

The review of our data standards document for data systems that contain Interstate Certificates of Veterinary Inspection (ICVI) and wish to exchange data with Veterinary Services (VS) data systems provided a number of comments that will be addressed. These standards are the first step in a process that will allow for easy and accurate data exchange between Federal data systems and those of our cooperating partners. The original standards document was published on the VS web space (http://www.aphis.usda.gov/animal_health/vs_ocio/data_standards.shtml). As animal health programs and terminology related to those programs matures, these standards may be modified to address those future needs.

These standards were derived from the standard set of data fields identified by the National Assembly of Chief Livestock Health Officials as necessary to comprise an official ICVI. Additionally, data tables were selected based on the established data tables in the Surveillance Collaborative Services (SCS) system. This harmonization between SCS and standard ICVI data was done in order for data to be readily extracted from an ICVI system and compared to data in the standardized SCS system, being deployed as a cooperative State/Federal surveillance system.

ICVI data is different and apart from the requirements necessary for animals to move interstate. These standards were developed in concert with the National Assembly's uniform ICVI, but the standard only addresses the data that may be found in an ICVI and does not address if the data actually meets a requirement for animals to move interstate. These standards simply establish the framework by which data exchange may occur in the future. Additional documents will establish and define data sharing agreements between VS and any cooperating third party. It will always be the responsibility of the importing State to determine if an individual ICVI meets any specific requirement for importation. Electronic certificates, using a uniform data standard will make it easier for States to review if those requirements were in fact met.

It is important to note that this document is very limited to only cover specific data elements. Interactions with existing systems, such as validation of accredited veterinarians via connection to the Veterinary Services Process Streamlining (VSPS) is not covered in this standard, but would be covered in future data sharing agreements. Thank you again for your interest in this important document .

Comment	Response
The standard needs to be adaptable with multiple data systems	Based on the simplicity of the standards, they are compatible with multiple data systems. The standard doesn't dictate anything other than a character type and a basic description of the data.
Vaccination data should not be required on an ICVI	Vaccination data may or may not be required in a specific State's ICVI and this standard doesn't require that field. The standard merely provides for a standard around that data when it exists on an ICVI.
Pleased to note that the standards include farmed aquatic species and allow for group identification	The standard is a living document and will change over time to accommodate other commodity groups as they become more prevalent in interstate commerce.
Suggest including finfish, crustaceans, mollusks and amphibians in Appendix 3, Animal Types.	The current set of data in each appendix will be reviewed and updated regularly.
APHIS should work with allied agencies to encourage use of ICVIs for aquatic animal movements	This document only covers a basic standard for ICVIs. Requirement of an ICVI for an animal species is beyond the scope of this standard.
The elements; age and disease status of state/zone, should be required elements	Not every ICVI requires age of the animal and disease status of the State/zone. Since this standard is generic in nature it would be problematic to require a State/zone status for a species or disease where such a status is not recognized. Additionally, some ICVIs are based on lots of animals, rather than individuals, so an age requirement would not be appropriate.
This is an important initiative	Veterinary Services agrees as to the importance of creating a basic standard with respect to the data on an ICVI. This basic standard will then serve as the basis for negotiating how data will be shared and transmitted between repositories of data.

Data element standards should be adopted by both paper and electronic based ICVIs	This standards document only applies to the data currently maintained within USDA, APHIS, VS data systems and does not apply beyond that scope.
Appendix 1, purpose codes, is not granular enough to determine if some movement requirements are met	Veterinary Services, in conjunction with our cooperators will continually evaluate the granularity of the data contained in the data tables located in the appendices of this document.
A mixed choice in the gender data element should not be included in that data table	Since ICVIs may be issued for lots of animals, rather than just individuals, a mixed gender choice may be necessary.
The veterinarian's license number should be required	Some ICVIs may be issued by non-veterinary personnel as per the requirements for that specific movement of animals and therefore a veterinary license number would not be available and shouldn't be required.
The description of test date should read; 'date test was conducted OR date sample was collected'	Veterinary Services agrees and will make that change in future versions of this document.
The document was developed using the wrong methodology and structure	This standards document was developed as a simple baseline, rather than a comprehensive approach to data within and around an ICVI. Veterinary Services feels that the methodology and structure of this document are flexible enough to give cooperators a basic understanding of the data housed within their data systems.
USDA should develop standards for ICVI content	This document only covers a basic standard for ICVIs. Requirement for the content of an ICVI is beyond the scope of this document.
USDA should develop standards for ICVI data format	This document only covers a basic data elements for ICVIs. Requirement for the specific format of the data of an ICVI is beyond the scope of this document.

<p>Unclear scope regarding specific uses of proposed standards</p>	<p>The scope of this document is to identify the basic data concepts that may be common to all ICVIs, touch on some basic requirements for a system that houses ICVI data, and share the common data tables that Veterinary Services currently uses to fill certain data fields. Anything else is beyond the scope of this document.</p>
<p>Standards need to identify and comply with existing industry standard requirements for interoperability.</p>	<p>Interoperability between data systems is beyond the scope of this document.</p>
<p>Existing sources for standards must be identified and evaluated.</p>	<p>Veterinary Services developed this standard based on data currently maintained in existing data investments. The purpose of the document is to facilitate the transfer of data between and within Veterinary Services data systems.</p>
<p>The document missed an opportunity to standardize data lists.</p>	<p>The data lists incorporated in the appendices of this document are based on the existing data tables in the current Veterinary Services data investments.</p>
<p>The sample XML script is not consistent with the data elements.</p>	<p>The XML script provided in the document was merely included as an example of how a sample data set could be transferred. Transfer of data between a Veterinary Services system and a system of a cooperator would require a specific data sharing agreement and a detailed method for data transfer.</p>
<p>The document is inconsistent with the final traceability rule</p>	<p>This document was reviewed by Veterinary Services personnel and found to be compatible with existing and proposed regulations.</p>
<p>The document fails to define security elements pertaining to ICVI data.</p>	<p>Security elements pertaining to ICVI data are beyond the scope of this document.</p>
<p>The standard fails to accommodate foreign addresses.</p>	<p>The ability to incorporate foreign addresses will be a part of future versions of this document.</p>

Latin binomial species names would better be considered as species codes than the current list of codes

The appendices include the data lists that are common to all Veterinary Services data systems today. A decision was made to use common descriptors for species rather than the proper Latin names as a way to ensure more accurate data entry from a field force not proficient in the proper scientific nomenclature.

Consider Withdrawing 'Policy Document'

The standard is a living document and will change over time to accommodate other commodity groups as they become more prevalent in interstate commerce. Since the VS Notice was only used to make the public aware of this document and it holds no regulatory weight whatsoever, a withdrawal is unnecessary.