

Deadline for public comments submission: May 16, 2022

ASB Std 153, Standard Practices for Proficiency Testing for Forensic Toxicology Laboratories and Breath Alcohol Programs

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
3	3	E	Other tox standards used footnotes for the source of definitions. ASB Manual F.3.3. states to use footnotes to reference text copied from another document.	Use footnotes to cite the source of the definition	Reject: Formatting of the final version is done by the ASB office staff to meet ASB's Style Guide and requirements.
5	4.1 and 4.2	E	The title separates out "forensic tox labs" and "breath alcohol programs". These 2 requirements only state "forensic tox lab".	add "and breath alcohol program" to both to ensure it is clear that the requirements apply to both	Accept.
7	4.2, 4.3	E	The section break appears to break up what should be the first sentence of section 4.3	Move the section break so that the first sentence of 4.3 reads, "While intra-/interlaboratory comparisons may not meet the definition of proficiency tests, they are valuable for laboratories to assess the reliability of test results."	Reject. The section was reformatted into two paragraphs.
1	4.2-4.3	T	As redlined, (1) proficiency testing is required; (2) inter/intralab comparisons can be done instead of externally provided proficiency testing; but (3) inter/intralab comparisons are not proficiency tests. Not clear how these 3 can all be true.	Change definition of proficiency testing to include inter/intralab comparisons, or change to require external proficiency testing, or change to allow a lab to forgo proficiency testing under certain circumstances.	Reject. The definition of proficiency testing was taken from ISO/IEC 17043:2010. There is a requirement for laboratories to participate in externally provided proficiency tests from providers accredited to ISO/IEC 17043 when available. In the event such tests are not available, laboratories shall participate in intra-/interlaboratory comparisons to assess the reliability of results rather than do nothing.
2	4.3(a)	T	Allowing testing only of most common matrix doesn't ensure that tested personnel can validly apply method to all casework.	We realize the group rejected the suggestion to make sure proficiency testing covers the full gamut of casework on feasibility grounds, but the fact that valid proficiency testing is currently difficult or unavailable doesn't mean the standard should allow for someone to be deemed proficient in casework based on the testing if it doesn't cover the full gamut.	Reject: For a minimum standard, the language is appropriate as written. A laboratory can choose to exceed the minimum standard. The commenter is reminded that proficiency testing alone is not the only way to assess the competency of the laboratory or its personnel. Method validation (ANSI/ASB 036), quality control (ANSI/ASB 054), and training and competency assessment (ASB 173) also play a key role. Proficiency testing is only one component of a quality management system.
4	4.5 d	E	incorrect reference to the published standards	add "ANSI" to "see ASB Standards 119, 120, 121"	Accept.
6	4.10	T	As a state laboratory we are required to follow the state's (Texas) retention schedule. We cannot retain records longer than outlined in the schedule, nor can we make an exception for one discipline. Seven years is longer than the retention period for this type of record in Texas.	Please add back in "unless otherwise dictated by local statute."	Reject. Scientific standards from SDOs are derived independent of state law. The seven year retention period is deemed appropriate as it is a reasonable time for most cases to be adjudicated.