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FSIS Establishment-Specific Data Release Strategic Plan

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Outline

- Background
- FSIS Actions
 - ✓ NACMPI
 - ✓ NAS
 - Recommendations
 - ✓ Development of DCC Workgroup
- Overview of Draft Report
- Next Steps
- Additional Considerations

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Background

- ❑ Publication of federal-level policy documents regarding transparency and data sharing.
 - ✓ 2009: Obama Administration: *Memorandum on Transparency and Open Government*
 - ✓ 2009: OMB: *Memorandum for Heads of Executive Departments and Agencies*
 - ✓ 2011: Obama Administration: *Memorandum on Regulatory Compliance*
 - ✓ 2013: Obama Administration: Executive Order: *Making Open and Machine Readable the New Default for Government Information*

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FSIS Actions: NACMPI

- ❑ 2010: Consultation with the National Advisory Committee on Meat and Poultry Inspection (NACMPI) Subcommittee on Data Collection, Analysis, and Transparency

Major Findings:

- ✓ Recommended that FSIS pursue posting of data with a high public health value.
- ✓ Recommended that “FSIS obtain guidance from NAS [the National Academy of Sciences], NACMCF [the National Advisory Committee on Microbiological Committee for Foods], or other entities with recognized expertise in data management and analysis to improve data accessibility and usefulness for internal as well as external stakeholders.”

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FSIS Actions: NAS

- ❑ 2010: FSIS asked the National Research Council (NRC) within the National Academies to “conduct a study to examine the potential food-safety benefits and other consequences of making establishment-specific data publicly available on the Internet.”
- ❑ The NRC convened a *Committee for a Study of Food Safety and Other Consequences of Publishing Establishment-Specific Data*.
 - ✓ Committee reviewed FSIS’ current data sharing activities, explored how other government agencies share data with the public, and laid out an approach for FSIS’ release of establishment-specific data that considers the benefits and costs of data sharing.

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NAS Conclusions

- ❑ Public release of establishment-specific FSIS data, by themselves or in combination with other privately or publicly available data, could yield valuable insights that go beyond the regulatory uses for which the data were collected.
- ❑ The available evidence of adverse effects of public release of establishment-specific data by other government agencies is insufficient to predict specific problems that would be inherent in the release of establishment-specific data by FSIS.
- ❑ There are strong arguments supporting public release of establishment-specific FSIS data, especially data that are subject to release under FOIA, unless there is compelling evidence that it is not in the public interest to release them.
- ❑ To maximize its effectiveness and minimize its potential for adverse unintended consequences, data disclosure needs to be guided by a carefully designed information-disclosure strategy.
- ❑ Effective disclosure systems are designed to allow continuous improvement as users gain a better understanding of how the data might be used and as the agency responds to stakeholder input.

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FSIS Actions: DCC Workgroup

- ❑ Based on findings from NACMPI and NAS, FSIS convened a DCC Workgroup in 2011/2012 to develop a strategic plan to guide the release of establishment-specific data.

The workgroup:

- ✓ Conducted reviews of data release/sharing approaches adopted by other regulatory and non-regulatory agencies (e.g.; EPA, FDA, CDC)
- ✓ Consulted with FSIS stakeholders
- ✓ Analyzed FSIS data holdings
- ✓ Developed a draft list of criteria for evaluating potential datasets for public release, as well as procedures and limitations for data release
- ✓ Developed draft Strategic Plan for data release



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FSIS Establishment-Level Data Release Strategic Plan

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Major Plan Components

- Evaluation criteria
- Procedures
- Limitations
- Process
- Datasets under consideration

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DRAFT Data Release Evaluation Criteria

- Are the potential data already eligible for release through a formal FOIA request to FSIS? This includes consideration of:
 - ✓ The frequency of past requests for this information via FOIA
- Does the potential data contain Personally Identifiable Information (PII) for FSIS personnel?
- What is the potential impact on industry and does the potential data contain embedded corporate proprietary data?
- What are the expected personnel and monetary costs to FSIS to release the data?

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- What is the estimated utility of releasing the data? This includes consideration of:
 - The potential impact to public health
 - The estimated utility for this information to positively contribute to scientific research and endeavors
 - The estimated utility of this information for the regulated industry
 - Whether releasing the data increases FSIS' ability to be transparent to stakeholders
- What is the potential for misunderstanding/misuse of the data? This includes consideration of:
 - ✓ The completeness of the data
 - ✓ The quality of the data
 - ✓ The complexity of the data
 - ✓ The availability of context for the variables (definitions for each field plus text that describes the methods of data collection, sources of variability, and changes in procedures that affect data consistency)
- What are the security implications to FSIS and the regulated industry in releasing the data?

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DRAFT Procedures and Limitations for Data Release

- ❑ Proposed procedures include, but are not limited to:
 - ✓ Use of Data.gov for venue for data release
 - ✓ Development of a data dictionary for each dataset
 - ✓ Format for data release (e.g., machine-readable)
 - ✓ Level of aggregation
- ❑ Proposed limitations include, but are not limited to:
 - ✓ No release of PII, or corporate proprietary data
 - ✓ No current release of historical FSIS data (PBIS)
 - ✓ No release of NR text and other sensitive, difficult to redact free-text fields

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FSIS Process for Data Release

- ❑ It is FSIS' intention to follow the process outlined below for releasing datasets:
 - ✓ FSIS intends to release only one dataset from the Priority List at a time.
 - ✓ For each dataset, FSIS intends to first release a sample data set with all associated documentation to interested stakeholders for review.
 - ✓ Once a review of the sample dataset has occurred, and any necessary changes are made, FSIS will release the full dataset on Data.gov.
 - ✓ Datasets will be released in a format that is compatible for analysis with existing FSIS public datasets, such as the Meat, and Poultry, and Egg Inspection Directory (MPI Directory) and existing FSIS datasets on Data.gov.
 - ✓ For more information about the FSIS Meat, Poultry, and Egg Inspection Directory, please visit the following website:
<http://www.fsis.usda.gov/wps/portal/fsis/topics/inspection/mpi-directory>.

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FSIS Data Being Considered for Release

Using the criteria developed and considering the procedures established by FSIS, the Agency has developed a preliminary list of datasets for public release:

- ✓ Salmonella sampling and serotype data for young chickens (HC11_BR)
- ✓ Salmonella sampling and serotype data for young turkeys (HC11_TU)
- ✓ Salmonella sampling and serotype data for comminuted poultry (HC01_GC & HC01_GT)
- ✓ Campylobacter sampling data for young chickens (HC11_BR)
- ✓ Campylobacter sampling data for young turkeys (HC11_TU)
- ✓ Salmonella sampling and serotype data for RGB (HC01_GB and MT43S)
- ✓ STEC sampling data for Raw Ground Beef (RGB) (MT43)
- ✓ STEC sampling data for beef trim (MT55 and MT60)
- ✓ STEC follow-up sampling data (MT44, MT52, and MT53)
- ✓ STEC sampling data for beef components (MT54)
- ✓ Listeria monocytogenes and Salmonella sampling data for Ready-To-Eat (RTE) (RTE001 and ALLRTE)
- ✓ Chemical residue sampling data—routine testing (RM12)
- ✓ Repeat violators v. single violators
- ✓ Advanced Meat Recovery (AMR) sampling data (AMR01) and follow-up (FAMR01)

Note: At this time, FSIS is only considering posting data starting January 2, 2012

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Questions for the Committee

- How would the Committee recommend FSIS prioritize the list of datasets to be released?
- Are there datasets that are not included on the list that should be considered?
- How would the Committee rank/group the evaluation criteria? Are there any additional criteria that we should consider?