



2016-2017 AFOAM BOARD

<i>President</i>	Lori Nix
<i>President-Elect</i>	Melinda Raines
<i>Secretary</i>	Lise Swacha
<i>Treasurer</i>	Chris Krug
<i>Past President</i>	Cindy Moran

6/8/2017

Re Docket No OLP 160

The Association of Forensic Quality Assurance Managers is a professional organization of more than 230 members currently in charge of and responsible for designing, conducting, and maintaining quality assurance activities in forensic laboratories across the United States and abroad. The mission of our organization is to promote standardized practices and professionalism in quality assurance management for the forensic community. We carry out this mission by providing support to laboratories of all sizes, at all stages of development and with access to varying levels of resources. We appreciate the opportunity to provide public comment on the topic of advancing forensic science in the United States and we are providing comments on three of the proposed questions in the Request for Public Comment Docket No. OLP 160, Advancing Forensic Science, which directly impact quality assurance activities.

What is required to improve forensic science quality assurance practices at the federal, state, local, and tribal levels?

AFQAM strongly believes that one of the primary factors to good quality assurance is accreditation by a body who is a signatory to the ILAC MRA. Therefore, *AFQAM strongly supports the call for mandatory accreditation of all forensic service providers in the United States.* This will require intentional action and funding on the part of all levels of government as attaining and maintaining accreditation is a time consuming and expensive process. This is especially important to smaller agencies that do not always have the experience, required support, or resources to attain and effectively maintain accreditation.

Along with accreditation goes certification. *AFQAM supports encouraging certification of individual analysts in their forensic disciplines.* Before certification should be mandated, however, improvement in forensic certification programs needs to occur. Certification programs must be meaningful and reflective of current technology and techniques in the applicable discipline. Significant differences exist between different programs in the difficulty to achieve and maintain certification, as well as the benefits each program provides to the analyst. One way to improve the disparity in certification bodies could be to encourage or require them to be accredited to ISO/IEC 17024.

Finally, inherent to accreditation is the recognition and promulgation of standards for quality assurance both generally as well as in each discipline specific standard that is developed.

AFQAM supports an intentional focus on and support for quality assurance considerations in all standards currently being developed. The Organization of Scientific Area Committees (OSAC) is currently working on many different standards, and the Quality Assurance Managers that are members within the body of the OSAC are working on ensuring that appropriate quality assurance measures are included. There should be continued support for the focus on these topics throughout all OSAC activities.

What are the specific quality assurance issues related to digital forensic evidence analysis and how can the Department address those needs?

AFQAM encourages the development of better education and understanding of quality assurance within the Digital and Multimedia Evidence (DME) discipline. DME as a discipline presents some unique challenges to quality assurance activities within forensic science laboratories. The work this discipline performs, the methods and tools used, and the output produced are all unique within the forensic science disciplines.

AFQAM believes there is a need for standard guidance on how DME specific software tools should be addressed within larger quality assurance and accreditation programs. The tools and methods utilized by this discipline are different from others and inherently need to be more nimble and responsive to quickly and ever changing technologies.

Finally, AFQAM believes that recognized standard methods for Digital and Multimedia Examinations are needed to ensure that all providers, accredited or otherwise, are performing the same high quality examinations. As previously stated, we strongly support the idea of mandatory accreditation in all forensic science disciplines; however, we recognize that in the DME field this will be challenging as many police agencies have their own personnel trained in various DME analysis and retrieval tasks. Regardless, intentional effort should be made to ensure that all practitioners of these methods are using only standard methods which include good quality assurance practices.

How should the Department, or any Department entity, coordinate with the Organization of Scientific Area Committees?

AFQAM strongly supports the efforts being made within the Organization of Scientific Area Committees, and would encourage the continued strong support of this effort. In order for this to continue, the efforts on developing a long term strategy and plan to include regular funding for the OSAC must be supported. Inherent to this plan should be a focus on collaborative and non-duplicative efforts through the organization.

AFQAM believes there should be a focus on the development of overarching cross-disciplinary quality assurance standards whenever possible to enhance consistency across all disciplines. The support of these efforts from the Department, as well as within the new strategic plan of the OSAC are important. Efforts are currently being made within the OSAC to identify these opportunities and capitalize on them when possible. However, the breadth of the forensic science disciplines represented within the OSAC can be an obstacle to this effort.

AFQAM believes that the Department should continue to ensure our recognized participation within the OSAC. AFQAM members are specifically (although unofficially) represented on the

Quality Infrastructure Committee within the OSAC. As quality assurance managers we are responsible for developing and implementing overarching and cross-disciplinary quality assurance standards every day in each of our laboratories. We have specific knowledge and expertise in accreditation standards, and can understand what newly developed requirements will take to implement. Many of us have both specific proficiency as well as broad knowledge across the breadth of the forensic science disciplines that allows us to view new requirements from a larger perspective. We believe the body of knowledge present within the members of our organization is of significant importance to the work of the OSAC.

Sincerely,
AFQAM Executive Board