

Just Certification for Death Investigation

Introduction [00:00:01] RTI International's Justice Practice area presents Justice Science.

Voiceover [00:00:09] Welcome to Just Science, a podcast for justice professionals and anyone interested in learning more about forensic science, innovative technology, current research and actionable strategies to improve the criminal justice system. In episode four of our Supporting Medicolegal Death Investigators mini season, Just Science sat down with Bridget Kinnier and Bethany Smith, the President and Executive Director of the American Board of Medicolegal Death Investigators, also known as ABMDI, to discuss the importance of standardization and accreditation within the MDI community. Because of the complex and multidisciplinary role of a medicolegal death investigator, it is important that there are national standards of knowledge for those who work in the field. In 1996, the ABMDI developed a certification process for practicing investigators, and the board continues to update this process to meet the evolving needs of the field. Describe what it means to be ABMDI certified, what the certification exam looks like, and an exciting new development in the certification process. This episode is funded by the National Institute of Justice's Forensic Technology Center of Excellence. Some content in this podcast may be considered sensitive and may evoke emotional responses or may not be appropriate for younger audiences. Here's your host, Kelly Keyes.

Kelly Keyes [00:01:16] Hello and welcome to Just Science. I'm your host, Kelly Keyes, with the Forensic Technology Center of Excellence, a program of the National Institute of Justice. In 2009, the federal government released a report on strengthening forensic sciences and one of the things that came out of that report and follow up efforts was the need for accreditation among forensic professionals to include medicolegal death investigators or MDIs. Fortunately, for a number of years prior to that report, efforts were already underway to professionalize medicolegal death investigators through a dedicated certification agency, the American Board of Medicolegal Death Investigators, or ABMDI. I am personally a diplomate of ABMDI, but I have two guests today that are much more familiar with it than I am. Please join me in welcoming our guests, Bridget Kinnier and Bethany Smith.

Bridget Kinnier [00:02:05] Hi, Kelly.

Bethany Smith [00:02:06] Hey, Kelly.

Bethany Smith [00:02:07] I know one question that I always get asked, and that's how did I get involved with death investigation? Bridget, how did you get involved in MDI?

Bridget Kinnier [00:02:15] When I first graduated college, I knew I was interested in forensics, and it was a while ago and forensics - there was no degree available. So I graduated and I started looking for jobs in the field and I was lucky enough to find a forensic autopsy technician position at the Virginia OCME. So I started as an autopsy tech. I did that for about two years. And as soon as I met the death investigator here at the office, I knew that's what I wanted to do. I was just completely in awe of what her job entailed.

Kelly Keyes [00:02:46] That's very similar to me. I also started as an autopsy assistant. Bethany, what about you? How did you get involved?

Bethany Smith [00:02:52] So I actually went to college for forensic science and do have a Bachelor of Science in Forensic Science. So during college, I volunteered at the Maryland Office of the Chief Medical Examiner, and I helped them with a lot of the research that they were doing at the time. And then I actually started as a medicolegal death investigator two days after my college graduation at the Maryland office. And I was a full time investigator until I got the position as Executive Director with the ABMDI. And I still do per diem cases here as a county medicolegal death investigator.

Kelly Keyes [00:03:29] So that's a great transition into ABMDI. What can you tell us about ABMDI?

Bethany Smith [00:03:34] So the ABMDI is a credentialing organization for medicolegal death investigators within medical examiner, coroners jurisdictions, and equivalent federal authorities, which would be tribal lands and the military. So what we do is we supply credentials that these medical examiner death investigators all meet the standards, the highest standards of death investigation that were established by the National Institute of Justice. So our certification says that you at least know the basis of how to conduct a medicolegal death investigation based on the standards that have been produced already.

Kelly Keyes [00:04:14] Do I call it an organization? Do I call it a board? How do I refer to ABMDI?

Bridget Kinnier [00:04:18] So ABMDI is a certification organization. There can be a lot of misunderstandings about that. We're not a membership organization. So when you passed the ABMDI exam, you don't become a member of the ABMDI, you become a certificant of the ABMDI. One of the things is that we're accredited by the Forensic Specialties Accreditation Board, or FSAB. It's also important to know that we're, while we're not a membership organization, we're also not a standards accreditation board, so we don't necessarily set the standards for death investigation. Those are set by the NIJ. However, we do, we go by those nationally recognized standards when we're developing test questions or our checklist to demonstrate that someone has the experience they need also goes by the NIJ guidelines.

Kelly Keyes [00:05:06] So, Bethany, can you tell us about ABMDI, how did it come to be, and just what is this certification agency that Bridget's talking about?

Bethany Smith [00:05:14] The ABMDI actually started in 1996. The NIJ had a working group of subject matter experts, there was a 144 of them, and they were formed to create the guidelines for medicolegal death investigations, because at that time they did not have any. From this working group, Mary Fran Ernst and some of the other members decided that a certification for medicolegal death investigators should follow. So after the standards were publicized in 1998, the ABMDI was incorporated in St Louis as a volunteer based, not for profit organization.

Kelly Keyes [00:05:51] Thank you. I recall early on in my career in 1997, I think the administration, maybe 1998, that we administered the test at our office. So I knew it had been around for quite some time and sort of how has it developed from the late nineties to now?

Bethany Smith [00:06:07] So the ABMDI has kind of followed with the flow of certification and accreditation bodies within the field of forensics. So for instance, in 2005, the ABMDI became the second forensics body to be accredited by the Forensic Specialties

Accreditation Board, which is FSAB, and we've maintained accreditation since that time. And the FSAB, just for those who aren't familiar, was started by the American Academy of Forensic Science, and they felt the need for a professional oversight of forensic credentialing organizations, and they were actually incorporated in 2000. So their mission is to accredit forensic credentialing bodies, and they do require recertification every five years. And there are certain requirements that we have to meet in order to maintain accreditation. The FSAB is working on meeting the international standards of 17011, and they are becoming compliant. So the FSAB standards do directly impact some of the ABMDI procedures, such as testing timelines and other requirements that we have. And due to the standards required by FSAB, we're not allowed to sway away from our prescribed policies and procedures because we do not want to lose our accreditation. The ABMDI is recognized certification by name and IACME and their accreditation process, and that's the National Association of Medical Examiners and the International Association of Coroners and Medical Examiners.

Kelly Keyes [00:07:44] Bridget, how did you personally get involved with ABMDI? I'm wondering how long you've been involved -

Bridget Kinnier [00:07:50] I became a registry diplomate in 2003 when I was still doing on call work for the Virginia OCME, and then I became a board certified fellow in 2009 after several years of full time death investigation. And it was in 2014 when then President David Mills sent out a letter on the ABMDI listserv that he was looking to appoint new members to the advisory council. So the advisory council has representation from medical examiners, coroner and federal equivalent authorities and it's also a balanced geographical representation. So I was lucky enough to be chosen then and attended my first advisory council meeting in 2015. Well, the advisory council members, we make up the committees that do the work, the actual work of the ABMDI in between our annual meetings. So I started out by chairing the Outreach and Retention Committee, and then a few years later I was elected to the Board of Directors. There are 11 people on the board of directors and we all serve three year terms. Since then, I've chaired the Ethics Committee, the Strategic Planning Committee, and the Internal Audit committee. Then I served as the Secretary and Vice President and was just elected President at our annual meeting this past October.

Kelly Keyes [00:09:05] Congratulations. You had mentioned that you got started first as a diplomate, as a fellow. I know there's different levels of certification. Can you explain a little bit about those?

Bridget Kinnier [00:09:16] The registry certification, that's the diplomate level, that's the initial level that demonstrates that someone has the necessary basic knowledge and is proficient at on scene death investigation. So typically, someone has at least 640 hours of actual experience before they sit for that exam. The more advanced level is the board certification, or the fellows status, and as the more advanced level, you need a minimum of 4000 hours of actual experience. So as you would expect, the board certification exam is more difficult since it's geared towards people who have at least two years of experience. We're really excited to share to that our Board of directors voted in October to create a new level certification. We have a committee that's actively working on this now. Over the past several years, we've noticed that there are more and more medical examiners and coroner offices that utilize medicolegal death investigators, but for various reasons they're unable to allow them to respond to death scenes. So this new certification level, it'll still require 640 hours of experience, but they'll be able to earn those hours by conducting medicolegal death investigations through phone interviews rather than being on scene.

The committee is still working on all the details, but we're really hoping to have this new level available this year so that those investigators who've been wanting to become ABMDI certified and met all the other criteria but just didn't meet that one requirement that they had to have the job responsibility to conduct medicolegal death scene investigations. And then if they ever move to a different office or the law changes where their office is located, they would then be able to become a registered diplomate once they have that additional job responsibility of death scene investigation.

Kelly Keyes [00:11:06] Wow. That's exciting progress. Bethany, can you talk about the process for a death investigator to become certified? I know Bridget touched a little bit on a little bit of some of the requirements as far as hours, but can you talk a little bit more about that process? How long does it take for most people to get through the process and what's all involved?

Bethany Smith [00:11:27] I'll be speaking on the registry diplomate and status and the board certified fellow status, because, as Bridget mentioned, our newest level of certification is still kind of underway. So that will be something we'll be releasing hopefully in the near future. But for now, in order to be eligible for certification, you do have to be at least 18 years old, have a high school diploma or equivalent, and are currently employed with a medical examiner, coroner or federal authority with the job responsibility to conduct on scene, in person, medicolegal death investigations or supervise those investigations. So even forensic pathologists that are out there that have been to a few scenes, but they do supervise all of the investigators, they also have the opportunity to become certified with the ABMDI. We also require that you have at least 640 hours of experience points for our registry diplomates. So in the past, it was we would require 640 hours of actual scene experience, however, in 2020, we actually changed this to a point system to help address those rural areas where they were not able to get the scene experience just because of case volume. And there were even some rural areas where the laws were making ABMDI certification a requirement and they just were not able to meet it because of case volume. So at that point, we tried to address some of those areas and we moved to a point system. So the point system, just for a quick break down would be that you have to have the 640 points. So if you are working full time, that would be equivalent to about four months full time. However, if not, you can have at least 384 points in scene investigation experience and phone investigation experience. And then the other points can be done through different tasks, such as viewing autopsies, using points for an advanced degree or using points from conferences that you have attended that ABMDI would accept under the same standards as continuing education. For those, you also have to be able to complete the 52 tasks that have been determined essential to the field. So once you meet those minimum guidelines, you would apply and the application process requires an application form which has your demographic information and code of ethics that has to be signed, a notarized employment verification form, and if you're using those point systems, there's additional documentation you would have to submit. We require professional reference, and the training checklist, which I mentioned, is a checklist of the 52 tasks have been determined to be essential in the field of medicolegal death investigation. And since the ABMDI is a national examination, there's tasks on the checklist that not all officers do, but we require that you at least have knowledge on how to complete the task independently because you will be tested on this information and since we are national in scope, we expect that if one certificant were to move from one jurisdiction to the other, they would at least have a basis of knowledge on how to perform tasks within other offices. Once all the paperwork's filled out, you send it back to the ABMDI office, we process it, and then we allow you to sit for the examination.

Kelly Keyes [00:14:50] I love how adaptable you guys have been over the years to some of these rural, smaller offices, you know, that have such low volume. I love that that you've adapted and really adjusted to allow those folks to be able to do this as well. I know you haven't had a chance to talk about fellow, but you did just talk about that test, and I remember my testing day pretty well. Can you talk about that final test? I know that was a pretty nerve wracking time for me, even with many years of experience.

Bethany Smith [00:15:20] Yeah. So for the final test, it has to be taken within the 18 month timeline of when you first apply. So I always suggest if people are going to apply, make sure they meet the minimum of the application requirements prior to applying because there are timelines you have to meet and you do have to sit for that initial exam within 18 months of applying. But the registry examination is a multiple choice examination of 260 questions and it's broken down into eight sections. Each of the eight sections hit a different category, such as ethics, there's scientific knowledge, investigating deaths, interacting with families and law enforcement. Those are just a few of them. And each one has a different cut score, and that's based on the importance that was determined through a job task analysis. So a job task analysis was done through subject matter experts throughout the field back in 1996, and then it was redone again about five years ago. So our cut scores are based on what subject matter experts feel are important to be knowledgeable within the field and that's where our test questions come from. So you have to take all eight sections and you have to pass each section. If you fail the section, you do have the opportunity to retest and you only have to retest the section that is failed.

Kelly Keyes [00:16:42] I think that would be very useful for for everyone to know, you know, on the off chance that, you know, something does happen and somebody doesn't pass a section than at least you don't have to go through the whole thing again.

Bethany Smith [00:16:52] Yeah, I think it helps out a lot. Especially with those that struggle with any kind of test anxiety. You know, you don't have to face all of those multiple choice. You're just going to have a smaller section. And we do actually allow you two opportunities to retest. So if you don't pass the initial exam, you have two opportunities to sit for a retest. And then unfortunately, if you don't pass on the third attempt, you do have to wait. You would have to reapply and your application packet would have to be completed by a new trainer before you can sit for the entire exam again.

Kelly Keyes [00:17:22] I hope that that doesn't happen too often. I would feel terrible for those folks. Now what about the next level.

Bethany Smith [00:17:28] For board certification, the requirements are also a little bit different. As Bridget had said, they do require 4000 hours of experience, so that's about two years full time. And we require at least an associate's degree along with the current employment in the field. So that application process, you again have an application form with demographics, the code of ethics, and you have to have three professional references; one from your administrator, one from a forensic science specialist and one from law enforcement. And then that examination actually consists of two parts. There's a multiple choice section, which is also divided into eight sections. And then there's a case scenario section where you have three case scenarios, and in those scenarios you are provided with photographs and you have to write a narrative using medical terminology, identify pieces of evidence, and come up with interview questions. So there are benchmarks for each one of the scenarios that have to be met. Each multiple choice section has a different cut score, and the scenarios have benchmarks that have to be met

in order to pass. And again, you are allowed to retest with those. If you fail one of the three cases, you only have to retest one more case.

Kelly Keyes [00:18:45] So I know when talking with folks in the community that people are always, you know, I want to get certified, what do you suggest for me? I'm nervous about the test, and I know one thing that I always suggest that I found incredibly helpful when I was taking the test was the online test question. That's certainly something that I definitely recommend people do if they want to get certified and take the test. Bridget, Is there certain things that you recommend if somebody wants to get certified?

Bridget Kinnier [00:19:12] So we'd suggest if someone wants to get certified, that they - the most important thing - that they wait until they have 640 points prior to applying. That way you're not rushing to get everything completed when the application process starts and you only have 18 months to do that. You need to keep in mind that we have internal timelines that we have to meet. So you're sure to take those into consideration, especially if you need the certification in a specific timeframe for your own employment. Most importantly, I suggest reviewing the reference materials. Those are available online on our website. There's a skill task list for the registry exam and it describes everything that you'll be tested on in each section.

Bethany Smith [00:19:51] I would just really try to say to make sure you have those points at least very close when you apply, because unfortunately a lot of times things get returned, there's mailing issues and slowdowns. So that really is my biggest advice. And again, the skills task list. We have one for the registry exam and we have one for the board certification exam. And I think those are great references to look at and they can even help you figure out what other reference materials to look at to try and better your chance.

Kelly Keyes [00:20:22] Can you share how many investigators are certified.

Bethany Smith [00:20:25] As of today, there are 2156 certified medicolegal death investigators. So out of those right now active, we have 1952 registry diplomates. So when I say active, if you were to look at our web site and look at our certificants directory, you would see we have active and inactive, and inactive are those people that are maybe no longer in the field, but they just haven't reached the end of their certification period or they're just kind of past due on some of the annual fees that we have.

Kelly Keyes [00:21:02] Once an investigator's certified, Bridget, what's required on an ongoing basis?

Bridget Kinnier [00:21:08] There are a few things that a certificant needs to be mindful of; certification last for five years. So that means we have five years to obtain 45 hours of approved continuing education. The keyword being approved. Our website outlines in detail what types of courses are approved. It's also important that the course be relevant to the field of medicolegal death investigation. So just because a course is approved for AMA credits doesn't necessarily mean that the ABMDI will be able to accept it. For instance, we wouldn't be able to approve a dermatology course on psoriasis, even though it may be approved by the AMA. And there are two things that I always encourage everyone to do when it comes to continuing education. The first is if it's not advertised as being approved by the ABMDI, including having a course number or another pre-approved organization, feel free to reach out and ask if it's approved. You can either ask the ABMDI office or you could ask the person or the organization putting on the course. As part of our FSAB accreditation, the course has to be approved prior to it actually being held, and we have

unfortunately no wiggle room at all there. The second thing that I highly suggest is uploading your con-ed hours to your ABMDI profile as you earn the hours. If for some reason a course that you attend isn't going to be approved, it's better to find out right away rather than when you're at the five year mark and you have no time left to get the hours that you need to recertify. Certificants also need to reaffirm the code of ethics when they're due to recertify. It's really important that all certificants are aware of both the code of ethics and the code of professional standards. The ABMDI takes this so seriously because part of our purpose is to encourage the highest standards of ethical conduct among investigators. We also need to be considered in good standing when it's time to recertify. And that means being up to date on our annual maintenance fees. That's due March 31st of every year and it's separate from the recertification that we go through every five years. And the last thing that we need to do is to complete a new employment verification form to show that we're still working as a medicolegal death investigator. And again, that's because we're accredited by FSAB. And one requirement is proof of continued competency in order to recertify. So currently working in the medical examiners or coroner office as a medicolegal death investigator demonstrates that. But if someone's in between jobs or for whatever reason is not currently an investigator at a medical examiner or coroner office, if they're able to demonstrate their continued competency by passing a recertification exam, this is a one time opportunity for a single period of unemployment and it has to be completed prior to your expiration date when you have to recertify. Something else that I'm not sure people are aware of is that if you're no longer an investigator, when it's time to recertify and you've been in good standing for at least ten years, you can request to go into retired status so you'll no longer have to pay the annual maintenance fees or go through the recertification process, but you'll be able to keep your access to the ABMDI listserv and our quarterly newsletter. And then you'll still have those letters after your name, it'll just say retired, D-ABMDI.

Kelly Keyes [00:24:28] Bethany, you've mentioned a couple of changes, you know, and I know Bridget alluded earlier to one of the big changes that sounds like you've got going on. Are there other changes that have occurred over time?

Bethany Smith [00:24:39] So the ABMDI and the board of directors and myself in committees, we are constantly reviewing our policy and procedure manual to make sure that we are up to date with changes in the field. Some of the biggest changes that have happened to the ABMDI certification over time were in 2007, we actually required employment with the 640 hours of experience in order to qualify. Prior to 2007, you had to be signed off on tests and sit for the examination. But you did not have to be employed so you could take a 40 hour course and get signed off on and become ABMDI certified without the employment. However, due to our FSAB accreditation, which does require current employment, we did have to make that change. So ever since 2007, that has been one of the biggest qualifiers for certification. In 2013, we started administering our exams through colleges and universities. The people that kind of know ABMDI in the beginning know that it would be held at different offices by different proctors or set times throughout the nation. But to kind of make it more available, we allow it through university and college testing centers. And then that's also the same time when we started the recertification exam for certificants that were not employed at the time of recertification. The next biggest change would have been in 2020 when we made the point system that allowed experience from other categories to be used instead of strictly employment experience. And this was one of the biggest changes to certification, and again was in response to legislation being enacted requiring ABMDI certification in specific jurisdictions.

Kelly Keyes [00:26:27] So I'm curious, when you're out talking with members of the community or at a conference or something, what are some of the reasons that you hear that people say that they don't get certified?

Bethany Smith [00:26:36] What I hear is that a lot of them don't have it within their budget and that if it's not within their budget, they don't have the money to apply for trainings and things of that sort to keep their certification once it's gained. But I think it's very important for people to know there are a lot of free online continuing education opportunities that they could have. So even if it was just keeping their continuing education due to budget, there are other opportunities we had with that.

Kelly Keyes [00:27:08] So really it's more the cost of the maintenance of certification than the actual certification itself. Is that what you're -

Bethany Smith [00:27:15] Well, I hear both. So initial certification, it is \$50 to apply for our registry level and our examination is \$350. So a lot of people, if there's not any encouragement in their office or it's not required, that's kind of a large amount of money to pay, especially if it's not something that's going to be recognized in their jurisdiction.

Kelly Keyes [00:27:38] Bridget, are those similar to the reasons that you hear?

Bridget Kinnier [00:27:41] Yes, definitely. Having to pay for the exam out of pocket can be difficult for investigators. They work in an office that just isn't able to pay for those fees. One issue we've heard about is that in some places, death investigators don't have the ability or legal authority to respond to death scenes to complete their investigations. But we're hoping that this new certification level will make ABMDI certification possible for them as well.

Kelly Keyes [00:28:07] So you both work in offices still, and I'm curious, Bridget, what's the level of involvement, you know, in your office as far as your investigators being certified?

Bridget Kinnier [00:28:17] So the Virginia OCME requires that all investigators are registry certified within two years of employment. We have 31 staff investigators and of them currently 18 are certified with five of them having achieved board certification. We also have about 10 on call investigators who have their certification as well. Several years ago, my office started being able to pay for certification exam for investigators, and that's been incredibly helpful.

Kelly Keyes [00:28:45] I know a death investigator and he tells a story about one time when he had to go to court and one of the attorneys was asking him, are you from an accredited office and are you certified? And I think the attorney, he said, really thought that he was going to say no to both of those questions, but he was able to say, yes, my office is accredited. Yes, I am certified by ABMDI. And, you know, he said it really got him a lot of respect as far as his testimony was concerned. I'm wondering if you hear other stories from the community about benefits of certification.

Bridget Kinnier [00:29:19] Well, yeah, Kelly, I think the biggest benefit is that if you have your ABMDI certification, it sends a clear message to anyone in this field that you're capable of a competent medicolegal death investigation. That you have real life experience as a death investigator, that you know what questions to ask, and you're able to conduct a thorough, medicolegal death investigation.

Kelly Keyes [00:29:39] If someone wants to get involved in ABMDI as an organization, what sort of opportunities are there for them? What should somebody do who's listening to this who wants to get involved?

Bethany Smith [00:29:50] The ABMDI is a volunteer, not for profit organization. And the ABMDI is composed of an advisory council which would keep about 25 people on a advisory council. They're from all different places throughout the United States. A mixture of medical examiner and coroner offices as well as difference in registry diplomates and board certified fellows. And they actually do committee work and they do test revisions. But I always suggest if somebody were interested, they would just reach out to the ABMDI office and let them know that they were interested. Maybe even write a newsletter article for one of the quarterly newsletters. And that would be a way to kind of get introduced into how the organization functions.

Kelly Keyes [00:30:35] It sounds like there's a lot of great opportunities, and I love how you continued to adjust and acclimate and make changes to the process over the years. That's really nice that you're able to to keep it contemporary and keep up with the needs of the profession while you professionalize things. With that, Bethany, I'd like to give you an opportunity, any parting thoughts?

Bethany Smith [00:30:55] Yes. So I want to thank you for allowing us to discuss the ABMDI and having this opportunity to get information out about our certification. And I also want to suggest that even for those who are trying to break into the field of death investigation that don't be intimidated when requirements state that ABMDI certification is suggested or is preferred. All employers know that in order to be ABMDI certified, you do have to have experience. So even if this would be your first job in the field, you should be allowed the time to get certification. So we just don't want people breaking in the field to not apply for these positions because offices do know they need that experience.

Bridget Kinnier [00:31:37] Well, I definitely want to second what Bethany said. I frequently interview people who are applying for investigator positions, and I promise there's no expectation that someone already have their ABMDI certification until they've actually been employed as a death investigator, because we know it's just not possible. I do want to encourage death investigators who've been thinking about sitting for the exam, there's a suggested reading list on our website. If you couple that with your real life experience, you have all the necessary tools to be successful in this test. And then once you have your ABMDI certification, those employers at medical examiners and coroner offices, other medicolegal professionals, forensic pathologists, they'll know that you're capable of conducting a competent and thorough death investigation.

Kelly Keyes [00:32:21] You know, as a certificant, I learned quite a bit today, and I appreciate that. And I thank Bethany and Bridget for sitting down with Just Science to discuss all of the work that you're currently doing to continue to professionalize medicolegal death investigation and those who perform such valuable work. Thank you so much for being on the show.

Bethany Smith [00:32:40] Thank you. And you're welcome.

Bridget Kinnier [00:32:41] Thank you, Kelly. We really appreciate it.

Kelly Keyes [00:32:44] You enjoyed today's conversation, be sure to like and follow Just Science on your podcast platform of choice. For more information on today's topic and resources in the forensics field, visit ForensicCOE.org. I'm Kelly Keyes, and this has been another episode of Just Science.

Voiceover [00:33:03] This episode concludes our Supporting Medicolegal Death Investigators mini season. Stay tuned for Sexual Assault Awareness Month in April. Opinions or points of views expressed in this podcast represent a consensus of the authors and do not necessarily represent the official position or policies of its funding.