

Panel Presentation

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before the

Department of Justice

National Commission on Forensic Science

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Good afternoon, members of the committee. I am Lieutenant Ross Randlett of the Prince William County, Virginia Police Department. I am here today to speak about laboratory accreditation as it relates to a limited service laboratory within a local law enforcement agency.

To provide some background information, Prince William County is located in Northern Virginia, approximately 35 miles southwest of Washington, D.C. The county encompasses 348 square miles and has an estimated population of 421,000. The Police Department has an authorized strength of 610 sworn officers and a support staff of 113 civilian members. Our internal laboratory began as a local ‘identification’ (fingerprint comparison) unit that became popular for law enforcement agencies in the 1970’s.

Since 1987 the Prince William County Police Department has been nationally accredited by the Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA). In 2009, the Department became the fifth law enforcement agency in the United States to earn the TRI-ARC Award of Excellence from CALEA. The TRI-ARC Award is bestowed upon agencies that concurrently hold all three CALEA accreditation awards: Law Enforcement Accreditation, Public Safety Communications Accreditation, and Public Safety Training Academy Accreditation. The Department’s forensic laboratory was accredited by ASCLD/LAB in 2011.

There is no question in my mind that our previous involvement in CALEA accreditation aided us in the process of laboratory accreditation.

The Department’s forensic laboratory provides service in the disciplines of Crime Scene Investigation, Latent Fingerprint Recovery and Fingerprint Comparison. The laboratory is staffed by six (6) sworn Crime Scene Analysts, one (1) civilian Crime Scene Specialists and four (4)

Fingerprint Examiners. The laboratory also supports the Department in providing photographic related materials for courtroom presentation through our Imaging Unit.

From a regional and statewide standpoint, the Prince William County Police Department is considered to be a large law enforcement agency. Within the greater Washington, DC metropolitan area we are one of several local agencies that have an internal forensic laboratory or dedicated fingerprint comparison unit. Of these agencies, we are one of three accredited under ISO 17025:2005. The other two are Montgomery County and Prince Georges County, Maryland. Within the Commonwealth of Virginia, our laboratory represents one of eleven law enforcement agencies having an internal forensic laboratory or fingerprint comparison unit. Some of the laboratories combine their crime scene activities with the forensic testing activities and some do not. My agency currently is the only local law enforcement agency in the Commonwealth of Virginia that has achieved laboratory accreditation under the International standards.

When the National Academy of Sciences released their study, “*STRENGTHENING FORENSIC SCIENCE IN THE UNITED STATES: A PATH FORWARD*”, our then Chief of Police, Charlie Deane, took exception to the proposal to remove forensic laboratories from the control of law enforcement agencies. It was his belief that forensic laboratories should remain within the law enforcement structure to better serve the community. As a result of this, the Department started the journey toward laboratory accreditation in 2009.

In the early stages of our research into laboratory accreditation, there was some hesitation by larger organizational forensic laboratories to share information regarding the process and steps necessary to undertake the accreditation process. In retrospect, I believe some of the hesitation was due to the change by the accreditation bodies from the legacy program to the current

International program. Once the ISO standards were purchased and contact was made with our current accrediting body, more doors were opened and the information flow increased. The Virginia Department of Forensic science was very helpful in sharing their documents and experiences and offering support.

After an initial assessment of our laboratory operation against the International standards, we determined that our laboratory practices and examinations were on sound footing, but our administrative process was lacking. This began the year long process of reviewing or developing, modifying, evaluating and finalizing the numerous documents associated with laboratory accreditation.

A law enforcement agency with an internal Crime Scene and Fingerprint Unit is different from an independent state or regional laboratory. The most distinct difference is that the agency itself has its own policies and procedures in place and the requirements for International accreditation specify the creation of a “Quality” manual specific to the activities of the laboratory. During the policy and procedure development process, parallels were found in policy requirements that mirrored our internal “General Orders” and approved Standard Operating Procedures (SOP’s). As the Quality manual was deemed a separate document, references to established policies and procedures had to be incorporated into this document. As a result of the process, we now have a dual management system whereby the procedures specific to the laboratory are managed by the Laboratory Director and policies that are directly supported by the Department’s management system are managed externally to the laboratory.

Laboratory accreditation to an agency with sound operational practices is more of an exercise in developing the appropriate administrative support rather than reinventing the lab. We were

successful at this point because we brought our people into the process of developing and refining the manuals. The development of the appropriate supporting documents is time consuming and an agency should anticipate a full time position dedicated to this task for at least one year. I had the availability of a consultant to help me in this process. This is one area where most law enforcement agencies will need financial support in the accreditation process. Once the policies are developed, tested, reviewed and approved, the time necessary to monitor the activities significantly decreases where that position can be transitioned into other administrative roles within the laboratory.

One experience that I do want to share is that a law enforcement agency operates with a different set of acronyms, occupational language and workflow than a traditional laboratory. Some of the language in the ISO and supplemental standards is subject to interpretation and some issues arose with our initial submission of conformance documentation based on our interpretation.

For example, our laboratory is internal to our agency. The Department has specified the elements of a report and what is considered to be the original report. All other written reporting of information is supplemental to that original report and is considered to be a supplement. Although there are exceptions written into the standards for reporting, our accrediting body required us to write policy and procedure regarding a issuing a supplement to a supplemental report, which contradicts our Department policy.

In all accreditation processes, there are standards that are relevant to the organization or the activities present and others that are not. Within the scope of our accreditation the most challenging standard to write to was that of uncertainty of measurement. Three full pages of our quality manual are devoted to this standard with the final conclusion that no measurements that

matter are present in our lab. I believe this will be the case in most limited service law enforcement laboratories. I support the International standards for industry standardization, but I do see the need for technical support in areas where an organization does not routinely perform activities. As it is not appropriate for an accrediting body to suggest model language or provide technical support in these types of situations, an independent support group would be extremely helpful. In our case, we did receive considerable technical support from the Virginia Department of Forensic Science in the development of portions of our quality manual.

With the addition of Crime Scene Investigation functions to laboratory accreditation, the standard regarding proficiency testing quickly became a challenge. All accrediting bodies require the use of a certified external test provider for proficiency testing, if available. At the time of our initial development, there were two certified external providers for Crime Scene Investigation. Both providers used an interactive video animation in their testing process. Although certified, the testing did not truly provide a critical evaluation of an examiners capability. By 2013 both providers were no longer approved providers and internal proficiency testing has become our primary testing method.

The discipline of Crime Scene Investigation is one of process, rather than laboratory testing. The examination of a scene for evidentiary recovery and the subsequent laboratory testing relies heavily on the investigators observation and cognitive abilities. The process of crime scene investigation involves four distinct components: Observation, Documentation, Preservation and Evaluation. Each component is a factor in properly investigating an incident and should be proficiency tested in order to verify the competence of a crime scene investigator. This testing need to be performed in a real world setting that includes non-evidentiary materials. Without

having a specific test site designated and monitored, the probability of standardized results diminishes greatly. As such, a nationwide or even statewide proficiency testing program is unrealistic or cost prohibitive.

While I have pointed out some experiences and lessons learned by my agency in moving forward to laboratory accreditation, there are some accomplishments and benefits that I also want to share.

Our examiners have always been highly trained, adept with technological advances in their respective disciplines and professional in their activities. Accreditation has confirmed our assessment of our staff. By having sound practices in place from the beginning, there was little disruption to the daily work flow as we developed or refined the written policies and administrative documentation.

Prior to accreditation the end result of examinations were always well founded, but each examiner may have documented their examinations by different methodology. Some had developed personalized forms or checklists and others preferred free form writing. Accreditation has provided for a more standardized documentation process that was “team” developed. As each examiner had input into the process, there has been less resistance to change. The team concept has carried beyond our initial accreditation and is the current operational mindset.

From a management perspective the laboratory has become more organized and efficient. We were able to develop an internal Laboratory Information Management System (LIMS) to schedule and track workflow that had been previously done by paper and a spreadsheet. Through this system I have better capability to see trends, perform spot inspections on workflow and be proactive, rather than reactive. Most of our internal forms have been converted to fillable online

forms that can be electronically stored or printed if necessary, rather than hand printed and filed in a cabinet. All of our internal documents and manuals are on-line and readily available to the laboratory staff.

Our overall business model has changed from law enforcement to an independent laboratory model. While still fully accountable to the Department and its management structure a freer rein has been given to the laboratory concerning purchasing, training and staff allocation. My budget had been controlled by the Department prior to accreditation and I now am the overseer of the funds. As our internal management changes have occurred, some of our new documentation and accountability practices has been seen as being appropriate for use in other areas of the Department.

Our prosecuting attorney's office, Assistant Commonwealth Attorney Rick Conway has said.....

Quote

“The Office of the Commonwealth's Attorney for Prince William County has always supported the concept and the determined efforts of the Forensic Services Section of the Prince William County Police Department to achieve laboratory accreditation under the International Standards. We view the accreditation process as a major confirmation of the professionalism of the outstanding officers and examiners providing our forensic services. We know that the County Police Lab is working from accepted international standards, generating high confidence in their results, knowing that their testimony is based on those standards.”

Richard A. Conway, Assistant Commonwealth's Attorney, County of Prince William

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In closing, the accreditation process had limited impact on our examiners, but did force a needed change to our business model and helped create the standardization necessary in a forensic laboratory. It is critical for any agency contemplating laboratory accreditation to be committed to the process, open to change and willing to provide the necessary resources to see it through to completion.

Thank You

Discussion Points:

Recommendations

- Funding stream to:
 - hire staff to aid in the development of documents
 - obtain technology to support accreditation (software and hardware)
 - provide auditor training of staff
 - provide advanced technical training for examiners
- Generic model language or public documents from accredited labs
- Permitting internal policies of a law enforcement agency stand alone as conformance for accreditation standards
- Creating waivers for non-relevant standards for limited service law enforcement labs