

Deadline of Submission of Comments: 25-Sep-23
Document Number: ASB Std 185
Document Title: Standard for Proficiency Testing in Friction Ridge Examination

#	Section	New Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
93	Overall		Technical	The document as written covers proficiency testing standards for a number of activities associated with friction ridge examinations. Several of these activities may be accomplished by personnel that are not actually competent friction ridge examiners (there are personnel that only process evidence, there are personnel that only capture friction ridge evidence, etc.). Also, some requirements listed are specifically to be applied to competent friction ridge examiners, and other requirements are to be applied to all FSP personnel. Is it the intention of this document to only be applicable to competent friction ridge examiners, or to all personnel that perform the listed activities in support of friction ridge examinations?	Please clarify if document requirements are applicable only to competent friction ridge examiners, or to all FSP personnel that perform the listed activities in support of friction ridge examinations	ACCEPT - Document has been updated to be inclusive of all personnel performing the activities listed within the document (not necessarily limited to friction ridge examiners)
1	Title, Scope, General		T	This document focuses on "Proficiency Testing" for means of Performance Monitoring. The opposite approach should be taken and focus on Performance Monitoring where proficiency testing is a sub set. This document could then have more valuable discussions for laboratories to participate in or create their own proficiency testing, Interlaboratory testing, and Intralaboratory testing without merging them all under the concept of PTs. These are distinct concepts within ISO/IEC 17025.	Consider building this document with a focus on Performance Monitoring Activities underwhich proficiency testing, interlaboratory testing, and intralaboratory testing are all components.	REJECT - Request is outside of the scope of the document. Other forms of Performance Monitoring have been or can be the subject of other documents.
21	3	N/A	E	Not sure why the NOTE is needed. The term assigned value is not used anywhere in the document. If the term was used it should be assigned a number, not put in as a note.	Remove the note.	ACCEPT - "Assigned value" no longer used in document
37	3	N/A	E	The Note directly underneath the section heading appears out of place ("NOTE The assigned value provides the basis for which participant results are expected to conform and performance is evaluated")	Delete the note or move it to its appropriate location	ACCEPT - "Assigned value" no longer used in document
45	3	N/A	T	Definition of "examiner (friction ridge)" to be added	Insert definition of "examiner (friction ridge) – (compare to trainee) An individual who has successfully completed their FSP's training program, and is authorized to conduct independent friction ridge examinations for the FSP by observing and interpreting data, making decisions, forming conclusions and opinions, issuing reports and/or providing testimony. Use of the term "examiner" in these documents refers to a "friction ridge examiner" and not a "trainee" refer to those definitions for further clarification.	REJECT - Document no longer refers to the "examiner" but to general FSP personnel performing associated job functions. As such the definition is not needed.
46	3	N/A	T	Unsure of the intent of including the floating note in reference to "assigned value" - Is this intended to be defined in this document ?	Delete note or add a definition for "assigned value" if required.	ACCEPT - "Assigned value" no longer used in document
43	3.1	N/A	T	Examiner (friction ridge) and competent friction ridge examiner definitions were duplicative and were resolved into one term. This definition deleted during 06/08/23 Full CB meeting	delete definition for competent friction ridge examiner	REJECT WITH MODIFICATION - Document no longer refers to the "examiner" but to general FSP personnel performing associated job functions. As such the definition is not needed.
2	3.1	3.9	T	Definition of proficiency testing should include "by means of interlaboratory comparisons" to match ISO/IEC 17043 definition.	Update definition to match ISO/IEC 17043. "Evaluation of participant performance against pre-established criteria by means of interlaboratory comparisons"	REJECT - The inclusion of "by means of interlaboratory comparisons" was rejected as this document specifically describes requirements for both interlaboratory (external) and intralaboratory (internal) developed proficiency tests
3	3.11 & 3.12	N/A	E	These two terms appear to be used interchangeably through out the document. 1) In reviewing the use of the term "test sample" it was found that the term "test specimen" could be easily replaced. 2)The use of the plural of test sample, creates the impression that there are multiple subsets of items within a test. Where as the plural of test specimens is what would be more expected to describe what is contained within a test. IS/IEC 17043 only defines a proficiency testing item and not a secondary concept of a subset of items.	1&2) Review use of terms "test sample" and "test specimen" determine if "test specimen" is more appropriate to be used throughout the document and remove the term "test sample". Or clarify the difference between these and use appropriately once definitions updated.	ACCEPT WITH MODIFICATION - Document made consistent for the use of "Test sample". Test Sample definition removed as it is not used outside of its general english meaning.
35	3.13	3.1	T	Currently says NOTE 1 Verification may be implemented in multiple ways including blind verification, open verification and consensus review. The general term verification is inclusive of these various types.	Should make clear that blind verification is best practice and that non-blind where used should be justified by an explanation as to why blind is not being used.	REJECT - The recommendation is too granular for a basic definition. Additional guidance on the use of blind verification is documented in BPR 144.

22	3.2	N/A	T	I am uncertain if the note regarding what is significant actually provides any additional clarification, especially given the definition of examination listed in 3.4.	Remove the note.	ACCEPT
44	3.2	3.1	T	The definition is not what is currently in TR016	Insert current definition per TR016 : "A discussion or interaction initiated by an examiner seeking guidance for the purpose of interpreting an image or comparison."	ACCEPT
47	3.3	3.2	T	Correct definition of corrective action to be used as per TR016.	Alter definition to read "corrective action - Action to eliminate or mitigate the cause of a non-conformity and to prevent recurrence. NOTE A corrective action is taken to prevent recurrence whereas preventive action is taken to prevent occurrence. ISO 9000:2015 (modified "or mitigate" added)"	ACCEPT
48	3.4	N/A	T	Delete definition for examination, was removed from TR016 as generic scientific term	Delete this definition	ACCEPT
49	3.5	3.3	E	Correct definition title to "forensic service provider"	Correct definition title to "forensic service provider"	ACCEPT
23	3.5	3.3	E	The definition of Forensic Service Provider (FSP) differs from the OSAC preferred terms.	Use the OSAC preferred term - "An organization or individual that provides forensic services." https://www.nist.gov/system/files/documents/2023/07/21/OSAC%20Preferred%20Terms_July%202023.pdf	REJECT - The Consensus Body discussed ISO and OSAC Preferred terms and the decision was made to use the ISO term for Forensic Service Provider.
50	3.6	3.4 & 3.5	T	Correct this definition to the version currently in TR016.	Alter definition to read: "friction ridge detail (synonym of friction ridge features) friction ridge features (synonym of friction ridge detail) The combination of ridge flow, ridge characteristics, and ridge structure of friction ridge skin, as reproduced and observed in an impression. The observed data used to compare and interpret similarity or dissimilarity between impressions.	ACCEPT WITH MODIFICATION - Definition was updated to the most current set of definitions appearing in TR 016.
51	3.7	3.6	T	Definition of ground truth not currently in TR016. If authors are happy with this definition needs to be added to TR016	Definition to be added to TR016: ground truth The actual or true state of affairs concerning the source or type of items submitted for evaluation.	ACCEPT WITH MODIFICATION - This term and definition have been updated to the most recent term and definition that appears in TR 016 for "ground truth"
52	3.9	3.8	T	No definition for participant exists in TR016. If this definition is required suggest adding it to TR016	Alter the definition of participant to be added to TR016: "participant: Forensic Service Provider(FSP) that receives proficiency test items and submits results for review by the proficiency test provider." Alter this definition to read: proficiency testing	REJECT - The scope and content of this document applies proficiency testing to both personnel and provider. The definition is appropriate as stated.
53	3.10	3.9	T	Correct this definition to the version currently in TR016.	Evaluation of participant performance against pre-established criteria by means of interlaboratory comparisons." OSAC Preferred Term	ACCEPT WITH MODIFICATION - This term and definition have been updated to the most recent term and definition that appears in TR 016 for "proficiency testing". This definition does not include "by means of interlaboratory comparisons".
54	3.11	N/A	T	This definition is not currently in TR016. Suggest using the definition for "sample" which is included in TR016	Alter definition to read: "sample Portion drawn from a whole or population for the purpose of examination/testing, not necessarily representative of the whole. NOTE This includes biological material taken from a person (e.g., hair blood, saliva)." ISO 21043-1	REJECT WITH MODIFICATION - Test Sample definition removed as it is not used outside of its general english meaning.
55	3.12	N/A	T	This definition is not currently in TR016. Suggest using the definition for "item" which is included in TR016	Alter definition to read: "item Object, substance or material that is collected, derived or sampled as part of the forensic process." ISO 21043-1	REJECT WITH MODIFICATION - Document made consistent for the use of "Test sample". Test Sample definition removed as it is not used outside of its general english meaning.
56	3.13	3.10	T	Correct this definition to the version currently in TR016.	Alter definition to read: "verification (phase of examination process) Independent examination by one or more examiners to ascertain if a decision, conclusion, or opinion is reproduced or is in conflict with the decision, conclusion, or opinion of another examiner. NOTE 1 Verification may be implemented in multiple ways including blind verification, open verification and consensus review. The general term verification is inclusive of these various types. NOTE 2 Verification is a quality assurance measure for friction ridge examination. NOTE 3 The use of the term "independent" indicates an autonomous examination but not necessarily one without knowledge of a prior decision, conclusion or opinion."	ACCEPT WITH MODIFICATION - This term and definition have been updated to the most recent term and definition that appears in TR 016 for "verification (phase of examination process)".
57	4.1		E	Replace "test" and "tests" with "proficiency test" throughout the entire document if this is what we are referring to.	Replace "test" with "proficiency test" Replace "tests" with "proficiency tests"	REJECT - Proficiency testing is in the title. It is obvious that 'test' refers to 'proficiency test'.
38	4.1.3	4.2	E	The number format appears to be off. Test Development should be a new section.	Renumber 4.1.3 to 4.2 and adjust all subsequent number formatting	ACCEPT

58	4.1.4	4.2.1	T	No definition for "performance" exists in this document. Suggest adding the OSAC Preferred Term "performance monitoring" if required.	Add the definition for "performance monitoring" to the document. "performance monitoring" The ongoing process of evaluating a forensic service provider's ability to perform work. Examples include quality control measures, observation, case review, retesting, blind testing, testimony monitoring, intra- or interlaboratory comparisons, and proficiency testing.	REJECT - The document is about 'proficiency testing', not 'monitoring'. Proficiency testing is only a part of 'performance monitoring'.
59	4.1.4a	4.2.1 a)	T	Definition of "friction ridge impression" to be added to the document.	Add the definition of friction ridge impression to the document. "friction ridge impression (synonym of impression) A reproduction of an area of friction ridge skin produced on a substrate by contact or transfer. Impressions may be referred to as exemplar impressions, latent impressions, or questioned impressions (refer to those definitions for further clarification)."	REJECT - Listing the definitions of every term is appropriate for the documents managing the detailed aspects. The use of impression throughout is unambiguous.
60	4.1.4c	4.2.1 c)	T	Definition of "enhancement" to be added to the document	Add definition from TR016: "enhancement Process to reveal, intensify, magnify, or clarify an observation or result." ISO 21043-1	REJECT - Listing the definitions of every term is appropriate for the documents managing the detailed aspects. The addition of "through digital processing" makes this term unambiguous.
27	4.1.4 d)	4.2.1 d)	T	This standard is related to friction ridge examination. Proficiency in "Recording exemplar impressions. " is not related to examination. Examining and determining the quality/usefulness of the exemplar impressions is related to friction ridge examination, but the task of recording the exemplars is not.	Remove 4.1.4 d)	REJECT - the outcome of recording exemplar impressions impacts the examination. It is a crucial part of the whole examination. This document is inclusive of all job activities associated with friction ridge examination.
61	4.1.4d	4.2.1 d)	T	Definition of "exemplar impressions" to be added to the document	Add definition from TR016: "exemplar impression (synonym of exemplar or known and exemplar prints) exemplar or known (synonym of exemplar impression and exemplar prints) exemplar prints (synonym of exemplar impression and exemplar or known) The deliberately recorded images or impressions from the friction ridge skin of an individual. NOTE Examples may include, but are not limited to, inked tenprints, inked palm prints, Livescan prints, powder and lift prints, casted/molded prints, or photographs of friction ridge skin."	REJECT - Listing the definitions of every term is appropriate for the documents managing the detailed aspects. Within the context of the document, this term is unambiguous.
62	4.1.4f	4.2.1 f)	T	Definition of "ABIS" to be added to the document	Add definition from TR016: "ABIS The acronym for Automated Biometric Identification System. A generic term for a computer-based system which is a primary repository of individuals' biometrics (such as fingerprints, palm prints, facial and/or iris images) and secondary repository of associated demographic data, equipped with functionality to process biometric searches, store and retrieve records for identification purposes."	ACCEPT WITH MODIFICATION - full term added before abbreviation. No definition was added,
28	4.1.4 f)	4.2.1 f)	E	An abbreviation used, ABIS, without prior definition.	Define ABIS	ACCEPT WITH MODIFICATION - full term added before abbreviation. No definition was added,
24	4.1.6	4.2.3	E	Comma needed between words 'tested' and 'test'	Insert necessary comma	ACCEPT
63	4.1.6	4.2.3	T	Definition of "substrate" to be added to the document	Add definition from TR016 "substrate Surface or material upon which a substance is deposited." ISO 21043-1	REJECT - Listing the definitions of every term is appropriate for the documents managing the detailed aspects. Within the context of the document, this term is unambiguous.
64	4.1.7	4.2.5	E	This sentence does not make sense. Reword to what was actually meant.	Suggested rewording "For internally developed proficiency tests, FSPs shall decide which conclusions are acceptable responses."	ACCEPT WITH MODIFICATION - 'in' between allowable and response deleted.
25	4.1.7	4.2.5	E	Extra 'in' present in the sentence.	Remove the 'in' between 'allowable' and 'response'.	ACCEPT
4	4.1.7	4.2.5	E	Sentence appears to have a typo. "shall decide which conclusions are included in the allowable <i>in</i> response choices."	Remove the last "in" making the sentence read: "Shall decide which conclusions are included in the allowable response choices."	ACCEPT
39	4.1.7	4.2.5	E	Extra "in" ("...are included in the allowable in response choices.")	Delete "in" between "allowable" and "response"	ACCEPT
5	4.1.7	4.2.5	T	1)There is currently a conclusions standard being worked on within the ASB, is the intention that this section be updated to encourage PTs to use the conclusions from that standard? 2) Why does this only apply to internally developed tests? Should there not be a desire to have the response choices within a PT standardized?	1) Depending on the timeline of the publication of the conclusion standard, reference that if possible prior to the publication of this document. 2)push for standardization of conclusions response choices.	REJECT - The allowable response choices depend on the FSPs internal decision which conclusion scale to apply.
29	4.1.8	4.2.6	E	The second sentence in this section is out of place. It addresses grading, not sample selection.	Make the second sentence a separate section.	REJECT WITH MODIFICATION - Second sentence of section was removed
6	4.1.8	4.2.6	T	The final sentence in this section: "Tests may be graded to ground truth only or to a combination of ground truth and criteria." 1) Should not be in the development section. 2)It is unknown what "criteria" is in reference to in this section.	1) discussions on evaluation should be in the Evaluation of performance section 4.4. The term "grading" should not be used. 2)how to establish and document the criteria for evaluation appears to be the purpose of section 4.4.	ACCEPT WITH MODIFICATION - Second sentence of section was removed

65	4.1.8	4.2.6	E	Reword the sentence to the requirement that shall be enforced, and the second sentence that may be followed.	Suggested rewording "Samples shall only include impressions for which the ground truth state is known. Responses may be compared solely to ground truth state, or to a combination of ground truth state and FSP accepted responses."	REJECT WITH MODIFICATION - Second sentence of section was removed
66	4.1.9	4.2.7	E	Reword the sentence to state clearly what the requirement is.	Suggested rewording "Accepted responses to proficiency tests shall be documented by the proficiency test creator, including expected documentation to support each response."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
7	4.1.9	4.2.7	T	This statement: 1)is repetitive from the concept of Ground Truth in 4.1.8 is stronger than the "expected response" and should be documented, 2) is misplaced in the section on test development. It should be with the section on evaluation of performance. 3) "Expected Responses" is more complex than the term represents. Suggest using "assigned value" from ISO/IEC 17043 defined as "value attributed to particular property or characteristic of a proficiency testing item." The term is further explored in the Annex B.3 where it describes the complexity of determining an assigned value for a PT.	1) Remove this section, add the concept of documentation to 4.1.8 (document how the item was made/sourced) 2)transfer concepts of this section to the evaluation of performance, and the development of the evaluation criteria. 3)Adopt the term "assigned value" from ISO/IEC 17043 to replace "expected responses" term.	REJECT - 1) It is not about being made/sourced, it is about the expected responses. 2) The expected results have to be defined before the test is distributed to participants. 3) document is consistent in the use of 'expected responses'.
8	4.1.10	4.2.8	T	encourage the adoption of "assigned value" instead of "expected response" following ISO/IEC 17043 document.	Change wording as follows: "Neither the ground truth nor assigned value for the test specimens shall be disclosed..."	REJECT - Document was made consistent for the use of "expected responses". Suggested wording is not considered a substantive improvement on current wording.
67	4.1.10	4.2.8	E	Reword the sentence to state clearly what the requirement is.	Suggested rewording: "Neither the ground truth state nor acceptable responses for proficiency tests shall be disclosed to participants until after the proficiency test is completed."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
9	4.2	4.3	T	Caution the use of the word "validation" as it is commonly used for the validation of methods or instruments which follow different processes to what is describe in this document.	Encourage reviewing the concept of Homogeneity and Stability evaluation described in ISO/IEC 17043 and focusing on providing all participants with the same materials under the same conditions. See Annex B.2	REJECT - 'Test validation' is explained in 4.3.2.
68	4.2.1	4.3.1	T	Add the definition for "validation" to the document.	Add definition from TR016: "validation A process of evaluating a system, method or component to determine that requirements for an intended use or application have been fulfilled." OSAC Preferred Term	REJECT - Listing the definitions of every term is appropriate for the documents managing the detailed aspects. Within the context of the document, this term is unambiguous.
10	4.2.2 b)	4.3.2 b)	T	1)The term "verification" is defined by this document as something quite different from its use in this section. 2)pre-distribution testing should not be a requirement especially for smaller interlaboratory tests or intralaboratory tests. Other methods of confirming homogeneity and stability can be successful. Such as using materials from known standards/reference sources.	1)Encourage reviewing the concept of Homogeneity and Stability evaluation described in ISO/IEC 17043 and focusing on providing all participants with the same materials under the same conditions. See Annex B.2 2)Review both assessment of homogeneity and stability in Annex B.2 and the determination of assigned value in Annex B.3	REJECT WITH MODIFICATION - The term verification was replaced with "Confirmation" to avoid confusion.
69	4.2.2b	4.3.2 b)	T	Add the definition for "verification (analytical) to the document	Add definition from TR016 : "verification (analytical) Performing subsequent testing to ascertain if the results are concordant." OSAC Preferred Term	REJECT - Verification replaced with "Confirmation" to avoid confusion.
70	4.2.2b	4.3.2 b)	E	Suggest rewording this requirement to state clearly what the requirement is.	Suggested rewording "Validation that the test can be completed using the materials supplied shall be conducted by pre-distribution verification of the proficiency test by participants independent of the test development process, and shall be conducted under the proposed testing conditions. Personnel participating in the pre-distribution verification of the proficiency test shall be friction ridge examiners. NOTE For tests developed or validated by the FSP, the personnel participating in the pre-distribution verification of the test may be internal or external to the FSP."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
30	4.2.2 b) c)	4.3.2 b) c)	E	This standard includes a definition of verification and the use of the term in these sections does not fit that definition.	Replace "verification" with "confirmation".	ACCEPT
71	4.2.2c	4.3.2 c)	E	Suggest rewording this requirement to state clearly what the requirement is.	Suggested rewording: "Validation that the pre-distribution verification proficiency test results correspond to the acceptable responses."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
11	4.2.2 c)	4.3.2 c)	T	1)The term "verification" is defined by this document as something quite different from its use in this section. 2)Term "Expected responses" should be changed to either Ground Truth, or Assigned Value.	1)Encourage reviewing the concept of Homogeneity and Stability evaluation described in ISO/IEC 17043 and focusing on providing all participants with the same materials under the same conditions. See Annex B.2 2)Review determination of assigned value in Annex B.3	REJECT - Verification replaced with "Confirmation" to avoid confusion. "Assigned Value" replaced with "Expected Responses" throughout document.
72	4.3.1	4.4.1	E	This section is open to interpretation as to what is "high risk" and what is "low risk." Not best practices for a Standard. Reword this section to clearly state what the requirement is.	Suggested rewording: "All FSP personnel shall participate in a proficiency test for the forensic job function(s) that the FSP considers highest risk annually. All FSP personnel shall additionally participate in a proficiency test for the forensic job function(s) that the FSP considers lower risk periodically."	ACCEPT WITH MODIFICATION - Requirement reworded with risk determination assigned to FSP.

31	4.3.1	4.4.1	T	This is outside the scope of this standard and "highest risk job function(s)" and "lower risk job function(s)".	Remove this section.	REJECT - Requirement reworded with risk determination assigned to FSP.
12	4.3.1	4.4.1	T	Section is vague. Additional information should be provided to define high vs. low risk job functions.	Provide information as to job functions which are considered high risk vs. low risk. Perhaps this can be added to section 4.1.4 where some job functions are listed. Providing context to why a job function is considered high risk vs. low risk will assist in consistent application of these requirements.	REJECT WITH MODIFICATION - Requirement reworded with risk determination assigned to FSP.
73	4.3.2	4.4.2	T	Reword this section to refer to our definition of friction ridge examiners.	Suggested rewording: "Proficiency tests shall only be administered to FSP personnel approved to perform independent casework, defined in this document as "friction ridge examiners" (refer to that definition)."	REJECT - Proficiency testing within the context of this document is not exclusively applicable to friction ridge examiners, but also includes personnel that perform job functions associated with friction ridge examination (e.g., detection, preservation, enhancement, recording, etc.)
74	4.3.3	4.4.3	E	Slight edit of wording suggested	Suggested rewording: "Proficiency Tests shall be administered in conditions reflecting actual FSP casework (such as environmental conditions, equipment provided, time constraints) and in accordance with applicable FSP policies and procedures"	REJECT - Suggested wording is not considered a substantive improvement on current wording.
26	4.3.4	4.4.4	E	Capital 'Shall' in 1st sentence.	Shall' should not be capitalized.	ACCEPT
40	4.3.4	4.4.4	E	"Shall" should be lower case	Change "Shall" to "shall"	ACCEPT
75	4.3.4	4.4.4	T	Don't agree with the intent of this wording. Proficiency test providers often stipulate what tools SHALL NOT be used by participants, such as searching the prints through the ABIS.	Suggested rewording: "The FSP shall decide which tools and resources individual examiners are allowed to utilize during proficiency test administration, unless prohibited by the proficiency test provider (for instance use of ABIS)."	ACCEPT WITH MODIFICATION - Exception for test provider prohibitions added.
13	4.3.5	4.4.5	T	Use of the term "expected results" should be standardized with other sections of the document and utilize the term assigned value.	Update sentence to "... that may hint at or guide them to the assigned value without direct examination of the test specimen."	REJECT - Document is consistent in the use of "expected responses". "Assigned value" no longer appears in the document.
32	4.3.5	4.4.5	E	This language is vague and adds no value this section. "—no matter how subtle—"	Remove "—no matter how subtle—"	ACCEPT
33	4.3.5	4.4.5	E	"Tests shall be administered such that participants are not exposed to cues—no matter how subtle—that may hint at or guide them to the expected results without direct examination of the test specimen." It is very difficult to remove all possible cues - especially subtle ones. The "shall" here is maybe too strong given the language used—they will not be able to ensure that the participants are not exposed to any cues.	"As much as possible, test administrators shall prepare and run the test such that participants are not exposed to cues—no matter how subtle—that may hint at or guide them to the expected results without direct examination of the test specimen." OR "Test administrators should prepare and run the test in such a way that participants are not exposed to cues—no matter how subtle—that may hint at or guide them to the expected results without direct examination of the test specimen." OR similar.	REJECT - Suggested wording is not considered a substantive improvement on current wording.
76	4.3.5	4.4.5	E		Suggested rewording: "Proficiency tests shall be administered such that participants are not exposed to cues—no matter how subtle—that may hint at, or guide them, to the acceptable results without direct examination of the proficiency test materials."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
77	4.3.6	4.4.6	T	What is the purpose of this requirement? You have included all possible options of testing. It will either be conducted blind or non-blind.	Suggest deleting the requirement	REJECT WITH MODIFICATION - "shall" replaced with the permissive "can"
36	4.3.6	4.4.6	T	Testing should be blind. At the very least the standard should require labs to provide written justification for why blind testing is not possible.	Don't allow non-blind testing.	REJECT - The execution of blind proficiency testing is non-trivial and may be impracticable within any given FSP (particularly when employing a third party vendor for proficiency testing). The choice of format will be left to the FSP.
34	4.3.6	4.4.6	E	This section currently reads "Tests shall be administered in one of two formats: a) Non-blind testing...b) Blind testing...". This language suggests that these are equally effective options as there is no recommendation about which is preferred or better. The HFTG strongly believes that more blind testing would be immensely beneficial to forensic science—an endorsement from the friction ridge subcommittee would help encourage their community to embrace blind testing protocols.	Either: "Tests shall be administered in one of two formats: a) Non-blind testing...b) Blind testing... NOTE. Proficiency demonstrated in tests using blind testing protocols has two key benefits. Blind testing helps to limit the effect of cues, as described in 4.3.5, and provides greater assurances that the forensic technique is valid and reliable." OR "Tests should be administered using a blind testing protocol (i.e., participants are not aware that they are being tested) as much as practical. When resource constraints do not permit blind testing, tests can also be administered non-blind (i.e., participants are aware they are being tested)." OR similar.	REJECT - The execution of blind proficiency testing is non-trivial and may be impracticable within any given FSP (particularly when employing a third party vendor for proficiency testing). The choice of format will be left to the FSP.

14	4.3.6 a)	4.4.6 a)	T	The term concept of "non-blind" testing is used in various ways within FS. Open (ASB Footwear PT standard), Informed (ASB Bloodstain PT standard), non-blind, etc. It needs to be clear that they know they are being tested, but do not know the assigned values for the materials they are examining. ISO/IEC 17043 does not define blind testing, but discusses it in A.2.4 a PT is not inherently expected to be Blind. Therefore naming the opposite is difficult. Note 1 of section 3.13 describes verification in terms of blind or open.	Suggest reviewing terminology in other ASB PT standards for consistency.	REJECT - The terms "Non-blind" and "Blind" are specifically defined within the document subsections a) & b) to be solely related to the awareness of being tested.
78	4.4	4.5	E	Suggest re-titling this section to be "Performance Monitoring" which is defined in the document and in TR016	Re-title this section: "4.4 Performance Monitoring"	REJECT - Title is appropriate to the content of the section and provided definition of proficiency testing
79	4.4.1	4.5.1	T	Poorly worded section. Break the section up to include the two requirements separately and the "should" recommendations can sit in a separate section altogether.	Suggested rewording: "4.4.1 - Prior to test administration the FSP shall have documented criteria for evaluating acceptable performance for individual participants. 4.4.2 Prior to test administration the FSP shall have documented criteria for evaluating acceptable performance for the overall FSP quality management system (ie the laboratory as an entity that may include other additional quality assurance measures rather than one participants individual responses). 4.4.3 - Recommended quality assurance measures should address: a) Individual participants responses compared to the FSP acceptable responses. b) Specifics about which conflicting responses are acceptable to the FSP (For example - a missed source identification is allowed but an erroneous source identification is not), c) Expected documentation of observed data to support the participant's results (where documentation is required), d) To what extent the test administration mirrors FSP policies and procedures for actual casework conditions	REJECT - Suggested wording is not considered a substantive improvement on current wording.
80	4.4.1	4.5.1	T	Add the definition of "conflict" to the document	Suggest adding the definition of conflict from TR016 to the document: conflict A condition in which two or more examiners disagree on a suitability decision or source conclusion."	REJECT - The term "conflict" is not used within the requirements or recommendations of this document.
81	4.4.1	4.5.1	T	If this note is supposed to be relevant or binding then suggest we add it as a recommendation rather than a note.	Suggest adding Section "4.4.4 - Performance of individual FSP personnel should be evaluated based on their individual results, prior to the application of any additional quality assurance measures involving other participants, such as consultation, verification or reviews. Performance of the overall FSP quality management system should be evaluated based on the overall results for the organization, produced after the application of quality assurance measures such as consultation, verification, or reviews.	ACCEPT WITH MODIFICATION - Note statement was added as two additional requirements to document.
82	4.4.1	4.5.1	T	Add the definition of "quality assurance measures" to the document	Add definition from TR016: "quality assurance measures Steps taken by an FSP to detect, correct, minimize and/or prevent non conforming work. NOTE This may include, but is not limited to, root cause analysis, additional verification, non-conformity assessment, audits and corrective and/or preventive actions."	REJECT - The specific term "quality assurance measures" is not used within the requirements or recommendations of this document. The term "quality controls" is used only within the note and examples are provided for sufficient clarity of its use.
15	4.4.1 a)	4.5.1 a)	T	"Expected Responses" is more complex than the term represents. Suggest using "assigned value" from ISO/IEC 17043 defined as "value attributed to a particular property or characteristic of a proficiency testing item." The term is further explored in the Annex B.3 where it describes the complexity of determining an assigned value for a PT.	Adopt the term "assigned value" from ISO/IEC 17043 to replace "expected responses" term.	REJECT - Per Section 4.2.7, "expected responses" to tests will be documented including the criteria for reaching each response. This provides sufficient clarity in application.
16	4.4.1 b)	4.5.1 b)	T	"Expected Responses" is more complex than the term represents. Suggest using "assigned value" from ISO/IEC 17043 defined as "value attributed to a particular property or characteristic of a proficiency testing item." The term is further explored in the Annex B.3 where it describes the complexity of determining an assigned value for a PT.	Adopt the term "assigned value" from ISO/IEC 17043 to replace "expected responses" term.	REJECT - Per Section 4.2.7, "expected responses" to tests will be documented including the criteria for reaching each response. This provides sufficient clarity in application.

83	4.4.2	4.5.4	T	Suggest rewording of this requirement to use already clearly defined terms.	Suggested rewording: "The FSP shall have a written policy regarding quality assurance measures required when a proficiency test result is in conflict with expected or FSP accepted results (e.g., actions such as root cause analysis, audits, corrective action, preventative action etc.)"	REJECT - Suggested wording is not considered a substantive improvement on current wording.
17	4.4.2	4.5.4	T	"Expected Responses" is more complex than the term represents. Suggest using "assigned value" from ISO/IEC 17043 defined as "value attributed to a particular property or characteristic of a proficiency testing item." The term is further explored in the Annex B.3 where it describes the complexity of determining an assigned value for a PT.	Adopt the term "assigned value" from ISO/IEC 17043 to replace "expected responses" term.	REJECT - Per Section 4.2.7, "expected responses" to tests will be documented including the criteria for reaching each response. This provides sufficient clarity in application.
41	4.4.2	4.5.4	E	No need for "etc." in an "e.g."	Delete "etc." from example list	REJECT - Noted. Inclusion does not impact readability of document.
84	4.5	4.6	T	Suggest rename title to "Proficiency Test Record Keeping" or "Proficiency Test Documentation"	Suggest renaming title of section to "Proficiency Test Record Keeping"	REJECT WITH MODIFICATION - Title shortened to "Documentation"
85	4.5.1	4.6.2 & 4.6.3	T	Suggest breaking this section up into two requirements. 4.5.1 and 4.5.2	Suggested re-wording: "4.5.1 - The FSP shall have documentation that is sufficient to enable a stakeholder or third party organization to audit the proficiency testing process and results." Add definition from TR16 "stakeholder (interested party) A person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity." ISO 9000:2015	ACCEPT WITH MODIFICATION - Section broken up into 4.6.2 and 4.6.3. Sections reworded.
86	4.5.1	4.6.2	T	Add the definition of "stakeholder" to the document	A person or organization that can affect, be affected by, or perceive itself to be affected by a decision or activity." ISO 9000:2015	REJECT - The specific term "stakeholder" is not used within the requirements or recommendations of this document.
87	4.5.1	4.6.2 & 4.6.3	T	Suggest breaking this section up into two requirements. 4.5.1 and 4.5.2	Suggested re-wording: "4.5.2 - At a minimum the FSP shall document the following as part of their Proficiency Test Record Keeping:"	ACCEPT WITH MODIFICATION - Section broken up into 4.6.2 and 4.6.3. Sections reworded.
42	4.5.1a	4.6.3 d)	E	Need a space "individual(s)responsible"	Add space after "individual(s)"	ACCEPT
18	4.5.1 e) f) g)	4.6.3 h)	T	The noted sections may 1) not be applicable to all types of PTs described within this document 2) be difficult for an FSP to acquire from an external source.	1) move these under a document subset that allows for an "as applicable" qualification. 2)that same subset should have a statement regarding internal vs. external requirements.	ACCEPT WITH MODIFICATION - Original subsections e), f), & g) were deleted and replaced by new subsection h) which requires documentation of the FSP's evaluation of the representativeness of the administered proficiency test.
19	4.5.1 h)	4.6.3 i)	T	"Expected Responses" is more complex than the term represents. Suggest using "assigned value" from ISO/IEC 17043 defined as "value attributed to a particular property or characteristic of a proficiency testing item." The term is further explored in the Annex B.3 where it describes the complexity of determining an assigned value for a PT.	Adopt the term "assigned value" from ISO/IEC 17043 to replace "expected responses" term.	REJECT - Per Section 4.2.7, "expected responses" to tests will be documented including the criteria for reaching each response. This provides sufficient clarity in application.
94	4.5.1K	4.6.3 l)	Technical	This requirement seems a little excessive if the conditions of the test match regular case work	Update requirement to "Conditions not typical of normal case work under which the test was administered to the participants (e.g. environmental conditions, equipment, time constraints)"	ACCEPT
20	4.5.1 n) o)	4.6.3 o) p)	T	Section 4.4.1 discusses both Individual FSP personnel performance and overall FSP quality system performance. These two sections on documentation only focus on the Individual FSP personnel performance.	Change section to include the documentation requirements for both the Individual FSP personnel AND the overall FSP quality system.	ACCEPT
88	4.5.2a	4.6.3 d)	T	Suggested rewording of this section as 4.5.2a	Suggested rewording: "a) The identity of the individual(s)responsible for the selection, validation, administration, and evaluation of proficiency tests within the FSP."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
89	4.5.2b	4.6.3 e)	T	Suggested rewording of this section as 4.5.2b	Suggested rewording: " b) The source of the proficiency test (for proficiency tests obtained from external sources) or identity of the personnel responsible for developing the proficiency test along with their qualifications (for proficiency tests developed internally)."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
90	4.5.2c	4.6.3 f)	T	Suggested rewording of this section as 4.5.2c	Suggested rewording: " c) The forensic job function(s) being tested."	REJECT - Suggested wording is not considered a substantive improvement on current wording.
91	4.5.2d	4.6.3 g)	T	Suggested rewording of this section as 4.5.2d	Suggested rewording: "d) Documentation that the proficiency test has been developed and validated in accordance with the requirements set forth in this document, specifically each requirement listed above."	ACCEPT WITH MODIFICATION - Section reworded.
95	Annex A		Editorial	Document should not reference the working group. See proposed resolution for alternate wording with additional grammatical suggestions.	Update annex to read ... "This annex is not meant to provide an all-inclusive list. It is recognized that other publications on this subject may exist. At the time this standard was drafted, these publications were available for reference. Additionally, any mention of a particular software tool or vendor as part of this bibliography is purely coincidental and does not imply endorsement."	ACCEPT

92	Ballot comment		E	Document needs to clarify whether it is applicable only to competent friction ridge examiners or to all FSP personnel performing the listed activities in support of friction ridge examinations. (see attached comments)		ACCEPT
96	Ballot comment		E	<p>The latest revision of the document conspicuously removed key elements from the initial draft that are important for the design of proficiency testing. For example, one important clause that is removed is the requirement for the extent to which test samples are representative of casework be measured and documented. Another concern is the removal of the requirements related to "acceptable result" and "assigned value." Another is the allowance of flexibility for tests to be graded based on ground truth only or a combination of ground truth and criteria in Section 4.1.8 -- such flexibility does not help to standardize practices; further, it conflates issues of acceptable performance as it relates to measures of method performance versus assessments of method conformance. Even more, why are requirements about grading under Test Development section? Shouldn't that be under the Evaluation section? Finally, why alter the definition of proficiency testing from what has been established by ISO standards? As written, I would not approve the document, primarily because it omits key requirements that has caused the greatest concern in friction ridge previously about the credibility of existing proficiency tests. P.S. Why is there a "Note" related to a definition that was removed under the terms and definitions section? A lot of time was spent on ensuring the base draft provided was internally coherent and addressed important aspects of proficiency testing that have been at issue for many years. This draft has scaled that back and, as written, does not substantively move the community forward toward greater rigor around proficiency testing.</p>	<p>1 - Extent to which test samples are representative of case work documented</p> <p>2 - Requirements related to "acceptable result" and "assigned value"</p> <p>3 - Allowance of flexibility for tests to be graded based on ground truth only or a combination (addition)</p> <p>4 - Requirements under Test Development section? (under Evaluation?)</p> <p>5 - Why alter definition of proficiency testing from ISO?</p> <p>6 - Persistence of Note from "assigned value"</p>	<p>1 - ACCEPT WITH MODIFICATION - A single established means of measurement for the discipline has not been identified at this time. In lieu, the following additional requirements have been added: Test developers must assess and document the range of test samples offered, FSPs must determine and document the characteristics representative of normal casework, FSPs must determine and document the minimum requirements for representation in a proficiency test, FSPs must select proficiency tests based on these minimum requirements, and FSPs shall evaluate the selected test's representativeness.</p> <p>2 - REJECT - Per Section 4.2.7, "expected responses" to tests will be documented including the criteria for reaching each response. Document made consistent for the use of "expected responses".</p> <p>3 - ACCEPT - Second sentence of original section 4.1.8 removed</p> <p>4 - (see 3 above)</p> <p>5 - REJECT - Proficiency document describes development and administration of intralaboratory proficiency tests. This is in conflict with the current ISO definition.</p> <p>6 - ACCEPT - Note Removed</p>