



NATIONAL COMMISSION ON FORENSIC SCIENCE

NIST
National Institute of
Standards and Technology
U.S. Department of Commerce

Recommendation to the Attorney General Formation of a National Office for Medicolegal Death Investigation

Type of Work Product: Adjudication of Public Comments on Draft Document

Public Comment Summary:

One set of comments was received from a single individual. They are as follows.

1. "White House" instead of "Whitehouse" throughout the document.
2. "After, and even before the time of that publication, autopsy rates in hospitals declined to very low levels, and the medicolegal death investigation system has had to take some "hospital cases" on to the point that the vast majority of autopsies in the United States are now being done medical examiner and coroner offices for the purpose of monitoring the nation's health via reporting of mortality data."

As phrased, the sentence is confusing. Potentially rephrase as follows:

"Both before and after that publication, autopsy rates in hospitals declined to very low levels. As a result, the medicolegal death investigation system has had to absorb so many cases that the vast majority of hospital autopsies in the United States are now being performed by medical examiner and coroner offices, which have assumed responsibility for monitoring the nation's health via reporting of mortality data."

3. Last sentence on page 2: "An ongoing and permanent Office is needed to bring together all interested entities to financially support and improve the medicolegal death investigation system on the front lines of practitioners, and on the back side of acquiring data of interest to governmental and other entities which need death investigation data for their programs."

This sentence, as written, is confusing. Rephrase as follows:

"An ongoing and permanent Office is needed to bring together all interested entities to financially support and improve the medicolegal death investigation and to acquire relevant data for governmental and other entities in need of such data to support their programs."

4. Implementation Strategy section: Last sentence of first paragraph: "Forensic Sciences Accreditation Board." The organization's name is the "Forensic Specialties Accreditation Board."

5. Implementation Strategy section, second paragraph: "It is conceivable and possibly desirable that the physical national office could house the headquarters of...."

Rephrase as follows: "It is conceivable, and possibly desirable, that the proposed National Office could physically house the headquarters of...."

6. "Costs of the Recommendations" section: "The average monthly cost of office rental space has been reported at about \$2 per square foot. Estimated annual costs for the national office physical space (5,000 square feet) and full time equivalent staffing (5 FTE) are \$120,000 and \$441,000 respectively, for a total of about \$561,600. An additional 15% for operating expenses would bring the total to \$645,840 for office space, staffing, and associated office operating costs."

a. What is the basis for these costs? Locality model?, type/grade of office space?, staffing payroll estimates based on what criteria?

b. "Accreditation, Certification, Information Network, Regional Centers, Forensic Pathologist Supply" categories included in the table. What is the source/basis for these figures?

Adjudication Process Used by Subcommittee:

Because of time constraints, the original draft was prepared and approved by the entire MDI Subcommittee. The Public Comments were reviewed and addressed by a primary author of the original draft and were then reviewed, modified as needed, and approved by the entire MDI Subcommittee requiring at least a 2/3 affirmative vote by Subcommittee members.

Itemized Issues and Adjudication Summary:

Each of the comments 1 through 6 above was managed as follows:

1. "Whitehouse" is replaced with "White House" throughout the document.
2. Wording is changed as suggested by the reviewer.
3. Wording is changed as suggested by the reviewer.
4. The suggested correction is made.
5. The suggested wording replaces the original wording
6. a) The office space costs were based on data found on internet sources as noted in references 12 and 13, and the personnel costs were based on data in previous studies such as reference 5, which has been added to the citation numbers. Language is added to address the reviewers concerns.
b) References and language is added to provide/clarify the source of the costs shown.