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 “Recommendation on Proficiency Testing”.

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

Views of the Commission: Proficiency Testing

The ASCLD Board of Directors supports proficiency testing of forensic science professionals. Proficiency testing ensures the technical competence, quality assurance, and managerial aspects of forensic science service providers.

The ASCLD Board of Directors supports the Views of the Commission requiring all non-accredited forensic science service providers to also begin implementing proficiency testing in disciplines where proficiency tests are available from external organizations.

The ASCLD Board of Directors would like to recommend the following suggestions to the recommendations given by the commission:

- Recommendation #1: Proficiency testing should be based upon the time when training is completed. A proficiency test should be performed within one year of completion of training not three years as recommended.
- Recommendation #2: Anyone who is performing testing in a forensic capacity (examiners of evidence) should be required to participate in a proficiency testing program. This serves to strengthen each system and show that conformance to standards is being maintained.
- Recommendation #3: no comment
- Recommendation #4: no comment

In general, the recommendations set forth by the Commission are generally agreeable. However, costs for proficiency tests must be kept to a minimum as fees are a deterrent to both accredited and non-accredited forensic science service providers. A determination as to who would be responsible for the enforcement mechanism needs to be determined prior to mandatory proficiency testing. If the proficiency tests could be made by laboratories versus vendors, than the cost for the proficiencies could be kept to a minimum, and there would be a local tracking system in place.
Proficiency tests in conjunction with accreditation and certification ensure a robust quality system. If a proficiency test is taken by any individual performing work in a forensic capacity, then their data should be used and shared. This gives more credence to the strength of the proficiency test and the strength of the laboratory performing the casework.