

National Advisory Committee on Meat and Poultry Inspection
August 8-9, 2007 Meeting

Issue: Data Collection and Analysis at FSIS: Standard Operating Procedures

The Agency presented the following questions to the Committee.

- 1. Do you have any suggestions for improving our strategy for data collection and analysis?*
- 2. Do you have other suggestions for stakeholder input in this process?*
- 3. Do you have any other suggestions for conducting the peer review?*
- 4. Do you believe it would be worthwhile to form an ongoing subcommittee to assist FSIS in evaluating various data issues? If so, please provide a rationale as to why it would be useful and recommendations on how it would be structured and should operate.*

The Committee submitted the following recommendations to the Agency.

1. Do you have any suggestions for improving our strategy for data collection and analysis?

The committee supports the development of the framework for collecting and analyzing data and believes in general that the strategy for data collection and analysis is sound. It does suggest that the Data Analysis and Integration Group (DAIG) consult with others on this process, especially Mike Taylor who has recently done some related work. The committee emphasizes that data should be collected for a purpose, not just for the sake of collecting the data, and that the thought should always be toward what is the issue that needs to be addressed. The committee also cautions that the task being undertaken is large, especially given the potential volume of data, and the time-lines for activities should be taken into consideration so as not to delay progress on projects.

The committee also emphasized that the DAIG should be examining existing data, and not just moving towards collecting new data. All data within a given dataset should be considered to avoid 'cherry-picking' the data, and the data should be representative (e.g., if inspection data, should be representative of all facilities, not unique to those from which the data was gathered). The committee also indicated the input from field personnel, including inspectors, Public Health Veterinarians and Front Line Supervisors who use the databases, would be useful.

Different types of data, including qualitative information, can be very useful and should be captured, possibly as support for or verification of quantitative data. The Agency should explore ways to standardize qualitative data (e.g., more specific codes for tasks to better link to microorganism programs, check boxes, drop-down menus, etc., that would

help standardize the language and interpretation of activities across FSIS) to make it more amenable to analysis. While doing so, the Agency should gain more specificity, without losing the detailed information. The implementation of this could be verified by supervisors.

2. Do you have other suggestions for stakeholder input in this process?

The committee believes that broad stakeholder input in the process will be essential. Stakeholders include other agencies, such as the Centers for Disease Control and Prevention (CDC), Congress, industry and consumer representatives. Other agencies who have dealt with similar issues could be engaged to learn from their activities. Industry input will be extremely valuable when collecting information from the field. The field workforce should also be engaged as a stakeholder in the process to help ensure that the data collection is robust and consistent. The expectations of stakeholders should be clear, and they should be included at the initiation of a project and through the end. To ensure continued stakeholder participation, the results should be delivered on time and should meet the stated goals of the project. The results of the data and data analysis, as appropriate, should also be made available publicly for stakeholders to see, review, and use.

The committee believes there have been issues with consistency of FSIS data, and the data needs to become more consistent. The development of Standard Operating Procedures (SOPs) and training or increased training on data entry and collection could increase that consistency. The effectiveness of the training should be verified and validated. To accomplish this, FSIS should evaluate the ability of its structure to support this initiative and associated training.

3. Suggestions for conducting the peer review

The committee agrees that external peer review is a critical aspect of the data collection and analysis process. Subject matter experts must be used, and there are advantages to having the subject matter experts convened as a standing team(s) to avoid the large learning curve that could be involved each time. To have an effective peer review process, it will be essential that any assumptions the agency used in its analyses are presented in a transparent manner. The subject matter experts should be given very specific tasks that fit with their areas of expertise, and should address not only the analysis, but the appropriateness of the data being used in the analysis.

The committee is aware that proper peer review can require considerable resources, and recommends that FSIS allocate the necessary resources to ensure it is conducted properly. In requests for resources for this activity, it should be clear that data analysis and its peer review are the reason for the request.

4. Do you believe it would be worthwhile to form an ongoing subcommittee to assist FSIS in evaluating various data issues? If so, please provide a rationale as to why it would be useful and recommendations on how it would be structured and should operate.

The committee believes that forming an ongoing subcommittee to address data issues and advise FSIS on the overall process as they undertake data projects would be useful and recommends doing so. It would like to ensure, however, that the subcommittee will not just be an additional step for FSIS to go through slowing down any data analysis process, and that the right people are involved, including a statistician, not just more people. The committee agrees that the expertise on NACMPI would substantially add to the expertise of the Agency, and that a subcommittee of NACMPI would form an integral part in the process. The subcommittee would also be able to identify and consult with external experts to add even greater value. One area in particular that the subcommittee could assist is problem definition. The timeframe for requests to the subcommittee, as well as the number of requests must be taken into account.