

Public Comments Deadline: January 3, 2022
ASB BPR 144, Best Practice Recommendations for the Verification Component in Friction Ridge Examination

#	Section	Updated Section	Type of Comment	Comments	Proposed Resolution	Final Resolution
58				I don't believe this document was reviewed sufficiently.		Reject: This document is proceeding through the ASB process as stated in ASB's procedures.
46	All		T	When this document was initially prepared by OSAC, the general understanding was that Best Practice documents could occasionally use "shall" language. However, it is now understood that "shall" statements will only be included in Standards and not in Best Practices. The universal verification of Identification conclusions is a critically important quality assurance measure in virtually all forensic laboratories. I believe it is vital to maintain this practice as a "shall" standard.	Re-draft this document as a Standard and include "shall" language for the verification of Identification conclusions.	Reject: This document was submitted to ASB as a Best Practice Recommendation and it was approved as such by the CB (consensus).
41	General		T/E	Non-blind verification should not be an option. The ASB manual defines a best practice recommendation as a document which "identifies and sets forth the optimal way to carry out an action or actions." Non-blind verification is not the optimal way to carry out verification, as it does not protect against potential biases and influences. If a FSP is not able to carry out blind verification, it should not be able to claim that it is following a best practice.	Remove non-blind/open verification from the proposed BPR and edit appropriately in sections 3.6, 4.4, 4.5, and all of section 5.	Reject: Matching comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
42	General		T/E	There should be a bibliography available for review. We cannot assess the warrant for the claim without the evidence and the nature of the research that has been done contributes directly to what can be said about forensic conclusions.	Add a bibliography.	Reject: ASB Manual, section 12.1 calls for normative references only if the document cannot be implemented without them and 19.1 says bibliographies are optional.
31	3.1	Deleted	T	"ACE (an examination method)" It has clearly been established by the NAS report that ACE is not specific enough to be considered a method.	Remove that ACE is considered to be a method. It is an acronym for Analysis, Comparison and Evaluation.	Accept with modification: The definition has been deleted and references in the document were replaced with generic "examination" term.
32	3.1	Deleted	T	"ACE (an examination method)" An examination method used to refer to Analysis, Comparison and Evaluation." ACE is not "used to refer to...", it is used to compare different impressions.	ACE acronym for Analysis, Comparison, Evaluation	Accept with modification: The definition has been deleted and references in the document were replaced with generic "examination" term.
23	3.7	3.6	T	QA is not to 'detect' errors (per quality theory). QA is activities to prevent errors, not catch them.	Modify the definition of QA to be in line with common QA theory.	Reject: The current definition is clear and aligns with best practice.
1	3.8	3.7	T	3.8 needs to be moved up before suitability decision - it is currently in the middle of the "suitability decision utility decision" definition	Fix typo	Reject: Suitability Decision and Utility Decision share a common definition and the stacking of these terms is intentional.
30	3.9	3.8	T	An independent examination can only show if the conclusion is reproduced, it cannot determine if the conclusions conform to specified requirements. Only a review can determine if a conclusion conforms to a specified requirement.	Modify the definition to say that verification ascertains if the conclusion is reproducible.	Accept - (original Note 1 was removed)

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48	3.9 verification	3.8	T	This rewrite does not provide a clear distinction between blind verification, open verification, technical review and verification. Is verification different from "open verification" (see 3.6). If so how? Is verification different from technical review? What are the "specified requirements" when an examiner makes a determination that the observed features strongly support a common source opinion, this is a subjective determination. Technical review covers compliance with the FSP's policies and procedures, what additional process is brought to bear in (non-blind) verification. And what does it mean in this context to be an "independent examination"? It appears to mean having sufficient materials such that the 2nd examiner can form a conclusion/opinion without relying on any decisions/judgements/assumptions of the prior examiner. But arguably a blind verification is what is meant by independent as one both doesn't rely on the work of the previous examiner and is not influenced by the work of the previous examiner.	Redraft to present with specificity the differences between a blind verification, an open verification, a verification and a technical review	Accept with Modification: Section 1 states "This document does not address Technical Review". References to "specified requirements" have been removed from the verification definition. Section 3.8 Note 1 now states that there are different forms of verification available and that "verification" is the general term. The various types of verification have their own definitions. Section 3.8 Note 3 now clarifies the use of the term "Independent"
49	4 recommendations		T	There is no empirical research showing that open verification is an effective quality assurance tool and there is anecdotal evidence that it has failed to detect errors. On the other hand, there is general consensus that blind verification has been demonstrated to be an effective quality assurance tools in a variety of settings analogous to forensic comparisons. This document should recommend adoption of blind verification wherever possible and set open verification as a minimum standard.	Redraft recommending blind verification whenever possible.	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
11	4.1		T	The sentence makes no sense. The 'should' implies verification can be performed another way. This is not a recommendation, it is rewording of the definition.	Remove the word should	Accept with modification: Section 4.1 has been deleted and the corresponding Note was moved to section 3.8 (verification definition).
43	4.1	Deleted	E	The note states that an independent examination is "not necessarily one without knowledge of a prior decision, conclusion, or opinion." However, the examination cannot be deemed independent if there is prior knowledge of another's opinion.	Change to, "The use of the term 'independent' throughout this document indicates an autonomous examination <i>and is</i> one without knowledge of a prior decision, conclusion, or opinion."	Reject - The clarification of the term independent was added to address the assumption that independent as used in this document was equivalent to "blind" which is not correct. The proposed changes would alter the fundamental recommendations of this document. Section 4.1 has been deleted and the note was moved to the verification definition in Section 3.8.
2	4.2	4.1	E	Conflicting wording - "verification should apply to all decisions including utility..." then in the next sentence "At a minimum, verification should apply to all source identification, inconclusive with similarities and source exclusions." The minimum recommendations should be listed first so that the statements do not conflict with one another. I agree that utility decisions should be reviewed to ensure that they conform to agency standards but I do not think they should have to reviewed as part of verification.	Change to the following: At a minimum, verification should apply to all source identification, inconclusive with similarites and source exclusions. All other decisions, including utility should be reviewed prior to the release of the report. This can be done during technical review or verifictaion.	Accept with modification: Section 4.1 was edited for clarity.
47	4.2	4.1	T	See above comments regarding Best Practices, Standards, and "shall".	Re-draft this document as a Standard and include "shall" language for the verification of Identification conclusions as written in the original OSAC version of this document.	Reject: This document was submitted to ASB as a Best Practice Recommendation and it was approved as such by the CB (consensus).
50	4.3	4.2	E	The Examination Standard uses "examination" rather than "ACE"	Replace "ACE" with "examination" throughout document	Accept: Definition 3.1 was removed.

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7	4.4 4.4.1	4.3 4.3.1	T	4.4 states that it is up to the FSP what type of verification should be used. Then in 4.4.1 it implies that there are situations where blind verification is required by requiring the FSP to have a policy on when it shall be used. As there are no studies in FRS that have shown which type of verification to be most effective. Comment a) should be limited to ABIS searches in large databases. Smaller local databases to not have the same risk as larger databases such as NGL. Comment b) high profile cases have not been show to cause an increase in errors due to bias.	Reword that FSP should have a policy if and when blind verification is required. Comment a) reword to include large database searches. Comment b) remove	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. The way this section reads is appropriate for this document. Please refer to CB approved previous comment resolutions.
3	4.4.1	4.3.1	E	Is there statistical information to back up an error being more likely with a single identification from an ABIS search vs a manual comparison or multiple identifications made to a subject? You could have a very high quality single identification from ABIS that is close to being a 10-print. Why bother with blind verification in those circumstances which are very low risk. I am not asking for a major change here - I just think that 4.4.1a and 4.4.1d should be combined. If it is a low quality single-identification from ABIS it should go through blind verification. You should consider this carefully because you need agency buy in here and if you have too many cases that by your best practices document should go to blind verification, it will not be done - see 4.4 "FSPs should balance any advantage of blind verification (for quality control purposes) against the additional time it may require." Please understand that blind verifications take a lot of time. The case infomation needs to be removed from the information presented so a new tracking number will be needed. You cannot just send through identifications in blind vericiations so you will need to add irrelevant information to the case file (additional subjects), you will also need to send through cases with no identifications or they will always know that they are likely being presented with an identification (see 5.1.2) in blind verification. Then, the information needs to go back to the person that prepared the blind review to determine if there is a conflict (see5.4). It is a very time consuming process and I don't think there is much benefit so in many cases 4.4 will be applied which negates this entire best practices document. A little shift in your wording could get this done more often and in cases with higher risk of error.	4.4.1a) single-identification (or inconclusive with similarites) ABIS searches or manual comparisons to a particular individual where the impression is complex (low quality, high ambiguity, distortion, etc.) as defined by FSP policy. Strike out 4.4.1d)	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. The way this section reads is appropriate for this document. Please refer to CB approved previous comment resolutions.
39	4.4.1	4.3.1	T	It is suggested that a blind verification be used on complex comparisons; however, a case may only include 1 complex comparison. Document is not clear on whether a blind verification is needed on the entire case in this example or if it's only needed on the complex comparison and an open verification could be done on the remainder of the case.	Clarify wording on criteria for complex comparisons and blind verification to make it clear whether the recommendation would be to do a blind verification on only the complex comparison/impression or if the recommendation applies to the entire case	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. The way this section reads is appropriate for this document. Please refer to CB approved previous comment resolutions.
51	4.4.1	4.3.1	E	First sentence is a definition, not a recommendation and repeats 3.2	Delete first sentence	Accept
12	4.4.1 a-d	4.3.1 (a-d)	T	This is dogma, there is no support that this is when blind verification is useful.	Find out when blind verification is useful before recommending it. Remove all of these as they are unsubstantiated. (Example, a single ID with 100 clear features in common has no risk and blind verification is nothing more than a false QA measure.	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. The way this section reads is appropriate for this document. Please refer to CB approved previous comment resolutions.

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52	4.4.1 Note 2	4.3.1 Note 2	E	Typo	Change backlash to slash	Accept
13	4.4.1 note use of decisions, conclusions, and opinions	4.3.1 Note 2	T	Are decisions, conclusions and opinions being used synonymously or are they different things?	Define the difference between these words. If they are synonymous then use the most transparent word 'opinion'.	Reject: "Decisions" - see Section 3.7; "Opinions" - see Sections 3.2 & 4.5; "Conclusions" - standard usage within Friction Ridge Discipline. Inclusion of all three terms was deliberate to be all-inclusive for verification. Additional clarification not needed.
5	4.4.2	4.3.2	E	Wording too strong for a recommendation document: Open verification "can" be used when none of the suggested criteria for stated for blind review are present. You are giving permission to use open verification if the blind review criteria are not present, but the blind review criteria are only suggestions.	Strike out last sentence or replace the word "can"	Reject: Document previously reviewed for the proper use of "can" and "may" statements in recommendations. The usage of "can" in this recommendation is correct and appropriate.
8	4.4.2	4.3.2	E	The wording of this section implies that blind verification will be required.	Eliminate last sentence. If and FSP defines when blind verification needs to be used then by default open verification would be used in all other instances.	Reject: Section 4.3.1 clearly states that FSPs shall determine when blind verifications are required but also recommends criteria under which it should be required. The second sentence in the commented section is appropriately stated to correspond with the recommended criteria stated in Section 4.3.1.
14	4.4.2	4.3.2	T	It appears as though this entry is defining a new term 'open verification', to the discipline. The first sentence is a definition, not a recommendation, and should be put in the definitions section.	Since this is new, define the term in section 3.	Accept with Modification: "Open (non-blind) verification" already defined in Section 3.5. First sentence of Section 4.3.2 was removed.
33	4.4.2	4.3.2	E	Missing word	Insert the word "to" in following statement: "subsequent examiner has access to another examiner's decisions...."	Reject with Modification: No longer applicable as the first sentence of section 4.3.2 has been deleted.
53	4.4.2	4.3.2	E	First sentence is a definition, not a recommendation and repeats 3.6	Delete first sentence	Accept
4	4.4.3	4.3.3	T	You have no definition of "enhanced verification" in the definition section	Add definition of "enhanced verification"	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
6	4.4.3	4.3.3	E	This is redundant (see 4.4.1a) and is there statistical information to support the statement "This is due to the greater risk of error in these types of cases"? Are there no cases where there are bad identifications made to a listed suspect in the case?	Strike out 4.4.3	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
9	4.4.3	4.3.3	E	The risk is from large database searches	Add large database searches to requirement for enhanced verification	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
15	4.4.3	4.3.3	T	There is no support that blind verification is 'enhanced'.	Give a reference to show blind is enhanced or remove the word 'enhanced'.	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
16	4.4.3	4.3.3	T	There is no support that a single ID has a greater risk of error. The risk of error is dependent on the complexity of the comparison, not on how many ID's are made.	Remove the sentence 'This is due to the greater risk of error in these types of cases.'	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
17	4.4.3	4.3.3	T	There is no support that a inconclusive with similarities has a greater risk of error. This conclusion has not been used or tested so you cannot determine what the risk is yet.	Remove any evaluation of risk for inconclusive with similarities.	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.

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36	4.4.3	4.3.3	T	not all single source IDs have a greater risk of error if they came from an ABIS search. Moreover, it has not been demonstrated reliably that ABIS generates more errors in Friction Ridge Examinations. No research has been published to show that more errors are made on all single latent identifications from an ABIS. The errors that have occurred have been on complex single latent IDs and the wording in the document should reflect that distinction.	reword 4.4.3 to say "FSPs should conduct enhanced verification (i.e., blind, multiple, etc.) when a complex, single 'Source Identification' or 'Support for Same Source' conclusion has been drawn to a particular individual after an ABIS search. This is due to the potential risk of error in these types of cases	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
37	4.4.3	4.3.3	T	There is no research to support that blind verification is an "enhanced" verification. It is a separate type of verification but there is nothing to support that it is inherently better than an open verification	remove the word "enhanced" since 4.4.1 already lists criteria of when a blind verification should be conducted	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
38	4.4.3	4.3.3	T	blind verification is covered but the use of multiple verifiers (whether open or blind) is not discussed within in the document outside of the parenthetical in 4.4.3	add wording about the use of multiple verifiers and criteria for when multiple verifiers should be utilized in a case	Reject: Each instance of a verification should follow the recommendations listed within this document. No additional clarification is needed or recommendations are being made for multiple instances of verifications outside of consensus opinion which is described.
54	4.4.3	4.3.3	E	Repeats 4.4.1.a	Delete one or the other	Reject: Recommendation expands upon options that may also be implemented by FSPs under the listed criteria.
18	4.5	4.4	T	Consensus is not a QA measure as it does not prevent errors (defects). Also, the first sentence is a definition, not a BP and belongs in section 3.	Remove the first sentence.	Accept with Modification: First two sentences were removed.
44	4.5	4.4	E	The consensus opinion is defined here as the collective judgement, followed by majority as another example. Majority does not mean the same thing as consensus and collective, which leads to confusion over whether all examiners need to agree or not.	Remove majority as an example or explain the limitations of reaching a conclusion if the panel is not in agreement.	Accept - References to majority removed from definition (Section 3.2)
19	4.6	4.5	T	This section brings up a new term 'contemporaneous documentation'	Please define this in section 3.	Reject: Similar comments and resolutions reviewed and rejected in previous round of public review. Please refer to CB approved previous comment resolutions.
20	4.6	4.5	T	The sentence should be discussing the 'documentation of the basis for the conclusion'. The way it is stated, it is discussing the 'documentation of the verification'.	Reword this to indicate that the documentation is regarding the basis for the conclusion, indicating similarities and dissimilarities.	REJECT - As verification is an independent examination with documentation listed in Sections 5.2 & 5.3, no further clarification of this recommendation is required.
45	4.6	4.5		This section states that "Contemporaneous documentation of the verification shall(s) should be included in the case record." This information should also be indicated (but not documented in full) in the laboratory report.	Add language to 4.6 that references a verification was conducted as part of the analysis and the documentation is in the case file.	Reject: Section 5 deals with the documentation of verification (in the case file). The inclusion of verification in the report is a matter for a separate document.
55	4.6	4.5	E	"will" is unnecessary	Delete "will"	Accept
21	4.7	Deleted	T	4.6 states 'The FSP should have a policy to address nonconforming work.' There needs to be a link as why this belongs in this document. The way it stands, this says nothing about verification, which is what this document is about.	Elaborate on this topic so it's clear how it relates to the topic at hand (which is verification).	Accept with Modification: Section 4.7 was deleted.
56	4.8	Deleted	E	Not sure this is necessary given the existence of the Conflict Resolution BPR and 5.4	Consider deleting section	Accept
22	5.1		T	The definition of verification does not indicate there are different types of verification.	Modify the definition of verification to indicate that there may be different types of verification.	Accept with Modification - see Note 1 of the Verification definition
24	5.1.1		T	This appears to be a subsection of 4.4.2	Move this to be a subsection of 4.4.2 so those performing this activity know the recommendations involved.	Reject: This is the procedural section and includes the practice of recommendations stated previously.
57	5.1.1.		E	Section jumps back and forth between open and blind verification	Starting here, this section should probably be organized into 3 subsections for open, blind, and consensus verification	Reject: This section is organized by procedural sequence rather than by verification type. Each recommendation (after the first) is prefaced by the applicable verification type(s) with some procedural steps being applicable to multiple verification types. The current organization is appropriate.

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10	5.1.2		T	This section is vague and does not provide a strong recommendation. Digital enhancements have not been shown to introduce bias and therefore there is limited evidence for including this as a recommendation.	Remove digital processing or reword to say that any potentially biasing information should be removed.	Accept
25	5.1.2		T	This appears to be a subsection of 4.4.1	Move this to be a subsection of 4.4.1 so those performing this activity (blind) know the recommendations involved.	Reject: This is the procedural section and includes the practice of recommendations stated previously.
34	5.1.2		T	Use of "un-enhanced" is not the preferred terminology and does not correspond to the phrase used at the beginning of the same sentence ("digital processing").	Update to state "unprocessed" instead of "un-enhanced" for consistency with the rest of the document.	Reject with Modification: Section 5.1.2 was updated for clarity and this statement was removed.
40	5.1.2		T	if the blind verifier is not getting any of the documentation at any time of the process then they are only verifying the repeatability of the conclusion and not reviewing the basis of the initial examiner's conclusions. Part of verifying a case is ensuring that the method and data used to reach a conclusion is appropriate and should be done with any form of verification	update wording to include that documentation of the initial examiners work should be given to the blind verifier after they have completed their examination to verify the basis of the initial examiners conclusions	Reject: The review that is stated in the proposed recommendation is part of the Technical Review process and not included in this document.
26	5.2		T	This appears to be a subsection of 4.4.2	Move this to be a subsection of 4.4.2 so those performing this activity know the recommendations involved.	Reject: This is the procedural section and includes the practice of recommendations stated previously.
27	5.3		T	This appears to be a subsection of 4.4.1	Move this to be a subsection of 4.4.1 so those performing this activity (blind) know the recommendations involved.	Reject: This is the procedural section and includes the practice of recommendations stated previously.
35	5.3		T	Section implies that exemplars are required to have ACE documentation. There is no requirement or standard for ACE documentation to be completed by an original examiner. ACE documentation of exemplars would only ever be completed by a blind verifier based on this statement. Exemplar ACE documentation is unnecessary in latent comparison casework and is also not completed by 10 print examiners who work solely with exemplars.	Update section to state "For blind verification, the verifier should conduct and document an independent ACE on any unmarked and unknown friction ridge impressions."	Accept with Modification: Reworded recommendation to state "5.3 For blind verification, the verifier should conduct and document an independent examination on unmarked friction ridge impressions." Documentation requirements for exemplar images are not the subject of this document.
28	5.4		T	documents should not refer to unpublished documents.	Remove the parenthetical, removing it takes nothing away from what is being recommended.	Reject: Your comment is correct. However, the reference will be added prior to this document's publication and ASB will not publish this document unless it references published documents.
29	5.5		T	it is unclear what decisions and conclusions are being referred to.	Reword to say 'each independent opinion should be retained in the case file.'	Accept with Modification: Reworded to state "...all decisions and conclusions of each examiner contributing..."