

Deadline of Submission of Comments: 16-Feb-24

Document Number: ANSI/ASB Std 188

Document Title: Standard for Processing Evidence for the Detection of Friction Ridge Impressions

Comment #	Text Line # (s)	Document Section	Type of Comment	Current Document Wording	Proposed Revision	Revision Justification	For Working Group and Consensus Body use only, not to be completed by commenter.
			E-Editorial T-Technical				Final Resolution
1		Entirety	T	(none)	Add something under section 4 that allows for additional processing techniques to be added after the recommended sequences of this document, if the FSP so chooses.	Current content of document does not address if FSPs are allowed to add techniques after the recommended sequences. Section 4.2.1 allows for some of the recommended techniques to be interchangeable with others. But what I mean is the idea of continuing a sequence BEYOND what is recommended in the doc. For example, if someone wants to add VMD after the recommended sequence for a non-porous item. I know it seems nuanced. But I could see some attorney making an argument that the examiner wasn't allowed to do MORE simply because the doc didn't specifically allow for it.	Reject. 4.2.1 already addresses that an FSP "may supplement and/or deviate from the sequences". This document is intended to describe the "minimum processing sequences" for each type of evidence.
2		3.2	T	A forensic science entity or forensic science practitioner providing forensic science services.	Organization or individual that conducts and/or supplies forensic services. <i>ISO 21043-1</i>	Current document wording for this definition does not match the definition in TR016. Recommend matching TR016. Proposed revision is the TR016 language for the definition of this term.	Accept. Changed definition to match TR016.
24		3.3	E	Transfer medium (e.g., grease/oil, sweat, blood)	Add a period at the end.	All other sentences and sub-bullets in the document end with a period.	Accept. Period added.
3		3.5	E	...which may be visualized for examination and to maximize...	...which may be visualized for examination, and to maximize...	Length of current run-on sentence adds confusion, recommend adding a comma between "examination" and "and."	Accept. Comma added.
4		3.6	T	Type of surface (e.g., porous, non-porous)	Surface or material upon which a substance is deposited. <i>ISO 21043-1</i>	Current document wording for this definition does not match the definition in TR016. Recommend matching TR016. Proposed revision is the TR016 language for the definition of this term. If language is left as-is, the sentence needs a period at the end.	Accept with modification. Definition changed to TR016, but (e.g) examples were included. And a period was added.
25		3.6	E	Type of surface (e.g., porous, non-porous)	Add a period at the end.	All other sentences and sub-bullets in the document end with a period.	Accept. Period added.
27		4.1	T	I do not agree that processes should be those that are "available" to an FSP. If an agency only has black powder, and processes guns or paper with it, they will get poor results and possibly destroy LP evidence.	I think minimum processes should be stated (cyanoacrylate or ninhydrin), and if an FSP doesn't have that process available then they shouldn't be processing evidence.		Reject. In this document, we are stating the recommended minimum processing sequences for each type of evidence. 5.2 and 5.3 state the recommended minimum processing for non-porous and porous processing sequences.
5		4.1	T	The processes applied by each FSP shall be based on the efficiency and limitations of the process, availability of resources and processing techniques, and the type and condition of the evidence.	Recommend adding that the processes applied by each FSP shall also include the suspected matrix of the friction ridge impressions.	All aspects of current language are valuable and applicable. Some techniques are also chosen based on matrix, though. Such as amido black being used for impressions made in suspected blood. Or sudan black for grease/food stuffs. And I don't believe this is covered by the phrase "type and condition of evidence," as that speaks more to the materials the item is made out of or its surface condition.	Reject. As a standard document, we are stating the recommended minimum processing techniques. In addition, 4.1 states "type and condition of the evidence" and 5.1 states "particular substrate and matrix combination". This is meant to clarify that if an FSP needs to accommodate processing based on the item or it's condition, that needs to be documented.
15		4.2	E and T	The document mentions the sequence is from the least destructive to the most destructive.	Is destructive the best choice of word in this section? In some situations using a technique out of sequence causes irreparable damage. This is not always the case, though. For non-porous items applying powder before glue would not be destructive. In fact, the Home Office sequence typically has powders being applied before glue. An item could be treated with the dye stain an additional time after powder should there be a need to revisualize an impression. I don't have a great recommendation for a word to replace destructive but maybe adverse, negative, or detrimental. Or, wording could be added to the effect that sequence are created to minimize the damage caused by each processing technique.		Reject. Destructive is commonly used to refer to damage from processing. The recommended words are all synonyms for the word destructive.
18		4.2	E	We think that there is a typo - where the word "efficiency" appears. We believe the intended word is "efficacy" (as appears in 4.2.1).	Replace "efficiency" with "efficacy".		Accept.

19		4.2	T	Although this already had a lot of great recommendations concerning documentation, we wonder if there should be language that says something along the lines of "before proceeding to a more destructive step, a photo or other visual recording method should be obtain of the current state of the evidence".	Add something along the lines of "before proceeding to a more destructive step, a photo or other visual recording method should be obtain of the current state of the evidence".		Reject with modification - 4.4 reworded to "The FSP shall preserve potentially suitable friction ridge impressions prior to applying the next processing techniques within the processing sequence." 4.4 already prescribes a requirement to preserve any potentially suitable friction ridge impressions prior to the next sequence.
21		4.2	T	The FSP shall apply processing techniques in the sequences (i.e., sequential processing) prescribed in this document, from least destructive to most destructive, for the detection of friction ridge impressions.	The phrase "prescribed in this document" should be deleted from this sentence. Change sentence to "The FSP shall apply processing techniques in the sequences (i.e., sequential processing) from least destructive to most destructive for the detection of friction ridge impressions."	This sentence seems too restrictive. What techniques are you prescribing? The recommended techniques in 5.2 to 5.6? This document should not be requiring certain sequences as a standard. Processing techniques are not absolute. This should be left to the FSP. I agree with the statement from least destructive to most destructive but prescribing sequencing techniques is a step too far.	Accept
14		4.2.1	T	The first example of situations where the FSP may deviate from the sequence says that thermal paper does not react to a processing technique as expected.	Over the years thermal paper has been shown to have adverse reactions (darkening) to the traditional pororus processing sequence. I would not say that it does not react to those techniques as expected. The opposite is happening, it is reacting how we expect. Because of this I would recommend adding a sequence in section 5 for thermal paper. I realize that we cannot add a sequence for every surface type in section 5 but thermal papers are encountered enough and their sequence is different enough from porous that having a sequence listed in section 5 is warranted.		Reject with modification. Sentences added in 5.1 General. Sections 4.2.1 and 4.3 c) mention thermal paper and that processing can potentially have a negative impact on the item. Due to this document is a standard, and multiple potential sequences for thermal paper, it would not be possible to detail all those possibilities in this document. It would be better suited for a possible future BPR.
29		4.2.1	Cyanoacrylate Dye Stains	The item does not react to a processing technique as expected (i.e., dry plastic vs soft plastic, thermal paper).	1st, I think this should be "e.g." not "i.e.". Listing materials does not give us examples of how or what processing techniques are not working as expected. What about "thermal paper", exactly? Thermal Ninhydrin turning thermal paper black is an "e.g." of an unexpected result of a technique that should have worked. Unexpected background staining of a plastic processed with Aqueous Leucocrystal Viloet is another "e.g.". "Dry plastic v. soft plastic" is neither an i.e. or e.g. of an item not reacting to a processing technique as expected.	the examples in parenthesis doesn't seem to match with the discussion of the bullet	Accept. 4.2.1 changed to e.g. Removed dry plastic vs soft plastic.
6		4.2.1	T	"The FSP may supplement and/or..."	If the "may" statements do indeed need to be proceeded by a "shall" statement to adhere to ASB style guidelines... Consider taking the second sentence of 4.2 ("A visual examination shall be completed following every processing technique in every sequence") and separating it out into its own section number (such as 4.3). It seems a separate thought from the first sentence of 4.2 anyway, and would be fine as an independent section. Then move the current 4.2.1 up and add it to the end of the modified 4.2. So 4.2 would contain a total of 3 sentences - "The FSP shall apply processing techniques in the sequences....The FSP may supplement and/or deviate...Some examples of when the FSP may supplement and/or deviate..." This would enable the two "may" sentences of current 4.2.1 to follow the "shall" statement of 4.2, adhering to guidelines. Current sections 4.2 and 4.2.1 are related enough I don't think this would be a problem.	I never feel entirely clear on the rules, but is this section allowed to consist only of two "may" statements and no "shall" statement when the doc type is a standard?	Accept with modification, 4.2.2 was moved to the beginning of 4.2.1 (deleted 4.2.2), added the word "processing"
22		4.2.2	T	The FSP shall document deviations from the sequences.	This statement should be changed from "shall" to "should". Example: The FSP should document deviations from the sequences.	This is onerous and unnecessary documentation. If we process a white piece of paper, we are not going to waste our time with a light source. We will go to an amino acid technique. This does not need to be documented every time. We document our processes in sequence so that another competent examiner can evaluate and reproduce what was done. Documenting deviations is a recommendation not a requirement and should be left to the FSP.	Reject with modification. If an FSP adopts this standard and deviates from the processing sequences as written, they must document the deviation. Documenting the deviation from the standard sequence can be very simple, and not meant to be cumbersome. (Section moved to 4.2.1)

28		4.3	T	4.3 says they should assess negative implication.	Add a requirement that customers shall be notified of significant negative implications prior to processing, and this communication shall be documented.		Accept. Statements added to 4.3.
30		4.3	E	Cyanoacrylate Dye Stains	Cyanoacrylate dye stains	doesn't need all caps of 1st words	Accept
31		4.3	E	Porous Chemical Processing	Porous chemical processing	doesn't need all caps of 1st words	Accept
9		4.4	T	The FSP shall preserve detected friction ridge impressions prior to applying the next processing techniques...	The FSP shall preserve <u>potentially suitable</u> friction ridge impressions prior to applying the next processing techniques...	Currently, it reads as if ALL friction ridge impressions shall be preserved regardless of the potential for utility.	Accept.
13		4.4	T	The document says that prior to the next process step the FSP shall preserve the impression.	I recommend softening this a little. In the majority of situations, yes, impressions must be preserved before moving to the next step. However, after glue and before dye stain on non-porous items I would push back and say it is not required to be done as the dye stain only stains the already applied glue and does not react with the friction ridge residue. I think preserving the impression after glue is a best practice recommendation but when several impressions have been developed on an item not preserving every one after glue is not needed as they will likely get better after dye stain and the chance of those impressions getting worse or not visible is very low.		Accept - 4.4 reworded to "The FSP shall preserve potentially suitable friction ridge impressions prior to applying the next processing techniques within the processing sequence."
7		4.4	T	The FSP shall preserve detected friction ridge impressions prior to applying the next processing techniques within the processing sequence.	Reword to "The FSP shall preserve detected friction ridge impressions that appear possibly suitable for comparison purposes, prior to applying the next techniques within the processing sequence." (or similar). This doesn't commit anyone to declaring impressions were suitable. Just "possibly suitable." Perhaps add a second sentence of "Detected friction ridge impressions that are obviously not suitable for for comparison purposes do not need to be preserved." Plenty of experts and non-experts, such as sworn or crime scene personnel, are trained on how to make this decision in the field.	Current wording implies EVERY single impression must be preserved, even in instances where it is obvious it won't be suitable for any sort of comparison. This is not a common practice in laboratory settings. But additionally, since the scope of this document does not apply only to laboratory settings this would extend out to require everyone in the field, such as sworn officers powdering a residential burg or other crime scene response teams at scenes, to lift/preserve literally everything. Even when it's just one ridge. I'm concerned the requirement would result in officers, etc., not fingerprint processing in the field. Additionally this would create unnecessary extra work for the examiners who evaluate impressions for suitability with so many extra lifts/photos/etc.	Accept. Wording changed to "potentially suitable" friction ridge impressions.
20		4.4	T	The standard instructs examiners to preserve detected FP impression before moving to the next step but, if at one step an FP impression is not detected, there should still be a record before moving on to another step that might reveal the impression.	The subcommittee might consider adding language recommending the preservation of evidence even if an impression is not revealed prior to moving on to more destructive methods.		Reject with modification. 4.4 reworded to "The FSP shall preserve potentially suitable friction ridge impressions prior to applying the next processing techniques within the processing sequence."
23		4.4	T	The FSP shall preserve detected friction ridge impressions prior to applying the next processing techniques within the processing sequence.	The FSP shall preserve detected friction ridge impressions with observable data and potential utility prior to applying the next processing techniques within the processing sequence. OR. The FSP shall preserve detected friction ridge impressions of potential value for comparison and/or identification prior to applying the next processing techniques within the processing sequence. OR. Change "shall" to "should" in this sentence.	This statement is too broad and unclear on what needs to be preserved which puts unnecessary burden on the FSP. We will not preserve every detected friction ridge impression. This is because not every impression has observable data or potential utility. Preserving every detected friction ridge impression is onerous and unnecessary. Please be more specific in the type of friction ridge impression that is required to be preserved.	Accept. Wording changed to "potentially suitable" friction ridge impressions.
16		4.4	T	Section on preserving FR impressions	consider adding an example (e.g photography)	Clarity	Accept with modification. 4.4 clarification added. Sentence added "The appropriate method for digital capture of the friction ridge impressions is up to the FSP."
17		5	T		Should iodine fuming be included in the document?	Non-destructive method that could be used on porous or non-porous surfaces	Reject with modification. Sentences added in 5.1 General. At this time, iodine fuming is a very specific process that would be better suited for a BPR document. Iodine fuming is not a common chemical process in the discipline, only used in very specific instances.

8		5.1	T	NOTE Guidance related to application, formulation, and optimization of specific processing techniques can be found in the UK Home Office Fingerprint Source Book.	Add other resources to the note, or change the note to say "...can be found in the publications listed in the appendix of this document." Since the appendix already lists various resources where they could find this information.	The UK Home Office book is an excellent resource. I'm curious if there is a reason we are pointing people towards this book and not other resources, though? Such as NIJ's Fingerprint Sourcebook (chapter 7) or the Chesapeake Bay Division's online reagent program? Seems if we are going to guide them towards one publication, we shouldn't exclude others of equal value.	Accept. Note sentence modified as suggested.
26		5.1	E	prior to processing and then can proceed	Change to "prior to processing and then processing can proceed".	As written, it sounds like "wet items" is the subject, and they are proceeding somewhere after drying.	Accept with modification. 5.1 divided sentence into 2 parts. Added "processing of the items" to the second sentence for clarity.
11		5.3c	T	The recommended amino acid reagent is indane and then says if not practical use another amido acid reagent.	Remove the recommendation of indane for 5.3c and just have the recommendation be amino acid reagent. While I agree for certain surfaces indane has been shown to produce better results than DFO or nin, but for the purposes of this document it is enough to just say amino acid reagent and let the FSP decide which amino acid reagent they would like to use. DFO and nin are viable, effective options for developing friction ridge impressions and to relegate them to use when indane is not practical does not do them justice.		Reject with modification. Sentence changed in 5.3 porous and 5.4 semi-porous to reflect recommending Indane/NIN or alternatively DFO/NIN. We list amino acid reagents and give 2 different acceptable choices. Additionally, we already state that in 4.1 "availability of resources and processing techniques" allows for FSP's to modify based on what is available to them.
10		5.4, d	T	Magnetic Powder.	<u>Powder or</u> Magnetic Powder.	Powder can be/has been successful on semi-porous surfaces.	Reject with modification. Sentence added under 5.4 d) to allow for regular powder usage if a fluorescent amino acid reagent is not going to be used.
12		5.4e	T	Same comment as 5.3c	Same comment as 5.3c		Reject with modification. Sentence changed in 5.3 porous and 5.4 semi-porous to reflect recommending Indane/NIN or alternatively DFO/NIN. We list amino acid reagents and give 2 different acceptable choices. Additionally, we already state that in 4.1 "availability of resources and processing techniques" allows for FSP's to modify based on what is available to them.