

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
14	Title	T	There is NO best practice for biased services being performed by a forensic science laboratory	Abandon document	<b>Reject:</b> Comment lacks explanation on what specific content of the document is believed to be a "biased service" and why the commenter believes so. Multiple laboratories already perform limited examinations on evidence items. This BPR is designed to help provide guidance on those procedures.
73	entirety	E	Overall, the document hasn't changed much from the version OSAC put forward and I am not dissatisfied with this version. It allows for the customer to be involved in the decision-making process while still allowing for not-for-profit labs to make fiscally-responsible decisions about what evidence to process or what latent prints to examine that can expedite results to aid in an investigation. Since there is nothing in this document that says it's okay to destroy evidence if you don't want to examine it (it actually says the opposite!), I don't see an issue with wrongful conviction lawsuits stemming from this document's use. Bottom line, this isn't saying labs have to perform limited exams; rather, it's saying what labs should consider if they do and the best ways to go about utilizing a limited examination policy.		Comment Noted. No actionable statement.
62	All		There are 18 'may' and 5 'can' statements and only 7 'should' statements. A BPR needs to have primarily 'should' statements.	May' and 'can' statements should be changed to notes since they are not recommendations.  Change many of the optional statements to what is recommended as optimal.	<b>Accept:</b> Wording of document changed to reflect "should" statements
25	Citations	T,E	Why are there no citations to support this position of limited examinations? The only citations are to definitions. These citations do no justify this non-scientific position of this document.	Provide citations, or refer back to OSAC for development of research	<b>Reject:</b> Unclear what is meant by "position" or what specific content the commenter feels needs to be cited. Additionally there are no known published documents regarding the topic of how to perform limited examinations in friction ridge, consequently no documents to cite regarding the process of doing them.  Recommend commenter contact OSAC directly for further research.
12	Document in it's entirety	T	The question of whether or not limited examinations should be conducted in latent print units is not settled. The existence of such processes poses significant risk and raises questions about ethics. This BPR appears on it's surface to be a document giving permission of what some examiners or agencies are doing, but without a scientifically sound basis for doing so. What is the research and evidence basis for this document? This is an issue of policy that is being forwarded under the auspices of science, for which there is not science supporting the justification for conducting limited examinations. Many examiners and agencies do not consider limited examinations in any form to be a best practice. ASB should not condone limited examinations until such time as sufficient research has been conducted and agreement within the industry have been gained to warrant such approval. Also, please be aware that some examiners consider limited examinations to not be scientific in that it is a process by which examiners selectively gather or selectively exclude data. This BPR supports the legal and academic challenger's position that our industry is merely an extension of the police.	Send the document back to OSAC for further development of research into the long term impact of limited examinations on ALL stakeholders. Also to establish if there is consensus in the industry prior to putting this document forward as a BPR.	<b>Accept with modification:</b> Statements added to new section 4.1 to reflect that this document does not state nor imply that conducting a limited examinations is best practice. Furthermore that this document does not take position on whether or not limited examinations should be done. The purpose of this document is to identify and set forth the optimal way to carry out limited examinations, should an FSP choose to perform them. Multiple laboratories already perform limited examinations on evidence items. This BPR is designed to help provide guidance on those procedures. Recommend commenter contact OSAC directly for further research.

13	Document in it's entirety	T	I have asked many laboratory managers, technical managers, and examiners if they would conduct limited examinations if they had the necessary resources to not conduct limited examinations. Without exception, EVERY lab manager, technical manager, and examiner has said they would not conduct limited examinations if they had enough resources. Given these responses, it is clear that the best practice in our industry is actually not to conduct limited examinations. Because this document outlines methods of limited examinations under the heading of a Best Practice Recommendation, it reads like conducting limited examinations is the industry best practice. IT IS NOT!!	Add to the beginning of the document "Conducting limited examinations is not industry best practice."	<b>Accept with modification:</b> Statements added to new section 4.1 to reflect that this document does not and will not take position on whether or not limited examinations should be performed.
51	Document in it's entirety	T	The problem with this document, and the practice of limited examination as a whole, is that it gives full consideration to the "customer" (i.e. law enforcement or prosecutor) and completely disregards the potential needs of any other stakeholder in the criminal justice system, such as defense attorneys, defendants, judges, jurors and other triers of fact. This practice shows overt bias to only one side of our adversarial system of justice, and is the furthest thing from "good science"	Abandon Document	<b>Reject with modification:</b> Statements added to new section 4.1 to reflect that this document does not and will not take position on whether or not limited examinations should be performed. Multiple laboratories already perform limited examinations on evidence items. This BPR is designed to help provide guidance on those procedures.
43	Entire Document	T	There is no consensus in our industry to support conducting limited examinations. From the ASB website "The Academy Standards Board develops consensus based forensic science standards within an American National Standards Institute accredited framework...". ASB should not consider the document until it is established that there is consensus in our industry on this topic.	In order for this to be published as an ANSI approved standard, consensus must first be established. This document has put the cart before the horse. Recommend rejecting this document and sending it back to OSAC to establish if there is consensus in the industry on conducting limited examinations. If there is not consensus, the document should be abandoned.	<b>Reject:</b> This document does not take position on whether or not limited examinations should be conducted. Furthermore, the phrase "consensus based standard" refers to the <b>process</b> by which the standard is developed as outlined by ANSI and including steps such as public comment periods to gain a more consensus-based view.  Per the ANSI website: "A voluntary consensus standard is a type of standard developed or adopted by voluntary consensus standards bodies through the use of a development process characterized by openness, balance, due process, consensus, and the right to appeals (see OMB Circular A-119)."  Per OMB Circular A-119: "Voluntary consensus standard" is a type of standard developed or adopted by voluntary consensus standards bodies, through the use of a voluntary consensus standards development process as described in Section 2e."
44	Entire Document	T	This document is inconsistent in terminology with other draft documents, specifically the range of conclusions. When "identification" is used in this document is that "source identification"? Would the same requirements exist if it is "support for same source". Would it need to be "strong support for same source?" What about the variety of labs that will move to a five conclusion range, and those that won't?	Recommend clarification of which level of conclusion corresponds to which approved action of limited examinations.	<b>Accept with modification:</b> Change "...multiple identifications..." to "...multiple source identifications..." in section 4.2.2 (now 4.3.2); and change "If no identifications are made..." to "If no source identifications are made..." in section 4.2.4. (now 4.3.4) Current statements are clear they apply to source identification(s) only, so further explanation added.

57	Missing	T	The current document does not address important human factors considerations that arise when the person or agency requesting an analysis (identify as a "customer") is able to direct or influence critical decisions in an analysis. In an examination that requires consultation with the "customer," it is especially important for examiners (1) to be aware of the strong potential for cognitive biases and (2) to implement procedural controls or analytical steps that can reduce the potential influence of customers preferences and contextual information.	Add a section on Human Factors considerations. The Human Factors Task Group recommends that this section include (1) a "warning" or alert regarding the elevated risk of cognitive biases when examiners are aware of customer preferences and contextual information in the case, including the nature of the offense; (2) the importance of procedural controls to reduce exposure of examiners to potentially biasing information; this is best accomplished by procedures in which a case manager or examiner handles communications with the submitting agency and a second examiner performs the examination "blind" to any information that is not essential to the analysis; (3) where blinding is not possible, examiners or laboratories should apply other tools to identify potential biasing information and to minimize the effects of bias in later steps of the analysis. An example of such a tool is the LSU-E worksheet describe in Quigley-McBride, A., Dror, I.E., Roy, T., Garrett, B.L., & Kukucka, J. (2022) A practical tool for information management in forensic decisions: Using Linear Sequential Unmasking-Expanded (LSU-E) in casework. Forensic Science International: Synergy, 4, 1100216. <a href="https://doi.org/10.1016/j.fsisy.2022.100216">https://doi.org/10.1016/j.fsisy.2022.100216</a> and available here <a href="https://osf.io/xm3ru/">https://osf.io/xm3ru/</a> .	<b>Accept with modification:</b> Statement "Examiners and FSPs should apply tools to identify potential biasing information and to minimize the effects of bias" added new section 4.1. Detailed list of potential human factors is out of the scope of this document.
66	multiple places		The use of customer conflicts with 167 and conflicts with ISO (ISO 17020 and 17025 both promote impartiality).	Change customer to be stakeholder and make sure this document does not conflict with other ASB documents that promote impartiality.	<b>Accept</b>
27	1 SCOPE	T	"...regarding how to conduct limited examinations..." This reads like conducting limited examinations is a best practice. This document should not include a "how to" section as limited examinations are not best practice.	Remove the "how to conduct limited examinations" from this section and remove any "how to" methods from the BPR. Rules of what must be documented and retained if you do limited examinations is fine, but a "how to" section is inappropriate. Furthermore, there are many more ways that limited examinations are being conducted around the United States than are mentioned here. This document is really only appropriate for outlining the risk assessment and documentation requirements for a lab that does conduct limited examinations.	<b>Accept:</b> Phrase "how to conduct" removed from the scope.
28	1	T	Limited examinations are not best practice.	Change the type of document to a guidance document as it's content applies to multiple other documents. ASB should refrain from any inference that limited examinations are a best practice.	<b>Accept with modification:</b> Statements added to new section 4.1 to clarify this document does not state nor imply that performing limited examinations is best practice, nor does it take position on whether or not limited examinations should be performed. Furthermore, discussion on if this document should become a Guideline or remain a Best Practice Recommendation already took place and was voted upon by the Friction Ridge Consensus Body.
67	scope vs 3.5	T	The scope says this is about friction ridge comparisons which included tenprints. The definition in 3.5 says it is for latent prints.	Either clarify the scope or clarify the definition of limited examination.	<b>Accept:</b> Change "friction ridge impression evidence" in scope to "latent friction ridge impression evidence."

29	2	T	Why are there no normative references? Why are there no references outside of terms at all? A scientific document should have references to support the position. Limited examinations are not science based, and should not be conducted. If you are going to say they are science based, then you need to provide the science to justify it.	Provide references. Even non-normative references for such a controversial topic should be provided.	<b>Reject with modification:</b> Statements added to new section 4.1 to clarify this document does not address a scientific method or process. The purpose of this document is to provide preferred technical practices and optimal variations in procedures for conducting limited examinations. At this time there are no known references that would be appropriate for this purpose, nor are they required for this document.
1	3.1	T	The "customers" usually consist of law enforcement officers or prosecutors. This doesn't provide defense with equal access to or authority over the testing of the evidence, until after an initial testing period has already been completed. It's important that all parties involved in the case agree on the relevance of all evidence, and are aware of the use of limited examinations.	Change "customer" to "relevant stakeholder(s)" in the terminology section, as well as all other clauses (e.g., 3.5, 4.1.1, 4.2.1, etc.).	<b>Accept:</b> All uses of "customer" in document changed to "stakeholder" or "relevant stakeholder." Definition of "customer" consequently deleted from section 3 as it was no longer needed.
15	3.1	T	Customer needs to include defense and the court. They are surely customers or users of the information as well. This is not an ISO document, and to pull an ISO definition is out of context. This needs to list out all stakeholders.	Add all relevant stakeholders to the definition of customer. A customer is any person or entity that uses the information conveyed by the Forensic Science Laboratory.	<b>Accept (with modification):</b> All uses of "customer" in document changed to "stakeholder" or "relevant stakeholder." Definition of "customer" consequently deleted from section 3 as it was no longer needed.
32	3.1	T	The definition is that the customer is merely the person requesting the examination, but critically fails to recognize the vested interest of many other stakeholders in the examinations.	Recommend changing to all stakeholders from commission of the crime through final adjudication.	<b>Accept:</b> All uses of "customer" in document changed to "stakeholder" or "relevant stakeholder." Definition of "customer" consequently deleted from section 3 as it was no longer needed.
30	3.3 Now 3.2	E	It is not appropriate to reference an ISO definition. That is out of context for this document	Define a term as it is to be used for this document.	<b>Accept:</b> The definition of Forensic Service Provider is already defined in section 3.3 in line with intention for the document.
31	3.5 Now 3.4	T	"evidence may exist that has not been partially or fully processed and/or latent prints exist that have not been analyzed and/or compared." This is a bad idea. This is contrary to the role of a forensic science laboratory. Look at this like a different testing lab. If you are a medical testing lab, and you are asked to do a full blood workup for a patient. Then you, as the lab, look at the demographics of the patient, and determine you're only going to run a cholesterol test because that is most likely the issue. You run the test, the patient has high cholesterol, and you don't do any other tests. Would you as a patient be OK with that? NO!! Nor should you be. There may be other issues going on. Forensic science likewise makes determinations that involve the health and safety of individuals. Why is it OK for us to "only run a cholesterol" because we have too much work to do. Our job is to determine the truth, there are other and better solutions for backlogs. Limited examinations should not be conducted.	End the sentence after the first semicolon. Furthermore, this document should condemn the use of limited examinations. Recommend adding strong language that limited examinations should not be conducted.	<b>Accept with modification:</b> Consensus body voted on a revised definition on 8/15 "Examinations of latent friction ridge evidence that are not complete as defined by Standard Operating Procedures (SOPs)". Language added to section 4.1 to clarify this document does not take position on whether or not limited examinations should be conducted.
59	3.5 Now 3.4	T	Limited examinations are applicable to latent friction ridge evidence only. These examinations are not applicable to tenprint friction ridge evidence.		<b>Accept:</b> Change "friction ridge impression evidence" in scope to "latent friction ridge impression evidence."
16	3.5 Now 3.4 NOTE 1	T	"performed in consultation with customer." This is where contextual bias first gets introduced. There is a plethora of research outlining the potential impact of bias on laboratory examinations. Why is there now a standard outlining how to use contextual bias in a laboratory to not convey all the data of the evidence? It appears that bias is acceptable if it means laboratories don't have to do the work. That is the base concerns with bias, that the laboratory makes decisions, that may be incorrect, based on information that is not directly known by the laboratory, it has merely been told to the laboratory. A laboratory should not make examination decisions based on what is told to them. The laboratory should test the evidence and determine the facts independent of information told to them.	Remove this, and all sections that authorize the use of bias or biasing information to make decisions on what should and should not be examined, how thoroughly the evidence should be examined, and the order in which evidence is examined.	<b>Accept with modification:</b> "Consultation with customer" removed from note. "Customer" changed to "relevant stakeholder" or "stakeholder" throughout document. Communication with stakeholders at different points prior to and during a limited examination is acceptable.

33	3.5 Now 3.4 NOTE 1	T	This is correct. Limited examinations are not random sampling. At least random sampling is considered scientific. This is a bias-based selection of items and areas to examine without any basis in the science.	Condemn the practice of limited examinations.	<b>Reject with modification:</b> Portion of 3.5 (now 3.4) note 1 regarding consultation with customer removed, but remains in other sections of the document. Any forensic service implies a customer-laboratory relationship and is articulated throughout other industry standards. Statements added to new section 4.1 to clarify this document does not take position on whether limited examinations should be performed.
2	4.1 Now 4.2	T	The FSP should document initial observations of all samples (e.g. origin or the prints, texture or smoothness of surface, if it's coated in any residue or dust).	Add a subsection that states something like the following: "The FSP should provide initial observations of all samples, especially if the evidence is in a condition that prohibits latent print recovery."	<b>Reject:</b> While documenting initial observations is best practice, it is out of the scope of limited examinations and is best noted in the upcoming ASB "Standard for Processing Evidence for the Detection of Friction Ridge Impressions" document. Commenter encouraged to participate in the public comment period for that document.
60	4.1 - processing Now 4.2	T	Section 4.1 had 2 shalls and 1 should statement. Since this is a BPR, should statements need to outweigh the shall statements.	Reword the recommendations to be should statements.	<b>Accept:</b> Section 4.1 (now 4.2) reworded to reflect "should" statements
3	4.1.1 Now 4.2.1	T	The standard states that an "FSP may decide not to process items determined by the customer to be irrelevant to the case." Exoneration cases have demonstrated that evidence that is considered probative early in a case may change with more information at a later stage of the case or additional prints may exist that could lead to the identification of additional persons of interest. Probativity is a legal decision that is made in the context of case information that can bias the examiner. This determination is being done at early stages of evidence processing which limits the evidence available for the rest of the case. While not all evidence may be analyzed, all evidence must be processed and documented to guard against the risk that important evidence is left behind.	Strike the following sentence: "FSP may decide not to process items determined by the customer to be irrelevant to the case."	<b>Accept with modification:</b> Sentence reworded to state relevant stakeholder will decide what is probative, and FSP should take such information into consideration but is not required to follow stakeholder opinions.
34	4.1.1 Now 4.2.1	T	At the time of the forensic examinations, which is typically early in an investigative process, probative value of the evidence is not necessarily known, nor should it be known by the lab or examiners. Many times, whether or not an item or area is probative is not known until years later. Hindsight is often required to determine if an item or area was probative.	Remove section 4.1.1	<b>Reject with modification:</b> Probativity of items is an accepted backlog mitigation strategy in all forensic disciplines. Sentence reworded to state information from relative stakeholder regarding which items are probative may be taken into consideration by the FSP. Section 4.1.3 (now 4.2.2) addresses how the integrity of the unprocessed items shall be maintained for potential future examinations.
74	4.1.1 Now 4.2.1	E	I think there should be more emphasis on consultation and not a customer decision.	Reword: After consultation with the customer, the FSP may decide not to process items determined to be irrelevant to the case.	<b>Accept with modification:</b> Sentence reworded to clarify the decisions on what to process are ultimately determined by the FSP, but alternate wording than suggestion was used.
37	4.1.1, 4.1.2 Now 4.2.1	T	I thought we were trying to eliminate the impact of bias on laboratory examinations. But if it means we don't have to do our job, then bias is OK?	remove sections 4.1.1 and 4.1.2	<b>Reject with modification:</b> The commenter does not provide specifics on why they feel these sections promote bias. Factors such as probativity of items and offense type are accepted backlog mitigation strategy in all forensic disciplines. New section 4.1 addresses bias considerations.
4	4.1.2 Now 4.2.1	T	This clause allows examiners to determine the extent to which particular items in a case may be processed, but this decision should be limited to prioritization, not completion of the task.	This clause should be edited to state: "Offense type may be taken into consideration when determining <b>how to prioritize</b> particular items, <b>but all evidence</b> in a case <b>must be processed</b> ."	<b>Reject with modification:</b> It is acceptable practice across all forensic disciplines to not process every item of evidence in a case. Additionally, using offense type as a backlog mitigation strategy is an accepted practice. Section reworded to reflect FSP's have a choice in how to limit the examination. Section 4.1.3 (now 4.2.2) addresses how the integrity of the unprocessed items shall be maintained for potential future examinations.

5	4.1.2 Now 4.2.1	T	Additionally, in an effort to mitigate contextual bias, details of the crime should be withheld from an examiner's knowledge as much as possible. While we recognize that smaller laboratories may not have the capacity to do so, this policy should be instituted in laboratories that have such resources.	Please consider adding a statement similar to the following: "The knowledge of contextual information relevant to the examination may be limited to technical leaders, or equivalent, that are not processing the evidence or conducting the friction ridge examination."	<b>Accept with modification:</b> New section 4.1 added regarding bias considerations. Specific bias mitigation strategies are up to the FSPs to determine and out of the scope of this document.
17	4.1.2 Now 4.2.1	T	"Offense type" being used is once again making decisions based off of bias. Our experience on the private side of the industry is that examiners sometimes "push" their conclusions to an unsupportable position if it is a crime against a person or a high profile crime.	Remove this, and all sections that authorize the use of bias or biasing information to make decisions on what should and should not be examined, how thoroughly the evidence should be examined, and the order in which evidence is examined.	<b>Reject with modification:</b> Use of offense type as a backlog mitigation strategy is an accepted practice. New section 4.1 added to address bias considerations.
35	4.1.2 Now 4.2.1	T	This involves a value judgement on victimization. Merely working cases in order based on crime type is not a limited examination. However, if crime type is used to do no work or less work on evidence, that is an issue. Also be aware that this is biasing information. Decisions to not work or not fully work items of evidence based on crime type is not appropriate.	Remove section 4.1.2.	<b>Reject with modification:</b> Use of offense type as a backlog mitigation strategy is an accepted practice. New section 4.1 added to address bias considerations.
58	4.1.2 Now 4.2.1	E	Who takes offense type into account? Is this the FSP or the customer? How is this decision recorded?		<b>Reject:</b> No actionable proposed resolution. Section 4.1.2 (now 4.2.1) reworded to reflect FSP is the entity to make these considerations. Use of offense type as a backlog mitigation strategy is an accepted practice.
18	4.1.3 Now 4.2.2	T	Cartridge cases may have a low success rate, but a latent print of value on a cartridge case can be extremely important information that a laboratory should convey.	Remove this, and all instances where a method of limited examination is given approval. Limited examinations are not the best practice, so there should not be a document that gives permission for certain types of limited examinations. If the goal of this document is to give guardrails to limited examinations, then those guardrails should be put in place, but permission should not be given in a best practice recommendation to conduct anything other than best practice. It is possible for this document to outline guardrails, without listing out specific methods of limited examinations that then read like it is best practice to conduct limited examinations. In this instance, the document reads like it is best practice to not examine cartridge cases or other "certain items...that have a low success rate." That is not best practice.	<b>Accept with modification:</b> Removed "(e.g. cartridge cases)" from sentence.
36	4.1.3 Now 4.2.2	T, E	Last sentence is inconsistent with the rest of the paragraph. Also, low success rate doesn't mean "no success". I don't think the ASB should condone limited processing of low success items.	Recommend removing last sentence of section 4.1.3	<b>Accept with modification:</b> A portion of the section was removed, remainder of the section was reworded and merged with section 4.1.2 (now 4.2.2) above.
55	4.1.4	T	4.1.4 does not have to do with limiting exams or limiting latent print processing. I'm not sure this section is relevant to this document. This seems like an evidence handling or evidence submission issue.	delete 4.1.4	<b>Accept:</b> This section is more appropriate for either an evidence collection document or a latent processing document. Section was removed.
6	4.2 Now 4.3	T	Some labs may not use ABIS and may use AFIS.	Change all instances of "ABIS" to "AFIS/ABIS."	<b>Reject:</b> "AFIS" and "ABIS" are generic terms that refer to any searching system, not a specific one. "ABIS" is a term that is inclusive of the term "AFIS." Furthermore, "ABIS" is the recommended term for all FSPs to use, regardless of their individual systems.
7	4.2 Now 4.3	T	Labs should determine and include in written procedures AFIS/ABIS candidate list thresholds, if they plan to restrict the ABIS/AFIS list to fewer candidates.	Add a subsection similar to the following: "Restriction of the AFIS/ABIS candidate list, from a particular database, should be based on a candidate list threshold defined by the lab and included in written protocols. Any deviations from protocols must be reported."	<b>Accept with modification:</b> Section 4.2.5 (now 4.3.5) reworded to state FSP procedures should address/include any restrictions on ABIS databases.

19	4.2.1 Now 4.3.1	T	How does the examiner know what is probative? This again introduces a method that approves of the use of contextual bias.	Remove this, and all sections that authorize the use of bias or biasing information to make decisions on what should and should not be examined, how thoroughly the evidence should be examined, and the order in which evidence is examined.	<b>Reject with modification:</b> Section will remain, but statements regarding bias considerations added to section 4.1.
20	4.2.1 Now 4.3.1	T	We need to ask ourselves what the role of a forensic science laboratory is. Is it to convey the information that answers the question of the person who submitted the evidence i.e., the investigator or prosecutor? NO!! The role of a forensic science laboratory is to convey all the data that the evidence holds. Anything else is a partial truth, and partial truths can, and in some horrifying cases of wrongful conviction did, misrepresent the story the evidence has to tell.	Remove the second sentence of section 4.2.1	<b>Reject:</b> The investigative needs of the submitting/requesting entity are appropriate to consider when deciding limited examinations as a backlog mitigation strategy. Additionally, statements in section address maintaining integrity of evidence so that future/additional examinations are possible.
38	4.2.1 Now 4.3.1	T	At the time of the forensic examinations, which is typically early in an investigative process, probative value of the evidence is not necessarily known, nor should it be known by the lab or examiners. Many times, whether or not an item or area is probative is not known until years later. Hindsight is often required to determine if an item or area was probative. Also the individual or agency requesting the examination is not the only customer and consumer of the results.	Remove all but the third sentence of 4.2.1. Recommend redefining customer as all stakeholders from commission of the crime through final adjudication.	<b>Reject:</b> Using probativity of items as known at the time of initial examination is an accepted backlog mitigation strategy. Additionally, statements in section address maintaining integrity of evidence so that future/additional examinations are possible. Use of "customer" in this context is the appropriate term due to the fact that the investigative needs of the submitting/requesting entity are the ones being considered.
39	4.2.1 Now 4.3.1	T	Why would there need to be a request for additional comparisons? Couldn't a lab initiate those exams themselves? Can any stakeholder make that request?	The last sentence of this section opens a can of worms. If nothing else, it reads like the lab cannot initiate the full examination themselves. Recommend removing last sentence of 4.2.1, and remove the "if requested" portion of the second to last sentence.	<b>Accept with modification:</b> Language changed to "...future examinations can be conducted if requested or at the discretion of the FSP" to reflect an FSP is allowed to initiate the full examination if doing so is acceptable per their SOPs.
61	4.2.1 - searching Now 4.3.1	T	Considering 'the customers' request is extremely biasing and discourages impartiality that is essential for a forensic analysis.	Change customer to be stakeholder to promote impartiality.	<b>Accept with modification:</b> "Customer" changed to "relevant stakeholder" or "stakeholder" throughout document. Communication with stakeholders at different points prior to and during a limited examination is acceptable.
75	4.2.1 Now 4.3.1	E	Again, I think the emphasis should be consultation, not customer decision.	Reword: ... Searches or comparisons may be discontinued if after consultation with the customer, it has been determined their investigative needs have been met. Evidence should be maintained so that future examinations can be conducted if requested. The customer should be advised that additional comparisons can be completed upon request	<b>Accept with modification:</b> Sentence reworded to clarify the decisions on what to process are ultimately determined by the FSP, but alternate wording than suggestion was used.
8	4.2.2 Now 4.3.2	T	The strategy described in this section is called "one hit and quit." It biases the investigation to seeking positive hits to persons of interest and consequently increases the risk of a wrongful accusation. If the person who committed the crime is not known to the police or has not previously been system-involved, One Hit and Quit would increase their opportunity to evade detection. One Hit and Quit should not be used.	Strike 4.2.2.	<b>Reject:</b> The term "hit" typically refers to results of an ABIS search. If commenter was using it in such a way, then comment is unrelated to this section. Additionally the recommendations of this section involve multiple identifications (either multiple persons to one item, or one person to multiple items) and consequently the objection to one ID is unrelated.
21	4.2.2 Now 4.3.2	T	This second sentence is the root of the potential to do harm in this proposed standard. "If the customer has determined their investigative needs have been met." What happened to the concept of working the case until the truth is determined if possible. For example, the FSP identifies a named suspect's print on a front door of a robbed convenience store and because he is scared, he says he has never been there. Then the FSP stops all work and the real perpetrator goes unidentified even though his prints are on other items. This and similar instances have occurred in our industry.	Remove the second sentence of section 4.2.1	<b>Reject with modification:</b> Sentence was reworded to change "customer" to stakeholder, and reflect the FSP choice in taking their investigation needs into consideration.

22	4.2.2 Now 4.3.2	T	"defer any remaining manual comparisons once each named person has been identified". What happened to the other ABIS quality prints?	Other ABIS quality prints should at least be searched. However, because this lists a method of limited examination, not just the guardrail, recommend removing everything after the first semicolon.	<b>Reject:</b> This section refers to manual comparisons only, not to ABIS searches.
40	4.2.2 Now 4.3.2	T	What is the science behind the idea that you can defer any remaining manual comparisons once each named person of interest has been identified. What is the scientific basis to justify this conclusion?	Remove all but the first portion of the first sentence up to the semicolon. "The FSP should develop and retain all suitable friction ridge impressions."	<b>Reject with modification:</b> As a BPR, this document does not address a scientific process or method. This document provides practical information and recommendations on issues such as preferred technical practices, optimal variations in procedures, and other similar issues related to limited examinations. Statements added new section 4.1 to clarify this. Content after the first semicolon is appropriate.
41	4.2.2 Now 4.3.2	T	So if I identify a suspect on a vehicle outside a robbery scene, I don't need to compare him to the prints inside the vehicle? If I identify him on the hood, I don't need to compare the prints under the driver's door handle? I'm sure that's not the intent of this section, but that is how it reads.	If this is not what is intended, clarification needs to be added. I recommend removing all but the first half of the sentence of 4.2.2	<b>Accept with modification:</b> Sentence reworded to add clarification.
42	4.2.2 Now 4.3.2	T	This section doesn't make sense. I can stop doing comparisons to a person after I identify them once on a surface or item, or I can stop doing comparisons to a person after I identify them multiple times? What's the effective difference between defer and halt? Are you saying a lab can completely reject doing more comparisons, regardless of the previously mentioned requests if they identify a person more than once?	Clarify this. Is it identify them once? Is it identify them more than once?	<b>Accept:</b> Sentence reworded to add clarification.
45	4.2.2 Now 4.3.2	T	This method of limited examination allows for un-named individuals to go unidentified despite the fact that the technology and ability exists to avoid this. This also runs the risk of misrepresenting the data of the evidence.	Remove the method portion of this limited examination.	<b>Reject with modification:</b> This document does not describe a method. As a BPR, this document provides practical information and recommendations on issues such as preferred technical practices, optimal variations in procedures, and other similar issues related to limited examinations. Statements added to new section 4.1.1 to clarify this. Unclear what content the commenter believed constituted a method.
69	4.2.2 Now 4.3.2	T	Why do multiple identifications to the same individual have to be made before comparisons can be halted? It matters not whether they touched it once or many times.	Change to "The FSP may halt comparisons after an identification has been made to an individual."	<b>Reject with modification:</b> Sentence was reworded for clarification of intent.
23	4.2.3 Now 4.3.3	T	Non-ABIS quality friction ridge impression comparisons MAY be completed upon request". Does this mean that without a request being made, the examiner can just forget the harder latent prints? I can see this one creating huge problems.	Remove the last sentence.	<b>Accept:</b> Sentence was removed.
46	4.2.3 Now 4.3.3	T	Why would a customer have to make an additional request for the comparisons to be conducted? This creates a difficult system to navigate. This section is not based on science. This also holds the potential to misrepresent the data of the evidence.	Remove second sentence of 4.2.3	<b>Accept:</b> Sentence was removed.
54	4.2.3 Now 4.3.3	T	Why does an additional request need to be made? Who can make the request? Can a jury member request it - no. Can the defense attorney request it independent of the DA - often no. Remove the last sentence.	Remove the last sentence.	<b>Accept:</b> Sentence was removed.
68	4.2.4 Now 4.3.4	E	Minutiae is spelled differently in the document than in the definition.	Use consistent spelling.	<b>Reject:</b> "Minutia" as used in the 3.6 definition is the singular form of the word. "Minutiae" as it is used in 4.2.4 (now 4.3.4) is the plural form of the word. Both versions in the context they are used are appropriate.
70	4.2.4 Now 4.3.4	T	Research and studies have shown auto-extracted minutiae searches to be very accurate for high quality/clarity prints. Why does a manually encoded search need to be completed if no IDs are made? This should only be needed for low quality/clarity prints.	Change to "For low quality/clarity prints where no identifications were made, the examiner should perform a second search by using manually-encoded minutiae or 'cleaning up' the auto-extracted minutiae."	<b>Reject:</b> While current ABIS algorithms have improved they are not infallible. The recommendation is consequently to follow up a no-hit image search with a manually encoded search.



76	4.2.4 Now 4.3.4	T	This is confusing. If you are talking within the scope of this document "Limiting Examinations" Then I would say limit the searches by doing one ABIS search with auto extraction/image "or" feature extraction/manual. The type of search auto/maunual should be left to the the FSP/examiner. Especially on higher qualtiy prints.	Change second manual search from "should" to "may" [or] eliminate section 4.2.4 entirely. What does this really have to do with limiting examinations? [or] Reword: The FSP may elect to perform automated searches using auto-extracted minutiae first (e.g., an image-only search). Then depending on the quality of the print, and no identifications, the examiner may elect to perform a second search using manual encoding.	<b>Reject:</b> The act of skipping a manually encoded search (performing an auto encoded search only) as part of a limiting an examination is not recommended. Furthermore, this section falls under the scope of limited examinations as it provides a guardrail of something not to do during a limited exam.
48	4.2.5 Now 4.3.5	E	This sentence doesn't make sense. It reads like this document is trying to dictate that every forensic lab should restrict which ABIS databases are searched. That's not going to happen. Most labs are trying to get more prints through more databases rather than restrict the searches.	Remove sentence.	<b>Reject with modification:</b> Sentence was reworded for clarification of intent.
49	4.2.5 Now 4.3.5	T	Most AFIS systems are currently capable of searching a latent print in a matter of seconds or minutes. This is not a big time saver for most laboratories, and due to the difficulty in getting prints searched through AFIS databases by stakeholders other than law enforcement and prosecutors, these searches should be conducted to the greatest extent possible at the time of the initial examinations.	Remove section 4.2.5.	<b>Reject:</b> ABIS searches require an extended time period to wait for results, as well as to compare every returned candidate of results. Additionally, non-searched databases can be searched at a later date.
56	4.2.5 Now 4.3.5	E	4.2.5 This wording is confusing. "should allow or require the restriction on"	reword 4.2.5 FSP policy should allow a restriction on which ABIS databases are searched. (e.g. depending on case offense type)	<b>Accept with modification:</b> Sentence reworded for clarification, with different phrasing than suggested.
47	4.2.5 Now 4.3.5	T	Why should the FSP policy require the restriction on which ABIS databases are searched? Isn't it best to search all available databases, and the only limitations be the limitations of the AFIS manufacturer?	Remove section 4.2.5.	<b>Reject with modification:</b> Sentence reworded to clarify restriction of databases is not required.
77	4.2.5 Now 4.3.5		I don't think this is clear on how it applies to limiting examinations.	Reword: The FSP may consider restricting the number of ABIS databases searched.	<b>Accept with modification:</b> Section reworded for clarity, but with alternate phrasing than suggestion.
9	4.3.2	T	The interchanging verbage of "notify," "document," and "report" leads to confusion. Any communication between FSPs and relevant stakeholders, such as the notification or reporting of information, must be documented in both the case file and the case report.	Please clarify that all information be documented in both the case file and case report, or insert an additional clause that all communication be documented accordingly.	<b>Accept with modification:</b> Paragraph removed from this section and revised to 4.2.3 and 4.3.6 to address communication.
71	4.3.2	T	As long as the FSP has a written policy regarding limited exams for processing evidence and halting comparisons, the FSP should only have to notify the customer in advance of limited exams for processing evidence items, not for comparisons. 4.2.3. lists BPRs for limited comparisons and is only recommended when each person of interest has been identified. Limited exams/processing of evidence items can affect the development of latent prints, which could affect a person of interest being developed via ABIS or comparison IDs.	Change to "Any FSP that performs or plans to perform limited processing examinations of evidence items shall notify any customers of that policy in advance."	<b>Accept with modification:</b> Paragraph removed from this section and revised to 4.2.3 and 4.3.6 to address communication.
78	4.3.2		I don't know what the spirit of this statement is to notify the customer in advance? You may not always know in advance (e.g. id subject)	delete line: "Any FSP that performs or plans to perform limited examinations shall notify any customers of that policy in advance." Or add "When possible, ...."	<b>Accept with modification:</b> Paragraph removed from this section and revised to 4.2.3 and 4.3.6 to address communication.
64	4.3.2 and 4.3.4 Now 4.4.3		4.3.2 says, 'The extent of the limited examination shall be documented in the case file and reported to the customer' and 4.3.4 says, 'Any discontinuation/stoppage of work in a limited examination should be fully documented in the case file.'	Remove the duplication by removing 4.3.4.	<b>Accept with modification:</b> Paragraph 4.3.2 removed from this section and revised to 4.2.3 and 4.3.6 to address communication. Section 4.3.4 (now 4.4.3) reworded to clarify it is not a duplication of concept.
10	4.3.3	T	If a sample/print is significantly altered or inhibited from future processing/comparison, the lab should report in in the case file.	Add a statement explaining that the FSP should report if additional processing/comparison is possible, why it may or may not be possible, and how the integrity of the sample is affected.	<b>Accept with modification:</b> Original section 4.3.3. deleted due to redundancy. Statement added to section 4.3.2 (now 4.4.2) to include reporting if additional processing/comparison is possible. Statement about how the integrity of the sample may be affected not included due to there being too many variables to accurately determine this.
65	4.3.3	E	4.3.3 is poorly worded. What is 'minimizing inhibitions'???	rephrase so the meaning is understandable.	<b>Accept with modification:</b> Section was deleted due to unessarily repeated content.
72	4.3.3	E	This is already state in 4.1.3, just using different words. The reporting of this is stated in 4.3.2.	Delete 4.3.3 or combine into 4.1.3 by rewording.	<b>Accept:</b> Section deleted due to unnecessarily repeated content.

79	4.3.3		I don't understand this. "minimizing the inhibition of future processing" Maybe try simplifying?	Reword: Any methods used for limiting examination must not prevent future examinations.	<b>Accept with modification:</b> Section was stricken entirely due to the concept of preserving non-examined/processed evidence already being covered in another section.
73	4.3.4 Now 4.4.2	T	This should also be reported out to the customer(s).	Change to "... in the case file and reported to the customer."	<b>Accept:</b> Language added to clarify discontinuation/stoppage of work should be included in the report.
11	4.3.5 Now 4.4.1	T	This standard should include a list of possible risks that come with implementing a limited examination policy. FSPs should also affirmatively document the limited examination processes it uses and the associated risks incumbent with the use of that practice.	Provide examples of risks associated with the implementation of limited examination policy, and consider adding the following statement: "FSPs must document the limited examination strategies that they implement and the associated risks in their SOPs."	<b>Accept with modification:</b> Statement added to new section 4.1 regarding FSPs needing to assess potential risks around limited examinations. Original section 4.3.5 consequently deleted to avoid redundancy. Furthermore, this document will not list out all potential risks and human factors as it would be out of the scope of the document.
50	4.3.5 Now 4.4.1	T	Why are you worried about risk if you're doing the right thing or the best thing for the evidence or case? Limited examinations, in forensic examinations, are inherently risk.	Recommend expanding this section. How is the risk to be assessed? What is the research associated with the risk assessment? Maybe include a risk assessment matrix? FSP should document and retain in the laboratory a copy of their risk assessment.	<b>Accept with modification:</b> Statement added to new section 4.1 regarding FSPs needing to assess potential risks around limited examinations. This document will not list out all potential risks and human factors as it would be out of the scope of the document.
52	4.3.5 Now 4.4.1	T	It is up to the FSP to assess the risks in deciding whether to implement a limited examination policy." I find it ironic that risks of poor policy should be taken into consideration, however no risks or potential risks are ever outlined in the document	Outline the risks in the document	<b>Reject with modification:</b> Statement added to new section 4.1 regarding FSPs needing to assess potential risks around limited examinations. This document will not list out all potential risks and human factors as it would be out of the scope of the document.
53	4.3.5 Now 4.4.1	T	If you know there are risks associated with a policy...and those risks are so possibly severe that they need to be documented in the best practices document, why would you ever do those exams? Plus I think there is liability for not just the agency and the examiner, but also for OSAC and ASB if their approved best practice is followed and results in a wrongful conviction. The processes outlined now have resulted in wrongful convictions in the past, so it is reasonable to assume that will occur again. Is ASB ready to assume that liability?	Due to potential liability for the FSP's, examiners, OSAC and ASB, abandon the document.	<b>Reject:</b> At present there is no standard prohibiting the performance of limited examinations. Additionally, this document does not take position on whether or not limited examinations should be conducted. This document provides practical information and recommendations on issues such as preferred technical practices, optimal variations in procedures, and other similar issues related to limited examinations.
63	4.3.5 Now 4.4.1	E	4.3.5 is poorly worded.	Change, 'It is up to the FSP to assess the risks in deciding whether to implement a limited examination policy' to 'The FSP should assess the risks when deciding to implement a limited examination policy'.	<b>Accept with modification:</b> Original statement stricken from section 4.3.5. Statement 'The FSP should assess the risks when deciding to implement a limited examination policy' added to new section 4.1
24	References	T, E	There are no references given to support the position that limited examinations should be conducted. This is supposed to be a science based document going through the process to become an ANSI approved national standard, that was drafted by a scientific organization under NIST. Why are the only references for terms? I could give a lot of references on this topic, but every reference would support the position that limited examinations should not be conducted. This is a scientific document, and the basis for including methods of limited examinations needs to be referenced to research that supports the position of the document.	Provide references, or refer back to OSAC for development of research.	<b>Reject:</b> This document does not state nor imply that performing limited examinations is best practice, nor does it take position on whether or not limited examinations should be performed. This document additionally does not describe a scientific process. Rather, this document identifies and sets forth the optimal way to carry out limited examinations, should an FSP choose to do so, by providing practical information and recommendations on issues such as preferred technical practices, optimal variations in procedures, and other similar issues related to limited examinations. Statements added to new section 4.1 to clarify this.

26	Bibliography		There is no bibliography to allow the reader to read the basis to support the position that limited examinations should be conducted. Why is there no bibliography in a scientific document? Other documents have them, why not this one?	Provide a bibliography that includes the research studies that support the positions in this document and justify limited examinations as being best practice. If there are no sources to justify this position, then it is not a science based standard, which is what OSAC and ASB are charged with developing. If this is the case, then the document needs to be sent back to OSAC for research. Otherwise, you are implementing a best practice recommendation with no basis for knowing that it is actually best practice.	<b>Reject:</b> This document does not state nor imply that performing limited examinations is best practice, nor does it take position on whether or not limited examinations should be performed. This document additionally does not describe a scientific process. Rather, this document identifies and sets forth the optimal way to carry out limited examinations, should an FSP choose to do so, by providing practical information and recommendations on issues such as preferred technical practices, optimal variations in procedures, and other similar issues related to limited examinations. Statements added to new section 4.1 to clarify this.
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