**Use Site Index Pilot Model and Vocabulary Check**

**April 2018**

As a part of this phase of the SmartLabel Pilot we would like you to assess the Use Index model, SmartLabel Vocabulary, CDX Builder, and Guidance Documents. In order to ensure a comprehensive evaluation of our model and documents over a variety of label types, we ask that you choose at least five labels and see if you can adequately summarize the use information they contain. We are interested both in typical labels and more complicated labels. To conduct your assessment, please use the *Structured Product Labeling (SPL) Implementation Guide with Validation Procedures Version 0.07*, *EPA CDX SmartLabel Builder User Guide (abridged) (Version 2), EPA CDX SmartLabel Builder User Guide (unabridged) (Version 2)*, and *SmartLabel Vocabulary Guide (Version 2) (VG)*, to guide your extraction of labels into *The EPA CDX SmartLabel Builder*. A great deal of information is contained in these documents and the builder. In order to guide your review and structure your comments, we suggest using the following guide.

For all of the questions below, please review the indicated information (guidance/model/builder/vocabulary). If you find the reviewed information is satisfactory, put an “X” under “Adequate”. If something is missing, confusing, or overly burdensome please write an explanation in the “Inadequate” column. Please be *very* specific in your explanation, so that we can fully address the issues you identify.

* If vocabulary definition is inadequate or confusing, please provide an explanation of how we could improve the definition.
* If a piece of vocabulary is missing, provide an example of how we could better capture the information. Indicate how that information might be useful for risk assessment, or other downstream uses of the Use Index Database.
* If guidance for a section is inadequate or confusing, please provide and explanation of how we could make the directions clearer.

Thank you for your continued participation in this pilot. Your comments have been (and will continue to be) invaluable in the development of the SmartLabel.

**Guidance Documents:**

1. Does the *Structured Product Labeling (SPL) Implementation Guide with Validation Procedures Version 0.07 (IG)* provide enough information to understand the SmartLabel Model?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does the *EPA SmartLabel Builder User Guide (Version 2) (abridged and unabridged versions)* provide enough information to operate the CDX Builder (when used in conjunction with the IG)?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does the *SmartLabel Vocabulary Guide (Version 2)* provide enough information to understand the SmartLabel vocabulary structure and definitions? (Please provide an evaluation of the structure of the document. Evaluation of the content of the individual lists should be entered below in the vocabulary section.)

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

**SmartLabel Use Index Model:**

1. Does the level of information requested in the model seem reasonable?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does the model have a field to capture everything you consider useful for quantitative risk assessment?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Are the validation rules present in the IG/builder adequate to ensure that the user enters the information intended by the Agency? Do you understand the reason for all of the validation rules? Are any validation rules missing (are you able to successfully validate illogical information)? Are any validation rules excessive/illogical?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

**Data Elements, Vocabulary Picklists, and Definitions:**

1. Do our data elements and picklists provide the information you need? Please review each data element from the model and indicate if the entry field and/or associated picklist is adequate, or if something is missing or extraneous. Please be specific in your notes if the entry option isn’t adequate.

|  |
| --- |
| **Product Level** |
| **Data Element** | **Type** | **Adequate** | **Inadequate (please explain)** |
| Active Ingredient(s) | picklist selection |  |  |
| Product Density (Required for Liquids) | value unit / value unit /  |  |  |
| Mass Active Ingredient per Miscellaneous Application Unit | value unit / value unit /  |  |  |
|  |
| **Site Level** |
| **Data Element** | **Type** | **Adequate** | **Inadequate (please explain)** |
| Use Site/Commodity | picklist selection |  |  |
| Use Site Location(s) | picklist selection |  |  |
| Maximum Number of Applications per Site per Time | value / picklist selection |  |  |
| Maximum Site Application Rate per Time |  value unit / picklist selection |  |  |
|  |
| **Scenario Level** |
| **Data Element** | **Type** | **Adequate** | **Inadequate (please explain)** |
| Single Application Minimum Rate | value unit |  |  |
| Single Application Maximum Rate | value unit |  |  |
| Acre rate for non-standard target measures | value unit / value unit /  |  |  |
| Minimum Diluent Volume per Area | value unit / value unit /  |  |  |
| Residence/contact time | value unit |  |  |
| Maximum Number of Applications per Scenario per Time | value / picklist selection |  |  |
| Minimum Application Rate per Scenario per Time | value unit / value unit / picklist selection |  |  |
| Maximum Application Rate per Scenario per Time | value unit / value unit / picklist selection |  |  |
| Maximum Number of Crop Cycles per Year | value / picklist selection |  |  |
| Form As Applied | picklist selection |  |  |
| Application Target(s) | picklist selection |  |  |
| Application Type(s) | picklist selection |  |  |
| Application Equipment | picklist selection |  |  |
| Application Timing (Site Status) | picklist selection |  |  |
| Application Timing (Day) | picklist selection |  |  |
| Application Timing (Pest) | picklist selection |  |  |
|  |
| **Restrictions** |
| **Data Element** | **Type** | **Adequate** | **Inadequate (please explain)** |
| Geographic Area(s) (Allowed) | picklist selection |  |  |
| Use Site Food Relationship | picklist selection |  |  |
| Maximum AI Rate Across Products per Time | value unit / value unit / picklist selection |  |  |
| Rotational Crop | presence/ absence selection |  |  |
| *Applicator Class Restriction(s)* | picklist selection |  |  |
| *Personal Protection Equipment(PPE)/ Engineering Control(s)* | picklist selection |  |  |
| Re-Entry Interval | value unit  |  |  |
| Minimum Retreatment Interval | value unit |  |  |
| *Pre-Harvest Interval(s)* | value unit, picklist selection |  |  |
| *Pre-Grazing Interval (PGI)/ Pre-Feeding Interval(s)* | value unit, picklist selection |  |  |
| Pre-Slaughter Interval(s) | value unit, picklist selection |  |  |
| Buffered Area(s) | value unit, picklist selection |  |  |
| Max Release Height | value unit  |  |  |
| Max Wind Speed | value unit |  |  |
| Temperature Range at Application | value unit - value unit |  |  |
| ASABE Droplet Size(s) | picklist selection |  |  |
| Soil Incorporation Depth and Time | value unit, value unit  |  |  |
| Restricted Soil Type(s) | picklist selection |  |  |
| Minimum Percent Soil Organic Matter | value |  |  |
| Minimum Age of Animal To Be Treated | value unit |  |  |
| Minimum Weight of Animal To Be Treated | value unit |  |  |
| Pollinator Protection Statement(s) | picklist selection |  |  |
| Bulletins Live Statement | presence/ absence selection |  |  |
| Water Protection Statement(s) | picklist selection |  |  |
| Secondary Manufacturing | presence/ absence selection |  |  |
| Restricted Use Site Location(s) | picklist selection |  |  |
| Restricted Application Target(s) | picklist selection |  |  |
| Restricted Application Type(s) | picklist selection |  |  |
| Restricted Application Equipment | picklist selection |  |  |
| Restricted Application Timing (Use Site Status) | picklist selection |  |  |
| Restricted Application Timing (Timing of Pest) | picklist selection |  |  |
| Restricted Application Timing (Time of Day) | picklist selection |  |  |
|  |
| **Multiple Levels** |
| **Data Element** | **Type** | **Adequate** | **Inadequate (please explain)** |
| Units | picklist selection |  |  |

**CDX Builder:**

1. Does the builder allow you to successfully enter the information requested in the guidance document?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does the data entry operate as intended (including cloning, and adding/removing data)?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does validation operate as intended?

|  |  |
| --- | --- |
| **Adequate** | **Inadequate (please explain)** |
|   |  |

1. Does rendering operate as intended?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does the save function/uploading saved files operate as intended?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |

1. Does submission operate as intended?

| **Adequate** | **Inadequate (please explain)** |
| --- | --- |
|   |  |