



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

**139 A Technology Drive Garner, NC 27529**

**ASCLD Board Comments**

**Initial Draft Views Document on Report Content V1**

The currently proposed Draft on ***“Report Content”*** lists 5 recommendations, a statement of issue, and background related to report content. The following are specific comments, issues and explanations along with recommended wording, where applicable, to help provide a consensus document:

**Comment #1:** Recommendation #5 (last sentence) - “The “case file” should be organized and made available in a manner consistent with the discovery recommendations of the National Commission on Forensic Science.”

**Issue:** Recently, the National Commission on Forensic Science issued discovery recommendations which contained several key logistical impediments including undefined terminology and unrealistic expectations. The ASCLD Board addressed those issues and provided recommended wording and background for clarification. Unfortunately, it appears the draft version of the discovery recommendation document was adopted without change.

***Recommended change:***

Remove, “The “case file” should be organized and made available in a manner consistent with the discovery recommendations of the National Commission on Forensic Science” until the discovery recommendations are appropriately amended.

**Comment #2:** Recommendation #5 (First 2 sentences) “While it is acceptable to limit the information in the report to less than that which is contained in the “case file”, every report should contain a statement that makes it clear not all the information needed to understand and evaluate all the work performed, and to independently analyze and interpret the data and draw conclusions is contained in the report. Every report should include a statement that to understand and evaluate all the work performed, and to independently analyze and interpret the data and draw conclusions requires a review of the “case file.”

**Issue:** This document correctly acknowledges the “report” will not contain everything in the “case file”. What is the point of putting a statement **in every report** to this effect? There has been recent discussion of the NCFS that reports also need to be clear, concise and understandable to the user. It seems arbitrary to mandate verbiage stating the obvious be added to **every** report.

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**Recommended change:** Make this reporting requirement apply only when the report **does contain** all of the necessary information identified in the document. A statement to this effect accomplishes the same thing.

**Recommendation:** ASCLD supports the increased standardization of scientific reports issued on behalf of FSSPs. As cited in the Views Document, Report Content V1, ISO/IEC: 2005 17025 standards and the amplification standards issued by the main accrediting bodies for FSSPs already require these elements in the “case file”. It is imperative that FSSPs seek accreditation as accreditation already creates the foundation for this standardization across the industry. However, funding will be required for the FSSPs and FSMPs not currently accredited to seek accreditation. Recommendations offered by the Commission should be consistent with the existing accreditation standards as these are universal across multiple industries and are not specific to forensic science.

**Impact:** Adopting the recommendations listed in the Commission’s Views Document on Discovery will have a significant and adverse impact on the FSSP community if implemented as currently written. Whole-scale adoption would necessitate a substantial influx of resources in manpower, information technology, and technical expertise to implement the recommendations. Given the limited amount of resources available to the state and local FSSPs, the testing of evidence in a timely manner would become an unachievable objective for more than a limited number of investigations. Consequently, many investigations would linger creating public safety threats which are highlighted every day in our media. We only have to look to the current issues with the rape kit backlog to identify instances in which limited resources and huge demands for service have created repeat offenders where victims have no recourse for justice.

ASCLD Board of Directors

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