

I wanted to start by saying thank you to the Commission for allowing those of us who could not travel to DC for this meeting to offer comments. My name is Jody Wolf and I am the President for ASCLD. ASCLD is a member of the Consortium of Forensic Science Organizations which represents 21,000 professionals in the forensic community. My comments are related to the presentation yesterday regarding the OSAC approved standard E2329-14 on Seized Drug Analysis.

First, I'd like to thank NIST for the tremendous effort expended on standing up the Organization of Scientific Area Committees. This has been a monumental achievement and has brought together more than 600 experts from forensic science, academia, and legal communities. These experts overwhelmingly are trained as scientists with the majority of OSAC members having a minimum of a Bachelor of Science degree and many with advanced degrees. On the FSSB alone there are 10 out of the 17 members with PhDs or MDs and the FSSB is the final gatekeeper of approving standards for placement on the federal registry. This body of recognized experts has put into place a series of policies and practices that are in line with the internationally recognized best practices for standards developments through consensus building, harmonization, and balance of interests. In my experience, I have not witnessed another technical industry so quickly and effectively build and put into action a body that will set the foundation for the best practices within that industry. I want to make sure that we all recognize the monumental achievement of NIST in standing up such an organization.

Secondly, I would like to commend NIST for their efforts to make the OSAC process for considering and approving standards deliberate and transparent. I was able to review on the OSAC-Kavi website yesterday the public comments offered in reference to Standard 2329-14 and the Seized drug subcommittee's responses. It is an excellent example that provides a clear and transparent understanding of the issues considered by both the commenters and the subcommittee. I think it is an example that this body can certainly emulate as it continues to consider comments offered by the public.

Finally, I'd like to express my appreciation on behalf of all of our members to the Seized-drug subcommittee, the SAC Chairs, and the FSSB for remaining committed to the policies and practices established to consider standards and guidelines for forensic science for placement on the national registries. This is a difficult process and these professionals are setting precedents for the manner in which our industry will operate in the future. While there was much criticism on standard 2329-14 yesterday, I would ask that those who are critical of it to not minimize the importance of this standard by focusing on simply one word out of the more than 1,000 that are included in that standard. The standard sets forth the acceptable analytical approach for chemical identification of substances and has been recommended for revision to address offered criticisms of the word uncertainty.

I am fortunate in that before I joined the forensic industry, I worked as a chemist in the environmental and pharmaceutical industries. I can tell you from my own experiences in these technically related industries that the methods described in Standard 2329-14 are the same approaches we use regardless of industry for the identification of chemical compounds. These are the methods that are taught in undergraduate analytical chemistry classes for this purpose and they were recognized in the 2009 NAS report as mature and sound science. There will always be opportunities to improve our practices and I encourage the members of this body to support the effort for continuous improvement.

Thank you!