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 Document Number: Standard 011
 Document Title: Scope of Expertise in Forensic Document Examination

Note: a specific Proposed Resolution must accompany each comment or it cannot be considered.

#	Commenter	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Editor's Review
1	Judith Gustafson	3.1	E	change word order in point (2)	(2) issues test results (remove ",provides reports" and move to later in sentence) , or provides interpretations, conclusions, or opinions through reports or testimony with respect to such evidence.	Reject: This is a direct quote and therefore is not changeable. The reference is footnoted.
2	Emily Will	2	T	<p>Under the list of Normative References is the "SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners."</p> <p>I object to naming and relying upon this SWGDOC document for several reasons. Currently the document has been criticized in the OSAC process. The Legal Research Committee has returned the document to the sub-committee because it lacks specifics about how training would be accomplished and how competence would be evaluated. Essentially it is a laundry list of topics. Also, the Quality Infrastructure Committee has returned the document to the sub-committee because of faulty adjudication of public comments. It is not appropriate to name this document OR include it as a normative reference when it is still considered flawed in a parallel process (OSAC). This would give the document status that it has failed to achieve in the OSAC process.</p> <p>In addition, there is much discussion within the field of recommending major changes to the training paradigm. A modular approach to training is being discussed which would allow trainees to train and demonstrate competence in various modules (areas) of forensic document examination, and to work in those areas without having to complete training and demonstration of competence in all areas. There is also discussion of cross training in forensic fields.</p> <p>For all of these reasons, the SWGDOC document should not be referenced in a potential national standard.</p>	Eliminate SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners from the Normative References section of the document.	<p>Reject: a) This is a normative reference since it is essential to the application of this document. It is specifically cited in Section 4.4.3 Normative references from any source may be used as long as the reference is publicly available. In addition, ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>b) This in itself is inactionable.</p> <p>c) When other approaches are available, they can be considered in future revisions of this document.</p> <p>d) See c)</p> <p>--> The SWGDOC Standard should remain included in the Normative References</p>
3	Emily Will	2	T	<p>Under the list of Normative References is the "SWGDOC Terminology Relating to the Examination of Questioned Documents"</p> <p>Normative References and their definition by ISO are discussed in this article: http://www.insidestandards.com/iso-90002015-whats-normative-anyway/ The definition is: ISO/IEC Directives, Part two, Section 6.2.2, defines the inclusion of a normative reference as, "This conditional element shall give a list of the referenced documents... in such a way as to make them indispensable for the application of the document." In other words, by citing ISO 9000:2015 as a normative reference, it is therefore considered as indispensable to the application of ISO 9001.</p> <p>The SWGDOC Terminology Relating to the Examination of Questioned Documents is a list of terminology that might be used by an FDE in describing handwriting, but it has nothing to do with the Scope of Work document that is under consideration here, and it is certainly not "indispensable." This document should NOT be listed as a normative reference.</p>	Delete this document as a Normative Reference	<p>Reject: The development of this document follows ASB and ANSI rules and is not subject to ISO requirements.</p> <p>This document uses the terms defined in the SWGDOC terminology document, as is stated in Section 3. Therefore, it is rightfully a normative reference. Examples of such terms used in this standard that are taken directly from the SWGDOC terminology document are: Indentations (Section 4.2.2 and 4.3.2);</p>

4	Emily Will	4.2.2.	T	<p>"For examinations such as those in 4.2.1, the forensic document examiner can perform various tasks including:"</p> <p>Comment The list in 4.2.1 is an inclusive list, but it should not be misunderstood to mean that all FDEs conduct all of these examinations in their daily work. Laboratories routinely conduct different types of examinations, and some laboratories routinely refer other types of examinations to specialists. Additionally there is discussion in the field at this time regarding modular training that will allow examiners to demonstrate competence in a particular area and then working that area while acquiring competence in other modular areas. For example, an expert might acquire expertise in handwriting examination, demonstrate competence, and work in handwriting examination without having completed training in or demonstrated competence in typewriter examination.</p>	Change the wording to: For examinations such as those in 4.2.1, the forensic document examiner MAY perform various tasks including:	<p>Reject: ASB definition of May is: The provision is optional ASB definition of Can is: Used for statements of possibility or capability Having knowledge of all of these areas is necessary for a qualified forensic document examiner. Having only limited knowledge of some of these areas is insufficient preparation.</p>
5	Emily Will	4.3.2.	T	<p>"The following equipment, tools, instrumentation, and reference materials are required for forensic document examinations in the most frequently encountered problems, and shall be accessible at all times."</p> <p>Comment The term, "most frequently encountered problems" may be laboratory dependent, and "accessible at all times" is an exaggerated requirement when there is no statement about "relevance" to the examination at hand. For example, if an examiner goes to a attorney's office to see an original Mortgage document which been questioned as to whether it is an original or copied document, it is not necessary to take along an ESDA device unless there additional question related to indented writing issues.</p>	<p>Change text to:</p> <p>The following equipment, tools, instrumentation, and reference materials are required for forensic document examinations in many frequently encountered problems, and shall be accessible as appropriate to the examinations being conducted.</p>	<p>a) Partial Accept: eliminated "most frequently encountered problems"</p> <p>b) Reject: "as appropriate to the examinations being conducted." The equipment listed shall be available for all cases. Section 4.5 requires that an examiner document why this would not have occurred, contrary to acceptable practice.</p> <p>4.3.2 change "accessible" to "available"</p> <p>Change Conformance to 4.3: "Conformance to 4.3 Equipment requires that the forensic document examiner shall ensure that all equipment and apparatus is properly maintained and calibrated (4.3.1) and maintain the documentation. The forensic document examiner shall also demonstrate that the Standard Equipment (4.3.2) is always accessible and useable and that the Special Equipment (4.3.3) is accessible and useable upon demand for any examinations that the laboratory or individual forensic document examiner may agree to undertake."</p>
6	Emily Will	4.3.3.	T	<p>"Certain equipment, tools, instrumentation, and reference materials are required for less frequently encountered problems or advanced examinations. Where standard procedures exist for such examinations, the required equipment is generally specified.</p> <p>Other analytical instrumentation may be used where appropriate. Examiners should understand each technique's capabilities and limitations."</p> <p>Comment This section is good, but is also confusing and lacks usefulness due to the lack of examples of what would be considered "less frequently encountered problems or advanced examinations."</p>	<p>Change text to:</p> <p>Certain equipment, tools, instrumentation, and reference materials are required for less frequently encountered problems or advanced examinations, such as examination of water soaked or charred documents. Where standard procedures exist for such examinations, the required equipment is generally specified.</p> <p>Other analytical instrumentation may be used where appropriate. Examiners should understand each technique's capabilities and limitations.</p>	<p>Partial accept: Insert after 'generally specified': " (e.g., Annex C lists the standard procedures developed by SWGDOC for a wide variety of case types.)" This addresses the issue of standard procedures existing and being followed for cases such as soaked or charred documents.</p>

7	Emily Will	4.4.3 - paragraph 1	T	<p>"The examiner's training shall conform to the requirements of SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners."</p> <p>Comments</p> <p>I object to naming and relying upon this SWGDOC document for several reasons. Currently the document has been criticized in the OSAC process. The Legal Research Committee has returned the document to the sub-committee because it lack specifics about how training was to be accomplished and how competence was to be evaluated. Essentially it is a laundry list of topics. Also, the Quality Infrastructure Committee has returned the document to the sub-committee because of faulty adjudication of public comments. It is not appropriate to name this document OR include it as a normative reference when it is still considered flawed in a parallel process (OSAC). This is a blatant attempt to give the document status that it has failed to achieve in the OSAC process.</p> <p>In addition, there is much discussion within the field of recommending major changes to the training para-digm. A modular approach to training is being discussed which would allow trainees to train and demonstrate competence in various modules (areas) of forensic document examination, and to work in those areas without having to complete training and demonstration of competence in all areas. There is also discussion of cross training in forensic fields.</p>	Omit this paragraph	<p>Reject:</p> <p>The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>This is a normative reference since it is essential to the application of this document.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC document is the most appropriate document to reference.</p> <p>b) This in itself is inactionable.</p> <p>c) When other approaches are available, they can be considered in future revisions of this document.</p> <p>d) See c)</p> <p>--> The SWGDOC Standard should remain included in the Normative References</p>
8	Emily Will	4.4.3 - paragraph 3	T	<p>"Other kinds of experience and training do not constitute expertise or training in whole or in part in forensic document examination (e.g., calligraphy, penmanship, personality profiling or character assessment based on handwriting, fraud investigation, law enforcement, loss prevention, banking, general criminalistics or other forensic disciplines, legal training, or laboratory management)."</p> <p>Comments</p> <p>This paragraph is directly contradicted by the SWG DOC Training Standard that is currently included in the Normative References Section of the standard. In that document is the following text:</p> <p>NOTE 1—Although attending meetings and presentations is useful as supplemental training, it does not replace the training outlined in Section 7 of this standard. However, the principal trainer may grant credit to the trainee for knowledge (as in accordance with Section 7) acquired at such meetings and presentations.</p> <p>and</p> <p>6.1.3 The principal trainer may grant credit for prior training or experience in Section 7 subject areas when the trainee can demonstrate and document such training or experience.</p> <p>So, for example, a trainee might have had coursework and training in Photography and might be given credit for that towards hours of training in that topic. Or, a trainee might have training legal training or training in other forensic disciplines which would inform the trainee about topics such as forensic report writing, courtroom procedures, Daubert questions, and a multitude of other types of training. With current concerns about budgeting in laboratories there are discussions afoot about cross-training of forensic experts. It is entirely unreasonable to take the stance stated in 4.3.3 that "Other kinds of experience and training do not constitute expertise of training in whole or in part in forensic document examination" and then paint with such a broad brush.</p>	Suggest changing the text of this paragraph to read: Prior relevant documented experience and training can be credited in the FDE training program on a case-by-case basis.	<p>Reject:</p> <p>Section 7.1 of the SWGDOC Training Standard is specific for the topics that may be granted credit, including photography. Section 4.4.3 specifically lists areas that are not applicable for credit in forensic document examiner training.</p>
9	Emily Will	5.1.	T	<p>"Conformance to this standard will be achieved if an implementation and its associated data records conform to normative ("shall") Sections 4.3 through 4.4. Documentation to verify conformance with the above requirements shall be maintained by the laboratory or individual forensic document examiner and shall be made available to auditors upon request."</p> <p>Comment</p> <p>"Auditor" needs to be defined to eliminated.</p>	Eliminate the phrase "and shall be made available to auditors upon request" or define the term auditors".	Partial accept: Change "auditors' upon request" to "upon judicially or administratively authorized request."

10	Emily Will	5.1.2.	T	<p>"Conformance to 4.4 Competence requires the laboratory or individual forensic document examiner to maintain and supply evidence of technical competence (e.g., by maintaining appropriate training records, participating in inter-laboratory comparison, individual proficiency testing, and by demonstrating laboratory accreditation or individual certification by a recognized accreditation or certification body)."</p> <p>Comment This parenthetical is a laundry list of requirements produced with no empirical data to support these requirements. Also, there is no definition of "recognized." These are major concepts that are slipped into this document where they do not necessarily belong, and they go beyond the document's scope of "general qualifications."</p>	Delete the parenthetical statements.	<p>a) Reject: The Codes in the Normative references supports these conclusions.</p> <p>b) Reject: In the opinion of the CB the current language using "recognized" is acceptable.</p> <p>c) Reject: The document scope is specified in Section 1, which includes the responsibilities of the examiner.</p>
11	Emily Will	Annex A	T	<p>This paragraph seems somewhat duplicative of the introductory paragraph at the start of the document. But it also seems very unfinished. What is it supposed to be? Are there supposed to be some Principles listed here. Commenters should have the opportunity to comment on the completed document.</p>	Delete Annex A, or complete the text and send this document out for more comments once it is completed.	<p>Reject: Annex A is required for all ASB standards and Best Practice Recommendations.</p> <p>Annex A is required by the AAFS Standards Board as a partial response to the criticisms laid out in the 2009 National Academy of Sciences report "Strengthening Forensic Science in the United States: A Path Forward." That report stated: "Two very important questions should underlie the law's admission of and reliance upon forensic evidence in criminal trials: (1) the extent to which a particular forensic discipline is founded on a reliable scientific methodology that gives it the capacity to accurately analyze evidence and report findings and (2) the extent to which practitioners in a particular forensic discipline rely on human interpretation that could be tainted by error, the threat of bias, or the absence of sound operational procedures and robust performance standards."</p> <p>--> No change needed.</p>
12	Emily Will	Annex C	T	<p>This annex of a Bibliography and a list of SWGDOC documents has no place in a Scope of Work document. It should either be eliminated, or the SWGDOC documents should be removed and the rest of the list up-dated. Many excellent references, such as the book on Neuroscience by Mohammad and Caligiuri, the book on digital forensics by Harralson, and the update of Huber and Hedrick by Harralson and Miller, have been omitted. Also journals such as the ASQDE Journal and the Journal of Forensic Document Examination have also been omitted. Anyone looking at the list would think that nothing new is happening in our field.</p>	Either delete the annex, or delete the SWGDOC documents and add in the works suggested in the Comment section.	<p>a) Reject. See b)</p> <p>b) Reject. These SWGDOC documents are included specifically to document the accepted procedures for particular aspects of forensic document examination. See section Section 4.3.3 as modified.</p> <p>c) Reject. The CB has reviewed the documents recommended and do not agree that they are fundamental to the field.</p> <p>d) Reject. Specific articles may be referenced. Entire journals may include excellent and mediocre articles and are thus not cited.</p>
13	Kareem Belt - Innocence Project	2	E	<p>The incorporation of the recommended version of the National Code of Professional Responsibility for Forensic Science and Forensic Medicine Providers issued by the National Commission on Forensic Science into this standard is something that should be applauded.</p>		Non-actionable comment
14	Kareem Belt - Innocence Project	2	E	<p>It is unclear why the SWGDOC <i>Standard Terminology for Expressing Conclusions</i> was omitted as a normative reference.</p>	The standard should be added as a normative reference.	Reject: The SWGDOC document is not required to be used in order to implement the requirements of this standard. As such, it cannot be a Normative reference and is instead included in the Bibliography.
15	Kareem Belt - Innocence Project	3	E	<p>It is unclear why the SWGDOC <i>Standard Terminology for Expressing Conclusions</i> was omitted as a reference.</p>	The standard should be added as a reference.	Reject: The SWGDOC document is not required to be used in order to implement the requirements of this standard. As such, it cannot be a Normative reference and is instead included in the Bibliography.

16	Kareem Belt - Innocence Project	4.4.1	E	If forensic document examiners do not practice personality profiling or character assessment, the language distinguishing between those practices and the job of a forensic document examiner should be stronger. Simply stating that personality profiling or character assessment is not a foundation in whole or in part for document examination does not make sufficiently clear that there is no scientific support for such analyses, and accordingly, forensic document examiners do not partake in such practices.	Use stronger language to discourage / prohibit personality profiling or character assessment by forensic document examiners.	Partial Accept: Wording added to strengthen the section. The study or practice of personality profiling or character assessment based on handwriting is not a foundation or a supplement, in whole or in part, for competence in the practice of forensic document examination.
17	Kareem Belt - Innocence Project	4.4.1	T	Section 4.3 discusses the equipment used for document examination. Section 4.4 does not clearly convey that examiners should be knowledgeable of the scientific grounding for all of the technology they employ.	Additions to 4.4.2 and/or 4.4.3 can address that coursework and training can/will provide a strong foundation in the scientific principles guiding the use of equipment used for document examination.	Reject: These issues are appropriately addressed in 4.3.1 by the added requirement that "Examiners shall understand each technique's capabilities and limitations." Also normative reference for training in 4.4.3: SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners, 2013-1
18	Kareem Belt - Innocence Project	4.4.2	T	The description for requisite knowledge, skills, and abilities needs further clarification. The SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners states that a training candidate needs to have a degree or equivalent from an accredited university, completed a form discrimination test, completed a color perception test, and completed a near and distant visual acuity with best corrected vision test. The standard does not clearly convey the requirement of having a knowledge base that includes the manufacturing processes of materials used in the production and preservation of documents as well as the skills and abilities to analyze, compare, and evaluate case-related items. To provide better guidance on obtaining an education on the manufacturing process, the standard should address the following: (1) where would one obtain the requisite knowledge, skills, and ability, (2) how one would provide proof of such information and ability, (3) whether these tests are similar to those outlined in the Minimum Training standard that addresses these requirements, and (4) whether a knowledge of statistics is a requirement that falls into this category.	Make an addition to Annex A or create a new annex which provides examples of the requisite knowledge, skills, and abilities one would need to have and what type of proof would support such information and ability.	Partial Accept: The requisite KSAs are described in various sections of 4, as modified. Regarding "proof" 5.1.2 has been modified as follows: Conformance to 4.4 Competence requires the laboratory or individual forensic document examiner to maintain and supply evidence of technical competence (e.g., by maintaining records of completion of training to competence, including initial training, continuing education, and training on specific equipment; participating in inter-laboratory comparison; individual proficiency testing; and by demonstrating laboratory accreditation or individual certification by a recognized accreditation or certification body).
19	Kareem Belt - Innocence Project	4.5	E	Clearly reporting results in an unbiased manner does not accurately convey that examiners must state the basis for their findings, opinions, and conclusions, including sources of error and uncertainty.	The statement can be edited to require that examiners clearly report examinations, procedures, and results in an unbiased manner, and that the reporting should include limitations and rates of error.	Reject: Largely covered in the normative reference NCFE National Code #12: 12. Prepare reports and testify using clear and straightforward terminology, clearly distinguishing data from interpretations, opinions, and conclusions and disclosing known limitations that are necessary to understand the significance of the findings. or in the normative reference USDOJ Code of Professional Responsibility #12: 12. Prepare reports and testify using clear and straightforward terminology, clearly distinguishing data from interpretations, opinions, and conclusions and disclosing. Reports should disclose known limitations that are necessary to understand the significance of the findings.

20	Kareem Belt - Innocence Project	4.5	E	The terms competency and proficiency are used interchangeably despite the fact that competency tests and proficiency tests have a different meaning in forensic science and it doesn't make sense to conflate the two ideas in a standard. This section should explicitly state that examiners are required to participate in appropriate proficiency testing and not just mentioned as an example in 5.1.2.	Edit this section to require participation in appropriate training and competency testing to include proficiency testing.	Partial Accept: Eliminate the single use of "proficiency" in 4.3.1. Change from "Competency in forensic document examination includes knowledge of, access to, and proficiency in the use of the equipment, tools, instrumentation, and reference materials used for examination." To "Competency in forensic document examination includes the requisite knowledge, skills, and abilities in the use of, and access to, the equipment, tools, instrumentation, and reference materials used for examination."
21	Patricia Fisher	2	Editorial/Technical	Delete reference to SWGDOC standards	The SWGDOC standards are not consensus standards at this time and the training standard is still under review by at least two OSAC related committees. Therefore, it is premature to make the training standard a normative standard until the vetting process has been completed and the recommendations have been implemented and approved. In addition, the training standard needs revisions and the modular system under review needs to be completed. Overall the standard needs to be updated to meet today's challenges for document examiners.	Reject: There is no requirement that references be consensus standards. The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations. The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document. Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC document is the most appropriate documents to reference. When other approaches are available, they can be considered in future revisions of this document.
22	Patricia Fisher	4.2.2	Technical	Delete all items after the third and sixth ones as they are too specific compared to the first three that are more appropriate for the Scope. The "decipherment of machine ribbons" is now antiquated and can be included in the curriculum, but not the scope. Realistically, how many laboratories are collecting and preserving charred and watersoaked documents? This is the type of case that unless you are doing it frequently is best referred to specialists. My suggestion is to add a fifth category to read:	The analysis of testing, preparation of reports, and testimony as required.	Partial Accept: Change to "–the comparison of print outs and other output to machine ribbons" to include ribbon printers of ID badges, etc. Add "– preparation of reports and associated illustrative material"

23	Patricia Fisher	4.4.3	Technical	Delete this section.	References to SWGDOC standards are inappropriate until they become consensus standards and the OSAC vetting process is completed.	<p>Reject: There is no requirement that references be consensus standards.</p> <p>The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference.</p> <p>The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>When other approaches are available, they can be considered in future revisions of this document.</p>
24	Patricia Fisher	5.1	Technical	Delete this section.	There is no point in conforming to a flawed training standard that has not been completely vetted by the OSAC committees and revised as needed. The Scope for forensic document examiners needs to be more general rather than going into the degree of specifics stated in this version. If section 5 is a requirement, my suggestion would be to make a more generalized statement:	<p>Reject: The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC document is the most appropriate document to reference.</p> <p>When other approaches are available, they can be considered in future revisions of this document.</p>
25	Patricia Fisher	Bibliography	Editorial/Technical	For now, delete the bibliography	The bibliography is outdated and incomplete. The SWGDOC standards are not consensus standards at this time and still need to go through the vetting process by the OSAC committees.	<p>Reject: There is no requirement that references be consensus standards.</p> <p>Normative and other references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference.</p> <p>The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p>

26	Andrew Sulner	Foreword	E/T	<p>This proposed standard is a derivative of the ASTM voluntary consensus standard published as ASTM E444, the only consensus standard ever published on this topic. Accordingly, it is the only publication that can properly be cited as a source reference. The so-called "2013 SWGDQC edition" that was submitted to OSAC was substantially a verbatim duplication of the language contained in the latest published version of ASTM E444, a published consensus standard which can be and still is used and available for purchase through ASTM. A very large group of FDEs not affiliated with SWGDQC made significant contributions to drafting and developing the language of ASTM E-444, as published; it is false and misleading to source it to SWGDQC alone.</p> <p><i>Note 1: SWGDQC is not an ANSI-approved standards development organization ("SDO"); it is a private coalition of FDEs, almost all of whom are current or former employees of the government agencies that provided them with on-the-job training in forensic document examination.</i></p>	<p>Remove any reference to Alwyn Cole, ASQDE or SWGDQC. The only appropriate source reference is to ASTM E444, which was a consensus standard published by ASTM, a recognized voluntary consensus SDO.</p>	<p>Partial Accept with editorial modification: Text added: "The updates over the years, the final version, which became the 2013 edition" Numerous SWGDQC documents are cited throughout this document and listed in Annex C, Bibliography. These SWGDQC documents are currently publicly available without charge.</p>
27-1	Andrew Sulner	2	T	<p>1/2 Two references are improperly listed as "normative references": (a) SWGDQC Terminology Relating to the Examination of Questioned Documents; and (b) SWGDQC Standard for Minimum Training Requirements for Forensic Document Examiners First, these two SWGDQC references are not "normative references" for purposes of ISO-compliant documents. SWGDQC is not an ANSI-approved SDO nor are any of its documents registered with ISO. The subheading "Normative References" may be required in an ISO standard, but nothing need be listed under the heading if there is no appropriate normative reference. Second, in the June 8, 2017 web/telephonic meeting of the QD Consensus Body ["QD CB"] of ASB, Chair Rigo Vargas stated that the SWGDQC Standard for Minimum Training Requirements for Forensic Document Examiners had been the subject of criticism by several OSAC oversight committees, including the Legal Resource Committee, and that this very same document was returned to the QD CB because it lacked specificity about how training would be accomplished and how competence would be evaluated.</p>	<p>Eliminate the two SWGDQC documents and have nothing listed under "Normative References." If there is to be a "References" section (not "Normative References"), it would only be appropriate to list the two ASTM-published consensus standards as the source references: (a) ASTM E2195 Standard Terminology Relating to the Examination of Questioned Documents and (b) ASTM E2388 Standard Guide for Minimum Training Requirements for Forensic Document Examiners</p>	<p>Reject: These are normative references since they are essential to the application of this document essential to the application of this document. This document uses the terms defined in the SWGDQC terminology document, as is stated in Section 3. Therefore, it is rightfully a normative reference. Examples of such terms used in this standard that are taken directly from the SWGDQC terminology document are: Indentations (Section 4.2.2 and 4.3.2); The training document is specifically cited in Section 4.4.3 The development of this document follows ASB and ANSI rules and is not subject to ISO requirements. Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDQC documents are the most appropriate documents to reference. The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p>

27-2	Andrew Sulner	2	T	<p>2/2 It is not appropriate to reference this document when it is still considered flawed by OSAC's more meaningful standards development process, whose very purpose was to "vet" proposed standards before they are submitted to an ANSI-approved SDO such as ASB. The submission of this standard to ASB is nothing more than a blatant end run by SWGDOC to avoid having to deal with the harsh criticisms that have been leveled against the content of this standard by a much wider and diverse group of interested stakeholders entrusted by OSAC with the task of objectively reviewing the merits of proposed forensic standards.</p> <p>There is no legitimate basis for referencing SWGDOC documents in a potential national standard. SWGDOC standards are not true consensus standards and are not developed through an ANSI-approved SDO – they are standards developed by a small, inner circle of people who do not represent ALL the relevant and legitimate stakeholder interests significantly affected by the proposed standard.</p> <p>Finally, the jury is still out on what constitutes an appropriate training paradigm. Both NIST and the AAAS have found significant flaws in FDE training methods traditionally utilized in the public and private sector. Significant changes to the current training paradigm have been recommended which, if implemented, would place greater emphasis on validated competency testing.</p> <p>This SWGDOC training document should never have been presented to ASB and should be "shelved" pending the outcome of OSAC's ongoing review of same.</p>	See above	<p>Reject: The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>There is no requirement that references be consensus standards. Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference.</p> <p>The development of this document follows ASB and ANSI rules and is not subject to ISO requirements.</p> <p>The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document.</p> <p>When other approaches are available, they can be considered in future revisions of this document.</p>
28	Andrew Sulner	3	T	<p>This section once again improperly reference a SWGDOC document: SWGDOC Terminology Relating to the Examination of Questioned Documents</p> <p>There is no legitimate basis for referencing SWGDOC documents in a potential national standard. SWGDOC standards are not true consensus standards developed through an ANSI-approved SDO – they are standards developed by a small, inner circle of people who do not represent all relevant stakeholder interests.</p> <p>Moreover, ISO guidelines provide that the Terms and Definitions section is for "clarifying the meaning of certain words in the context of the document," and that "[o]nly terms which are used in the document shall be defined." The referenced SWGDOC document defines terms that are used to describe specific handwriting features, none of which are relevant to a description of the scope of work of a forensic document examiner, which is why no such terms are even encountered in the text of this proposed standard.</p>	Remove any reference to the SWGDOC document titled Terminology Relating to the Examination of Questioned Documents.	<p>Reject: There is no requirement that references be consensus standards.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC document is the most appropriate document to reference.</p> <p>This document uses the terms defined in the SWGDOC terminology document, as is stated in Section 3. Therefore, it is rightfully a normative reference. Examples of such terms used in this standard that are taken directly from the SWGDOC terminology document are: Indentations (Section 4.2.2 and 4.3.2);</p> <p>The development of this document follows ASB and ANSI rules and is not subject to ISO requirements.</p>

29	Andrew Sulner	4.2.1	T	<p>The forensic document examiner conducts examinations and other tasks to provide information and opinions regarding documents, including:</p> <ul style="list-style-type: none"> - source(s) of handwriting; - source(s) of machine-produced documents; - source(s) of typewriting, impressions and marks - associations of materials and devices used to produce documents - establishing or refuting genuineness and authenticity; - detection and decipherment of alterations and obliterations; and - preservation and restoration of legibility to damaged or illegible documents <p>Change "include" in the introductory sentence to "which may include" so that the seven (7) tasks listed under 4.2.1 are not misunderstood as constituting tasks that FDEs routinely perform in their daily work. For example, most FDEs, especially all those working in the private sector, are rarely called upon to preserve and restore the legibility to damaged or illegible documents.</p> <p>Tasks such as restoring charred or water-soaked documents, or authenticating passports or other government security documents are generally performed only by a small subset of public sector examiners working in certain federal or state agencies.</p> <p>In fact, private sector FDEs and even many public sector FDE laboratories routinely conduct different types of examinations, and often refer or subcontract certain tasks to specialists who possess superior task skills for performing certain tasks or examinations, such as chemical ink or paper dating, or restoration of charred or liquid-soaked documents.</p>	<p>1. Change "including" to "which may include" in the lead-in sentence of 4.2.1</p> <p>2. Insert "establishing or refuting" before "genuineness and authenticity" in the 5th task listed</p>	<p>1) Reject: The use of "may" is restricted in writing standards to giving permission to a person performing an action. The text cannot give permission to an inanimate list.</p> <p>As used here "including" introduces a nonrestrictive list. This list of 7 specific items could easily be expanded to include the many other tasks that the FDE might perform.</p> <p>Any problem can require additional input or services. Even if material is sent elsewhere, the FDE still has the responsibility of conducting an initial examination that appropriately applies reliable methodologies that lead to a referral elsewhere. Limitations on examinations that can be performed without specialized equipment or advanced training are set out in the appropriate task specific standards.</p> <p>2) the use of "information and opinions regarding" in the introductory paragraph applies equally to all bullet point topics. The binary choice of "establishing or refuting" would unduly limit the examination and report on this and any other bullet point topic.</p> <p>In the opinion of the CB the current language is preferable.</p>
30	Andrew Sulner	4.2.2	T	<p>For examinations such as those in 4.2.1, the forensic document examiner can may, if competent to do so, perform various tasks including:</p> <p>Replace "can" in the introductory sentence of 4.2.2. with "may, if competent to do so," so that the ten (10) tasks listed under 4.2.2 are not misunderstood as constituting tasks that FDEs routinely perform in their daily work or must be competent to perform. Some of the tasks listed in 4.2.2 are often referred to a specialist whose task skills are superior and optimal for a given task, such as "the collection and preservation of charred or liquid-soaked documents" (listed last in the list of tasks under 4.2.2), a problem that is rarely encountered in routine FDE casework. Similarly, although nondestructive differential ink analysis is routinely encountered, destructive chemical ink testing is another task invariably referred to a forensic ink chemist or an FDE with specialized training and experience in performing chemical ink dating tests.</p>	<p>Change "can" to "may, if competent to do so," in lead-in sentence of 4.2.2</p>	<p>Reject:</p> <p>ASB definition of May is: The provision is optional</p> <p>ASB definition of Can is: Used for statements of possibility or capability</p> <p>Can is used appropriately as these are possible examinations to be performed.</p> <p>The issue of competence is addressed in the modified language in 4.2.1.</p>
31	Andrew Sulner	4.3.2	T	<p>The following equipment, tools, instrumentation, and reference materials are required for forensic document examinations in the most frequently encountered problems, and shall be accessible at all times, as needed.</p> <p>The descriptive phrase, "the most frequently encountered problems," is unnecessarily broad for purposes of this introductory statement, and in fact, may be an inaccurate description for some laboratories and practices</p> <p>Similarly, requiring that the standard equipment described in section 4.3.2. be "accessible at all times" is an obvious overstatement that is unwarranted.</p>	<p>Delete "the most" and replace "at all times" with "as needed" so that the revised sentence reads:</p> <p>The following equipment, tools, instrumentation, and reference materials are required for forensic document examinations in frequently encountered problems, and shall be accessible, as needed.</p>	<p>1) Partial Accept: Deleted "in the most frequently encountered problems,"</p> <p>2) The CB feels that basic equipment is always needed.</p>
32	Andrew Sulner	4.3.3	T	<p>Certain equipment, tools, instrumentation, and reference materials are required for less frequently encountered problems or advanced examinations. Where standard procedures exist for such examinations, the required equipment is generally specified.</p> <p>Other analytical instrumentation may be used where appropriate. Examiners should understand each technique's capabilities and limitations.</p> <p>Given that Section 4.3.2 provides examples of the more frequently encountered problems encountered by FDEs, it would be useful if this section 4.3.3 offered some examples of what constitutes "less frequently encountered problems or advanced examinations."</p>	<p>List some examples of "less frequently encountered problems or advanced examinations" to provide clarity to the reader.</p>	<p>Partial Accept:</p> <p>Added reference to the specific SWGDOC standards in Annex C</p>

33-1	Andrew Sulner	4.4.3 Paragraph 1	T	<p>1/2 The examiner's training shall conform to the requirements of SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners.</p> <p>This one-sentence paragraph referencing the SWGDOC training document should be omitted from 4.4.3 for the same reasons outlined above with respect to eliminating any reference to the SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners documents.</p> <p>As noted above, the SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners has been the subject of criticism by several OSAC oversight committees, including the Legal Resource Committee, and this very same document was returned to the QD CB because it lacked specificity about how training would be accomplished and how competence would be evaluated.</p> <p>It is not appropriate to reference this document when it is still considered flawed by OSAC's more meaningful standards development process, whose very purpose was to "vet" proposed standards before they are submitted to an ANSI-approved SDO such as ASB. The submission of this standard to ASB is nothing more than a blatant end run by SWGDOC to avoid having to deal with the harsh criticisms that have been leveled against the content of this standard by a much wider and diverse group of interested stakeholders entrusted by OSAC with the task of objectively reviewing the merits of proposed forensic standards.</p>	Omit this paragraph from 4.4.3.	<p>Reject: There is no requirement that references be consensus standards.</p> <p>The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference.</p> <p>The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>When other approaches are available, they can be considered in future revisions of this document.</p>
33-2	Andrew Sulner	4.4.3 Paragraph 1	T	<p>2/2 There is no legitimate basis for referencing SWGDOC documents in a potential national standard. SWGDOC standards are not true consensus standards and are not developed through an ANSI-approved SDO – they are standards developed by a small, inner circle of people who do not represent ALL the relevant and legitimate stakeholder interests significantly affected by the proposed standard.</p> <p>Finally, the jury is still out on what constitutes an appropriate training paradigm. Both NIST and the AAAS have found significant flaws in FDE training methods traditionally utilized in the public and private sector. Significant changes to the current training paradigm have been recommended which, if implemented, would place greater emphasis on validated competency testing.</p> <p>This SWGDOC training document should never have been presented to ASB and should be "shelved" pending the outcome of OSAC's ongoing review of same.</p>	See above	<p>Reject: There is no requirement that references be consensus standards.</p> <p>The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference.</p> <p>When other approaches are available, they can be considered in future revisions of this document.</p> <p>The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p>

34	Andrew Sulner	4.4.3 Paragraph 3	T	<p>This paragraph takes an unreasonably harsh and arbitrary stance that directly contradicts two critical statements contained in the SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners (the "SWGDOC Training Standard") that this proposed standard seeks to anoint as a "Normative Reference."</p> <p>1. NOTE 1 of the SWGDOC Training Standard provides: <i>Although attending meetings and presentations is useful as supplemental training, it does not replace the training outlined in Section 7 of this standard. However, the principal trainer may grant credit to the trainee for knowledge (as in accordance with Section 7) acquired at such meetings and presentations.</i></p> <p>2. Section 6.1.3 of the SWGDOC Training Standard provides: <i>The principal trainer may grant credit for prior training or experience in Section 7 subject areas when the trainee can demonstrate and document such training or experience.</i></p> <p>There is absolutely no logical reason why someone whose prior education, training, or work experience in a field or discipline other than FDE cannot receive credit for such prior experience if it enabled the individual to achieve competency (mastery) with respect to one or more topic areas or skill tasks required of FDE trainees, and such competency can be measured by a valid competency test. This is not a foreign concept to specialists in the fields of education and professional training, who would never condone the inflexible stance taken in paragraph 1 of section 4.4.3 of this proposed standard.</p>	<p>I would recommend replacing this paragraph with the following:</p> <p>A trainee's prior relevant d experience can qualify for credit in a FDE training program on a case-by-case basis provided such experience is properly documented and the task-specific FDE skills associated with such prior experience are subjected to valid competency testing.</p>	<p>Reject</p> <p>The proposed resolution addresses details of individual training programs and specific case-by-case decisions that are beyond the scope of this document and at best would relate to supplementary enrichment for initial training or for continuing professional development.</p>
35	Andrew Sulner	4.5	T	<p>The forensic document examiner shall perform the following or document the reason(s) for not performing the action:</p> <p>- preserve potentially relevant physical evidence present on a document(s) for examination by other forensic document examiners as well as forensic examiners of other disciplines;</p> <p>Include other FDEs in this 6th listed item under 4.5. This is important for case work reviews by other FDEs.</p>	<p>Add "other forensic document examiners as well as" before "forensic examiners of other disciplines;"</p>	<p>Accept</p> <p>Specific line deleted in rewriting 4.5</p>
36	Andrew Sulner	5.1	T	<p>Documentation to verify conformance with the above requirements shall be maintained by the every every laboratory or and every individual forensic document examiner and such documentation shall be made available to auditors upon request.</p> <p>1. Change the subject sentence about documentation so that every laboratory and every individual FDE is required to maintain such documentation and produce it for inspection by "auditors" (an appropriate administrative demand)</p> <p>Note: Every laboratory and every individual FDE, whether working in the public sector or in the private sector, should be obligated to maintain such documentation and produce it upon receiving an appropriate administrative or legal demand to produce same for inspection. The interests of justice require nothing less.</p> <p>2. The term "auditors" needs to be defined.</p>	<p>1. Change the subject sentence (as indicated by the yellow highlighted text at the far left) so that it reads: Documentation to verify conformance with the above requirements shall be maintained by every laboratory and every individual forensic document examiner and such documentation shall be made available to auditors upon request.</p> <p>2. Define "auditors"</p>	<p>Partial Accept:</p> <p>Add "each" for "each laboratory or individual ..." "auditor" is a generally accepted term, In this context it is clear that it relates to conformance assessment.</p>
37	Andrew Sulner	5.1.2	T	<p>Competence requires the laboratory or individual forensic document examiner to maintain and supply evidence of technical competence (e.g., by maintaining appropriate training records, participating in interlaboratory comparison, individual proficiency testing, and by demonstrating laboratory accreditation or individual certification by a recognized accreditation or certification body).</p> <p>The highlighted illustrative parenthetical lists several unspecified requirements, each of which is ambiguous, and lacks any empirical support; similarly, the term "recognized" is not defined.</p> <p>These so-called "requirements" are nothing more than generalized propositions without substance or specifications, and as such, should be deleted.</p> <p>A sentence should be added that states: <i>Technical competence should be measured by validated competency testing.</i></p>	<p>Delete the parenthetical text in its entirety.</p> <p>A sentence should be added that states: <i>Technical competence should be measured by validated competency testing.</i></p>	<p>Reject:</p> <p>The CB considers that the current wording as modified is appropriate.</p>

38	Andrew Sulner	Annex A	T	This Annex, titled "Foundational Principles" serves no purpose because it does not address the all-important and controversial issues surrounding the foundational principles or tenets of forensic handwriting analysis. The two sentences included in this Annex A are simply redundant of what is said in the "Foreword" section of this document. Hence, this entire Annex A should be deleted as not being informative about "foundational principles."	Delete Annex A	Reject: Annex A is required by ASB.
39	Andrew Sulner	Annex C	T	This Bibliography and the hyperlinked list of SWGDOC documents have no place in a Scope of Work document and should be eliminated. The self-serving reference to other SWGDOC documents instead of the corresponding and primary ASTM consensus standards from which they derive has been addressed in my prior comments. I refrain from addressing the apparent motivations underlying the selective inclusion of certain references and selective omission of others of equal or superior relevance in this Annex C "Bibliography" in the hope that this Annex C will be deleted in its entirety for the reasons provided herein	Delete Annex C	Reject: There is no requirement that references be consensus standards. Normative and other references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference. No "equal or superior" references are suggested, therefore the comment is not actionable.
40	Judith Gustafson	Foreword/Abstract	T	The following sentence would be more technically accurate if you reworded as I recommend here.	I recommend installing the wording: "and reliable basis for" and changing the word "reach" to "render" in the following sentence: "Substantial skills and abilities are required to apply appropriate scientific and technical methodologies, followed by a knowledgeable and reliable basis for evaluation of the findings in order to render appropriate conclusions."	Accept
41	Judith Gustafson	3.1	T	The following sentence would be more technically accurate if you reworded as I recommend here.	I recommend installing the wording: "reliably" and "generally accepted" as follows: "An individual who (1) reliably applies scientific and/or generally accepted or technical practices to the recognition...."	Reject: This is a direct quote and therefore is not changeable. The reference is footnoted.
42	Judith Gustafson	4.3.1	T	The following sentence would be more technically accurate if you reworded as I recommend here.	I recommend deleting the first two words in the sentence and adding the wording "performed by someone who has the skills & abilities" as follows: "Forensic document examination is performed by someone who has the skills & abilities, knowledge of, access to..."	Reject: The CB feels that the current wording most clearly reflects the intent.
43	Judith Gustafson	4.5	T	The following sentence would be less confusing if you reworded as I recommend here.	"The forensic document examiner shall perform the following or record the reason(s) for not performing the action..."	Reject: The CB feels that the current wording is appropriate. Specific line deleted in rewriting 4.5
44	Meg O'Brien	4.2.1	T	There is no mention of indented impressions examinations under this section, but it is under section 4.2.2	update sixth line under 4.2.1 to read: detection and decipherment of alterations, obliterations, and indented impressions, and;	Accept
45	Meg O'Brien	4.3.2	T	Are typewriter grids considered Standard Equipment under section 4.3.2 or Special Equipment under section 4.3.3?	If needed, update fourth line under 4.3.2 to read: Appropriate ruler(s), grid(s), and other measurement device(s); and micrometer(s) or paper thickness gauges in SI (metric) or IP (inch-pound) units, or both.	Partial Accept: Added language, deleted language: "Appropriate ruler(s), grid(s), and other measurement device(s) in SI (metric) or IP (inch-pound) units, or both."
46	David Moore	4.2.2	T	At end of first bullet point, insert the words "writing and" before the final word "signature" that ends the sentence.	The first bullet point would end in the words ", including electronically-captured writing and signatures."	Accept
47	Thomas Vastrick	4.2.1	T	add to list to reference indented writing examinations	insert: detection and decipherment of latent indentations	Accept
48	Thomas Vastrick	4.2.2	T	add to list to reference indented writing examinations	insert: the decipherment of latent indentations	Reject: specifically covered in second bullet point

49	Thomas Vastrick	4.1	E	First sentence limits examination to entire document when only a portion of a document may be the issue at hand.	add ", or particulars therein," between the words "documents" and "is"	Reject: Limiting the examination to the submitter's perception of "the issue at hand" can lead to overlooking potential findings that might become a more important issue, and can also create an appearance of bias or violation of § 8 of the normative NCFS National Code: 8. Conduct independent, impartial, and objective examinations that are fair, unbiased, and fit-for-purpose. or in § 8 of the normative USDoJ Code of Professional Responsibility 8. Conduct examinations that are fair, unbiased, and fit-for-purpose.
50	Thomas Vastrick	4.3.2	T	There should be no waffling on whether an EDD is considered standard equipment. I consider it necessary.	remove words "or other device" from last sentence in 4.3.2	Accept
51	Thomas Vastrick	4.4.1	E	There are those who consider graphology separate but supplemental to FDE	add "nor is it an effective supplement to a forensic document examination." to the end of the last sentence of 4.4.1	Partial Accept: Wording added to strengthen the section. The study or practice of personality profiling or character assessment based on handwriting is not a foundation or a supplement, in whole or in part, for competence in the practice of forensic document examination.
52	Thomas Vastrick	4.4.3	T	no mention of training documentation	add "and shall be thoroughly documented." to end of first sentence of 4.4.3	Accept: Covered in Conformance 5.1.2
53	Thomas Vastrick	4.5	E	does not seem that "training" is the right word for fifth bullet point	replace "training" with "continuing education"	Partial accept: Replace with "continuing professional development proficiency testing" Specific line deleted in rewriting 4.5
54	Michele Triplett	3.1	E	The phrase being defined is only used in one place which means it can be defined where it is referred to (not in a separate section).	No need for this to be defined in a separate place.	Reject: This "specialized terminology" defined per ASB Style Guide Manual § 3.9.
55	Michele Triplett	3.1	T	Definition is false. A person applying technical practices is not a forensic SCIENCE practitioner, they are a technician.	Redefine for accuracy, and so that the definition applies to all disciplines. Each discipline cannot have a separate definition for such a standardized term.	Reject: Definition from NCFS, as footnoted, and apparently was intended to be all encompassing.
56	Michele Triplett			This does not seem to be a standard, it is just general information.	No need for a document like this from a standards board. It should be a wikipedia page.	Reject: From its inception, almost 50 year ago, this document provides useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Please refer to information on the OMB Circular A-119 for additional information on the use of voluntary consensus body standards.
57	Michele Triplett	4.4.3	T	A standard should state the standard, not refer to other documents		Reject: No Proposed Resolution provided.
58	Michele Triplett	4.5	T	Each section of the ASB should not have their own section on these items because it will lead to inconsistency. It should be standard among all forensic disciplines and placed elsewhere.		Reject: Non-actionable. Listing the NCFS and USDoJ Codes as a normative references is consistent with the comment. Specific line deleted in rewriting 4.5

59	Michele Triplett	5.1	T	This document does not seem to be a standard to follow, it seems to be too general to be useful and too general to be accountable to.	Scrap document. It seems to be an effort to put something out so that it looks like the discipline has standards.	Reject: From its inception, almost 50 years ago, this document provides useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Please refer to information on the OMB Circular A-119 for additional information on the use of voluntary consensus body standards.
60	Michele Triplett	5.1.2	T	Show you are competent is not a standard.		Non-actionable—no suggested resolution: Competence defined in 4.4.1 (reworded) and conformance requirements are in 5.1.2
61	Michele Triplett	All ASB documents		The above shows a need for an overall ASB review board to ensure documents and philosophies are professional and consist.		Reject: From its inception, almost 50 year ago, this document provides useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Please refer to information on the OMB Circular A-119 for additional information on the use of voluntary consensus body standards.
62-1	Vicki Willard	2	T	1/2 The reference to SWGDOC standards is inappropriate because the group is not registered with ANSI as a approved organization to develop consensus standards. Standards published by SWGDOC are standards endorsed by a private group of individuals. By inclusion, it is tantamount to an endorsement by the ASB of the SWGDOC standards, the implication for the reader (since there is not a disclaimer), is that they are approved consensus standards. At the June 8, 2017 CB web meeting, the members stated the SWGDOC was not a consensus body and that the SWGDOC standards should be updated and made consensus standards. Inasmuch as SWGDOC is in the process of updating the training standard, terminology and other standards, listing them now is inappropriate. It is my understanding from what I have read and heard at this meeting that once the updates are completed, the SWGDOC plans to submit the standards to ASB to become consensus standards. Perhaps balloting the Scope standard should be withdrawn – put on hold – until other SWGDOC standards become consensus standards. Then it would be appropriate to include them for reference. If upon publication of the Scope standard, an referenced SWGDOC standard were to be downloaded, it would, according to CB/SWGDOC, be old and not relevantly updated. The ABS endorsement by inclusion of these standards from a private group of individuals who can change the content of a standard at whim, is a disservice to the greater forensic document examination community, the legal community and others referenced in Annex A.	Recommendation: List the following in Normative References with footnote: ASTM E2195 Standard Terminology Relating to the Examination of Questioned Documents ASTM E2388 Standard Guide for Minimum Training Requirements for Forensic Document Examiners Footnote: These consensus documents were passed by the ASTM Subcommittee on Questioned Documents and became consensus standards for use by forensic document examiners. The ASTM retired the forensic document standards upon their expiration date after the closing of ASTM Subcommittee on Questioned Documents in 2012, but maintains the copyright and continues to offer the standards for sale on the ASTM website.	Reject: References from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference. Editorial modification: The date of the current Terminology document (and other SWGDOC references) has been added to the normative reference, therefore, future versions of the document, if changed by SWGDOC, would not be a viable reference. When other approaches are available, they can be considered in future revisions of this document.

62-2	Vicki Willard	2	T	<p>2/2 At the June 8, 2017 CB web meeting it was also stated that the training guide was put into the OSAC Registry for comments. Apparently the there were issues and it was sent back to the SWGDOC, who "tweaked it" (meeting words), then resubmitted it to OSAC. According to the OSAC June 2017 Newsletter, the training standard remains in the OSAC adjudication process. This is another reason it would be inappropriate to list the training standard in the Scope standard.</p> <p>The ASTM Subcommittee on Questioned Documents published consensus Guides. A Guide is defined as " a compendium of information or series of options that does not recommend a specific course of action" (Forms and Styles for ASTM Standards). During the consensus process the questioned document committee of the ASTM clearly stated that they did not want to have a "mandate" in the training guide – hence the use of the term "guide" rather than calling it a "practice". The SWGDOC is essentially trying to bypass what could not be accomplished through the ASTM consensus process and make its training standard mandatory by inclusion under Normative References. Normative References which, according to ISO, means something that is indispensable. The SWGDOC training Standard has not yet reached that level and won't until it goes through the appropriate consensus process to become a standard.</p>	<p>Alternative recommendation: Remove the Scope of Expertise in Forensic Document Examination from the ballot until other appropriate SWGDOC standards have completed the consensus process and become ASB standards, at which time listing them would be appropriate, and the Scope standard can be revisited.</p>	<p>Reject: The ASB is independent of OSAC and its subcommittees and advisory committees, and proceeds according to its own Procedures governing Standards Developing Organizations.</p> <p>The development of this document follows ASB and ANSI rules and is not subject to ISO requirements.</p> <p>The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the application of this document.</p>
63	Vicki Willard	3	T	<p>Improper reference to SWGDOC standards because the group is not registered with ANSI as a approved organization to develop consensus standards. Any standards published by SWGDOC are only standards endorsed by this private group of people. More importantly, the Terms and Definitions section, according to ISO, is for "clarifying the meaning of certain words in the context of the document. Only terms which are used in the document shall be defined." The SWGDOC terminology listed in the referenced standard defines twenty-five terms used to describe handwriting features when doing an analysis (e.g., drag stroke, connecting stroke, descender, loop, line quality) and has nothing to do with a discussion on the Scope of Work of a forensic document examiner. According to ISO, the heading Terms and Definitions must be in a standard, but it does not require any entries under the heading if nothing is appropriate or necessary. There are no terms used in the Scope of Expertise in Forensic Document Examination standard that would require the reader to turn to the Terminology standard for definitions.</p>	<p>Remove reference to the terminology standard. It is not relevant.</p>	<p>Reject: There is no requirement that references be consensus standards.</p> <p>Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC document is the most appropriate document to reference.</p> <p>This document uses the terms defined in the SWGDOC terminology document, as is stated in Section 3. Therefore, it is rightfully a normative reference. Examples of such terms used in this standard that are taken directly from the SWGDOC terminology document are: Indentations (Section 4.2.2 and 4.3.2);</p> <p>The development of this document follows ASB and ANSI rules and is not subject to ISO requirements.</p>

64	Vicki Willard	4.1	T	There are three references to either graphology or personality profiling (graphology) throughout the proposed standard. One in this section, second paragraph. Inasmuch as "personality profiling" is unrelated to forensic document examination, it is not part of it's background. Further this standard is about what forensic document examination IS, not about what it IS NOT. One reference to personality profiling as not relevant is sufficient and that reference can be found in section 4.3.3 Initial Training and Professional Development.	Eliminate the last paragraph that begins "Forensic document examination does not involve...."	Reject: From its inception, almost 50 years ago, this document has provided useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Specification of the areas outside the responsibility of an FDE is appropriate general background information, as well as appropriate information as to general competence and initial training. As an example of the general FDE agreement to state what is not applicable to FDE, it is the official position of an FDE organization (AFDE) that "the practices and principles of graphoanalysis/graphology (i.e., personality assessment through the use of handwriting) are not recognized as training for, nor are they applicable in, the field of Forensic Document Examination" (http://afde.org/resources/AFDE_CODE-OF-ETHICS.pdf) Picking up on this language, the text of 4.1 editorially modified From Forensic document examination does not involve the employment or practice of the study of handwriting in an attempt to create a personality profile or otherwise analyze or judge a writer's personality or character. To Forensic document examination does not involve the practices or principles of the study of handwriting for personality assessment, or in an attempt to create a personality profile, or
65	Vicki Willard	4.2 Bullet point 6	T	Bullet point 6 is somewhat misleading. Forensic document examiners by an overwhelming majority, both in the public and private sector conduct only non-destructive examinations of ink, paper, and writing instruments. Destructive testing for ink identification and comparison is referred to the larger public agency laboratories or specialists in both the public and private sectors. Identification of ink requires a database (with regular updating) not available to smaller/local laboratories and individual examiners. This distinction should be made or a note added stating same.	Add the following Note at the end of the section Note: The majority of forensic document examiners use non-destructive examination procedures for comparison of ink and paper. If destructive analysis is required, the task is generally referred to a major public laboratory employing an ink expert or paper chemist, or an ink expert or paper chemist in the private sector. Preservation of charred documents or liquid soaked documents may also be referred to a paper conservation laboratory.	Refers to 4.2.2 Reject: Any problem can require additional input or services. Even if material is sent elsewhere, the FDE still has the responsibility of conducting "the examination and comparison of ink, paper, and writing instruments" that lead to a referral elsewhere. Limitations on examinations that can be performed without specialized equipment or advanced training are set out in the appropriate task specific standards.
66	Vicki Willard	4.2 Bullet point 7	T	Bullet point 7 is somewhat misleading. The majority of public agencies and most private offices refer charred documents or liquid-soaked documents to the larger public agency laboratories or a specialist. Although the examiner may have studied these topics during training, most public agency document examiners rarely, and perhaps never, devote time to case work in these areas. In the private sector, an examiner usually will never encounter such a case in his/her career. Clarification is needed so as not to imply these are routine matters in an examiner's case work	See resolution above	Refers to 4.2.2 Reject: Any problem can require additional input or services. Even if material is sent elsewhere, the FDE still has the responsibility of conducting "the collection and preservation of charred or liquid-soaked documents" that lead to a referral elsewhere. Limitations on examinations that can be performed without specialized equipment or advanced training are set out in the appropriate task specific standards.

67	Vicki Willard	4.4.1	T	<p>In the second paragraph the standard discusses personality profiling and character assessment based on handwriting. As stated previously in my comments, this standard is about what forensic documentation IS, not what it IS NOT. This second reference to personality assessment is inappropriate. One reference to personality profiling as not relevant is sufficient and that reference can be found in section 4.3.3 Initial Training and Professional Development.</p>	Delete the second paragraph under 4.4.1 in its entirety	<p>Reject: From its inception, almost 50 years ago, this document has provided useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Specification of the areas outside the responsibility of an FDE is appropriate general background information, as well as appropriate information as to general competence and initial training. As an example of the general FDE agreement to state what is not applicable to FDE, it is the official position of an FDE organization (AFDE) that "the practices and principles of graphoanalysis/graphology (i.e., personality assessment through the use of handwriting) are not recognized as training for, nor are they applicable in, the field of Forensic Document Examination" (http://afde.org/resources/AFDE_CODE-OF-ETHICS.pdf)</p>
						<p>(continued from previous section) Picking up on this language, the text of 4.1 editorially modified From Forensic document examination does not involve the employment or practice of the study of handwriting in an attempt to create a personality profile or otherwise analyze or judge a writer's personality or character. To Forensic document examination does not involve the practices or principles of the study of handwriting for personality assessment, or in an attempt to create a personality profile, or otherwise analyze or judge a writer's personality or character. The number of references to this issue reflects the diverse contexts where this issue arises.</p>
68	Vicki Willard	4.4.2	T	<p>KSAs include a wide range of topics. Why is this section emphasizing the manufacturing processes for production and preservation of documents? Sections 4.2.1 and 4.2.2 list many areas requiring KSAs.</p>	<p>Rewrite this section to read as: Forensic document examiners offer services in many areas, such as those listed in Sections 4.2.1 and 4.2.2. In order to properly assess, analyze, compare and evaluate the submitted evidence, the examiner must have proficiency in the related areas.</p>	<p>Forensic document examination does not involve the employment or practice of the study of handwriting in an attempt to create a personality profile or otherwise analyze or judge a writer's personality or character.</p>

69	Vicki Willard	4.4.3 (paragraph 1)	T	<p>If the ASB intends to establish a consensus standard for training that is within its prerogative, but it is improper to reference the SWGDOC standard because the group is not registered with ANSI as a approved organization to develop consensus standards. By referencing the SWGDOC standard for training the ASB is endorsing this standard which has not been subjected to the consensus processes required by ANSI. A proper reference would be ASTM E2388, even though it is a retired standard – retired only because there is no longer an ASTM Subcommittee on Questioned Documents to renew the standard on its 5-year anniversary. It still is the only authentic consensus standard and is copyrighted by ASTM and still available for purchase.</p> <p>I repeat my comments stated under (2) Normative References. At the June 8, 2017 CB web meeting, the members stated the SWGDOC was not a consensus body and that the SWGDOC standards should be updated and made consensus standards. Inasmuch as SWGDOC is in the process of updating the training standard, terminology, and other standards, listing them now is inappropriate. It is my understanding from what I have read and heard at this meeting that once the updates are completed, the SWGDOC plans to submit the standards to ASB to become consensus standards. Perhaps balloting the Scope standard should be postponed until other SWGDOC standards become consensus standards, then it would be appropriate to include reference to them as references. If an included SWGDOC standard were to be downloaded upon publication of the Scope standard, it would, according to SWGDOC, be old and not relevantly updated. The ASB endorsement by inclusion of these standards from a private group of individuals who admit the standards need updating and can, at whim, change the content of a standard is a disservice to the greater forensic document examination community and others referenced in Annex A.</p>	<p>Recommendation: Substitute reference to ASTM E2388 and add a footnote as suggested in my Normative References comment.</p> <p>Alternative recommendation: Remove the Scope of Expertise in Forensic Document Examination from the ballot until other appropriate SWGDOC standards have completed the consensus process and become ASB standards, at which time listing them would be appropriate</p>	To
70	Vicki Willard	4.3.3. (paragraph 2)	T	<p>Rewrite this section, by leaving out the words “qualify an individual” and replace with “properly train and prepare an individual”.</p>	<p>rewrite as follows: Short overview courses, literature reviews or distance learning, in and of themselves, do not properly train and prepare an individual as a forensic document examiner</p>	<p>Forensic document examination does not involve the practices or principles of the study of handwriting for personality assessment, or in an attempt to create a personality profile, or otherwise analyze or judge a writer’s personality or character.</p>
71	Vicki Willard	4.3.3 (paragraph 3)	T	<p>Retired government investigators and local law enforcement officers can take short courses offered by the Secret Service and FBI. According to the FBI, these are courses designed for investigators to learn about document examination to assist in their work and preparation to hand cases over to forensic document examiners employed in the laboratory. However, after retirement some investigators and law enforcement personnel hang out a shingle offering document examination services along with private investigating. This is not uncommon, therefore, the paragraph should be more specific in acknowledging the several week courses offered by the FBI and Secret Service as not being adequate training. (In this section, it is appropriate to include personality profiling.)In my recommendation I had added the words “training” prior to the words “law enforcement” and “short several week courses offered by the FBI or Secret Service”.</p>	<p>Rewrite to read as follows. “Other kinds of experience and training do not constitute expertise or training in whole or in part in forensic document examination (e.g., calligraphy, penmanship, personality profiling or character assessment, training in law enforcement, loss prevention, banking, general criminalities, short several week courses offered by the FBI or Secret Service, or other forensic disciplines, legal training, or laboratory management.”</p>	<p>The number of references to this issue reflects the diverse contexts where this issue arises.</p>
72	Vicki Willard	5.1.	T	<p>All training and other records should be maintained by not only the laboratory who employs the document examiner, but the employee (himself or herself) as well. Otherwise, when asked to produce records in a deposition, trial, or other venue , an agency examiner can say (and some have said) that she or he cannot produce training and other records because “the laboratory controls those records”. If examiners in private practice have to maintain and produce records, then so should all agency examiners do the same. Records can be required in both criminal and civil matters and examiners should not be able to avoid producing records by claiming the “laboratory controls records and I do not have copies”. Many agency examiners work in the private sector in their “off-hours” and should be held to the same standard and full-time private examiners.</p>	<p>Add the following words. “Documents to verify conformance with the above requirements shall be maintained by the laboratory, the laboratory employee, and the private examiner and shall be made available to auditors and others upon proper inquiry.”</p>	<p>Partial Accept: Change “or” to “and” each laboratory and individual</p>

73	Vicki Willard	5.1.2	T	<p>Continuing education is missing in this section. All examiners must participate in continuing education to maintain skills, knowledge and abilities. It is a requirement of certification boards. Continuing education credits must be documented along with everything else listed. Also, a lab employee must also maintain copies of his or her personal records for production as required.</p> <p>This section states that a laboratory must be accredited and an examiner certified by "a recognized accreditation or certification body". The word "recognized" has no value, no meaning, unless the existing accreditation boards are listed for the reader to access whether the accreditation of the lab or certification of an individual is "recognized".</p>	<p>Recommendation (1): Rewrite the paragraph to read: Conformance to 4.4 Competence requires the laboratory and the individual forensic document examiner to maintain and supply evidence of technical competence (e.g. maintaining appropriate training records, participating in inter-laboratory comparison, individual proficiency testing, continuing education credits, and by demonstrating laboratory accreditation or individual certification by a required accreditation or certification body.</p> <p>Recommendation (2): Add a NOTE at the end of the section or put a footnote after the words laboratory accreditation and individual certification . Either a Note or Footnote would read as follows: As of the date of this publication this standard recognizes laboratory accreditation by (list the several accrediting bodies) and accreditation of forensic specialty certifying boards by the Forensic Specialties Accreditation Board (FSAB).</p>	<p>1) Accept: Added 2) Reject: In the opinion of the CB the current language is preferable.</p>
74	Vicki Willard	ANNEX A	T	<p>The text under this heading has nothing to do with the "foundational principles" of the profession. If you want to discuss (once again) the examiner needs KSAs, then add that the examiner must be ethical and unbiased.</p>	<p>Reword to include ethical and unbiased.</p>	<p>Reject: The CB feels that the current wording is appropriate. Suggested additions are neither foundational nor principles. They are covered in the bibliography</p>
75	Vicki Willard	ANNEX C	T	<p>I understand that the ISO recommendation is to keep the bibliography short and for this reason a short list should be relevant and up-to-date. Under Foundation Principles it states the Annex is to provide guidance for those encountering issues related to forensic documents and lists several occupations, including attorneys and the judiciary. If a lawyer or judge wanted to learn about document examination, why would he search for a book published in 1899 when fountain pens were the writing instrument of choice? The list should include the most current book relevant to today's forensic issues (e.g., digital tablet writing) and revised editions of older books. I note that the Hilton book and its up-date are listed. The Huber and Headrick book is listed, but its up-date is missing. The Huber And Headrick revised edition is currently being sold on the open marketed as pre-publication sale with the official release in October 2017. Since it is now available for purchase, it is appropriate to list as a reference. Also, many relevant articles are found in journals. Journals articles can be found on-line and in other databases.</p>	<p>Recommendation 1: Eliminate (1) Ames, Daniel T. (1899 book) Recommendation 2: Add the following newer books which includes another classic book in the profession and the professional journals.</p> <p>Harralson, Heidi H. and Larry S. Miller, Handwriting Identification: Facts and Fundamentals., CRC Press. 2nd Ed. 2017</p> <p>Harralson, Heidi H., Developments in Handwriting and Signature Identification in the Digital Age, Anderson Publishing (Elsevier), 2013.</p> <p>Caligiuri, Michael, Ph.D. and Linton A. Mohammed, MFS, The Neuroscience of Handwriting: Applications for the Forensic Document Examiner, CRC Press, 2012.</p> <p>Baker, J. Newton, Law of Disputed and Forged Documents, The Michie Company, 1955.</p> <p>Journal of the American Society of Questioned Document Examiners, published by American Society of Questioned Document Examiners.</p> <p>Journal of Forensic Document Examination, published by the Association of Forensic Document Examiners.</p>	<p>Reject: The development of this document follows ASB and ANSI rules and is not subject to ISO requirements. "The last annex contains the Bibliography. The Bibliography shall be informative (i.e., the documents listed are not included in Section 2 of the Standard)."-ASB Style Guide Manual §3.12</p> <p>Reject: Old documents written with fountain pens are regularly submitted for examination (e.g., wills), and fountain pens are still used by those who sign documents involving very large sums of money. Knowledge of the characteristics of fountain pen writing are still required for forensic document examiners.</p> <p>Reject: The Ames book should remain as it has considerable useful information.</p> <p>Reject: References to specific journal articles can be appropriate; however, because journals can contain a wide variety of articles, including those that can be inappropriate</p>

76	Vicki Willard	ANNEX C	T	<p>After listing the books, there is a list of SWGDOC standards with download links. The reference to SWGDOC standards is inappropriate because the SWGDOC is not registered with ANSI as a approved organization to develop consensus standards, thus SWGDOC standards are not consensus standards. Standards published by SWGDOC are standards endorsed by a private group of people. By inclusion, it is tantamount to an endorsement of the SWGDOC standards by the ASB. If the ASB chooses to ballot these standards, that is their prerogative. If balloted individually, they would become approved consensus standards, if ANSI due process was followed, and would then be appropriate to list..</p> <p>As stated previously, so I will not repeat in its entirety, please remember that the CB stated at its meeting that the SWGDOC standards are not consensus standards and that they should and would be updated. Until the updated standards have gone through the ASB consensus process to become standards, it is a disservice and misrepresentation to the legal profession and others to promote said standards by inclusion in Scope because the reader will assume them to be consensus standards, unless there is no disclosure otherwise. All of the topics of the SWGDOC standards are still available as consensus standards, even though withdrawn. The ASTM states that withdrawn standards can still be used and are available for purchase from the ASTM (see website sales).</p>	Eliminate the SWGDOC documents listed for download.	<p>Reject: There is no requirement that references be consensus standards.</p> <p>Normative and other references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference.</p> <p>Editorial modification: The date of the current SWGDOC references has been added to the normative reference, therefore, future versions of the document, if changed by SWGDOC, would not be a viable reference.</p>
77	Susan Abbey	2		The word "Normative" implies that the references are without controversy and widely accepted. SWGDOC Standard for Minimum Training Requirements for Forensic Document Examiners has been anything but without controversy.	Leave the word "Normative" out.	<p>Reject: This is a normative reference since it is essential to the application of this document.</p> <p>The training document is specifically cited in Section 4.4.3</p>
78	Susan Abbey	4.4.3		<p>Line 1 "The examiner's training "shall" conform to SWGDOC....."</p> <p>The word "shall" implies a requirement. As stated above, this Standard is very controversial.</p>	Replace "shall" with "should".	<p>Reject: The training document is specifically cited in Section 4.4.3 This is a normative reference since it is essential to the understanding of this document. Normative references from any source may be used as long as the reference is publicly available. The consensus body feels that, at this time, the SWGDOC documents are the most appropriate documents to reference. When other approaches are available, they can be considered in future revisions of this document.</p>
79	Michael Wakshull	4.1	E	Delete the last paragraph (top of page 2). The comment is superfluous as FDE also does not include the study of penmanship, linguistics, or other aspects of writing. An out of scope statement is useful if it is complete. This is included below in 4.4.3.	Delete the paragraph	<p>Reject: This is not superfluous. From its inception, almost 50 years ago, this document has provided useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Specification of the areas outside the responsibility of an FDE is appropriate general background information, as well as appropriate information as to general competence and initial training. As an example of the general FDE agreement to state what is not applicable to FDE, it is the official position of an FDE organization (AFDE) that "the practices and principles of graphoanalysis/graphology (i.e., personality assessment through the use of handwriting) are not recognized as training for, nor are they applicable in, the field of Forensic Document Examination" (http://afde.org/resources/AFDE_CODE-OF-ETHICS.pdf)</p>

						(continued from previous section) Picking up on this language, the text of 4.1 editorially modified From Forensic document examination does not involve the employment or practice of the study of handwriting in an attempt to create a personality profile or otherwise analyze or judge a writer's personality or character. To Forensic document examination does not involve the practices or principles of the study of handwriting for personality assessment, or in an attempt to create a personality profile, or otherwise analyze or judge a writer's personality or character.
80	Michael Wakshull	4.2.1	T	Add a bullet - Source of electronically produced documents. Document examiners need to examine metadata for documents to learn the source, date produced, date modified, etc. This can lead the document examiner to determine authenticity of the document.	Insert the bullet "- source(s) of electronically produced document(s)	Reject: This is a nonexclusive list, appropriate examinations of electronic documents is not excluded. It could be considered as included under the bullet point "associations of materials and devices used to produce documents" Other topics can be considered for specific mention in future revisions of this document.
81	Michael Wakshull	4.2.2	T	The third bullet down on page 3 addresses documents made of hard material. It does not address electronic documents.	After "ink" in line 1 of the third bullet down on page 3, add ", pixelation" to address electronically produced documents	Reject: this is not an exhaustive list, only representative
82	Michael Wakshull	4.3.2	T	Standard equipment must include computer software	Add a bullet such as, "Computer software such as high resolution scanning software, image analysis software, software to create demonstrative exhibits, word processing software, and other software to examine electronically produced documents."	Partial Accept: Modify 4.3.1 The forensic document examiner shall ensure that all equipment and apparatus is properly maintained and calibrated, and is used with appropriate software.
83	Michael Wakshull	4.4.3	E	Paragraph 2 includes distance learning as not qualified for learning FDE. This is an antiquated concept since most major universities offer advanced degree classes and matriculation to a degree via distance learning. There are universities that offer graduate level studies in forensic document examination. Attendance at these courses requires application and admission to the university.	Either remove "distance learning" or elaborate with language such as "other than from an accredited school of higher learning."	Reject: Currently no accredited institution of higher education offers a distance learning program that in and of itself qualifies an individual as a forensic document examiner. When other approaches are available, they can be considered in future revisions of this document.
84	Michael Wakshull	4.4.2	E	ASTM E444 and SWGDOC Standard for Scope of Work of Forensic Document Examiners includes, "4.4 ... or education specific to forensic document examination as well as from a number of other fields, such as the physical sciences, mathematics, language studies, and the like."	Add this verbiage into the proposed ASB standard.	Partial Accept: The phrase "in areas specific to forensic document examination" added to 5.1.2. Training in tangential fields is beyond the scope of this document.
85	Michael Wakshull	5.1.2	E	Is the suggestion that individual sole practitioner FDEs need to attain laboratory certification through ASCLAD or other body? This is an onerous expense. More elaboration about the intent and scope of this requirement is needed before this can be included in a standard. What is meant by "inter-laboratory comparison?" What is being compared?	Remove this vague verbiage.	Reject: In the opinion of the CB the current language is appropriate. Some private practice forensic examiners have laboratory accreditation; however, the text of 5.1.2 specifically provides a choice: "laboratory accreditation or individual certification" for the FDE to demonstrate individual certification. Inter-laboratory comparison is a well accepted term of art, also known as "round robin testing"

86	Dianne Peterson	4.4.3	T	It antiquated for the only recognizable training is to be on-site. All major universities offer distance learning options.	Recognize distance-learning programs, but also offer necessary on-site laboratory opportunities for FDEs.	Reject: Currently no accredited institution of higher education offers a distance learning program that in and of itself qualifies an individual as a forensic document examiner. When other approaches are available, they can be considered in future revisions of this document.
87	Dianne Peterson	4.4.2	T	It is antiquated for computer software and electronic magnification devices to not be included in the standard equipment section.	Recognize computer software and electronic magnifications devices as standard equipment for all FDEs.	[refers to 4.3.2] 1) Partial Accept: Modify 4.3.1 The forensic document examiner shall ensure that all equipment and apparatus is properly maintained and calibrated, and is used with appropriate software. 2) Reject: Magnification is mentioned in the second bullet point and includes analog and digital.
88	Dianne Peterson	4.4.2	E	Full-time needs to be defined in the number of hours per week dedicated to FDE training. The case load needs to be defined as to what type of cases are required for training.	Define the type and number of required for FDE competencies.	Reject: The term "full time" is not used in this document. Defining this term is beyond the scope of this document. Reject: The term "case load" is not used in this document. Defining or quantifying this term is beyond the scope of this document.
89	Dianne Peterson	4.5	E	appropriate- as defined by whom???	Delete the word appropriate	Reject: As defined in #9 of the NCFCS and USDOJ Codes. Specific line deleted in rewriting 4.5
90	Dianne Peterson	5.2	T	inter-laboratory comparions- should be replaced with Peer Review	delete the work inter-laboratory comparions with and replace with Peer Review	Reject: Inter-laboratory comparison (round robin testing) is very different from Peer Review; the two should not be confused.
91	Brent Ostrum			Despite being a very basic informational document, the purpose of this standard is not particularly clear. The title is "Scope of Expertise in Forensic Document Examination" and the scope of the document itself is stated as "This standard describes the responsibilities of and general qualifications for forensic science practitioners engaged in the practice of forensic document examination" (which I think can be improved - see suggestion). Several parts of the document extend beyond this basic purpose into some type of conformity assessment document (which makes no sense for an informational guide/standard). Depending upon the purpose for this document a complete rewrite or restructuring may be needed. I have also assumed this document is intended to be specific to FDE and not general to Forensic science/other disciplines.	Clarify the purpose and rewrite to fulfill that purpose. "This standard describes the range of activities encompassed by the discipline of Forensic Document Examination. This document provides guidance to anyone encountering matters involving forensic document examination." The issue of "responsibilities" and "general qualifications" can remain	Reject: From its inception, almost 50 year ago, this document provides useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment. Please refer to information on the OMB Circular A-119 for additional information on the use of voluntary consensus body standards.
92	Brent Ostrum	Abstract	E	Remove unnecessary 'fluff' and non-QDE info. ASB guideline say abstract should be 2-3 sentences.	Delete 'and ever expanding' from first sentence. Delete entire second sentence.	Reject: The abstract is for information purposes only, the guideline to keep it to 2-3 sentences is a general guideline and the working group feels that the information provided in this abstract is appropriate.
93	Brent Ostrum	1	E	A document describing the scope of FDE should clearly explain the limits of the discipline. To that end, it must address the key question "in what general areas or specific techniques is a FDE trained and competent?" in order to provide guidance as to what is and is not done by a FDE. At the same time I do not believe it should delve deeply into methods used, equipment used, etc. - that is better done via separate methods documents.		Reject: a) Limitation are stated in 4.4.1 and 4.4.3. No limitations were proposed by the commenter. b) FDEs have a wide variety of technical equipment at their disposal, and a full examination requires using the equipment properly. No resolution was proposed by the commenter.

94	Brent Ostrum	2	T	The NCFS document, in particular, is NOT required as a normative reference. It could be a useful reference in the body of the standard but not as presently used. See comment 19 below.	Delete NCFS reference	Reject: This is a normative reference since it is essential to the application of this document as set forth in Annex B.
95	Brent Ostrum	3.1	T	This definition is not needed. The term is used only in Section 4.5 which provides generic information NOT specific to FDE. See comment 19 below.	Delete 3.1 (simply use footnote when the term appears in the text).	Reject: This "specialized terminology" defined per ASB Style Guide Manual § 3.9.
96	Brent Ostrum	4	E	I think the ASB guide requires these sections to indicate whether content is mandatory, optional or conditional in the section heading.	Add classification to each section as appropriate. Eg., the only sections I see as being possibly 'Mandatory' are 4.3.2 and 4.4 (as presently written).	Partial Accept: Indication of the nature of section is from applicable verb (e.g., shall, should, may, can), where needed. "Shall" language inserted in 4.2.1.
97	Brent Ostrum	4.1	E	Last sentence of 1st paragraph should be edited or changed (example provided). While demonstrative aids MAY be considered evidence it depends on the court/jurisdiction. As such it is better to describe such things in more general terms.	"Examiners often use demonstrative charts or images which serve to illustrate and clarify the basis of the opinion (i.e., by presenting the findings that support the examiner's belief)."	Partial Accept: Added operative verbiage at the end of the sentence.
98	Brent Ostrum	4.2.1	E	The phrase "and other tasks" begs the question of 'what other tasks'? Are these the tasks shown in 4.2.2 or something else entirely? The relationship between sections 4.2.1 and 4.2.2 is not clear. I assume that 4.2.1 is outlining the types of issues/questions a FDE tries to address when they conduct an examination. 4.2.2, on the other hand, provides a list of the tasks performed in the course of those examinations. At least that is how it seems to me.	Either remove the phrase ("and other tasks") or clarify what those "tasks" are somewhere in the document (eg., in section 4.2.2?)	Accept: Removed "and other tasks"
99	Brent Ostrum	4.2.1	E	Further to my earlier comment the wording in the preface is confusing (to me) as it isn't clear what the list is about. In particular, I think it needs to be made clear that this is an incomplete list of the type of issues an FDE can address.	Change preface wording to "The FDE analyses, compares and evaluates documents, or aspects of a document, to provide information and opinions relating to, among other things:"	Reject: Use of "including" means that this is a nonexclusive list. In the opinion of the CB the current language is preferable.
100	Brent Ostrum	4.2.2	T	What does the term "machine ribbons" mean? From the context I think the intention is a typewriter ribbon (or something similar).	Clarify what the term means.	Partial Accept: Change to the two machine ribbon bullet points to "the decipherment of machine ribbons and other intermediary media and their comparison to print outs and other output" to include offset plates, mimeo masters, and ribbon printers of ID badges, etc.
101	Brent Ostrum	4.2.3	T	The first sentence is generic to all forensic disciplines and not FDE specific. The second sentence is not needed at all. The term 'extent of examinations' implies information about what goes beyond the range of FDE scope, ie., what is NOT done or what are the LIMITS of the discipline?	Delete existing text and replace with statements about those things NOT done by FDEs. For example, the comment about 'graphology' should go here. Other examples, "examiners do not examine printers to make repairs" or, "Examiners are not experts in related disciplines such as physics, chemistry, photography, imaging, printer maintenance, etc. (unless they have received specialized training in those non-FDE areas)."	1) Reject: If the statement is generic and applicable to all forensic disciplines, it is, therefore, applicable to FDE. 2) Reject: Printers are examined when available, for instance to locate defects on imaging or other rollers. 3) Reject: Areas considered beyond the extent of the forensic examination of documents are referenced in 4.1, 4.4.1, and 4.4.3. Adding another reference to not performing personality profiling at this point might be considered redundant.

102	Brent Ostrum	4.3.2	E	<p>Is the list actually 'standard' equipment? I don't think so.</p> <p>A list of equipment required for this work depends upon which specific METHOD(S) is being applied by the examiner. It is, in other words, method-specific. Therefore, it makes more sense to defer discussions of required/optional equipment to a document discussing a specific method. Discussion of equipment is not needed in a scope document.</p> <p>Further, some of the items on the list would never be used by a lot of examiners - it depends upon the type of questions they encounter in their daily work and the methods they apply. For example, coloured filters can be very useful/handy but there are examiners who never use them and, more importantly, never need them at all to do their work. Similarly micrometers are great but how often does one use it?</p>	Delete all extended discussion of equipment and replace with a statement along the lines of "Equipment required for these tasks is outlined in relevant methods documents available from SWGDOC."	<p>Partial Accept: Some modification of listed equipment. The methods used are all those required to perform the examinations tasks listed in 4.2.1 and 4.2.2 and the others that are implied throughout the document and the listed equipment is necessary.</p>
103	Brent Ostrum	4.3.3	E	<p>As per the point above, discussions of equipment should be in other method-specific documents.</p> <p>However, I will note that whenever a standard procedure exists that document will specify any "required equipment" as part of that standard.</p>	Delete this section or defer to other method-specific documents.	<p>Partial Accept: Added reference to the specific SWGDOC standards in Annex C</p>
104	Brent Ostrum	4.3.3	T	If this section is retained then note that the second sentence is a directive, and not optional.	"Examiners must understand each technique's capabilities and limitations before applying the relevant method."	<p>Accept: Change "Examiners should understand" to "Examiners shall understand" and move to 4.3.1</p>
105	Brent Ostrum	4.4.1	E	First sentence is obvious (and essentially redundant with 4.4.2). The second sentence is redundant and unnecessary.	Delete the second sentence.	<p>Reject: From its inception, almost 50 years ago, this document has provided useful background information on the duties and limitations of the FDE segment of the forensics industry, as well as being used to provide information for drafting job descriptions for employment.</p> <p>Specification of the areas outside the responsibility of an FDE is appropriate general background information, as well as appropriate information as to general competence and initial training.</p> <p>As an example of the general FDE agreement to state what is not applicable to FDE, it is the official position of an FDE organization (AFDE) that "the practices and principles of graphoanalysis/graphology (i.e., personality assessment through the use of handwriting) are not recognized as training for, nor are they applicable in, the field of Forensic Document Examination" (http://afde.org/resources/AFDE_CODE-OF-ETHICS.pdf)</p>

						(continued from previous section) Picking up on this language, the text of 4.1 editorially modified From Forensic document examination does not involve the employment or practice of the study of handwriting in an attempt to create a personality profile or otherwise analyze or judge a writer's personality or character. To Forensic document examination does not involve the practices or principles of the study of handwriting for personality assessment, or in an attempt to create a personality profile, or otherwise analyze or judge a writer's personality or character. The number of references to this issue reflects the diverse contexts where this issue arises.
106	Brent Ostrum	4.4.2	T	As requisite KSA, this is VERY short and limited.	I'm not sure how to expand on the KSA's for FDE work but it might be worthwhile contacting the ABFDE about the work done in that area for their testing program.	Partial Accept: modified to 4.4.2 broaden
107	Brent Ostrum	4.4.3	T	Nothing in this section specifically relates to 'professional development'	Provide definition for professional development, and provide examples of what PD is (or delete it from the title). Eg., professional development activities include attendance at FDE or FS conferences, conducting FDE-related research, writing FDE-related articles/papers/etc., presenting at conferences, attending or presenting workshops on FDE topics, etc.	Accept New section on Professional Development added
108	Brent Ostrum	4.4.3	E	2nd sentence should be clearer and more direct.	"Short overview courses, literature reviews or distance learning options are inadequate for training purposes unless conducted as part of a complete training program." Or "Short courses... are acceptable only as an adjunct to, or as part of, an overall complete training program."	Partial Accept: modified as follows: "Short overview courses, literature reviews, or distance learning, in and of themselves, do not properly train or prepare an individual for competence in the practice of forensic document examination."
109	Brent Ostrum	4.4.3	E	Overall, I feel this section should address something very different. The real issues of concern for FDE work are a full and proper assessment of 1) initial competency (ie., at the end of initial training), and 2) ongoing competency (ie., after initial training and done on some regular basis). The focus for both of these is assurance of competency when doing the work (both initial and ongoing).	This might be a place to point out the value or need for professional certification as a means for assessing both these things.	Partial Accept: Covered in Conformance 5.1.2

110	Brent Ostrum	4.5 and Annex B	E	<p>There is absolutely nothing in this section unique to FDE.</p> <p>I don't think this information is needed at all but, if it is, then it should be done by using references, not duplication. To that end, there is no need to replicate the National Code of Professional Responsibility as an appendix. Just refer to it in the text and provide a link to it.</p>	<p>Replace entire section with "Forensic document examiners shall perform other general responsibilities common to all Forensic Service Providers (per NCFS document "Defining Forensic Science and Related Terms", rest of ref) and outlined in [whatever document was the source for the list presently in the document].</p> <p>Delete Annex B.</p>	<p>Partial Accept: Delete bullet point items and replace with "The forensic document examiner shall perform other general responsibilities common to all forensic service providers or document the reason(s) for not performing the action — e.g., maintaining chain of custody for all items submitted and other requirements as set forth in The National Code of Professional Responsibility for Forensic Science and Forensic Medicine Service Providers from the National Commission on Forensic Sciences (included as Annex B) or The Code of Professional Responsibility for the Practice of Forensic Science from the U.S. Department of Justice (included as Annex C).</p> <p>Other bullet points are covered in Competency 5.1.2.</p> <p>It is prudent to include the full text of the referenced item in Annex B.</p>
111	Brent Ostrum	5.1	E	<p>The ASB guide indicates "When a standard is not written to support conformity assessment, the standard specifies that condition." Therefore there is no actual need to address conformance unless it makes sense.</p> <p>As presently written this document does not support conformity assessment.</p> <p>OTOH, the entire document might be seen as a 'conformity assessment' guideline for someone professing to be a qualified FDE. In which case, the section on conformance should outline acceptable means by which someone can prove that they meet the requirements of the document.</p>	<p>If taken in the latter way, replace 5.1 with a statement like "All persons professing to be a competent and qualified forensic document examiner shall provide documentation for all aspects of their training and other elements outline in this guide, as well as the results of any inspection or 3rd party review they may have undergone."</p>	<p>Partial Accept: The CB feels that the current wording of 5.1 is appropriate. Commentator's concerns are addressed by changes to 5.1.2</p>
112	Brent Ostrum	Annex A	E	<p>Annex A does not speak to 'foundational principles'. It is a rehash of info found in the main document.</p> <p>In general and given the broad range of methods applied in FDE, this topic should be addressed in terms of individual methods or practises. As such, it would best be addressed in documents designed for each such method/procedure. For example, a handwriting examination based on different foundational principles than an examination of typewriting.</p> <p>Having said this it is possible to outline some basic principles common to the basic comparison methods used by FDEs.</p> <p>Note that these are not really 'unique' to FDE unless we discuss them in terms of those facets of documents to which they are applied.</p>	<p>The principles underlying all forms of forensic 'identification' work are statistical/probabilistic in nature. The key, and most basic, concept underlying all 'identification' sciences is the concept that within-source variation will be less than between-source variation (either overall or with respect to some specified feature or metric of interest).</p> <p>So long as that condition is true (or is a reasonable assumption that can be made) it is possible to make useful inferences about a specified source versus other alternative source(s). The degree of accuracy or reliability for those inferences should be (empirically) determined.</p>	<p>Reject: Annex A addresses only the foundational principals of this Scope document. The excellent text of the Proposed Resolution should be expanded by the commentator and might be useful for technical standards to come.</p>
113	Kevin Kulbacki	4.2.1	T	<p>Should include the detection and decipherment of latent indentations (currently omitted);</p>		<p>Accept</p>
114	Kevin Kulbacki	4.4.3	T	<p>Should add mention to maintaining thorough documentation of initial training (The SWGDOC standard mentions the following with respect to documentation of training: "A training record for each trainee will be maintained." While this directs documentation for the training record of a trainee, no where is there a requirement for the training record of an FDE to be maintained post-training in either this or the SWGDOC standard. I believe the onus should also be on anyone claiming to be a FDE to have a record of their training.)</p>		<p>Partial Accept: Covered in Conformance 5.1.2</p>
115	Peter Tytell	4.2.1 - First Bullet Point	E	<p>change to "source(s) of writing" (delete "hand") to conform with usage below at 4.2.2 first bullet point.</p>		<p>Accept</p>
116	Peter Tytell	4.2.2 - Fifth Bullet Point	E	<p>Change to "the comparison of character edge fracture pattern(s) and paper fiber . . . " That's what an FDE does for such exams.</p>		<p>Reject: Too detailed; restricts coverage of this topic.</p>
117	Peter Tytell	4.2.2 - Last Bullet Point	E	<p>add "e.g.," and change order of items in parenthesis "(e.g., typewriting, printing, paper, watermarks, ink)"</p>		<p>Accept</p>

118	Peter Tytell	4.3.2 Third Bullet Point, last full line	E	add "the" to read "resolution and color balance for the intended purpose(s)"		Accept
119	Peter Tytell	4.3.3, second paragraph, last sentence	E	Consider moving to the end of 4.3.1 or having this "should" sentence in both places.		Accept: move this sentence to the end of 4.3.1.
120	Peter Tytell	5.1.1 last line	E	Change "may" to "might"		Accept
121	Peter Tytell	Annex A fourth line	E	add "to" before "properly" to balance the prepositional phrases, so the passage will read "...to effectively apply appropriate scientific and technical methodologies to properly evaluate ..." " ... To		Accept