

Public Comments Deadline: September 19, 2022

ASB ASB Best Practice Recommendation 165, Best Practice Recommendation for Analysis of Friction Ridge Impressions

#	Section	Type of Comment (E- Editorial, T- Technical)	Comments	Proposed Resolution	Final Resolutions
1	4.4.2	T	<p>Examiner thresholds for quality and value differ from person to person and day to day. This will not be consistent. This will also significantly increase analysis time, consequently increasing turnaround time and backlogs. Why recommend such an inefficient, unnecessary and overcomplicated practice? I'm deeply concerned that, while this is a best practice recommendation, it will be expected of us to adopt it and treat it as a standard regardless. I can foresee attorneys referencing this document in court to criticise examiners who do not conduct quality mapping. I strongly suggest changing the wording to "may," as "should" implies it is preferred or ideal for all examiners to do this (which I disagree with), while "may" implies that it is permissible and up to examiner discretion.</p>	<p>Change "should" to "may"</p>	<p><b>REJECT</b> - A Best Practice Recommendation "sets forth the optimal way to carry out an action or actions". A goal of this document is to provide a means by which an examiner may analyze, document, and assess the complexity of a given impression and do so in a way that can be applied consistently across the discipline. To date, the friction ridge discipline has provided little specificity or consistency to the application/documentation of the Analysis stage of the ACE process. Replacing the recommended "should" with the optional "may" would substantially diminish the value of this document in providing a means to increase consistency across the discipline.</p> <p>Best Practice Recommendations are not mandatory and any given FSP must take into account available resources when choosing to adopt any given recommendations.</p>
2	4.5	T	<p>Although this is a practical guide, quantifying and assigning minutiae amounts to these subjective complexities is not a good idea. It has already been determined that there is no scientific basis for a minimum minutiae standard; therefore, we should not be moving in that direction, which this section allows for. Also, were these numbers assigned with palm prints in mind? How do we know these numbers apply for both fingerprints and palm prints? Seems arbitrary to me.</p>	<p>Remove numbers.</p>	<p><b>REJECT</b> - A goal of this document is to provide a means by which an examiner may analyze, document, and assess the complexity of a given impression and do so in a way that can be applied consistently across the discipline. The numbers included within this document provide the specificity needed for the recommended consistency in application.</p> <p>The number ranges within the document are based on studies that measured the numbers of minutiae examiners marked and their ultimate decisions. However, these same number ranges are not being applied to the overall utility decision in this document but rather are exclusively associated with the assessment of the complexity of an impression for quality assurance purposes. There currently is no distinction in applicability of the number ranges between fingerprints and palm prints as there was no identified research supporting such a distinction at this time.</p>

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3	4.6	T	Additional documentation and mandatory consultation I can understand, but why blind verification and multiple verifications? Current research of examiners in blind and non-blind verification groups shows that those who conduct blind verifications make more erroneous exclusions, erroneous identifications and inconclusive decisions. Ultimately, blind verification is not as good as we may think it is. What is the research behind conducting multiple verifications? Seems like this would only further increase time spent on casework, leading to larger backlogs...	Remove blind and multiple verifications.	<b>REJECT</b> - Generally, the higher the complexity of the print, the greater an examiner's reliance on their interpretation of the information in the print as well as their personal threshold for decisions/conclusions. One effective way to address this greater impact of subjectivity in decision making is to include more examiners. As such, having multiple verifiers would provide greater support for the reliability of the decision/conclusion. Furthermore, the inclusion of blind verification could mitigate additional contextual/confirmational biases that may exert a stronger influence when the print is more complex.  The provided list of additional quality assurance measures are just examples and are not stated as specific recommendations. Therefore, it is up to the FSP to determine what additional quality assurance measures are most appropriate.
4	4.7.1	E	Font size is smaller than other sections	Increase font size for consistency.	<b>ACCEPT</b>
5	1, 3.1, 3.3, 3.6	T	Many consider ACE-V to be a method/methodology and equate it to the scientific methodology. There is nothing in the definition of "method" or "methodology" that implies a quantitative value. Per the dictionary, it is "a procedure, technique, or way of doing something, especially in accordance with a definite plan; a manner or mode of procedure, especially an orderly, logical, or systematic way of instruction, inquiry, investigation, experiment, presentation, etc; order or system in doing anything; orderly or systematic arrangement, sequence, or the like." In a statistician's realm, they assign the meaning of a quantitative value to it, but not in the friction ridge realm. It is ok for a word to have different meanings in two different realms.	Replace "process" with "method".	<b>REJECT</b> - The Friction Ridge Consensus Body debated and voted on the use of the terms "process", "method", and "methodology". The consensus opinion was to use the term "process".
6			The process is unnecessarily complicated with very little benefit gained at a significant cost to examiner efficiency in FSP's that carry case backlogs.		<b>REJECT</b> - Best Practice Recommendations are not mandatory. The Friction Ridge Discipline has been criticized as lacking consistency in application. This document provides a means to introduce some level of consistency in that application.
7			Use of definitive is an overstatement, the document encourages overstating results.		<b>REJECT</b> - The inclusion of the term "definitive" is in deference to the cited NIST standard and applies only to the examiner's assignment of the quality of observed data. Furthermore, both the NIST standard and the document clarify the use of "definitive" by presenting the opposing category of "debatable".