions, and interpretations" (as stated in the definition of a TR), then parameters for 'appropriate and sufficient' need to be developed, validated and articulated to practitioners. Approving this document first is putting the cart before the horse.		Reject: This standard outlines the requirements for conducting a technical review, but not the requirements for how to conduct a technical review. The working group and consensus body have previously discussed whether to expand this document to include the "how" requirements, but opted not to leave the standard as is and can follow up with a BPR for the "how" if desired.
2	3	E	The use of examiner in the document refers to "competent friction ridge examiner." Since they are referring to the same thing, the definitions should be combine to create a single definition for "examiner."	Merge the definitions of "examiner" and "competent friction ridge examiner."	Accept
3	3.3	T	"Competent" may be misleading in the definitions list as training/experience may not necessarily lead to competency unless the FSP specifies how assess the knowledge/skills/abilities.	Change definition title to "trained examiner", or provide specific and detailed criteria for how competency is assessed	Reject - Outside the scope of this standard. Competency requirements will be addressed in STD 014 Training.
4	3.8	T	Note 3 - use of "independent" when referring to an opinion that has had access to prior decisions etc is misleading.	Add criteria that the use of "independent" should not be used in all cases except where a verification was made without ANY prior knowledge, conclusion or decision	Reject: Outside of scope for this standard. See BPR 144 – Best Practice Recommendations for the Verification Component in Friction Ridge Examination for verification recommendations. Terminology is consistent with current draft of TR 016.
5	3.8	T	Our original comment to the earlier draft was: Not clear why "open" verification is as legitimate as "blind." This is still a problem, and it relates to the recirculation because current section 4.3 allows technical review to occur concurrently with admin review and verification (and so means verification would necessarily not be blind). Thus, the current draft uniquely raises the issue of non-blind verification. Again, the standard should make clear that blind verification is best practice and should be followed except in special circumstances that are described in the standard.	Change to require blind verification or justify special circumstances under which non-blind is sufficient and why, given the bias concerns and given the new section 4.3	Reject: Outside of scope for this standard. See BPR 144 – Best Practice Recommendations for the Verification Component in Friction Ridge Examination for verification recommendations. Terminology is consistent with current draft of TR 016.
6	4.6	T	Our original comment to the earlier draft was that "Nonconforming work should be in the initial report sent to legal stakeholders engaged in plea negotiations and not only in the "case record" if that is different." The current version simply requires labs to have a policy. This is insufficient for legal consumers of these reports; nonconforming work must be documented in the initial report.	Require that nonconforming work be documented in the report as well as the case record (fine to cross-reference to the report writing standard for this purpose if that makes sense?).	Reject: Outside of scope for this standard. See STD 167 Standard for Reporting Written Results from Friction Ridge Examinations for reporting requirements. Cannot reference STD 167 because it is not yet published.
1	Annex A	T	The technical reviews should make sure that the examiner's notes are properly dated and signed.	Add a question, under the notes section, similar to the following: "Are the notes properly dated and signed."	Reject: Annex A provides one example of how technical reviews can be documented. Because it is just an example, an FSP can add or delete elements as needed.