

No.	Comment for SD-5 Version 0	Assessment	Decision
1	<p>Reporting Examples Report example 2 Table content for item 5 lists the substance as "marijuana" The remarks for item 5 includes "marihuana" Consistency in spelling is required <u>The second report example does not include the signature of the analyst</u></p>	<p>correct correct - made consistent</p>	<p>accepted</p>
2	<p>Reference to SD-5. I'm not sure if this matters since SD-5 is used just for examples but, it is my experience when using the date format DDMMMYYYY, all three letters of the month are capitalized. For example 12JUL2020 or 12JUL20. I'm not sure this is universal, my military experience or maybe the preferred DEA way, but the example did look odd to me. Keep up the good work.</p>	<p>consistend format by DD_MMM_YYYY</p>	<p>accepted with changes</p>
3	<p>No suggestions.</p>	<p>no changes</p>	<p>accepted</p>
4	<p>The changes of this document are clear and would further benefit report writing. The changes allow for more specific details on the report such as dates of testing, which would be useful in eliminating questions or requests for further information. I do not see any issues with these changes</p>	<p>no changes</p>	<p>accepted</p>
5	<p>"Item #-XXX-5: The delta 9-tetrahydrocannabinol (D9-THC) content was greater than 0.3% dry weight. The term "marihuana" does not include hemp as defined in section 297A(1) of the Agricultural Improvement Act of 2018 of containing less than 0.3% D9-THC." I find that adding the part about the terminology of marihuana is confusing and unnecessary. Why add the law when it is not our job to interpret the law? <u>I understand that this is only guidance</u></p>	<p>"Part IVA.9.2 Report Writing" requires statements of conformity. Under Remarks, such a comment is appreciated by the customer in this example's jurisdiction.</p>	<p>Revised for clarification</p>
6	<p>I don't have any major concerns, there just seems to be a few inconsistencies in this document. For instance, on page 2 under the Items submitted heading, item 2 is listed as "Item 2.001-2.978"; however, under Results and Conclusions heading it is listed as "Items 2.1-2.978". On that same page under the Purity heading, the purity was determined to be "32% +/- 1.9%". The place values should be equal in this example, so either "32% +/-2%" or "32.0% +/- 1.9%". This same issue occurs on page 4 and 5 were in the table the purity is listed as 32.0% +/- 1.9% (pg4) but in the narrative section it is listed as "32% +/- 1.9%" (pg 5).</p>	<p>the decimals are made consistent</p>	<p>accepted</p>

7	<p>I do not feel that item #'s under "Items Submitted:" should be labeled as "Item 1.1: One brick-shaped package of compressed white powder". This is one item and should remain as the previous version and be described as "Item 1: One brick-shaped package of compressed white powder". By labeling it "Item 1.x" there is an indication that the item is a sub-item of a parent item #1 which is not itemized on the laboratory report. The same is indicated in the numbering of Item #2. There are 978 paper packets and they should be numbered as "Items #2 - 979. Should the 978 paper packets be contained in an outer container of evidence such as a ziplock bag, that bag would be Item #2 which contains Items #2.1 - 2.978.</p> <p>i.e. - Item #2: One (1) ziplock bag containing:</p> <p>Items #2.1-2.978: Nine hundred and seventy eight (978) paper packets, each containing a brown powder. Keeping in mind that if the analyst state 978 packets containing brown powder or each containing brown powder, he/she must have looked at all 978 packets to be sure each one contains brown powder. Otherwise the laboratory report should be clear as to how many paper packets were identified as containing a brown powder.</p> <p>"Results and Conclusions" Section:</p> <p>The addition of adding "Pharmaceutical identifier indicates 30 mg of pseudoephedrine hydrochloride per tablet" is acceptable only if the "pharmaceutical identifier" has been identified. "Tests/Techniques" should specifically state the "pharmaceutical identifier" that was utilized including the name, version and/or date and page number (if applicable).</p> <p>i.e. - "Tests/Techniques: Physician's Desk Reference, 71st Edition, pg. 33".</p> <p>The addition of dates for laboratory activities should always be on the laboratory report but does not need to be listed individually. The dates for all laboratory activities can be expressed as a range.</p> <p>i.e. - All laboratory activities were performed on 7/8/20 - 7/22/20.</p>	<p>We included the parent item which is the packaging material.</p> <p>This section identified the technique used (PID) per IVA.9.2. The details from the technique can be in the case record.</p> <p>No changes as Example 2 lists a date range of performance of laboratory activity between the date of evidence receipt and report date.</p>	<p>accepted with changes</p>
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8	<p>1) Section: Items submitted (Page 2) Proposed change: Suggest to change Item 2.001 to Item 2.1</p> <p>2) Section: Results and Conclusions, Item 2.1-2.978, Weight (Page 2) Proposed change: To be clear and add in that the extrapolated total net weight is for 978 packets. i.e. "(extrapolated total net weight of 978 packets)"</p> <p>3) Section: Results and Conclusions, Item 2.1-2.978, Purity (Page 2) Proposed change: Amend 32% to "32.0%"</p> <p>4) Section: Results and Conclusions, Item 2.1-2.978, Tests/Techniques (Page 2) Proposed change: It is not necessary to state that the LC is a high performance LC. Instead suggest to state only "Liquid Chromatography (LC)"</p> <p>5) Section: Results and Conclusions, Item 2.1-2.978, Tests/Techniques (Page 2) Proposed change: Suggest that the GC-MS date to be before the LC date</p> <p>6) Section: Results and Conclusions, Item 2.1-2.978, Tests/Techniques (Page 2) Proposed change: To remove FTIR as it was unclear which determination uses FTIR for analysis</p> <p>7) Section: Results and Conclusions, Item 3.1, Tests/Techniques (Page 3) Comment: Is FTIR an appropriate technique to confirm the salt form of the tablet given that the tablet contain binders? Was an extraction performed and the analysis was performed on the sample extract?</p> <p>8) Section: Results and Conclusions, Item 4.1 (Page 3) Proposed change: To add in "(salt form undetermined)". i.e. "... or ephedrine (salt form undetermined)"</p> <p>9) Section: Results and Conclusions (Table on Page 4) Proposed change: a) It is not necessary to state that the LC is a high performance LC. Instead suggest to state only "LC" instead of</p>	<p>1) the numbering is unambiguous and might depend on the lab policy used</p> <p>2) weight conclusions updated to agree reporting language by SD-6, A.10</p> <p>3) changed uncertainty to 2%</p> <p>4) We used both possibilities to exemplify the freedom of reporting according to the lab's need</p> <p>5) the suggestions are accepted, dates are in timely succession</p> <p>6) the method FTIR has been removed</p> <p>7) no changes. It is likely an extraction was performed. However sample preparation is not a required reporting component per Part IVA.9.2</p> <p>8) changed</p> <p>9) a) see comment 4) b) changed</p> <p>10) a) changed b) changed</p>	accepted with changes
9	<p>IF we are required to supply dates, Example two is a much more readable report. Reports should be organized and easy to read. Example 1 is very hard to read and find the important information.</p> <p>Has a large group of attorneys ever been consulted before suggesting/instituting changes? Many of the districts we work with have not like some of our changes, or not understand why we changed our reports.</p>	<p>Along Part IVA.9.2. dates of performance of laboratory activity is required. Two different examples are given showing flexibility in reporting. Agreements with the customer are always possible to simplify reports. - no changes</p>	rejected

10	<p>Introduction- Section 9.2 should be "Report writing" (lowercase w)</p> <p>First report example-</p> <p>1. I would like to see the reporting for Item 2.1-2.978 expanded. As written, and considering the potential for non-scientists to be reading the report, it reads as if "hypergeometric sampling plan" is an analysis technique ("...was analyzed using..."). My recommendation: Heroin (salt form undetermined) was identified within powder from each of 28 packets that were sampled and analyzed. Utilizing a hypergeometric sampling plan, an inference at a 95% level of confidence provides that at least 90% of the packets contain heroin (salt form undetermined).</p> <p>2. Item 2.1-2.978- the purity level of significance should be consistent with the uncertainty, recommend "32.0% +/- 1.9%"</p> <p>3. Item 3.1- the result should be specifically limited to the 1 tablet that was sampled and analyzed (per IVA.9.2- "a statement to the effect that the result relates only to the items tested or sampled"</p> <p>Second report example-</p> <p>Incorporate above concepts, additionally:</p> <p>1. Table- " +/- 1.8 gram" should read "grams", similarly for "+/- 0.09 gram"</p> <p>2. Remarks, for #-XXX-2- should read "32.0%" for above recommended reasons but also to match the table that is reported as "32.0%"</p> <p>3. Remarks, for #-XXX-2- should the level of confidence also be given for the amount of pure drug result (last sentence for #-XXX-2)? It can be implied from the other related results that would be used to calculate the #, but that doesn't necessarily mean the level of confidence remained unchanged, and also it's good practice</p>	<p>changed</p> <p>First report example-</p> <p>1. accepted with changes. Reporting harmonized with SD-6.</p> <p>2. accepted with changes</p> <p>3. the given example is clear that one tablet has been analyzed - no changes</p> <p>Second report example-</p> <p>Incorporate above concepts, additionally:</p> <p>1. accepted with changes, we changed the document to 'g'</p> <p>2. accepted</p> <p>3. accepted</p>	<p>accepted with changes</p>
11	<p>I agree with including "level of" for the confidence level.</p> <p>I agree with the delta-9-THC wording for the report.</p> <p>I disagree with the inclusion of dates of performance of lab activities on the report. This information is in the case notes and data pages which are available to the defense when requested.</p>	<p>Along Part IVA.9.2. dates of performance of laboratory activity is required. Two different examples are given showing flexibility in reporting. Agreements with the customer are always possible to simplify reports. - no changes</p>	<p>rejected</p>