

Guidelines for Protecting and Using Data from Industry and Other Third Parties

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Data from Other Sources
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Data and FSIS Decision Making

- Sound data is essential to support the agency's actions aimed at protecting the food supply and achieving its public health mission
- Use of data from industry, academia, states, consumers, and foreign countries could:
 - fill important data gaps
 - provide the agency with the best available data to inform decision making by adding robustness, quality and validity

Guidelines for Data Use

- FSIS utilizes federal and USDA information quality guidelines and regulations that apply to creation, collection, maintenance, dissemination and protection of data

Guidelines for Use of Data

- Important to ensure that all data used in decision making, regardless of source, meet certain criteria:
 - Objectivity
 - Utility
 - Integrity (including confidentiality)

Criteria for Data

- **Objectivity**
 - Ensures data is substantive, accurate, reliable, complete and unbiased
 - Source of the information will be identified to allow the public to assess if the data is objective

Criteria for Data

- **Utility**
 - Usefulness of the data
 - Clearness of data
 - Accessible to persons as per Section 508 of the Rehabilitation Act (hearing and sight special needs)

Criteria for Data

- Integrity
 - Prevention of corruption or falsification by protecting information from unauthorized access or revision
 - Security of information as per Federal Information System Managers Act (FISMA)

Criteria for Data

- Confidentiality of information
 - Privacy Act of 1974, as amended
 - Paperwork Reduction Act of 1995
 - Computer Security Act of 1987
 - Freedom of Information Act
 - OMB Circulars A-123, A-127, and A-130

Options for Data Submissions

- **NACMPI comments:**
 - establish ground rules for submission, acceptance and use of voluntarily submitted data
 - use of a third-party data repository
 - use of a third party to review the data being submitted to the agency
 - use of aggregate data

Other Options for Data Submissions

- Taskforce model from EPA
 - comprised of industry, consumer groups and agency representatives
 - set criteria for submitting, reviewing, accepting and protecting data
 - organized to gain consent from the owners of the data and share information
- Regular data meetings with stakeholders

Next Steps

- Currently examining these and other options for accepting and protecting data submission
- Inviting at this meeting and in the future input and ideas from stakeholders on collection and use of third party data
- Any process FSIS develops needs:
 - Checks and balances
 - Transparency
 - Coordination with agency policies and IT security requirements