Forensic Genetic Genealogical DNA Analysis and Search (FGGS) Sub-Panel Virtual Meeting

October 24, 2025


Welcome

Maryland
GOVERNOR'S OFFICE OF CRIME PREVENTION AND POLICY

October Virtual FGGS Meeting Follow-Up

In an effort to gather feedback regarding whether Maryland should partner with the Investigative Genetic Genealogy Accreditation Board to require the IGG Accreditation Exam as a component of the draft licensing regulations that are proposed to be COMAR 10.51.09 (IGG Minimum Qualifications), please complete this survey by October 17, 2025. All survey submissions will be compiled and presented at the sub-panel meeting on October 24, 2025, for further discussion. For more information regarding the Board, the IGG Accreditation Exam, and/or draft licensing regulations, please refer to the password protected webpage.

Qualtrics Survey

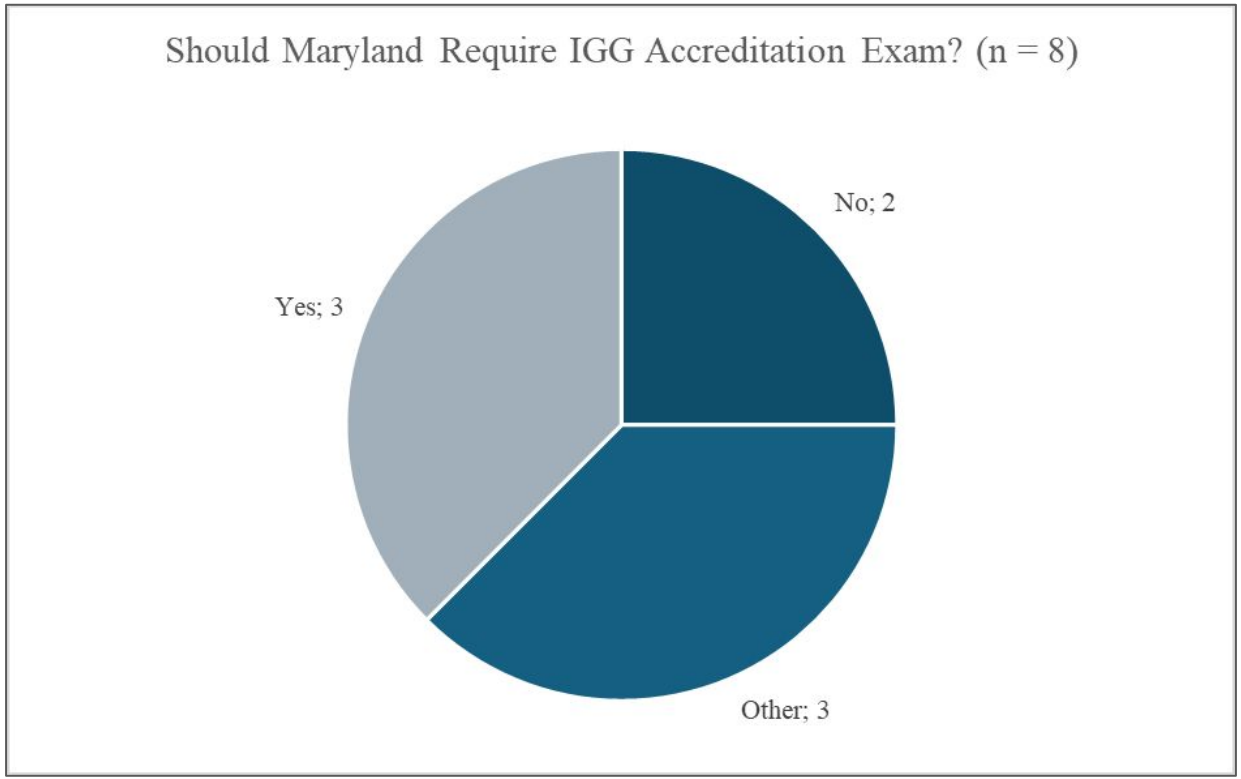
- Should Maryland require an IGG Accreditation Exam as a component of the draft licensing regulations to ensure IGG practitioners meet specified qualifications?
- Should Maryland partner with the Investigative Genetic Genealogy Accreditation Board to require the IGG Accreditation Exam as a component of the draft licensing regulations that are proposed to be COMAR 10.51.09?

Survey Results

Eight Responses



Qualtrics Results: Question #1



Qualtrics Results: Question #2 (Yes)

- Having the professional guidelines and the ability to test the knowledge, skill, and ethical considerations of IGG practitioners is a good idea. A rigorous exam from an independent entity will be the best assessment of a practitioners abilities.
- It is critical that IGG practitioners demonstrate competency in the field, and accreditation is one way to ensure that.
- The intent of the legislation was to ensure that the IGG practitioners were qualified as there is a wide range of individuals doing this work with drastically different levels of expertise. The hope was that the State would support the implementation of a licensing program for both IGG practitioners and SNP labs with staffing, resources, and funding; but that has not been the case. Without such a commitment from the State, the best hope of impactful oversight is by adopting an external option. Therefore, if a reputable IGG Accreditation Exam is available, then it should be used.

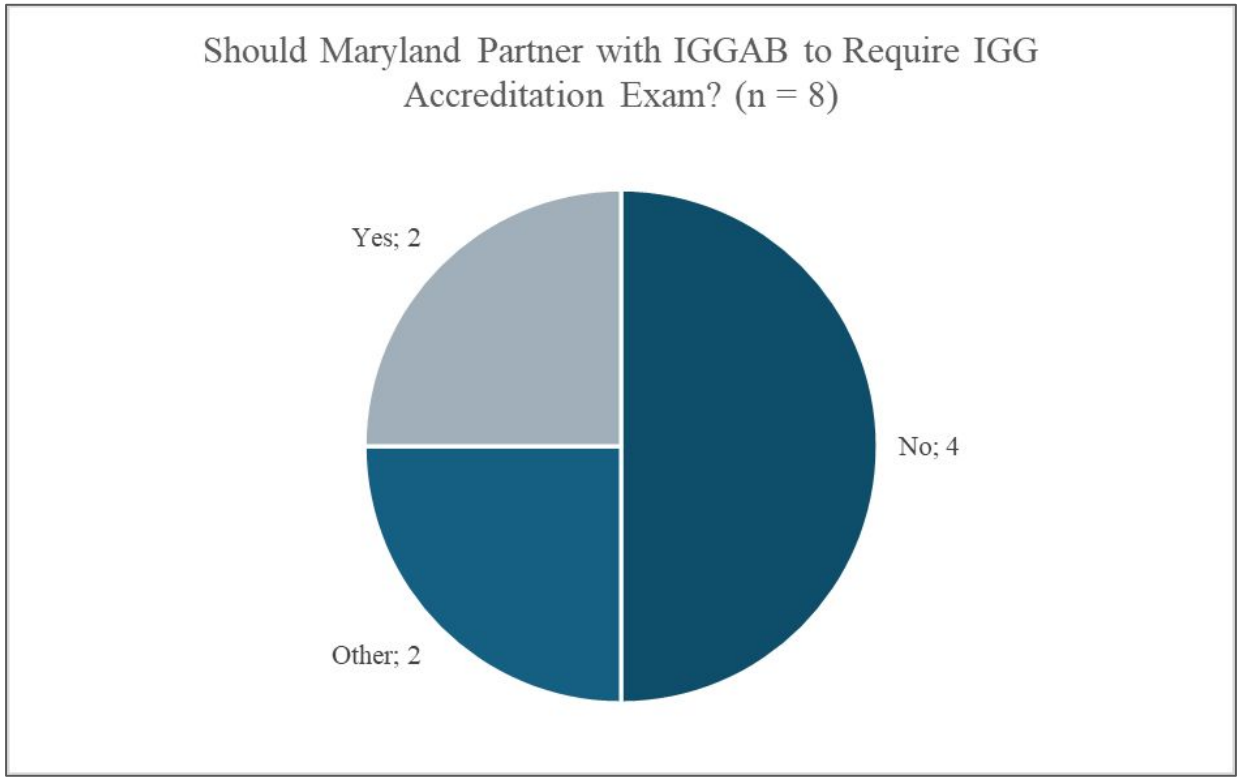
Qualtrics Results: Question #2 (Other)

- I think it should be an option to use it but not be required.
- I think it should be used as a possible method of demonstrating that a practitioner meets qualifications, but not as the only way to meet requirements.
- Maryland would need an MOU with the Investigative Genetic Genealogy Accreditation Board to determine how they will regulate the Maryland regulations.

Qualtrics Results: Question #2 (No)

- Licensing can be a measure of quality but many fields uphold quality without a licensing process. Evaluating education, experience and professional development are other approaches to quality management. Licensing exams are expensive and are an additional barrier for new entrants to fields. The literature on licensing shows that it does not enhance quality or protect consumers.
- N/A

Qualtrics Results: Question #3



Qualtrics Results: Question #4 (Yes)

- A core group of Maryland stakeholders has engaged with IGGAB since they began. Feedback was provided to which IGGAB was responsive and communicative. IGGAB went about the process of establishing their exam in a very structured manner that focused on the fundamental principles of exam preparation. IGGAB should not be the exclusive source of an exam. If another qualified group produces an exam in the future then it should be evaluated and added as an option if found to be appropriate. However, right now IGGAB is the only qualified option and their exam should be used.
- Partnering with an independent board is the best approach to ensure objectivity and transparency.

Qualtrics Results: Question #4 (Other)

- I appreciate the extensive effort invested by the IGGAB in creating their accreditation exam. However, I have several concerns about the composition of the IGGAB and whether they are truly committed to the ethical standards they have set out. The problem, of course, is that there are few (if any) alternatives to the IGGAB, and accreditation is important. I suppose the most important takeaway here is that IGGAB accreditation must not be the only requirement to be a licensed IGG practitioner in Maryland. One concern goes to the composition of the organization and Board, and whom they do NOT have involved in their process. No one on the Board is particularly skeptical about the rise and growth of IGG. Moreover, while the Board is well stocked with law-enforcement adjacent/working investigators or geneticists (e.g. Parabon etc.), there is no one working squarely on the defense side (there is an Innocence Project affiliate, but that is generally only post-conviction work). They also do not have a single person of color or person with criminal legal experience on the privacy trampling/abuse of power side.

Qualtrics Results: Question #4 (Other Cont.)

- . . . Beyond the Board, the inclusion of multiple individuals on the Board of Advisers who were directly implicated in the unauthorized use of genetic genealogy databases (see https://theintercept.com/2023/08/18/gedmatch-dna-police-forensic-genetic-genealogy/) seems to reflect a less-than-forceful commitment to actually creating and enforcing ethical norms. The fact that individuals named in the article disclosing unauthorized use of genetic genealogy databases have not experienced any sort of professional consequence – and one has gone on to become an accredited IGG through IGGAB – makes one doubt how toothsome oversight and enforcement will be. I am not the only one expressing these concerns, Leah Larkin, a respected figure in the genetic genealogy space, has expressed similar concerns and suggested that perhaps IGG should be regulated as a forensic science. See https://thednageek.com/a-board-for-certification-of-investigative-genetic-genealogy-is-announced/. With respect to the IGGAB, she wrote: "What's curious is who's not on the board. There's no one from the forensic sciences. No one from the Department of Justice. No prosecutors or defense attorneys. No experts in civil liberties. And some of the most prominent names in IGG are not listed."
- Same as above. I don't think the exam should be required.

Qualtrics Results: Question #4 (No)

- COMAR 10.51.09 falls under OHCQ who is responsible for the licensing of Forensic Laboratories. The licensing of the genealogists should not be in this regulation since OHCQ does not license individuals.
- I think the accreditation exam should be one way of demonstrating compliance, but not the only way. I think we should partner with IGGAB to the extent of ensuring that the exam meets the requirements that the state wants to put in place for practitioners, but do not think that it should be the only method of demonstrating compliance.
- N/A
- The tool is expensive and was developed by numerous item writers but in silos without them seeing the coverage and level of the assessment tool. Additionally, we have not seen the items on the tool so it is impossible to evaluate. Research has shown that self-regulators such as the IGGAB benefit their own members rather than consumers or consumer agencies. Boards have been shown to frequently ignore misconduct although prosecute unlicensed actors.

Discussion

Recommendations



What Steps Are Needed?

- Draft Regulations to Funnel FIGG Cases - **Proposed to be COMAR 10.51.05.18** (Forensic Genetic Genealogy DNA Analysis)
- Draft Licensing Recommendations for Laboratories Performing SNP or Sequence-Based Testing in Support of FGGS - **Proposed to be COMAR 10.51.08** (SNP Best Practices)
- Draft Licensing Recommendations for Individuals Performing Genetic Genealogy in Support of FGGS - **Proposed to be COMAR 10.51.09** (IGG Minimum Qualifications)

What Steps Are Needed?

Proposed to be COMAR 10.51.05.18

- Should the sub-panel distribute a survey to all known laboratories in the State to identify whether law enforcement agencies submit DNA specimens, subject to SNP or sequence-based testing in support of FGGS, to a Maryland public forensic laboratory that is licensed under COMAR 10.51.03?

What Steps Are Needed?

Proposed to be COMAR 10.51.08

- Should the sub-panel distribute a survey to all known laboratories in the State to gather insight regarding whether they are following all (or a portion of) the recommended best practices?

What Steps Are Needed?

Proposed to be COMAR 10.51.09

- Based on the Qualtrics survey results, how should the sub-panel proceed?


Q & A


Thank You