

10/30/2017

RE: Request for Information on the Development of the Organization of Scientific Area Committees (OSAC) for Forensic Science 2.0

ID: NIST-2017-0001-0001

The Association of 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 local, county, state and federal law enforcement and private forensic laboratories across the United States and abroad. We appreciate the opportunity to provide public comment on the Development of the Organization of Scientific Area Committees (OSAC) for Forensic Science 2.0. The organization is providing comment on three of the six areas which directly impact quality assurance activities.

(C) Work products and aims: What is your opinion regarding whether the OSAC is fulfilling these aims as structured? Do you believe that the OSAC is addressing the correct aims? What are your views as to the type of work products the OSAC should produce? What do you believe are the essential elements of work products? Opinions as to whether there should be implementation/enforcement of the work products. Do you believe that the OSAC should develop “best practices” and other materials that are not formal “standards”?

AFQAM believes that the aims of the OSAC are appropriate however most of the aims are currently not being met. The two aims that specifically impact quality assurance that AFQAM believes are not being met include: develop and maintain Principles of Professional Practice; and promote and improve the communication, dissemination and use of forensic science standards, accreditation and personnel competencies. AFQAM believes that the aims of the OSAC are appropriate however; the focus of the OSAC may be too broad to meet all the aims.

The focus of the work products should be to provide guidance to forensic service providers of best laboratory practices. As an organization based in quality, AFQAM strongly believes in the development of standards and best practices. AFQAM supports the enforcement of standards developed by the OSAC, however does not believe the OSAC should be the organization that oversees enforcement. More appropriately, enforcement should be a part of accreditation by an accrediting body who is signatory to the ILAC MRA or through personnel certification. Any implementation or enforcement of the work products could not be required without ensuring forensic service providers had the resources needed to comply.

D) Structure: What are your views as to whether the current OSAC structure works efficiently? Do you believe that another structure should be utilized? Please provide your opinion about whether there are any issues in the current work product development process that should be addressed structurally. In your view, does the reliance on standards development organizations function as intended (please include the reasons for your opinion)?

2017-2018 Executive Board

Melinda Raines, President • Erin Henry, President-Elect • Lori Nix, Past President
Abby Schwaderer, Secretary • Chris Krug, Treasurer

AFQAM believes that the OSAC structure is working; however the process is understandably slow considering the task. The involvement of standards development organizations does not seem to function as intended. The development of standards by the OSAC seems like a duplication of efforts with the current standards development organizations such as the ASTM and the ASB. Each of those organizations are working on the development of their own standards as well as revising drafts from the OSAC. To become more efficient, there should be some overlap on the committees from all organizations or the integration of the SACS into the SDOs so that the groups are working together and not independently, allowing for work products to move quicker through the standards process.

E) Participation: What are your views as to the community the OSAC should serve? In your opinion, what stakeholders must be a part of the OSAC (e.g., practitioners, researchers, forensic science societies, accreditation bodies, scientific societies, human factors experts, metrologists, standards development organizations, legal practitioners)? If you think that any of these entities should be excluded, please explain why and identify other venues for the views of the excluded entities to be incorporated into forensic practice, if appropriate. In your view, should some stakeholders serve more limited roles and, if so, how and why?

Based on the charter of the OSAC the community that it is primarily serving is the forensic science community. AFQAM stands by OSAC in acknowledging that this community has many stakeholders. AFQAM believes that all stakeholders have a valuable opinion to add to the OSAC process and should not be excluded. There needs to be better communication between the stakeholder groups, so that an agreement can be made about the current status of forensic science, where it should be, and what intermediate steps need to be taken to move toward the desired goal. Each of the stakeholders has a different role that they serve that is not necessarily equal. The opinion of the each of the stakeholders should be limited to their area of expertise. The primary focus of the OSAC is to strengthen forensic science in the United States. Forensic science therefore should be the focus and the OSAC should not allow the agenda of other stakeholders to hold up the OSAC process.

Sincerely,
AFQAM Executive Board

2017-2018 Executive Board

Melinda Raines, President • Erin Henry, President-Elect • Lori Nix, Past President
Abby Schwaderer, Secretary • Chris Krug, Treasurer