OSAC Standards/Guidelines Registry Approval Process
RA-700: Adjudication of Comments for Addition to the OSAC Registry

Once a open comment period ends, the Subcommittee/Scientific Area Committee (SAC) that submitted the document for addition to the Organization of Scientific Area Committees (OSAC) Registry shall adjudicate all comments. The Subcommittee/SAC shall reach out to commenter(s) to ensure a full understanding of the comment, facilitate discussion with the commenter(s), and potentially resolve the comment prior to adjudication being performed by the Subcommittee/SAC. (The Quality Infrastructure Committee (QIC) and/or OSAC Affairs are available to facilitate discussions with commenter(s), to include web conferences for documents that have a large amount of comments.)

OSAC Subcommittees/SACs must use the *Comment Adjudication Template* (a separate Excel® file) to document comment adjudication:
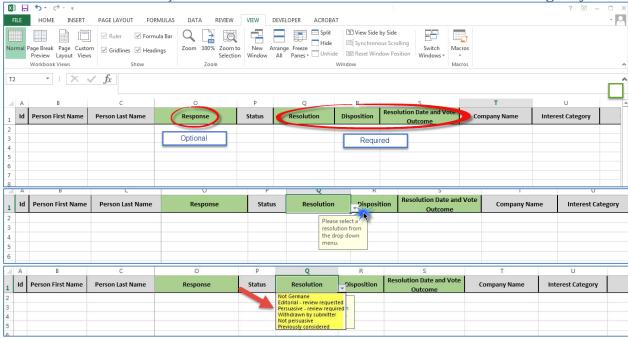
1. **Document Information (Tab 1)** – The Subcommittee/SAC shall complete the "Document Information" tab in the spreadsheet.
2. **Response from the Subcommittee/SAC (Tab 2)** – Any explanatory or other statements the Subcommittee/SAC would like to highlight in response to a comment. (This open text field is optional.)
3. **Resolution of the comment (Tab 2)** – How the comment has been resolved according to the various resolution categories. *Select from the provided drop-down menu.*
4. **Status of the comment (Tab 2)** – If the comment has been resolved or remains currently unresolved. *Select from the provided drop-down menu.*
5. **Resolution Date and Vote (Tab 2)** – The date the comment was resolved and the numerical voting outcome. (e.g. #yes, #no, #abstain)

These fields are shown in green on the *Comment Adjudication Template*. See images below.

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RA-700: Adjudication of Comments for Addition to the OSAC Registry

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The Subcommittee and SAC (or virtual SAC) Chairs, Document Name, Comment Period and other information needed to complete the OSAC QIC Template C- Registry Approval Comment Adjudication Template is provided in the Kavi® system, which can be simply cut and pasted into the template. Some fields (such as interest category) may not apply. The Subcommittee/SAC can assign comments to particular member(s) or task group(s) to suggest resolutions, however, the full Subcommittee/SAC must vote on the final resolution of the comments.

The table below indicates the definition and result of each possible resolution of a comment about the addition of a document to the OSAC Registry.

Term	Definition
Not germane	Comment is not relevant to the OSAC Registry Approval process or to the scope or subject of document being considered.
Persuasive - review required	General agreement with negative comment given, further review by Subcommittee/SAC required and/or return of the document to the Standards Developing Organization (SDO) for significant revisions.
Withdrawn by submitter	Comment withdrawn by submitter.
Not persuasive	Justification for non-persuasive rationale shall be indicated in the response column by Subcommittee/SAC action. Comments made regarding editorial errors in a document, e.g., a misspelling, some other typographical error, can be determined to be not persuasive with the rationale being that the information will be communicated back to the SDO.
Previously considered	Topic of comment was previously discussed and resolved by Subcommittee/SAC.
No response required	Comment does not require a response. (Examples would include praise for the document or general statements in support of the document's addition to the registry.)

Once a resolution is selected, it must be voted on by the entire Subcommittee/SAC. If the resolution passes, the comment has been resolved and can be indicated as such in the Disposition field of the spreadsheet. The Subcommittee/SAC must also record the date the comment was resolved and the resulting vote (a majority vote of a quorum [2/3 members] required to pass). All comments must be resolved before the documents can advance in the process. Once adjudication is complete, the Subcommittee/SAC as a whole reviews the comments and comment adjudication and votes on whether or not to advance to the next stage of the registry approval process.

No document can advance with any persuasive comments. If persuasive comments are identified by the Subcommittee, the SAC is notified and asked to review and confirm the resolution. Following confirmation from the SAC, the QIC is notified that the document will be sent back to the Subcommittee for further review and development and/or returned to the SDO for revisions.

RA-700: Adjudication of Comments for Addition to the OSAC Registry

If no persuasive comments are identified and the Subcommittee/SAC elects to advance the document, the QIC is notified to begin a process control review via Kavi Project.

If the QIC determines that comments have been adjudicated correctly per the process described herein, the packet is sent to the SAC and subsequently the Forensic Science Standards Board [FSSB] for a review of the packet, including comments received, and the comment adjudication template. Interdisciplinary document comment adjudication must be reviewed and approved by all effected SACs prior to submission to the FSSB.

If the QIC finds errors and/or omissions in the process control review, the package is sent back to the Subcommittee/SAC with an explanation and suggestions on how to make appropriate corrections. Comments/comment adjudication will be posted publicly on the OSAC website in the appropriate SAC webpage at the appropriate stage in the process.

	A	B	C	O	P	Q	R	S	T	U
1	Id	Person First Name	Person Last Name	Response	Status	Previously considered	Disposition	Resolution Date and Vote Outcome	Company Name	Interest Category
2							Resolved / Unresolved			
3								disposition from		
4								the drop down		
5								menu.		
6										

Adjudication of Comments Following Successful Appeal:

In instances where the resolution of a comment has been appealed and is successful (see RA-1800 Appeals), the Subcommittee/SAC that performed the initial adjudication will be notified and asked to perform a secondary adjudication of the commment.

To complete the secondary adjudication, the above listed steps are followed with the inclusion of the following additional step: the comment adjudication template is revised to remove all comments previously adjudicated and renamed 'secondary adjudication.' For each comment that obtained a successful appeal, the Subcommittee/SAC performs a secondary review and adjudication and the 'Resolution,' 'Disposition', and 'Resolution Date and Vote Outcome' sections of the table are updated to reflect the results of the secondary adjudication. If the Subcommittee/SAC elects to advance the document, the QIC is notified to begin a process control review via Kavi Project.

If the QIC finds errors and/or omissions in the process control review, the package is sent back to the Subcommittee/SAC with an explanation and suggestions on how to make appropriate corrections.

If the QIC determines that appealed comments have been adjudicated correctly per the process described herein, the packet is sent to the Appeal Independent Review Panel that reviewed the original appeal and the SAC for review and confirmation. Subsequently, the document will be forwarded to the FSSB for review of the packet, including comments received, the first comment adjudication template, appeal, appeal ruling and secondary comment adjudication template.

Appeal/appeal adjudication will be posted publicly on OSAC website in the appropriate SAC webpage at

the appropriate stage in the process.

Appendix A:
Guidance for Adjudicating Opn Comments

When reviewing comments provided and developing adjudication responses, the Subcommittee/SAC should consider the following concepts:

Comments identifying multiple issues:
In each comment, one or more issues may be expressed by the Commenter. Please identify these separate issues to ensure that each is individually addressed.

Same or Similar Comments:
In cases where multiple comments are received, these may have shared themes and issues that are identified. In adjudicating these shared themes or issues, please ensure that your adjudication and response is consistent. For example, if all commenters express the same or similar reasoning for not moving a document forward, please review these comments as one issue and ensure that the adjudication (e.g. Persuasive, Not Persuasive, etc.) and responses are similar or the same. This is to ensure that when the final comment(s) and response(s) are published to the OSAC website, that viewers have a clear understanding of the adjudication and rationale given.

Proposals for Revision:
It is noted that there may be language or editorial issues that one group or individual would like to have changed, but such changes do not affect the overall meaning or purpose of the document.

For the purposes of the Registry Approval process, it is recommended that the following two questions be considered:
1. Is the suggested edit already allowed by the language of the standard?
2. Is the suggested edit a needed/critical revision that should be completed prior to addition of the document to the OSAC Registry?

If a commenter suggests a change that is generally agreed with, please then determine if the change is critical to the proper implementation of the document and therefore, must be completed prior to addition to the OSAC Registry. In such cases, a vote of Persuasive is needed.

If the change does not affect the overall appropriateness of the document to be added to the OSAC Registry, a vote of Not Persuasive may be chosen. Subcommittees/SACs should refer comments related to future revisions to the SDO to join the process of revising the document in future.

Comments related to "we'll fix that in the next version" should be avoided as the SDO process is not under the control of the OSAC and therefore, revisions cannot be guaranteed. All recommended revisions should be forwarded to the SDO for their consideration.

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RA-700: Adjudication of Comments for Addition to the OSAC Registry

Historical Information:

It is understood that many documents being submitted to the OSAC for addition to the OSAC Registry have long been in use by the community and originate with a forensic association, technical working group, or scientific working group. However, once the document is submitted to an SDO and published, this history is superseded by the hard work of the SDO and related committees/sub-committees. It is recommended, therefore, that comments related to previous versions of a document or groups that developed the document should be avoided. The process and SDO that developed the interdisciplinary document currently in the OSAC Registry Approval process should be all that is considered.

Tone and Appropriateness:

The forensic science community is small, and the number of practitioners actively participating in the development of interdisciplinary documentary standards is even smaller. Under these conditions, it is understandable that strained relationships may reflect themselves in the comments submitted. Since all comments and responses will be published on the OSAC public website, it is important for all to maintain their objectivity and professionalism. As such, it is recommended that adjudication responses are short, limited to the comment provided, and clearly express the reasoning behind the adjudication response (e.g. Not Persuasive, Persuasive, etc.). When a commenter may express frustration that they are not more involved in the process, consider recommending in the response that the commenter join the SDO, and participate in the process of revising the document in future.