

Deadline of Submission  
of Comments: 10-Mar-25

Document Number: ANSI/ASB Std 173

Document Title: Standard for Education, Training, Continuing Education, and Certification of Forensic Toxicology Laboratory Personnel

Comment #	Text Line # (s)	Document Section	Type of Comment	Current Document Wording	Proposed Revision	Revision Justification	Final Resolution	
			E-Editorial T-Technical					
1	30	2	E	NA	Add BPR 122 to the Normative References	All other Stds and BPRs in Annex A are listed in the Normative References.	ACCEPT: BPR 122 was added to the normative references	
2		4.1.5	E	Referenced table appears to be inserted incorrectly and appears to be missing at least one column	Correct table to include all columns		ACCEPT: The redlined PDF copy of the document provided for public comment did not appropriately reflect that Annex B layout changes to a landscape mode. The clean version of the document was also provided for public review and did show the appropriate orientation of the Annex B table, with all columns included.	
3		4.3.4.2	E	Distinguish between "Attending seminars, lectures, professional meetings, and classes" worth 0.25 CE unit/contact hour and "Instructor-led courses at a post-secondary educational level."	Include "instructor-led courses - degree seeking" and "instructor-led courses - non-degree seeking", for 1 CE unit/3 course hours, and 0.5 CE units/laboratory course hour.		REJECT: Comments made on text not revised from the previous public comment period are generally not accepted. The CB did review the suggestion and did not agree with the proposed change. Section 4.3.4.1 indicates that the laboratory decides the number of CEUs each activity is worth. Section 4.3.4.2 recommends CEUs based on activities. Should a laboratory wish to expand upon the recommendations in 4.3.4.2, these two sections allow for the freedom to do so.	
4		5.5.1.	E	Laboratories cannot control what it listed on an accrediting agencies certificate. Certification may not have all of items listed.	Add as applicable that the end of the statement. Documentation of an employee's certification shall include a copy of a certificate, letter, or card from the certifying body that specifies, as applicable:		REJECT: Comments made on text not revised from the previous public comment period are generally not accepted. The CB did review the suggestion and did not agree with the proposed change. An acceptable certification body will be accredited under ISO/IEC 17024 (as stated in Section 4.4.4) and issue a certificate, letter, or card with the listed requirements.	
5			Ballot Comment	Annex B needs to be rotated so entire table is visible.			ACCEPT: The redlined PDF copy of the document provided for public comment did not appropriately reflect that Annex B layout changes to a landscape mode. The clean version of the document was also provided for public review and did show the appropriate orientation of the Annex B table, with all columns included.	