

25-Jan-21

ASB Std 145, Standard for Consultation during Friction Ridge Examination

#	Section	Updated Sections	Type of Comment	Comments	Proposed Resolution	Final Resolution
34	Entire document		T	We all concur this whole document is excessive. It creates a needless layer of bureaucracy. It is far too prescriptive. The final result will create secretive consultations or will have us drowning in paperwork. This can be covered in the conflict resolution document.	Withdraw document.	Reject: Conflict resolution is a fundamentally different concept; it occurs after a conclusion has been made and the file sent for verification/TR
24	Title		t	I do not feel that documenting consultations is necessary since the initial examiner is ultimately responsible for what is done in a case (and the conclusions rendered).	make this a best practice, not a standard	Reject: Documentation is necessary for transparency and possible conflicts that may arise.
40	forward		technical	distinction between "should" and "shall"	Other OSAC/ASB documents contain mostly "shoulds" in regard to what an examiner "should" do. Most of the "shalls" in other documents are in regards to documenting the actions if they are performed. In this document, most of the actions themselves are "shalls," and most of those would be difficult, if not impossible, for small units to comply with. There seems to be almost no room for discretion. Small units would be especially hard pressed to comply, even though they had plenty of safeguards to prevent errors in practice, documentation, or reporting.	Definitions for Shall and Should have been removed per new ASB Manual for documents.
19	1		t	I do not believe 'conflict' needs to be defined since it is not used within the document, other than to say conflicts are not addressed. It would be better to define more pertinent terms, like conflict or verification.	remove 'conflict'	Reject: It is important to state that this document does not apply to conflict resolution.
25	3		T	The document needs a definition for consultation. The definition needs to include the content of a consultation which elevates it from being more than a discussion.	The definition could include that consultation is a conversation about technical data related to friction ridge examination.	Accept with modification: term and definition for "consultation" was added. See section 3.2.
35	3		E	Despite being the sole focus of this Standard, its terms and definitions section nowhere provides a definition for "consultation." In other areas the Standard alternatively refers to consultation via concepts of "discussion" or "interaction" between examiners on a series of potential topics. But by failing to provide an overarching definition of consultation, this Standard only compounds the acknowledged ambiguity of the term. compounds the elsewhere-in-the-standard acknowledged ambiguity of the term.	Provide a definition for "consultation" in Section 3. We suggest: "Any discussion or interaction between examiners (whether or not working at the same FSP) regarding specific friction ridge samples or an any aspect of an examiner's work on a specific friction ridge case assignment."	Accept with modification: term and definition for "consultation" was added. See section 3.1.
1	3.1		T	I object to the term "Conflict", a more appropriate term is "Difference of Opinion". Conflict implies a clash, quarrel or dispute. Latent print conclusions are opinions and often with additional information or consultation, the opinion is changed. There is no conflict, there is discussion between two examiners focused on the data that supports the opinions rendered.	Replace term "conflict" with "Difference of Opinion"	Reject with modification: This terms is consistent with the terminology used in the Conflict Resolution document that is being finalized by ASB's Friction Ridge CB. Section 3.1 (term and definition for "conflict") was deleted.
20	3.1		t	I do not believe 'conflict' needs to be defined since it is not used within the document, other than to say conflicts are not addressed. It would be better to define more pertinent terms, like conflict or verification.	remove 'conflict'	Accept
41	3.1		technical	may lead to shaded reporting	Section 3.1 would seem to imply that if two or more examiners initially disagree during a consultation, verification, or technical review, but then agree following a discussion, there is no conflict. In that case, no conflict resolution would need to be followed as long as one examiner convinces the other or the other agrees to just go along, for whatever reason. Agree to agree = no conflict. "Go along to get along."	Accept with modification: Section 3.1 (term and definition for "conflict") was deleted.

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26	4		T		An introductory statement explaining the reason/purpose of a consultation is needed in the document. The explanation should why the primary analyst is seeking a consultation and who is qualified to be consulted. This statement should be placed before the current standard 4.1. It seems like a consultation should be taking place between equally competent or more experienced friction ridge examiners.	Reject with modification: Definition for “consultation” was added to section 3, as well as the definition for “examiner”, and section 4.3 specifies who may be consulted (“Consultation consists of varying levels of discussion between examiners...”)
31	4		T	This document may eliminate the communication that helps to fine tune an examiners skills through out their career.	Limit the shall statements to decision/interpretation changes made from consultations.	Reject: No specific suggestion made. Recommendation lacks specificity as to what it is referring to.
6	4.1		E	add "after" between until and they	Should read ...To avoid any potential bias from the examiner, these observations shall not be provided to the consultant until after they have completed their observations.	Accept
22	4.1		t	Section 4.1 says these observations shall not be provided to the consultant until they have completed their observations. I do not understand how a consultation is different than a blind assessment (hence the need to define consultation and verification, and perhaps blind verification/assessment-). To me, a consultation is a conversation between two people, not an independent assessment.	define consultation, verification and blind verification. And state how a consultation is different from a blind assessment.	Accept with modification: "Verification" and "blind verification" terms are not used in this document. The term and definition for "consultation" was added to section 3.
36	4.1		E	This section attempts to address the potential for cognitive bias by requiring that “the examiner has recorded their preliminary observations in the case record.” But its references to “recording” and “preliminary observations” are too vague. Would it be enough for an examiner to merely record that they believe they might have an identification but are not sure? Imagine a case where an examiner believes an identification conclusion is appropriate based largely on features in a delta and so is reasonably worried about pattern force issues and the discriminating power of the features. How specific must an examiner be as to what their preliminary observations are for the result of their consultation to be transparent, must they include annotations, their initial lean towards a particular source conclusion, etc.? And should the standard treat that situation differently from one in which the issue is not merely how discriminating are the features I am confident in, but instead one of whether the features observed are really there at all? Unless this Standard defines in advance what constitutes an examiner’s preliminary observations, and varies that definition based on the stage that the examiner has reached (suitability, source conclusion, etc.) as well as the question the examiner hopes to pose during consultation, documentation is likely to vary to an unacceptable degree.	Define (in this section or above in terms and definitions) what it means to record preliminary observations. That definition can and should be sensitive to the fact that the observations, and accordingly what is recorded, is likely to vary based on both the stage of ACE-V the examiner has reached, as well as the specific questions necessitating consultation.	Accept with modification: Note added to clarify with example to section 4.1.
2	4.2	4.3	T	how does this differ from performing a blind verification? How does this impact the potential for asking for assistance in an open manner? This makes all case related conversations very restrictive and formal. This type of issue, if that severe to the case circumstances/suitability decisions, can be more appropriately addressed as a blind verification. Allow for more open discussion between examiners, not regimented documentation of every posible encounter. Sharing and discussion makes us all better at what we do. Do not hide examples behind a curtain of secrecty under the guise of "preventing bias". By requiring this of every interaction, every examiner feels like every situation presented is a test.	Remove the second sentence from the paragraph	Reject Section 4.2 provides a discrete list of when documentation is required. Every interaction is not required to be documented.
17	4.2	4.3	t	this document refers to a draft OSAC document (note: whether it is labeled as a draft or not, it is still a draft). Since the draft document will likely change, the public cannot assess this document in context to the draft document.	remove the reference to the OSAC draft in two places and remove it as a reference. Per FSP policy is good enough. Or, define complex instead of referring to a draft document.	Accept: References to OSAC drafts were removed and replaced with definitions for “complexity”.

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27	4.2	4.3	T/E	What levels of consultation do not require documentation? While a consultation and a discussion are the same thing, the terms cannot be used interchangeably in this standard because the terms have different connotations and required/unrequired actions.	Examples of conversations do not require documentation need to be added to the standard. Additionally, consider the following edit "Conversations between examiners consists of varying levels of discussion."	Reject: Examples that require documentation are defined in 4.3. All others are not required.
42	4.2.a	4.3	technical	clarification needed	Section 4.2.a ; If I simply hand a lift to another examiner and ask, "Do you see anything there?" and the other examiner says, "Only a few faint ridges of no value," and I reply "Yeah, that's what I thought." The way this is written, that brief conversation rises to the level of a full consultation.	Reject: Yes it rises to the level of consultation. If consultation was needed it is not a basic decision.
43	4.2.b	4.3.b	technical	clarification needed	Section 4.2.b implies that If the AFIS Technician initially decides not to run a particular latent for any reason, but later a latent print examiner doing comparisons asks the technician to run one through AFIS, that would constitute a consultation at the least and a conflict at the most. If the AFIS Tech explains his reason for not initially running it, but then agrees to do so anyway, then it constitutes a consultation that removes it from conflict status. Is that the meaning of this section?	Accept with modification: The term and definition for "consultation" was added to section 3. Also, the definition for "examiner" was added to section 3 as well.
7	4.2(b)	4.3(b)	T	introduced new term "sample" for continuity of language should use "friction ridge impression"	Should read ... b) assessment of the utility of friction ridge impression for an automated search;	Accept
8	4.2©	4.3 C	T	instead of "friction ridge features" possibly use "observed data" which is more inclusive and defined	Should read ... c) presence or absence of specific observed data during the analysis or comparison;	Accept
23	4.2-d	4.3 C	t	there are differences of opinion of what a simultaneous impression is and therefore it needs to be defined.	define simultaneous.	Reject: An examiner should consult their organization's policy.
33	4.2e & 4.8	4.3 e & 4.7		See Standard for Examining Friction Ridge Impressions & see Standard for Examining Friction Ridge Impressions are both referencing documents that are not published.	Add to the statement "when published."	Accept with modification. Reference to the document was eliminated and definitions for "complexity" were added to Section 3
9	4.2(f)	4.3(f)	T	similar to 4.2© should use "observed data" instead of "friction ridge features"	Should read ... f) specific observed data used for comparison and/or searching efficiency such as target groups, anchor points or others	Accept
10	4.3	4.4.	E	seems to be the incorrect verb ? If we are suggesting that they should be documented then say that. Use "documented" rather than "considered"	Should read... In-depth interactions involving the following should be documented:	Accept with modification: This sentence was modified as following: "Documentation of in-depth interactions involving the following should be considered:"
28	4.3	4.4.	T	Information on an examiner's decision-making process is very important to the legal community. If a consultation takes place where examiners decide not to document the details of the conversation, it should be a requirement that this interaction is documented.	This statement needs to be changed to a shall statement. The reasons and thought process behind a decision for inaction are equally important as those that require action and should be subject to scrutiny if necessary.	Reject: Section 4.3 states items that shall (requirements) be documented and Section 4.4 provides guidelines, not requirements. An individual FSP is free to have more stringent requirements.
11	4.3(b)	4.4. b	T	There is always distortion present in any impression. As written would have to document every discussion about every impression.	Change to ... b) presence of considerable distortion resulting from deposition pressure, substrate, or matrix effects having a bearing on opinions or conclusions rendered;	Reject with modification: 4.4 is already limited to in-depth interactions not all interactions. Removed " presence of" from front of section 4.4 -b.
12	4.3(d)	4.4.d	E	Insert "presence of"	Should read... (d) presence of limitations in image quality such as contrast, focus, camera angle/position, noise, image artifacts; and	Accept with modification: edit was made as recommended but the "presence of" was omitted.
13	4.3 e	4.4. e	E	insert "utilized"	Should read... e) latent print detection and development technique(s) utilized	Accept
5	4.4	4.2	T	4.4 How do agencies with only two examiners meet this standard?	Update to "A consultant who has viewed both known and unknown friction ridge samples will not be used as the verifier for that examination when possible."	Reject: This is appropriately written as a requirement. It is up to the FSP/agency to decide how and if they want to comply with this as a voluntary standard
14	4.4	4.2	T	Consider deleting this requirement or re-wording to state what we actually mean.	Could read... 4.4 A consultant who has viewed both questioned and exemplar impressions shall not be used as the verifier for that examination. OR 4.4 A consultant who has advised an examiner on any of the aspects listed in 4.2 and 4.3 should not be used as the verifier for that examination.	Accept with modification: "samples" was replaced by "impressions". This section is clear to its meaning.
29	4.4	4.2	E		The standard should acknowledge that verification can take place during technical review, so this policy should also extend to technical review. This addition can be added to the current statement or a note can be added.	Reject: Verification and technical review are two distinct processes. They many be done concurrently but are not the same thing.

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32	4.4	4.2	T	The shall in this section may limit the abilities of numerous small departments throughout the country. Those sections with 2 or less examiners will have a difficult time getting work verified.	Change this statement to "should".	Reject: This is appropriately written as a requirement. It is up to the FSP/agency to decide how and if they want to comply with this as a voluntary standard
37	4.4	4.2	E	This section precludes the use of a consultant as a verifier but does so only when the consultant has been exposed to both known and unknown samples. Verifiers in the friction ridge discipline can and should be called on to provide a second opinion regarding both final source conclusions as well as suitability determinations. For that reason alone, exposure to even unknown samples could bias a verifier's opinions if they acted as a consultant on the very question of suitability. But even in situations where a consultant has looked at only the unknown (say for suitability) there are dangers if that consultant is then a verifier for a final source conclusion based on a comparison to a known. Their conversations with the primary examiner may, for example, have induced a bias about whether particular features are really artifacts of distortion, which could seriously impact their final conclusion.	Preclude consultants from acting as verifiers on any case involving friction ridge samples they consulted on (both knowns and unknowns).	Reject: Solution is not specific and too broad.
44	4.4	4.2	technical	difficult to impossible in some labs	Section 4.4: In a small unit with only two latent print examiners, this mandate would be hard, if not impossible, to follow all the time. Even with three LPEs, it could present difficulty much of the time, for example, when a supervisor with other responsibilities is the third LPE.	Reject: This is appropriately written as a requirement. It is up to the FSP/agency to decide how and if they want to comply with this as a voluntary standard
21	4.5		t	I believe 4.5 is a repeat of 4.2 (both say to document - 4.2 adds when to document). It is unnecessary to have this stated twice.	remove 4.5 and combine where to document information into 4.2 (in the case file/record).	Reject: Section 4.3 (previously 4.2) states the types of interactions that must be documented and section 4.5 states where it must be documented.
30	4.5		E	ASB Note: Commenter is referring to comment #27 that reads: "What levels of consultation do not require documentation? While a consultation and a discussion are the same thing, the terms cannot be used interchangeably in this standard because the terms have different connotations and required/unrequired actions." and commenter is referring to this recommendation: "Examples of conversations do not require documentation need to be added to the standard. Additionally, consider the following edit "Conversations between examiners consists of varying levels of discussion.""	This statement does not work if the standard uses discussion and consultation interchangeably without specifying the interactions that do not have to be documented. See comment for 4.2.	Reject: We agree these terms should not be interchangeable but we are not using them interchangeably. See section 3.1. for clarification.
38	4.6(b)		E	This section should include more specific guidance on the type of documentation required. For some consultations it may be enough to generally note the topic and resolution. For example an examiner may be between "identification" and "some support for identification" based on a large number of features but questions about how discriminating said features really are. Consultation might result in an examiner deciding to be conservative and stay with "some support" or to dismiss their concerns and say identification. In either cases, transparency would require noting the topic (the discriminating power of features say around a delta) and the resolution (I dismissed my initial concerns and concluded that sufficient features were present to justify an identification. But in situations corresponding to suitability or the presence / absence of specific features, such information likely is not enough for full transparency and feature annotations would be necessary. If an examiner marks five features during analysis, goes through a consultation, and then removes three features and adds two more, it would be important to document all those changes as well as the fact that they occurred because of consultation as opposed to individual reconsideration, exposure to a known , etc.	The ASB should provide greater specificity regarding the substance of consultations that must be documented. In some cases topic/ resolution likely suffices. But others will require far more detailed documentation. The ASB should specify those scenarios in advance to include, at minimum, any situation in which an examiner changes feature annotations, their conclusions as to suitability and/or source, or quality assessment. In those scenarios the ASB should require additional documentation. The ASB should consider expanding something like the GYRO method of colors for feature annotations to capture the issues just discussed. For example blue could be used for features removed, added, or moved due to consultation.	Reject: The document in its entirety addresses this concern. This section is specific to documents for consultations with the criteria defined in 4.3 and 4.4 The FSP's agency can require more as needed.

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39	4.6(c)		E	This section allows for the use of initials to identify consultants. Initials are often difficult to read and require stakeholders to take additional steps to ascertain identity which consume needless time.	In addition to any other unique identifiers (employee number and so forth) require at minimum that consultants be identified by first and last name.	Reject with modification: This section was revised to read: "usable identification for the examiners involved". Type of identifier is defined by FSP policy.
15	4.7	deleted	E	Similar to earlier should use "friction ridge impression" not "friction ridge sample"	Could read... 4.7 Each consultant involved in a consultation shall document their findings independently of the original examiner, including the markups of the friction ridge impression where appropriate.	Accept with modification. This section has been deleted and all other references to "sample" have been replaced with "impression".
45	4.7	deleted	technical	clarification needed	Section 4.7: In every instance of consultation, no matter how minor, "shall" add his/her own personal documentation of the consultation to the case record. Even mention or discussion and detail of the consultation recorded by the case examiner is insufficient to satisfy the mandate. Is that the meaning of this?	Accept with modification: Section 4.7 has been deleted and section 4.8 (now section 4.7) clarifies this concern.
3	4.7 and 4.8		T	par. 4.7 indicates that the consulting examiner will document their findings independently. Par. 4.8 indicates that this may be done as part of the initial examiner's notes. How can both be accomplished? Or does par. 4.7 mean that if there are multiple consultants, each consultant's results must be documented independently? If there are multiple consultations, can they be included in the initial examiner's notes, or would this automatically constitute a "complex" situation and require independent documentation?	provide better clarification for when it is appropriate to be included in the initial examiner's notes, vs when it must be separate.	Accept with modification: Section 4.7 has been deleted and section 4.8 (now section 4.7) clarifies this concern.
4	4.7 and 4.8		T	4.7 currently reads as though the "markups of friction ridge sample" are required based on the statement of "shall" in 4.7 which contradicts information in 4.8 that states that documentation is based on the extent and nature of the consultation	Remove "including the markups of the friction ridge sample" from 4.7	Accept with modification: Section 4.7 has been deleted and section 4.8 (now section 4.7) clarifies this concern.
16	4.8	4.7	E	Use "examiner" not "analyst". Use "markups" not "screenshots"	4.8 Depending on the nature and extent of the consultation, the consultant may satisfy the above minimum documentation requirements by including the information within the notes of the initial examiner. In consultations involving complex examinations (see Standard for Examining Friction Ridge Impressions), a separate set of notes, annotations, or images (e.g., markups) generated by the consultant shall be included.	Accept with modification: "Examiner" is now used throughout this document. "Markups" was added to the example.
18	4.8	4.7	t	this document refers to a draft OSAC document (note: whether it is labeled as a draft or not, it is still a draft). Since the draft document will likely change, the public cannot assess this document in context to the draft document.	remove the reference to the OSAC draft in two places and remove it as a reference. Per FSP policy is good enough. Or, define complex instead of referring to a draft document.	Accept with modification. Reference to the document was eliminated and definitions for "complexity" were added to Section 3
46	4.8	4.7	technical	clarification needed	Section 4.8: While there may be workarounds for some LIMS programs to keep multiple examiners' notes in the formal record, in some systems all that can be done is to attach a separate PDF or word document outside the examiner's worksheet. This will add significantly to each examiners time spent recording observations and conversations of little or no significance. Is that the intent of this paragraph?	Reject: The intent is to document everyone's contribution. No specific suggestion was made.