

	A	D	E	F	G	H	I
1					Public Comment Deadline: March 28, 2022		
2					ASB Std 155, Standard for Minimum Training Requirements for Forensic Document Examiners		
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4							
5							
6	#	Section		Type of Comment (E-Editorial, T)	Comments	Proposed Resolution	Final Resolution
7	46	this form		editorial	In the header titled "Type of Comment" the word in the second line is "Technical)". The close parenthesis should not be there	Remove the close parenthesis	This is for ASB to address. It seems the commenter should have expanded cell #6E to see the entire info.
8	41		4.3.B		Many of the topics listed best lend themselves to trainers from outside of the FSSP and the use of outside expert resources should be encouraged. For example, "research methodology" is typically part of a PhD program in hard or social sciences and rarely part of the ordinary work of a FSSP or FSP. Likewise "Human Factors" is a specialized area of research and knowledge that few FSSPs have on staff.	"Is proficient in most topics of instruction in this program and has the capacity to identify internal and external "qualified sources" with the specialized knowledge to train on topics outside their expertise."	Reject with modification: Section 4.3-b was modified to read: "Is proficient in most topics of instruction in this program, and has engaged an associate trainer(s) with the remaining required specialized knowledge." Engaging such an associate implies that they have identified one who is a qualified source.
9	100	COMMENT		E	Add a note that this standard is not retroactive, as was noted in the by the consensus body of the ASTM when E2388 training standard was passed, the first consensus standard on training for both the public and private sector.	Add a NOTE stating this standard is not retroactive or that the requirements as stated are from the publication date forward.	Accept with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.
10	64	Forward		T	Paragraph 5 says the draft of this document was developed by the FDE Subcommittee of the OSAC for Forensic Science but this is misleading because the draft that was developed at OSAC is what was revised, prepared and finalized as a standard by the FDE Consensus Body.	Change paragraph 5 so that it reads as follows: "An earlier draft of this standard developed by the Forensic Document Examination Subcommittee of the Organization of Scientific Area Committees (OSAC) for Forensic Science was revised, prepared and finalized as this document by the Forensic Document Examination Consensus Body of the AAFS Standards Board."	Reject: This is a standard sentence that ASB uses on all its documents per the ASB Style Manual.
11	72	3		T	There is no definition of Mentorship (or Mentor), which in private practice is a standard method of training.	Add a definition such as the following: Mentor: An FDE who works regularly with a trainee providing lectures, guidance, reading assignments, and hands-on projects as part of a structured program of instruction. The mentor must have considerable one-to-one contact and direct interaction with the trainee.	Reject: The term "mentor" is not utilized in this standard and therefore would be inappropriate to define.

	A	D	E	F	G	H	I
12	83	3		T	<p>Include other terms commonly used within the profession to describe training. There is no published research supporting that only a full-time apprenticeship working almost daily with the trainer at the trainer's place of work (as stated in this standard) produces a more competent FDE than one who trained in a Mentorship or Tutelage program of the same number of hours on a part-time basis. For this reason, other recognized terms should be included. It is important this standard reference all of the training methods and terms used within the profession, both within the public sector and private sector. The terms mentorship and tutelage have been commonly used within the profession for many years, as confirmed in the NIST publication of "Forensic Handwriting Examination and Human Factors: Improving the practice through a Systems Approach" (May 2021), which reads "Based on the U.S. training manuals reviewed by the Working Group....Historically, trainees were (1) trained under the tutelage of FDEs either in private practice or in government laboratories in an apprenticeship or mentorship capacity..." Note the term "Historically". If these terms are not acknowledged, then this standard will be prejudicial to those professionals who trained in a mentorship or tutelage program, those who currently are or will in the future.</p>	<p>Add the terms Mentorship and Tutelage to Section 3. Definition: "Mentorship: A training program under the auspices of an FDE whose favorable reputation is established in the profession. The mentor instructs the trainee in the knowledge, skills, and abilities necessary to become a forensic document examiner. The training may be on a full time or part time basis, consisting of 4,000 hours, not to exceed four years. One-on-one case work study is an essential element of the training." The definition of "Tutelage" would be the same as for Mentorship.</p>	<p>Reject: The terms "Mentorship" and "Tutelage" are not utilized in this standard and therefore would be inappropriate to define.</p>
13	2	3.1		technical	<p>change "full time student"- already established training may be interrupted or take longer than 2 years</p>	<p>change "full time student" to just "student"</p>	<p>Accept</p>
14	26	3.1		E	<p>First sentence defines "apprentice" more than "apprenticeship"</p>	<p>Update language to define "apprenticeship": Study by a full time student under the auspices of a FDE whose favorable reputation was established in the profession.</p>	<p>Accept with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."</p>
15	27	3.1		E	<p>The last sentence is the only time "teacher" is used in the document; use "instructor" for continuity and correct sentence tense (determined)</p>	<p>The instructor determines when the individual was sufficiently trained to begin working on his/her own and may or may not have followed that individual's case work for a period of time.</p>	<p>Reject with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."</p>
16	47	3.1		technical	<p>This definition is for an apprentice, not the apprenticeship. Also, check that the definition in the ASB Tech Report 071 is consistent with this definition.</p>	<p>Apprenticeship is the arrangement in which a person receives training in a specific discipline under the tutelage of a trained and qualified expert in the same discipline.</p>	<p>Reject with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."</p>

	A	D	E	F	G	H	I
17	65	3.1		T	Limiting the definition of apprenticeship to full-time eliminates the part-time equivalent option that has been in every consensus minimum training standard approved and published by ASTM and SWGDOC. ASTM E2388-05 and SWGDOC Training Standard ver. 2013-1 specifically stated that "the training program shall be the equivalent of a minimum of 24 months full-time training under the supervision of a principal trainer" and that "the training program shall be successfully completed in a period not to exceed four years." Any attempt to now eliminate the equivalent 4-year part-time training option typically encountered in training FDEs in the private sector is arbitrary and would effectively establish an illegal barrier to entry into the FDE profession through the 4-year part-time training program that is equivalent to the 2-year full-time training program and that has been deemed acceptable and included in every previous consensus standard addressing minimum training requirements for FDEs. There is NO empirical data to support the proposition that a 2-year full-time training program is more effective than a 4-year part-time training program involving the same curriculum. There is, however, evidence that the group of FDEs seeking to eliminate the part-time 4 year training option are doing so in order to eliminate competition from private-sector FDEs with the hope "that fewer courts will admit the testimony of FDEs without 24-month resident training," the hope expressed by Joseph Parker at the end of his article referenced as item 5 in the Bibliography to this standard.	Delete "full-time" or add "or part-time" after "full-time"	Accept
18	73	3.1		E	" <u>Apprenticeship</u> " is NOT a student as stated in the definition. An "apprentice" is a student. The current definition mixes parts of speech and is incorrect grammatically.	Either change the word being defined to "Apprentice" or change the definition to match properly with the word being defined.	Accept with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."
19	74	3.1		E	The definition has some sentences that are in the past tense and some that are in the present tense. So it is impossible to tell whether this is a current definition or a recitation of how things were in the past.	Rewrite the definition so that the reader can tell whether is a current definition or something historical.	Accept

	A	D	E	F	G	H	I
20	84	3.1		T	<p>The definition of apprenticeship is defined as a "full time student...working almost daily." An apprenticeship can also be on a part time basis and unless this standard acknowledges this fact then the definition of apprenticeship should be defined as the one commonly used and commonly understood by the average person, which is stated by the Dept of Labor on its website, which is "Apprenticeships combine paid on-the-job training with classroom instruction to prepare workers for highly-skilled careers". The DOL further states that "Apprenticeship is an industry-driven, high-quality career pathway where employers can develop and prepare their future workforce, and individuals can obtain paid work experience, classroom instruction, and a portable, nationally-recognized credential." The NY Dept. of Labor (and other states) also define apprenticeship as "paid on-the-job training". The NJ Report on Education and Training in Forensic Sciences (2004) defines apprenticeship as "a relationship where an individual works for an entity while learning skills." There are many more recognized sources that define apprenticeship as a paid position. Unless part-time apprenticeship training is acknowledged in this standard, the standard will have a prejudicial effect on FDEs in the private sector who trained part-time.</p>	<p>Re-write the definition to read: " A student training under the auspices of an FDE whose favorable reputation was established in the profession." Delete the following sentence referencing paid or unpaid. Leave the last sentence as written. Otherwise, use the Dept of Labor's definition of apprenticeship: "On-the-job training under the auspices of an FDE whose favorable reputation was established in the profession." Delete the second sentence referencing paid or unpaid. Leave the last sentence.</p>	<p>Reject with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."</p>
21	85	3.1		T	<p>If adding the definitions of Mentorship and Tutelage (as recommended in my other comment on section 3.1) are rejected by the WG, then rewrite the definition of Apprenticeship to be consistent with the definition provided in the referenced Footnote 1 in Section 4.4 which is the National Institute for Justice (NIJ): Guide for Forensic Science Laboratories, Educational Institutions, and Students and other government documents" which states that an "apprenticeship is a relationship where an individual works for an entity while learning skills." And add a NOTE below the definition of apprenticeship as in my recommendation column.</p>	<p>If Mentorship and Tutelage are not defined in this standard then rewrite the definition of "Apprenticeship" as referenced in my comments, to read: "Apprenticeship is a relationship where an individuals works for an entity while learning skills." And, add a NOTE under "apprenticeship" which reads: "Mentorship and Tutelage are additional terms used to describe training and may be on a full-time or part-time basis, consisting of 4,000 hours, within a period not to exceed four years</p>	<p>Reject with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."</p>
22	101	3.1		T	<p>The terms " Mentorship" and "Tutelage" should also be included in this section defining the term "Apprenticeship". Webster's Dictionary includes the synonym "training" for the definition of term Mentorship. Webster's Dictionary also includes the term "training" as a synonym for the "term " Tutelage"</p>	<p>Include the terms "Mentorship" and "Tutelage" in the definiton of Apprenticeship training.</p>	<p>Reject: The terms "mentorship" and "tutelage" are not used in this document. Per ASB's Style Manual terms not used in the document are not included in section 3.</p>
23	102	3.1 & 3.9		T	<p>There is no reason that a trainee must be at the workplace when assigned reading assignments in the section entitled "Distance Learning". The trainee can call their trainer by phone if they have a question or take notes as they read the assignments and contact their trainer for clarification.</p>	<p>Add the wording that a trainee does not have to be at the workplace when assigned reading assignments and other ancillary work assignments.</p>	<p>Reject with modification: Section 3.1 was revised and updated for clarity. "Apprenticeship: An arrangement in which a student (apprentice) is learning knowledge, skills, and abilities through practical experience under the auspices of a principal trainer."</p>
24	18	3.2	Now 3.3	E	<p>"Successfully" feels awkward here. Can reword.</p>	<p>Change definiton to "The successful demonstration of ... perform forensic analysis."</p>	<p>Accept with modification: The definition of competency was updated to read "The ability to understand and demonstrate the qualitative and quantitative technical skills and knowledge required to perform forensic analysis"</p>

	A	D	E	F	G	H	I
25	38	3.2	Now 3.3	E	"Competency" is defined as "The demonstration of technical skills and knowledge necessary to perform forensic analysis successfully." Certainly, competency can be demonstrated, but the demonstration is not the competency. The demonstration is a competency test, which OSAC defines as "Evaluation of a person's knowledge and ability to perform work before authorization to do so independently."	Define "competence" as "possession of the skills and knowledge necessary to perform forensic analysis, interpretation, and related tasks successfully."	Reject with modification: Competence is not only the possession of the skills and knowledge, but also the demonstration of those skills and knowledge, as alluded to in the comment. The definition of competency was updated to read "The ability to understand and demonstrate the qualitative and quantitative technical skills and knowledge required to perform forensic analysis"
26	48	3.2	Now 3.3	technical	The competency definition is not sufficient.	Competency is the ability to understand and demonstrate the knowledge and technical skills necessary to perform the minimum abilities to perform a forensic analysis.	Accept with modification: The definition of competency was updated to read "The ability to understand and demonstrate the qualitative and quantitative technical skills and knowledge required to perform forensic analysis"
27	8	3.4	3.6	T	what does "psychomotor behaviors" mean?	Provide one or two examples so the reader has an idea what is meant.	Accept with modification: The definition of KSA was updated to read: "The level of information, qualifications, and experience needed to perform assigned tasks. NOTE: Knowledge refers to acquired understanding of the principles and practices related to a particular job (e.g. principles of forensic document examination); skills refer to acquired analytical and psychomotor behaviors (e.g. operation of scientific or technical equipment); and abilities are talents, observable behaviors, or acquired dexterity (e.g. capacity for conducting forensic document examinations).[1]"
28	49	3.4	3.6	technical	The level of information, qualifications, and experience needed to perform assigned tasks." This sentence is not necessary to the definition.	Remove the first sentence.	Reject: The sentence provides an introduction to the concept of KSAs, each of which is further explained in the following sentence.
29	3	3.5	3.7	E	manufactures --> manufacturers	insert necessary r	Accept
30	29	3.6	3.8	E	Clarify if intent is for principal trainer to deliver technical training and/or administratively coordinate training program.	"Training Coordinator" may provide administrative oversight to the training program involving principal and associate trainers for subject matter expertise training. [3.2] "Training Coordinator (TC): administers training program and/or provides technical training in conjunction with Principal Trainer and Associate Trainers; manages training schedule and documents training program, as applicable."	Reject: While some laboratories may have overall Training Coordinators, that is subject to individual laboratory policy and beyond the scope of this standard which applies specifically to training programs in Forensic Document Examination, for which a principal trainer is the person with primary responsibility for the training program.
31	50	3.7	3.9	technical	Qualified sources is not adequately described.	I propose the following definition of "qualified sources". "An organization, person or literature that has the ability to provide reliable information or instruction in the field of forensic document examination."	Reject with modification: The title was updated to read "qualified sources (of training)" to provide clarification that this definition is for parties that provide specific creditable training. The definition was updated to read "Credible organizations or individuals that provide, sponsor, or otherwise arrange for reliable training or instruction on specific forensic document examination or related topics."
32	51	3.9	3.11	technical	The last sentence "There may or may not be a financial arrangement between the trainer and trainee." is not necessary to the definition.	Remove the last sentence in this definition.	Accept

	A	D	E	F	G	H	I
33	75	3.9	3.11	T	By defining "trainee" as "A student under in-person, direct supervision of a principal trainer on an almost daily basis" the ability of an individual in the private sector to obtain proper training is almost expunged. This definition is completely in tune with the workings of a public laboratory, and leaves little opportunity for the existence of a "trainee" in private practice.	Change the definition of "Trainee" to the following or some other alternative: " A student participating in a structured program of instruction as outlined in this standard, and under the direct supervision of a principal trainer."	Reject with modification: The definition of trainee as written does not preclude training in private practice. There is nothing in the proposed change that would allow for training to occur in a private setting moreso than the current definition. The second sentence of the definition was removed to clarify that whether or not there is a financial arrangement or employment agreement do not impact whether or not someone qualifies as a trainee.
34	86	3.9	3.11	T	Trainee: Competent FDE's have been trained full-time and part-time over the many years of the profession. Full-time training mainly occurs in the public sector when a trainee is an employee-employer relationship. A very few FDE's are trained in the family business. The vast majority of privately trained examiners trained part-time, while working another job to support themselves and the cost of training. There is no peer reviewed published research supporting that on method produces a more competent examiner. As per the consensus of the profession since 2005 (ASTM E2388) part-time training can occur over a four year period, as agreed and published in the SWGDOC training standard (2013) and listed as Normative Reference in published ASB standard. Therefore, it is inaccurate to state that a trainee (referring to all trainees) trains almost daily with the trainer. Also, there is no need to discuss financial arrangements between a trainer and trainee in this document, but, if discussed, it should include that public sector trainees are in an employee-employer salaried relationship, for full and fair disclosure.	Revise the first sentence to read. "A student under in-person, direct supervision of a principal trainer." Delete the next sentence. If the revision is rejected, then add the following at the end of the last sentence. Add a period after "trainee" then write "Public sector trainees are employees of the agency at which they are being trained" Or something similar for full and fair disclosure	Reject with modification: The second sentence of the definition was removed to clarify that whether or not there is a financial arrangement or employment agreement do not impact whether or not someone qualifies as a trainee.
35	19	4.1		E	"skill" needs to be plural	Change "skill" to "skills"	Accept
36	28	4.1		E	Parenthetical reference is missing from second sentence. (see Error! Reference source not found.)	include referece or remove parenthetical entry	Accept: Reference #1 added to the Bibliography.
37	71	4.1		T	I see that in the Handwritten Items Guide (ASB #70) the term "generally accepted" has been changed to "generally used." I think this is a better description of reality and I would like that change made in this guide (and all others) as well.	Change "generally accepted" to "generally used" in Section 4.1	Accept
38	76	4.1		E	Delete the parenthetic non-sequitor in the middle of the paragraph.		Accept
39	9	4.2		T	Add a comment because those who trained earlier than 2005 may not have a bachelor's degree and what would be considered "comparable?" This is important as the NIST report pointed out that there are many highly qualified forensic document examiners that do not have a college degree.	"This standard applies to all those trained after 2005 and is not retroactive," or "This standard states the criteria from the date of publication forward." Define "comparable."	Reject with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.

	A	D	E	F	G	H	I
40	87	4.2(a)		T	<p>This section requires a bachelor's degree and this is fine, however such a requirement across the profession was first introduced in 2005, ASTM E2388. Prior to 2005 such a requirement was laboratory or principal trainer dependent. There are competent FDEs who trained many years ago (1980s, 1990's, pre-2005) who do not have a degree. In the NIST publication of "Forensic Handwriting Examination and Human Factors: Improving the practice through a Systems Approach" (May 2021), this was acknowledged and it states "...many highly qualified FDEs do not have a college degree...the Working Group recognizes that college or university degrees are not the only method of obtaining the required level of knowledge in the core curriculum." In order to be fair and not discriminatory against competent FDE's who trained when there was no degree requirement within the profession, a Note should be added advising the reader the same. Further support that a degree was not considered necessary in earlier years is the waiving of a degree (even training requirements) for several years for applicants to the ABFDE, as stated in a brochure they published after incorporating.</p>	<p>Following 4.2 (a) add a NOTE that reads: "The college degree requirement was laboratory/trainer dependent prior to being a requirement in the first consensus standard for training in published 2005. There are many highly qualified forensic document examiners that do not have a college degree." Add a footnote in support of the added Note, referencing the NIST publication of "Forensic Handwriting Examination and Human Factors: Improving the practice through a Systems Approach" (May 2021), which states there are many highly qualified forensic document examiners that do not have a college degree."</p>	<p>Accept with modification: A revised Note was added to section 4.2.-a and reference #4 was added to the Bibliography. This section is appropriate as written.</p>
41	52	4.2.a		technical	<p>Add "a minimum" before bachelor's degree.</p>	<p>"Possess a minimum of a bachelor's degree..."</p>	<p>Accept with modification. Sentence revised based on comment #55 to read: Possess and document a minimum of a bachelor's or foreign equivalent degree..."</p>
42	53	4.2.a		technical	<p>Remove the word "regionally". It is not needed in this requirement.</p>	<p>Replace with "...degree from an accredited educational institution..."</p>	<p>Reject: The Federal Government only recognizes "regional accreditation agencies" as valid accreditors in academic disciplines. This standard follows US Federal guidance on what is and is not an acceptable academic institution.</p>
43	54	4.2.a		technical	<p>Remove "a background in a laboratory based science is preferable." A preference is not a requirement and this is listed under 4. Requirements.</p>	<p>Remove parenthesis.</p>	<p>Accept with modification: This section was modified to clarify the intended meaning. It now reads: "...equivalent that included 24 semester hours in STEM (Science, Technology, Engineering, Math) coursework."</p>
44	55	4.2.a		technical	<p>Add "and document" after the word "Possess".</p>	<p>It should read "Possess and document a minimum of a bachelor's degree..."</p>	<p>Accept</p>
45	10	4.2 b)		T	<p>Define whether this testing is based on a standardized test, an optometrist or ophthalmologist test, or one the trainer makes up.</p>	<p>I don't have a resolution as I do not know what the source of this test should be.</p>	<p>Reject: The requested change is beyond the scope of this standard and is subject to individual laboratory policy.</p>
46	56	4.2.b and 4.2.c		technical	<p>"Demonstrate" does not adequately insist that the proper ophthalmologic test be performed.</p>	<p>Successfully complete and document appropriate vision tests for form blindness and color blindness.</p>	<p>Reject: The requested change is beyond the scope of this standard and is subject to individual laboratory policy.</p>
47	4	4.2e		T	<p>"as required by laboratory employment protocols." seems unnecessary. IF it is required by a lab or any kind of employer, it should be that lab or employer's prerogative to list it in their protocols. A potential trainee should pass a background check prior to training, regardless of whether its required by their lab or employer's protocols</p>	<p>remove "as required by laboratory employment protocols."</p>	<p>Accept</p>

	A	D	E	F	G	H	I
48	31	4.3		E	"qualifications of any associate trainers or subject matter experts shall be approved by the principal trainer." In accredited laboratories, the Lab's Quality Assurance Program should define/document qualification for authorization.	"qualifications of any associate trainers or subject matter experts shall be authorized in accordance with laboratory quality management protocols.	Reject: Not all laboratories have defined quality management protocols; however, the qualifications of any associate trainers or subject matter experts shall still be approved irrespective of whether or not a laboratory has a defined quality management protocols.
49	34	4.3		E	Limiting trainers to only FDEs limits opportunity for exposure to additional scientific techniques and growth as a discipline.	Could define as Scientist, SME, Forensic Scientist, or authorized personnel as defined by the laboratory's quality system.	Reject: Only the principal trainer is required to be an FDE. This does not exclude other scientists from being involved in the training as associate trainers or subject matter experts.
50	36	4.3		E	In the opening line a reference is made to an NIJ publication for requirement of a Trainer. The publication makes no mention of the tenants of section 4.3, including that a trainer must be discipline specific (must be an FDE), 5 years of experience, or the term Principal Trainer.	Remove the reference since it does not support the requirements. Also, expand the term "principal trainer" to include associate trainers and other qualified subject matter experts.	Reject with modification: The reference is to ASB Standard 011: Scope of Expertise in Forensic Document Examination, and not the referenced NIJ Document. The footnote and bibliography references were modified to clarify their intended uses. The suggested expansion of the term principal trainer is also rejected as associate trainers and other subject matter experts are brought in to assist the principal trainer on a subject by subject basis, and therefore do not need to be fully qualified FDEs.
51	39	4.3		E	The freestanding sentence "All of the above requirements shall be documented" is unclear. Is it asking that someone place the list of the requirements into some document?	Replace the sentence with "The FSSP shall document the fact that it has complied with all of the above requirements.	Accept with modification: The statement was modified to clarify the intended meaning; however, specific requirements on who documents the compliance is subject to individual laboratory policy.
52	90	4.3		T	The last sentence of 4.3 states that all requirements shall be documented. It is reasonable to request documentation for those currently in training, however, examiners who trained in the 1980s, 1990s, and prior to the 2005 ASTM E2388 consensus standard, documentation may not be available because there was no requirement to document every aspect of one's training. Also, FDEs who were principal trainers in the 80s and 90s may be deceased so there is no access to their records. And, public agencies may not have achieved training records from 30 years ago so the FDE would not have access to his/her records. In fairness to these FDEs who trained many years ago, add a Note providing a reasonable exception. This recommendation follows FSAB procedures.	Add Note at the end of this section, to read: "For training that occurred many years ago for which such records are not available, there should be a list of the training that did occur and which is considered equivalent, even if it did not occur over a contiguous time period."	Reject with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.
53	24	4.3 (Section a)		T	The word "graphology" needs to be modified to more specifically "character graphology," in order to align with the rest of the sentence stating "similar personality assessment fields." Adding the modifier is important because "graphology" as a field of study, despite the commonly accepted definition, also includes related areas of handwriting study beyond simply character graphology. Some other areas of study within graphology ARE in fact very useful and applicable as training or experience in forensic handwriting examinations. (An example being the field of Experimental Graphology, which includes the study of how medication affects handwriting)	Insert the modifying adjective of "character" before the word "graphology"	Reject: Graphology as it is defined by Merriam-Webster is "the study of handwriting especially for the purpose of character analysis", or in the Cambridge Dictionary is "the study of the way people write letters and words, especially in order to discover things about their characters". In accordance with these definitions, it is not necessary to apply a qualifying word to graphology in the context of this note.

	A	D	E	F	G	H	I
54	11	4.3 a)		T	Add a comment because those who trained earlier than 2005 may not have had a structured program because they were in an apprenticeship program	For trainers whose fundamental training was before the equipment and other technology or subjects referenced in the standard was available, the trainer's KSA's must be updated and documented through continuing education.	Accept with modification: The following statement was added "For trainers whose fundamental training was before the equipment and other technology or subjects referenced in the standard was available, the trainer's KSAs must be up-to-date and documented through continuing education."
55	88	4.3(a)		T	We all know that when some FDEs initially trained they could not have been trained pursuant to all of the topics of instruction in this standard. FDEs who trained prior to the market production of the fax machine, computer, VSC, ESDA, and other would have had to update their knowledge through continuing education and training. For this reason, the core training received could NOT have been "a structured training program comparable in duration and subject matter as required in this standard." A NOTE should be added for clarification and to be fair to those qualified examiners who trained many years ago when there was no standardization in training, as per the many articles that state this fact. If the WG is not familiar with these articles I can supply them.	Add NOTE: "A Principal Trainer who trained many years ago before some of the equipment and/or techniques referenced in this standard were used or invented must have updated his/her knowledge on the techniques and equipment through continuing education and training.	Accept with modification: The following statement was added "For trainers whose fundamental training was before the equipment and other technology or subjects referenced in the standard was available, the trainer's KSAs must be up-to-date and documented through continuing education."
56	57	4.3.a		editorial	To keep the language consistent, add the word "Has" to the beginning.	"Has acquired the knowledge, skills and abilities..."	Accept
57	77	4.3.a		T	The requirement, "Acquired the KSAs to practice document examination based upon a <u>structured training program comparable in duration and subject matter as required in this standard</u> " as written would eliminate some of the most experienced (initially trained farthest back in time) FDEs since the program described did not exist at the time of their training. I doubt this is the intention of the committee.	Add a note to explain that for topics that were introduced after the time of the principal trainer's initial training, continuing education is required to supplement the KSAs of the trainer.	Accept with modification: The following statement was added "For trainers whose fundamental training was before the equipment and other technology or subjects referenced in the standard was available, the trainer's KSAs must be up-to-date and documented through continuing education."
58	58	4.3.a Note		editorial	The Note should addressed in 4.6.1	Remove the Notes from this section and move to 4.6.1.a	Reject: The Note in 4.3.a is appropriate where it is located as it explains that the trainer's experience as a FDE must be relevant to the material for which they will be training.
59	12	4.3 b)		T	This statement is too limiting. Certain types of training require an expert or a specialist in that area, not an associate trainer.	"...has engaged an associate trainer or a specialist with the required...."	Reject with modification: Associate trainer was defined to clarify the intended meaning. The document now reads "3.2 associate trainer An individual who assists the principal trainer undertaking designated training activities. This person may be another Forensic Document Examiner or may be a subject matter expert providing specialized knowledge to the student."
60	40	4.3 (b)		T	The requirements for the trainer are unrealistic or suggest a level of proficiency which is too low. The requirements include "is proficient in all topics of instruction in this program, or has engaged an associate trainer(s) with the required specialized knowledge."	Replace this sentence with something along these lines.	Accept with modification: The statement was modified to clarify the intended meaning that The principal trainer must be proficient in most topics and engage an associate trainer for any remaining topics in which the principal trainer is not proficient. It now reads: "b)Is proficient in most topics of instruction in this program, and has engaged an associate trainer(s) with the remaining required specialized knowledge."

	A	D	E	F	G	H	I
61	89	4.3(b)		T	Section (b) is in conflict with section (a). Section (a) states the principal trainer must have acquired KSAs in all subject matter listed in this standard. Section (b), however, implies that if the trainer is not proficient in all the topics of instruction he/she can engage an associate trainer with the required knowledge to teach the trainee the specific subject matter. The use of the word "or" implies an alternative between two choices, being proficient in all topics or engaging an associate in topics of non-proficiency. Some laboratories do not offer every single exam procedure listed in the standard so it would be appropriate to send some types of cases to another person who is specifically trained for such examination. All examiners, however, should have an understanding of the examination techniques in order to properly process the evidence to the other specialist. This should be more clearly written.	Send back to the WG to resolve the conflict.	Accept with modification: The statement was modified to clarify the intended meaning that The principal trainer must be proficient in most topics and engage an associate trainer for any remaining topics in which the principal trainer is not proficient. It now reads: "b)Is proficient in most topics of instruction in this program, and has engaged an associate trainer(s) with the remaining required specialized knowledge."
62	30	4.3.b		E	"associate trainer(s)" introduced for the first time; define in section 3	[3.2] Associate Trainer: assists Training Coordinator by undertaking designated training activities.	Accept with modification: Associate Trainer was defined as follows: "3.2 associate trainer An individual who assists the principal trainer undertaking designated training activities. This person may be another Forensic Document Examiner or may be a subject matter expert providing specialized knowledge to the student."
63	35	4.3, c		E	Time as a standalone metric is insufficient. All ANAB forensic accreditation programs are based on ILAC G19 (https://anab.ansi.org/en/forensic-accreditation). ILAC G19, Section 3.3 states "Having qualifications, training and experience neither guarantees practical competence nor sound judgement. Therefore, management or responsible persons shall be able to demonstrate with objective evidence that all personnel are competent, by carrying out assessments of their knowledge and skills against defined criteria." It is not to discount experience as positive attribute, but simply being in the field of Document Examination for five years does not demonstrate competency.	Can reword to "Authorization under a quality system which monitors performance through assessments, competency testing, technical reviews, and external monitoring." Or "Five years of experice working in an accredited laboratory, processing cases, is recommended."	Reject: Not all laboratories have a defined quality system, nor are all laboratories accredited. Five years of experience is a necessary but not sufficient condition and subsection a) requires that the principal trainer has the necessary KSAs, and subsection b) requires proficiency among the principal trainer, or engage an associate trainer with any remaining specialized knowledge. The combination of the requirements set forth in Section 4.3 ensure that the Trainer is properly qualified to conduct the training.
64	59	4.3.e		technical	Remove the word "NOTE" because the NOTE in this section defines the casework that is is required.	Remove the word "NOTE".	Reject: This is appropriate as a note to clarify 4.3.e.

	A	D	E	F	G	H	I
65	78	4.3.e		T	Casework from past cases is certainly useful, but this section and the Note that is included in it makes no reference to "ground truth" case examples which are the most important type of material for training. You can not train people in a scientific field by requiring them to reach the same opinion that was reached by another examiner at another time. That is not scientific. Casework is good to use when you are at a higher level where debate is encouraged, but for beginning learners, the example must be ground truth examples. Section 4.6.1.b of this document acknowledges the importance of ground truth materials and such materials should be referenced in this section too.	Change section 4.3.e to read: "Has access to diverse casework and ground truth examples and mock cases for review and discussion."	Accept
66	79	4.3.f		T	The Note under "f" is too important to be a Note and should be a stand alone provision.	Make the Note under 4.3.f into a separate provision numbered 4.3.g	Accept with modification: section added: g) Be able to develop and administer practical examinations for training purposes, when necessary.
67	1	4.5		technical	change "full time training " to just "training" - already established it can be interrupted or take longer than the full time 2 years.	change to "training"	Accept
68	5	4.5		E	An "a" is needed before "...trainee's training" in first line of fourth paragraph	add an "a" before "...trainee's training" in first line of fourth paragraph	Accept
69	13	4.5		T	4000 hours is acceptable. However, the period of two years should be change to four years to accommodate the differences for private examiners and laboratories who cannot train continuously for two years.	The last sentence in paragraph one should read, "... A trainee can achieve competency in all modules of forensic examination in 4000 hours of full time training over a two to four year period of time."	Reject with modification: Section 4.5 does not require that the training be completed in two years; rather, it explains that the 4,000 hours is approximately 2 years of training time, if full time. The Section further explicitly allows for longer periods of training if approved by the principal trainer. The paragraph was partially reworded to "It is estimated that a trainee can achieve competency in all modules of forensic document examination in 4,000 hours of training." A subsequent note was also added to clarify the intended meaning. The note reads "NOTE 2 4,000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training" program described by ASTM E2388:2005, Standard Guide for Minimum Training Requirements for Forensic Document Examiners."
70	25	4.5		T	The mention of "full time training" without offering an equivalent of part-time training is too restrictive. The paragraph can be restated as a <i>recommendation</i> which fits the format used in other areas throughout the draft, for example section 4.9 where the use of the terms "recommended" and "highly recommended" are used.	Install the words "It is recommended" at the beginning of the first paragraph. Install the wording "or equivalent part time training" to complete the second sentence.	Reject with Modification: The paragraph was partially reworded to "It is estimated that a trainee can achieve competency in all modules of forensic document examination in 4,000 hours of training." A subsequent note was also added to clarify the indented meaning. The note reads " NOTE 2 4,000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training" program described by ASTM E2388:2005, Standard Guide for Minimum Training Requirements for Forensic Document Examiners." Section 4.5 does not require that the training be completed in two years; rather, it explains that the 4,000 hours is approximately 2 years of training time, if full time. This section explicitly allows for longer periods of training if approved by the principal trainer.

	A	D	E	F	G	H	I
71	66	4.5		T	The first paragraph limits training to 4,00 hours of full-time training described as "workplace supervised learning" - meaning on-the-job training typically encountered in the public sector but rarely in the private sector, where the same 4,000 hours are completed part-time over a 4-year period. The desire to eliminate the part-time training option that has been accepted in FDE consensus training standards for nearly twenty years is motivated by certain FDE trade associations and their members who seek to eliminate competition from the marketplace.	Change the first paragraph to read as follows: "The training program shall be a structured, documented, and systematic 2-year full-time or 4-year part-time apprenticeship program. The training shall be supervised by the principal trainer or an associate trainer. It is estimated that a trainee can achieve competency in all modules of forensic document examination in 4,000 hours of training, completed on a full-time basis over two years or a part-time basis over four years."	Reject with Modification: The paragraph was partially reworded to "It is estimated that a trainee can achieve competency in all modules of forensic document examination in 4,000 hours of training." A subsequent note was also added to clarify the indented meaning. The note reads "NOTE 2 4,000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training" program described by ASTM E2388:2005, Standard Guide for Minimum Training Requirements for Forensic Document Examiners." Section 4.5 does not require that the training be completed in two years; rather, it explains that the 4,000 hours is approximately 2 years of training time, if full time. This section explicitly allows for longer periods of training if approved by the principal trainer.
72	67	4.5		T	The last paragraph of Section 4.5 mentions "workplace supervised instruction," the plain meaning of which is "on-the-job" supervised instruction and which equates to full-time training or in-residence learning at the workplace. The part-time training option that was included in the previously published ASTM and SWGDOC consensus training standards must be included and expressly provided for in this ASB training standard to avoid potential antitrust consequences .	Change the last paragraph of Section 4.5 to read as follows: "The reason for lapses or extensions in training shall be documented by the principal trainer."	Reject: "workplace supervised instruction" in this standard does not mean "on-the-job" or "in office"; rather, it means that the training is always supervised and at the specific direction in some manner by the workplace and/or principal trainer. As demonstrated during the pandemic, some elements of training may be required to be done remotely due to exigent circumstances; however, as long as the training is still supervised by the workplace and the reason for the change is documented, then it would meet this standard. This is not to be taken though as allowed for entirely or majority remote training, as stated in Section 4.6.2.
73	70	4.5		E / Best Practice	As a former member of ASTM Forensic Document Committee since 2003, I am aware of the steps that should be taken to make a revision of this magnitude. The 4,000 hour / 2 year or it's equivalent is important. It is my belief that the term equivalent is important as an integral part of this standard as differing circumstances must be taken into account for the duration of training. This can be due to sick / parental leave or due to greatly divergent sizes / caseload in varying sized labs, it is my belief that some latitude or degree of flexibility should be considered in the creation of the standard. This is not to mean or indicate that the training period should be open-ended. However, a reasonable amount of leeway should be part of the standard, hence the term "equivalent".	Add the term "equivalent" to the standard.	Accept with Modification: "full time" was removed from the section to clarify the intended meaning. A subsequent note was also added to clarify the indented meaning. The note reads " NOTE 2 4,000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training" program described by ASTM E2388:2005, Standard Guide for Minimum Training Requirements for Forensic Document Examiners." Section 4.5 does not require that the training be completed in two years; rather, it explains that the 4,000 hours is approximately 2 years of training time, if full time. This section explicitly allows for longer periods of training if approved by the principal trainer.
74	80	4.5		T	The Note says "an hour is defined as time spent reading, examining, etc....." Actually, an hour is 60 minutes, and I object to this non-specific definition.	Change the Note in Section 4.5 to read" "An hour is defined as 60 minutes spent reading, examining, etc....."	Accept

	A	D	E	F	G	H	I
75	81	4.5		T	<p>In paragraph 3 is the statement: To ensure continuity of training, the completion time shall not exceed the program length by more than 50%." There is no study I am aware of that states that competency of a document examiner is reduced by a longer training period. A longer training period may be required due to circumstances of training in the private sector.</p> <p>Furthermore, there is a requirement for testing of level of competence when training has been interrupted, so any issues of reduced competence are resolved. If this requirement is for the convenience of the trainer, then it should be at the discretion of the trainer to extend the training period.</p> <p>Furthermore, in the private sector there might not be "breaks" in training, but rather a need to extend the training because 40 hours per week are not available for either the trainer or trainee. The training might be continuous on a part time basis and therefore take longer.</p>	<p>Change the second sentence of paragraph 3 of section 4.5 to read: "The length of time to complete the training program may be extended at the discretion of the trainee and principal trainer."</p>	<p>Accept with modification: The first sentence was reworded to add that an extension should be made by the principal trainer in agreement with the trainee. It now reads: "The training program may be interrupted or extended due to exigent circumstances, but it is the responsibility of the principal trainer, with agreement of the trainee, to approve any break or extension in training."</p>
76	91	4.5		T	<p>The first paragraph makes reference to full-time training, which is mainly how training is conducted in an employer-employee relationship in public agencies. In the private sector, other than in a family-run business, the majority of training is done on a part-time basis for the same 4,000 hours. In order not to discriminate against FDE's who trained and/or will train on a part-time basis, a reference to part-time training should be included or the words "full-time" eliminated. This remains consistent with the prior consensus of the profession when publishing the 2005 ASTM standard. There has not been any research since the ASTM consensus in 2005 or the adoption of the same language by the SWGDOC in 2013 to establish that the referenced training is inadequate or is not the custom within the profession. It is common knowledge that part-time training in the private sector is often referred to as a Mentorship or Tutelage. Note recognition of these terms in the NIST publication of "Forensic Handwriting Examination and Human Factors: Improving the practice through a Systems Approach" (May 2021), which reads "Based on the U.S. training manuals reviewed by the Working Group....Historically, trainees were (1) trained under the tutelage of FDEs either in private practice or in government laboratories in an apprenticeship or mentorship capacity..." so referring only to an "apprenticeship of workplace supervised learning" is not giving equal and fair recognition to FDEs who trained in Mentorship or Tutelage training program which is also "supervised learning" just not on a full-time basis at the trainer's workplace. There is also a reference to Footnote 2 after 4,000 hours. This footnote refers the reader to the SWGDOC Scope of Work standard. The SWGDOC standard mentions 4,000 hours of training, but also states "The training program shall be the equivalent of a minimum of 24 months full-time training under the supervision of a principal trainer....completed in a period not to exceed four year." The definition being the consensus of the profession in 2005 and 2013.</p>	<p>In the first paragraph delete the words "apprenticeship program" and "workplace" and relocate the word "program" in the sentence. The new sentence would read: "The training shall be a structured, documented, and systematic supervised learning program". After 4,000 hours it should read "of full time or part-time training". Delete the words that follow in parenthesis or re-write the words to read "extrapolated from prior consensus standards published by the ASTM and SWGDOC" or to read, "extrapolated from the SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners." (ver 2013). Then correct the footnote link.</p>	<p>Reject with Modification: The sentence was reworded to "It is estimated that a trainee can achieve competency in all modules of forensic document examination in 4,000 hours of training." A subsequent note was also added to clarify the indented meaning. The note reads "NOTE 2 4,000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training" program described by ASTM E2388:2005, Standard Guide for Minimum Training Requirements for Forensic Document Examiners."</p>

	A	D	E	F	G	H	I
77	92	4.5		T	<p>The last paragraph states "training must be 100% workplace supervised instruction". Part time training in the private sector is not conducted 100% at the trainer's place of employment. In the private sector a trainee may read books, write reports, and do other assignments in his/her own office or home which is not in the direct presence of the trainer, although the trainer is available should the trainee have a question on an assignment. The words used in a standard must be the common understanding of the word so that the reader is not misled. If the word is being used other than what the average reader would understand the word to mean there must be a NOTE to state that the definition of "workplace" in this standard means xyz... The words "100% workplace supervised instruction", based on the common understanding of the word "workplace" as defined by the Dept. of Labor and other sources, refers to where a person is employed (in this instance it is the trainer's crime laboratory or private office). Since the commonly accepted understanding of "workplace" is one's place of employment, the term must be defined in the definitions section of the standard if a person's place of employment is not what is meant by the term "workplace" or a NOTE added below the section to define the term, if the common understanding is not what is meant in this standard.</p>	<p>If "workplace" is not meant to be the trainer's place of employment, add a NOTE to read as: "The term workplace as used in this standard refers to any location where the trainee is involved in an aspect of his/her training."</p>	<p>Reject: "workplace supervised instruction" in this standard does not mean "on-the-job" or "in office"; rather, it means that the training is always supervised and at the specific direction in some manner by the workplace and/or principal trainer. As demonstrated during the pandemic, some elements of training may be required to be done remotely due to exigent circumstances; however, as long as the training is still supervised by the workplace and the reason for the change is documented, then it would meet this standard. This is not to be taken though as allowed for entirely or majority remote training, as stated in Section 4.6.2.</p>
78	60	4.6.1.b		technical	<p>Either define "ground truth" or erase that term because the remainder of that section details it well.</p>	<p>Remove the term "ground truth".</p>	<p>Reject with modification: The term "Ground truth" has now been defined in section 3 as follows: "Ground truth - Information that is known to be real or true, provided by direct observation and measurement (i.e. empirical evidence) as opposed to information provided by inference."</p>
79	20	4.6.1 c		E	<p>Missing "of"</p>	<p>Change "including the determination of the strength of findings the evidence" to "including the determination of the strength of findings of the evidence"</p>	<p>Reject with modification: The section was reworded to clarify the intended meaning and now reads: "(including the determination of the strength of the findings regarding the evidence), "</p>
80	6	4.6.1c		E	<p>The second to last line of this paragraph needs to be reordered and split up for clarification.</p>	<p>"Each of these exercises shall be reviewed by the trainer upon completion by the trainee. The trainer will assess, among other aspects of the work, the clarity and accuracy of the notetaking, the adherence to the standard operating procedures and processes, the assessment process undertaken (including the determination of the strength of the findings regarding the evidence) and the content of the "forensic report"</p>	<p>Accept</p>
81	7	4.6.1c		E	<p>The word "regarding" added in the parentheses before "evidence".</p>	<p>see above. (including the determination of the strength of the findings regarding the evidence)</p>	<p>Accept</p>

	A	D	E	F	G	H	I
82	14	4.6.2		T	Add the word "mentorship."	"...in addition to direct apprenticeship training or mentorship under a principal trainer..."	Reject: The term "mentorship" is not used in this document. Furthermore, a mentor is one who provides complementary guidance and advice, not discipline-specific core training, to an examiner with limited experience in order to advance their professional development. Accordingly, adding "mentorship" would not be equivalent to apprenticeship training as utilized in this section.
83	61	4.6.2		technical	Add "accredited" before "academic institutions" to keep it consistent with previous requirements.	... qualified sources such as accredited academic institutions."	Accept with modification: The section was reworded to clarify the intended meaning and now reads: "and taking relevant courses offered by qualified sources such as a regionally accredited educational institution or equivalent institution"
84	82	4.6.2			In paragraph 1 "Apprenticeship model" is mentioned, but "mentorship" is not.	Change "Apprenticeship model" to "Apprenticeship/mentorship model"	Reject: The term "mentorship" is not used in this document. Furthermore, a mentor is one who provides complementary guidance and advice, not discipline-specific core training, to an examiner with limited experience in order to advance their professional development. Accordingly, adding "mentorship" would not be equivalent to apprenticeship training as utilized in this section.
85	93	4.6.2		T	Apprenticeship is the only type of training referenced. This is unfair and biased against FDEs who trained or will train on a part time basis in a Mentorship or Tutelage training program.	In the 4th paragraph, first sentence, after the word "Apprenticeship" add the words "Mentorship or Tutelage".	Reject: The terms "mentorship" and "tutelage" are not used in this document. Furthermore, a mentor is one who provides complementary guidance and advice, not discipline-specific core training, to an examiner with limited experience in order to advance their professional development. Accordingly, adding "mentorship" or "tutelage" would not be equivalent to apprenticeship training as utilized in this section.
86	94	4.6.2		T	The last two sentences in this section discussed a "shall" requirement to retained documented training records. In the 80s, 90s, and pre-2005 (ASTM E2388) there was no requirement to document training and maintain detailed records. In fairness to FDEs who trained when there was no requirements, add a note for clarification to the reader of the standard.	Add a NOTE at the end of Section 4.6.2 to read: "It is recognized that training which occurred many years ago may not have been documented in the manner currently being required."	Reject with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.
87	42	4.6.3		T	A sound training program should require that the criteria for "passing" be established at the outset. Further the standard should establish a minimum requirement for "passing" or criteria by which an FSSP should establish passing criteria.	Require that "passing" criteria be established in advance and develop guidance for FSSPs on establishing such criteria.	Reject with modification: Defining specific criteria for passing is beyond the scope of this standard and for individual laboratories to establish based on their Quality Assurance system; however, the section was reworded and the following phrase was added: "Criteria for the successful completion of the above assessment methods shall be established by the principal trainer in advance of being assigned."
88	21	4.6.3 b		E	Lowercase a in Answer	Change "Short Answer" to "Short answer"	Accept
89	62	4.6.3.b		editorial	"Short Answer" does not need to be capitalized	change to short answer.	Accept
90	32	4.6.3.c)1		E	Are "peers" implying lay folks and not forensic document experts?	Define "peers" as either layperson, FDEs (but not instructors), or other persons (e.g., Latent Print Examiner).	Reject with modification: The word "peers" was removed and the section was reworded to clarify the intended meaning.

	A	D	E	F	G	H	I
91	33	4.6.3.d)		E	In accredited laboratories, trainees shall not examine real casework prior to authorization.	Forensic examination of mock casework and/or casework post authorization.	Reject: Part of a training program does include examining casework, even though the trainee will not be actually working actual casework and issuing reports on it. Furthermore, supervised casework is a common part of a training program after establishing competency and achieving authorization to perform casework.
92	15	4.6.4		T	For those who trained many years ago when training did not need to be documented, the trainer may no longer be alive.	For those whose training was completed before requirements were necessary to document the program, the document examiner can provide documentation of continuing education, publications, research, and other professional activities that fulfill this standard.	Reject with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.
93	37	4.6.4		E	States that a principal trainer determines if a trainee has successfully completed a training program.	For an accredited laboratory, successful completion of the training program is determined by meeting the quality assurance program requirements and its authorized approvers. The principle trainer/training coordinator is responsible for documentation, monitoring progress, and providing feedback throughout the training program.	Reject: Defining specific criteria for successful completion of the training program is beyond the scope of this standard and for individual laboratories to establish based on their Quality Assurance system.
94	95	4.6.4		T	This section lists the type of documentation required. It should be noted that there has never been a requirement within the profession to maintain documentation of training records prior to ASTM E2388 (2005), unless it was a specific laboratory's policy. It would be impossible for many FDE's trained in the 1980s, 1990s, early 2000s and perhaps others to obtain such information as many trainers from these time periods are deceased and/or some public agencies no longer maintain these very old records. In fairness to such FDEs and for clarification to the reader of the standard, a note should be added recognizing this fact.	Add the following NOTE at the end of this section. "This standard acknowledges that qualified FDEs who trained many years ago may not have documentation as required in this standard." Or, "The documentation required for a trainee's record is from the publication date of this standard forward."	Reject with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.
95	96	4.6.4		T	The last paragraph ends with the words "detailed knowledge". What does "detailed" mean? An overview or down to the very last detail? In Objectives for Training, the ABFDE defines the terms "Understand" and "Working Knowledge" for the level of knowledge in a specific training subject. "Understand" is define as "To have knowledge of the basic principles or facts. Implies further research may be needed before conducting certain examinations". "Working Knowledge" is defined as "To have substantial knowledge and case experience. Implies the ability to conduct routine examinations without further research." Various training subjects are then classified in Objectives for Training as requiring either an understanding of the subject or working knowledge of the subject. Using the definition of "understanding" to describe an examination area the FDE is not tasked to perform is much more clear and consistent with descriptions already being used in the profession.	Delete the words "demonstrating detailed knowledge" and replace with "an understanding of the procedure and potential results". Also, add the words "and offices" after the word "laboratories" because not all private examiners refer to their workplace as a "laboratory", rather define their workspace as an office, even though it has laboratory equipment.	Reject with modification: The phrase demonstrating detailed knowledge is part of the academic model described by Bloom's Revised Taxonomy, referenced in Section 4.6.2. Under Bloom's Rev. Tax., it is important to use wording that allows for auditing of a requirement, i.e. someone has demonstrated that they know something, as opposed to just understanding. The last paragraph was reworted to read: "The work of some laboratories or offices is concentrated..."

	A	D	E	F	G	H	I
96	103	4.6.4		T	Prior to this proposed standard as well as other prior standards, there was no requirement to document the record of training nor was there any published outline or manual to document the training. The trainee was at the mercy of their trainer to train the trainee accordingly.	Add the wording that a trainee who has been trained prior to the published standards that their training is accepted retroactively to the publication of the standard.	Reject with modification: The statement "This standard is intended to be applied prospectively, and not retroactively." was added to Section 4.1 to make clear that the standard is not retroactive.
97	16	4.7		T	The syllabus is too ill defined and over generalized. The paucity of references in the bibliography is glaring.	Add numbers for each section that can correspond to the SWGDOC numbers, as an example. This will assist in referencing the specific training. In addition, add references to the bibliography that are related to the training such as the training section of the May 2021 NIST report.	Reject: Section 4.7 identifies the foundational topics that should be covered as part of the syllabus of a training program and is not designed to be a replacement for the specific training program in its entirety. It is expected that these topics will be expanded upon by the Principal Trainer when developing a training program. Specific references on each topic would be beyond the scope of this standard, and any document that is not specifically referenced within the standard is not included in the bibliography.
98	43	4.7		T	The syllabus omits many important topics relating to law and professional ethics.	Consult the OSAC Legal Task Group to obtain a document that details many of the things that a forensic examiner should know about testimony and related matters.	Reject: The commenter did not provide a specific recommendation for changes to the document. The WG reviewed the document referenced by the submitter, but providing individual learning objectives is beyond the scope of this document, which is to set minimum requirements specifically for FDE training programs. As stated in the scope, this standard does not cover all aspects of training for the topics addressed. The referenced document would be more appropriate for a general Forensic Scientist training program standard rather than specifically to Forensic Document Examiners.
99	44	4.7		T	Some of the headings in the syllabus are extremely broad. For example, "human factors" should be accompanied by the pertinent subtopics.	Include more discrete subtopics for the broader topics in the syllabus. For each topic or subtopic, include learning objectives and suggested reading materials. And for each topic and subtopic include learning objectives and suggested reading materials.	Reject: The commenter did not provide a specific recommendation for changes to the document. Regardless, providing Individual learning objectives and suggested reading materials are beyond the scope of this document, which is to set minimum requirements for FDE training programs. As stated in the scope, this standard does not cover all aspects of training for the topics addressed.
100	97	4.7(e)		T	In the Syllabus, "Photography" is listed followed by the heading of "Digital Imaging" under which is "Digital Photography". Clarification is needed. Is this standard stating that the FDE must learn 35mm film photography and wet chemistry in the darkroom (as we practiced before the digital age) and also learn to use a digital camera and how to process those images using software programs? Also, General photography vs. Document photography sound like vacation photos vs. case work photos. Use only one category for Photography to include "Camera Basics" (i.e., understanding f-stops, shutter speed, macro settings, etc. – film or digital camera) and Digital Imaging as a separate heading.	Make only one heading for Photography to include both film and digital cameras. Delete the term "General Photography" and replace with "Camera Basics". Under the heading "Digital Imaging" delete "digital photography" since it will be included under the heading of "Photography".	Reject: General photography does not refer specifically to cameras, and in fact encompasses numerous topics including the basics of taking proper images. Accordingly, it makes sense to keep digital photography as part of the digital imaging category.
101	22	4.7 j		T	Does Physical Matches need a "procedures and protocols" bullet point?		Accept

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102	23	4.7 k		E	Fourth bullet point is missing comma	Add comma at end of fourth bullet.	Accept
103	104	4.7(n)		T	I personally do not accept charred or liquid soaked document cases, but refer such inquiries to someone else for such work. However I feel a trainee should have some background on these topics.	Elaborate on the wording examination and decipherment to apply to only those examiners who accepts such cases.	Reject: Knowledge of how these examinations is important even if an examiner is not themselves conducting those examinations.
104	98	4.7 (n)			<p>It is a known fact that not all FDEs in a public agency or in private practice perform charred and liquid soaked document examinations on a routine basis, even once in 20 years, and may never perform such examinations and refer such examination to another source, such as a document conservationist, archivist, or another laboratory. For this reason. 4.7(n) should contain a "NOTE" that these are not routine examinations and all FDEs may not be fully trained to perform such an examination. In Objectives for Training the ABFDE define the terms "Understand" and "Working Knowledge" for the level of knowledge in a specific training subject. "Understand" is defined as "To have knowledge of the basic principles or facts. Implies further research may be needed before conducting certain examinations." "Working Knowledge" is defined as "To have substantial knowledge and case experience. Implies the ability to conduct routine examinations without further research."</p> <p>Various training subjects are then classified in Objective for Training as requiring either an understanding of the subject or working knowledge of the subject. An FDE should have an "understanding" (per the ABFDE definition) of the procedures for charred and liquid soaked documents, but does not have to have the "working knowledge" to perform these exams if such exams are not of the type done in private practice office or public agency laboratory. In ABFDE's "Objectives For Training"*, Section XXI Miscellaneous Document Problems, the facts just stated are supported in Item #2 which reads: "Have an understanding of techniques and common solutions used to restore and preserve charred documents." Liquid Soaked documents is not mentioned. Standard 115 should adopt the position of the ABFDE that an FDE only needs to have "an understanding" of the procedures used to exam charred and liquid soaked documents.* (10-21-10 ed, on web site as of February 2020),</p>	<p>Add a NOTE at the end of this section that reads: "Some types of examinations listed in the syllabus may not be offered by a specific public agency laboratory or private office/laboratory and be referred to another agency. However, the trainee must have an understanding of the procedures used for such examinations, but may not be trained to perform such cases.</p>	<p>Reject: The commenter's request is specifically discussed in Section 4.6 which reads: "The work of some laboratories (offices) is concentrated on particular examinations. The training in areas for which the trainee will not be tasked shall still be addressed in training but could be limited to demonstrating "detailed knowledge"."</p>
105	68	4.9		T	The recommendation states that a senior examiner supervise the former trainee's casework "for a period of time," without specifying the amount of time. Leaving this open-ended is ill-advised. Given the errors that inexperienced examiners are prone to make, I recommend that the casework supervision period be for at least FIVE (5) years.	Change "for a period of time" to "for a period of five (5) years."	Reject: The commenter's request is beyond the scope of this standard and per Section 4.9, this recommendation is subject to individual laboratory policy.

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106	45	Annex		T	The bibliography is not a substitute for a list of recommended readings. Such a list should be provided in § 4.7 on every topic in the syllabus. The references provided, for example, are of little value on topics such as probability and statistics, or the law and art of testimony.	Eliminate the bibliography and place appropriate references under each subsection of § 4.7. We also suggest making clear what is meant by the 'law and art' of testimony, i.e., not being advocates for a particular view on admissibility, but merely issues such as the rules governing admissibility and rules/recommendations related to courtroom demeanor.	Reject: The bibliography is a list of documents that were utilized in the creation of this standard and is not meant to be a comprehensive list of references for each and every topic required in the syllabus, which would be beyond the scope of this document. It is up to the principal trainer to identify specific recommended references for each topic when developing a training program.
107	69	Appendix A (Bibliography)		T	Item numbered 5 in the Bibliography is a 2005 article by Joseph L. Parker expressing his subjective opinion as to why FDE Training must be for a minimum of 24 months. No studies are cited to support the proposition that 24 months full-time training produces more competent FDEs than equivalent part-time training over a period of four years. And NO such studies exist! Parker cites two Kam studies (footnotes 14 and 15) at page 81 of his article to support his statement that the FDEs most likely to have erred in court confrontations with Osbornian FDEs who had 24 month resident training are those without 24 month resident training. However, the two Kam studies cited by Parker had nothing to do with comparing the outcomes of court confrontations or test results between FDEs with 24 month resident training and those without; the Kam studies simply established that Osbornian FDEs were more accurate in their examination results than lay persons. Parker's 2005 article makes other misleading statements and seeks to essentially eliminate competition from FDE's who received equivalent training on a part-time basis over 4 years, despite such part-time training having been deemed acceptable in the 2005 ASTM consensus training standard FDEs and in the subsequent 2013 SWGDOC consensus training standard for FDEs.	The 2005 Parker article (item number 5) should be DELETED from the Bibliography	Accept with modification: The 2005 Parker article was removed and the reference was replaced with ASB Standard 011, Scope of Expertise, and the Accuracy and reliability of forensic handwriting comparisons PNAS Article.
108	17	Bibliography		T	The bibliography is weak and the explanation for this weakness is not convincing. What does "Locard's Exchange Principle" have to do with training? Parker's article should be deleted as it is a personal opinion and not based on facts or research. What does the terminology have to do with training other than learning the proper words to use? Right now there is almost nothing in the bibliography that will assist in understanding or conducting an effective training program. Just limiting a bibliography to the references in the standard sounds evasive and more like an excuse not to include relevant papers and articles on training.	References to Terminology should be included in 4.7 a), not in the bibliography. Pages 155 through 177 of the May 2021 NIST report should be added to the bibliography. This is truly a well thought-out chapter and an intelligent approach to the subject that should be required reading for any training program for forensic document examiners.	Reject: The bibliography is a list of documents that were utilized in the creation of this standard and is not meant to be a comprehensive list of references for each and every topic required in the syllabus, which would be beyond the scope of this document. It is up to the principal trainer to identify specific recommended references for each topic when developing a training program.
109	63	Bibliography		editorial	Add the SWGDOC Standard Guide for Minimum Training Requirements for Forensic Document Examiners. As an example of the duplication of wording, see 4.1 in both standards.	Add SWGDOC Standard Guide for Minimum Training Requirements for Forensic Document Examiners	Reject: This proposed document is being developed to supersede the SWGDOC Standard, and the SWGDOC Standard was not utilized in the creation of this standard, and as such would be an inappropriate reference.

	A	D	E	F	G	H	I
110	99	Bibliography			<p>Item #5, the Parker article, published in the ASQDE Journal touts what he refers to as the "mainstream Osbornian" examiners and their claim that the 24 months of resident training "is a long standing industry standard". In another paragraph he references a paper presented by Gideon Epstein at the AAFS Conference (1992), to support his training claim, however in this presentation/paper Epstein states, "It has long been recognized by the profession that no standardized program was in use and that the training often depended on the individual needs of the training laboratory." Epstein also recommend the profession adopt a standardized 2-year training program. Subsequently, the ASTM E2388 (2005) training standard was the first consensus standard for training. Parker's article also misstated ASTM E2388 training standard by implying it only supported a 24 months resident training, leaving out the part time equivalent over four years which is used in the private sector. Other misinformation includes ABFDE requiring 24 months training since its inception, but he does not mention the ABFDE waived this requirement for several years after they incorporated. Likewise, the article inaccurately states that ASQDE has required 24 months of training since 1942, however their documents support that training could be waived in exchange for six-years of full time employment during the 1990s. The Parker article should be deleted due to the selective and misleading information presented and its bias in supporting only the "Osbornian" point of view concerning training, rather than the consensus of the profession which includes part time training, the equivalent of 24 months of full-time training over four years, as published in ASTM E2388 (2005 through 2011) and the SWGDOC standard (2013). Articles in the Bibliography of an ASB standard or an American National Standard should be factual, providing accurate unbiased information to the reader, not the misleading opinion of the author.</p>	Delete #5, the article by J.L. Parker.	Accept with modification: The 2005 Parker article was removed and the reference was replaced with ASB Standard 011, Scope of Expertise, and the Accuracy and reliability of forensic handwriting comparisons PNAS Article.
111	100	4.7.e		T	Add to Section e " electromagnetic spectrum" and " instrumentation capable of spectral analysis"	Add to Section e " electromagnetic spectrum" and " instrumentation capable of spectral analysis"	Accept

	A	D	E	F	G	H
1				Deadline of Submission of Comments:	11-Sep-23	
2				Document Number:	ANSI/ASB Std 155	
3				Document Title:	Standard for Minimum Training Requirements for Forensic Document Examiners	
4						
5						
6	#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Editor or Working Group Review
7	10	General	E	The standard lists numerous topics for training on courtroom procedures but doesn't list the Brady doctrine. Last round of comments we noted that the group should consult the LTG on what legal topics should be included but we're not sure how this was adjudicated (it's not in the current version).	Placing "The Brady Doctrine" in the list would be critical - thank you.	Reject: Due to the numerous jurisdictions in which FDEs work, there are many relevant rulings and standards that may apply. In order to be more broad and encompass everything, "relevant law" should encompass the discovery procedures, admissibility standards, and other legal standards of the relevant jurisdictions in which the FDE is practicing.
8	11	3.2	E	word "by" needed between words "trainer" and "undertaking"	Insert word "by" between words "trainer" and "undertaking"	Accept
9	12	3.3	E	Change "to perform forensic analysis" to "reliably perform the tasks routinely performed by forensic document examiners"	Make change as recommended in comment	Reject: Competency is not specific to forensic document examination and therefore creating a proprietary definition would be unnecessary. Additional, ASB leadership as advised again using words such as "reliably" when it is not quantified in that section, as it leaves it up to the user to interpret what is "reliable"
10	13	3.5	E	Replace entire sentence with "Information that is known to be true as opposed to information that is derived from subjective analysis or inference"	Make change as recommended in comment	Reject: The suggested change does not add anything beyond the balloted definition.
11	14	3.7	E	Replace entire sentence with "Information, knowledge, or training gained by interaction with or demonstration by pertinent industry representatives from manufacturers, businesses or laboratories (e.g., paper mill, copier manufacturer) that are potential sources of information that can be relevant if not necessary to the work of a forensic document examiner"	Make change as recommended in comment	Reject: The suggested change does not add anything beyond the balloted definition.
12	15	3.9	E	There needs to be a list of criteria to define "credible" since it is otherwise strictly subjective. Otherwise, delete "credible" at the beginning of the sentence (you already have "reliable" in the latter part of the sentence)	Make change as recommended in comment	Reject with modification: Credible is determined by the principal trainer, and as noted in Section 4.6.2., may include regionally accredited educational institutions or equivalent; however, ultimately it is up to the principal trainer to approve any outside training. To address the redundancy, "reliable" removed, and a reference to Section 4.6.2 was added.
13	4	3.9	E	There is no indication to how these 'credible organizations or individuals' are determined.		Accept with modification: Section 4.6.2 cross reference added to address what credible organizations or individuals are.
14	5	3.11	E	"on an almost daily basis" excludes independent document examiners who are not working in a government-type lab.	Delete "on an almost daily basis"	Reject: "On an almost daily basis" does not exclude those in independent laboratories.
15	16	3.11	T	Replace "in-person" with "the" and replace "almost on a daily basis" with "throughout the entire training period" because "in-person" and "almost on a daily basis" connotes full-time on-the-job training and this standard presumably permits part-time training over a four-year period	Make changes as recommended in comment	Reject: The implication of the definition is not that training must be full-time. Accordingly, the suggested change could significantly alter the interpretation of the standard to require direct supervision for the entirety of the training period, inclusive of every day. This standard is not requiring full-time training, nor is it requiring direct supervision of every single day. By including almost daily as balloted, it allows for less than 100% direct supervision

	A	D	E	F	G	H
16	30	3.11	E	Assuming the working group recommends leaving out the "on an almost daily basis" in section 4.5, then the words should also be eliminated in this section for consistency,	Eliminate the words "on an almost daily basis"	Reject: The implication of the definition is not that training must be full-time. Accordingly, the suggested change could significantly alter the interpretation of the standard to require direct supervision for the entirety of the training period, inclusive of every day. This standard is not requiring full-time training, nor is it requiring direct supervision of every single day. By including almost daily as balloted, it allows for less than 100% direct supervision.
17	17	4.1 (first sentence)	E and T	Replace "generally used body of knowledge and experience" with "historical and generally accepted guidelines for training" so that the first sentence would read: The procedures outlined in this document are grounded in the historical and generally accepted guidelines for training in the field of forensic document examination"	Make change as recommended in comment	Reject: This standard is not a historical standard of how training has been done in the past; rather, it is setting the standard going forward. As is explicitly stated in section 4.1, "This standard is intended to be applied prospectively, and not retroactively."
18	8	4.2 a)	E	History has proven that a college degree is not the only measure of intelligence. To be practical, creative, and analytical are the true gauge of intelligence. A college degree cannot insure that a person has those qualities. The ability to do the work and understand the scope of the work is the higher requirement that should exceed a college degree requirement. Forensic Document Examiners for over 100 years have learned the trade by apprenticeship alone. When government agencies hire someone for a handwriting department, it requires a college degree, then the apprenticeship is started by trained examiners. Private examiners still learn through an apprenticeship process. Private examiners also have an advantage over government trained examiners with college degrees because we are not constrained by only certain types of examinations, but we learn all facets. The individual person and their ability to do the work and grow in knowledge is very important. I worked on a government job for 25 years. I was an Administrative Assistant II working my way up the ladder. But then, just as now, the ones with college degrees were given the greater honor as if they were smarter. They weren't and some of them couldn't write constructive sentences. I don't know how they made it through college. I love forensic document examination. During the 17 years that I have been continually learning the trade, I have loved it. I have found the same thing I did in the 25 years I worked on a government job, the college educated were not smarter and some had less intelligence. Their degree did not mean they could do a better job.	Please add a way into forensic document examination other than a college degree. Since no colleges or universities in the US or Canada provide a degree in Forensic Document Examination, with the requirement even a Veterinarian degree would suffice but it sure wouldn't mean they could do the job. Please ensure this proposed requirement does not stop people who are practical, creative, and analytical (the true sign of intelligence) from being able to be a privately trained document examiner. It is just wrong. I currently work 50 - 60 hours a week as a document examiner. It is the most fulfilling job of my life.	Reject: The requirement for a college degree within the field of Forensic Document Examination has been a requirement since at least ASTM E2388:2005. Furthermore, a college degree that includes STEM coursework ensures that trainees will have the minimum KSAs for conducting the scientific studies they will learn during a training program.
19	27	4.2(a)	T	Given that FDE's need to be knowledgeable in the artistic aspects of printing processes, photography (including Photoshop), document preservation, etc., is it wise to require a minimum of 24 hours of STEM in their college curriculum? FDE's often consult with Artists, Professors, Historians, and other traditionally artistic professions during casework, so this requirement would be discouraging a segment that could contribute a great deal to the field of Forensic Document Examination.	The requirement should read: Possess and document a minimum of a bachelor's or foreign equivalent degree from a regionally accredited educational institution or equivalent.	Reject: The requirement for a college degree that includes STEM coursework ensures that trainees will have the minimum KSAs for conducting the scientific studies they will learn during a training program. While other fields may impact the various examinations conducted by FDEs, the underlying methodologies are based in scientific principles. The NOTE adds additional clarification.
20	18	4.3 (b)	E and T	Delete "remaining" and insert after the word "knowledge" the following words: "to train the student in those topics of instruction that the trainer is not proficient in." so that the entire first sentence would now read: "Be proficient in most topics of instruction in this program and has engaged an associate trainer with the required specialized knowledge to train the student in those topics of instruction that the student is not proficient in."	Make changes as recommended in comment	Reject: The recommended change does not add anything beyond what is included in the balloted version.
21	19	4.3 (e)	E	Replace "and ground" with "including ground"	Make change as recommended in comment	Reject: Ground truth known is explicitly different than casework, and accordingly the recommended change is inappropriate.
22	20	4.3 (g)	E and T	Delete "when necessary" at end of sentence	Make change as recommended in comment	Reject: The recommendation does not include any rationale. Furthermore, the recommended change does not add anything beyond what is included in the balloted version. In laboratories with pre-existing training material, it may not be necessary to develop new practical examinations, or this task may be given to someone other than the principal trainer. Accordingly, "when necessary" is appropriate to account for variation between laboratories

	A	D	E	F	G	H
23	21	4.5 (para. 1, first sentence)	E and T	Replace "workplace" with "continuous" so that the sentence will read "The training program shall be a structured, documented, and systematic apprenticeship program of continuous supervised learning."	Make change as recommended in comment	Reject: The recommendation does not include any rationale. Furthermore, the recommended change does not add anything beyond what is included in the balloted version.
24	22	4.5 (NOTE 2)	T	NOTE 2 provides: "4,000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training program described by ASTM E2388:2005, <i>Standard Guide for Minimum Training Requirements for Forensic Document Examiners.</i> " ASTM E2388-05 and SWGDOC Training Standard ver. 2013-1 specifically stated that "the training program shall be the equivalent of a minimum of 24 months full-time training under the supervision of a principal trainer" and that "the training program shall be successfully completed in a period not to exceed four years." The part-time equivalent option has been in every consensus minimum training standard heretofore approved and published by ASTM and SWGDOC because the committee(s) responsible for publishing those standards recognized that it is customary to train on a part-time basis in the private sector because, unlike public sector trainees who are salaried employees, private sector trainees are usually working to support themselves and their family while training part-time to enter a new career as a forensic document examiner. Unless it is the intent of this ASB Consensus Body to eliminate the 4-year part-time training option typically encountered in training FDEs in the private sector that was approved and included in every prior consensus training standard published by ASTM or SWGDOC, the same statement that appears in ASTM E2388-05 should be included in this standard - namely, ""The training program shall be successfully completed in a period not to exceed four years."	Change NOTE 2 to read: "4000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training program described by ASTM E2388:2005, <i>Standard Guide for Minimum Training Requirements for Forensic Document Examiners,</i> which provides that " the training program shall be the equivalent of 24 months of full-time training under the supervision of a principal trainer and shall be successfully completed in a period not to exceed four years."	Reject: As part of ASB standards, it is not permissible to add requirements in notes. The suggested change, while a quote, could be interpreted to be a requirement and is therefore inappropriate. The Note is present to establish where the 4,000 hours is coming from, and does not set any additional requirements. Nothing in this standard requires that the training cannot take a longer period of time.
25	23	4.5 (para. 4, first sentence)	T	Delete "and is expected to work almost daily with the instructor at their laboratory or office." because this language connotes full-time on-the-job training and this standard presumably permits part-time training over a four-year period.	Make change as recommended in comment	Reject: "...to work almost daily..." does not set a specific full-time on-the-job training. Rather, this requirement sets that the majority of the training must be workplace-supervised.
26	24	4.5 (para. 4, second sentence)	T	Replace "may or may not follow that trainee's casework for a period of time" with "shall review and verify that trainee's independent case work for a period of at least two years."	Make change as recommended in comment	Reject: The commenter's request is beyond the scope of this standard and this recommendation is subject to individual laboratory policy.
27	25	4.5 (para. 5, first sentence)	E	Insert "continuous" between "A" and "break"	Make change as recommended in comment	Reject: The recommendation does not include any rationale. Furthermore, the phrasing as written explicitly states "A break of a year or more", therefore the word continuous is unnecessary.
28	26	4.5 (para. 6, only sentence)	T	Delete ", or for less than 100% workplace supervised instruction" so that the sentence reads: "The reason for lapses or extensions in training shall be documented by the principal trainer."	Make change as recommended in comment	Reject: This section had no revisions in this round, and based on the ASB Procedures "Comments on a recirculation may only be accepted on revised sections of a document."
29		4.5. (par. 6)		Missing ", " after instruction (from WG)	Insert ", " after instruction (from WG)	Accept
30	1	4.5	T	Re: "A trainee may or may not be a salaried employee and is expected to work almost daily with the instructor in their laboratory or office.". I propose this or related additional wording to cover situations, e.g. Maui fire, emergency surgery, Covid, etc.	after the words "almost daily," add: ", unless the trainer and trainee agree to a break, that may be the result of a physical illness, natural disaster, or other appropriate reasons for a break."	Reject: The following paragraph explicitly addresses interruptions due to exigent circumstances.
31	2	4.5	T	Re: "A trainee may or may not be a salaried employee and is expected to work almost daily with the instructor in their laboratory or office." We now have remote testimony; therefore, remote situations are generally accepted by the judicial community.	add to the end: "or remotely."	Reject: While some courts accept remote testimony, the process of learning requires the demonstration of KSAs, particularly when equipment is necessary for conducting such examinations. Furthermore, while this standard allows for some distance learning, it explicitly states in section 4.6.2 that a training program shall not be based only on distance learning.

	A	D	E	F	G	H
32	3	4.5	T	NOTE 2 says "4000 hours is extrapolated from the "equivalent of a minimum of 24 months of full-time training" program described by ASTM E2388.05. <i>Standard Guide for Minimum Training Requirements for Forensic Document Examiners.</i> ". I suggest including the additional wording from ASTM E2388.05.."The training program shall be successfully completed in a period of not to exceed four years." This will add important context by quoting Section 6.1 and 6.1.1 to put a cap on the time a training program shall be completed. My suggestion is not about a break of a year or more. My suggestion is to imply and/or allow a trainee to work on an irregular schedule, a part-time schedule, and/or other intervals not requiring a pre-approved agreement of the principal trainer (with agreement of the trainee) to approve each and every break or extension in training. For example, the principal/associate trainer may be unavailable, or unable or otherwise not be in a position to consider and approve each and every new request to alter the training schedule. I suggest that having a "not to exceed four years" addition will allow a training program to be structured, documented and systematic by agreeing, in advance, of allowing the trainee work irregular schedule and also to not have to work almost daily with the instructor by advance agreement. The "work almost daily" concept is too limiting. Yes, it may be ideal; however, it can be awkward to ask anyone to comply. ...	Reword NOTE 2 to say " 4,000 hours is extrapolated from ASTM E2388.05 Standard Guide for Minimum Training Requirements for Forensic Document Examiners Procedure Section 6.1 and Sub-Section 6.1.1 as follows, the "equivalent of a minimum of 24 months of full-time training under the supervision of a principal trainer. The training program shall be successfully completed in a period not to exceed four years."	Reject: As part of ASB standards, it is not permissible to add requirements in notes. The suggested change, while a quote, could be interpreted to be a requirement and is therefore inappropriate. The Note is present to establish where the 4,000 hours is coming from, and does not set any additional requirements. Nothing in this standard requires that the training cannot take a longer period of time.
33	6	4.5	E	how do you define "workplace learning?" Are you limiting it to daily work in a lab setting, which may exclude independent document examiners?	Define "workplace learning" and make it apply to ALL types of document examiner trainers.	Reject: Workplace supervised learning is explained in Section 4.5 as being supervised by the principal trainer or an associate trainer, in which a trainee may or may not be a salaried employee and is expected to work almost daily with the instructor in their laboratory or office. As written in this standard, this applies to all Document Examination Training programs without exception.
34	7	4.5	E	again "almost daily" may exclude independent document examiners	Delete "almost daily."	Reject: "On an almost daily basis" does not exclude those in independent laboratories, nor does it set a specific requirement for the number of hours per day. Rather, this requirement sets that the majority of the training must be workplace supervised.
35	28	4.5	T	Note 2 reads that the 4,000 hours of training is extrapolated from the "equivalent of a minimum of 24 months of full time training" program published in ASTM standard E2388. The quote is not fully representative of the training description in E2388. The description in the ASB standard leaves off the following statement in E2388 which reads "The training program shall be successfully completed in a period not to exceed four years." The ASTM Committee recognized that in the private sector it is customary to train on a part time basis, because unlike government agency trainees who are salaried employees, private examiners are often working to support themselves/family while training part time for a new career. I think the committee should go on the record as to whether the intent is to eliminate the avenue of part time training commonly used in the private sector, and if this is not the intent then add the sentence from the ASTM standard (that was passed by consensus) acknowledging that training can be completed over a period of four years. The statement that the standard is not retroactive applies to those trained prior to its publication, but if applied prospectively it affects many future trainees in the private sector.	Rewrite Note 2 to read: 4,000 hours of training is extrapolated from the training program described in ASTM E2388 Standard Guide for Minimum Training Requirements for Forensic Document Examiners which reads that training is "the equivalent of a minimum of 24 months of full-time training ... to be successfully completed in a period not to exceed four years."	Reject: As part of ASB standards, it is not permissible to add requirements in notes. The suggested change, while a quote, could be interpreted to be a requirement and is therefore inappropriate. The Note is present to establish where the 4,000 hours is coming from, and does not set any additional requirements. Nothing in this standard requires that the training cannot take a longer period of time.

	A	D	E	F	G	H
36	29	4.5	T	<p>The second paragraph in Note 2 reads: "A trainee may or may not be a salaried employee and is expected to work almost daily with the instructor in their laboratory or office." A synonym of "almost" is "very nearly". Stating that the trainee must work almost every day with the trainee in his/her lab/office is not a reason requirement for the overwhelming majority of persons training in the private sector because private sector training is commonly done on a part time basis. ASTM E2388 acknowledged that training did not have to be on a full time basis by stating that training shall be completed in a period not to exceed four years. As I stated previously with regard to the first paragraph in Note 2, unlike government trainees who are salaried employees, those in the private sector commonly train on a part time basis because many must work while training in order to support themselves/family, so cannot be in the trainers lab/office for most of the day on a daily basis. The part time trainee can perhaps be in the lab/office several days a week for one-to-one instruction on equipment, case work review, learning equipment usage, etc., but reading books and articles, writing reports for critique by the trainer, creating exhibits for reports or trial, learning Photoshop (or other software programs) or darkroom procedures, doing research, etc. does not have to be done in the presence of the trainer at his/her lab/office. So, if the intent is not to eliminate part time training then include the sentence regarding training over a four year period that was put in ASTM standard E2388 by consensus of the forensic document committee and approved by E30 Forensic Science Committee. Earning the bachelor's degree requires study on one's own time as well as being in the class room with the professor. A trainee, likewise, spends time with the trainer and time on his/her own as well.</p>	<p>Eliminate the first sentence and replace it with the following sentence: "The trainee is expected to work one-to-one with the principal trainer on a regular basis". I am not recommending any changes to the second sentence.</p>	<p>Reject: The recommended change does not add anything beyond what is included in the balloted version.</p> <p>Additional clarification, the recommended change is to the second paragraph of section 4.5, not a second paragraph of NOTE 2.</p>
37	9	4.6.2	T	<p>I know it isn't 'written in red' but the statement regarding long distance learning has been disproven by accredited colleges and universities that are completely long distance learning and giving students degrees for attending by long distance learning. With the ability of programs like Zoom or Teams, etc. students can see what is happening in labs as well as if they were present.</p>	<p>This needs to be changed.</p>	<p>Reject: This section had no revisions in this round, and based on the ASB Procedures "Comments on a recirculation may only be accepted on revised sections of a document."</p>