Public Comments Deadline: May 9, 2022 ASB BPR 144, Best Practice Recommendations for the Verification Component in Friction Ridge Examination

#	Section	Type of Comment (E- Editorial, T- Technical)	Comments	Proposed Resolution	Final Resolution
3	3.4, 3.6, 3.8		Note 2: Verification as checking the reproducibility is not a QAM as described in the definition of QAM because reproducibility does not correct, minimize or prevent nonconforming work. Verification, as described, simply identifies conflicting conclusions. More investigation needs to be done in order to determine the underlying problem (RCA) and correct the reason for the conflicting conclusion (CA). The reason may not be non-conforming work, the reason could be that the SOP is so vague that it allows for differing conclusions.	Ensure concepts work together: nonconforming work, QAM, verification,	REJECT - The full definition of QAM included within the document states "Steps taken by an FSP to <u>detect</u> , correct, minimize and/or prevent nonconforming work." Verification is a process by which nonconformity may be detected. How a FSP handles detected nonconformity is outside of the scope of this document. There is no discord with these concepts within this document.
1	3.8	Т	Language of 3.8 suggests that all of these forms of verification are equally valid in any situation and fully up to discretion of lab.	Add at end: "Non-blind verification is not best practice in all situations. Please refer to later sections to determine the appropriateness of non-blind verification."	REJECT - Proposed resolution is too prescriptive for a definition. The best practice recommendations for verification are contained within the body of the document.
7	3.8		Verification as reproducing the result is not a best practice because results can be reproduced that are incorrect (exclusions, mayfield, etc.). The BEST practice is for verification to be questioning and doubting the conclusion and the support for the conclusion, as stated by Huber and Ashbaugh. I do not believe is wise to recommend poor practices just because this is the easiest thing to do. It is enabling agencies to get incorrect results.	Recommend a real BEST practice, which is verification as a thorough review of work (as promoted by Huber and Ashbaugh).	REJECT - The definition of Verification describes verification as an independent execution of ACE and not as the deliberate and intentional reproduction of a specific result. Furthermore the process of performing an independent re-examination to ascertain whether a given result will be reproduced or not reproduced is a basic tenet of the scientific method, and as such is appropriately stated here. Verification is just one part of a thorough review of work (as promoted by Huber and Ashbaugh). The existing recommendations within this document, in concert with other documents including but not limited to Conflict Resolution and Technical Review, provide a robust template for the desired thorough review of work. As such, the recommendation requested has already been met.
2	4.3	Т	It should not be up to lab discretion when to use non- blind (and this seems to contradict redlined 4.3.1 that lists scenarios in which best practices are non-blind). This is not redlined but our previous comments have not been responded to as far as we can tell in an adjudication provided (apologies if we missed it).	Change to note that blind verification of, at minimum, source identification conclusions is the best practice, and to consult 4.3.1 for other circumstances in which blind should be used.	REJECT - Same or similar comments were reviewed and rejected in the first round of public comments. Same or similar comments were also received in the second round of public comments with commenters referred to the CB approved dispositions of the first round comments involving the same topic area. For reference to relevant CB approved adjucations of comments within this topic area, see the following first round public comments: 2, 14, 18, 37, 38, 58, 59, 63, 66*, 67, 69, 70, 72, 73, 74, 75 [* - most thorough adjucation of the recommended use of blind verification versus open verification]

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5	4.3.1		There is no support that blind is beneficial in these situations.		REJECT - Same or similar comments and resolutions were reviewed and rejected in previous rounds of public review. Please refer to CB approved previous comment resolutions. For reference see first round comment & disposition: Comment - " 4.7.1 there is no evidence that these are the situations where BV is valuable [no recommendation provided] " CB Approved Disposition - "NOTED - These are situations that the discipline has identified as higher risk due to potential for bias; blind verification mitigates bias, therefore it is appropriate to provide guidance here." For further reference see second round comment & disposition: Comment 12 - "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." CB Approved Disposition - "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."
6	5.3		"For blind verification, the verifier should conduct and document an independent examination on unmarked friction ridge impressions." This should be a note because there is no other way to perform a blind examination unless it is on unmarked impressions.	relabel as a note, not a requirement.	REJECT - Notes cannot include recommendation language (i.e., "should" or "shall" statements). The recommendation is appropriate as written.
4			Blind verification does not correct, minimize or prevent nonconforming work.	Ensure concepts work together: nonconforming work, QAM, verification,	REJECT - The full definition of QAM included within the document states "Steps taken by an FSP to <u>detect</u> , correct, minimize and/or prevent nonconforming work." Blind verification is a process by which nonconformity may be detected. How a FSP handles detected nonconformity is outside of the scope of this document. There is no discord with these concepts within this document.