### Description of Non-conformance:

While the Latent Print Manager was participating in an external proficiency test, he discussed the proficiency with the Latent Print Technical Leader because he had a concern regarding the documentation of his conclusion. Since the Latent Print SOP allows for the characterization of latent prints as "of exclusionary value only" and the Latent Print Manager felt as though one of the test items met that criteria, he was unsure of how to appropriately complete his proficiency test submission form since it only allows for two options: identification or not identified. The Latent Print SOP allows for six different conclusions for any latent print: AFIS-quality, not-AFIS quality, value for exclusion only, no value, no ridge detail and possible suitable latent. The manager also discussed the dilemma with the three Latent Print Supervisors. Because the Latent Print section has an open-concept floor plan and because the Technical Leader and all three supervisors were also participating in the proficiency test, the proficiency test was cancelled for the Technical Leader, the three supervisors and the six other staff members who were participating in that same test. The Technical Leader and the nine other staff members were then assigned an alternate, internal proficiency test. The cancellation was done out of an abundance of caution and with the knowledge that although the Latent Print Manager did seek advice from the Technical Leader (as is appropriate in casework), he did not explicitly state which item number his concern was about.
In order to cancel the ten proficiency tests, the Latent Print Manager cancelled the request associated with item 1 (the original proficiency test) and created a request for item 2 (the alternate, internal PT). The ten original proficiency tests were assigned between 9/10/2019 and 9/11/2019 and the alternate, internal proficiency test were assigned on 9/27/2019. An additional alternate, internal proficiency test was created (making it eleven in total) and assigned to an examiner as a competency test in her re-training program (please see workflow 2019-028/ID# 44789 for more information).

Summary of Root Cause Analysis:

Note: Incidents are documented for tracking purposes and trend analysis. Root Cause Analysis is not required for incidents.

HFSC's relocation to 500 Jefferson contributed to this nonconformance. The Latent Print Comparison section normally undergoes two rounds of proficiency testing each year and assigns proficiency tests to half of the Latent Print Examiners during each round. Since the section was in the process of relocating to 500 Jefferson during the proficiency test due in March 2019, only three analysts were selected to participate in the first 2019 round. Of those three analysts, only two are still employed at HFSC. For this round of proficiency tests, the entire Latent Print Comparison section (less the two analysts who participated in the March 2019 round earlier in the year) was required to participate in order to adhere to accreditation standards. In addition, the two analysts who were not assigned a proficiency test in this round were tasked with completing the verification and technical/administrative review processes. Therefore every Latent Print Comparison section staff member was participating in this proficiency round in some way. Because the Quality Manual clause 7.7.5.b states that "should consultation be required, the one or more individuals with whom the proficiency is discussed may not perform a technical or administrative review of the test" coupled with the fact that proficiency results may not be discussed with other test takers, the Latent Print Comparison section created a situation where discussing/consulting with anyone in the section regarding this proficiency test would have been a violation of the Quality Manual. Also, had a conflict occurred during the verification step, the section would have been unable to adhere to their standard operating procedure since there were no available analysts to participate in the conflict process. The Latent Print Manager has acknowledged the necessity to limit the number of analysts participating in any one proficiency test round so that the section's standard operating procedure can be adhered to throughout the life-cycle of the proficiency.
Actions Taken:
The Technical Leader and two of the supervisors were interviewed by a Quality Specialist. All three stated that they did not believe that the information discussed would bias them in their analysis or conclusions of the proficiency test. While the Latent Print Manager reached a conclusion of “not identified” on the proficiency test provider's results form for item Q5 since he determined its suitability to be “of exclusionary value only”, that conclusion was revised after consultation with the verifying analyst. Item Q5's suitability was determined to be “of value for comparison” and ultimately “identified” to item C. The external proficiency test provider's submission form reflects the agreed upon final conclusion (as is the practice at HFSC) and the proficiency test was submitted to the external proficiency test provider on 10/25/2019.

Section Manager: Tim Schmahl  Date: 11/07/19
Division Director: Amy Castillo  Date: 11/12/19

Incidents or Corrective Actions that involve the Biology/DNA section are reviewed by the Technical Leader and CODIS Administrator.

Technical Leader: Rebecca Green  Date: 11/07/2019
CODIS Administrator: N/A  Date: N/A

Quality Director: Erika Ziemak  Date Closed: 11/15/19