



**AMERICAN SOCIETY
OF
CRIME LABORATORY DIRECTORS, INC.**

139 A Technology Drive Garner, NC 27529

ASCLD Board Comments

Draft Work Product on Root Cause Analysis (RCA) in Forensic Science

The current work product document “**Root Cause Analysis (RCA) in Forensic Science**” is supported by the ASCLD BOD.

For those forensic science service provider’s (FSSP) that are accredited, RCA is a fundamental requirement and ASCLD supports the RCA process to continually improve operations and provide for an objective/structured process to achieve improvements. ASCLD supports universal accreditation for all FSSPs. For those FSSPs not already accredited, the RCA expectation will require a significant investment in training, personnel, etc. either to adopt an RCA or seek accreditation.

Comments:

#1 On p. 2 of 14, under the Documentation bullet point, it states that the learnings from the RCA be made publicly available for the review and benefit of other FSSPs and FSMPs. Please consider that RCA findings could be shared with FFSP and FSMPs without necessarily making them publically available. Public availability to certain groups really defines more of a limited availability. The way it is written it appears that labs may question whether they have to post every single minor corrective action onto their public website. The public is likely to view multiple minor corrective actions as a negative example of a laboratory's capability, when in fact RCA's are genuinely a testament to human nature and the laboratory's ability to engage in the improvement process. Public posting of every action (including level 2 actions), could lead to unintended consequences like making proactive laboratories hesitant to engage in minor corrective actions. Please consider removing the word "publicly" to eliminate this confusion. If this was not the intent, perhaps the word "publicly" could be removed from the bullet point to eliminate confusion.

#2 We would urge that on p 2 of 14, under the bullet point "Proper construction of the investigative team conducting a RCA", the phrase "where resources permit" be added. Proactive laboratories with a single individual in the QA department may be hesitant to address minor corrective actions if they must construct and assemble a team for each level 2. I can understand assembling a team of at least two individuals (or at least a lab director review) for level 1 actions, but smaller proactive QA departments with 1 individual serving overloaded staff may have great difficulty assembling teams for minor level 2 actions.

ASCLD Board Comments – Root Cause Analysis Pg. 2

#3 In the Implementation Recommendations section regarding the last bullet point “Documentation of both the adverse event(s) and the proposed interventions in a manner that does not reveal specific individuals or case information...”

We support making the RCA process non-punitive; however, in order to assess if the adverse event is systemic, it is necessary to document the persons involved. It doesn't benefit the FSSP fully if the RCA documentation is free of such information. An adverse event that needs a RCA most often doesn't lead to discipline, therefore it benefits the FSSP more to have a mechanism to track events in detail to assess whether there are common elements such as the individuals involved or the case specifics.

ASCLD Board of Directors

May 15, 2015