September 28, 2016

Attn: NCFS - Accreditation and Proficiency Testing Subcommittee

The American Society of Crime Laboratory Directors represents more than 600 members of crime laboratory directors and forensic science managers dedicated to providing excellence in forensic science through leadership and innovation. The membership represents both private and public institutions from all 50 states in the U.S. and eighteen countries from across the globe. Our mission is to promote the effectiveness of crime laboratory leaders throughout the world by facilitating communication among members, sharing critical information, providing relevant training, promoting crime laboratory accreditation, and encouraging scientific and managerial excellence in the global forensic science community.

ASCLD is dedicated to advancing forensic science through a multitude of initiatives including the National Commission on Forensic Science. The efforts of the Commission are important and have significant implications for the entire criminal justice community. As a result, the ASCLD Board of Directors offers the following comments, recommendations, and impact statements for consideration by the sub-committee on the “Recommendation to the Attorney General – Accreditation of Digital and Multimedia Evidence Forensic Service Providers”.

ASCLD remains ready to be a continuing resource to assist the Commission and the Department of Justice in the development of these important work products for the forensic science community so that a broader based acceptance and implementation of these products may be realized.

Regards,

ASCLD Board of Directors
ASCLD Board Comments

Recommendation of the Commission: Accreditation of Digital and Multimedia Evidence FSSPs

The American Society of Crime Laboratory Directors has a very long and historic record regarding accreditation from the development of the first crime laboratory accreditation program in the history of the United States in the 1980’s. The program later became the American Society of Crime Laboratory Directors – Laboratory Accreditation Board (ASCLD/LAB). This organization became an independent accrediting body and a recognized industry leader in the accreditation of forensic science service providers (FSSPs) to international standards such as ISO/IEC 17025 and 17020. ASCLD has continued to publicly promote the need for universal accreditation of all forensic science service providers including digital multimedia providers.¹

The ASCLD Board of Directors adamantly supports accreditation of FSSPs and applauds the NCFS for providing this recommendation to the Attorney General. In support of these recommendations, the Board requests the inclusion of these changes and consideration of our comments.

1. Would the NCFS request a status update of the BJA census of FSSPs in the US? This information is invaluable to the community and can provide a better picture when it comes to understanding the service demand of the U.S. criminal justice system and the means through which this demand is met. Additionally, it can inform decision makers regarding funding in support of these efforts especially when it comes to requesting support for federal programs that can fund accreditation activities.

2. ASCLD is a member of the International Forensic Strategic Alliance (IFSA) which is a multilateral partnership between regional networks of operational forensic laboratories across the globe who work strategically with the United Nations Office of Drug Control and Interpol.² Their vision is to create opportunities for strategic collaboration across the global forensic science community. IFSA has developed Minimum Requirements Documents (MRDs) to assist FSSPs who are seeking accreditation. They were originally

¹ ASCLD foundational documents and policy statements regarding the need for universal accreditation can be found at http://www.ascld.org/.
² Additional information regarding IFSA can be found at http://www.ifsa-forensics.org/.
developed for emerging FSSPs in developing countries, but the quality and technical framework needed to seek accreditation is the same regardless of language, border, or economic development. Three MRDs have already been developed and three more are currently in draft including a document specifically for digital multimedia evidence. ASCLD encourages that IFSA’s MRDs be incorporated into the future efforts of the DOJ and the Attorney General in assisting FSSPs to build the framework for a successful accreditation process.

3. The recommendation regarding the appointment of a group to determine best standards and supplemental requirements for accreditation of DME FSSPs seems redundant to other efforts currently underway including the Digital Subcommittee of the Organization of Scientific Area Committees (OSAC) and the ISO Technical Committee (TC) 272 – Forensic Sciences. ASCLD requests that the recommendation be revised to point to these efforts and support of the OSAC and ISO TC272 work products to guide the DME FSSPs.

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3 For information regarding the MRDs please visit http://www.ifsa-forensics.org/minimum-requirements-documents/#.