

Deadline of  
Submission of 14-Oct-24

Comments:  
Document  
Number: ANSI/ASB Std 173

Document Title: Standard for Education, Training, Continuing Education, and Certification of Forensic Toxicology Laboratory Personnel

Comment #	Text Line # (s)	Document Section	Type of Comment	Current Document Wording	Proposed Revision	Final Resolution
			E-Editorial T-Technical			
1	4	1	T	What about individuals that are method development/validation or quality personnel that don't fit into any of the categories listed in this paragraph?	Either add this type of personnel to the "outside of scope" or include language to where their expertise can apply.	REJECT: Individuals who only perform method development or validation work may or may not be exempt from this document. It depends on the range of duties described in their position description compared to those duties defined in this document (e.g., technician, analyst, toxicologist). Quality personnel are already exempt based on the statement: "The following are outside the scope of this document: personnel who exclusively perform administrative or non-technical duties."
2	60	3.10	E	The definition of "opinion" is a "View, judgment or belief that considers other information besides observations, calculations, and interpretations." This is confusing to us and seems more appropriate as a definition of "decision" or "conclusion".	Replace this definition with something like "A view, judgment, belief or interpretation based on observations, calculations and/or other information evaluated in the light of prior training and knowledge.", which would be a better definition of "opinion".	REJECT: The definition is a slight modification of the OSAC preferred terms. The Consensus Body supports that use of the definitions as listed by the OSAC.
3	71	3.13	E	The definition of "technician" is "individual, however named, who performs basic analytical duties but does not evaluate and interpret observations and calculations. Technicians may also perform instrumentation verification, adjustment, and calibration duties. They may be named in reports to indicate their contribution to the work." However, while it is not the technician's job to reach conclusions that are relevant to the legal implications of evidence, technicians nevertheless can and should interpret data, make observations, and perform calculations, which are tasks that this definition denies them. For example, if a result seems wrong or does not align with certain calculations, it may be a sign for a technician to check instrumentation or re-do a procedure. Technicians are not mere automatons and it is advantageous that they are not in such circumstances.	Revise the definition to fully encompass the role of a technician is forensic technicians in forensic toxicology.	REJECT: The commenter's example includes responsibilities that meet the definition of an analyst. A laboratory may choose to call the position a "technician", but the requirements for an analyst set forth in this document would need to be met.
4	85	3	E	3.16 and 3.17 are not in correct alphabetical order	reorder	ACCEPT: The terms were reordered for proper alphabetization.
5	102	4.1.1.2	T	Oddly specific date listed.	Remove	REJECT: The deadline provides laboratories a chance to comply with requirements that may take years to fully meet. This is particularly true for some of the educational requirements.
6	107	4.1.2	T	Can on the job training substitute for an associates degree?	<i>Accept on the job training as a substitute for an associates degree</i>	REJECT: This would essentially remove any educational requirement for the Technician position. The Consensus Body does not support on the job training as a substitution for an Associate's degree.
7	115/122	4.1.4 and 4.1.5	T	It appears that experience in a position would not count towards the college-level courses. (In terms of internal promotion).	account for years of experience and on the job training as a substitute for college-level courses	REJECT: The Toxicologist and Technical Leader are required to have a Bachelor's degree and additional formal training, as defined in the document. Experience, while relevant, does not substitute for formal education.
8	122	4.1.5	T	Would managers (Not Chief/Director/Deputy Chief level) be included in the Technical leader category or a regular toxicologist?	clarification in either definitions or educational qualification area.	REJECT: The proper category for managers will depend on their technical duties, as defined in Section 3.
9	133	4.2.1.1	T	What is the intention of the term 'each' in the first sentence? Is this referring to a singular assigned duty or collective ?	Change 'each' to 'an'. <i>The laboratory shall ensure technical personnel are trained and demonstrate competency in an assigned duty before being authorized for independent work.</i>	REJECT: The suggested change was not made; however, the sentence was modified to clarify that training and competency must occur in each assigned technical duty before the individual is authorized to work independently in that duty.

10	144	4.2.2.3	E	The first sentence is a larger font than the remainder of the section.	Change font size of the first sentence	ACCEPT: Font size was reduced.
11	144	4.2.2.3	E	first sentence is a different font size	correct font size	ACCEPT: Font size was reduced.
12	144	4.2.2.2	E	Font size differs for "Training sources..."	Fix font size so it is consistent throughout.	ACCEPT: Font size was reduced.
13	169	4.2.4	T	Can education count towards years of experience? For example, an individual is hired as a Technical Lead/ Supervisor upon competition of a PhD	Have education count towards years of experience	REJECT: The Technical Leader Position requires a solid education coupled with the minimum experience defined within the document.
14	169	4.2.4	T	Seems to contradict the minimum educational requirements for technical leader since experience is also mandated, not just education.	apply substitutions of experience to the college-level courses and vice versa for experience if Master's or Ph.D. is obtained rather than a Bachelor's. Also reference 4.2.4 in 4.1.5 for the experience component.	REJECT: The Technical Leader Position requires a solid education coupled with the minimum experience defined within the document. A note was added to Section 4.1.5 to point out the additional requirement of experience in Section 4.2.4.
15	201	4.3.3.2	T	How does presenting at a conference or a workshop receive different CE units? A presentation for either could be differing lengths dependent upon the presenters role.	Make presenting at either a conference or workshop worth the same amount of CE units	REJECT: Workshop presentations vary in knowledge gained in preparing the presentation. As such, the recommendation of 1 CE unit per contact hour is supported by the Consensus Body. However, it is important to note that Section 4.3.3.1 allows laboratories to define the CE units assigned for each activity.
16	206	4.3.3.2	T	How is a contact hour determined for mentoring? Is this just specific meetings with the mentee? Mentoring can look a variety of ways and contact hours can be difficult to determine	Make mentoring worth a set CE unit per year, similar to publishing an article	ACCEPT: A maximum of 5 CE units per year for mentoring was incorporated.
17	216	4.3.3.2 NOTE	E	I believe the intent of this edit was to point out that CE units for certification bodies may differ, but that does not impact this standard. The current wording could be misinterpreted to think that you can use the certification body's CE unit system to meet this standard.	NOTE: Certification bodies may use a different scoring mechanism for CE units for their programs, but that does not alter the CE unit requirements in this standard.	REJECT: The CE units listed for each activity are recommended, but not required. Section 4.3.3.1 clarifies that laboratories define the CE units for each activity. The note is to recognize that some certification bodies may assign different CE units for maintaining certification than what is recommended in this document.
18	226	4.3.4.2 (Note)	T	I don't think that "amount of time spent on a training activity" is really an assessment method as it does not measure what a trainee has learned (if anything). It is useful information to record but will vary widely between individuals.	Remove reference to "amount of time spent on a training activity".	REJECT: The note provides guidance but is not a requirement. For some activities, the time spent may be very important in assessing the number of CE Units awarded to an activity. For example, the time spent serving as a mentor. It is important to note that a laboratory may choose to not consider the time element in their assessment of a training activity.
19	234	4.4.2	E	The sentence has 'three' and '3' for years	Remove '3'	REJECT: Parenthesis were intended to bracket the number 3. The parenthesis were added.
20	237	4.4.3	T	What certification programs are intended here? A primary certification relevant to forensic toxicology is ABFT, however, it currently does not appear ABFT is accredited under ISO-IEC 17024.	Provide examples of acceptable certification programs	REJECT: ABFT is accredited under ISO/IEC 17024. Examples will not be provided, as doing so may suggest endorsement of the listed examples.
21	247	4.4.3	T	Many people do not test well but do better on practicals.	add the option to do a practical exam and not only do a written exam if it does become available.	REJECT: The written examination is a requirement of 17024 accreditation.
22	249	4.4.3	T	Some certification programs wait decades before reviewing their available exams which isn't realistic in the ever-changing field of forensic toxicology.	add the requirement that the certification program updates their exams in a more frequent timeframe.	REJECT: The suggestion is outside the scope of this document. The requirement to be accredited to 17024 should address the commentor's concerns.
23	256/266	5.2 and 5.3	T	What if an employee needs to be re-authorized in a laboratory activity? Where are the suggested minimum procedures for this?	create re-authorization procedures if one demonstrates a lack of competency	REJECT: Section 5.3.2 states that the laboratory must address remediation when the expected outcome is not achieved (e.g, lack of competency).
24	262	5.2.2	E	The second bullet refers to 4.2.2.1.4, but this does not exist	Refer to 4.2.2.4	ACCEPT: Correction was made.
25	315	Annex A	T	Add Smith v Arizona as an example for confrontation under Legal Aspects		ACCEPT: Added Smith vs Arizona
26	315	Annex A	E	ANSI/ASB standards are cited as examples throughout the Annex, recommend updating for standards that have been published since this draft started	Add BPR 122 Alcohol Calcs to Alcohol Toxicology and Std 056 UoM to Statistical Analysis	ACCEPT: Added both documents to the Annex.