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July 5, 2005

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Docket No. 05-015-1
Regulatory Analysis and Development, PPD
APHIS, Station 3C71
4700 River Road Unit 118
Riverdale, MD 20737-1238

Reference: Docket No. 05-015-1, NAIS Draft Strategic Plan and Draft Program Standards

Accenture LLP is pleased to submit our comments for the referenced Docket. Please see the attached file for our submittal.

If you have questions regarding our response, please contact me at the above number.

Sincerely,

ACCENTURE LLP

Martin W. Rodgers

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Response to:

The United States Department of Agriculture
Animal and Plant Health Inspection Service

Comments on the National Animal Identification System Draft Strategic Plan and Draft Program Standards

In reference to:

Docket No. 05-015-1

Submitted to:

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1. EXECUTIVE SUMMARY

The United States Department of Agriculture (USDA) seeks enhanced capabilities for identifying all exposed premises and animals within 48 hours of disease discovery. Accenture recommends a centralized and mandatory animal identification and tracking system that is administered by the Federal Government in coordination with relevant stakeholders.

Key Components of Accenture's Recommended Approach

- Rapid traceback of diseased animal movement and identification of exposed premises and animals within 48 hours
- Centralized, Web-based system with portal interfaces
- Flexibility to accommodate a wide-range of existing technology capabilities and business processes
- Restricted access to proprietary data to protect participants' privacy
- Federally administered on national basis
- Scaleable to accommodate multiple species and high data volume
- Efficient leveraging of existing systems for animal tracking, disaster response and management, and COOL compliance.

1.1 Our Understanding

Protecting the health and value of American agriculture and natural resources is the mission of USDA's Animal and Plant Health Inspection Service (APHIS). Through the administration of animal testing and identification led by its Veterinary Services (VS) program, APHIS detects and contains animal diseases and supports over $100 billion in domestic livestock. The success of VS initiatives such as the brucellosis eradication program has allowed APHIS to reduce or phase out some traditional methods used to track the movement of diseased animals (*e.g.,* back tags for identification and ear tattoo for vaccination).

Current public health and economic issues, however, suggest the need for a more robust, efficient, and nationwide animal tracking system. According to the United States Animal Health Association (USAHA), more than two-thirds of newly emerging and re-emerging diseases in people are zoonotic. Most prominently, the 2003 incident of bovine spongiform encephalopathy (*i.e.,* BSE or "mad cow disease") in Washington and the recent discovery of infection in a native-born cow in Texas have focused national attention on health risks posed by animal diseases. Further, the September 11, 2001 attacks have renewed public interest in an efficient response to bioterrorism, particularly the rapid tracing of infected animals to limit the scope and expense of an outbreak.

While not all animal diseases are linked to human deaths, they nevertheless diminish American agricultural trade. The first case of BSE in the United States resulted in the banning of American beef by 53 countries and an estimated annual loss of $4 billion and the second case renewed trade bans from key importers. Even diseases that are clinically proven to threaten human health like scrapie, the sheep and goat counterpart of BSE, can negatively impact the industry by $20 to $25 million in lost sales and increased production and disposal costs. Until American livestock and animal products are declared free of major diseases by the Office International des Epizooties (OIE), most countries will continue to prohibit or restrict the importation of that particular livestock and related animal products from America.

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1.2 The National Animal Identification System

To fully meet public health needs and to strengthen consumer confidence in the safety of the U.S food supply, APHIS is implementing a National Animal Identification System (NAIS) that expands upon and standardizes current efforts to trace back the movement of infected animals and quickly identifies exposed premises and animals and other animals of interest within 48 hours of discovery for effective control and prevention of disease outbreaks. NAIS will establish, over time, an information structure with real-time reporting capabilities that incorporates the following key components:

- Premises identification, to record all locations that manage or hold livestock;
- Animal identification, to uniquely identify individual animals and groups/lots; and
- Animal tracking, to record the movement and exposure of animals to premises and each other.

This effort builds upon the Animal Health Protection Act of 2002, which authorizes APHIS to respond effectively and efficiently to modern threats to the health and viability of U.S. animal agriculture, from farm to table. Further, as an integral part of a newly expanded preparedness and response program that provides early detection and mitigation in emergency and disaster situations, NAIS supports Federal security goals including the Homeland Security Presidential Directive 9 (HSPD-9), the Agricultural Bioterrorism Protection Act, and the National Response Plan's Emergency Support Function 11.

1.3 New Challenges for Implementation

When developing the overall vision, APHIS should consider and incorporate a number of stakeholder needs into the final NAIS Strategic Plan and Program Standards. In seeking to protect public health, APHIS must also consider the privacy needs of industry partners and protect their personal or proprietary information from open disclosure or other misuse that may expose them to competitive disadvantage or unfair financial or legal liabilities. To this end, APHIS must inspire public confidence in the security of NAIS and provide only necessary officials with the authority to request and view this data.

Successful implementation of NAIS further requires that AHIS address existing business processes and varying technical capabilities. To provide health officials with immediate, reliable, and uninterrupted access to essential data sharing successful, NAIS should have uniform data standards and compatible systems. Simultaneously, the overall architecture should be adaptable to changing information needs and scaleable for industry growth.

Finally, APHIS needs a transparent and defensible funding strategy that is supported by data analysis and driven by stakeholder requirements. It should describe program participation costs, delineate responsibility for specific costs, and illustrate the benefits of participation.

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2. OUR APPROACH

Accenture's approach is founded upon our extensive experience with both the business and technology aspects of animal identification and tracking. Based on our expertise in piloting Radio Frequency Identification (RFID) technologies to support Federal security needs and our work with similar animal tagging and tracking requirements in the European Union (EU), we recommend a centralized, Web-based system that is secure, flexible, and efficient. This public system will make available accurate and timely data in a confidential and cost effective manner that protects both large and small industry participants. As a result, it will meet APHIS' goal of enabling health officials to trace back the movement of a diseased animal within 48 hours and to identify accurately exposed livestock and premises for containment.

Our recommended approach is designed to deliver the following benefits, as described in *Figure 1.1*, for key stakeholders.

Figure 1.1 – Benefits to Key Stakeholders

Stakeholder	Benefits
Producer	• Reduced data capture labor and errors • Removal of paper burden • Online maintenance of herd register • Improved herd management
Veterinary	• Easy reporting of disease treatment • Full access to animal case history (including pathology)
USDA	• Remove burden of data entry and allow real-time analysis • Increased received data accuracy • Channel to introduce new tracking capabilities (*e.g.* animal feed)
Inspector	• Herd register verification prior to inspection • On-site access to animal history and movements • Removed manual inspection of herd register
Producers, Export Points	• Immediate reporting of animal movement / transaction • Improved operation and efficiency • Reduced fraud
Meat Producer, Retailer, Consumer	• Full visibility and assurance of meat quality and origin • Increased confidence in product

2.1 NAIS Architecture

We envision NAIS to be a single, consolidated system, with a portal interface that provides animal identification and tracking information to producer and nonproducer participants (*e.g.*, buyers, sellers, animal health officials, etc) based on their approved level of access. Users can register through the portal and access roles could be granted based on the user's needs or defined program requirements. Depending on their authorized level of access and type of role in NAIS, business and industry users may enroll as a premises, seller, or a buyer who will move animals

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from one premises to another location. Other non-industry participants such as animal health officials or technology service provider may register as necessary to comply with NAIS.

NAIS can be built on a flexible multi-tiered architecture that would dis-aggregate the business rules and user displays from the underlying data structure. To enable flexible communication and reporting, the portal can have multiple, standardized interfaces for inputting and transferring information from disparate sources into a few, streamlined channels. Web-services, data interchanges based on Federally-accepted Extensible Markup Language (XML), and Web-front ends allow users to submit information to NAIS through existing animal identification and tracking systems or manually, depending on user needs or technical limitations.

Underlying this system is a centralized, data structure (*e.g.,* repository or warehouse) that receives animal and premises information through batch submissions or real time updates. Key to meeting APHIS' 48 hour tracking goal, this data structure is still flexible enough to allow both producer and nonproducer participants to manage their respective data. Through a multi-layered security structure, each user's access to animal and premises data in the database is limited by his authorized role and "need to know," as determined by APHIS in coordination with key stakeholders. This access restriction serves to protect the privacy and confidentiality of participants' data.

2.2 Program Coordination

To minimize redundant effort and cost, we recommend that APHIS leverage existing systems for animal tracking and incident management. Depending on each existing system's complexity and cost, this may require a conversion process to translate the data from existing system formats to an NAIS-compatible file. While some effort may be involved in developing a mapping schema and conversion program or in testing the extraction process, this will help establish a uniform and interchangeable data set. Further, it will avoid duplicative system development and information silos.

Within USDA, APHIS should leverage USDA's participation in the Geosptial One Stop Presidential Initiative, which is still in the early stages of development, to enhance NAIS ability to track incidents geographically. And, as a cost-saving measure, APHIS should coordinate with the Agricultural Marketing Service (AMS) to use NAIS, which incorporates animals' birthplace information, to support the Country of Origin Labeling (COOL) program for meats and other agricultural commodities.

Across the Federal government, APHIS should coordinate with disaster management initiatives such as the Document Management Information System (DMIS) and other Homeland Security information systems. Internationally, APHIS should coordinate with the EU, Australia, and Canada among others, to develop interchangeable data standards. Overall, the design, development, and deployment of NAIS will likely involve complex, vertical coordination between Federal, State, and local health officials as well as horizontally across the supply chain from producers to stockyard owners and meat packers.

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3. DRAFT STRATEGIC PLAN AND PROGRAM STANDARDS

3.1 The Draft Strategic Plan calls for making the entire system mandatory by January 2009. Is a mandatory identification program necessary to achieve a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs? Please explain why or why not.

A mandatory identification program is necessary to achieving a successful animal disease surveillance, monitoring, and response system to support Federal animal health programs. The draft Strategic Plan describes a comprehensive animal identification and tracking system that aims to "identify all animals and premsies that have had contact with a foreign or domestic animal disease of concern within 48 hours after discovery." To realize this goal, animal health officials must have accurate and complete data about the premises, the animal, and its movement across each premises.

Given the fixed and marginal costs associated with implementing this tracking system including tagging supplies, IT infrastructure, and labor for tagging and data entry, a number of producers and nonproducers may opt out of a voluntary program for financial reasons. This is more probable with smaller businesses that cannot effectively leverage economies of scale to reduce their cost per animal of identification and tracking.

Allowing program participation to be optional will effectively eliminate the speed, effectiveness, and accuracy of the tracking system. Likely, NAIS repositories may not have critical data available about every premises or animal. In the event of disease outbreak, APHIS officials may not have complete records of an infected animal's movement across premises or be able to identify all exposes premises and animals. In this situation, officials will have to conduct manual investigation, losing valuable time and resources that may be better directed towards containment and eradication efforts. Only by requiring participation will APHIS obtain the quality and quantity of data it needs to make accurate and efficient decisions on identifying and quarantining all exposed

3.2 In the current Draft Strategic Plan, the NAIS would require that producers be responsible for having their animals identified before the animals move to a premises where they are to be commingled with other animals, such as a sale barn. At what point and how should compliance be ensured? For example, should market managers, fair managers, etc., be responsible for ensuring compliance with this requirement before animals are unloaded at their facility or event? Please give the reasons for your response.

To ensure compliance with NAIS' requirements, producers should have their animals identified before the the animals move to a premises where they are to be commingled with other animals such as a sale barn. However, the market managers and fair managers should be responsible for compliance before animals are unloaded at their facility or event. Then, each receiver of the livestock (whether salebarn, stockyard, or buyer) should tracking animals in the public database as they move to the new premises. Due to mingling that may occur at the sale barn prior to an auction or event, it would be impracticable to wait until after the sale to meet tagging

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requirements. Independent auditors, likely at the state-level, should be held responsible for overall NAIS compliance.

3.3 In regard to cattle, individual identification would be achieved with an AIN tag that would be attached to the animal's left ear. It is acknowledged that some producers do not have the facilities to tag their animals; thus, the Draft Program Standards document contains an option for tagging sites, which are authorized premises where owners or persons responsible for cattle could have the cattle sent to have AIN tags applied. Do you think this is a viable option, *i.e.,* can markets or other locations successfully provide this service to producers who are unable to tag their cattle at their farms? Please give the reasons for your response.

The Draft Program Standards document identifies two options for tagging animals: tagging sites and tagging services. Both are viable options, but there are some additional logistical considerations for tagging sites.

Producers may find difficulty in transporting their livestock to a tagging facility. The requirement to physically bring livestock to a tagging site may prove to be too burdensome for some owners. The proximity of the closest site and the quantity of livestock being tagged would play a large role in affecting producer compliance. The capital and time costs incurred by the transportation of animals would negatively impact producer compliance.

Another logistical concern with the transportation of animals is the unintentional commingling of animals. As livestock arrive from various producers, it would be essential to maintain separation between groups, especially before being tagged. This poses questions about how large tagging sites would need to be in order to provide the pre-tagging isolation required.

In order to more effectively gain producer compliance, it would be wise to establish the tagging sites that would provide a producer the option of transporting animals or gaining the skills and tools to tag animals at their respective sites. The tagging site could serve as a facility for the owners to obtain AIN tags, register premises, as well as gain general information and instruction about the overall process and required tagging methods.

The second tagging option, tagging services, may prove to be a better solution overall. Rather than requiring producers to obtain the education and tools to tag their animals, mobile tagging units could be utilized to perform the tagging at the owner's premises. This would eliminate the costs associated with transporting the animals and still provide tagging aid and instruction to the owner. It will also reduce the demand for and cost of tagging sites as these functions are outsourced to these service providers.

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3.4 The current Draft Strategic Plan does not specify how compliance with identification and movement reporting requirements will be achieved when the sale is direct between a buyer and seller (or through their agents). In what manner should compliance with these requirements be achieved? Who should be responsible for meeting these requirements? How can these types of transactions be inputted into the NAIS to obtain the necessary information in the least costly, most effective manner?

Overall compliance with identification and movement reporting requirements should be the responsibility of the party receiving the animal (in this case the buyer). In order to ensure that all animal movements are recorded, APHIS should require the initial producer to identify both the initial premises and the animal and to properly tag the animal. At the time of sale, the buyer is responsible for verifying that the animal is properly identified and tagged before it is transferred to the new premises. If the seller has not complied with NAIS regulations, then it is the buyer's responsibility to decline the animal.

Upon receipt of the animal and transfer to a new premises, the buyer must be responsible for ensuring the animal is properly tagged and that new premises information has been reported to the NAIS database. If each buyer adds that movement to the animals AIN reference, then an accurate record of the movements should be consistently maintained.

This approach allows transactions to be inputted into the NAIS to obtain the necessary information in the least costly, and most effective manner. The buyer cannot be responsible for the background research and tracking of an animal before it arrives on his property. The seller cannot and should not be responsible for tracking the animal after receipt by the buyer. In this situation, both the buyer and the seller are legally and financially obligated for compliance, but specifically for different aspects of this compliance.

3.5 USDA suggests that animals should be identified anytime prior to entering commerce or being commingled with animals from other premises. Is this recommendation adequate to achieve timely trace back capabilities to support animal health programs or should a timeframe (age limit) for identifying animals be considered? Please give the reasons for your response.

USDA's recommendation that animals be identified anytime prior to entering commerce or being commingled with animals from other premises is adquate to achieve timely trace back capabilities and support animal health programs.

Effective tracing and quarantining of suspect animals require that APHIS understands both the identity of the animals and their exposure to each other at every premise. Based on our collective experiences, we believe the foundation of this traceback of diseased animal movement and identification of exposed animals is the premises. The key is that all new animals to the premises are tagged, which has been established as a requirement. If there is an outbreak or traceback to a premises then, at that time, all untagged animals *(i.e.,* born on the premises) could be tagged to link them to that "premises of interest." If an animal was part of the premises but had moved off prior to a traceback, its record would exist in NAIS due to the requirement to tag the animal when the movement took place.

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Based on the current situation, an age limit is not necessary as long as the individual animal can be traced back to its group or lot. Of course, earlier tagging would provide more detailed data to aid in the traceback and may be useful if officials needed to identify the animal's age. In incidents like the Texas BSE-infected cow where the cow's age identified it as part of a group fed with cattle parts before a 1997 ban was established, officials can use this detailed data to identify other cattle from the same group. However, as long as individual animals can be traced back to their groups (as provided for in the current NAIS Program Standards), age limits should not be required.

Further, while USDA's suggestion of tagging animals prior to entering commerce would make sense for small ranches or those producers who only handle a small part of the production process, larger producers with production line processes will most likely commingle livestock at a much higher rate. As a result, there will be a multitude of opportunities for infect animals to mix with uninfected animals long before the animals would require tagging. In this case, it is advisable and likely in the best interest of the producer (although not necessary) to tag each animal or group before the first instance of commingling even if it has not left the premises.

3.6 Are the timelines for implementing the NAIS, as discussed in the Draft Strategic Plan, realistic, too aggressive (*i.e.,* allow too little time), or not aggressive enough (*i.e.,* do not ensure that the NAIS will be implemented in a timely manner)? Please give the reasons for your response.

The dates for implementing the NAIS may be somewhat aggressive. A central database and user interface could most likely be established within the timeframe listed in the Draft Strategic Plan. The timeline discussed in the Draft Strategic Plan for implementation across the country may not be sufficient. States should take over the responsibility of ensuring the migration of animal tracking standards to those of the NAIS. There will most likely have to be a phased roll in of targeted implementation goals over a period of time before one hundred percent participation can be assured.

3.7 Should requirements for all species be implemented within the same timelines, or should some flexibility be allowed? Please give the reasons for your response.

Some flexibility should be allowed in the timelines for all species to be incorporated into the system. It would be wise to pilot the system for several, carefully selected species so that APHIS can refine NAIS capabilities and incorporate user feedback into system improvements and s incorporated to improve and enhance the system, new species can be added. At the same time, however, APHIS must design the system architecture for easy addition of new species and the business processes surrounding their identification and tracking. Species should be added to the requirements based on a prioritization of public health concerns related to that species so that subject to the timeframe listed in the Draft Strategic Plan.

3.8 What are the most cost-effective and efficient ways for submitting information to the database (entered via the Internet, file transfer from a herd-management computer system, mail, phone, third-party submission of data)? Does the type of entity (*e.g.,* producer, market, slaughterhouse), the size of the entity, or other factors make some

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methods for information submission more or less practical, costly, or efficient? Please provide supporting information if possible.

Given the ubiquity of the Internet in today's world, online submissions would provide the most cost-effective method for submitting information to the National Animal Identification System. The Internet is now affordable and accessible from almost everywhere in the US, be it by broadband, dial-up, or satellite. This medium provides practicality and cost efficiency across all different types of entities.

Two primary methods can be utilized for online submissions. The first and more robust method involves the user entering data into a Web-based form or application. The advantage of this is real-time information updates. As soon as the user has entered in the necessary information into the application and hits Submit, that information can instantaneously be updated to the state or national system. An enhanced Web application may provide features that allow a user to save or copy personalized Web forms in a "MyPremises" type portal functionality. This may be especially useful when registering for AINs on many similar animals so as to reduce the amount of redundant data entry.

Large existing operations could create or integrate their existing applications via some type of Web-service or XML data interchange. By doing this, the producer or rancher may use their current tracking system and submit the required data into NAIS via these standardized interfaces over the Internet.

The other online option allows the user to download a form, fill it out, and then email it somewhere where an employee would enter that information into the system for the user. This option is advantageous if the user has limited Internet access or would prefer to fill in the form offline at his or her leisure. Pursuing this option, however, would eliminate the real-time update capability that would make the system more effective.

The rapid growth in broadband technology is a compelling reason to favor Internet submissions over other forms of data submission. As WiMax type broadband and 3-D cellular network technologies emerge, they will make online access from the field an even more feasible scenario. Users will then be able to directly enter information into their portable devices for instantaneous updates. Coupled with RFID tag readers, more efficient, automated, system updates can be a reality.

In cases where the Internet is not available, a phone based Interactive Voice Response (IVR) system is the next best option. IVR provides the flexibility for an owner to even make calls from his or her cell phone out in the field. Even though, it might be slower than entering information into a Web application, it still provides a cost effective real time method for updating system information.

The second phone based option includes setting up call centers where customers can call in their request for premises or animal registration and a human resource at the other end would input the data directly into the system. This option is more costly, but would provide support for those users who prefer human interaction.

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3.9 We are aware that many producers are concerned about the confidentiality of the information collected in the NAIS. Given the information identified in the draft documents, what specific information do you believe should be protected from disclosure and why?

All producer or participant-specific information in NAIS should be protected from disclosure unless a trigger event or outbreak necessitates the retrieval of information from NAIS. In tracking private property, APHIS should seek only to protect public health and must restrict access and secure this information accordingly. Open disclosure of private or proprietary data may allow for the misuse by competitors and expose producers and industry partners to disadvantage in the marketplace. Especial care must be taken in distributing information about disease outbreaks and incidents so that participants are not exposed or additional, undue financial or legal liabilities. APHIS should release only basic information about the diseased animals and its movement to the public. This information should not identify the specific producer or premises and all other information about the animal, premises, lot size, etc should remain protected. As previously stated, APHIS should make available or restrict access to specific data sets for each user (*i.e.,* producer and nonproducer participants) in accordanced with their authorized roles.

To further inspire public confidence in the confidentiality and integrity of NAIS data, APHIS should mandate that all systems and components used in this program to comply with Federal security requirements including the Federal Information Security Management Act (FISMA) and complete the Federal certification and accreditation process. Data transmission should be in accordance with the Federal E-Authentication initiative.

3.10 The NAIS as planned would require States, producers, and other participating entities to provide information and develop and maintain records. How could we best minimize the burden associated with these requirements? For example, should both the seller and the buyer of a specific group of animals report the movement of the animals, or is reporting by one party adequate?

To minimize the burden on States, producers and other participating entities to provide information and develop and maintain records, APHIS should to make NAIS development and deployment standardized, simple, and cost-effective. Because a number of these groups already tag and identify animals using a previously developed and implemented system, it is essential that the NAIS establish system and data standards for interoperability and data interchange. Because producers and other industry participants in NAIS will focus on the capital costs of implementing a new system and integrating it with their operations, APHIS should provide technical expertise and support for a seamless transition to the new public database. This can be accomplished by evaluating new technologies and implementing systems with interoperable modules and components that may be reusable by other participants. APHIS may further wish to provide financial assistance (See our response in Section 4.1 for further discussion).

In addition to technological support, APHIS should look to minimize requirements where possible. For example, APHIS may eliminate unnecessary data entry by limiting required

information and delineating compliance responsibility as discussed in Section 3.5. Requiring animal tracking and validation of data by both the seller and the buyer is not necessary and may burden both parties with time-consuming and costly verification. That is, it will be difficult for the seller to track the animal once it is delivered to the buyer at the new premises and equally difficult for the buyer to verify that all the locations that the animal had been kept at prior to its sale and delivery. Further, these guidelines must also provide clear and simple rules for what constitutes a change of location and commingling so as not to confuse users.

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4. UTILITY OF PRIVATELY MANAGED DATABASES

4.1 How should a private database system be funded? Please give reasons for your response.

Given the need for speed and accuracy in data collection and dissemination, a publicly funded and APHIS governed central data repository should be established to collect all relevant data nationwide. Should individual private firms or States wish to maintain separate databases/ interfaces in order to collect more comprehensive data or increase productivity, the systems could be certified and integrated with the NAIS architecture. Those databases, however, must fit within the uniform standards of the central data repository and remain compatible with that database via real-time or batch update capabilities. Private databases, defined as any system created by States, companies, or organizations outside of the official APHIS NAIS system, should be created solely through private funding. For private systems already in use, monetary incentives could be provided by the government to facilitate compliance with the new guidelines.

4.2 Should the NAIS allow for multiple privately managed databases? Please explain why or why not.

While the NAIS should allow private databases to interface with the public system, it should not depend on multiple privately managed databases to alone provide the necessary data/ functionality expected from this project. It is recognized that individual databases in many ways improve productivity and data collection at the user level. Private databases and tracking systems are already under development at the state level and within individual companies and organizations. The NAIS cannot rely on these multiple databases to alone form a fast and reliable method to report on animal tracking in the 48 hour window. The primary concern expressed by APHIS in developing the NAIS, is the ability to track animals, herds of animals, and producers/ non-producers in an effort to stem the passage of dangerous diseases among livestock. By having a unique, accessible and comprehensive database, a diseased animal and other livestock associated with that animal may be tracked, quarantined, and tested in a timely fashion. Should the NAIS rely on multiple privately managed databases for tracking animals, the speed, accuracy, and integrity of data dissemination may be compromised.

4.3 Should a public (government) system be made available as well as a privately managed system so that producers would have a choice? Please give the reasons for your response.

Given the need for timely, accurate, and correct data updates, it is essential that there be one central repository for animal tracking data gathered by the NAIS. Given the need for data integrity and security, it is wise for this central database to be administered by the government. Since the Federal government will create a universal interface to allow for data entry and retrieval, private firms and or large aggregates can create or integrate existing systems so long as they utilize the specified guidelines dictated by the NAIS. These would include the use of standardized Animal Identification Numbers, Premises ID's, and real-time or batch update capabilities.

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4.4 Should a privately managed system include all species? Please give reasons for your response.

Whichever direction NAIS chooses, private or public funding, the NAIS should be built in a flexible format that would enable all species to be included. It is essential that the NAIS universal data structure should be designed in a way that would facilitate the addition of all species to the repository. The initial phases of the roll-out of the system should focus on the cattle species as a pilot to ensure understanding, acceptance, and full-roll out. Once NAIS has been updated with recommended changes, new species could be implemented into the system.

4.5 Would either system work equally well at the state level? Please explain why or why not.

Given the frequency in which animals cross between States during the raising and production phases, it would be unwise to depend on States to manage overall animal tracking. It would be extraordinarily difficult and expensive to create 50 unique databases that could provide the accuracy and speed of data processing and dissemination required by NAIS. The goal of NAIS should be to provide a universal interface that reflects the needs of producers and States alike. Should States choose to update a national database through a private or public state-based system, they could provide that functionality.

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