United States Department of Agriculture

Animal Health Statistical Surveys and Confidentiality
National Animal Health Monitoring System

For more than 20 years, the Animal and Plant Health Inspection Services' (APHIS) National Animal Health Monitoring System (NAHMS) has served as the primary source for national-level statistical data on animal health and management. As a unit within APHIS' Veterinary Services (VS) program, NAHMS conducts national commodity studies, develops study designs for epidemiologic investigations, and examines issues of interest through analysis of statistical data. NAHMS studies generate statistically valid data used to analyze the health of various animal species and commodity groups in the United States. These data and corresponding analyses are used by APHIS and VS to develop regulatory policy, to promote trade, and to inform industry and the general public.

When conducting a study, NAHMS often asks producers to voluntarily provide sensitive information about their management practices, animal health, and other operational issues related to on-farm production. These producers are understandably concerned about the confidentiality of the data collected since responses linked to an individual operation could have unintended consequences. Assuring producers that any information shared when participating in a NAHMS study will remain absolutely confidential is vital to encouraging voluntary participation and maintaining high response rates.

To better protect respondents' information, NAHMS applied for, and in March 2012 received, recognition as a statistical unit under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA). Enacted in 2002, CIPSEA provides a mechanism for Federal agencies to collect statistical information by (1) using a pledge of confidentiality, (2) designating agents to collect confidential data, and (3) preventing information from being disclosed in any manner that would allow a respondent to be individually identified. This process provides participants in NAHMS CIPSEA studies with strong confidentiality protection.

The CIPSEA statute is a (b) (3) statute under FOIA; confidential information covered under CIPSEA is exempt from release pursuant to a FOIA request. All information collected under CIPSEA is protected from distribution in a manner that could identify an individual respondent; see 44 U.S.C 3501 § 512(b)(1). Specifically, CIPSEA requires that data or information acquired by an agency under a pledge of confidentiality for exclusively statistical purposes shall not be disclosed by an agency in identifiable form for any use other than an exclusively statistical purpose except with the informed consent of the respondent. Data from an organization that is acquired for a statistical purpose will receive the same protection under CIPSEA.

This protection lasts for the life of the record and may only be altered with the respondent's written permission. Designation as a CIPSEA statistical agency or unit is permanent; there is no renewal process. Any CIPSEA information intentionally released that allows an individual to be identified is subject to a $250,000 fine or 5 years in prison or both.

As a recognized statistical unit under CIPSEA, NAHMS now has the ability to gather data from producers and perform studies that focus on a wider range of issues, such as:

- Collecting regionalization/zoning/compartmentalization data that will be used to provide vital information on the mitigation of international trade restrictions
- Performing anonymous sampling to address sensitive issues—such as antimicrobial resistance—in which regulatory action and trace backs are not required. This sampling will provide voluntary response data on prevalence, distribution, and risk factors that are difficult to obtain without strong confidentiality protections.
- Informing program and policy development using nationally representative statistical information
- Identifying appropriate disease-control strategies and assistance in regional disease-control efforts through rapidly deployed emergency epidemiologic investigations
- Partnering with second-party data providers to advance issues of mutual interest.

NAHMS has the necessary internal data management procedures and physical infrastructure to comply with CIPSEA regulations. A dedicated, access-controlled space serves as a secure data laboratory for analysis of confidential statistical data. All NAHMS personnel are trained annually in raw and electronic data handling methods under CIPSEA. Controls are in place to ensure that any link between respondents and the data provided is destroyed after the validation of field-collected data is completed. Reported information is closely monitored using the same methods as other statistical agencies to prevent an unintended disclosure of information.

All NAHMS CIPSEA activities provide the respondent with a pledge of confidentiality and state that the information collected will be used for statistical purposes only. This assurance is provided in writing prior to collecting information. All NAHMS activities are voluntary; it is up to the data provider to determine if participation is desirable.