



American Academy of Forensic Sciences
American Society of Crime Laboratory Directors
International Association for Identification
National Association of Medical Examiners
Society of Forensic Toxicologists/ American Board of Forensic Toxicology

March 14, 2022

The Honorable Merrick Garland
Attorney General of the United States
US Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Dear General Garland,

We are writing to express concern with a provision in the BJA Coverdell Grant Solicitation. The Consortium of Forensic Science Organizations represents about 21,000 forensic practitioners across the United States, many of whom work in local police departments. While it is estimated there are some 3,000 local police forensic science units, the exact number is unknown. It is well documented these small forensic science service providers are in need additional resources to meet the ever increasing caseload, while maintaining quality objectives. Moreover, most small police forensic science units are currently not accredited by an organization recognized under international standards as are most all the larger, publicly funded forensic science service providers. Many of these small forensic science units aspire to achieve accreditation, but due to the lack of resources find it presently difficult to accomplish.

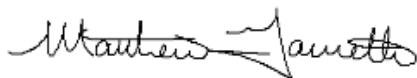
The Bureau of Justice Assistance (BJA) FY 21 Paul Coverdell Forensic Science Improvement Grants Program solicitation (<https://bja.ojp.gov/sites/g/files/xyckuh186/files/media/document/O-BJA-2021-109004.pdf>) has requirements in the solicitation that do not appear in the authorizing legislation (34 U.S.C. § 10561 *et seq.*). Of particular concern to CFSO is the solicitation requirement, added in 2019, that for an entity to be designated as “a forensic science laboratory” they must have at least one forensic scientist with “a minimum of a bachelor’s degree in a natural or formal science.” That aspirational requirement does not presently reflect reality in local police department forensic science units, and prevents some local police department forensic units from receiving Coverdell funds that would assist them in becoming accredited and instituting a quality management system that improves the validity, reliability, and reproducibility of its forensic testing. We understand the need of BJA to define a forensic science service provider for purposes of the solicitation. Our preference would be for the solicitation to define an eligible forensic science service provider as *a state, county, or unit of local government agency having not fewer than 1 full-time analyst, who examines physical evidence in criminal or investigative matters and provides reports or opinion testimony with respect to such evidence in courts of law in the United States.* CFSO would also request that this requirement be regularly reviewed as the forensic science community moves forward with the adoption of educational standards in each forensic science discipline.

The criminal justice system in the United States must address the needs of small local police department forensic science units. In some jurisdictions, these units examine a majority of the physical evidence submitted for examination and presentation in court. It has been the intent of Congress that the Paul Coverdell Forensic Science Improvement Grants provide support for all publicly funded forensic science service providers, including the numerous local police forensic science units. Local police forensic science units comprise the majority of unaccredited laboratories remaining in the United States that need funding for accreditation purposes along with other forensic science-related funding.

The CFSO would like to take this opportunity to thank and extol the efforts of BJA (and NIJ) through the years in recognizing and attempting to address the continuing and ever-changing needs of the forensic science community. Each of our member organizations is truly grateful and confident that BJA will continue its enthusiastic efforts as we move forward and advance. The CFSO is also appreciative of the many opportunities presented by BJA to collaborate in areas of interest to our community.

Therefore, we respectfully request you review the imminent FY 22 Coverdell solicitation with BJA prior to its release and consider our proposed wording. This proposed wording would allow for the numerous local police forensic science units that are not presently eligible for Coverdell to access the much needed Coverdell funds in pursuit of accreditation as well as providing them access to funding to address the many other pressing forensic science related issues necessary to assist the criminal justice system in fulfilling its mission. This simple modification would continue to ensure confidence in the quality and reliability of forensic science results provided to our criminal justice system and the stakeholders we serve. We appreciate any consideration and assistance you may afford the forensic science community in this all-important issue.

Respectfully,



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CFSO Chair



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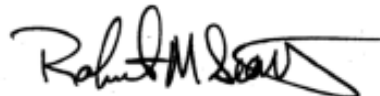
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