

Deadline of Submission of Comments: 26-Jun-23

Document Number: ANSI/ASB Std 076

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

#	Section	Type of Comment (E-Editorial, T-Technical)	Comments	Proposed Resolution	Final Resolution
439	Whole document	E	Add intext citations	Add as appropriate throughout the document	Accept with modification. Many were added (see the numbers in superscript/brackets). If more are found during this round of comment resolution, they will be added.
354	General	T	Sometimes the document is written as if it is an actual test standard to be directly implemented by an evaluator...and sometimes it falls short of that. Be clear about what this document is.		Reject: This comment is too vague to address without specific examples.
355	General	T	Consider the legal ramifications if a team doesn't follow everything exactly as laid out in this document!		Reject: This document was revised in the first round to remove requirements that would cause legal ramifications. More specific examples would be needed from the commenter to make additional modifications.
350	General	T	I'm not sure what the difference is between an Operational Assessment and a Certification. It's possible that I'm not thoroughly reading the document. I do believe that a team should regularly perform proficiency assessments, and I like how this document calls that out. However, the term Operational Assessment, seems to imply that an internal Operational Assessment could substitute for an external Certification?		Accept with modification: Operational assessments are the individual components that make up a certification. Note added to "certification" definition for clarification. Also, Section 6.3 states that the certifying official shall not be consistently involved in the day-to-day training, requiring that certifications are done by someone outside the canine's team.
348	Overall	T	I'm struggling to envision how the proposed standards could be implemented within any of the current certifying entities. I'm not sure that any have the infrastructure or manpower to make the changes in existing certifications to meet these standards. Evaluators and testing events are often difficult to schedule, as most are volunteers that do it in their free time away from their paid jobs. LE certification tests (e.g., NAPWDA and IPWDA) are far and few between. While I agree with annual certifications, this standard is putting further burden on existing evaluators. In addition, the proposed standards suggest a longer, more difficult test to set-up and administer.		Reject: No actionable resolution provided. The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards.
406	Throughout	E	Typos and grammatical errors throughout the document.	There should be a careful review/proofread of the entire document.	Accept with modification: As additional modifications are made to the document, the ASB Staff and Working Group will be doing additional clean-up on the document.
407	Throughout	E	There is a lack of consistency in language used. For instance, sometimes "evaluator" is used, other times "assessor".	The subcommittee should pick a single term and use it consistently throughout the document.	Accept: Evaluator removed from the document.
447	shall	T	review where "shall" is placed throughout the document; may be appropriate in some areas but should be reviewed. This standard is for "best practices"; shall and should have very similar meanings; we should be careful not to set guidelines that can be interpreted as written rules; The difference in using shall and should in contracts and other legal documents can have a significant impact on whether someone is legally required to do something; these two words are often debated and I believe "shall" can mean "certain or mandatory", sometimes "shall" is being replaced with "must" in some federal documents; "should" means "suggests, recommends or advises"; it seems nuanced but since the document may have legal implications, someone with a legal background should weigh in on this.	should or suggest	Reject: The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards. Implementation is intended to be applied prospectively, and not retroactively.

444			<p>I vote No based on the following comments:</p> <ol style="list-style-type: none"> 1. This is a revised and edited version of Standard 076 and there will be many comments from the public that need to be reviewed and discussed by the Consensus Body as a whole. We should not vote yes on a revised version which needs to be discussed and corrected by the working group. 2. Scope: 1 The ASB Dogs and Sensors consensus body is made up of veterinarians, scientists, and practitioners regarding available relevant scientific understanding and practical experience. We need to remember that our recommendations will be interpreted by the judicial system as the standard; therefore, we should use different words to describe our intent. We should use recommendations instead of requirements. 3. As a Consensus Body we are working together to promote "best practice" not make it the standard that must be followed unconditionally. There are many organizations that have years of experience in evaluating and assessing canine teams in all disciplines. We need to research their by-laws and testing procedures before making our way the standard. This is very important because this standard and all the standards that are approved will be interpreted as the only acceptable way by lawyers and defense experts. Many court cases will be affected by the information the jury and judges receive and our standards will be documented in court. I am discussing the sections 5.8.1.1.2 and other assessment sections. These organizations are USPCA, NAPWDA, NNDA, etc. There should be more information gathered from the organizations that are recognized by the US Supreme Court as bona fide organization. These are the practitioners of the canine industry. 4. I will wait to see the comments and then vote with the second voting opportunity. 		<p>Reject: 1) ANSI recommends that the document be distributed to the public for comment and the consensus body for ballot and comment concurrently so all comments can be reviewed at the same time. 2) The ASB Dogs and Sensors consensus body and the ASB Board has voted to publish this document as a Standard, and not as a Best Practice Recommendation. The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards. Implementation is intended to be applied prospectively, and not retroactively. 3) Certification and assessment standards and documents of organizations were reviewed in the drafting of this standard. The proposed requirements are a conglomeration of the practitioners of the canine industry. 4) Per the ASB Procedures, this document will be recirculated based on the revisions made in this round.</p>
402	Final comments.	T	<p>170 SHALLs in this document. Unattainable and unreasonable for most organizations and/or HRD teams operating in this country.</p>	<p>So, if only one "shall" requirement is not followed, by definition, the handler/organization is in violation of this standard and will/can be deemed "unreliable"and/or unqualified by the courts (both criminal and civil) - certainly that will be the assessment and argument by the defense team and by the defense experts.This standard, as written, sets handlers/teams/organizations up for civil liability - civil cases against handlers (both LE and Civilian) is on the rise. Odor quantities/threshold are not functional, ORTS are not functional, and assessments are convoluted at best. This standard, as written, encourages a "train for test" rather than "train for mission" attitude. It is not designed for the volunteer community which is the vast majority and will likely remain the vast majority of HRD teams due to cost/benefit assessments by LE departments. Recommend writing a "Certification standard" (shalls) with training/protocol/assessment/records/training aid storage etc. guidelines (shoulds)</p>	<p>Reject: The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards. Implementation is intended to be applied prospectively, and not retroactively.</p>

327	Under 1. Scope	T	change "required" to "best practices". The forward makes it clear - this is not validated		Reject: The ASB Dogs and Sensors consensus body and the ASB Board has voted to publish this document as a Standard, and not as a Best Practice Recommendation. The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards. Implementation is intended to be applied prospectively, and not retroactively.
442	Foreward	T	I'm not sure how a document that hasn't been validated can be used as a standard?		Reject: The ASB Dogs and Sensors consensus body and the ASB Board has voted to publish this document as a Standard, and not as a Best Practice Recommendation. The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards. Implementation is intended to be applied prospectively, and not retroactively.
428	Forward	E	First paragraph, last sentence. I think this sentence would make more sense if it began with "This standard."	Add recommended text	Accept
403	Foreword - para 1	E	"...relieves the judicial system of conflicting protocols." - These standards are not mandatory, though, so this cannot be confirmation or enforced.	"...seeks to reduce the variability in protocols used by canine handlers who are involved in the judicial system."	Reject: The canine handlers are not "involved in the judicial system" the paragraph as it is written is appropriate.
404	Foreword - para 2	E	"Although validated training standards are the goal, in this document a consensus-based, best practice training document promotes repeatability and reproducibility while the necessary research develops." - The way this is phrased is a little odd. See recommended language to help with clarity. We also added in some points from later in the Foreword that are more relevant to this paragraph.	"Although validated training standards are the goal, this is a consensus-based, best practice training document that, when followed correctly, will increase standardization. Standardization is a form of quality control that seeks to increase consistency in canine detection results, independent from validation. The result of this will be increased repeatability and reproducibility within the discipline while the necessary research develops [1]. "	Accept: Paragraph modified as recommended
405	Foreword - para 3, 4, and 5	E	The Foreword is very repetitive. See suggested revised version that is much shorter that could replace paragraphs 3, 4, and 5 in the Foreword.	"Detection canine teams serve as an investigative tool. The results of detection can be used to establish "probable cause", develop leads that investigators can pursue, or to assist emergency professionals. A result from a canine detection team alone is insufficient as a basis for closing investigations or be used alone as a basis for charging someone. Confirmatory lab testing or further investigation that yields more evidence might occur because of the work done by a canine team, though."	Reject: The foreword was written with input from the OSAC Legal Resources and Human Factors task groups, and has been approved to be kept in the document by the ASB consensus body.
359	Forward	T	"The training programs described in this standard have not been validated because there are no validated training programs. Given the lack of validation studies in this area, the standard assembled expert opinions about best practices into a training document so that the training and accreditation of canine teams across this discipline of canine detection is standardized. Although validated training standards are the goal, in this document a consensus-based, best practice training document promotes repeatability and reproducibility while the necessary research develops."	After reading through this entire document, it IME/IMO does not reflect operational functionality and should therefore not be a standard. It, with modification, can be utilized as a best practices guideline and a means of assessing the reliability of a Canine team as a "witness" in court proceedings. Because blood and human decomposition is not in and of itself contraband (there are live humans who are decomposing - i.e. some homeless with injury that have evolved to decomp flesh with maggots is not uncommon in large metro areas), using an HRD dog's indication as a "scientific tool" to be held to the "standards" of a scientific tool/bio sensor is pushing a limit. Recommend changing throughout to GUIDELINE - including the removal and replacement of shalls to shoulds/recommends.	Reject: The ASB Dogs and Sensors consensus body and the ASB Board has voted to publish this document as a Standard, and not as a Best Practice Recommendation. The purpose of this document is to move the discipline forward in canine detection. Also, ASB standards are voluntary consensus standards. Implementation is intended to be applied prospectively, and not retroactively.

360	Forward	E	How much Corroborative evidence depends on the quality not quantity - suggesting "many pieces" is unnecessary and wordy. "Confirmatory analyses that serve this purpose require additional investigation, laboratory testing, and (ideally) many pieces of corroborating evidence." And stating how that corroborative evidence is obtained is outside the scope of this standard.	Change to: Confirmatory analyses that serve this purpose requires additional corroborating evidence.	Reject: Scientific and laboratory testing is an important part of any investigation.
361	Forward	T	The following statement is redundant to the statements above. PC is all that is needed "to charge someone" Therefore, this statement should be removed. Also should specify HRD K9 team.	Remove: "A result from an HRD canine detection team alone is insufficient as a basis for closing investigations or be used alone to establish probable cause."	Reject: An investigation is not closed solely based on the HRD canine detection. The consensus body feels that this is not repetitive within the Foreword and both are to be kept in.
362	Forward	T	"While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability [1]. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes. It is expected as the research continues that this standard will evolve and additional specific citations to research to support or alter specific aspects of the training standards are expected as a result of this standard. "	Again, promoting research in a Standard seems out of scope. Suggest that this document be converted to a guideline and leave the evolution and research future. Stay within scope. All of this justification is perception management - to convince people of its worth. Either it is or it isn't. By stating that this "standard" is unvalidated negates it as a standard and would therefore negate its worth in a court setting.	Reject: The foreword was written with input from the OSAC Legal Resources and Human Factors task groups, and has been approved to be kept in the document by the ASB consensus body.
8	Forward the first paragraph	T	The first sentence is conjecture and should be removed. This document will likely increase the burden on the judicial system due to the "all-things-considered" approach prescribed thought-out this proposed standard. The Supreme Court rejected a prescriptive "all-things-considered" mechanistic approach in Florida v. Harris. Section 4 of this proposed Standard, entitled "Canine Team Requirements," uses "shall" versus should, creating a prescriptive checklist of "all-things-considered," setting forth a mechanistic approach that must be done to train the canine handler and canine. Accordingly, the wording in section 4 should be modified to should from shall.		Reject: The first sentence in the Foreword is just intending to give background on the document. The Foreword does not contain any requirements or recommendations. As for converting all of the requirements to recommendations in section 4, this document was approved to be written as a standard with requirements. The WG and CB would also need specific occurrences of "shall" and why each would need to be modified. This request is too overarching and vague.
9	Forward the second sentence in the second paragraph	T	Change the second sentence to the following: Given the lack of validation studies in this area, the standard assembled selected professional opinions about what they believe are best practices into a training and certification document so that the training and accreditation of canine teams across this discipline of canine detection is standardized to a consensus of their opinions.		Reject with modification: "selected professional" added, the other recommendations are not necessary and implied in the sentence. The Foreword is strictly informational and does not constitute any requirements or recommendations of the document.
10	Forward the third sentence in the second paragraph	T	Forward the third sentence in the second paragraph - Change the third sentence to the following: Although validated training standards are the goal, this document is the ASB subcommittee's recommended best practices for training and certification. The ASB's subcommittee believes this standard will promote repeatability and reproducibility in training and certification while necessary research further develops.		Reject with modification: this sentence was revised based on a different comment. The sentence now reads: "Although validated training standards are the goal, this is a consensus-based training document that, when followed correctly, will increase standardization."

11	Forward the fourth paragraph	T	<p>The first sentence in the fourth paragraph implies that the concepts incorporated in the proposed standard training and testing will increase canine consistency and reliability. The study referenced in the footnote does not appear to address virtually any of the core issues proposed in this ASB Standard (e.g., prescription all-things-considered training for the canine and the canine handler, double-blind v. single-blind, failure to incorporate modified double-blind testing in lieu of double-blind testing, randomization of the number of target odors and their placement locations instead of placing focus on the discipline-specific qualifications of the certifying official/assessor to strategically placing the targets, arbitrary search times that fail to consider the environmental conditions that can change as the sniffs are conducted, the surface area of target odor within a search area - smaller target substances require narrow sweep-widths to detect the target substance, the amount of underbrush and vertical surfaces within the area, and the target odor decomposition spectrum used in the proposed certification, fails to specify the level of decomposition shall vary to cover the spectrum of the odor signature...etc.) and it should be clarified or deleted.</p>		<p>Reject: The training programs described in this standard have not been validated because there are no validated training programs. However the study cited does show how standardization of a canine program and clarification of requirements improves overall performance.</p>
12	Forward the fifth paragraph	T	<p>The second sentence in this paragraph references meeting the criteria set forth in this training and certification standard have surpassed a predetermined minimum level of performance and have been required to follow a "specific set of rules and guidelines" to achieve that. Again, the Supreme Court rejected a prescriptive "all-things-considered" mechanistic approach in Florida v. Harris. There are numerous ways to train a detection canine and canine handler. The "all-things-considered or a prescribed extensive set of rules" that must all be met was rejected in Florida v. Harris.</p>		<p>Reject: the commenter did not provide any actionable resolution with the comment and the CB cannot make modifications based on interpreting the comment.</p>
13	Forward the fifth paragraph	T	<p>The third sentence of the fifth paragraph states, in part, "to minimize individual discretion on the part of handlers and examiners/assessors." The proposed standard has over three pages on how the canine and canine handler shall be trained. The definition of certifying official/assessor is one sentence in length. This paragraph states, in part, allows approximately trained individuals to assess and review the canine team's performance.</p>		
15	Continued		<p>A formal accreditation program for certifying officials/assessors among national bonafide canine certifying organizations results in a highly skilled professional who has extensive experience, including but not limited to canine selection, canine problem solving, emergency canine first aid, relevant canine case law, understanding of how odor moves in a given environment, odor availability, canine olfaction, detection risk in various search environments the canine team will be deployed, the human decomposition process in various environments and extensive training on running a certification that is free of evaluator basis. They have extensive training and are critiqued in single-blind, modified double-blind, and understand double-blind testing, including its limitations. They prepare a detailed written canine and handler training curriculum in the discipline they are seeking to become a certifying official/assessor that is reviewed by their accreditation board, and they take an extensive written test and appear before the accreditation board for an oral board question and answer secession prior to becoming a certifying official/assessor.</p>		<p>Reject: This document is not intended to provide the requirements for the certifying officials, as stated in the scope, this document is "requirements for the training, certification, and documentation pertaining to canine teams trained to search for human remains on land." An accreditation program for certifying officials/assessors is outside the scope of this document.</p> <p>Additionally, the commenter did not provide any actionable resolution with the comment and the CB cannot make modifications based on interpreting the comment.</p>

17	Continued		Until a joint research project of scientists and accredited certifying officials/assessors can be conducted with a statistically significant number of certifying officials/assessors to evaluate signal-blind, modified double-blind, and double-blind certification testing, the near-term focus should be on the training backgrounds of the certifying officials/assessors, including whether further training should be developed and required for non-accredited evaluators/assessors. See further comments set forth below regarding double-blind testing.		
18	Page 1		Change requirements to recommendations in the first sentence.		Reject: this document was approved by the consensus body and the ASB Board to be written as a standard with requirements.
19	Page 1		Terms and Definitions - Please consider making the document clearer; when a defined term within the Terms and Definitions of ASB Standard 076 is used within this document, it should always be in bold. When a term is used in this document that is a defined term that is defined in another ASB publication, that term should be set forth in italics and have a footnote reference to the ASB Standard where the term is defined. An appropriate example is the definition of 3.2 alert, which includes the terms final response and indication within the definition. However, the final response and indication are defined in another ASB Standard and are not defined within the proposed ASB Standard No. 076. Accordingly, those two terms should be in italics and a footnote reference to where the prescribed definition can be located.		Reject: This document is written to the guidelines provided by the ASB for the formatting of documents, for consistency across all ASB documents.
20	Page 1		Fix the font size.		Reject: the font sizes in this document comply with the ASB guidelines for document format.
21	Page 1		3.4 Area Search - Please insert the word "outside" between designated and the word area.		Reject: Area Searches can be done inside as well.
22	Page 1		3.5 Assessment - Change the definition to the following: An evaluation during training and/or certification process; a tool to assess the canine team's ability to accurately conduct a sniff of a designated area.		Reject: "sniff" is not a term used in this document and is not appropriate for this definition.
23	Page 2		Blank Search - Change the definition to the following: A training or certification exercise in which target odor is not placed/concealed within the area by the certifying official/assessor.		Reject: The recommended definition is overly complex and not necessary. The definition provided is consistent with the definition in the other documents produced or in process by this consensus body.
24	Page 2		3.8 Blood - Insert the word human between "the" and "heart" in the first line of the definition, and in the second line, insert human between all and body.		Reject. Not all blood flows through a human heart. This is the overarching term and applicable to human and animal blood (distractors).
25	Page 2		3.8 Blood - What analysis was conducted to determine that fresh blood that is twelve hours old is frequently encountered in a high number of deployments? Is it practical to transport "fresh" human blood to a certification that in the Western United States could require several days of driving to a certification location?		Reject with modification: current research defines "fresh blood" as less than 24 hours. Section updated.
27	Continued		Is the definition of fresh blood consistent with the research set forth in Decomposing Human Blood: Canine Detection Odor Signature and Volatile Organic Compounds J Forensic Sci, March 2019, Vol. 64, No. 2?		Reject with modification: current research defines "fresh blood" as less than 24 hours. Section updated.
29	Continued		Insert "Human" before sweat in the NOTE.		Reject with modification. Note was removed. Human was added before sweat in the Notes within the document

277	1	T, E	Similar to what is done under the standards for the training and certification of canine detection of explosives (ansi/asb 092), it might be good to mention here the different types of assessments being addressed: wilderness, buried, etc. Also, the first sentence is not a complete sentence.	Change the first sentence to something like the following: "This standard states requirements for the training, certification, and documentation pertaining to canine teams trained to search for human remains on land, including canines used to find human remains in a wilderness setting, buried, in an urban exterior environment, within a building/structure, in debris piles, and in a motor vehicles."	Reject: that is too perscriptive for a scope. That level of detail is addressed under Assessments.
363	3.4	E	"Area search" used as a verb?	Suggest definition as a Noun: The systematic search of a designated area for target odor conducted by an air scenting canine.	Reject: The definition was approved by the consensus body and published in ASB TR 025.
278	3.5	T	This is the same definition as 3.54, and could lead to problems later if one definition is revised but the other one isnt.	I would replace the definition with "See Section 3.54.")	Reject: The definitions were approved by the consensus body and published in ASB TR 025.
364	3.5	E	"Assessments" drop the "s" for consistency with the definition.	should be Assessment (not plural)	Reject: The definition was approved by the consensus body and published in ASB TR 025.
365	3.6	E	avoid use of "measureable" - measureable how?	suggest use of "observable" "articulable"	Reject: The definition was approved by the consensus body and published in ASB TR 025. We recommend submitting this comment when the 2nd edition of TR 025 is being worked on.
409	3.8	E	Fresh and aged blood should be defined separately as the current definition combined with the note adds unnecessary complexity. Also, one of the categories must contain 12 hours. So, fresh blood should be "equal to or less than 12 hours old" OR aged blood should be "equal to or more than 12 hours old." Finally, when is the start of the count? When it left the body it came from? When it was transferred to that surface? We have suggested wording but feel free to adapt if it is inaccurate based on the subcommittee's intent.	<p>3.8 Blood</p> <p>The fluid consisting of plasma, blood cells, and platelets that is circulated by the heart through the vertebrate vascular system, carrying oxygen and nutrients to and waste materials away from all body tissues.</p> <p>3.8.1 Fresh blood</p> <p>Blood that left the vascular system it was derived from less than 12 hours ago.</p> <p>3.8.2 Aged blood</p> <p>Blood that left the vascular system it was derived from 12 hours ago or more."</p>	Reject with modification: current research defines "fresh blood" as less then 24 hours. Section updated.
408	3.9	E	Why are "Sweat, saliva, vomit, and semen" not considered human decomposition fluids/body fluids?	A reason should accompany the list and statement in the "NOTE".	Accept with modification. Note was revised for clarification. It was also removed from the defintion and added to any portion of the document that addresses decomposition fluids. Term was also revised to remove "body"
366	3.9	E	add urine and fecal fluid/waste material?	add "urine and fecal fluid" to list of NOT considered decomposition fluid	Accept with modification. The note was removed from the definition and added to any portion of the document that addresses decomposition fluids. "urine and feces" added to the note.
279	3.9	T	This definition is confusing as it is not entirely clear if it refers only to fluids associated with decomposition, or encompasses human body fluids such as urine not associated with decomposition. Also, one of the examples - "decomposition fluids" - seems to be self-referencing.	Change the definition to "Fluids produced by or associated with decomposing human remains (e.g., blood, liquified human tissue).	Reject with modification. Term revised to decomposition fluids and revised to match what was approved for in the approved TR 025.
31	3.10 canine handler		Change the definition to the following: A person possesses the skills to handle a canine in a specific discipline and maintains those abilities through field applications, maintenance training, or continuing education.		Reject: The defintion was approved by the consensus body and published in ASB TR 025.
280	3.12	T	It might be good to use the word "standard" since that is used below in 3.14.	Append the definition with ", as defined by a standard of a certifying authority."	Reject: The defintion was approved by the consensus body and published in ASB TR 025.
281	3.14	T	The definition lacks clarity: (1) Is the person affiliated with the certifying authority, the group the handler is affiliated with, or both? (2) "...on behalf of an organization or entity...": is this the certifying authority or the unit the handler is affiliated with? (3) "standard within the organization": is this the certifying authority?	Either change "organization" to "certifying authority" or add "certifying authority" in parathenses after the words "organization".	Reject: The defintion was approved by the consensus body and published in ASB TR 025.

33	3.14 certifying official/assessor		Please see my earlier comment regarding the accreditation training and education of the certifying official/assessor set forth above regarding the fifth paragraph in the "Forward" in ASB Standard 076, First Edition.		Reject: the commenter did not provide any actionable resolution with the comment and the CB cannot make modifications based on interpreting the comment. Additional, the definition has minor modifications based on other comments received and the CB feels it is appropriate as currently written.
34	3.15 Change in Behavior		Please modify the next to the last sentence to the following: The initial change in canine behavior associated with odor acquisition typically leads to tracing the odor plume to its substance.		Reject with modification: "canine's" added prior to "initial" for clarification. The remainder of the recommendation is not consistent with wording used in other documents produced by this consensus body and "plume" is too detailed for this definition.
367	3.15	E	"This differs from other olfactory interest that otherwise are exhibited by the canine in response to the daily environment. Tadd urine and fecal fluid/waste material?"	Grammar - change to: " This differs from other olfactory interest that is otherwise xhibited by the canine in response to"	Accept.
282	3.15	E	First sentence: need a comma after the word "handler".	Add comma	Accept.
283	3.15	T	The third sentence is not needed and introduces uncertainty into this definition as not all COBs will result in a K9 being able to follow a scent to its source.	Delete third sentence	Reject: The definition was approved by the consensus body and published in ASB TR 025. We recommend submitting this comment when the 2nd edition of TR 025 is being worked on.
284	3.16	E/T	The adjective "competent" seems unnecessary and normative. It is also not used to qualify "handler", "canine team", etc. The definition is self referencing.	(1) Remove "competent" from the label and add to the definition if you feel it is necessary to keep. (2) Change "to train" to "impart canine scent detection skills and knowledge to"	Reject with modification: The consensus body has previously approved "competent" to be kept. The definition has been revised to be consistent with previously published documents.
368	3.16	E	replace "suitable or sufficient"	replace with "relevant and sufficient"	Reject with modification: "suitable or sufficient" removed per recommendations from ASB guidelines. The definition has been revised to be consistent with previously published documents.
35	3.17 Concealed		Change the heading to concealed substance and revise the definition as follows: Is a substance that is obscured from the canine team's sight.		Reject: existing definition is concise and appropriate for this document.
36	3.18 Concentration (chemical)		Where is this definition used within the Standard?		Reject: "concentration" used in Section 4.2.1.5
37	3.20 contamination		Please revise the definition of Contamination to the following: Contamination - It occurs when the odor signature emitted from a target substance is contaminated by non-target odors that are present within the odor picture (e.g., including pungent masking odors present in the odor picture and/or odor emitted from the training aid containment system itself when the containment system is used habitually without conflicting its odor).		Rejection: The recommendation is not written as a definition but an example. The definition was approved by the consensus body and published in ASB TR 025.
369	3.20	E	3.20 Contamination: When an odor is inadvertently introduced. Contamination can include the following: contamination of a search area with a target odor or contamination of a target aid with competing odor.	Recommend change to: "When an odor is unintentionally introduced. Contamination can include the following: contamination of a search area with a non target odor or contamination of a target odor with a competing odor."	Reject: The definition was approved by the consensus body and published in ASB TR 025.
39	3.20 Contamination		Please revise the definition of Contamination to the following: Contamination - It occurs when the odor signature emitted from a target substance is contaminated by Competing Odors that are present within the odor picture (e.g., including pungent masking odors present in the odor picture and/or odor emitted from the training aid containment system itself when the containment system is used habitually without conflicting its odor).		Rejection: The recommendation is not written as a definition but an example. The definition was approved by the consensus body and published in ASB TR 025.

40	3.21 Containment System		Please revise the definition of Containment Systems to the following: Containment Systems - (1) Any means of restricting Competing Odors from inadvertently becoming part of the odor signature, (2) any means of restricting the dispersion of odor emitted from a target substance, (3) any means of preventing the target substance from contaminating the search area (e.g., vapor barriers...etc.), and, (4) any means of limiting a canine's access to the target substance during training or certification to prevent consumption, movement, or relocation.		Reject: Unnecessarily complex for the definition needed.
285	3.23	T	This definition is extremely vague, difficult to understand, and open to misinterpretation. It also doesn't seem to be consistent with the one-time use of the phrase in section 4.3.3. I think of controlled search as one where the dog is either on leash or where the dog works in close proximity to the handler; in either case, the handler is able to exercise a lot more direction/control over the search pattern and where the dog goes compared to a free search.	Revise definition or delete.	Accept with modification. Second definition added to clarify the term.
445	3.24	T	debris: a wilderness or urban area that has had a natural disaster i.e mudslide, landslide, tornado, hurricane or wildfire	Debris: scattered material, may be found in wilderness or urban areas; i.e. soil and sediment, vegetation (trees, shrubs), municipal solid waste (household garbage, personal belongings), demolition debris or disaster debris i.e. explosion, mudslide, landslide, tornado, hurricane or fire.	Accept with modification: Definition as recommend by the commenter accepted with the removal of "wilderness or urban"
370	3.26	E	Shouldn't need to include "which is discoverable." Any documentation/record is potentially discoverable	suggest removing "which is discoverable"	Reject: A new trainer may not realize this information so it is good information to keep in the definition for educational purposes.
41	3.27		Please revise the definition of detector/detection canine/detector dog to the following: A canine trained to detect the odor signature emitted from a substance and give a trained final response.		Reject with modification: Definition appropriate for the document as written. Second sentence moved to a note.
42	3.29		Please revise the definition as follows: In the evaluation of a canine team, neither the certifying official/assessor nor the canine team knows the location of the target substance or whether the odor signature is present.		Reject with modification: now "canine team" but did not add "nor the canine team knows"
43	3.29		See earlier comments regarding Modified-Double-Blind v. Double Blind.		Reject: the commenter did not provide any actionable resolution with the comment and the CB cannot make modifications based on interpreting the comment.
286	3.31	T	If there is a difference between an evaluator and a certifying official/assessor (defined in 3.14), it would be good to note that here.	Either add a brief sentence to note differences between the two definitions, or note that they are synonymous.	Term and definition removed.
371	3.31	E	suggest and/or not just "or"	suggest:evaluator the performance of canine, canine handler,and/ or canine team while showing no bias or partiality.	Term and definition removed.
38	New definition - Competing Odors		Competing Odors - The odors present within the odor picture that are not part of the odor signature the canine is trained to detect.		Reject: Term not used in the document.
44	3.31		See the comments above regarding the "Forward" section of the ASB Standard 076 that are set forth above.		Term and definition removed.
45	3.32		False Final Response - Revise the definition as follows: In a controlled environment, a trained final response is demonstrated by the canine and called by the canine handler in the absence of the odor signature.		Accept with modification. Definition modified to the CB approved definition for false response in TR 025
46	3.33		False Hole - Please revise the definition to the following: Depression, void, or disturbed earth that is intentionally created in a search environment by the assessor/evaluator/handler that does not contain a target odor substance.		Reject with modification: evaluator not used in the document, replaced with certifying official. And final sentence revised to: This is a distractor depression or void.

47	3.33		Note: The disturbed earth and/or depression that does not contain a target odor substance may become cross-contaminated when the odor signature is blown to a blank hole, or in the absence of wind, the odor signature of human remains may follow the topography i.e., downslope from a hole which contains a target odor substance.		Reject: the definition is not the appropriate place for this level of description. Specification for the false hole distance is included in 5.8.1.2.12.2 i) and should mitigate the opportunity or possibility of cross contamination.
48	3.34		Fresh Stage - Please reference the scientific research that supports the odor signature of volatile organic compounds for human remains aged no longer than 12 hours old is different greater than 12 hours old. Please reference the scientific evidence that decomposition throughout the United States would be the same within a 12-hour decomposition window.		Reject with modification: current research defines "fresh blood" as less then 24 hours. Section updated.
448	3.34	T	fresh stage: human decomposition aged not longer than 12 hours old, for example fresh blood fresh stage: human remains aged no longer than 12 hours old or does not show signs of decomposition	remove "human decomposition"; if it is decomposed, it is not fresh	Reject with modification: current research defines "fresh blood" as less then 24 hours. Section updated.
449	3.37	T	human decomposition: the postmortem self-digestion and degradation of a human cadaver human decomposition: the postmortem breakdown and degradation of the human body, includes putrefaction, mummification, and adipocere formation	self digestion is only in certain organs and not bacterial mediated; we call that process autolysis	Reject with modification: mummification and adipocere formation are not necessarily a part of human decomposition, depending on the environment. Definition modified to read: The postmortem process in which tissues and macro molecules in human bodies breakdown into simple organic matter over time.
287	3.39	T	Odor recognition is one of the primary fundamental skills taught during this phase; it is different from and generally precedes discrimination, and should be added to the definition.	Change "basic odor discrimination" to "basic odor recognition and discrimination"	Accept.
49	3.39		Initial Training - Please add canine critical drive building (hunt, air scent, retrieve, and prey drives) to the definition.		Reject: critical drive it out of scope for this document.
50	3.40		Law enforcement canine handlers do not consider interest a component of the characteristic pattern of untrained behavior changes exhibited by the canine when it encounters the odor signature. Please revise the definition within the item (1) to exclude the reaction to the odor signature the canine is trained to detect.		Reject: This standard include law enforcement and non-law enforcement teams, therefore the definition is appropriate for the document.
52	3.40		Please revise sentence (2) to the following: Pattern of behavior following the canine's initial reaction to a non-target odor when the canine displays a motivation to trace it to its source (e.g., dog odor, human scent, distractor...etc.).		Reject: Canine's can display interest in target and non-target odors.
288	3.41	T	I think of maintenance training as that which occurs after certification and is needed to preserve or increase the level of proficiency demonstrated at certification. As written, this definition seems to apply to any training beyond that which is defined in 3.39, which doesn't seem right.	Change the word "training" to "certification"	Reject: The term and definition have been approved by the consensus body in TR 025.
289	3.45	E	The use of the phrase "false positive" is inconsistent with other terminology used in the document, notable the definition at 3.3.2.	Change "false positive" to "false final response".	Accept.
53	3.45		Change the first sentence to the following: A characteristic pattern of behavior changes indicative of the odor signature that is followed by a final response and is called by the canine handler, which cannot be confirmed by the canine handler or through other investigative techniques.		Reject with modification. Definition recommended is overly complex. "by the canine handler" removed to clarify the definition.
372	3:45	E	Non Productive or Unconfirmed Response?	Suggest adding Unconfirmed Response with the same definition	Reject: "unconfirmed response" is not used in this document.
424	3.47	T	This definition begins with: "Volatile chemicals emitted..." I would recommend changing this to "Vapor phase chemicals emitted..." My reasoning is that "volatile" is a poorly defined term that describes a chemical's tendency to evaporate. Vapor pressure is more accurate for this. Only things in the vapor phase can be smelled, so odor is better defined as vapor phase chemicals.	Replace "volatile" with "vapor phase"	Reject: Things with higher vapor pressure are more volatile. Additionally this term and definition has been approved by the consensus body in TR 025.
425	3.48	T	Please consider adding a phrase like "Particularly bulk movement of the air" to this as this would be the primary way odor is dispersed.	Add recommended text	Reject with modification: Term revised due to comment #290

290	3.48	T	The phrase defines the factors affecting dispersion, not dispersion itself.	Change to "The permeation/movement of odor in an environment, which is affected by environmental conditions/factors/influences."	Accept with modification. Definition revised to recommended, other than "permeation" replaced with "diffusion"
54	3.50		Odor Recognition Assessment - Please revise the definition to the following: A test of the canine's ability to render its trained final response to the odor signature in a controlled environment.		Accept with modification: Definition revised to read: A test of the canine's olfactory ability to discriminate and perform its trained final response..."
55	3.50		Note: The Odor Recognition Assessment regarding distractors such as examination gloves, animal remains, and blank containers should be removed from the odor recognition assessment and concealed directly in blank areas to prevent cross-contamination.		Reject: recommendations do not belong in the definitions.
291	3.50	E	Wording doesn't seem quite right	Change "trained" to "perform its"	Accept with modification: Definition revised to read: A test of the canine's olfactory ability to discriminate and perform its trained final response..."
56	3.52		Operational Assessment - Revise the definition to the following: Operational Assessment - A test conducted (single-blind or modified-double blind) in an operational environment in which the team will be deployed.		Reject: No actionable resolution provided. The comments provided are not appropriate revisions to the definition of a term. "modified double-blind method" is not addressed in this document. The "modified double-blind method" that is recommended here is a double-blind.
57	3.52		Note:		
58	3.52		Note: Modified Double-Blind – Positioning evaluators behind barriers. By simply positioning evaluators at locations where they can observe the team, but neither the handler nor canine can observe them, the possibility of evaluator cueing is eliminated. This fulfills the intent of Double-Blind testing without dealing with the negative effects associated with it. Double-Blind testing is logistically impossible when testing multiple teams. The certifying official lack of knowledge of test design is compromised once the first few teams are tested.		
59	3.52		With Modified Double-Blind method:		
61	3.52		The certifying official/assessor is positioned in a situation where he can see, and communicate with, the team, but neither the handler nor canine can see the evaluator;		
62	3.52		The exercise is then conducted like any other certification exercise;		
63	3.52		The certifying official/assessor remains concealed until the exercise is completed;		
64	3.52		The certifying official/assessor can observe ongoing environmental conditions to assess where the canine should give its trained final response based on 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.);		
65	3.52		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 substance and not the handler, no other canine handler has compromised the operational assessment by giving another handler information regarding the expected outcome...etc.);		
66	3.52		The certifying official can observe the canine and stop the canine team when the dog exhibits signs of heat exhaustion to help prevent the canine from going into heat stroke;		
67	3.52		The certifying official/assessor can observe whether the canine has urinated or defecated at or near the target odor substance or has come in contact with the target odor substance.		
68	3.52		The certifying official/assessor can confirm correct alerts so the canine can be rewarded as usual.		
71	3.52		Please insert a definition for Modified-Double Blind under Terms and Definitions.		

292	3.53	T	This definition seems to refer to maintenance training rather than operational proficiency. I think of operational proficiency as a level of competence that has to be demonstrated by the team in order for it's organization to be willing to deploy it on actual operational search missions. Ways of demonstrating such proficiency include certification, engaging in regular maintenance training, etc.	Change definition to "A high level of competence that demonstrates the canine team's capability to perform desired tasks on operational search missions. Ways of demonstrating such proficiency include certification, engaging in regular maintenance training, etc."	Accept with modification: Recommend definition used with the beginning revised to read: "A measure of the canine team's..."
293	3.54	T	Assessments can take place at different locations and at different times than regular training.	Change to "An evaluation of a team's ability to meet a standard."	Reject: assessments can be part of training. Additionally, term and definition approved by the consensus body in TR 025.
72	3.54		Proficiency Assessment - Revise the definition to the following: An evaluation tool to assess a canine team's ability during training.		Reject: Term and definition approved by the consensus body in TR 025.
73	3.55		Random/Randomized - Instead of using randomization of the number of target odors and their placement location, instead the focus of the ASB should be on discipline-specific accredited qualifications of the certifying official/assessor. An accredited certifying official is trained to select the appropriate number of target odor substances and strategically place those target odor substances based on environmental conditions and detection risk within a given test area. See comment on the Forward fourth paragraph section of the proposed ASB Standard 076 set forth herein.		Reject: Term and definition approved by the consensus body in TR 025. The recommendations are outside the scope of this document.
373	3:55	E	Need comma and other wording: When the choice of something or the placement of something is random the source placed is equally likely to be either location.	When the choice of something or the placement of something is random, the source is equally likely to be placed in either or any placement or location.	Accept with modification: comma added. End of definition revised to read: "...equally likely to be in any location."
374	3:56	E	Needs rewrite: A record/ log in the use of a trained canine team in an operational environment, as opposed to training records. A log constituting a piece of evidence about the past, especially an account of an act or occurrence kept in writing or some other permanent form, i.e., electronic format.	Recommend: A record/ utilization log (as opposed to training record) documents the use of a trained canine team in an operational environment. A utilization log constitutes an accurate account of an operational event and is kept in writing or some other permanent form, i.e., electronic format.	Reject with modification: Definition completely revised to define only "record"
294	3.56	T	This seems similar to 3.26. If there are differences between the two, I would note those. If not, I would add a note that they are synonymous.	Revise definition	Accept with modification: Definition completely revised to define only "record"
295	3.57	E	Minor wording changes are needed to reflect that fact that reliability is a scale	(1) Add the following to the beginning of the second sentence: "The extent to which the canine exhibits a" (2) In the third sentence, change "Evidence that establishes" to "The extent to which evidence establishes"	Accept with modification. Definition revised so that "the extent to which" at the beginning applies to each sentence.
426	3.58	T	This definition starts with "Odor that originated from any substance/subject that may or may not be physically recoverable or detectable by other means." I would argue if it is physically recoverable then it is not residual odor. If it is not recoverable/detectable then it is residual. Consider removing the words "may or" from this.	remove recommended words	Accept with modification. First sentence revised to read: "...target source/subject that lingers and may not be physically..." and second sentence deleted.
296	3.59	E	Duplicate definition of 3.66, which could cause problems during subsequent revisions if both aren't changed accordingly.	I would either delete this, or replace the definition with "See Trained Final Response (3.66)".	Accept. "response" deleted.
74	3.59		Response - Revise the definition to the following: A behavior that a canine has been trained to exhibit upon locating the source of the odor emitted from the target odor substance. This canine behavior may be passive (sit, stare, down, point) or active (bite, bark, scratch, jump, etc.).		Term and definition removed.
297	3.60	T	Routine training applies to both operational canine teams and canine teams working to become operational. I think of it as regularly scheduled training that is held by the organization responsible for deploying the canine teams.	Revise definition	Reject. The definition is accurate as written and previously approved by the consensus body in ASB TR 025.

75	3.61		Set Time - Revise the definition to the following: The length of time elapsed between the target odor substance being placed within an environment and when the canine is deployed to hunt for the target odor plume.		Reject. The definition is accurate as written and previously approved by the consensus body in ASB TR 025.
298	3.62	T	Minor word changes might help improve clarity.	(1) Change "complete an exercise" to "complete an exercise (i.e., locate a target odor or not perform false final response during a blank search)" (2) Change "outcome" to "outcome (whether target odor is present in search area, its location if present, and whether the canine team successfully located the target odor)."	Reject. The recommended modifications are appropriately contained in the body of the document and are too descriptive for this definition.
427	3.62	T	I think this definition would be improved by adding the words "present at the location" between the words "evaluator" and "knows."	Make recommended edits	Reject with modification: Comment will be provided to the TR 025 WG when the document is revised. Other modifications made to the definition based on other comments.
375	3.63	E	Should dimension be square inch or square cm? As written it could be the tip of a toothpick dragged 2" which is not a functional odor threshold.	recommend 2" square. 2" x 2" to 2" x 4"	Reject with modification. Definition revised to remove measurements.
76	3.63		Smear - Revise the definition as follows: A small amount of the target odor substance that is placed in the Urban Exterior, Interior Building Structure, or Vehicle search area by touching a wet target odor substance with an object, gauze, a gloved hand, etc., and pressing the transferred target substance onto another surface within one of the aforementioned search areas for a minimum of 2 in (5.08 cm) and a maximum of 4 in (10.16 cm).		Reject: recommended modifications are too restrictive.
78	3.63		How was the amount of transfer determined in 3.63, and what age of decomposition may be used for the smear?		Reject: No actionable modification recommended. Additionally, the how and age of the smear are too restrictive for this definition.
79	3.67		Revise the definition as follows: Training Aid - A target odor substance that emits the odor signature the canine is trained to detect.		Reject. The definition is accurate as written and previously approved by the consensus body in ASB TR 025.
80	3.68		Revise the definition as follows: Urban Search - Is a canine sniff for its target odor signature in a city environment.		Reject. The definition is accurate as written and previously approved by the consensus body in ASB TR 025.
82	4.00		4 Canine Team Requirements et all - See comments set forth in the Forward section of ASB Statement 076 herein.		Reject: This document is not intended to provide the requirements for the certifying officials, as stated in the scope, this document is "requirements for the training, certification, and documentation pertaining to canine teams trained to search for human remains on land." An accreditation program for certifying officials/assessors is outside the scope of this document. Additionally, the commenter did not provide any actionable resolution with the comment and the CB cannot make modifications based on interpreting the comment.
410	4.1.1	E	How does one determine what a "competant trainer" is if there is not validation of the training/trainer regimen?	This question should be answered somewhere in the document - either in this section or in a definition of terminology.	Reject: Competent canine trainer defined in 3.16
411	4.1.2	E	The list is unorganized and difficult to follow.	Group the list items together in the following categories: Study items, dog/handler items, and recording items.	Reject: The organization of this list is in the order of operations and has been made consistent with other consensus body approved documents in the discipline.
423	4.1.2	T	legal training in (q) should explicitly include mention of the Brady rule	add to (q) the following bullet point: - disclosure requirements, including the Brady rule requiring disclosure to the defense of evidence in the possession of the prosecution and its agents that is "favorable" to the defense;	Reject: This is a scientific document, citing one rule is not appropriate.

299	4.1.2 (f)	T	This encompasses a lot of different things and it might be good to provide some examples: e.g., temperature, humidity, soil type, setting (e.g., outside vs building interior), suspected location (buried, surface deposition, concealed), etc.	Add examples of different types of environmental conditions affecting odor dispersion	Accept.
300	4.1.2 (h)	T	Since "rewarding the canine" can encompass a number of different topics, it might be good to provide some examples.	Append the sentence with the following: "(e.g., type of reward, timing when issuing reward, interment reward schedule, etc.)."	Accept with modification: "(e.g., type of reward, timing, reward schedules)." added.
437	4.1.2 i	E	Add intext citations	At a minimum reference: 1.Lit, L., J.B. Schweitzer, and A.M. Oberbauer, Handler beliefs affect scent detection dog outcomes, in Animal cognition. 2011, eScholarship, University of California. 2.Zubedat, S., et al., Human-animal interface: The effects of handler's stress on the performance of canines in an explosive detection task. Applied Animal Behaviour Science, 2014. 158: p. 69-75.	Accept: Citations added.
438	4.1.2 k	E	Add intext citations	At a minimum reference: 3. Farr, B.D., M.T. Ramos, and C.M. Otto, The Penn Vet Working Dog Center Fit to Work Program: A Formalized Method for Assessing and Developing Foundational Canine Physical Fitness. Front Vet Sci, 2020. 7: p. 470. 4.Gazit, I. and J. Terkel, Explosives detection by sniffer dogs following strenuous physical activity. Applied Animal Behaviour Science, 2003. 81(2): p. 149-161.	Accept: Citations added.
435	4.1.2 q	T	Recommend adding "orthogonal detectors (see Annex XX, Table XX.XX for additional details),"	after - effect of odor/scent dispersion, add "orthogonal detectors (see Annex XX, Table XX.XX for additional details),"	Accept with modification: orthogonal detectors added to 4.1.2 q and Table A.2
376	4.1.2 q	E	preparation of legal documentation, and	recommend change to "preparation of accurate logs and operational documentation which may become discoverable." Legal documents are prepared by lawyers not handlers.	Accept with modification: item revised to just "documentation". "preparation of legal" removed.
328	4.1.3	T	drop "scent" scent refers to live not HR		Accept. "scent" removed anywhere in the document where it was not appropriate.
301	4.1.4	T	I think you need something here on the storage and handling of training aids, especially since the handlers in many volunteer organizations possess their own training aids.	Add a sentence or paragraph that says something like "Canine handler training shall address techniques for handling and storing training aids."	Reject: there is a separate section of the document on handling and storing training aids.
412	4.1.5	E	What are search techniques?	Search techniques should be defined somewhere and some examples of search techniques that they shall be trained to use (a non exhaustive list) should be provided, ideally accompanied by some guidance about when each is appropriate.	Reject. Search Techniques are outside the scope of this document.
81			Note: See proposed revision to Building Exterior per 5.8.1.2.12.3. This definition will also need to be revised.		Reject. The comment on 5.8.1.2.12.3 will be addressed in that section.
377	4.1.5	T	recommend addition/clarification	recommend addition: In order to maximize search efficiency, canine handler training shall include search techniques which maximize the canines opportunity to encounter target odor.	Accept.
302	4.2.1	T	The adjective "competent" is undefined and unnecessary.	I would delete the adjective here and other places it is used in the document, or specifically define what "competent" means in Section 3.16.	Accept. The definition for competent canine trainer was revised.
378	4.2.1.5.	T	4.2.1.5 Training shall include exposing the canine to a variety of different types of searches, locations, and environments including the following variables:	Recommend caveat to the "shall" as follows: 4.2.1.5 Training shall include exposing the canine to a variety of different types of searches, locations, and environments structured to meet the typical mission requirements of the canine team's organization.	Reject. This content is included in 4.2.1.8.

379	4.2.1.7	T	For training, "shall" could cause problems. What people train on and for should meet their operational requirements. Routine training on Fresh and Blood < 12 hours as a "shall" is problematic and not operationally utilized. Nearly all calls are well after the initial 12 hours.	Change shall to "should" per operational needs - typical mission requirements.	Reject: In order to comply with this document, the dogs need to be trained on the full scope of this document.
303	4.2.1.8	T	It doesn't seem that this section is needed since the same requirement for the canine team is presented in Section 4.3.1.	Delete section	Reject. This is appropriate placed for this section of the document dealing with the Initial Training of the Canine.
329	4.3.3	T	"close prox to handler" not suppose to range?????		Reject with modification: "in close proximity to the handler" removed.
304	4.3.3	T	I wonder about the necessity of the word "controlled" here. Canines are sometimes used to search large wilderness areas for human remains, and I worry that search teams might misinterpret this to mean that they have to use the same technique for those searches as they would for a search of a vehicle or building interior.	Consider revising the definition of controlled search above, or delete the word "controlled". This is the only place in the document other than the definition where "controlled search" is used.	Reject: A controlled search indicates that the dog is under a verbal and visual control of the handler.
357	4.3.3	t	What is "...close proximity to the handler?" There are many variations of "close" depending on the individual, breed, and type of search being conducted.		Reject with modification: "in close proximity to the handler" removed.
330	5	E	someone is trying to rewrite 50 years of SAR. These are evaluators and not assessors and tests are certifications not assessments. Please don't reinvent the wheel here. The assessment/assessor is extremely poorly writtne and confusing.		Reject: commenter has not provided an actionable resolution and the WG/CB cannot assume the intended resolution. Assements and Evaluator have been defined in this document, and previously accepted by the consensus body in ASB TR 025.
414	Section 5	E	There are so many sub sections, sub sub sections, and sub sub sub sections that the clause locators are somewhat unweildy - could the document be restructured to reduce this?	Restructure the document to reduce the numbers of indented sections and sub sections. the numbering and indentation should also be consistent throughout the document, according to the style guide.	Reject: Though the ASB strives to not have too many levels in the documents, this document has been significantly worked on to achieve consistency and the maximum levels of consistency within this document and across the other documents approved by this consensus body.
83	5.4		Please revise the definition as follows: The desired outcome of the canine sniff is the correct identification of the number and location of the target substance and/or the odor plume.		Reject with modification: "placement" revised to "location" the remainder of the recommendation is covered by the term target odor. The note recommendation is also covered elsewhere in the document.
85			Note: When a target substance is elevated, depending on environmental conditions, the plume of odor may or may not be traced by the canine to the target substance because of voids that are not accessible by the canine (e.g., above the canine's head).		
86	5.5		Target odor substances prescribed by this proposed certifying standard/assessment "shall be the complete spectrum of human decomposition."		Reject: Section 5 covers assessments, a certification (section 6) is composed of multiple assessments therefore the complete spectrum of human decomposition can be tested within a certification.
88			The certification/assessment could contain only two target odor substances (prescribed minimums Area 1target odor substance and Buried 1target odor substance) and the additional required assessments potentially being zero target odor substances. With the potential of only two target odor substances, the certification/assessment will not include the complete spectrum of human decomposition. There is no requirement that the certifying official/assessor shall use target odor substances that are fresh, putrefied, or advanced decay. Moreover, there is nothing within this proposed Standard that prescribes the target odor substances for certification/assessment shall include the spectrum of high target odor thresholds. While the low threshold is defined for the certification/assessment, low threshold amounts of the target odor substance should be limited to Urban Exterior, Interior Building Structure, or Vehicle search areas.		

90			The possibility that a certifying official/assessor could place a smear/trace substance within twenty-one feet downwind of a much larger target substance would dramatically increase the time it would take to effectively clear an area during a certification/assessment.		
380	5.5	T	Use of shall is problematic - not every assessment/test/can have access to full spectrum of human decomp from fresh <12 hours to old. Again, <12 hours	change language away from "shall" to "should include a broad spectrum of human decomposition to include:"	Reject: Section 5 covers assessments, a certification (section 6) is composed of multiple assessments therefore the complete spectrum of human decomposition can be tested within a certification. An individual assessment may only test a subsection of the spectrum.
305	5.5	T	I prefer the language used in the explosive k9 standards, which stipulate "Detection of the following mandatory explosives..." Here, it is not entirely clear if the canine has to be assessed for each type of decomposition, or if any type of decomp could be used during one odor recognition assessment and the handler wouldn't know that. I would prefer that the standards state that the teams have to undergo odor recognition assessment for the following mandatory types of human remains: X, Y, X, etc.	Revise to "Canine teams shall be assessed on target odors from the entire spectrum of human decomposition.	Reject: 5.5.1 contains the requested information.
331	5.5.1.a & b	T	"fresh blood" "fresh decomp" - This is an impossibility for approximately 90% of teams in the field on the spot. We have no one who can draw blood or discard skin according to your definition of "fresh" which is same day. "Fresh" needs to be removed.		Reject: clarification of less than 24hrs and no visible putrefaction/early putrefaction clarify "fresh"
443	5.5.1	T	fresh' human decomposition- Unless we are permitted to "suspend" the decomposition using the freezing of human tissue, I'm not sure there will be adequate opportunities for teams to be assessed or certified going forward. This appears to me to be an unreasonable expectation unless a team specifically searches for fresh human remains such as in the USAR environment. Is this necessary for a generalized human remains assessment?	Reconsideration of standard	Reject with modification: Section 5.5.1 was revised for clarification.
91	5.5.1		Please change the sentence to the following: Target odor substance(s) may be comprised of the following examples:		Reject with modification: Section 5.5.1 was revised for clarification.
93			This revision is necessary since the stage of decomposition, the target substances, the quantity of the target substances, and mummification will all be mission and geographically specific.		
306	5.5.1	T	Since this is a standard used for certification purposes, I think the target odors used in the assessments need to be well defined, as opposed to being examples for a broad generic group. Also, to the extent possible, the standard should be applied in the same way to all teams being assessed; however, I believe the vagueness in this section could lead to different applications in terms of the number of odor recognition tests required for certification. Section 5.8.1.1.1 stipulates that one target odor be used for each odor recognition test. So how many odor recognition tests does the canine have to pass? It is not clear and should be.	Delete the word "examples" from 5.5.1. Break out sub-paragraph b into specific mandatory target odors that will be used along with blood and burned tissue for the assessments: e.g., putrefied flesh, mummified flesh, etc.	Reject with modification: Section 5.5.1 was revised for clarification. Certification requirements are in Section 6.
94	5.5.1 a)		Fresh blood - see earlier comment on the defined term 3.8.		No actionable resolution: current research defines "fresh blood" as less than 24 hours. Section updated.
95	5.5.1 c)		Please define burned tissue in the definition section to provide reasonable assurance whether the odor signature of burned material doesn't include other chemicals (e.g., accelerants) in the odor picture used to burn the remains.		Accept with modification, added "burned remains" to section 3.
307	5.5.2	T	To ensure that the training has appropriately taught the canine to generalize odor from aids used in training to odor from sources it has not encountered before, the training aids used in the assessment should not have previously been used to train the canine being assessed.	Add a sub-paragraph (d) which states something to the effect that: "Only training aids that have not been previously encountered by the canine shall be used."	Reject: The recommended change is not appropriate for assessments, only certifications.

96	5.5.2		Strike training aids and insert target substances in the first sentence and target substances in the second sentence.		Reject: "training aids" is the appropriate term for this section of the document. Training aid records are required to be maintained, that covers the verification. See sections 8 and 9.
98			How will the certifying official/assessor objectively verify that the target odor substances have been properly maintained, stored, and are in good condition?		
99	5.5.2 a)		Revise the sentence as follows: Containers used during the certification/assessment shall be permeable as possible to allow the target substance to effectively emit the odor signature (suet cage, vented jar, bag, etc.).		Accept with modification: training aids are the appropriate term for this section, not target substances. Section clarified to include that the containers completely contain the training aids, to eliminate "pours" and revised to indicate that the containers shall be as permeable as possible to maximize surface area for highest odor threshold while completely containing the training aid.
100	5.5.2 c)		Revise the sentence as follows: The physical mixture of target odor substances with Competing Odors (see earlier proposed definitions) should not be used in ongoing training. If mixtures of non-target odor substances with target odor substances are used, they should be utilized sparingly.		Reject with modification: competing odors are non-human odors, and the term is not used in this document. a) clarified to include that the containers completely contain the training aids, to eliminate "pours"
102			In light of 5.5.2 c), please clarify whether pours of target odor substances on the ground may be used for certification/assessments.		
4	5.5.2	T	Eliminate references to contact between soil and Human Remains	The document (in several places) cautions against allowing human remains samples to come in contact with soil. There is little doubt that the organisms in soil affect decomposition processes. That is substantiated by the references you cite. Even to an insensitive human nose, changes in the decomposition process affect the odor. Rather than avoid that reality, we should be giving the dogs as much relevant data in their training as is practical. That would include aerobic, anaerobic decomposition as well as training material that has had other exposure a deceased body would likely encounter.	Reject: There is no preclusion to training aids being contaminated with soil in training.
332	5.5.2.c	T	Soil is everywhere in searches and testing		Reject: There is no preclusion to training aids being contaminated with soil in training.
333	5.6	T	0.01 (5g) entirely too small for starter. This is very forensic. Change to quarter lb minimum. Is this a forensic certification?		Reject: Depending on the type of training aid(s), even small amounts can be odoriferous.
446	5.6	T	There are many "shall" statements: a minimum of 0.5 lb of training aid(s) shall be used for buried"	"a minimum of 0.5 lb of training aid(s) suggested for buried"	Reject: A minimum amount is required, so the shall statements are suitable.
103	5.6		Please revise the definition as follows: A minimum of 0.5lb (227 g) of target odor substances shall be used for buried operational assessments. A minimum of 0.01 lb (5 g) of target odor substances shall be used for all other assessments.		
105			If the stated purpose of this test is to standardize training and certification/assessment of canine teams, then the variability in the size of sources, the decomposition level of the target odor substances should be prescribed, area sizes (one-acre minimum to two-acres per 5.8.1.2.12.1), number of search areas (the assessment shall include a minimum of three search areas per 5.8.1.2.12.1 a)), the number of containers (odor assessment per 5.8.1.1.2 f)), .. etc. should be capped within a reasonable range.		
107			However, the time to conduct sniffs should be at the direction of the certification official/assessor based on area size, terrain, set times, environmental conditions, amount of vertical surfaces, weight and surface area of target odor substances, whether the canine team is working effectively, and stage of decomposition of target odor substances.		Reject: The minimum of 0.5lb of training aid was selected based on

109			Please add to an annex to the standard how the 0.5 pounds of target odor substance was determined to be the appropriate amount of buried target odor substance, including a discussion of the target odor substance's surface area v. the target odor substance's weight, the amount of decomposition of the target odor substance that is being buried, the depths, how soil type was considered in the set time, and research on how the above variables were evaluated to determine for the prescribed set times.		the knowledge and expertise within the consensus body. This accounts for skeletal scatter, small bones, and discarded weapons with human tissue or blood. The consensus body acknowledges that available odor does not correlate to weight, however weight is the only unit of measure that can currently be quantified and tested to.
111			The amount of decomposition of the target odor substance, including the surface area of the target substance, will significantly impact odor availability, set times, the time necessary to conduct the sniffs, and whether the decomposition spectrum is being tested.		
113			The possibility that a target odor substance of 0.01 lb could be used within a wilderness certification/assessment would dramatically increase the time to conduct a sniff of the designated areas. This would require very narrow sweep widths and cross-grid a designated search areas. Moreover, if a 0.01 lb target odor substance may be concealed 21 feet downwind of a much larger target odor substance, this would require the handler to conduct a spiral search from the larger target odor substance.		
115			Please revise the minimum target odor substance used in the wilderness sniff and prohibit trace amounts from being used within the wilderness search or dramatically increase the sniff times.		
381	5.7	T	5.7 When possible, prior to the first canine handler team entering the assessment area; a separate, nonparticipating canine handler team should be walked through the assessment area.	Recommend that use of the same area be avoided when practical. Better to have humans walk and touch areas (avoiding target odor contamination) than to walk a dog through.	Reject with modification: "handler" removed from "canine handler team" There is no prohibition to additional humans walking through the assessment area. This recommendation is to prevent olfactory cues of other canines from being used to locate target sources.
116	5.7		Prohibit using female dogs in heat to walk through the area prior to the certification/assessment or being tested prior to other canine teams.		
118			The note seems to imply that when another canine is walked through the area that it will solve the problems hormones left behind when a canine locates the target odor substances within the assessment area. The proposal will not change the limitation of double-blind testing.		Reject: If a canine cannot work through canine odor in any state, regardless of gender and status, that is a training issue.
120			Consider having the certifying official/assessor walk through the search areas so the canine cannot track directly to the target odor substance.		
421	5.7	E	Walk-through does not say why or who	State why (to proof search area) and who proven and competent dog	Reject: This is addressed in the NOTE.
413	5.8.1	E	Why is the assessment in this section intended to be single-blind?	A justification for single-blind assessment should be provided--this is not best practice, so a reason for this should be provided and an acknowledgement of the limitations of such an approach or, at a minimum, the subcommittee should recommend double blind components/encourage double blind where possible.	Reject. Section 5.8.2 covers double-blind assessments. This document outlines the components and paramers of the assessments, depending on the challenge being worked through will determine single- vs double-blind.
121	5.8.1.1		Please add an obedience control test with heeling, stay, recall, and emergency stop. Search and Rescue dogs frequently work in close proximity to other canines teams. This will also provide the certifying official/assessor an opportunity to see if the canine exhibits unwarranted aggression.		Reject: This is the odor recognition section, so that is not appropriate for this section. The appropriate amount of obedience is covered in 5.8.1.2.1
122	5.8.1.1 b)		Please create a defined term for "systematic search."		Accept.
123	5.8.1.1 d)		Please revise the definition as follows: The canine handler's recognition of the canine's alert.		Reject: This statement is intended for all behaviors up to and beyond the alert, not just the alert.

334	5.8.1.1.1a	E	How do you know what odor is trained or non trained?		Reject: The odors that shall be trained are listed in 4.2 and 5.5. A team not trained on the listed odors are not ready for the assessment or operational readiness.
382	5.8.1.1.1- 5.8.1.1.2 ORT	T	Not a fan of the ORT: it is very artificial, not at all representative of the field, and requires specific training which does not translate well to the actual mission of a HRD K9. Almost like trick training. It is great for laboratory testing but IME context of distractors placed and/or hidden in the field is a far better evaluation of a dogs accuracy. I have seen dogs rock an ORT and fail miserably when distraction are in the context of hides. It has some value for training but as a testing step, another task that serves little purpose in the field...forces handlers to "train for test" rather than training for the mission.	Just my experience and opinion on this. I am guessing this comment will fall on deaf ears but at the very least, I would lessen the set time. 30 minutes gives way to much time for the odor to cross contaminate across to other cans/containers. In addition, a set "amount" of target odor should be specified. When training a dog for ORT, they quickly learn to deep nose into the container. Also, very taxing re set up for multiple dogs if every can has to be clean (which they should be)... A more mission oriented evaluation would be practical lineups of for example, clothing piles, tool lineups (hammers/shovels/axes etc), rubbish cans, etc.	Reject: Please see the NOTE in 5.8.1.1.2.
420	5.8.1.1.2	E	allows for two passes, no time limit stated	Establish a time limit 5 or 10 minutes	Reject: Since two passes is the limit, there is no need for a time limit.
5	5.8.1.1.2 through 6.9		Condense certification procedures to reduce set up and run time.	I respect the desire to be thorough. My worry is that the proposed Standard sacrifices "good" by trying to achieve perfection. My rough estimate is that a team of 2 certifying officials would need 2-3 hours to set up the tests as proposed. Those sites would then need to be supervised during the set time before being used. Teams taking the test could spend up to 4 hours of search time. This likely forces the testing into a multi day process, with overnight supervision of any testing sources. For comparison, The United States Police Canine Association, Search and Rescue Dogs of the U.S. and The National Search Dog Alliance all use testing protocols that are fairly quick to set up and allow between 35 and 95 minutes of actual search time.	Reject: unfortunately the commenter did not provide an actionable resolution and the CB cannot assume a resolution for most of the standard from the statement provided.
3	5.8.1.1.2	F 2	A minimum of six feet between containers is ridiculous. Research has shown that dogs can correctly discriminate with as little as 2-3 ft between samples (Osterhelweg, Alexander). Better to set a min and max. Min of 2 ft MAX of 6 ft. It should be noted that since the handler must correctly identify the container their dog is TFR on, then if they lay half way in between and the handler calls the wrong container, the dog did not deserve to pass and needs to work on this skill. SIX feet distance can easily cause a miss on a grave.	Change to a minimum of 2 ft between containers and a MAX of 6 ft between containers.	Accept with modification: section revised to a minimum of 3 ft (0.914 m).
308	5.8.1.1.2 (e)	E	"final response" has not been updated to "trained final response".	Add "trained" before "final response"	Accept.
309	5.8.1.1.2 (f) (4)	T	This comment is based somewhat on the confusion regarding the number of odor recognition tests that will have to be administered. Here, recognition is being assessed of only one odor at a time. To make it easier on those who will be implementing these standards, I wonder if it wouldn't be better to require multiple target odors (all different) in a single assessment, similar to what is done in the k9 explosive standards.	Consider changing the total number of containers, target odors, and distractors used in a single assessment.	Accept.
310	5.8.1.1.2 (f) (5)	T	I would prefer making the animal distraction mandatory.	Consider revising in such a way that at least animal distraction has to be used with the three distractions being optional.	Reject: There is no prohibition for an assessor to use animals as distractors in every test if desired.
311	5.8.1.1.2 (j)	E	This duplicates 5.8.1.1.2 (k)(3).	I would delete this section, but use the language here to replace that in 5.8.1.1.2 (k) (3).	Reject: k) is solid pass/fail criteria.
312	5.8.1.1.2	T	To help ensure that the standards are applied uniformly, I would suggest adding a maximum weight to the target sources used in odor recognition assessments (as is done in the k9 explosive standards at 5.7.2.3)	Consider adding a sub-paragraph "L" that states the maximum weight that can be used for odor recognition tests.	Reject: It is not possible to put a maximum without limiting the composite samples.

124	5.8.1.2 b) and d)		Please clarify the difference between these two items.		Reject: b) corresponds to performing the search and d) is corresponds to the handler recognizing what the canine is telling them.
125	5.8.1.2 e)		Change the wording such that the assessor shall immediately compare the search results with the parameters of the search.		Reject: The recommendation would not be possible for a double-blind assessment.
126	5.8.1.2 f)		Please revise the definition as follows: The number of containers shall be five.		Reject: no reason was given for five.
127	5.8.1.2 f2)		Please revise the definition as follows: The odor recognition containers shall be spaced 6 ft (1.82 m) apart and arranged to minimize cross-contamination of containers (e.g., the wind or air current should not be blowing down the row of containers).		Accept with modification: distance revised to 3 ft (0.914 m) based on comment # 3. Revised text from recommendation added to the end of the section: "and arranged to minimize contamination of containers"
128	5.8.1.2 f3)		Please change the wording as follows: Each odor recognition target odor substance and distractor shall be handled in the same manner (e.g., examination gloves..etc.) and placed in a clean, unused container that is absent of visual cues and external markings of the content of the containers (cardboard boxes, vented paint cans, vented plastic tubes, etc.). The containers used shall all be identical and should not be sealed or have lids and allow for the odor signature to be readily available. To minimize cross-contamination of the target odor signature, each canine team shall have a clean set of containers with the identical distractions.		Reject: The recommended text is in conflict with the requirements of this assessment.
129	5.8.1.2 f4)		Please revise the definition as follows: One target odor substance shall be placed among the sample containers.		Reject with modification: the requirement has been clarified based on comment # 309 and what has been approved in previous documents from the Consensus Body.
130	5.8.1.2 f5)		Please revise the definition as follows: Four distractor odors shall be uncontaminated by the target odor signature. The distractors shall be selected from a predetermined list, including but not limited to:		
131			Clean examination gloves;		
132			Clean glass jar or training aid delivery device;		
133			Clean gauze pad; and		
134			Clean cotton balls.		
136			Note: I believe the Illinois State Police list their distractors, or they are well known in advance of their odor recognition assessment. Accordingly, the most common distractors can be incorporated into ongoing maintenance training.		
138			Search and Rescue canine handlers travel vast distances at their own expense to certify their canines; the odor recognition test shouldn't be a gotta moment with distractions that are unlikely to be encountered during the normal canine sniff. They should be known in advance.		Reject: The suggested distractors are not limited by the current examples, no need to limit potential distractors.
140			To present cross-contamination, a dead animal (preferably naturally occurring) or dog food can be conflicted in a blank area search area away from the target odor signature. A list of distractors should be identified in the standard to facilitate training and preparation for the assessment. Anyone would fail the odor recognition assessment when the odor emitted from the distractor is so strong that it compromises the target odor signature.		
142			As part of the odor recognition assessment or the operational assessment, it doesn't make sense to conflict handler's scent. Assuming that the handler's scent has become part of the target odor signature and another person is setting up the odor recognition assessment. The absence of the handler's scent on the target odor substance during the odor recognition assessment should cause the canine not to alert on the target odor substance.		

429	5.8.1.1.2 f) 5)	E	This needs a comma between "food" and "animal."	insert necessary comma	Accept.
143	5.8.1.2 g)		Delete - See the comment per 5.8.1.2 f)5) set forth above.		Reject: Section is needed.
144	5.8.1.2 h)		See comment regarding 5.8.1.2 f)3) - In order to minimize cross-contamination of the target odor signature, each canine team shall have a clean set of containers. Please clarify whether the target or signature will be in a line-up with other distractors for 30 minutes prior to a canine team running the odor recognition assessment; or whether the box with the target odor substance will be in place for 30 minutes prior to a canine team working the odor assessment.		Reject: recommended resolution is unclear and the consensus body cannot make assumptions as to what the commenter is intending without the reasoning.
145	5.8.1.2 i)		Please change 2x to 3x.		Reject: no reason was given for 3x.
146	5.8.1.2 k)2)		Please clarify whether the two attempts are (i) The canine team fails the odor recognition assessment and is re-tested on a new odor recognition assessment and fails the re-test, or (ii) the canine team runs the first odor recognition assessment more than 2x during the first assessment.		Accept with modification. Sentence clarified to read: "2)the canine team fails to complete the assessment searching each sample container twice"
147	5.8.1.2 k)3)		See my comment set forth above on the defined term false alert.		Reject: The consensus body cannot make assumptions on what comment is being referred to.
383	5.8.1.2.1	T	Operational assessments	Way too involved yet lacking clarity? Lacking defined frequency? Is it all of the different odors and all environments for every assessment? Or spaced over time? Everything has shall...open to lots of interpretation. If 90% that means minimum 10 hides allowing one miss? Again, setting standards that will result in training to a test rather than training for operational ability. Not reasonable for the small organization (whether volunteer or police). Worth noting that the vast majority of HRD teams are volunteer by necessity. Unless in large police departments, there is not sufficient need or benefit to warrant the expense. Setting all of this as "standard" with shall language as written is geared toward the large department with large budgets. All of this is literally a gift for defense, plaintiff attorneys, "expert" defense witnesses, and trainers looking to create "need" for their services. Even if police K9s working HRD, there are large numbers of very small departments that cannot meet these arduous and involved "shall" requirements that, in reality, do not reflect operational work. Can you please just write a testing "standard" and make the protocols for training best practices "guidelines?"	Reject: Per guideline for ASB documents, Standards have a majority of "shall" statements. Additionally the consensus body and ASB Board approved this document to be published as a Standard.
313	5.8.1.2.1	T	This language is the same as that used for odor recognition assessments. Some differentiation between the two would help clarity.	In sub-paragraphs (b) and (c), change "systematic search" to "systematic search in an operational environment." In sub-paragraph (d), change "searching" to "searching in an operational environment."	Reject: the lead-in sentence defines that this section is referring to searches in the Operational environment.
314	5.8.1.2.1	E	Updated terminology has not been added.	In subparagraphs (e) and (f), change "final response" to "trained final response".	Accept.
148	5.8.1.2.2		The second sentence should be changed as follows: Once the handler calls the location of the target odor substance (or an elevated target substance, the location of the strongest plume of odor), the certifying official/assessor shall immediately tell the handler whether to reward their canine.		Reject: It is not appropriate to make this a requirement, it is appropriate for this document to be a "may" statement.

315	5.8.1.2.7	T	Natural distractors may be present in the search area, but artificial distractors should still be used. It is good to have distractors that have been in the environment for roughly the same amount of time as the target odor to ensure that the canine isn't just hitting on something that is out of place in the environment. Natural distractors can't help with that. Also, I think an animal remains distraction should be mandatory.	Revise paragraph to require that X number of artificial distractors be placed.	Reject with modification: there is no limitation to add additional distractors beyond the naturally occurring ones. Recommendation for animal distractors added, but not required.
149	5.8.1.2.7		See my comment per section 5.8.1.2 f)5 set forth above.		Reject: The consensus body cannot make assumptions on what comment is being referred to. If it is regarding the pre-determined list of distractors, the suggested distractors are not limited by the current examples, no need to limit potential distractors.
150	5.8.1.2.8		Please revise the definition as follows: The target odor substance or distractor shall be concealed to mitigate visual cues that disclose the location of the target odor substance or distractor.		Reject: The proposed change does not add any value to the section as proposed.
316	5.8.1.2.9	E	Updated terminology has not been added.	change "alert" to "trained final response".	Accept with modification: both occurrences of "alert" modified to "final response"
151	5.8.1.2.9		The ASB Standard 076 should have a table that sets forth the following:		Reject: The referenced ANSI/ASB Standard 088 provides how to calculate the rates.
153		a) The number of misses (excluding any false responses called by the canine handler) that a canine team can have and pass the certification with the following assumptions (i) the minimum number of target odor substances used in the operational assessment (I believe the required sources are one source within the wilderness search area and one buried source for a total of two sources with the assumption that the two selected additional assessments are zero; I believe there are no required target odor substances within those areas), and (ii) the maximum number of target odor substances for the operational assessment and or two of the additional required assessments (it appears the total would be eight).			
155		b) A computation assuming one false response that is called by the canine handler and no misses of target odor substances for the following assumptions: (i) the minimum number of target odor substances used in the operational assessment; and (ii) the maximum number of target odor substances for the operational assessment and or two of the additional required assessments.			
272	5.8.1.2.9	T	If the maximum number of targets for the entire test are 14, 90% of 14 is 12.6. Does this mean the team the team must find 13 (92%) or 12 (85%) to pass? A false requirement of 10%, in this example would be 1.4 targets. For the minimum number of targets for the entire test is 3 which means they need to find 2.7 targets and not false alert on .3 sources.	Having a range of 3-14 potential sources in the whole testing sequence is too broad. Any number below 8 target sources will require the team to actually be 100% accurate. We combine the total finds and false alerts, with a 80% pass rate using this formula: # correct finds/ (total number of sources + total number of false alerts)	Reject: This is the assessment section, not certification. This pass/fail criteria is for each individual assessment with the required number of target odors defined within each assessment requirement.
156	5.8.1.2.10 d)		How will the certifying official/assessor know whether this occurred in the additional required assessment when they are conducted n a double-blind assessment basis?		Reject: This section addresses single-blind assessments, it is already common practice to clean up dog excrement.
158			It is virtually impossible to stop a high-rank drive detection dog from urinating in an area when they follow another canine that has urinated or defecated within a search area. The canine team that urinates and/or defecates shall be required to bag the excrement and remove it from the search area and/or dilute urination with water.		
159	5.8.1.2.10 e)		Please revise the definition as follows: e) The certifying official/assessor can stop a canine team if they are no longer searching effectively or exercise their judgment to stop the canine team when they reasonably believe the canine is suffering heat exhaustion.		Accept with modification: NOTE added to allow the assessor to suspend the search in the case of medical emergencies.
317	5.8.1.2.10	E	Updated terminology has not been added.	change "alert" to "trained final response".	Accept.

384	5.8.1.2.10 b	T	What is the "specified search time? Who determines?	Recommend clarification	Reject: Each individual assessment requirements outline the specified search times.
385	5.8.1.2.10 d	T	re "aggression towards a placed training aid(s) (intrusive contact, bite, and/or dig)." In real searches where odor has extensive set times and odor has spread, a dog will often (and needs to) scratch surface to confirm odor is not just cast off on surface.	Recommend change of wording re dig: "The dog may not pick up, eat, or otherwise be destructive toward the source such that handler and/or evaluator correction or intervention is required."	Reject with modification: "aggression towards a placed training aid(s)..." revised to "disruption of a placed training aid(s)..."
430	5.8.1.2.10 d)	E	This section uses an accurate conversion showing "6ft (1.82m)" but in other locations including 5.8.1.2.12.1 j) and 5.8.1.2.12.3 e) and 5.8.1.2.12.4 e) the more approximate conversion is used and the text reads "6 ft (2m)". I don't care which way you go, but I'd recommend going with one or the other. Similarly after 6.7 there is "3ft (1m)" where the more accurate would be 0.91m. Again, either one is ok, just pick accurate or approximate. This issue is also in Appendix A.	Pick one and be consistent	Accept: All revised.
160	5.8.1.2.11		It isn't practical to design a certification or operational assessment that is representative of the canine's representative environment. The certification/assessment should be designed to evaluate whether (i) the canine recognizes the target odor signature, (ii) can the handler read the canine, and (iii) the canine team understands the underlying detection risk and effectively defeats those detection risks.		Reject: It is practical to design a certification or operational assessment that is representative of the canine's representative environment. Additionally, this section is for assessments, not certification.
161	5.8.1.2.12.1		Please revise the section as follows: The wilderness operational assessment is designed to evaluate the canine team's ability (i) to locate the target odor signature of human remains, if any, (ii) to assess whether the handler read their canine, and (iii) assess the canine team's understanding of the detection risk and effectively defeats those detection risks.		Reject: The suggested recommendations are covered in the prior sections, 5.1 through 5.7.
162	5.8.1.2.12.1 a)		Please revise the sentence as follows: There shall be three distinct areas that will be searched by the canine team.		Reject: no reason was given for this recommended change.
164			If the goal is to standardize canine team certifications and/or assessments, then there should be a set number of areas to be evaluated.		
165	5.8.1.2.12.1 d)		To save time and facilitate the certification/assessment, please delete printed maps.		Reject: this section is not requiring only printed maps, it is one of the options.
166	5.8.1.2.12.1 h)		Please revise the sentence as follows: The number of target odor substances, if any, per area shall be determined by the accredited certifying official/assessor.		Reject: This is the assessment section, not certification.
167	5.8.1.2.12.1 i)		Please revise the sentence as follows: If an individual area contains two (2) target odor substances, then each target odor substance shall be separated by a minimum of 100 feet. Smear/trace amounts of target odor substances shall not be used in a wilderness area.		Reject: No reason was provided for 100 ft vs the 20 ft currently in the document. Additionally smear/trace amounts can be used in a wilderness assessment, section 6 defines that they cannot be used in a certification. It is not possible to put a maximum without limiting the composite samples.
169			Note: The minimum target odor substance for a wilderness assessment shall be not less than three pounds and not more than five pounds with a minimum surface area of at least three inches per target odor substance. The target odor substance(s) shall be on the surface or elevated but not buried below the ground surface.		
170	5.8.1.2.12.1 j)		Please revise this sentence as follows: There shall be no more than one elevated target odor substance in a wilderness area.		Reject: A fixation could be created with excessive similar scenarios in training, however due to the limited instances in assessments, it is not a concern.
172			Note: Too many elevated hides can quickly create a fixation by a canine, and when coupled with high wind speed, an odor plume can quickly cross-contaminate a large area. This fixation on elevated target odor substances can adversely impact the canine's ability to locate a buried target odor substance.		
173	5.8.1.2.12.1 k)		Please establish a maximum set time.		Reject: no reason was given for this recommended change.

174	5.8.1.2.12.1 l)		Please revise the prescribed certification/assessment search time to the following: The wilderness assessment search time shall be determined by the accredited certifying official/assessor per individual search area. The certifying official/assessor shall consider but not be limited to (i) the target odor substance stage of decomposition, (ii) the amount and surface area of the target odor substance(s), (iii) the packaging of the target odor substance, (iv) the terrain, (v) weather conditions, (vi) the extent of vertical surfaces and underbrush within the area, and (vii) the extent of tree cover within a given area. The certifying official/assessor may extend the initial search time if the canine team is working effectively to clear the area.		Reject: This is the assessment section, not certification.
265	5.8.1.2.12.1	E	minimum 20'	sources should be placed a minimum of 40 or 50 feet apart 20 feet causes a likelihood for odor crossover as it is quite close. More space should be given so that it is a reasonable and fair assessment.	Reject with modification. There is no scientific basis to indicate 40 or 50 feet being better than 20 feet. Distance revised to 33 feet. If such literature becomes available, the standard can be revised.
266	5.8.1.2.12.1	E	6' maximum for elevated	4' maximum for elevated; hides as high as 6' can reduce odor availability to the canine	Reject. There is no scientific basis to indicate a maximum of 4 feet being better than a maximum of 6 feet. If such literature becomes available, the standard can be revised.
349	5.8.1.2.12.1	T	A 1-acre area is not Wilderness. Call it something else, but it is not Wilderness. This test does not prepare a handler and K9 for a large area search that includes a combination of navigation, search strategy, safety considerations, and fitness. Please consider changing the name and adding a true Wilderness component for those handlers that regularly do this type of real search in remote areas of the country.		Reject: Wilderness is a descriptor of the environment of the area the team is searching in, not a descriptor of the size of the search area. Additionally since the assessment shall include a minimum of three individual search areas, the minimum total assessment is three acres.
386	5.8.1.2.12.1 j	T	Distance between target odors should be larger	6m in a 1-2 acre area is way too close together. Especially if one source is 6' high and another is within 6 m.	Reject. There is no scientific basis to indicate a larger area is necessary. If such literature becomes available, the standard can be revised.
351	5.8.1.2.12.2	T	Buried - burial depth of 6" to 24" is a big range for a testing standard.		Reject. No actionable resolution was provided for a different range.
175	5.8.1.2.12.2		Please revise the section as follows: The buried certification/operational assessment is designed to evaluate the canine team's ability to locate the odor signature emitted from a buried target odor substance within a search area.		Reject. Certification is in section 6. This section is only for the operational assessments. The term "human remains" is a sufficient descriptor for this section.
273	5.8.1.2.12.2	T	waiting 6 hours for a buried source to site really makes testing difficult, practical problem with putting on a test. We find letting a hole sit for only 30 minutes is fine for most soil types that are only 6"- 12" deep.	Please adjust depth of hole requirements to 6-12" and age only 30 minutes.	Reject. There is no scientific basis to indicate a depth of 6-12" and 30 minutes being better than a depth of 6-24" and 6 hours. If such literature becomes available, the standard can be revised.
176	5.8.1.2.12.2 a)		Please revise the section s follows: The assessment shall include two search areas.		Reject. No actionable reason was provided for the recommended modification.
177	5.8.1.2.12.2 b)		Please change the last sentence to the following: The search area shall be one (1) acre or 43,560 feet (4,046 m).		Reject. The 1 acre is a minimum.
178	5.8.1.2.12.2 b)		To save time and facilitate the certification/assessment, please delete printed maps.		Reject: this section is not requiring only printed maps, it is one of the options.
179	5.8.1.2.12.2 e)		Please revise this sentence as follows: A minimum of one area shall contain one target odor substance. The target odor substance shall be comprised of tissue and fluid.		Reject. This section does not explain the types of odor substances to be used.
180	5.8.1.2.12.2 f)		Please revise the sentence as follows: The remaining buried area shall have zero (0) or one (1) buried target odor substance.		Accept with modification. "individual search" revised to "buried".

181	5.8.1.2.12.2 g)		Please revise the sentence as follows: The number of buried target odor substances per 5.8.1.2.12.2 f) shall be determined by an accredited certifying official/assessor. The certifying official/assessor shall consider but not be limited to (i) the target odor substance stage of decomposition, (ii) the amount and surface area of the target odor substance(s), (iii) the packaging of the target odor substance(s), (iv) the soil type and depth of the buried target odor substance(s) within the designated search area, (v) the terrain and weather conditions, (vi) the extent of vertical surfaces and underbrush within the area, (vii) and the extent of tree cover within a given area.		Reject. The recommended modification is overly specific for this assessment.
182	5.8.1.2.12.2 h)		Please revise the sentence as follows: The target odor substance(s) shall be covered by a minimum of 6 in. (15.25 cm) and a maximum of 24 in. (25.4 cm) of soil. The accredited certifying official/assessor shall determine the set time based on the factors set forth in 5.8.1.2.12.2 g). Generally, the set time will be longer the greater the depth the odor substance is buried, how fine the soil particles are in the search area, and the extent the target odor substance(s) is decomposed.		Reject. There is no scientific basis for the recommended text. If such literature becomes available, the standard can be revised.
183	5.8.1.2.12.2 i)		The number of false holes per individual search area shall be five, and they shall be a minimum of 25 feet radius from a buried target odor substance(s).		Reject. No actionable reason was provided for the recommended modification.
184	5.8.1.2.12.2 j)		Please delete and renumber the section accordingly.		Reject. No actionable reason was provided for the recommended modification.
185	5.8.1.2.12.2 k)		Please revise the wording as follows: The buried certification/assessment search time shall be determined by the accredited certifying official/assessor per individual search area. The certifying official/assessor shall consider but not be limited to (i) the target odor substance stage of decomposition, (ii) the amount and surface area of the target odor substance(s), (iii) the packaging of the target odor substance, (iv) the depth, (v) the terrain, (vi) weather conditions, (vii) the extent of vertical surfaces and underbrush within the area, and (viii) the extent of tree cover within a given area. The certifying official/assessor may extend the initial search time if the canine team is working effectively to clear the area.		Reject. The recommended modification is overly specific for this assessment.
187			The additional required assessments from which the certifying official/assessor shall select two or more areas shall be selected is, in my opinion, fundamentally flawed. A canine team could be certified in urban exteriors, interior buildings/structures, vehicles, and light debris piles without being required to locate the odor signature of a target substance within a search area. That is an unsound approach and inconsistent with this Standard's stated object to (i) evaluate the canine team's ability to locate the odor signature emitted from a target odor substance in different search environments, and (ii) evaluate the canine's ability to recognize the decomposition spectrum.		
188	5.8.1.2.12.3		Please revise the section as follows: The urban exterior operational certification/assessment is designed to evaluate the canine team's ability to locate the odor signature of the target odor substance of human remains on a building's exterior. Potential urban exterior operational certifications/assessment areas shall be consistent with the operational requirements of the canine team. The building exterior certification/assessment consists of the following:		Reject. Certification is in section 6. This section is only for the operational assessments. The term "human remains" is a sufficient descriptor for this section.
190			a) The assessment shall be one (1) search area.		Reject: no reason was given for this recommended change.
192			b) The search area shall approximate 750 ft2 (69.8 m2) and be no longer than 1,500 ft2 (139.6 m2).		Reject: no reason was given for this recommended change.

194			c) The number of target odor substances shall be two (2), and the target odor substances shall be placed based on the judgment of the accredited certifying official/assessor.		Reject: no reason was given for this recommended change.
196			d) The amount of the target odor substance shall be determined by the accredited certifying official/assessor but shall not be less than [insert prescribed amount and age of decomposition].		Reject: no reason was given for this recommended change.
198			e) The target odor substances shall be placed anywhere from ground level to 3 ft (2 m) high;		Reject: no reason was given for this recommended change.
200			f) The target odor substances shall be placed a minimum of 30 minutes before the certification/assessment begins.		Reject: no reason was given for this recommended change.
202			g) The accredited certifying official shall determine the amount of time to conduct the search and may stop a canine team when they are no longer searching effectively.		Reject. This is the assessment portion of the document, not certification.
204			Note: Alleyways, sidewalks, streets, and other city environments have a high risk of being contaminated with the target odor substance (e.g., blood...etc.) and should not be used as certification/assessment areas.		Reject. This is the assessment portion an the document, not certification. Additionally, "should" statements can not be in NOTES.
205	5.8.1.2.12.4		Please revise the section as follows: An interior building/structure certification/assessments are designed to evaluate a canine team's ability to locate the target odor signature emitted from a human remains substance within an interior building/room. The interior building/structure certification/assessment consists of the following components and parameters:		Reject. Certification is in section 6. This section is only for the operational assessments. The term "human remains" is a sufficient descriptor for this section.
206	5.8.1.2.12.4 c)		Please revise the section as follows: The number of target odor substances is two (2) and shall be placed based on the judgment of the accredited certifying official/assessor.		Reject: no reason was given for this recommended change.
207	5.8.1.2.12.4 d)		Please delete and renumber the section accordingly.		Reject: no reason was given for this recommended change.
208	5.8.1.2.12.4 d)		The amount of the target odor substance shall be determined by the accredited certifying official/assessor but shall not be less than [insert prescribed amount and age of decomposition].		Reject: This is the assessment section of the document, not certification. It is not possible to consistently know the age of decomposition of the substance, based on the environment and how it was stored.
209			Generally, the Additional Required Assessments should contain two target odor substances with one less than three months decomposition and the other three months or more decomposition.		
210			Generally, the Additional Required Assessments should contain two target odor substances with one less than three months decomposition and the other three months or more decomposition. This would increase the spectrum of target odor substances and require the canine team to demonstrate their proficiency by locating the odor signature in these environments.		
211	5.8.1.2.12.4 e)		One target odor substance may be placed anywhere from ground level to 6 ft (2 m) high. One target odor substance shall be concealed within the building and shall be ground level to no more than three feet from the floor.		Reject: no reason was given for this recommended change.
212	5.8.1.2.12.4 f)		The target odor substances shall be placed a minimum of 30 minutes before the certification/assessment begins.		Reject: this is not the certification section of the document.
213	5.8.1.2.12.4 g)		The accredited certifying official shall determine the amount of time to conduct the search and may stop a canine team when they are no longer searching effectively.		Reject. This is addressed in section 5.1.1.2
389	5.8.1.2.12.3 and .4 and .5	T	Only 1 area each yet can be 0-2 sources which means 0 in each could mean no actual test of the dog's ability to find odor in either of these environments.		Reject. Since this section is for assessments, not certification, the search area can be blank.
318	5.8.1.2.12.2 (i)	E	Missing a word after "(3)"; probably should be "false holes".	Add missing word	Accept.
6	5.8.1.2.12.2	I	3 is to many	1-3 falseholes depending on terrain	Reject: no reason was given for this recommended change.

319	5.8.1.2.12.2	T	I would consider adding a requirement for a buried animal remains distraction. We don't want LE spending money to dig up a patio only to find a dead dog.	Add a sub-paragraph that requires that a buried animal remains distraction be placed a minimum of 100 feet away from target odor location, at approximately the same time they bury the target odor. The depth range should be the same as that used for the target odor.	Accept with modification: animal remains recommendation added to section 5.8.1.2.7, including the option for it to be buried.
387	5.8.1.2.12.2h	T	6" to 24" burial is too broad of a range	Recommend smaller burial range - perhaps 8" - 12" and specify to the top of the source odor container (in other words, not a 12" hole with a 8" tall container - 4" to top of container)	Reject: The section states that the training aid(s) shall be covered, which indicates that the soil is on top of the training aid. At this time there is no scientific basis for a smaller burial range, if additional research becomes available, the document can be modified.
388	5.8.1.2.12.2j	T	2 hour set time should be sufficient	Specify that areas should not be used by multiple dogs for testing?	Reject. There is no scientific basis to indicate a 2 hours set time being better than a 6 hour set time. If such literature becomes available, the standard can be revised. In ideal circumstances, a search area would not be used by multiple dogs, however, the consensus body recognizes that this is not always possible.
335	5.8.1.2.12.2.i	T	"shall be a minimum of three (3)" what? Per search area - sources or false holes?		Accept. Fixed, missing words "false holes" added back.
320	5.8.1.2.12.3	T	If only 1 search area is used, it doesn't really make sense to allow the placement of zero training aids.	In subparagraph (c), add a clarification that a search area can be blank only if at least one other search area has a training aid.	Reject. Since this section is for assessments, not certification, the search area can be blank.
321	5.8.1.2.12.4	T	If only 1 search area is used, it doesn't really make sense to allow the placement of zero training aids.	In subparagraph (c), add a clarification that a search area can be blank only if at least one other search area has a training aid.	Reject. Since this section is for assessments, not certification, the search area can be blank.
338	5.8.1.2.12.4	T	same as above - should be singular		Accept with modification. "An interior building" modified to "interior building"
322	5.8.1.2.12.5	T	If only 1 search area is used, it doesn't really make sense to allow the placement of zero training aids.	In subparagraph (c), add a clarification that a search area can be blank only if at least one other search area has a training aid.	Reject. Since this section is for assessments, not certification, the search area can be blank.
336	5.8.1.2.12.5.1	T	Drop the "s" in area		Accept with modification. Modified to "area(s)" since it is a "minimum of one"
337	5.8.1.2.12.5	T	a light debris...operational assessment is (drop the s on assessment and change are to is)		Accept with modification. "A light debris" modified to "Light debris"
214	5.8.1.2.12.5		Please revise the introduction as follows: A light debris (e.g., organic debris such as downed trees or brush and shall exclude trash) operational assessment is designed to evaluate the canine team's ability to locate the odor signature that is emitted from a target substance within this environment.		Reject: no reason was given for this recommended change.
216			Note: Trash piles could include household garbage and should never be used for certification.		Reject. This is the assessment portion of the document, not certification. Additionally, "should" statements can not be in NOTES.
218			Please revise the requirements as follows:		
220			a) The assessment shall be one search area that is approximately 150 feet in length.		Reject: no reason was given for this recommended change.
222			b) The number of target odor substances shall be two (2), and the target odor substances shall be placed based on the judgment of the accredited certifying official/assessor.		Reject: no reason was given for this recommended change.
224			c) The amount of the target odor substance shall be determined by the accredited certifying official/assessor the amounts [insert prescribed amount and age of decomposition but shall not be a smear/trace].		Reject: no reason was given for this recommended change.
226			c) The target odor substances substance may be placed anywhere from the ground level with consideration to the safety of the certifying official/assessor and canine teams.		Reject: no reason was given for this recommended change.

228			d) The target odor substances shall be placed a minimum of 30 minutes before the certification/assessment begins.		Reject: no reason was given for this recommended change.
230			e) The target odor substance shall be concealed from view of the canine team.		Reject. This is addressed in section 5.8.1.2.8.
232			f) The accredited certifying official shall determine the amount of time to conduct the search and may stop a canine team when they are no longer searching effectively.		Reject. This is addressed in section 5.1.1.2
267	5.8.1.2.12.5	E	[no text]	does not specify distance between 2 odors; this metric should be added to maintain consistency with other guidelines.	Accept.
323	5.8.1.2.12.6 (d)	E	Editorial clarification needed	Change "Only" to "No more than"	Accept.
324	5.8.1.2.12.6	T	Section is missing a requirement for the minimum number of training aids to be placed.	Add a requirement that at least one training must be used.	Reject. The assessment could be run completely blank.
339	5.8.1.2.12.6	T	10 vehicles way too many - go with 5 vehicles and two sources 1 in 1 out		Reject. Motor vehicle assessments are not required. In order to reach statistical significance, a minimum of 10 vehicles is needed. This has been discussed by the consensus body and this has been agreed upon.
7	5.8.1.2.12.6	A	Logistical nightmare with little or no different outcome with 3 vehicles	3 vehicles one hot	Reject. Motor vehicle assessments are not required. In order to reach statistical significance, a minimum of 10 vehicles is needed. This has been discussed by the consensus body and this has been agreed upon.
233	5.8.1.2.12.6		Please revise this section as follows: The vehicle operational assessment is designed to evaluate the canine team's ability to locate the odor signature emitted from a target substance concealed on the exterior or interior of a vehicle. The canine team shall conduct the search in accordance with their organization's requirements (i.e., the organization's requirement is that only the exterior of the vehicles are sniffed with the window(s)/door(s)/or other-opening(s) closed and/or a specified number of passes around the vehicle).		<p>Reject with modification: There is no need to add types/amounts/weights of the target odors does not need to be added here, it is contained in 5.5 and 5.6.</p> <p>Pass/fail criteria is included in 5.8.1.2.9 and 5.8.1.2.10.</p> <p>Additionally no reason was given for these recommended changes.</p> <p>Minor text changes were made to clarify the section.</p>
235			a) The certification/assessment shall include a minimum of five (5) vehicles and shall not exceed seven (7) vehicles when only exteriors are to be sniffed.		
237			b) The number of target odor substances shall be two (2), and the target odor substances shall be placed in accordance with the canine team's mission. The concealment location shall be based on the judgment of the accredited certifying official/assessor.		
239			c) The target odor substances shall be placed a minimum of 30 minutes before the certification/assessment begins.		
241			d) The amount of the target odor substance shall be determined by the accredited certifying official/assessor and the amounts [insert prescribed amount and age of decomposition].		
243			e) The parking area shall be consistent with the number of vehicles to be sniffed or larger, with ample room between each vehicle to allow the canine team to move around each vehicle.		
245			f) The accredited certifying official shall determine the amount of time to conduct the search and may stop a canine team when they are no longer searching effectively.		
352	5.8.1.2.12.6	T	Vehicles - 10 vehicles are very very difficult to obtain for a testing event if you can't use junk yards! That means you need 10 friends willing to leave their cars for you for a day! Used car lots, maybe?		

390	5.8.1.2.1.12.6	T	Vehicles: Clarify that the dog may only search the exterior of the vehicle. Recommend strongly against allowing dog into interior of vehicles. HR searches are for trace evidence not for contraband. Trace evidence including touch dna, hairs, fibers, fingerprints. Putting a dog into a car will destroy most of that as potential evidence. Also, recent case law re dogs sticking their heads into windows, jumping onto car. It also brings into questions if the dogs are searching cars prior to evidence teams or after. If after, the defense can articulate that the team cross contaminated. Just a big potential for contention. Best to keep HR dogs out of the cars. Larger vehicles/busses, boats, RVs may be a different consideration even though looking for the same trace forensic evidence. Let the ERT process the vehicles interior and keep the dogs outside.	Remove interior search for HR dog completely.	Reject: please see item i) in this section. The test should be completed in accordance with their organization's requirements.
415	5.8.2	E	The safety note seems out of place at the very start of this assessment section, especially given that was not the case for other assessments.	Relocate this statement to a later subsection or remove it.	Accept.
246	5.8.2		Please revise this section as follows: The assessments in this section are intended to be conducted single-blind, and at least one area from the urban exterior, light debris, building interior, or vehicles shall be conducted on a modified double-blind basis.		Reject: This section provides the components and parameters of conducting a double-blind assessment. All assessments described in 5.8.1 can be conducted double-blind.
248		Revise the sentence to the following: When a modified double-blind assessment is conducted, it shall be conducted with considerations for safety.			
250		Note: See earlier discussion regarding the advantages of modified double-blind versus double-blind testing and necessary research by scientists and accredited certifying officials/assessors.			
252		Modify the remainder of 5.8.2 to incorporate modified double-blind and deleted double-blind testing until further joint research by accredited certifying officials/assessors and scientific researchers is conducted that is statistically significant.			
347		E	This document has become very difficult to understand but if I see what you are saying I would be opposed to internal testing 4 times a year or at all. I would, also, like to see certifications lasting longer than one year due to the fact that some handlers have multiple K9's and would be testing multiple times a year. Some train multiple disciplines (water and land HRD). Finding evaluators has become an arduous task of late and having to do it several times a year becomes a true hardship. I am very unclear on the buried and the two smaller problems as to where they would fall - team assessments or individual certifications.		Reject. This is not the certification section, and no actionable resolution was provided for the consensus body to implement.
325	5.8.2.4	E	Updated terminology has not been added.	Change "final response" to "trained final response".	Accept.
416	5.8.2.5	E	Double-blind assessments every six-months is only given a "should" level statement/recommendation. This is essential to the reliability and legitimacy of the standard.	"The canine team shall be required to complete a double-blind assessment every six months.:"	Reject. This has been reviewed and discussed by the consensus body and the "should" statement was agreed upon.
340	5.8.2.6	E	What is proficiency testing not clear		Reject: Proficiency testing is defined in section 3 - Terms and Definitions.
417	5.8.2.6	E	Again, this should be a "shall" statement.	"A human remains detection double-blind assessment shall be used for proficiency testing every <i>[insert time frame]</i> ."	Reject. This has been reviewed and discussed by the consensus body and the "should" statement was agreed upon.
326	6	T	To obtain certification, the canine should be required to demonstrate odor recognition across the entire spectrum of human decomp (similar to what is done with narcotics and explosives). As the standards are written, it seems that the canine only has demonstrate recognition of one randomly chosen odor.	Expand the odor recognition assessment so that it mandates recognition of 5-10 different types of human remains representing the entire spectrum of decomp.	Accept with modification: Section 6.5 and Table 2 have been revised/added for clarification.

276	6.1	T	1 year valid certificate? Sorry this is not the industry standard. The three biggest SAR groups realize this is not needed. It is also impossible for volunteers and organizations to meet this need. The ASB was wrong to adopt this in the first place. Does a dog need to take this proposed 3.5 hours test 10 times in its career to prove they are efficient? A team meeting training requirements should not need to do this. This is a huge cost and time commitment and there must be an alternative.	Accept 2 year certifications for active meeting their other training requirements.	Reject: NAPWDA, USPCA, IPWDA, NNDDA, and other certification agencies all adhere to yearly certifications. This document is remaining in conformance with those agencies.
358	6.1	T	Given the rural nature of our area, testing opportunities are rare, so once a year for recert. Is not possible	Recert every two or three years, and provide documentation of ongoing training annually.	Reject: NAPWDA, USPCA, IPWDA, NNDDA, and other certification agencies all adhere to yearly certifications. This document is remaining in conformance with those agencies.
344	6.1	E	No idea what this means		Reject. No explanation of comment or proposed resolution.
253	6.2 and 6.4		Please change double-blind testing to modified double-blind testing.		Reject. "modified" double-blind testing is not a type of testing addressed in this document, so it is not an appropriate revision for the certification section.
341	6.3	T	is this saying one can be on the same team as another, but not "routinely involved in the training of the canine team"????		Reject: No resolution was provided. However, for clarification of the commentor, yes a person on the same team can certify they other team member as long as they are not be routinely involved in the training (maintenance training, periodic proficiency assessments, double-blind assessment, etc.) of the canine team being evaluated
268	6.4	T	A certified team should be able to work in wilderness (area), urban and debris environments. But the testing parameters as designed are too laborious a minimum of 215 minutes.	Combine urban exterior, interior, vehicle into one 20 minute assessment. These are all the same environment and does not make sense to break them apart, a car is just a big piece of metal, really the important thing is the contamination of urban not the objects or locations.	Reject. These require different skill-sets and different search grids.
269	6.4	T	The odor recognition assessment is completely redundant in this testing protocol. It might be good to weed out dogs that are not ready. But a dog that can pass the rest of these tests demonstrates odor recognition.	Change to a suggested pre-test before entering into testing sequence. Trying to reduce the amount of time for testing. SARDUS puts on 100 HRD tests a year and if each test is 3.5 hours this means testing will need to be spread out for multiple days. We find dogs searching for our max of 80 minutes are worn out, hot and their reliability starts to diminish.	Reject. The odor recognition test is a valuable tool to test handler and dog fundamental skills.
270	6.4	T	If you look at a testing sequence that includes wilderness, urban and disaster the wilderness portion does not have to be so complete, which on its own can have a dog searching for 90 minutes. There is nothing special about "wilderness" except it is not urban, less contaminated with natural features. Covering 1 acre also does not prove much about search strategy. An area with one source should be very simple and sources are covering each other.	Change "wilderness test" to "area test" and put in as one component of all the tests instead of stand-alone. A dog that can accurately find 0-3 sources in an area, debris field, and urban area as well as correctly determining a blank area is a well rounded HRD dog team. This test can be done in 80 minutes! A 215 minute test will greatly increase the costs, set up times, and hours taken to put on a test. This may make testing very expensive.	Reject. Each area presents its own distinct challenges.
271	6.4	T	Buried targets. Canines teams need to be as efficient in locating HRD that is buried, on the surface, under rubble and hanging. Instead of creating a test just for buried why not include it in the other testing locations. The teams need to be able to locate buried remains in area, debris, and/or urban areas.	Remove the specific buried test and include buried as a possibility in the other tests. Require that buried remains must be found, as well as surface, under debris and hanging in some portion of the testing sequence. By allowing a buried target to be placed in different testing areas you will remove 60 minutes of testing requirements with the same result.	Reject. This requires different skill-sets and a different search grid.
353	6.4	T	While the option to select 2 or more Additional Required Assessments is interesting, I don't understand how it would actually be implemented.		Accept with modification. No proposed resolution, Table 1 was revised to not require the additional assessments.
356	6.4	T	I like the Urban Exterior component.		Noted.

422	6.4	T	I don't agree with prescribed test areas	I think handler s/b able to select his/her four areas of testing based on their operational deployments. Odor recognition is the only necessary mandatory to determine readiness for certification	Reject with modification. The required assessments in this section are consistent with the required assessments in other national standards (NAPWDA, USPCA, IPWDA, NNDDA, etc.).
419	6.4	E	This is really difficult to follow - the table should be more descriptive so that we know what these assessments look like when we read this section and look at this table.	Add to the table and text so that an end-user knows what these assessments involve and look like/the goal of the assessments.	Reject. Table A.1 is a more detailed table for Assessments.
254	6.5		Modify the target odor substances as set forth in each respective area set forth above. Trace amounts of 0.01 lb should be prohibited to be utilized in wilderness areas. The focus should be on the weight of the target odor substance, the exposed surface area of the target substance, and its packaging.		Accept. The minimum was revised to 0.03 lb (15 g).
255	6.5.1		If the mission of the canine organization is to not train on blood or teeth by themselves, then they should not be used for certification or an operational assessment.		Accept with modification. The training aids have been modified and put into Table 2.
1	6.5.1	A	The presence of human blood does not necessarily indicate "dead". Blood should only be required IF it is deemed needed by the agency the teams work for. Fresh and old blood is found in homes, schools, playgrounds, etc all over America. It is in many cases HIGHLY unproductive. This should not be REQUIRED as a source for the certification for all dogs. It should be used only if the team testing utilizes dogs for locating blood in their deployments.	insert blood optional dependent upon agency needs	Accept with modification. The training aids have been modified and put into Table 2.
256	6.5.2		How and who will make this assessment of the target odor substances to be used for certifications/assessments? What will be the criteria for the evaluation?		Reject. No actionable resolution. Adherence to the standard training aid storage, qualifications of evaluators, or certifiers ensures the use of only quality training aids.
257	6.5.4		Given the difficulty in obtaining target odor substances, the requirements are not practical at this time.		Accept with modification. The training aids have been modified and put into Table 2.
258	6.6		Delete double-blind and insert modified-double blind.		Reject: "modified double-blind method" is not addressed in this document. The "modified double-blind method" that is recommended here is a double-blind.
259	6.6 c)		See above regarding the request to include computations based on the minimum and the maximum number of target odor substances to be used in the certification/assessment in an exhibit to this certification.		Reject: There is no 6.6 c), there is a 6.7 c) but the comment does not give enough information regarding what the commenter is referring to. If the commenter is referring to the percentages in 6.7 c), the calculation cannot be given, as the numbers in 6.7 are minimums, so the test may be different.
342	6.6	T	should be in the chart		Reject. 6.6 is a recommendation not a requirement, so it is not appropriate for it to be in the chart.
418	6.6	E	Again, this should be a "shall" statement.	"At least one certification component shall be a double-blind assessment. Certification components that are not double-blind shall be single-blind assessments."	Reject. Sometimes double-blinds are not possible.
343	6.7	E	if this is saying the buried should be in the pretest, this is way over the top. Buried should only be in the certification.		Reject. The Odor recognition test is the only pretest.
260	6.7		If the certification/assessment is conducted on a double-blind basis instead of using a modified double-blind basis, the certifying official/assessor will not know what specific environmental conditions were when the canine team conducted the sniff.		Reject: "modified double-blind method" is not addressed in this document. The "modified double-blind method" that is recommended here is a double-blind.
274	6.7	T	alert must be within 3' of source. This is an arbitrary number. Many conditions exist that would make this impossible. Think of source blowing through a car and the dog alerting on the other side... happens all the time in testing as winds change throughout the day. A source 6' up may be impossible to get within 3' of for the dog.	Wording really needs to be beyond "extenuating conditions" the dog must pin-point scent to the closest degree possible.	Accept with modification, the term "extenuating" has been removed.

261	6.8 et al		When the certification/assessment is conducted on a double-blind basis instead of using a modified double-blind basis, the certifying official/assessor will not know the canine handler errors, breaches of safety, nor whether the canine is in immediate danger of heat stroke, nor a) through d).		Reject: "modified double-blide method" is not addressed in this document. The "modified double-blind method" that is recommended here is a double-blind.
391	6.8	T	Allowing the dog outside of the search area	This needs to be at the discretion of the evaluator...based on environmental conditions, a dog needs to go outside to obtain odor path to target source.	Accept with modification. "unless the canine is actively following target odor into the assigned search area." added to the end of b).
275	6.8 b	T	allowing the canine outside the search area is a fail?	this may be needed to search the area itself. If the dog is in control of the handler then this is not an issue. Remove allowing canine outside of search area as an acceptable failure point.	Accept with modification. "unless the canine is actively following target odor into the assigned search area." added to the end of b).
392	6.8.d	T	re no digging	Recommend change of wording re dig: "The dog may not pick up, eat, or otherwise be destructive toward the source such that handler and/or evaluator correction or intervention is required."	Accept with modification. "intrusive" modified to "destructive"
262	6.9		See comments set forth in 3.52.		There is no way that the CB can interpret this comment and come up with a resolution.
346	6.11	E	No on the action plan		Reject. No resolution was provided. Also if the canine fails the certification, there shall be a document plan for the next attempt.
345	6.12	e	should be in training logs and nothing more		Reject. Not all remediation plans involove training logs.
263	7.2		Change shall to may in the first sentence.		Reject. The purpose of maintenance training is to conduct the regular objective-oriented training.
393	7.2	T	Re "a drop" of blood. This is not an operational target amount. Training to this low of a threshold will lead to red herring indications at every sink/drain, bathroom. Blood is not contraband. It occurs frequently in every day life. Very problematic and if there is a target location that has a drop of blood, let luminol find it.	Select a more operational functional blood quantity.	Accept with modification. L) was moved out of the "shall" list to it's own paragraph.
264	8.1		Please revise the statement "every effort shall be made to train on actual human remains" to the following: Reasonable effort shall be made to train on the odor signature emitted from human remains substances.		Reject. Actual human remains are the only reliable source of human remains odor at this time.
2	8.1		For the United States NO use of anything but real human remains should be allowed. No exceptions made. If you cannot train on the real thing, do something else with your dog.	Remove "Every effort shall be made to train on actual human remains. NOTE Where feasible avoid use of alternative training aids (pseudos, simulants, and surrogates)."	Reject with modification. Second sentence added to clarify "every effort". Note revised to remove items in parentheses.
394	8.2.1	T	Option of label to have identifying number/code that tracks to information. Also, how, based on this "shall" does one label a "drop of blood" or "smear?"	Specify that labeling described is for storage and transport/it can't be for actual field placement during training.	Reject with modification. "containers" added to sentence for clarification. A drop of blood or smear would not be placed in a container, so this comment does not apply to this section.

395	9.7	T	Re "Training records maintained by the canine handler's organization shall include, but not limited to the following data"	Recommend removing requirement for "Organization" to maintain training records. Aside from being overly cumbersome as written, it opens the door for inconsistency between handler's record and organization's record. Both would be discoverable. There should be only one training record and that is documented by the Handler. This comment/recommendation applies to any section in which there is a recommendation or "shall" stating that an organization maintains the same record as the handler. Too much room for error and discrepancy between what the handler documents and what the organization documents. In addition, at any given training, there may not always be a "supervisory" training member or team member to be documenting everyone's training for that session. This would result in gaps in these training logs. Recommend that an organization can have an overhead description of training with "attendance" and/or that the handler records are provided to the organization on a monthly or quarterly basis? And again, this document and "shalls" assumes are large organization overhead. Not applicable throughout most of the country.	Accept with Modification. Lead-in sentences to 9.5, 9.6, 9.7, and 9.8 made consistent for clarity.
396	9.10	T	Re 9.10 Confirmed operational outcomes can be used as a factor in determining canine team's capability.	This is outside the scope of a standard. It is up to the court and legal precedent to determine what can be used as a factor to determine.	Reject. This is neither a recommendations (should) or a requirement (shall), as a "can" statement it is permissible.
397	9.11	T	Re Unconfirmed operational outcomes shall not be used as a factor in determining a canine team's proficiency. Unconfirmed operational outcome, including a non-productive response, may be relevant for investigative/testimony purposes because of the following:	Again, this is information which is outside the scope of a standard.	Reject. This section provides context for calculating proficiency.
398	9.12	T	There is no definition of a supervisor. In the volunteer world/which again is the vast majority of HRD handlers, there is no "supervisor".	Recommend delete or change to "Organization" review.	Reject. This is a "should" statement, as the handler may be the supervisor.
399	9.15	T	Shouldn't record retention be dictated by Court precedent? How can this be an undefined "shall?"	Either establish a recommendation for record retention or leave it out. I was recently call for a 25 yr old + case.	Accept. Added "at a minimum, for the life of the canine"
400	9.16	T	Re 9.16 Training records shall illustrate the type and amount of training that the team has experienced before and after certification.	This is redundant. Training records are maintained throughout the working life of the dog.	Reject. This section is a CB agreed upon summarization for this section.
401	9.17	T	Re training aids	This section is redundant to the section above. Recommend removal of this section.	Reject. This section is specifically for Training Aids, and is therefore not redundant.
450	9.5 table-2 notes sections	T	avoid drawing into tubes containing an anticoagulant	avoid using blood collection tubes with anticoagulant or preservatives Suggest using a red top or sterile tube with no additive; other tubes will have anticoagulant or preservatives like sodium fluoride	Reject with modification. Sentence deleted, no published research at this time.
440	Table 2	E	Add periods to all statements, or at least consistently	Add periods	Accept.
441	Table 2, note	E	note reads strangely	* best practice - do not reuse jars, use double containment, and check the integrity of lids.	Accept. Revised to a list.
431	Table 2. Page 28	E	Table line with "Cremated remains," last column uses the word "accelerate" where I think you mean "accelerant." However, most cremations use natural gas (methane) which is generally not considered an accelerant. Maybe replace "since" with "if."	Make needed edits	Accept.
432	Table 2. Page 28	E	Table line with "Soil" second column refers to "glassed" containers. Perhaps consider "glass" in this use.	Make edit	Accept.
433	Table 2, end	E	Note on bottom of Table 2. The word "jars" is followed by an apostrophe, and I think it should be a comma.	Change punctuation	Accept.
434	Appendix B	E	Reference number 9. The second author's last name should be spelled out. Given the format used, it likely should be "J.C. Sagebiel." That's me. Thanks.	Make edit	Accept. Bibliography to be revised and reformatted.

436	Annex	T	Add annex with orthogonal detectors	Orthogonal detector table should include potential detectors (metal detection, ground penetrating radar, etc.) that are used in conjunction with the HR dogs. Table should include name of the detector, basic operation, advantages/limitations	Accept. Table A.2 added.
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