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November 12, 2013

National Institute of Standards and Technology  
c/o Susan Ballou  
100 Bureau Drive  
Mailstop 8102  
Gaithersburg, MD 20899

RE: Notice of Inquiry on Possible models for the Administration and Support of Discipline-Specific Guidance Groups for Forensic Science

To Whom It May Concern,

The Association of Forensic Quality Assurance Managers (AFQAM) is a national organization that promotes standardized practices and professionalism in quality assurance management for the forensic science community. Our organization is composed of approximately 250 members from all levels of government (federal, state and local) as well as accrediting bodies and private laboratories who are actively involved in furthering forensic quality assurance in their organization.

On behalf of our membership, we submit the following response to the notice in the Federal Registry regarding the perspectives on the appropriate model for NIST administration and support of discipline-specific Guidance Groups.

**1. Structure of the Guidance Groups:**

- The Guidance Groups should be comprised of a majority (at least 75%) of current, proficiency tested practitioners in the discipline represented by the working group. This helps ensure that any guidance is evaluated from the bench level perspective to ensure that it can be implemented feasibly.
- The remaining representation should come from other forensic science stakeholders - Laboratory Directors, Quality Assurance Managers, Attorneys, Researchers, etc.
- The Guidance Groups membership should be representatives from federal, state, and local practitioners from all parts of the country. Such representation promotes a thorough evaluation of guidance from all sizes and organizational structures of labs and lab systems. Representation from the different levels should be commensurate with the actual quantity of evidence analyzed at each of those levels. State and local laboratories work the vast majority of all evidence analyzed in the U.S. and consequently have the vast majority of the backlog. Even representation from all regions of the country also helps ensure that guidance addresses all issues seen within a discipline and does not become overly focused on issues only seen in one region.
- Practitioner representatives should be from accredited laboratories.

- Historically, SWGs have operated without much cooperation or coordination. A centralized governance that offers a coordinated and cohesive structure and organization for the many guidance groups has the potential to offer huge benefits.

## **2. Impact of Guidance Groups:**

- Guidance Groups should develop a close relationship with the accrediting bodies such as ASCLD-LAB, FQS and A2LA. Accrediting bodies have the benefit of assessing a laboratory's practices on-site. A relationship between the two will allow them to make a more informed determination about whether the laboratory's practices are appropriate based on any accepted or recognized guidance documents.

## **3. Representation in the Guidance Groups:**

- At least one representative of each Guidance Group should be an individual who spends at minimum 50% of their time performing QA related tasks. The QA Manager can provide accreditation support for the disciplines including compliance with international standards and supplemental accrediting body requirements.
- The vast majority of members on any given group should be actively involved in a forensic science laboratory. Members from academia, non-profit, and industry may have unique and useful perspectives, but their basic motivations and organizational goals can be very different from that of a forensic science laboratory.
- Guidance groups should engage existing national and international forensic science organizations, such as AFQAM, IAI, AFTE, AAFS, etc. relevant to the particular discipline to play a role in standards development and practice.

## **4. Scope of the Guidance Groups:**

- There should be a cross-disciplinary approach for the Guidance Groups to issue one guidance document of common interest (i.e. quality assurance, measurement certainty, etc). For instance, SWGs such as SWGGUN, SWGFAST & SWGDRUG have published Quality Assurance guidance documents in the past. Multiple guidance documents on the same subject could result in conflicting requirements between the different documents.
- A Quality Assurance Guidance Group should be established. Quality Assurance is the one "discipline" of a laboratory that can greatly impact all other disciplines through the policies and procedures which apply to an entire laboratory. This QA group would publish consensus guidance documents for Quality Assurance topics that affect the whole laboratory, such as proficiency testing, courtroom testimony monitoring, administrative and technical reviews, corrective and preventative actions, audits, method validation and document control. The other Guidance Groups would produce documents specific to that discipline/area of forensic, such as technical procedures, report writing, training requirements, and terminology.

Sincerely,



Christopher Krug, President  
Association of Forensic Quality Assurance Managers