

Deadline of Submission of Comments: 28-Oct-24

Document Number: ANSI/ASB Std 076

Document Title: Standard for Training and Certification of Canine Detection of Human Remains: Human Remains on Land

Comment #	Document Section	Current Document Wording	Proposed Revision	<i>For Working Group and Consensus Body use only, not to be completed by commenter.</i>
				Final Resolution
1	Generally	<p>This is not a reality based standard. It is too prescriptive. The legal ramifications (defense teams reliance) will put handlers in situations of gross civil liability that this standard will make indenfensible. It is not accurate to say that it is "voluntary." It is also not adequate to refuse comments from those in the field and say that ASB has "decided" that it needs to be a standard. It is admittedly untested and should not be "tested" on the handlers to generate more studies.</p>		<p>Reject with modification. From the perspective of ASB and ANSI, the standard is "voluntary". Though the CB understands that from a legal perspective the consideration would be that of not "voluntary".</p> <p>In order to alleviate concerns regarding the term "organization" in regards to canine teams, a definition of "organization" has been added to include a single canine team.</p> <p>Regarding the comments on the requirements and recommendations in this document being untested. The foreword does address the issue. The ASB Dogs and Sensors Consensus Body has voted to have this document.</p>
2	Forward	<p>Please insert "We believe" at the start of the second sentence in the first paragraph of the Forward.</p>		<p>Reject. Standards allow organizations and professions to create quality systems, policies, and procedures and maintain autonomy from vested interest groups. They ensure desirable characteristics of services and techniques such as quality, reliability, efficiency, and consistency among practitioners. Objective science applied in a uniform way through consensus-based standards further promotes fairness and outcomes based on evidence rather than subjective bias resulting from preconceived opinions. By focusing directly on the development and implementation of forensic science standards, the ASB contributes to the body of reliable data, thus decreasing the impact of bias in the justice system. Reliable data can positively impact the equal application of justice for all individuals.</p>
3	Forward	<p>The second sentence in the third paragraph of the Foreword should be changed to the following: Although validated training standards are the goal, this is a consensus-based training document recommended by these selected professionals that we believe, when followed correctly, will increase standardization. Standardization is a form of quality control that seeks to improve consistency in canine detection results, independent from validation. We believe the result will be increased repeatability and reproducibility within the discipline while necessary research develops.</p>		<p>Reject. Without standards there is no standardization. The full paragraph fully and appropriately describes the purpose of this document.</p>

4	Forward	Change surpassed to met in the second sentence in the sixth paragraph of the Forward and delete the word "minimum" in this sentence.		Reject with modification: This section was not a redline portion of the document, therefore it was not open for comment. The CB reviewed the comment and has modified "surpassed" to "passed".
5	Forward	The second sentence in the sixth paragraph of the Forward will not be achieved because this standard's prescribed requirements for an assessor, as defined in 3.6, fall well short of what is professionally required from such professionals. See further recommendations herein.		This section was not a redline portion of the document, therefore it was not open for comment.
6	Forward	The last sentence in the sixth paragraph states that standardization is a form of quality control and a way to increase consistency in canine detection results, independent from validation. Until the formal professional accreditation requirements of the assessor are developed for this and other proposed standards, then this and other proposed standards should be field-tested by a statistically significant number of canine teams and assessors that meet the accreditation requirements. Otherwise, an unproven standard with numerous odor availability and movement assumptions could affect canine teams' reliability adversely.		This section was not a redline portion of the document, therefore it was not open for comment.
7	3	Please insert a definition for Modified-Double Blind under Terms and Definitions.		Accept with modification: This section was not a redline portion of the document, therefore it was not open for comment. The CB did review the comment, and modified the definition for "double-blind assessment/double-blind testing" to include "or the assessor is not in a position to influence the outcome (i.e., two-way glass, video monitoring, physical barriers, great distance)." at the end of the definition
8	3	The standard is for "human remains" but that term is not defined.	Please define "human remains" in the terminology	Accept. This section was not a redline portion of the document, therefore it was not open for comment. The CB did decide to add a definition.
9	3.3	A vigilance aid is not an alternative aid. A vigilance aid is defined by it's function. An alternative aid is defined by it's manufacture.	Remove the reference to a vigilance aid in this definition.	This section was not a redline portion of the document, therefore it was not open for comment.
10	3.4	Revise the definition:	Using a canine team to search a designated area for a target odor.	This section was not a redline portion of the document, therefore it was not open for comment.
11	3.5	Revise the definition as follows:	An evaluation during training to assess a canine team's ability to search accurately.	This section was not a redline portion of the document, therefore it was not open for comment.

		<p>The existing definition shall be replaced with the following: The assessor shall have the authority to conduct assessments. They shall have either of the following levels</p>	<p>Be a retired law enforcement canine trainer/handler who has the following training:</p> <ul style="list-style-type: none"> They were nationally certified with or have trained a detection canine with a law enforcement agency and handled a canine for a minimum of three years; They have an understanding of how to conduct an odor recognition assessment properly, including mitigating potential cross-contamination of containers; They have received practical training in how the odor signature is emitted from human remains and how the odor plume is dispersed through the various certification/assessment environments; They have received training techniques to mitigate potential inadvertent cueing by an assessor to the canine teams; The assessment rules under this standard and the selection of target substances for the assessments; They have a practical understanding of the advantages/disadvantages of assessments conducted using double-blind, modified double-blind, and single-blind; They may utilize modified double-blind and single-blind assessments when conducting proficiency assessments; They have an understanding of the assessment rules under this standard and the selection of target substances for the assessments; They know how to properly conceal the training aids in various environments, including proper techniques for setting elevated and buried training aids; and They have received training on handling training aids, including biological hazards, and the selection of training aids for assessments/certifications. They shall be accredited trainers with a national certifying organization in human remains detection who possess the following qualifications: <ul style="list-style-type: none"> Using their training curriculum, they have trained a green dog in human remains detection, including off-leash obedience, and have certified the canine with a bona fide national certifying organization. Must be a canine handler for two years. 	
			<ul style="list-style-type: none"> At least one Certifying Official (See Certifying Official definition) has critiqued them during a human remains detection certification. They have at least 25 documented critique hours with a minimum rating of good. During the accreditation period, the applicant must submit at least one critique form annually from a master trainer other than the “recommending” master trainer. The Certifying Official “recommending” the assessor shall have worked with the candidate a minimum of 50 hours and write an evaluation scoring the relevant skill of the candidate. The candidate's critique form(s) and the recommending Certifying Official shall submit their written review of the assessor candidate to an accreditation chairperson within the organization. The critique process shall include training the candidate in the advantages/disadvantages of assessments conducted using double-blind, modified double-blind, and single-blind. The applicant shall have received training in the following matters: <ul style="list-style-type: none"> How to properly conduct an odor recognition assessment while mitigating potential cross-contamination of containers; How the odor plume emitted from human remains is dispersed through the various certification/assessment environments; How to identify the early warnings of heat and cold injuries in canines; Proper techniques to mitigate potential inadvertent cueing by the certifying official/assessor to the canine teams; How to assess whether a canine team is working effectively, including the estimated time a search should take based on the area's size, terrain, and environmental conditions; How to properly assess an acceptable canine-trained final response when the target substance is elevated within a search area. 	

of professional qualifications:

The assessment rules under this standard and the selection of target substances for the assessments;
How to properly conceal the training aids in various environments, including proper techniques for setting elevated and buried training aids; and
Proper handling of training aids, including biological hazards, and the selection of training aids for assessments/certifications.

The candidate shall submit an accreditation package to the certifying organization's accreditation chairperson at least 90 days before the accreditation testing.
The assessor accreditation package shall include the following:
A letter from their sponsoring Certifying Official, which shall consist of an evaluation of the following:
List any certifications they have done for the applicants and their dog and canine teams they have trained;
Document the approximate number of hours that they have worked with the applicant;
The Certify Official's personal knowledge of the individual's participation in the organization's activities; and
Any other information that is relevant about the applicant.

The application package submitted to the accreditation chairperson by the candidate shall include the following:
At least one letter of recommendation by the recommending Certifying Official;
A current resume accounting for their experience working with human remains detection dogs, their length of time as a handler/assessor, copies of applicable certificates, critiques...etc;
Their reasons for applying for the accreditation;
A copy of their training course curriculum they offer for training human remains detection dogs on land.
This course shall be at least [160] hours for a human remains detection canine working solely on land.
The applicant shall sign a waiver for an employment background check.
The applicant must submit with their accreditation package the following information:
A letter on their department letterhead stating the dates of their employment, position, a job description, and must include a list of human remains detection canines that they have trained for their department (this letter shall state whether the applicant's dogs was a complete training course or regular maintenance training.

The applicant must include a letter on department letterhead from any department for which human remains detection dogs were trained by the applicant. This letter shall also state whether the training of his dogs was complete training or regular maintenance training.
The applicant must pass a written examination (a minimum of 80% is required to pass) at the accreditation committee before appearing before the oral examination board.
Applicants for assessors denied accreditation must wait at least six months before retesting.
An applicant who is denied accreditation shall only appear for testing a total of two times before the applicant must start the complete process over, including all critique hours and hours working with a Certifying Official.
The accredited Assessor must meet ongoing continuing education requirements, submit an updated resume annually, and remain active in conducting at least one assessment annually.
The accredited Assessor shall conduct assessments of human remains detection canine teams using modified double-blind or single-blind methods, and at least one assessment element shall be performed using a modified double-blind method.
Using their training curriculum, they trained three green dogs to detect the odor of human remains, including off-leash obedience. The canines were certified by a bona fide national certifying organization.

Reject: Shall statements (requirements) are not permitted in definitions per the ASB Manual (<https://www.aafs.org/academy-standards-board/asb-documents-and-forms>)

13	3.9	The note does not specify the location of the blood in reference to the age.	I suggest it be specified that the blood described here is outside of the body, not inside of the body. This would clarify that the note is not referring to the age of the subject or the regeneration of cells within the body.	Accept.
14	3.13	Note, the certifications include odor recognition which is not operational.	Modify the note to read "Certifications are comprised of assessments" or Certifications are comprised of odor recognition and operational assessments."	Reject. This definition has been approved to be used across ASB Dogs and Sensors consensus body documents.
			<p>The candidate must be an assessor for at least three consecutive years unless already a certifying official under another discipline.</p> <p>At least one Certifying Official (See Certifying Official definition) has critiqued them during a human remains detection certification. They have at least 50 documented critique hours with a minimum rating of good. Applicant must submit at least one critique form from a master trainer other than the "Recommending" master trainer annually.</p> <p>The Certifying Official recommending the assessor shall have worked with the candidate a minimum of 100 hours and write an evaluation scoring the relevant skill of the candidate.</p> <p>The candidate's critique form(s) and the recommending Certifying Official shall submit their written reviews of the certifying official candidate to an accreditation chairperson within the organization.</p> <p>Applicant must submit at least one critique form from a Certifying Official other than the "Recommending" Certifying Official annually.</p> <p>The Certifying Official recommending the assessor as a certifying official shall have worked with the candidate for a minimum of 100 hours and written an evaluation scoring the candidate's relevant skills.</p> <p>The candidate's critique form(s) and the recommending Certifying Official shall submit their written review of the candidate to an accreditation chairperson within the organization.</p> <p>The critique process shall include training the candidate in the advantages/disadvantages of assessments conducted using double-blind, modified double-blind, and single-blind.</p> <p>They have received training on how to properly conduct an odor recognition assessment while mitigating potential cross-contamination of containers;</p> <p>How the odor plume emitted from human remains is dispersed through the various certification/assessment environments.</p> <p>How to assess whether a canine team is working effectively, including the estimated time a search should take based on the area's size, terrain, and environmental conditions.</p> <p>How to properly assess an acceptable canine-trained final response when the target substance is elevated within a search area.</p> <p>How to identify the early warnings of heat and cold injuries in canines.</p> <p>Proper techniques to mitigate potential inadvertent cueing by the certifying official/assessor to the canine teams.</p>	

15	3.15	<p>The Certifying Official shall have the authority to certify dogs under this standard. They shall have the following level of professional qualifications:</p>	<p>The assessment rules under this standard and the selection of target substances for the assessments. How to properly conceal the training aids in various environments, including proper techniques for setting elevated and buried training aids. Proper handling of training aids, including biological hazards, and the selection of training aids for assessments/certifications. The candidate shall submit an accreditation package to the certifying organization's accreditation chairperson at least 90 days before the accreditation testing. The candidate shall submit an accreditation package to the certifying organization's accreditation chairperson at least 90 days before the accreditation testing The certifying official accreditation package shall include the following: A letter from their sponsoring Certifying Official, which shall consist of an evaluation of the following: List any certifications they have done for the applicants and their dog and canine teams they have trained; Document the approximate number of hours that they have worked with the applicant; The Certify Official's personal knowledge of the individual's participation in the organization's activities; and Any other information that is relevant about the applicant. The application package submitted to the accreditation chairperson by the candidate shall include the following: At least one letter of recommendation by the recommending Certifying Official; A current resume accounting for their experience working with human remains detection dogs, their length of time as a handler/assessor, copies of applicable certificates, critiques...etc; Their reasons for applying for the accreditation; A copy of their training course curriculum they offer for training human remains detection dogs on land. This course shall be at least 160 hours for a human remains detection canine working solely on land.</p> <p>The applicant shall sign a waiver for an employment background check. The applicant must submit with their accreditation package the following information: A letter on their department letterhead stating the dates of their employment, position, a job description, and must include a list of human remains detection canines that they have trained for their department (this letter shall state whether the applicant's dogs was a complete training course or regular maintenance training. The applicant must include a letter on department letterhead from any department for which human remains detection dogs were trained by the applicant. This letter shall also state whether the training of his dogs was complete training or regular maintenance training. The applicant must pass a written examination (a minimum of 80% is required to pass) at the accreditation committee before appearing before the oral examination board. Applicants for assessors who are denied accreditation must wait a minimum of one year before retesting. An applicant who is denied accreditation shall only appear for testing a total of two times before the applicant must start the complete process over, including all critique hours and hours working with a Certifying Official. The accredited Assessor must meet ongoing continuing education requirements, submit an updated resume annually, and remain active in conducting at least one assessment annually. The accredited Assessor shall conduct assessments of human remains detection canine teams using modified double-blind or single-blind methods, and at least one assessment element shall be performed using a modified double-blind method.</p>	<p>Reject: Shall statements (requirements) are not permitted in definitions per the ASB Manual (https://www.aafs.org/academy-standards-board/asb-documents-and-forms)</p>
16	3.15	<p>Certifying official definition verifies that a k9 handler team performs to a particular standard.</p>	<p>"has performed to a particular standard"</p>	<p>Reject. This definition has been approved to be used across ASB Dogs and Sensors consensus body documents.</p>

17	3.16	"The canine's initial change of behavior typically leads to following the odor to its source/target." That is the goal, but the canine technically should lead to the highest concentration of odor.	Adjust language accordingly.	Reject. This definition has been approved to be used across ASB Dogs and Sensors consensus body documents.
18	3.27	"Assignment of a canine team in an operational environment." Canine teams may also train in an operational environment.	Please specify that a deployment is in an operational environment and is not training.	This section was not a redline portion of the document, therefore it was not open for comment.
19	3.31	Double Blind assessment definition needs to be modified. needs to be 1-2 sources. If 0 a completely untrained dog can take the test and pass because they will indicate nothing. This definition needs to change for practical application of tests on numerous teams during testing events.	the canine handler does not know the location of the target odor or whether target odor is present (i.e., a blank/null search) and the assessor may know the location and whether a target odor is present but is not in a position to influence the canine handler or K9's response (i.e. positioned at a distance, behind a barrier, or other neutral arrangement.)	Accept with modification: This section was not a redline portion of the document, therefore it was not open for comment. The CB did review the comment, and modified the definition for "double-blind assessment/double-blind testing" to include "or the assessor is not in a position to influence the outcome (i.e., two-way glass, video monitoring, physical barriers, great distance)." at the end of the definition
20	3.34	3.34 false hole - You deleted the evaluator definition in 3.30.	Should it also be deleted in this definition? Modify the definition to include the minimum distance a false hole shall be from a target substance.	This section was not a redline portion of the document, therefore it was not open for comment.
21	3.40	This standard addresses detecting an odor signature emitted from human remains.	Remove scent recognition from the definition.	This section was not a redline portion of the document, therefore it was not open for comment.
22	3.48	Revise the "Note" as follows:	"Odor" traditionally refers to a canine's detection of an odor signature emitted from a target substance.	Reject. This definition has been approved to be used across ASB Dogs and Sensors consensus body documents.
23	4.1.2	The word "shall" is inappropriate unless you can reference specific scientific research concluding that <u>all</u> the prescribed requirements are required to train the canine handler properly. Otherwise, please delete shall and insert may.		This section was not a redline portion of the document, therefore it was not open for comment.
24	4.1.2r	how is "effect of odor/scent dispersion" legal? And I thought "scent" was being defined in the document as wrt live humans. And the reference documents are "legal?"	Give "effect of odor dispersion" it's own letter not under "r. Relevant legal aspects."	Reject with modification: Odor dispersion is included in f), it is appropriate to also have it under relevant legal aspects. For clarification "articulate the" was added at the beginning of the item.
25	4.1.4	Between 4.1.4 and 4.1.5 is "The handler shall understand how the training aids are used, to include:"	This sentence should have it's own numbering?	Accept.
26	4.1.4	Hair and finger/toe nails are not mentioned	Please note whether or not hair and finger/toe nails are considered human decomposition	Accept with modification: note has been modified for clarification.
27	4.1.4	Teeth - Should they be untreated or burned? It is specified for bone, so should also be specified here	Please note whether or not the teeth should be untreated or burned	Accept. Untreated post removal, and burned added to f)
28	4.14	Missing requirement number for "The handler shall understand how the training aids are used, to include:"	"The handler shall understand how the training aids are used, to include:" I think is a 4.1.5	Accept.

29	4.1.5	This sentence is undefineable and unenforceable as a shall. To say that the handler shall be trained in search techniques to maximize performance is another issue. ""4.1.5 In order to maximize search efficiency, canine handler training shall include search techniques. which maximize the canine's opportunity to encounter target odor(s).	Either get rid of 4.1.5 or move it to a section of what the handler shall train	Reject with modification. This section is appropriate in the handler training section as the handler needs to know how to maximize search efficiency. The section was modified for gramatical clarification.
30	4.2.1.1 & 4.2.1.2	This stand shall have an obedience control test on a pass-or-fail basis, which should be conducted before a canine team assessment and a certification. The obedience control test will allow the assessor/certifying official to assess the dog's aggressiveness and the handler's control of the canine. The obedience control test should include off-leash obedience heeling (slow, normal, and fast pace), a three-minute stay with the handler 15 feet away from the canine, and an emergency stop exercise. If a canine team fails the obedience control test, then the canine team will not participate in an assessment or certification.		This section was not a redline portion of the document, therefore it was not open for comment.
31	4.2.1.7	See note 5	Please note whether or not hair and finger/toe nails are considered human decomposition	Accept with modification: note has been modified for clarification.
32	4.2.1.7	See note 6	Please note whether or not the teeth should be untreated or burned	Accept. Untreated post removal, and burned added to f)
33	4.2.1.8	Statement is redundant with 4.3.1	Delete 4.1.1.8	This section was not a redline portion of the document, therefore it was not open for comment.
78	5.1 & 5.5	As written, the definition of a training aid does allow for it to be used in a certification assessment (Section 3.68 "Training odor sources used for training.")	Please adjust either section 3.68 or section 5.5 accordingly	Accept. Definition revised for clarification. 5.5 also revised for clarification.
34	5.5	The definition should be reworded as follows:	The training aid(s) used for assessments shall be chosen from the complete spectrum of decomposition that is consistent with the canine team's mission.	Accept with modification. Definition of Training Aid has been modified for clarification.
35	5.5(c)	may only apply to a few teams, depending on their geographic area.	Please clarify that the training aids selected shall be consistent with the canine team's mission.	Reject. Mummified remains fall within the full scope of decomposition.
79	5.5	Ambiguous requirement: "5.5 Target odorTraining aid(s) used for assessments shall be the complete spectrum of human decomposition." As written, this implies each assessment includes ALL spectrum of decomp. This is impossible. Needs to be clarified.	Possible correction? 5.5 Target odorTraining aid(s) used for assessments shall be selected from the full spectrum and odor threshold of human decomposition as described in section 4.2.1.7 .	Accept with modification. Definition of Training Aid has been modified for clarification.
80	5.5.1	5.5.1 Target odorTraining aid(s) shall be comprised of the following examples	Suggest: 5.5.1 Target odorTraining aid(s) shall be selected from the following examples:	Accept.
81	5.5.1	See note 5	Please note whether or not hair and finger/toe nails are considered human decomposition	Accept with modification: note has been modified for clarification.
82	5.5.1	See note 6	Please note whether or not the teeth should be untreated or burned	Accept. Untreated post removal, and burned added to f)
83	5.5.2a	"Containers shall be as permeable as possible..." (section 5.5.2) and "A variety of training amounts..." (section 4.2.1.5) These two statements could be contradictory as an odor restricting cap could be used in training.	Please clarify or remove references to training in section 5	Reject. Section 4 is training, Section 5 is assessments, so it is appropriate and not contradictory as the intent of each section is different.

84	5.5.2 c	punctuation and word choice change: ...sparingly, pure training aid(s) should be prominently used [13,2714,33]	edit to: "sparingly. Pure training aid(s) should be predominantly used [13,2714,33]"	Accept.
85	5.6	Science, field experience, and data collection shows that dogs do not generalize large quantities when only trained /tested on small quantities.Example Case Study: An Evaluation of Detection Dog Generalization to a Large Quantity of an Unknown Explosive in the Field The amounts in this standard DO NOT reflect mission requirements at all. "A minimum of 0.5 lb (227 g) of training aid(s) shall be used for buried operational assessments. A minimum of 0.0103 lb (515 g) of training aid(s) shall be used for all other assessments."	These quantities need to be increased dramatically as do the search size areas. Small quantities are addressed with smears on vehicle/interior searches but have no place in the wilderness environment. Our real life searches are most often tracked in miles not yards. Full body, limbs, body burn, not a fingertip.	Reject. These minimums are the current industry standards, and they are minimums.
36	5.6	Please explain how the minimum of 0.5 pounds of training aids was determined and tested for buried training aids in various soil types, how the set time for buried training aids was established, and the prescribed level of decomposition of the training aid. Please explain how the 0.03 pounds of training aids were determined and field-tested for other search areas, including the prescribed level of decomposition.		Reject. These minimums are the current industry standards, and they are minimums.
86	5.8.1.1.1	ORT - again, NOT REALITY BASED. Context is a real thing in working a dog. A dog that understands the context of can lineups (successful with ORT) will still false on non target odors when placed in search areas.	Get rid of the ORT entirely or replace it with lineups of reality based searches which will also show foundation skills similar to ORT:trash bags, trash cans, tools, clothing piles...something that we actually have to do in the field.	This section was not a redline portion of the document, therefore it was not open for comment.
37	5.8.1.1.2(f)	In the Forward section, standardization also leads to general improvements in reproductivity between canine teams or across time for a particular team. Even though these protocols have not been validated, having detailed protocols like the ones described in this standard is expected to increase the likelihood that different canine teams trained under this regimen react the same way to the same evidence or materials. Thus, standardization is a form of quality control and a way to increase consistency in canine detection results, independent from validation. However, the odor recognition assessment states a minimum of six containers shall be used. The sample containers shall be spaced a minimum of 3 feet apart and arranged to minimize contamination of containers.	A minimum of one training aid shall be randomly placed among sample containers, and a minimum of four different distractor odors shall be used; the training aids shall be placed a minimum of 30 minutes before the assessment begins. There is no consistency other than inconsistency among possible assessors. Depending on the size of the distractors versus the target training aid, the spacing between containers, the set time, and the high vapor pressure of human remains substances; there is a high possibility that the containers will be cross-contaminated. To minimize cross-contamination, the containers need to be spaced at least six feet apart. The spacing should depend on the size of the distractors and the amount of target substance. The size of the training aid is prescribed, but the size of the distractor is unlimited. This is a poorly structured evaluation with a high chance of cross-contamination, especially when multiple teams are involved in the odor recognition assessment.	Reject with modification. The section contains sufficient restrictions to minimize cross contamination. Additionally f) 2) is a minimum so a larger distance can be utilized. "and training aids" added to the end of f) 2).
87	5.8.1.1.2 F 4)	"six stable total" What is a stable container?	Delete stable or replace stable with sample	Reject with modification. The intent is that the container not have the ability to be knocked over. "physically" added before "stable" for clarification.

88	5.8.1.1.2f4	A minimum of 1 training aid in use will not prove that a canine can properly discriminate a blank search area from an odor. In an odor recognition test, the ability to identify the absence of the odor is essential in proving that the canine can discriminate their target odor, not just <i>any</i> novel odor. The canine should be able to correctly complete a search without a positive final alert, and demonstrate that during odor recognition.	Recommend the allowance for a blank search during assessments	Reject: There is no limitation to running completely blank ORTs outside of this specific assessment. This assessment describes the parameters for setting up an ORT.
89	5.8.1.1.2 h	30 minutes set time will likely result in odor spread/cross over to other containers. If a dog must be trained to do an ORT, then it should know to deep nose into each container. It does not require 30 minute set time especially if palced only 3 feet apart.	5 minute set time for ORT should be sufficient and prevent odor spread across containers.	Accept. Though this section was not a redline portion of the document, and therefore it was not open for comment, the CB discussed the comment and has agreed to modify the section as requested.
38	5.8.1.2.2	In the last sentence, delete or at the conclusion of the entire assessment.	This is a single-blind assessment; the handler should be able to reward the canine immediately.	Reject with modification. This section gives the flexibility to reward immediately or intermittently. The sentence has been revised for clarification.
39	5.8.1.2.7	If the assessor places distractors in the search area, what is the purpose of conducting an odor recognition evaluation?		Reject with modification. There is no resolution provided. The section has been revised for clarification.
90	5.8.1.2.12	Currently reads "...5.9.1.2.12.1 through 5.9.1.2.12.6."	Please correct to "...5.8.1.2.12.1 through 5.8.1.2.12.6."	Accept. Editorial fix made.
91	5.8.1.2.12	"Operational assessments to include..." should read "Operational assessments should include..."	Correct language for editorial purposes and to allow to for the optional assessments based on Table 1	This section was not a redline portion of the document, therefore it was not open for comment.
92	5.8.1.2.12.1 & 5.8.1.2.12.2b	Currently states "...one (1) acre or 43,560 ft ² (4,046 m ²)..." Please correct to 4,047 m ² .	Please correct to 4,047 m ² .	Accept.
40	5.8.1.2.12.1	In the Forward section, standardization also leads to general improvements in reproductivity between canine teams or across time for a particular team. Even though these protocols have not been validated, having detailed protocols like the ones described in this standard is expected to increase the likelihood that different canine teams trained under this regimen react the same way to the same evidence or materials. Thus, standardization is a form of quality control and a way to increase consistency in canine detection results, independent from validation.		No actionable recommendation provided.
41	5.8.1.2.12.1	Why is there such variability in the size and number of areas among possible certifications/assessments (e.g., a minimum of three areas, a minimum of one acre, and a minimum total assessment search of three acres)?		Reject. No actionable recommendation provided. These requirements are minimums and one can exceed the requirements.

42	5.8.1.2.12.1(a)	<p>In the Forward section, standardization also leads to general improvements in reproductivity between canine teams or across time for a particular team. Even though these protocols have not been validated, having detailed protocols like the ones described in this standard is expected to increase the likelihood that different canine teams trained under this regimen react the same way to the same evidence or materials. Thus, standardization is a form of quality control and a way to increase consistency in canine detection results, independent from validation.</p>	<p>There needs to be more standardization within the certification/assessments. A minimum of three areas does not lead to standardization or a fair comparison of different canine teams' capabilities.</p>	<p>This section was not a redline portion of the document, therefore it was not open for comment. These requirements are minimums and one can exceed the requirements.</p>
43	5.8.1.2.12.1(i)	<p>I do not believe the prescribed 33-foot distance is reasonable when an elevated training aid or a trace amount is downwind of another 0.5-pound target substance. This would require the sweep widths to be narrower to maintain the probability of detection, which would consume too much of the allotted search time.</p>	<p>Trace amounts should be removed from the wilderness assessment.</p>	<p>Reject with modification. Trace amounts are permitted, but not the only option for the training aid within this assessment. Additional information added to the section "or shall be placed in such a manner to mitigate the possibility of target odors being encountered at the same time."</p>
44	5.8.1.2.12.1(k)	<p>The handler shall be told the set time before starting the exercise because the set time will influence the handler's search strategy, including but not limited to the sweep with the canine.</p>		<p>This section was not a redline portion of the document, therefore it was not open for comment.</p>
45	5.8.1.2.12.1(l)	<p>The 30-minute assessment time is arbitrary and should be based on the size of the area, the size of the target substances, the ambient temperature, the terrain within the area, changes in elevation within the area, the extent of vertical surfaces, the wind speed, temperature, humidity...etc.</p> <p>The handler may review the search area for possible hazards, gain an understanding of the terrain and shade within the search area, assess the extent of vertical surfaces, ground cover... etc., and see an overview of the area to formulate their search strategy BEFORE the assessor/certifying official starts the time.</p> <p>The assessor/certifying official will extend the search time if the canine team is working effectively within the area.</p>		<p>Reject with modification. This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>For additional clarification, an additional sentence was added to the end of the section: "The time allotment may also be increased by the assessor if an unplanned event or circumstance impacts a specific team during the assessment [e.g., animal(s) that may introduce a safety issue in the search area, weather hazard, or other safety issues]."</p>

46	5.8.1.2.12.2(a) and (b)	<p>Buried Operational Assessments - The assessment shall be a minimum of two individual areas and a minimum search area size. The certifying official/assessor may create an unlimited number of search areas. The Forward section of this proposed standard states, in part, that "standardization also leads to general improvements in reproductivity between canine teams or across time for a particular team. Even though these protocols have not been validated, having detailed protocols like the ones described in this standard is expected to increase the likelihood that different canine teams trained under this regimen react the same way to the same evidence or materials. Thus, standardization is a form of quality control and a way to increase consistency in canine detection results, independent from validation."</p>	<p>To promote consistency while conducting assessments and certifications, a specific number of areas, including the prescribed size, should be designated. Revise the standard to include a specified number of search areas, including consistency in the areas' respective sizes and target substances' sizes.</p>	<p>This section was not a redline portion of the document, therefore it was not open for comment.</p>
47	5.8.1.2.12.2 et al.	<p>A minimum of one search area shall contain one (1) training aid.</p>	<p>There is no consistency when section 5.6 prescribes a minimum of 0.5 pounds of training aids shall be used for all other assessments. What has the ASB Staff done to field test odor availability for a minimum of 0.5 pounds of human remains in different soil types, including the prescribed set time of six hours? The six hours is too short a minimum set time for buried substances in red clay. The size and kind of target substance, including the level of decomposition and depth of the buried substance, should be better specified to promote consistency and repeatability.</p>	<p>Reject. No actionable recommendation provided. The numbers and set times are based on current industry practices, as no peer reviewed practices are available at this time. These requirements are minimums and one can exceed the requirements.</p>
48	5.8.1.2.12.2 (g)	<p>(g) The definition regarding the number of training aids should be clarified because (f) states the remaining buried areas shall have zero (0) to one (1) training aid per each buried area. There are also conflicting requirements when there is more than one buried training aid under (i), which defines spacing when there is more than one training aid in an area.</p>		<p>This section was not a redline portion of the document, therefore it was not open for comment.</p>
49	5.8.1.2.12.2 (h)	<p>(h) How does the variability in the minimum and maximum depths promote consistency and repeatability? How was the minimum and maximum depth determined?</p>	<p>Add some guidance, function of target substance size, age of decomposition, soil type...etc.</p>	<p>Reject. This section was not a redline portion of the document, therefore it was not open for comment. Consistency is maintained by allowing evaluators to implement their local knowledge and individual discretion.</p>
50	5.8.1.2.12.2 (i)	<p>Item (i) States that if the individual search area contains two training aids, each training aid shall be separated by a minimum of 33 feet.</p>	<p>Please revise the definition: The distance between two training aids should be determined by the soil type, depth, and size of the training aids, including but not limited to terrain and environmental factors.</p>	<p>Reject with modification. Consistency is maintained by allowing evaluators to implement their local knowledge and individual discretion. Additional information added to the section "or shall be placed in such a manner to mitigate the possibility of target odors being encountered at the same time."</p>
51	5.8.1.2.12.2 (j)	<p>(j) How does this promote consistency and repeatability when there are unlimited false holes?</p>		<p>Reject with modification. No actionable resolution provided. Consistency is maintained by allowing evaluators to implement their local knowledge and individual discretion. Additional information added to the section "and shall be placed in such a manner to mitigate the collection of target odor on a false hole."</p>

52	5.8.1.2.12.2 (l)	(l) How could the assessor know the maximum search time before the first canine team conducts the sniff since the amount of odor available will be a function of soil type, depth, weather conditions, terrain, and surface area of the target substance?		Reject with modification. For additional clarification, an additional sentence was added to the end of the section: "The time allotment may also be increased by the assessor if an unplanned event or circumstance impacts a specific team during the assessment [e.g., animal(s) that may introduce a safety issue in the search area, weather hazard, or other safety issues]."
93	5.8.1.2.12.3	needs to be 1-2 sources. If 0 a completely untrained dog can take the test and pass because they will indicate nothing.	change to 1-2 sources	This section was not a redline portion of the document, therefore it was not open for comment. This assessment area can be completely blank. The ASB Dogs and Sensors CB agrees that this is appropriate.
53	5.8.1.2.12.3(a)	Urban Areas - How does an unlimited number of possible search areas promote consistency through repeatability?		This section was not a redline portion of the document, therefore it was not open for comment.
54	5.8.1.2.12.3(c)	The assessor cannot effectively evaluate a canine team's ability to mitigate detection risk when the area contains no target substance.	Why is this search different from the number of target substances prescribed for the area and buried searches?	This section was not a redline portion of the document, therefore it was not open for comment. This assessment area can be completely blank. The ASB Dogs and Sensors CB agrees that this is appropriate.
55	5.8.1.2.12.3(f) and (h)	The prescribed time is arbitrary and should be at the discretion of the certifying official based on environmental conditions, the size of the training aids used, the exterior surface of the building (metal v. Brick...etc.), the concealment depth...etc.		Reject with modification. Consistency is maintained by allowing evaluators to implement their local knowledge and individual discretion. Additional information added to f): "or shall be placed in such a manner to mitigate the possibility of target odors being encountered at the same time." For additional clarification, an additional sentence was added to the end of h): "The time allotment may also be increased by the assessor if an unplanned event or circumstance impacts a specific team during the assessment [e.g., animal(s) that may introduce a safety issue in the search area, weather hazard, or other safety issues]."
94	5.8.1.2.12.4	needs to be 1-2 sources. If 0 a completely untrained dog can take the test and pass because they will indicate nothing.	change to 1-2 sources	This section was not a redline portion of the document, therefore it was not open for comment. This assessment area can be completely blank. The ASB Dogs and Sensors CB agrees that this is appropriate.
56	5.8.1.2.12.4(a)	Having an unlimited number of areas does not promote consistency through repeatability.		Reject. This section was not a redline portion of the document, therefore it was not open for comment. Consistency is maintained by allowing evaluators to implement their local knowledge and individual discretion.

57	5.8.1.2.12.4(c)	The assessor cannot effectively evaluate a canine team's ability to mitigate detection risk when the area contains no target substance.	Why is this search different from the number of target substances prescribed for the area and buried searches?	This section was not a redline portion of the document, therefore it was not open for comment. This assessment area can be completely blank. The ASB Dogs and Sensors CB agrees that this is appropriate. Completely blank assessments are a valuable tool for canine proficiency assessments.
58	5.8.1.2.12.4(c)	The assessor cannot effectively evaluate a canine team's ability to mitigate detection risk when the area contains no target substance.	Why is this search different from the number of target substances prescribed for the area and buried searches (minimum of 1 target substance)?	This section was not a redline portion of the document, therefore it was not open for comment. This assessment area can be completely blank. The ASB Dogs and Sensors CB agrees that this is appropriate. Completely blank assessments are a valuable tool for canine proficiency assessments.
59	5.8.1.2.12.4(d)	Insert "on the" after based.		Accept
60	5.8.1.2.12.4(h)	The search time is arbitrary and without merit.	A properly trained assessor/certifying official can assess whether the canine team works effectively and terminate or extend the search time as appropriate.	This section was not a redline portion of the document, therefore it was not open for comment. As this is a recommendation, not a requirement, additional time or removal of time can be done as appropriate. The proposed resolution is covered by the existing statement.
95	5.8.1.2.12.5	needs to be 1-2 sources. If 0 a completely untrained dog can take the test and pass because they will indicate nothing.	change to 1-2 sources	Reject. This assessment area can be completely blank. The ASB Dogs and Sensors CB agrees that this is appropriate. Completely blank assessments are a valuable tool for canine proficiency assessments.
61	5.8.1.2.12.5(h)	The search time is arbitrary and without merit.	A properly trained assessor/certifying official can assess whether the canine team works effectively and terminate or extend the search time as appropriate.	This section was not a redline portion of the document, therefore it was not open for comment. As this is a recommendation, not a requirement, additional time or removal of time can be done as appropriate. The proposed resolution is covered by the existing statement.
96	5.8.1.2.12.6	The ability of assessors to acquire 10 vehicles is going to be difficult at best	A more reasonable number of vehicles	Accept. The section has been modified to a recommendation of 5 vehicles. Additional modifications to the section have been made to clarify this assessment.
62	5.8.1.2.12.6 et al.	The number of vehicles, including the prescribed requirement to exclude vehicles from a scrap yard, is devoid of what is available to conceal human remains on or within a vehicle.	This requirement was discussed with a senior human remains master trainer associated with Customs and Border Protection. The discussion occurred during an ASB meeting immediately before this proposed standard was released. The ASB Staff's inability to listen to the aforementioned industry expert, coupled with their rejecting approximately 65% of the comments that were previously submitted on the last draft of this proposed standard, is unacceptable. This proposed standard will NEVER be a consensus-based document when the staff repeatedly refuses feedback from practitioners in the field.	Please note that the ASB Staff does not determine the content of ASB documents. ASB documents are produced using an ANSI accredited process of consensus by the ASB Consensus Bodies. There was no proposed revision provided. The section on types of vehicles to be used for the testing has been modified to a recommendation from a requirement.

63	5.8.1.2.12.6(b)	Please clarify a maximum of one (1) training aid shall be used for every five vehicles.	Does that mean there should be two rows of five vehicles in the line-up?	This section was not a redline portion of the document, therefore it was not open for comment. Based on other comments, the section has been modified to a recommendation of 5 vehicles. Additional modifications to the section have been made to clarify this assessment. The configuration of the vehicles is determined by the assessor.
64	5.8.1.2.12.6(c) et al	A properly trained assessor/certifying official knows how and where to conceal a training aid on a vehicle. Delete i. through vii.		Reject. The qualifiers are for informative purposes to standardize assessments.
65	5.8.1.2.12.6(h)	When trace amounts are utilized for an assessment or certification, the set time must be extended beyond 30 minutes.		This section was not a redline portion of the document, therefore it was not open for comment. The requirement of 30 minutes in this section is a minimum.
66	5.8.1.2.12.6(j)	The search time of two minutes per vehicle is unrealistic for a line-up sniff of ten vehicles when trace amounts of human remains may be utilized. A minimum of three minutes may be a more appropriate time. The handler should be able to stop and break their canine after searching five vehicles. The vehicle line-ups are frequently in areas with limited shade and scorching ground surfaces. There is a high risk of the canine team suffering a deadly heat injury.		This section was not a redline portion of the document, therefore it was not open for comment. The requirement for 10 vehicles has been modified to a recommendation of 5 vehicles. This section is a recommendation and does allow for additional time "Based on the size of the vehicle and the complexity of the search, additional time per vehicle may be allowed"
67	5.8.2	A properly accredited assessor/certifying official can conduct <u>any</u> evaluation under this proposed standard on a double-blind, modified double-blind, or a single-blind basis. This standard shall be modified accordingly.		Reject. There is no proposed resolution. The definition of a double-blind assessment has been updated. There is no modified double-blind assessment.
97	5.8.2	Removed double blind assessments. Include double blind in maintenance training based on updated studies Effect of Handler Knowledge of the Detection Task on Canine Search Behavior and Performance...statistically similar accuracy rate under single and double blind conditions	Removed Section 5.8.2	Reject. This provides the parameters for double-blind assessments. The ASB CB has determined that double-blind assessments have merit and are essential.
		A nationally accredited assessor/certifying official may conduct odor recognition and operational assessments on a modified double-blind, double-blind, or single-blind following the components and parameters described in 5.8.1.		This section was not a redline portion of the document, therefore it was not open for comment. The definition of a double-blind assessment has been updated. There is no modified double-blind assessment.

68	5.8.2.1	<p>Note: The following research paper published in April 2020, entitled "Effect of Handler Knowledge of the Detection Task on Canine Search Behavior and Performance," concluded that "both sport and professional-handler dog teams had statistically similar accuracy rate under single and double-blind conditions."</p> <p>Accordingly, a nationally accredited assessor/certifying official shall conduct the odor recognition and operational assessments/certifications using a modified double-blind or single-blind evaluation. The courts have accepted modified-double blind, and this standard's obsession with double-blind is inconsistent with scientific research.</p> <p>With Modified Double-Blind method: The certifying official/assessor is positioned in a situation where he can see and communicate with the team, but neither the handler nor the canine can see the Evaluator. The exercise is then conducted like any other certification exercise; The certifying official/assessor remains concealed until the exercise is completed; The certifying official/assessor can observe ongoing environmental conditions to assess where the canine should give its trained final response based on the current environmental conditions and confirm the canine did give its trained final response (this is vital to interrupt environmental conditions that can cause the odor plume to significantly shift or chimney, causing voids in the odor plume during the certification or assessment...etc.). The certifying official/assessor can observe the canine acquire the odor signature and trace the odor plume to the substance, which also assures the integrity of the operational assessment (i.e., the canine has located the</p>		<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>The definition of a double-blind assessment has been updated. There is no modified double-blind assessment.</p>
69	5.8.2.2, 5.8.2.4, 5.8.2.5, 5.8.2.6, 6.2, 6.3	Please revise the discussion incorporating modified double-blind assessments and delete references to double-blind.		<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>The definition of a double-blind assessment has been updated. There is no modified double-blind assessment.</p>
98	6.1	This specifies that the handler must certify with each dog. Please also specify that if a dog is used by multiple handlers, each of those teams must certify separately.	It is not common for a canine to have multiple handlers, but it does happen, so this standard should outline the certification in that instance.	<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>As written, if a canine has multiple handlers they still need to certify individually.</p>
99	6.2	Remove "double blind assessments" - double blind can be done as part of maintenance training but should not be a "shall" mandate	Remove "double blind assessments"	<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>The definition of a double-blind assessment has been updated. The ASB CB has determined that double-blind assessments have merit and are essential.</p>

100	6.3	Organizations need to have the choice for in house vs. outside evaluation. Larger organizations (LE specifically) do lots of in house eval for firearms, defensive tactics, lots of other training. This should not be a SHALL requirement. Throughout this document is an underlying inference that operational teams are purposely skirting quality and honesty in their testing. Encumbering the industry with 170 shall requirements is doing a disservice to the industry as a whole and those who are irresponsible, will remain so.	Get rid of the shall re outside certifying officials	This section was not a redline portion of the document, therefore it was not open for comment. There is no prohibition for the certifying official to be in the same organization the teams being certified as long as they are not involved in training the teams they are certifying.
102	6.5	As written, the definition of a training aid does allow for it to be used in a certification (Section 3.68 "Training odor sources used for training.")	Please adjust language accordingly.	Accept with modification. The definition of training aid has been modified to "Target odor sources used for training, assessments, certification, maintenance training, and proficiency testing."
103	6.5	Set more realistic odor quantities	increase quantities	Reject. The amounts in this section are minimums, greater quantities may be used.
101	Table 1	Get rid of ORT	Replace with reality based line up	Reject. The consensus body has voted to maintain ORT in this section of the document.
104	Table 2	See note 5	Please note whether or not hair and finger/toe nails are considered human decomposition	Accept. Note revised to: "Human sweat, saliva, vomit, urine, feces, and semen , finger/toe nail trimmings, and hair trimmings are not considered human decomposition fluid as they are produced outside of the decay process."
70	6.5.1.1	Revise the definition: The ASB Staff believes Table 2 contains the training aids representing the complete spectrum of human decomposition.		Please note that the ASB Staff does not determine the content of ASB documents. ASB documents are produced using an ANSI accredited process of consensus by the ASB Consensus Bodies. Reject. There is no proposed resolution offered for the revision.
71	6.5.1.2 Tables 1 and 2	Please add human remains to the respective headers so it is apparent to the user.		Accept with modification. "Human Remains" added to table 2, it is not necessary for table 1.
72	6.5.2 (a)	Revise the sentence to the following: Containers shall be as permeable as possible to maximize odor availability by exposing the surface area of the target substance while completely restricting the canine's access to the training aid.		Reject. Comment is addressed in 6.5.2 b).
105	6.5.2a	See note 13	Please clarify or remove references to training	Accept with modification. The definition of training aid has been modified to "Target odor sources used for training, assessments, certification, maintenance training, and proficiency testing."

73	6.5.4	This requirement was discussed with a senior human remains master trainer associated with Customs and Border Protection. The discussion occurred during an ASB meeting immediately before this proposed standard was released.	<p>The ASB Staff's inability to listen to the aforementioned industry expert, coupled with their rejecting approximately 65% of the comments that were previously submitted on the last draft of this proposed standard, is unacceptable. This proposed standard will NEVER be a consensus-based document when the staff repeatedly refuses feedback from practitioners in the field.</p> <p>Delete this requirement from the proposed standard.</p>	<p>Please note that the ASB Staff does not determine the content of ASB documents. ASB documents are produced using an ANSI accredited process of consensus by the ASB Consensus Bodies.</p> <p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>This section is a recommendation and best practice, not a requirement.</p>
74	6.6	Replace the existing wording with the following:	At least one certification should be conducted using a modified double-blind assessment.	<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>The definition of a double-blind assessment has been updated. There is no modified double-blind assessment.</p>
75	6.7 (c)	<p>When a target substance with a high vapor pressure is elevated, the odor can travel substantial distances from its source. Some factors influencing the dispersion of the odor plume would include, but are not limited to, the following examples:</p> <ul style="list-style-type: none"> The amount of the exposed surface area; Whether direct sunlight is hitting the training aid; The wind speed and changes in wind direction; The composition of the training aid; The topographical features near the training aid; The time of day with down/up-drafts in air currents; The amount of vertical surfaces downwind of the elevated substance and The time since the substance was placed in the area...etc. 	Please revise the "regardless of the height" of the source.	Accept with modification. "regardless of the height of the source" has been deleted.
106	6.6	Get rid of Double Blind requirement	change to only "Certification components shall be single-blind."	<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>The definition of a double-blind assessment has been updated. The ASB CB has determined that double-blind assessments have merit and are essential.</p>
107	6.7	A short dog will necessarily alert to a hide 6ft off the ground more than 3ft away from the odor source.	Please clarify this point in terms of high hides.	<p>This section was not a redline portion of the document, therefore it was not open for comment.</p> <p>Paragraph revised based on comment 75. The certifying official has discretion for distance from the training aid.</p>

108	6.7a	Change ORT to reality based lineup	lineup	This section was not a redline portion of the document, therefore it was not open for comment. The consensus body has voted to maintain ORT in this section of the document.
109	6.7 c	Cannot require that a dog find a 6' high hide within 3 feet. Completely depends on the environmental conditions/odor flow whther interior or exterior	removed "regardless of the height." "acceptable proximity of a dog's indication to an elevated hide is left to the descretion of the certifying official."	Accept with modification. "regardless of the height of the source" has been deleted.
110	6.8 b	add:	Allowing canine outside of the search area unless the canine is actively following target odor into the assigned search area and/or if the handler determines the dog must search outside of the area to acquire target odor based on current conditions."	Reject. Section 6.8 is option, not a requirement or recommendation.
76	6.8	There should be an off-leash obedience certification/assessment, and failure of that element should constitute a failure.		Reject. The consensus body does not require an obedience at this time, however there is no prohibition for going above and beyond this standard.
77	6.8(b)	To clear the boundary of any area, you should get the canine outside the boundary. Otherwise, an elevated substance on the boundary will go undetected if the wind blows the odor outside the area.	Please reword the sentence.	Reject. Section 6.8 is option, not a requirement or recommendation.
111	7.5	The period for proficiency testing/canine team assessments is undefined and therefore can be exploited and unnecessarily burdensome to the smaller teams that don't have access to regular oversight training. This should not be a shall.	get rid of the SHALL and make periodic assessments a recommendation	This section was not a redline portion of the document, therefore it was not open for comment. The ASB CB has determined that assessments have merit, are essential, and are not always a formal testing event.
112	8.2.3	Table 1 does not give "guidance on how various training aids should be stored and handled." I believe this refers to Table 2 after 9.5r	Please correct this with the proper reference.	Accept.
113	9.2	Make the Assessments optional but recorded in logs if completed	"Training records which may include proficiency assessments may be documented combined or separated."	This section was not a redline portion of the document, therefore it was not open for comment. The ASB CB has determined that assessments have merit, are essential, and are not always a formal testing event.
114	Table 2 after 9.5r	This is the second Table 2	Please correct to Table 3	Accept.
115	Table 2 after 9.5r	It is not recommended that blood be taken from the handler for training. Please include all assessment types (like certification), not just training.	All assessment types should be included in the recommendation.	Reject. Any type of training aid is appropriate for any type of assessments outside of certification.
116	Table 2 after 9.5r	It is not recommended that blood be taken from the handler for training. I recommend making a similar note for human tissue and bone (for example, from an aputation of a handler's limb).	Consider a recommendation against using a handler's human tissue and bone in assessments.	Reject. If the commenter can provide a citation that proves that tissue and bone are scent specific, the CB would review and consider a revision.
117	Table 2 after 9.5r	Soil - A recommendation should be included for how far away the non-target odor soils should be collected from the target odor soils.	Consider using the same distance as when multiple targets are in a single search area.	Reject. There are too many variables to predict a minimum distance for every possible soil type and every environment scenario. The information in the last column is provided to ensure that no target odors are overlapping.

118	Table 2 Blood, All stages, Notes	Forbes and Reference(s) are missing	properly cite references	Accept.
119	9.6o	As written, the definition of a training aid does allow for it to be used in a certification (Section 3.68 "Training odor sources used for training.")	Please adjust language accordingly.	Accept with modification. The definition of training aid has been modified to "Target odor sources used for training, assessments, certification, maintenance training, and proficiency testing."
120	Table A.1	IF any comments are accepted, then updated as such		Accept.
121	Table A.1	Odor recognition assessments are described in 5.8, which falls under 5.6 and does not specify an amount >5g. Please align the language.	Please adjust language accordingly.	Accept.
122	Table A.1	Currently states "1 acre (4,046 m ²)..." Please correct to 4,047 m ² .	Please correct to 4,047 m ² .	Accept.
123	Annex B	add AUTHOR=DeChant Mallory T. , Ford Cameron , Hall Nathaniel J. TITLE=Effect of Handler Knowledge of the Detection Task on Canine Search Behavior and Performance JOURNAL=Frontiers in Veterinary Science VOLUME=7 YEAR=2020	add this reference wrt double vs single blind	Accept.
124	Annex B	Add: Case Study: An Evaluation of Detection Dog Generalization to a Large Quantity of an Unknown Explosive in the Field by Edgar O. Aviles-Rosa 1ORCID,Gordon McGuinness 2 andNathaniel J. Hall 1,	add this citation re quantities being realistic	Accept.
125	Bibliography	Consider removing references that are not peer-reviewed journals or government documents (such as the websites)	The references should be peer-reviewed or government provided to make them as reliable as possible when used in a standard	Reject. The goal of the bibliography is to provide examples of publications addressed in the standard.
126		Having the recirculation of ASB Standard 076 without resolving more of the last set of recommendations shows that the Consensus Body does not care about the thoughts and recommendations of the individuals that took the time to submit changes. If the working group completes the changes, then the Consensus Body needs to review all of the recommendations and discuss more as a body. I believe it is our duty to dig deeper into the reasons of these recommendations. I believe the Consensus Body should reach out to more Bonafide Organizations and discuss these standards with them to see if the certifying authority and certifying official can complete these high standards. If we don't get more balanced within the Consensus Body, the Courts will mandate something that is impossible to implement in the country. As member, I respect everyone's experience and knowledge, but we are making changes to an industry that will affect all K9 teams across this country.		Accept with modification. The consensus body will be provided all of the changes recommended by the working group. Every comment is read, discussed, and addressed. The consensus body is balanced in accordance to the ANSI requirements. The document is following the ANSI accredited process for the disposition of comments.
127		This standard is too expansive and restrictive for the majority of Human Remains detection handlers to comply with. A vast majority of Human Remains detection Handlers are civilian volunteers, working in small groups, that do not have the financial and logistical resources to comply with this standard. It should be emphasized in the crafting of these standards to make them obtainable to the constituency of the practitioners of the said training discipline. To impose such expansive and unobtainable standards only serves to provide detractors of canine work with ammunition to attack good canine teams and does a disservice to the law enforcement industry as a whole. Therefore, as the representative of one of the largest canine programs in the country (U.S. Border Patrol) with a large contingent of Human Remains Detection Handler and Instructors and the representative of a major national canine organization (North American Police Work Dog Association) I respectively vote "NO" to this standard.		There is no resolution provided, though, please note that the consensus body will be provided all of the changes recommended by the working group. Every comment is read, discussed, and addressed. The consensus body is balanced in accordance to the ANSI requirements. The document is following the ANSI accredited process for the disposition of comments.

128		<p>This standard as written does not adequately reflect the needs of the agencies utilizing human remains detection dogs and the appropriate skill set required to accomplish that mission. There are still unresolved errors in terminology. There are errors in the Table A.2 which consist of only 1 orthogonal detector, whereas the majority of the detectors listed are shallow surface geophysical instruments. This document is not ready to move forward at this time.</p>	<p>Accept with modification. The consensus body will be provided all of the changes recommended by the working group.</p> <p>Based on the comments received, many of these items have been addressed in this round of comment resolutions. Every comment is read, discussed, and addressed. The consensus body is balanced in accordance to the ANSI requirements. The document is following the ANSI accredited process for the disposition of comments.</p>
129		<p>Although I agree to recirculating 076 for additional comment, I do not agree with the document as a whole for the following reasons: <1. I do not think we are listening to the people in the field who are doing the work - the consensus must not just be the people in the room - it must reflect what actual practitioners are telling us. Also worth noting, that those providing public comments are the most conscientious in the industry...it is a laborious task to comment and they took the time, were thoughtful, and are coming from a position of field experience.</p> <p>2. Most comments were rejected by the 076 WG and those that were accepted were more clarification than substantive. To reject a comment and say "ASB standards are voluntary consensus standards" is really not accurate. Handlers will be the people in the witness box (possibly even facing professional liability for non compliance to the standard) having to defend against any one of the 170 Shall requirements that may have been missed or not adequately documented in logs.</p> <p>3. As written, this standard again does not reflect the mission. It is another case of forcing handlers to train for tests or assessments rather than training for real world operational success. Of course there is overlap in having good foundational skills, but we need to listen to what people in the field are telling us. We do not work in a laboratory setting.</p> <p>4. As written, this standard will all but disqualify in court the vast majority (if not all) operational HR teams - not because they are not doing good work, but because they are not meeting artificial and overly prescriptive tests and assessments.
</p> <p>5. To my knowledge, none of the existing recognized standards (NNDDA, NAPWDA, NPCA, IPWDA, NASAR, NSDA, POST, etc) comply with all of the 076 specified requirements (170 "shall" requirements.) I will be submitting excel comment sheet with specific responses line by line but this is the basis of my rejection of the document.</p>	<p>Accept with modification. The consensus body will be provided all of the changes recommended by the working group.</p> <p>Based on the comments received, many of these items have been addressed in this round of comment resolutions. Every comment is read, discussed, and addressed. The consensus body is balanced in accordance to the ANSI requirements. The document is following the ANSI accredited process for the disposition of comments.</p>