



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

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

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June 20, 2016

Attn: Accreditation and Proficiency Testing

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 views document "*Accreditation and Recognition of Forensic Science Certification Bodies*".

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



# The American Society of Crime Laboratory Directors

**"Excellence Through Leadership in Forensic Science Management"**

## ASCLD Board Comments

### ***Views of the Commission: Accreditation and Recognition of Forensic Science Certification Bodies***

The ASCLD Board of Directors supports the certification of forensic science professionals. Certification programs in conjunction with laboratory accreditation ensure a robust quality system that encompasses the technical, quality assurance, and managerial aspects of forensic science service providers.

The ASCLD Board of Directors supports the Views of the Commission on the accreditation of forensic science certification bodies to ISO/IEC 17025 standard by an accrediting body operating in accordance with ISO/IEC 17011. The Commission highlights several important points that must be addressed in order to achieve industry compliance. These include the following:

- Increased consistency between certification programs so that all forensic science professionals meet similar thresholds demonstrating their knowledge, skills, and abilities to minimum standards. Additionally, the certification programs need to be geared towards entry level examiners if certification is required for independent casework. Enhanced levels of certification can be added to the programs which demonstrate advanced levels of knowledge, skills, and abilities.
- The development of a general certification program that would evaluate the knowledge, skills, and abilities of forensic science professionals in disciplines with small numbers of practitioners as listed in the Views Document, Appendix B (National Commission on Forensic Science, 2016). This also ensures that all forensic science professionals meet a minimum level of practice within their field.
- Costs for certification must be kept to a minimum as increased certification fees are a deterrent to industry wide adoption and could lead to a reduction in the eligible work force due to the inability of either the forensic science professional or parent organization to pay the increased fees.

Additionally, the ASCLD Board of Directors applauds the Commission's inclusion of Appendix D: *Additional Considerations for Implementation* (National Commission on Forensic Science, 2016). These are significant and will contribute to delays and varied adoption by certification bodies,



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and public/private forensic science service providers for both the individual and the parent organization if they are not addressed.

In particular, the ASCLD Board of Directors is concerned about the HR implications and challenges the mandatory certification requirements will have on parent organizations specific to the Fair Labor Standards Act and its requirements for employers regarding changes to hiring practices, compensation and benefits due to revised minimum job requirements, and conditions of employment contingent on successful certification. Once certified, resources will be required to meet and keep certifications, as well as deal with the personnel implications if an individual fails to maintain certification. Additionally, the ASCLD Board of Directors supports the development of local certification programs through a state or local government agency.

## References

National Commission on Forensic Science. (2016, June 6). *Views of the Commission on Accreditation and Recognition of Forensic Science Accreditation Bodies*. Retrieved from US Department of Justice: <https://www.justice.gov/ncfs/draft-work-products-open-public-comment>