

Deadline of Submission of Comments: 19-Jan-26

Document Number: ASB Std 234

Document Title: Standard for Qualifications for Forensic Anthropology Practitioners

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	n/a	Foreword	E	ASTM 2917-24	ASTM E2917-24a	this number doesn't exist (must include the "E"); also ASTM E2917-24a replaced ASTM E2917-24	Accept
2	3-4	Scope	E	This standard provides the minimum qualifications and requirements for forensic anthropology practitioners, including education, training, experience, certification, ethics, and professionalism	Either: "This standard provides the preferred qualifications and requirements..." if section 4.4 is not modified, OR the present wording can stay "This standard provides the minimum qualifications and requirements..." IF section 4.4 is modified to remove the shall for certification	As it stands in this draft, I believe the proposed standard is well beyond the minimum qualifications, particularly section 4.4. Either section 4.4 needs to be reworded/modified, or this scope needs to be changed to remove the word 'minimum,' since the requirement for certification goes well beyond many job requirements in the field. Historically many jobs in the field had a minimum requirement of an MA with a preferred qualification of a PhD. And there are still many jobs in the field with similar requirements (e.g., positions with SNA in support of DPAA, many Medical Examiner positions). Considering later this year (2026) will be the first year that those with a terminal MA can sit for the ABFA multilevel certification, it logically follows that no current practitioners with an MA have certification at present. As such, this proposed standard goes well beyond the minimum qualifications and is instead demonstrative of where some individuals in the field <i>want</i> to see the field headed but we simply aren't there yet. To say this proposed standard sets out minimum qualifications and then expects something that has not yet been obtainable for large swaths of practitioners is logically inconsistent.	Reject - the working group established consensus regarding the requirement (shall) of obtaining certification as a minimum discipline standard. The multi-tier certification has expanded access, and although the Analyst exam has not taken place, the phrase "when eligible" accommodates the time delay. This is a stand-alone document and is not dependent on job descriptions or requirements. See resolutions for comment #11-12 for clarification on the degree requirement. Additional information, if needed: the 2009 NAS Report recommended a national code of ethics for all forensic science disciplines. The National Commission on Forensic Science published "The National Code of Professional Responsibility for Forensic Science and Forensic Medicine Service Providers" in 2016. The code states that forensic practitioners must meet a set of requirements including "Foster and pursue professional competency through such activities as training, proficiency testing, certification, and presentation and publication of research findings." Ten years later, Forensic Anthropology is standardizing certification as a requirement that demonstrates professional responsibility.
3	6	2	E	"The following reference is indispensable for the application of the standard."	Remove this sentence.	The provide sentence is an abbreviated description of the definition of a normative reference directly under the heading "normative reference." Is this done in any other Anthro document?	Reject - sentence required by ASB
4	6	2	E	"For dated references, only the edition cited applies. For undated references, the latest edition of the referenced document (including any amendments) applies."	Is ASTM Standard E2917-24a (the only normative reference) dated or undated? Can one of the two options be removed for clarity? (i.e., either remove "for dated..." OR "for undated" as appropriate)	There is only one reference, but two options for interpreting what editions apply. It is confusing.	Accept- date was added
5	Multiple	3	E	Definitions of terms are not in sentence structure.	Capitalize first letter of first word in definition and end each definition with a period.	This would match ASB Standard 225 (draft).	Accept
6	39	3.7	T	"medicolegal death investigation authority"	Remove "death investigation." Definition would read "medicolegal authority." Alternative, add NOTE that clarifies that this is often abbreviated, as will be used in this document, as "medicolegal authority."	The term "medicolegal authority" is more commonly used in the literature, by professionals, and in state statutes.	Accept- used definition from STD 217 to be consistent
7	54	3.1	E	organization concerning quality	organization with regard to quality	awkward	Accept
8	63-69	3.12	E		move term & definition to before the term "training" and renumber both to reflect the corrected order	term not in alphabetical order	Accept
9	78-80	4.2.1	E/T	Forensic anthropologists shall have a graduate degree in anthropology from an accredited college or university	Forensic anthropologists shall have a graduate degree in anthropology (or closely related field) from an accredited college or university	Some degrees beyond those earned solely in an Anthropology department should be considered acceptable as well. For example, degrees in Anatomy in general, or even more specifically the University of Dundee's PhD in Anatomy and Personal Identification.	Reject - this statement requires a graduate degree in Anthropology and does not specify whether it is a Masters or PhD. A graduate degree in Anthropology is required to sit for the ABFA certification. Petitions can be made to the ABFA if an applicant does not have the necessary degree

10	78-79	4.2.1	T	Forensic anthropologists shall have a graduate degree in anthropology from an accredited college or university.	Forensic anthropologists shall have a graduate degree in anthropology, or a closely related field (e.g., anatomy), from an accredited college or university.	<p>1) In its current form, requiring only anthropology graduate degrees would discredit many forensic anthropologists who's MA/MS and/or PhD were not in anthropology. For example, many D-ABFAs hold PhDs in related fields including: Kyra Stull, Heather Garvin, Diana Messer.</p> <p>2) Many anthropologists who get an MA/MS from an institution that also offers a PhD in anthropology may opt to pursue related fields for their PhD to augment their knowledge of human skeletal biology. Until the field has standardized curriculum distinct for UG, MA/MS, and PhD levels, it is unrealistic (and potentially gatekeeping) to require a PhD in Anthropology alone.</p> <p>3) A graduate degree in anthropology may not involve a focus in forensic anthropology nor may there be a forensic anthropologist at the university to provide adequate training. Inadvertently, this may allow for anthropologists not adequately trained in forensic anthropological methods to appear more desirable for jobs/training opportunities compared to those obtaining degrees that are focused in forensic anthropological methods under a different name.</p>	Reject - this statement requires a graduate degree in Anthropology and does not specify whether it is a Masters or PhD. A graduate degree in Anthropology is required to sit for the ABFA certification. Petitions can be made to the ABFA if an applicant does not have the necessary degree
11	79-80	4.2.1	T	This degree should be a Ph.D. with an educational curriculum that includes a broad foundation in anthropology and a focus in forensic anthropology.	This should be at minimum a Master's degree (or equivalent) with an educational curriculum that includes a broad foundation in anthropology and a focus in forensic anthropology.	<p>1) As currently written, a PhD as the minimum goes against the new model for the ABFA certification, which is tiered (analyst at the MA/MS level; diplomate at the PhD level). If this standard were published in its current form, there would potentially be board certified forensic anthropologists discouraged from practicing until they finish a PhD...</p> <p>2) There are numerous forensic anthropologists employed that have only a Master's degree (including many at the DPAA/SNA international and the ICRC).</p> <p>3) Most institutions granting MA/MS and PhDs in anthropology require the same courses and masters/phd students are in the same cohorts. In short, despite the difference in the degree earned, these students are effectively learning the same material, especially if the students are getting their degrees at the same institutions. A few examples of programs that follow (or followed) this model include: University of Tennessee Knoxville, Michigan State University, The Ohio State University, Louisiana State University, University of Nevada Reno.</p>	Reject - this is a should statement which is a recommendation, not a requirement (shall)

12	79-80	4.2.1	T	This degree should be a Ph.D. with an educational curriculum that includes a broad foundation in anthropology and a focus in forensic anthropology.	This degree (master's or doctoral) should include an educational curriculum with substantive, discipline-specific training in forensic anthropology and relevant to medicolegal casework (see Annex A).	While several graduate-level master's programs provide focused training in forensic anthropology, there are comparatively few doctoral programs that offer structured, comprehensive training specifically in forensic anthropology. Additionally, the phrase "a broad foundation in anthropology" encompasses substantial coursework in subdisciplines that are not directly relevant to forensic practice (e.g., cultural, linguistic, paleoanthropology). Conversely, doctoral training in adjacent disciplines such as human anatomy or related biomedical sciences may include coursework explicitly aligned with Annex A competencies, including musculoskeletal anatomy, medical imaging, and histology, areas that are not routinely or consistently offered within many Ph.D. programs in anthropology. Essential forensic-relevant coursework is often completed at the master's level rather than during doctoral training for anthropologists. Further possession of a Ph.D. in anthropology alone does not ensure that an individual has received the practical, experiential, or applied educational preparation necessary for forensic anthropology casework. It is entirely possible for an individual to complete a doctoral program in anthropology without adequate preparation for the logistical, operational, and applied demands of medicolegal forensic practice. At present, there is no widely established or consistently defined graduate degree in forensic anthropology with a standardized curriculum that reliably meets the breadth of competencies required for professional forensic practice. Until academic programs offering a clearly defined degree in forensic anthropology, with curricula explicitly aligned to forensic casework competencies, are more broadly available, it is unclear how a qualification standard can reasonably require or imply completion of a program that does not, in practice, exist in a consistent or accessible form. As such, qualification criteria should emphasize demonstrated competencies and relevant training rather than degree title or level alone.	Reject - this is a should statement which is a recommendation, not a requirement (shall)
13	n/a	4.2	E	n/a	add "Required competency areas for forensic anthropology practice are provided in Annex A." to the end of the 4.2.1 paragraph (prior to Note 1)	Annex A is buried in a note. This should be highlighted in section 4.2.1 due to its importance	Accept with modification. Section 4.2.2 added for normative reference
14	92	4.3.1	E	other types of professional mentoring (see Annex B)	add "Recommended areas of education, training, and experience are provided in Annex B." to the end of the 4.3.1 paragraph (prior to Note 1). AND ALSO delete "(see Annex B)" from Note 1	As written, this implies that Annex B provides other types of professional mentoring. Annex B is buried in a note. This should be highlighted in section 4.3.1 due to its importance	Reject - this information is informative (not a requirement or recommendation), and per ASB style, it belongs in a note
15	105	4.3.3.1	T	All training and experience should be supervised by a certified forensic anthropologist	All training and experience should be supervised by an appropriate forensic professional who is certified in their area of expertise when applicable or warranted.	1) It is improbable that all avenues to gain experience would be supervised via a forensic anthropologist (let alone a certified one), especially in a medicolegal laboratory setting where many forensic anthropologists are external consultants. Therefore, in order to "gain experience" in other competency areas (e.g., handling of evidence), this would need to be supervised by an appropriate forensic professional. For example, an intern at a medical examiner's office would likely be supervised by a death investigator or autopsy technician, not a forensic anthropologist. If necessary, there can be an appendix outlining different requirements for supervision.	Reject - this is a should statement which is a recommendation not a requirement (shall)

16	109-111	4.4	E/T	"...forensic anthropology practitioners shall obtain certification from an accredited body that assesses expertise and competence in forensic anthropology, when eligible."	"...forensic anthropology practitioners should obtain certification from an accredited body that assesses expertise and competence in forensic anthropology, when eligible."	<p>If the forward and scope are accepted as accurate that this proposed standard is to set forth the <i>minimum</i> qualifications, then the 'shall' in 4.4 should be changed to a 'should'. Historically many jobs in the field had a minimum requirement of an MA with a preferred qualification of a PhD. And there are still many jobs in the field with similar requirements (e.g., positions with SNA in support of DPAA, many Medical Examiner positions). Considering later this year (2026) will be the first year that those with a terminal MA can sit for the ABFA multilevel certification, it logically follows that no current practitioners with an MA have certification at present. As such, this proposed standard goes well beyond the minimum qualifications and is instead demonstrative of where some individuals in the field want to see the field headed but we simply aren't there yet. To say this proposed standard sets out minimum qualifications and then expects something that has not yet been obtainable for large swaths of practitioners is logically inconsistent. To try and force the issue runs the risk of discounting the work of many accomplished practitioners and especially their expert testimony in a court of law. It is well known in the field that numerous board certified anthropologists have had to take the ABFA exam multiple times, over many years, and so to impose a 'shall' on certification before the first cohort has been able to sit for the multilevel certification is putting the cart before the horse. For now it should be a should and perhaps changed to a 'shall' upon the five year revisiting/revision of this document.</p>	<p>Reject - the working group established consensus regarding the requirement (shall) of obtaining certification as a minimum discipline standard. The multi-tier certification has expanded access, and although the Analyst exam has not taken place, the phrase "when eligible" accommodates the time delay. This is a stand-alone document and is not dependent on job descriptions or requirements, nor is it written with the intent to discount individual practitioners. Additional information, if needed: the 2009 NAS Report recommended a national code of ethics for all forensic science disciplines. The National Commission on Forensic Science published "The National Code of Professional Responsibility for Forensic Science and Forensic Medicine Service Providers" in 2016. The code states that forensic practitioners must meet a set of requirements including "Foster and pursue professional competency through such activities as training, proficiency testing, certification, and presentation and publication of research findings." Ten years later, Forensic Anthropology is standardizing certification as a requirement that demonstrates professional responsibility.</p>
17	110	4.4	T	"forensic anthropology practitioners shall obtain certification...when eligible."	<p>Change "shall" to "should." Add Practitioners "shall initial the process of obtaining certification with X months/years of meeting eligibility requirements." Add to note: Board certification in forensic anthropology is a multi-year process. Practitioners can demonstrate commitment to obtaining certification by initiating the application process, when eligible.</p>	<p>Analyst certification is currently limited to 40 individuals per year with individuals applying this year not taking the exam until 2027. The next diplomate exam is also scheduled for 2027. It is obviously ideal with forensic anthropologist to obtain certification, but requiring individuals to have the certification in -hand immediately is not practical at this time.</p>	<p>Reject - the working group established consensus regarding the requirement (shall) of obtaining certification as a minimum discipline standard. The multi-tier certification has expanded access, and although the Analyst exam has not taken place, the phrase "when eligible" accommodates the time delay. Additional information, if needed: the 2009 NAS Report recommended a national code of ethics for all forensic science disciplines. The National Commission on Forensic Science published "The National Code of Professional Responsibility for Forensic Science and Forensic Medicine Service Providers" in 2016. The code states that forensic practitioners must meet a set of requirements including "Foster and pursue professional competency through such activities as training, proficiency testing, certification, and presentation and publication of research findings." Ten years later, Forensic Anthropology is standardizing certification as a requirement that demonstrates professional responsibility.</p>
18	110	4.4	T	In addition to the minimum qualifications established in 4.2 and 4.3, forensic anthropology practitioners shall obtain certification from an accredited body that assesses expertise and practitioners shall obtain certification from an accredited body that assesses expertise and competence in forensic anthropology, when eligible.	I think this needs to read should.	<p>The ABFA has just begun allowing MA practitioners to take certifications exams and, while I agree with certification, I think requiring it at this time is premature. There aren't enough forensic anthropology programs nationwide to train practitioners at the PhD level to work in the highest need areas of the country and, for midcareer practitioners with MA degrees or those working at unaccredited MEC offices, there is no incentive to move to pursue advanced degrees for the sole purpose of certification.</p>	<p>Reject - the working group established consensus regarding the requirement (shall) of obtaining certification as a minimum discipline standard. The multi-tier certification has expanded access, and although the Analyst exam has not taken place, the phrase "when eligible" accommodates the time delay.</p>

19	110	4.4	e	shall obtain certification	should obtain certification	These documents will be used against folks in court. Having the shall vs should may result in testimony or reports not being accepted from practitioners early in their careers. Should would provide more flexibility. The shall could also hinder folks working but not able to make it into the exam cutoff. At a minimum, change this to a should for the 1st edition then revisit in 5 years once folks have had chance to take the new 2 tier ABFA system.	Reject - the working group established consensus regarding the requirement (shall) of obtaining certification as a minimum discipline standard. The multi-tier certification has expanded access, and although the Analyst exam has not taken place, the phrase "when eligible" accommodates the time delay. This is a stand-alone document describing qualifications and is not dependent on how it will be used by the legal community. Additional information, if needed: the 2009 NAS Report recommended a national code of ethics for all forensic science disciplines. The National Commission on Forensic Science published "The National Code of Professional Responsibility for Forensic Science and Forensic Medicine Service Providers" in 2016. The code states that forensic practitioners must meet a set of requirements including "Foster and pursue professional competency through such activities as training, proficiency testing, certification, and presentation and publication of research findings." Ten years later, Forensic Anthropology is standardizing certification as a requirement that demonstrates professional responsibility.
20	112-115	4.4	E/T	Note 1 Certification is a necessary component of professional development, in part because it provides an objective means of demonstrating competence to practice. It is a key indicator to stakeholders (e.g., employers, medicolegal community, legal practitioners, families of decedents, and the public) that an individual is a competent practitioner in the area(s) in which they practice.	Note 1 Certification is a preferred component of professional development....	Since certification has not yet been available to many practitioners with a terminal MA, the current wording runs contrary to all of the job ads that require an MA but prefer a PhD and/or ABFA certification. As an example, forensic anthropologists with SNA international or many practicing within an MEs office. Clearly stakeholders such as employers and members of the medicolegal community are accepting at present of practitioners without certification since it has been unobtainable to many for decades. As such, the wording of Note 1 should be changed to certification being a preferred component rather than a necessary component. This can and should be revisited in the five year revision of this document, once there has been sufficient time for MA-level practitioners to sit for the certification exam.	Reject - The content of the note is informational and does not include a requirement (shall) or a recommendation (should)
21		4.4	Ballot Comment	I think the "shall obtain certification" in 4.4 is an issue and look forward to our group discussion.			Reject - No proposed revision provided.
22	121	4.5.1	E	All forensic anthropology practitioners	Remove "All" from the start of the sentence.	Qualifier is not needed and not used previously in the document.	Accept
23	138	4.5.1	E	postdocs	postdoctoral research position	"Postdoc" is jargon; a clearer definition would be "postdoctoral research position" (or similar)	Accept with modification. Not all postdoctoral jobs are research-based
24	160	6	E/T	- fail to maintain certification in the discipline	This bullet point should be removed from section 6 'Unacceptable Practices'	Considering the second half of 2026 will be the first time that MA-level practitioners can sit for certification through the ABFA's multilevel certification, it does not logically follow that in early 2026 a standard should be published that says it is an 'Unacceptable Practice' for a practitioner to 'fail to maintain certification in the discipline.' For all of those persons out there who have a job as a practitioner that did not require a PhD or certification at the time of hire, or does not require those things at present, this verbiage runs the risk of undermining those practitioners should a defense attorney level the accusation that a practitioner who is not yet certified (but perhaps has years or even decades of experience) is engaged in professionally 'unacceptable practices.' This verbiage should be revisited at the 5 year revision of this standard.	Reject - Section 4.4 provides flexibility for the multilevel certification with "when eligible." This is a stand-alone document and is not dependent on job descriptions or requirements, nor is it written with the intent to undermine individual practitioners. See resolutions for comment #11-12 for clarification on the degree requirement.
25	172	Annex A	T	processing	preparing and sampling	This would match ASB Standard 225 (draft).	Reject with modification. Added the terms "preparing and sampling" to the example
26	177	Annex A	E	"personal identification comparative methodology (e.g., evaluating medical and/or dental imaging)"	Eliminate "or"	Forensic anthropologists should be able to evaluate both. The "or" also allows this example to read that forensic anthropologists may only be competent in evaluating dental (but not medical) imaging.	Reject with modification. Removed "and" because "or" is inclusive
27	191	Annex A	E	and familiarity with medicolegal authorities and jurisdictions;	and familiarity with medicolegal authorities and jurisdictions; and	Final conjunction ("and") need at the end of the list.	Accept
28	203	Annex B	E	Fourier-transform	Fourier transform (delete hyphen)	the hyphen is not typically included in scientific publications or in educational or industry website content	Accept
29	212	Annex B	E	unidentified decedent databases (e.g., NamUs, NCIC, NCMEC);	unidentified decedent databases (e.g., NamUs, NCIC, NCMEC); and	Final conjunction ("and") need at the end of the list.	Accept
30	212	Annex B	E	NamUs, NCIC, NCMEC	spell these out and include acronyms as was done for other items in Annex B	XRF, XRD, etc., are spelled out. It is not clear why these are different and don't need the same treatment	Accept

31	234	Annex C	E	Galloway A.	Galloway A.,	add comma to separate authors	Accept
32	n/a	Annex C	T		consider adding more recent references from 2024-2025 to avoid dating this standard	most recent reference is 2023	Accept- Added new references