



April 11, 2017

Dear National Commission on Forensic Science Members,

The International Association of Identification (IAI) represents over 7,000 members that are primarily active practitioners in the pattern evidence and crime scene disciplines. Our Organization promotes standardization and excellence throughout the forensic science profession. We encourage any collective effort whose endeavors work towards that end. Therefore, the establishment of the Commission and the manner in which it has moved forward has always been and continues to be of extremely high interest and importance to the members of the IAI.

On behalf of the IAI membership, I would like to take this opportunity to thank the commission for all its hard work fostering an agenda promoting the advancement as well as research in forensic science. Since your first meeting in February 2014, we have looked toward the commission and to its work products in supporting and promoting positions that we have maintained dating back to our presentation on December 6, 2007 to the National Academies of Sciences - Committee on Identifying the Needs of the Forensic Science Community. While we have not agreed with all of your recommendations we have appreciated your efforts and the process, which allowed for comment and feedback from the community.

Before I discuss our vision looking forward, however, I would like to touch on some of the commission's recommendations which we support. Concerning Universal Accreditation, the IAI fully supports the commission's recommendation on accreditation of all forensic service providers. This not only includes all crime laboratories but based on a study undertaken by the IAI several years ago some 3,000 identification units across the country. We also support the five-year window, which has been proposed to achieve this feat. While this is a goal that we aspire to we believe it is important now to map out an implementation plan to achieve this goal in the 5 years that you have recommended. Regarding certification, the IAI strongly supports the commission's recommendation that all forensic science practitioners "become certified in all categories of testing in which examinations are performed as soon as the requirements of the certification body are met, provided a certification examination is available." As you pointed out in part further in your recommendation, "(professional certification) provides the general public and the judicial system with a means of identifying those practitioners who have successfully demonstrated compliance with established requirements." As a certifying body of forensic practitioners, we recognized the importance of certification several years ago and developed continuing programs which continue and is recognized by the forensic community along with many of the stakeholders we serve as a benchmark to be followed

by others. I would like to take the time to again thank the commission for inviting the IAI to come before the commission to describe our program and extol its benefits to the stakeholder community.

Regarding proficiency testing, the IAI supports the commission's recommendation encouraging all forensic service providers to be proficiency tested in their respective disciplines.

If there is one commission recommendation where the IAI is particularly grateful for and supportive of is the recommendation on AFIS interoperability. This long-standing problem facing the latent fingerprint community dates back many years. To get a sense of just how long the problem has persisted I go back to years just prior 1995 when it was professed interoperability would occur by 1995. Here I am before you today in 2017 and we have not yet seen a fix to this all important problem. We believe the continued attention brought to this issue may one day lead to its resolution.

Looking ahead with the sun setting of the commission looming on the horizon, the IAI in furtherance of the commissions' efforts supports the formation of the Office of Forensic Science (OFS). We believe this office should reside in the Department of Justice and work alongside the OSAC housed at NIST. As stated by the Chair of the Consortium of Forensic Science Organizations and Dr. Victor Weedn during a House Judiciary Committee hearing on March 28, 2017 "the voice of the forensic science community is not commensurate with the new role and accordingly forensic science has been relatively neglected and inadequately supported". Your commission has echoed those sentiments and provided a roadmap for the path forward. Now it is time to develop an implementation plan. We believe that forensic practitioners should be represented in appropriate numbers on all levels of the committees and administration in the proposed OFS. We also suggest that the pattern evidence and crime scene disciplines are included in significant proportions. In conjunction with the establishment of the OFS, we support the codification of the OSAC insuring not only their existence but continued appropriations commensurate with their work. We recommend the National Institute of Standards and Technology (NIST) continue to remain the overarching authority coordinating and facilitating the OSAC's administration, meetings, and work products. Many of our IAI membership serve in various capacities on the OSAC's and the IAI is extremely happy with and supports the OSAC's efforts. It is critical, in our opinion, that appropriate offices be set up and qualified leadership with forensic backgrounds be put in place.

We strongly support the creation of this office to do the following:

- 1) Review the recommendations from your Commission and create a strategic plan to advance the operation of our nations crime labs by implementing the appropriate recommendations.
  - a. Create a robust research agenda going forward between practitioners and academia. As you are all aware, science is ever changing and therefore forensics as well. The IAI supports research being done at numerous

agencies to include applied research as it directly relates to contemporary questions and issues put forth by the criminal justice system as well as basic research as it is conducted at many of our colleges and universities. The IAI also supports collaborative efforts amongst academia, forensic service providers, and forensic practitioners. The IAI supports and promotes the establishment of a federal repository of all forensic literature and research both past and present catalogued, which would be made available to interested parties. Currently there is nothing in existence and would be beneficial not only to practitioners but researchers as well. An OFS would be able to coordinate and lead this effort despite numerous agencies participating in research endeavors.

- 2) Map out an appropriate strategic plan for sufficient resources that will not only assist in current operational issues but works to get in front of emerging problems such as the opioid issues. Acquiring and maintaining proper instrumentation, training, accreditation, certification, and proper funding to implement any program, all comes back to sufficiently and consistently appropriating the resources to achieve not only the needs of the forensic communities but those being demanded by the stakeholders we serve including the judicial system. Without adequate funding and the continued commitment of those resources to achieve the recommendations, what good are they. If anything, these might as well be considered unfunded mandates. Instead of furthering the forensic community and its role in the criminal justice system, it will become the albatross around our necks as we are questioned by the judicial system as to why haven't these recommendations been put in place. The lack of implementation due to the lack of funding can also be viewed by our stakeholders as a failure on the part of the laboratory calling into question the reliability of its work.

In closing, the IAI recognizes and thanks you for your commitment over the past three years in recognizing that although we believe the sciences are sound and the resulting opinions valid, in science there is always work to be done and new frontiers to explore. We are grateful that you have brought not only attention to the issues facing the forensic community but your willingness to reach out in inviting us to assist you in your endeavor. The IAI stands by to be a resource to you, and we look forward to any opportunity we have to address the commission either through invited participation or through public comment. Please do not hesitate to call on us for assistance and participation as you move forward making recommendations for the future of the forensic community.

Sincerely,

A handwritten signature in black ink, appearing to read "Harold Ruslander", with a long horizontal line extending to the right.

Harold Ruslander  
President, International Association for Identification