

US EPA ARCHIVE DOCUMENT

PPDC Incident Work Group

Meeting Minutes

February 18, 2016

Attendance

Capt. Geoffrey Calvert, Centers for Disease Control and Prevention	Tom Delaney Professional Landcare Network
Robyn Gilden, PhD, RN University of Maryland School of Nursing	Beth Law Consumer Specialty Products Assn.
Valentin Sanchez Oregon Law Center	Donnie Taylor Agricultural Retailers Association
Michel Oriel California Department of Pesticide Regulations	Cindy Palmer American Birds Conservancy
John Peckham, Program Manager Minnesota Department of Agriculture	Cheryl Cleveland BASF Corp
Jeffrey Rogers Virginia Department of Agriculture and Consumer Services	Bob Rosenberg National Pest Management Assn.
Gary Wilkinson Scotts	Rick Kingston SafetyCall
Doug Hanks National Potato Council	Elliot Gordon Elliot Gordon Consulting (for ADAMA)
Amy Mysz EPA Region 5	Helene Ambrozino EPA Office of Compliance
OPP people in room Jackie Mosby, Melissa Panger, Rich Dumas, Nick Mastrola, Coleen Rossmeisl, and Bob Miller	

1. Cheryl Cleveland commented that it was hard to discuss specific data elements divorced from how data will be collected, codified, and released. Melissa and Rich replied with a general description of how incident data are collected and used. They noted that we reviewed the data elements currently used in other incident databases and incident sources when we developed our draft data element list. Persons who want more information about the collection and use of incident data by EPA are directed to EPA's web site on pesticide incidents:
<http://www.epa.gov/pesticide-incidents>.
2. Rick Kingston noted that the majority of data will likely be collected by the registrants and passed on to EPA. He also questioned if the EPA would have enough resources to fill in even the "filled by EPA" fields for all incidents. EPA notes that policies may be implemented to prioritize incidents and complete the "filled by EPA" fields only for certain subsets of incidents rather than for every one.
3. Tom Delany, recommend including a disclaimer to warn against misuse of the information. Melissa assured the team that this will take place. Also concerned about how the person reporting the incident would be recorded. As has been previously discussed, collection of submitter and contact information will be done carefully to avoid collection of PPI information, or to properly protect such information from being released to the public.
4. It was also noted that vets often will have difficulty in determining if there was misuse of the pesticide. It was recommend to include "suspected misuse" as an option. This will be done.

Also, Melissa noted that EPA recognizes that this field will probably be recorded as “uncertain” for the majority of incidents.

5. The team then reviewed the proposed data elements for incidents of adverse effects to pets and other domestic animals. The team’s comments are captured in the attached table.

Proposed Data Elements for Pesticide Incidents
Comments from PPDC
Pets and Domestic Animals
February 4, 2016

Pet and Domestic Animal Incidents

Subgroup	Data Element	Description	Comments
General Fields			
Contact Information	Submitter Name	Name and title of the individual submitting the incident report to the EPA.	Some incident reporters would like to allow anonymous reporting as some (e.g. farm workers) may not feel comfortable providing their name. This would mean making this field optional, or allowing submitter to identify themselves by entering a general title (e.g., "farm worker") when they don't want to give their name.
	Submitter Organization	For 6(a)(2) reporting, the name of the registrant submitting the incident report. For other reporting, name of the entity (e.g., government agency, nonprofit organization, or academic institution) that is submitting the incident report to the EPA. If it is a private citizen, enter "private citizen."	OK
	Submitter Category	Category of the entity submitting the report. ("Registrant" for 6(a)(2) reports)	OK
	Submitter Address	Address of the individual reporting the incident to the Registrant or Registrant Agent.	For all contact information fields: You need to be very cautious about collecting names of individuals. CDC does not collect names and contact information of individuals (PPI) because of privacy concerns.
	Submitter Phone Number	Phone number of the individual reporting the incident to the Registrant or Registrant Agent.	OK
	Submitter Email	Email of the individual reporting the incident to the Registrant or Registrant Agent.	OK
	Report Date	Date that the incident report was prepared.	Will not be captured electronically? Submission date is automatic. Report may be prepared some time before it is submitted, so report date may be different than submission date. Make sure that you do not record duplicate records for the same incident.

Subgroup	Data Element	Description	Comments
	Contact Name	Contact information for a person, other than the submitter, who may be contacted for obtaining further information on the incident. This may be the complainant, a physician, a veterinarian, or a wildlife biologist.	1. You need to be very cautious about collecting names of individuals. CDC does not collect names and contact information of individuals (PPI) because of privacy concerns. 2. You may want to not capture PPI of contacts in this database, but instead rely on the submitter to hold that information. The user would then contact the submitter if when they need this private contact information. 3. You may want to restrict this to public information, such as contact information for the office of a physician's practice.
Incident Data	Incident Type	Human.	OK
	Reporter's Case Number	Non-OPP case number from submitter for the incident (if exists).	OK
	Incident Location	The location where the pesticide exposure is believed to have occurred. Location fields will include Town/City, County/Province, State, and Country.	Location data may pose a problem because of privacy concerns. For CDC cases, some incident reporters are unwilling to provide location information any more specific than the state level.
	GPS Coordinates	Latitude and longitude coordinate of the incident location.	1. Make optional. May have major privacy concerns for human incidents. 2. May not be important for human incidents as for ecological incidents. 3. May want to keep this out of the database for humans and rely on the submitter to keep this information, if it is needed. 4. Probably not applicable for pet/domestic animal incidents.
	Exposure Date (Start)	Date of the exposure, or if more than one day, the start date of the exposure.	1. State reports usually don't include exposure date, only the incident date. 2. CDC records exposure date as well as incident date. It is important since health effects may occur well after exposure.
	Exposure Date (End)	End date range of the exposure.	OK
	Incident Date (Start)	Date of the observed adverse effects, or if more than one day, the start date of the observed adverse effects.	OK
	Incident Date (End)	End date of the observed adverse effects.	End date may not be applicable to human health incidents. The date when people no longer suffer adverse effects is generally unknown.
	Date Comment	Use to provide information about the timing of the incident when exact dates	OK

Subgroup	Data Element	Description	Comments
		are not known. (Example: "Early April"). May also be used for comments concerning the start and end dates.	
	Incident Awareness Date	Date when the registrant, or registrant agent, became aware of the incident. Not applicable to non-6(a)(2) incident reporting.	OK
	Notification (Yes/No)	Indicates if the incident was reported to a government agency other than the EPA, such as a state government office.	OK, but you may also want to know if it was reported to a nongovernment organization (NGO), such as the Poison Control Center. May want to modify the description to include notification to NGOs
	Notification (Text Field)	Identifies the federal, state, or regional government office (other than EPA) that was notified of this incident.	1. The database should capture the date of notification and the case number as well. 2. Should include reporting to NGOs, such as the poison control center, as well as government agencies. 3. It would be important to know if an incident was reported to a health department. 4. Add notification to Poison Control Center 5. May also want to ask for the given opinion on the link between the cause and effects. May want to add this as a separate comment field
	Part of a Study?	Indicates if the incident part of a larger study? An example is ongoing worker exposure studies.	1. Seems unlikely that you would get many of these incidents. 2. Does not seem like critical information. 3. If one answers "yes", then you probably would want to prompt a text field to enter a description of the study.
	Status (New or Update)	Indicates if the report is for a new incident or an update to a previously submitted incident.	OK
Number Affected	Number Affected	The number of persons having the adverse effect. Enter the exact number.	It was noted that a relational database structure is needed. Much of the following fields are for a single individual. Therefore if there is more than one person affected, you would need a one-to-many relationship to capture the health data for each individual affected.
Pesticide Information	EPA Registration No.	EPA Product Registration Number. Include the 1-6 digit manufacturer number and the 1-5 digit product identification number. Separate the two numbers with a hyphen. Distributor's number, if applicable, is entered separately.	1. The product name may be more available than the EPA Reg. No. Needs to be optional since some reporters will not know the Reg. No. 2. Product names can be ambiguous; different products sometimes have the same name.

Subgroup	Data Element	Description	Comments
			3. The Reg No. is preferred because incident reporters do not always report the full, precise product name. 4. It is important to know the exact label of the product used because different labels may have different labels use instructions. 5. Farm workers would find it easier to record the Reg. No. than the product name. They can get the Reg. No. from the pesticide use records.
	Canadian Reg. No.	Canadian product registration number (for Canadian incidents only)	OK
	Product Name	Product name. Should include the complete trade name, including codes describing the formulation, and any description of pesticide type. Example: "Propazine 80W Herbicide"	1. Is very critical to identify the product when known. 2. The database will need relational structure to allow more than one product to be entered. 3. You may want to instruct people to enter the pesticide type when the exact product is unknown (e.g, "herbicide" or "rodenticide.") Alternatively, you may want to have a separate field for pesticide type.
	Product Formulation	Formulation type of the product as purchased.	OK
	Formulation as Applied	Formulation type of the product when it was applied (e.g. diluted solution, granule, dust, etc.)	OK
	Active Ingredient	Common name of the active ingredient to which the affected person or other organism was exposed.	Will want to make the input system auto-populate or give default values when possible. For example, once you enter the product, the active ingredients should populated automatically.
	Active Ingredient Comment	Information on the identity of the active ingredient when the specific ingredient cannot be identified or is not on the drop-down list. Enter the ingredient name if known but is not on the list. If the ingredient identity is unknown, enter the known or suspected chemical class or classes (e.g., "carbamate" or "anticoagulant rodenticide") or enter "unknown."	OK
	Toxicity class	Signal word (Danger, Warning, or Caution) for acute oral toxicity class of the active ingredient.	Suggested added field. Should be obtained from a look-up table based on the ingredient ID. Do we want to record the signal word or the toxicity class (I, II, III, or IV)?
	Restricted Use Product	Indicates if the product is a restricted use product	OK

Subgroup	Data Element	Description	Comments
Application Information	Application Site Category	General category of application site (Agricultural, Residential, Commercial, etc.)	1. Consider adding additional categories, such as "Golf Course" or "Right-of-way" (We may want to add "Recreational" for sites such as golf courses, and "Municipal" or "Government" for right-of-way sites such as roads) 2. Consider adding "Labor Camp"
	Application Site	Description of the site where the pesticide product was applied. If it is an agricultural site, identify the crop. If an accidental exposure, enter the site of the exposure. If applied to an animal, enter "Animal treatment".	OK
	Application Method	Description of method used to apply the pesticide. Examples include aerial spraying, ground spraying, granular application, and bait placement.	1. Recommend being more specific on this to include the general type of equipment used (e.g. boom sprayer, backpack sprayer, etc.) 2. We may want to use Smart Label fields for this. They have has one field for general method type and a second field for more specific type.
	Application method specific	Description of the specific type of method used to apply the pesticide, indicating the general type of equipment used.	Suggested added field.
	Application Rate	Rate of the application of product, if known. Enter value and units.	1. Add "as applied" to definition. 2. Note that this is sometimes not applicable, for example with spills or pesticide loading exposure. Modify the definition accordingly.
	Misuse	Yes/No/Uncertain. Indicates if the manner the product was used was in violation of the label.	For human health, person reporting may not have good judgement of misuse. May not be qualified. More useful when reported by registrant or state lead agency. Question if it is worth including on form filled out by general public. May need to qualify this field as "misuse as reported."
	Misuse Comment	For misuse cases, comment on evidence indicating misuse of the product.	Important
	Applicator Certification	Yes/No. Indicates if product was applied by, or under the supervision of, a certified applicator.	OK
Incident Description	Incident Description	Description of what happened, including a general description of the suspected pesticide exposure and the adverse effects/symptoms observed. Also may include other important details not captured by the other data fields.	OK. Very important
	Incident Site or Exposure Site	Description of the site where the person or organism was exposed to the pesticide, or if unknown, enter where symptoms,	Remove "or organism" for human health. Consider renaming "exposure site"

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		mortality, or other adverse effects were observed.	Site where effects happened is also important.
	Route of Exposure	Primary the route of exposure of individuals affected (e.g., oral, dermal, inhalation, or ocular)	OK
	Exposure Pathway	The route of transport of the pesticide from the site of application to the affected organism (e.g., spray drift, run-off, volatilization, secondary exposure).	Change “organism” to “person”
Lab Report	Lab Report Title	Title or description of the laboratory report(s) that the submitter attaches or encloses with the incident report submitted to the EPA.	OK
	Lab Report Number	Report number for the laboratory report.	OK
Unique Fields for Pets and Domestic Animals			
Animal Description	Case ID	ID code that identifies the case, i.e., the individual animal affected. May use the code given in the incident report, otherwise assign sequential numbers.	OK, but should be in general elements.
	Type of animal	Type of animal (Dog, Cat, Exotic Pet, Livestock, Poultry, or Other).	Consider splitting exotic pets into more specific types: bird, reptile, small mammals, etc.
	Breed	Breed of animal.	OK
	Size	Size class (small, medium, large, extra-large) of animal affected.	Recommend defining weight range.
	Weight	Weight of the animal affected.	Optional. If not known, then can give size/weight class.
	Sex	Sex of the animal affected.	Add
	Age	Age of the animal affected.	Add
	Acute or Chronic	Identify if the exposure to the pesticide was acute or chronic.	Add
Adverse Effects	Time to Symptoms	The amount of time after the exposure to onset of signs and symptoms were noted.	OK
	Case Symptoms	Written description of signs and symptoms affecting a particular individual. Include description of severity, if possible.	Use general categories and specific field for symptoms as was used for human incidents. Use Medra coding
	Medical care provided (Yes/No)	Indicates if any medical care was provided. (Yes/no)	
	Treatment/care provided	Description of treatment and care given to the animal for treatment or management of the symptoms. (Free text)	Add. If Medical Care Provided is “yes”
	Pre-Existing Condition	Describes any pre-existing medical condition that might be relevant to the case.	Add

Subgroup	Data Element	Description	Comments
	Other medications and chemicals	Description of other medications or chemicals to which the animal was exposed.	Add
	Management site	Site where the animal was cared for after exhibiting symptoms.	Add
	Case Outcome	Characterization of the current status or final outcome of adverse effects.	OK
	Domestic Animal Product	Indicates if the product is sold for direct application to domestic animals, such as spot on or shampoo. (yes/no)	OK
	Type of application onto animal	For incidents associated with domestic animal products, provides a description of the type of application (spot, whole body, etc.)	Add. Ask only when <i>Domestic Animal Product</i> is "yes"
	Contact with other treated animals	Indicates if the affected animal had contact with other treated animals.	OK
Fields Filled by EPA			
EPA Fields	PC Code	PC Code(s) of the active ingredient(s) to which the affected person or other organism was exposed.	
	Certainty	EPA's conclusion on the certainty that the ingredient caused or contributed significantly to causing the observed adverse effects. Entered for each ingredient.	
	Certainty Discussion	A brief discussion of the evidence supporting the certainty level that EPA assigned to the ingredient.	
	Legality	EPA's categorization on the legality of the pesticide use. Legality categories are "Registered Use," "Suspected Misuse," "Known Misuse," and "Malicious Intent." ["Malicious Intent" used for intentional targeting of affected person or non-target organism.]	
	Exposure-Severity Code	Code that indicates the type of incident and the severity level of the incident.	