



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010  
Minneapolis, MN

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**RESOLUTION NUMBER:** 1 and 37 Combined      **APPROVED**

**SOURCE:** COMMITTEE ON CAPTIVE WILDLIFE AND ALTERNATIVE LIVESTOCK  
COMMITTEE ON TUBERCULOSIS

**SUBJECT MATTER:** FUNDING FOR EVALUATION OF THE CHEMBIO ANTIBODY TEST AS  
AN OFFICIAL TUBERCULOSIS PROGRAM TEST FOR CERVIDS

#### **BACKGROUND INFORMATION:**

Infection with *Mycobacterium bovis* (*M. bovis*) continues to plague the United States cattle and cervid industries with a significant number of tuberculosis (TB) infected herds detected annually. During 2009-2010, TB strains were detected in cattle and captive cervid herds that were similar to strains from TB outbreaks in captive cervid herds found during the 1990's. Until 2009, these strains had not been detected in cattle for at least ten years.

The single cervical tuberculin (SCT) test is the primary screening test used in the cervid TB program. A major disadvantage of this test is that it requires animals to be handled twice, once for the tuberculin injection and a second time to read the test. Further, the person injecting and reading the test must also be adequately trained and sufficiently experienced to read the test accurately. Experience is critical; determining a response may be subjective, especially if the response to the injection is small.

Advances in the science of tuberculosis testing have led to the development of antibody tests. The availability of antibody tests for farmed cervids would decrease the need for handling of these species, and would allow for increased interest in tuberculosis testing by producers. Blood based antibody tests for use in cervid species would lead to increased participation of farmed herds in the tuberculosis eradication program.

The CervidTB Stat-Pak has recently become licensed by the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Center for Veterinary Biologics (CVB), and is pending evaluation as an official TB Program Test.

At the 2006 United States Animal Health Association Annual Meeting the following resolution was approved as Resolution 21: "The United States Animal Health Association (USAHA) recommends that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) validate a serological tuberculosis test for captive cervids..."

The Resolution had the following response: "The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Service (VS) maintains interest in enhancing and approving new, reliable tests for tuberculosis. We specifically look forward to testing methods that will exceed the accuracy of our current tests and reduce the impact of testing on producers and their livestock. For these reasons, USDA-APHIS-VS fully supports this recommendation. Implementation of this project will be heavily dependent on the industry for providing samples, providing assistance with the purchase of suspects and reactors for confirmatory testing, assistance during testing, and with the promotion of this effort with the industry. Implementation of this project is also dependent on the availability of time, personnel, and financial resources. USDA-APHIS-VS fully intends to pursue this project as long as the required resources and industry support are available."

At the 2007 USAHA Annual Meeting the following resolution was approved as Resolution 26: “The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) to expedite the validation process for tuberculosis (TB) serological tests for cervid’s to enhance surveillance for TB.”

At the 2009 USAHA Annual Meeting the following resolution was approved as Resolution 23: “The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Services (APHIS), Center for Veterinary Biologics (CVB) to work with the bovine tuberculosis program staff to prioritize the review of new *Mycobacterium bovis* antibody test submitted to CVB for approval.”

The Resolution had the following response: “The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) is fully supportive of the resolution to expedite the review of new bovine tuberculosis (TB) antibody tests. Toward this end, a working group has revised the VS TB Program Memorandum 552.40, “Evaluation of Tests Proposed for Official Use in the Bovine Tuberculosis Eradication Program,” which is being distributed for review and clearance. This memorandum provides guidelines for the evaluation of tests proposed for official use in the Bovine TB Eradication Program. It has been revised to describe the protocol for VS’ field studies and to clarify the roles and responsibilities of various parties during the evaluation of tests. The working group members included individuals representing the TB Scientific Advisory Subcommittee of the United States Animal Health Association, the Center for Veterinary Biologics (CVB), the National Veterinary Services Laboratories, and the TB Program. Additionally, the CVB has designated one senior staff veterinarian to facilitate and expedite the review of all *Mycobacterium bovis* antibody test kit applications.”

The USAHA has recognized in recent years through discussion and these resolutions that many companies are generating promising data on antibody based TB diagnostic tests. Antibody based tests have the potential to be more widely accepted by producers, due to reduced handling and subsequent injury and death. Increased acceptance would in turn result in improved surveillance and herd management for bovine TB in captive cervids. Blood based antibody tests represent viable alternatives to current TB test methods and many such tests have demonstrated promising results.

#### **RESOLUTION:**

The United States Animal Health Association urges the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services to prioritize funding to allow evaluation of the Chembio CervidTB Stat-Pak® test as an official tuberculosis test for the Cervid Tuberculosis Eradication Program.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) supports the request of the United States Animal Health Association’s Committee on Tuberculosis to prioritize funding to evaluate the Chembio CervidTB Stat-Pak® as an official tuberculosis (TB) test for the Cervid Tuberculosis Eradication Program.

VS is funding a project to evaluate the Stat-Pak as a primary test for official bovine TB program use in captive and free-ranging *Cervus canadensis* (North American elk), *Odocoileus virginianus* (white-tailed deer), and reindeer (*Rangifer tarandus*). Approximately 2,300 animals will be tested using the Stat-Pak, which will be compared to the single cervical tuberculin test. The project began in December 2010 and will continue through September 2011.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS supported the request of the United States Animal Health Association's (USAHA) Committee on Tuberculosis to prioritize funding to evaluate the Chembio CervidTB Stat-Pak® as an official tuberculosis (TB) test for the Cervid Tuberculosis Eradication Program. The Stat-Pak® is a rapid antibody detection assay that employs a unique cocktail of selected recombinant antigens of *M. bovis* and *M. tuberculosis*.

VS funded a project to evaluate the CervidTB Stat-Pak® as a primary test for official bovine TB program use in captive and free ranging *Cervus canadensis* (North American elk), *Odocoileus virginianus* (white tailed deer) and reindeer (*Rangifer tarandus*). From December 2010 through August 1, 2011, about 1,600 animals were tested using the Stat-Pak® and compared to the single cervical tuberculin (SCT) test. The project goal was to test 2,300 animals. Non-negative animals on the Stat-Pak® were tested by the comparative cervical tuberculin (CCT) test then euthanized for diagnostic necropsy. The project results will be presented to the TB Scientific Advisory Committee at the 2011 USAHA annual conference and a project summary will be circulated to the State and Federal animal health officials after the conference. USDA plans to continue the project during fiscal year 2012 (contingent on receiving funding) to achieve the desired sample size for test evaluation.



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**RESOLUTION NUMBER: 2 APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON ANIMAL EMERGENCY MANAGEMENT

**SUBJECT MATTER:** NATIONAL VETERINARY STOCKPILE CATALOG

#### **BACKGROUND INFORMATION:**

State and tribal animal health officials and National Veterinary Stockpile (NVS) planners need to have access to a catalog of supplies and resources available through the NVS program for response to an animal health emergency. Resource planning and inventory tracking software should be accessible by planners to estimate and track costs and manage inventory received from the NVS program.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) National Veterinary Stockpile (NVS) program create, publish and maintain an NVS catalog on their restricted website that is accessible to NVS planners and state and tribal animal health officials. The catalog should provide information about all available NVS resources including countermeasures and 3-D contractors. The catalog should be user-friendly and include full descriptive information, such as photos, item number, text description, ordering procedure, and cost (for planning and tracking purposes). The catalog should state whether the item is accountable and required to be returned to the NVS, or requires special cleaning and disinfection (C&D), or special shipping or handling, and all other information NVS partners need to know about each item. The catalog should provide information about available NVS commercial services with instructions on how to submit a request with scope of work defined.

Inventory management software compatible with hand-held devices and capable of capturing barcodes and radio-frequency identification should be accessible on the NVS ordering/planning website and included with any NVS order so stockpile pallets and supplies may be managed from arrival to final disposition, including storage location and conditions, field deployment logistics, dispensing information, as well as C&D and return transportation information for accountable items and equipment. In addition, warehoused resources should be bar-coded prior to shipment to states and tribes so that logistics personnel can more efficiently manage NVS equipment and supplies on arrival and while deployed.

#### **INTERIM RESPONSE**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services, National Veterinary Stockpile (NVS) program appreciates the interest of the United States Animal Health Association (USAHA) in the development of a readily available resource that describes NVS countermeasures. An NVS catalog is already under construction and is scheduled for release to NVS planners and Federal, State, Tribal, and territory animal health officials by the end of 2011. The catalog will contain information about the contents of the NVS 24-hour push packs for initial response, bulk items available for sustained support, depopulation equipment,

large-animal handling equipment, commercial services, and other available countermeasures. The NVS program intends the catalog to be user-friendly and will take under advisement USAHA's specific recommendations regarding its format and content. Once complete, the catalog will be available through the NVS restricted Web site that is available to NVS planners. In the interim, State planners may contact Dr. Lee Myers, NVS State-Federal Liaison, for more information at [Lee.M.Myers@aphis.usda.gov](mailto:Lee.M.Myers@aphis.usda.gov). The NVS program will continue to advance its capabilities to support logistics response to damaging animal disease outbreaks.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), National Veterinary Stockpile (NVS) program appreciates the interest of the United States Animal Health Association (USAHA) in the development of a readily available resource that describes NVS countermeasures.

An NVS catalog is now available to NVS planners through the NVS restricted Web site at <http://nvs.aphis.usda.gov>. The catalog contains information on the contents of the NVS 24-hour push packs for initial response, initial bulk items available for sustained support, depopulation equipment, large-animal handling equipment, and other available countermeasures. The NVS program designed the catalog to be user-friendly and took USAHA's specific recommendations under advisement about the format and content. The Question and Answer section of the NVS Web site and the NVS Planning Guide has specific information on NVS's depopulation, decontamination, and disposal (3D) commercial support services, the process to request assistance, and an example statement of work.

The NVS program recognizes the need for inventory management systems and electronic identification (e.g., bar coding) of countermeasures to help States, Tribes, and Territories better manage physical resources. Although the NVS program concurs with these suggestions, the level of funding for NVS (currently and in the near future) will not support the costs to procure and manage these systems. As a result, States, Tribes, and Territories are encouraged to develop their own independent systems for agricultural emergencies or collaborate with other agencies within their jurisdictions for assistance with inventory management during emergency responses (e.g., emergency management agencies, the National Guard, and the Strategic National Stockpile).

The NVS program appreciates the opportunity to respond and will continue to advance its capabilities to support logistics response to damaging animal disease outbreaks.



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**RESOLUTION NUMBER:** 3 APPROVED

**SOURCE:** USAHA/AAVLD COMMITTEE ON ANIMAL EMERGENCY  
MANAGEMENT

**SUBJECT MATTER:** RESTRICTED ANIMAL VACCINE USAGE GUIDANCE

#### **BACKGROUND INFORMATION:**

State and tribal animal health officials, animal production industries and associated processing industries need clearer guidance relative to the use of restricted animal vaccines in the face of an outbreak of certain foreign animal diseases (FAD) in the United States, especially foot-and-mouth disease (FMD), classical swine fever (CSF), and Rift Valley fever (RVF). Policy on usage of these vaccines will inform disease spread modeling, response cost estimates, continuity of business planning, and market recovery. Depending on the specific disease emergency, certain segments of animal industries (and possibly public health) will be impacted differently, so FAD planning and response at all levels, i.e., animal production unit, regional food chain, and international trade, must be based on official vaccine usage policy and guidance.

#### **RESOLUTION:**

The United States Animal Health Association requests that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) National Center for Animal Health Emergency Management develop policy and technical guidance for utilization of restricted animal vaccines in the United States for economically important foreign animal diseases (FAD) such as foot-and-mouth disease (FMD), classical swine fever (CSF), and Rift Valley fever (RVF). Federal, state and tribal animal health and regulatory officials and academic, and industry stakeholders should be included as members of FAD/FMD policy groups and steering committees to address transportation, storage, tracking and administration of restricted vaccines, as well as identification, marketing, transportation and disposal of vaccinated animals. The policy and technical guidance should be approved by USDA-APHIS-VS leadership and incorporated into national FMD, CSF, and RVF preparedness plans and countermeasure strategies and be made available to all aforementioned stakeholder groups.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Veterinary Services' National Center for Animal Health Emergency Management agrees with the United States Animal Health Association's (USAHA) interest in the development of policy and technical guidance for using restricted animal vaccines in the United States for economically important foreign animal diseases (FAD) such as foot-and-mouth disease (FMD), classical swine fever (CSF), and Rift Valley fever (RVF). APHIS is currently conducting stakeholder meetings regarding FAD preparedness and response. The next scheduled meeting is May 2, 2011. The meetings' purpose is to gather stakeholder input on many FAD topics, but an early focus will be on vaccinating for FMD. Defining the parameters for FMD vaccination will build a foundation for developing vaccination strategies for other FADs.

APHIS also supports USAHA's interest in ensuring that policy and technical guidance incorporated into national FMD, CSF, and RVF preparedness plans and countermeasure strategies are made available to stakeholders. APHIS has already developed new FAD Preparedness and Response Plans (FAD PReP), including standard operating procedures, guidelines, and plans that are publically available on the Web at <https://fadprep.lmi.org>.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

On May 2, 2011, a second Animal and Plant Health Inspection Service (APHIS) Stakeholder meeting was held to discuss the challenges, impacts, and consequences of using vaccination in the event of a foot-and-mouth disease (FMD) outbreak. APHIS provided introductory presentations about FMD and the strategies for vaccine use. Breakout sessions were held to provide opportunities for stakeholders to ask questions, express concerns, and share ideas on how to move forward in implementing a vaccine policy that addresses their concerns. In response to United States Animal Health Association resolution number 3 and feedback from the May 2 meeting, APHIS is exploring options to form groups with wide stakeholder representation to help inform decisionmaking and policy development on emergency vaccination (e.g., a National Association of State Animal Health Officials subcommittee focused on movement control, continuity of business, and permits). Additionally, and as part of a larger FMD Response Toolbox, we are developing a decision support tool to help determine the appropriate control strategies to use in a specific outbreak. The decision tool considers important criteria on available resources, outbreak demographics, and acceptance of control measures. APHIS will initially explore implementation and usability with emergency management decisionmakers and plans to share and test the decision tool with our stakeholders.

An additional stakeholder meeting is planned for early November 2011 to discuss animal movement control strategies and continuity of business planning. APHIS will continue to work with our stakeholders to develop national-level guidance on FMD mitigation strategies.



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**RESOLUTION NUMBER: 4 APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON ANIMAL EMERGENCY  
MANAGEMENT

**SUBJECT MATTER:** ANIMAL AGRICULTURE CRITICAL INFRASTRUCTURE PROTECTION

#### **BACKGROUND INFORMATION:**

Agriculture is essential to our nation's health and prosperity and has been designated as a critical infrastructure of this country. Animal agriculture is a major contributor to the economy of most states and is a key source of export income. The livestock and poultry business in the United States is a \$121 billion industry with agriculture accounting for approximately 13% of the nation's gross domestic product. Animal agriculture provides nutrient-dense protein products and many other vital commodities not only for Americans, but for nations throughout the world.

Living in a non-agrarian society makes it difficult for some states' emergency management and homeland security decision-makers to understand and acknowledge the importance of animal agriculture. As a result, state strategic plans, operational mandates and funding criteria may be established at the exclusion of agricultural interests. This has resulted in some states receiving little or no animal agriculture-related homeland security funding which has created a gap in their ability to prevent, protect against, respond to, or recover from animal emergencies that impact the state and the nation.

#### **RESOLUTION:**

The United States Animal Health Association requests that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) and the Department of Homeland Security (DHS), Federal Emergency Management Agency and Infrastructure Protection develop efficient, dedicated funding streams in support of animal agricultural asset protection, whether such funds reside within the DHS Homeland Security Preparedness Grant Program as a sub-program specific for agriculture or within USDA-APHIS-VS for distribution to states via cooperative agreements. Funds should be distributed proportionately to states based on a formula which considers agricultural animal populations, international borders, value of animal agriculture to the state, and number of premises holding agricultural animals to assure that appropriate levels of funding are available for animal emergency management programs.

In order to strengthen homeland security preparedness and to enhance the ability of state, local, and tribal governments to prevent, protect against, respond to and recover from agro-terrorist attacks and animal agriculture-related disasters, an assistance program specific for animal agriculture protection should be established and state and tribal agricultural officials granted latitude to decide the best use of such funds.

#### **RESPONSE:**

##### **FEMA**

The Federal Emergency Management Agency (FEMA) has worked closely with the U.S.



Department of Agriculture (USDA) Animal Plant and Health Inspection Services (APHIS) Veterinary Services (VS) for many years in the implementation of Homeland Security Presidential Directive 9, Defense of United States Agriculture and Food. As part of this collaboration FEMA typed animal health resources ([https://www.fema.gov/pdf/emergency/nims/5081\\_animal\\_health\\_resources.pdf](https://www.fema.gov/pdf/emergency/nims/5081_animal_health_resources.pdf)), defined Incident Management Systems Job Titles for Animal Emergency Response (<http://www.fema.gov/library/viewRecord.do?id=3024>), and most recently developed position task books for Animal Emergency Response Team to become fully qualified part of State and local incident response. FEMA is also currently collaborating with APHIS to revise Section 16 of the Authorized Equipment List so it reflects current understanding of equipment needs to address animal issues in disasters from all hazards. FEMA's National Exercise Division has developed and delivered numerous training programs, exercises and courses specifically related to animal agriculture and pets.

FEMA also works closely with DHS National Protection and Programs Directorate; Office of Infrastructure Protection (IP) every year to complete the IP Data Call. The IP Data Call provides opportunities for States and territories to collaborate with DHS and its Federal partners in Critical Infrastructure and Key Resources (CIKR) protection. DHS, State and territorial Homeland Security Advisors, Sector Specific Agencies, and territories build their CIKR data using the IP Data Call application. The data collected is used to identify CIKR which should received priority for grant funding, such as the Buffer Zone Protection Program. IP also publishes the "Agriculture and Food, CIKR Sector-Specific Plan Report" as input to the National Infrastructure Protection Plan. The 2010 report can be found at <http://www.dhs.gov/xlibrary/assets/nipp-ssp-food-ag-2010.pdf>. This report highlights many of the cooperative activities between DHS and USDA as well as other agencies.

Since 2006 FEMA has supported 42 States' applications for funding on projects related to food and agriculture protection. The total funding for these applications has been over \$760 million, of which nearly \$162 million was for projects with a primary mission to protect food and agriculture.

Most of the grant funding to protect critical infrastructure including Agriculture and food, has come from the State Homeland Security Grant Program and to a lesser extent from the Urban Area Security Initiative (UASI).

FEMA is bound by the Implementing Recommendations of the 9/11 Commission Act of 2007 (9/11 Act, P.L. 110-53). According to the 9/11 Act, grant funds are distributed to each State, which act as the fiduciary agent for grant funding. Grants under this program are made available to local and tribal governments, consistent with the applicable State homeland security strategy; in other words the priority for grant funding is set by the State Administrative Agency. The UASI program funding only supports certain designated high-risk urban areas. Unfortunately, FEMA is unable to establish dedicated funding streams for animal agriculture asset protection through these grant programs.

#### **INTERIM:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Veterinary Services recognizes the concerns of the United States Animal Health Association and appreciates the opportunity to respond.

APHIS is committed to strengthening and increasing collaboration and coordination with stakeholders to enhance the nation's preparedness for responding to an animal health emergency. Historically, APHIS has invested in State, Tribal, and territorial animal health emergency management through a variety of programs and mechanisms. APHIS continues to provide critical emergency management resources and support through Area and Regional Office Area Emergency Coordinators, who work hand in hand with State animal health and emergency management officials on a daily basis.

At the Federal level, APHIS collaborates closely with the Department of Homeland Security's Federal Emergency Management Agency (FEMA) in developing tools to help States, Tribes, and territories identify response capabilities and develop plans to address gaps. APHIS also collaborates closely with

the Environmental Protection Agency and other Federal agencies on a host of projects that support State, Tribal, and territory animal health emergency management.

APHIS supports this resolution. With our partners at FEMA, APHIS is working to explore options and strategies to develop effective funding streams to support the protection of animal agriculture assets.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond. APHIS worked with our partners at the Department of Homeland Security (DHS) Office of Health Affairs (OHA) and the Federal Emergency Management Agency (FEMA) to explore options for developing a dedicated funding stream to support the protection of animal agricultural assets. The FEMA Homeland Security grant process does not allow directed funding for the protection of animal agriculture assets because FEMA is bound by the Implementing Recommendations of the 9/11 Commission Act of 2007 (911 Act). The 911 Act authorizes FEMA to distribute grant funds to State governments who in turn make these funds available to local and Tribal governments in accordance with each State's homeland security plan (i.e., the priority for grant funding is determined by the State).

The FEMA Homeland Security grant process does not specifically allocate funds for the protection of animal agricultural assets. Instead, funding is provided to the States for critical infrastructure protection activities, including the food and agriculture sector. Annually, FEMA works with the DHS National Protection and Programs Directorate, Office of Infrastructure Protection (IP) to complete the IP data call. The IP data call provides opportunities for States and Territories to collaborate with DHS and its Federal partners in critical infrastructure and key resources (CIKR) protection. DHS, State and Territory Homeland Security Advisors, and sector specific agencies build their CIKR data using the IP data call application. The data collected is used to identify CIKR that should receive priority for grant funding, such as the Buffer Zone Protection Program.

OHA developed the online grants tutorial ([https://foodshield.org/grants\\_tutorial/index.html](https://foodshield.org/grants_tutorial/index.html)) to assist State, local, and Territory stakeholders with all-hazards disaster preparedness and response. The tutorial is divided into three sections:

- Section 1: "Find" provides the basics for individuals who are beginning to explore Federal funding opportunities. This section helps those who are new to the grant writing process and want to learn more about the types of funding available and how to locate grants that match their needs.
- Section 2: "Apply" provides guidance to help evaluate the applicability of specific grants, describes the scope of information required in the application process, and provides information on how to write a successful investment justification. Additionally, this section helps people who want to learn more about evaluating which grant programs would work best for them (or their organization) and about the scope of information required in the application process.
- Section 3: "Manage" introduces post-award considerations, including the requirements for managing a grant.

APHIS also worked with FEMA to develop an animal health specific list of "Typed Resource Definitions" that are eligible for support through FEMA grants. The list is available online at [http://www.fema.gov/pdf/emergency/nims/508-1\\_animal\\_health\\_resources.pdf](http://www.fema.gov/pdf/emergency/nims/508-1_animal_health_resources.pdf).

While dedicated funding to support the protection of animal agricultural assets is not an option at this time, use of the resources described above and participating in the IP data call should increase the likelihood for obtaining funding through Federal grant programs.



**INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

The USAHA/American Association of Veterinary Laboratory Diagnosticians' National Animal Health Laboratory Network (NAHLN) Information Technology (IT) subcommittee identified several NAHLN laboratory IT specialists who could participate in developing components of the NAHLN IT system, pending access feasibility. The VS Chief Information Officer (CIO) verbally agreed to this during the subcommittee meetings. However, further development of the NAHLN IT system is currently on hold pending completion of the Department-required Certification and Accreditation process. NAHLN IT resources are primarily concentrated on addressing security concerns and upgrades. The NAHLN program office will issue cooperative agreements with key NAHLN laboratory IT experts who can collaborate with VS and enhance progress on developing and implementing the NAHLN IT system.

Further, the VS CIO's highest priority in early 2011 was to secure commercial off-the-shelf (COTS) software that meets over 900 specified requirements, including those of the NAHLN IT system. Because this COTS product will eventually replace the NAHLN IT system, laboratory messaging functionality is a high-priority required element. The COTS software has been secured.

**FINAL RESPONSE**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

The USAHA/American Association of Veterinary Laboratory Diagnosticians' National Animal Health Laboratory Network (NAHLN) Information Technology (IT) subcommittee identified several NAHLN laboratory IT specialists who could participate in developing components of the NAHLN IT system, pending access feasibility. The VS Chief Information Officer (CIO) verbally agreed to this during the subcommittee meetings. NAHLN IT resources have been primarily concentrated on addressing security concerns and upgrades due to the USDA-required certification and accreditation process.

The NAHLN program office will issue cooperative agreements with key NAHLN laboratory IT experts who can collaborate with VS and enhance progress on developing and implementing the NAHLN IT system. The training necessary to implement diagnostic test result messaging was developed by NAHLN laboratory experts and delivered to participants from seven laboratories not currently messaging in August 2011. A new NAHLN IT project team has been formed and is working with NAHLN program staff and NAHLN IT experts to assess status and establish priorities.

The VS CIO's highest priority in early 2011 was to secure commercial off-the-shelf (COTS) software that meets more than 900 specified requirements, including those of the NAHLN IT system. Because this COTS product will eventually replace the NAHLN IT system, laboratory messaging functionality is a high-priority required element. The COTS software has been secured.



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**RESOLUTION NUMBER: 6, 7, 9, 41, 43 and 46 Combined APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON ANIMAL HEALTH  
SURVEILLANCE AND INFORMATION SYSTEMS  
USAHA/AAVLD COMMITTEE ON AQUACULTURE  
COMMITTEE ON INFECTIOUS DISEASES OF CATTLE,  
BISON AND CAMELIDS  
COMMITTEE ON TRANSMISSIBLE DISEASES OF SWINE  
COMMITTEE ON TRANSMISSIBLE DISEASES OF POULTRY  
AND OTHER AVIAN SPECIES  
COMMITTEE ON SHEEP AND GOATS

**SUBJECT MATTER:** UNITED STATES NATIONAL LIST OF REPORTABLE ANIMAL  
DISEASES

#### **BACKGROUND INFORMATION:**

A National List of Reportable Animal Diseases (NLRAD) will be one uniform, science and policy based, nationally supported standard list of animal diseases. Standard uniform case finding and case reporting criteria will provide the basis for uniform reporting. The list will facilitate national, interstate, and international commerce; assist in meeting international reporting obligations to the World Organization for Animal Health (OIE) and trading partners; support generation of export certifications; and contribute to the assessment and reporting of the listed zoonotic and endemic animal diseases in the United States.

In 2006, the United States Animal Health Association (USAHA) and the American Association of Veterinary Laboratory Diagnosticians (AAVLD) formally identified the need for a unified national list of reportable animal diseases. USAHA previously recommended that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), Centers for Epidemiology and Animal Health (CEAH) compile and evaluate current state reporting and notification requirements. Although all states have a required reportable diseases list, there is large variability in these lists. Requirements for federal reporting are related only to program diseases or foreign animal diseases.

In 2007, USAHA and AAVLD formally requested that USDA-APHIS-VS, in cooperation with state animal health officials and industry, develop a United States NLRAD. The NLRAD should include appropriate reporting criteria. The USDA-APHIS-VS supported drafting a list of diseases that may be considered national reportable diseases.

In 2008, USAHA and AAVLD requested that USDA-APHIS-VS task the existing National Animal Health Reporting System (NAHRS) subcommittee of the USAHA/AAVLD Committee on Animal Health Surveillance and Information Systems, with support from the USDA-APHIS-VS-CEAH-National Surveillance Unit (NSU), with developing the NLRAD as well as the case definitions and reporting criteria for each disease on the list. The USDA-APHIS-VS supported this request.

From 2008-2010, the NAHRS Steering Committee in conjunction with the NSU has developed a NLRAD overview draft white paper and a proposed NLRAD. The NLRAD white paper describes the NLRAD reporting structure, the standard operating procedures for the approval and maintenance of the NLRAD, and case definitions and reporting criteria development.

**RESOLUTION:**

The United States Animal Health Association requests that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), after engagement of stakeholders and state animal health officials, finalize a United States National List of Reportable Animal Diseases (NLRAD) and related NLRAD white paper. In addition, once a NLRAD is finalized, USDA-APHIS-VS should initiate the regulatory process to establish and maintain the NLRAD and associated reporting requirements.

**INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) continues to move forward with developing and implementing a U.S. National List of Reportable Animal Diseases (NLRAD). VS does this in coordination with the National Animal Health Reporting System (NAHRS) subcommittee of the United States Animal Health Association/American Association of Veterinary Laboratory Diagnosticians Joint Committee on Animal Health Information Systems. VS agrees to engage stakeholders and State animal health officials before finalizing the NLRAD and related NLRAD white paper. In addition, once the NLRAD is finalized, VS will initiate the regulatory process to establish and maintain the NLRAD and necessary reporting requirements.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA, APHIS, VS and the National Animal Health Reporting System (NAHRS) subcommittee of the USAHA/American Association of Veterinary Laboratory Diagnosticians Joint Committee on Animal Health Surveillance and Information Systems continue to move forward with implementing a U.S. National List of Reportable Animal Diseases (NLRAD).

Currently, NLRAD is under review by National Association of State Animal Health Officials and VS Area Veterinarians in Charge with comments requested by September 23, 2011. The NLRAD has also been distributed to USAHA animal disease commodity committees with a request for discussion in Buffalo at the USAHA meeting and comments by October 30. After considering the current round of stakeholder comments with concurrence of the NAHRS subcommittee and final approval by VS management, it will be published as a cooperative State-Federal set of guidelines for reportable disease. In addition, once the NLRAD is finalized, VS will initiate the regulatory process to establish and maintain the NLRAD and associated reporting requirements.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

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**RESOLUTION NUMBER:** 8      **APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON AQUACULTURE

**SUBJECT MATTER:** USE OF THE LACEY ACT TO REGULATE ANIMAL PATHOGENS

#### **BACKGROUND INFORMATION:**

In September 2009, the Defenders of Wildlife petitioned the United States Department of the Interior and the United States Department of Agriculture (USDA), for the Fish and Wildlife Service (FWS) and Animal and Plant Health Inspection Service (APHIS) to promulgate regulations to prohibit the interstate and international trade and movement of live amphibians unless they are demonstrated to be free of the chytrid fungus, *Batrachochytrium dendrobatidis* (*Bd*), in accord with World Organization for Animal Health (OIE) standards. *Bd* is currently an OIE notifiable disease.

USDA-APHIS has not yet formally responded to the Defenders of Wildlife petition, but in September 2010, the FWS published (Federal Register, vol. 75, #180) a request for public comment on the need to regulate the importation and transportation of live amphibians or their eggs infected with chytrid fungus as injurious wildlife under the Lacey Act. The Lacey Act is intended to list animals as injurious to endangered species; this proposal is to list all amphibians infected with the *Bd* fungus as injurious. To be regulated under the Lacey Act, the FWS would have to conclude that *Bd* infected amphibians, their offspring or eggs "are injurious or potentially injurious to wildlife or wildlife resources, to human beings, or to the interests of forestry, horticulture, or agriculture of the United States."

Chytridiomycosis affects more than 120 species of wild and domesticated amphibians (some of which are considered threatened or endangered) and is endemic in the United States. The ownership and use of infected amphibians would be prohibited, except by permit for zoological, educational, medical, or scientific purposes; regulatory violations would be excessively punitive; diagnostic laboratory services would need to be expanded; the listing will impact other species that may serve as vectors or carriers of *Bd*; and, it would set an inappropriate precedent for regulating animal diseases as "injurious species."

#### **RESOLUTION:**

The United States Animal Health Association strongly recommends that the United States Fish and Wildlife Service (USFWS) not use the injurious species provisions of the Lacey Act to regulate animal pathogens. Further, the United States Department of Agriculture, Animal and Plant Health Inspection Service, USFWS and National Oceanic and Atmospheric Administration should clearly determine the appropriate federal agency for regulatory oversight of wildlife diseases and domestic animal diseases, without regulatory duplication.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

VS expects that future aquatic animal health regulations, including amphibian regulations, if any, will be developed within the context of the National Aquatic Animal Health Plan (NAAHP). Efforts are

underway within each of the co-competent authorities for aquatic animal health under NAAHP (APHIS, U.S. Fish and Wildlife Service, and the National Oceanic and Atmospheric Administration) to clarify their regulatory authority to reduce regulatory duplication and to better serve the aquatic animal health community that USAHA represents.





## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

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**RESOLUTION NUMBER: 10 APPROVED**

**SOURCE:** COMMITTEE ON DIAGNOSTIC LABORATORY AND  
VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** INCREASED FUNDING FOR RESEARCH AND EDUCATION ON  
CAUSES OF ZOO NOTIC DISEASES

#### **BACKGROUND INFORMATION:**

In February 2010, the Department of Homeland Security (DHS) announced the selection of Kansas State University and Texas A&M University as co-leads for a DHS Center of Excellence for Zoonotic and Animal Diseases. However, the original funding of \$30 million over 6 years was cut to \$21 million, with Kansas State receiving approximately \$2 million per year for six years and Texas A&M receiving approximately \$1.5 million per year for six years. The funding for Texas A&M was to support the continuing work of the National Center for Foreign Animal and Zoonotic Disease Defense (FAZD), while the funding for Kansas State University was to initiate a new Center of Excellence for Emerging and Zoonotic Animal Diseases (CEEZAD). Working together these Centers of Excellence are now in the process of establishing research and educational programs with some 30 institutions and collaborators, with Year 1 Work Plans already agreed by DHS.

Because of the extensive expansion of these programs, further funding is essential to sustain the four major research areas: (1) development of vaccines to counter animal diseases with potentially catastrophic public health and economic implications, such as Rift Valley fever, West Nile virus, ebola, foot-and-mouth disease and influenza in swine, horses and birds; (2) development of rapid diagnostic methods to detect these diseases; (3) epidemiology, modeling and simulation of the spread and impact of such diseases, as well as decision-support tools to help DHS and its partners manage potential outbreaks; and (4) educational programs to increase understanding of why more than 60 percent of all human diseases originate as animal diseases.

In May 2009, in testimony before the Senate Committee on Homeland Security, Dr. Tara O'Toole, subsequently appointed DHS Under Secretary for Science and Technology, stressed as one of her priorities to "increase the portion of the S&T budget devoted to basic science and innovative research to seek radical, innovative solutions to particularly difficult problems of high importance." Although the United States Department of Health and Human Services has recently announced that \$480 million will become available in 2011 to establish several Centers of Excellence for Advanced Development and Manufacturing, this significant funding will be of relevance primarily to human vaccine development after the identification of a potential pandemic, rather than the prevention of zoonotic diseases. Therefore, it is essential to significantly increase funding for veterinary research and education in order to investigate and, if possible, eradicate the causes of zoonotic diseases.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) urges Congress to appropriate \$2 million per year for FY2011 - FY2015, providing an additional \$1 million per year to the Center of Excellence for Emerging and Animal Diseases led by Kansas State University and \$1 million per year to the National Center for Foreign Animal and Zoonotic Disease Defense

led by Texas A&M University, thereby restoring cuts made in February 2010. USAHA requests the United States Department of Homeland Security, Science and Technology Directorate to strengthen this program for protecting the United States from emerging animal diseases.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

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**RESOLUTION NUMBER: 11 APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON DIAGNOSTIC LABORATORY AND VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** PREPARATION OF THE VETERINARY WORKFORCE TO BETTER PERFORM ACCREDITED TASKS, INCLUDING DETECTION OF AND RESPONSE TO ANIMAL DISEASE

#### **BACKGROUND INFORMATION:**

As stated in the United States Department of Agriculture (USDA) Final Rule announced in the Federal Register Volume 74, December 9, 2009: "We are amending the regulations regarding the National Veterinary Accreditation Program to establish two accreditation categories in place of the former single category, to add requirements for supplemental training and renewal of accreditation, and to offer program certifications. We are making these changes in order to support the Agency's animal health safeguarding initiatives, to involve accredited veterinarians in integrated surveillance activities, and to make the provisions governing our National Veterinary Accreditation Program more uniform and consistent. These changes will increase the level of training and skill of accredited veterinarians in the areas of disease prevention and preparedness for animal health emergencies in the United States." These changes include continuing education requirements for both of the new categories.

Maintaining an adequate number of trained accredited veterinarians is vital to this nation's animal health infrastructure. Accreditation is a national program and therefore requires uniformity. Accreditation training needs to be recognized as acceptable content for continuing education in the maintenance of state licenses.

#### **RESOLUTION:**

The United States Animal Health Association urges the United States Department of Agriculture, Animal Plant Health Inspection Service, Veterinary Services and the State Licensing Boards to work closely together to assure the content of accreditation material is uniformly presented across all states and that it be approved as continuing educational material toward meeting each state's veterinary license requirements.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) appreciates the United States Animal Health Association's resolution encouraging the standardization of information that the National Veterinary Accreditation Program (NVAP) presents to veterinarians who seek accreditation.

The fundamental components of the revised NVAP are consistency and standardized information on the role of, and expertise and awareness needed by, accredited veterinarians. Standardization begins with the core modules of the Initial Accreditation Training presented to

veterinary students at the 28 U.S. veterinary schools. The training is also mandatory for all veterinarians seeking accreditation after July 1, 2011. This consistent core knowledge is reinforced through common materials developed for presentation at core orientations and in the information modules developed for continuing education credits that are required for all accredited veterinarians every 3 years.

During the past year, VS was informed that some States have already authorized continuing education credits for the veterinary services supplemental training courses provided as part of the curriculum of several major veterinary conferences.

VS would be pleased if each State veterinary medical board approved the NVAP continuing education modules as creditable toward its continuing education requirements. However, we cannot ensure nationwide use because each State has its own requirements for continuing education courses.



the requirement for registration of certain manufacturers, distributors, or dispensers if he finds it consistent with the public health and safety.” By authority, the Attorney General oversees the DEA.

**RESOLUTION:**

The United States Animal Health Association requests that the Attorney General exercise the authority granted by the Controlled Substances Act of 1970, 21, United States Code Part 822 (d), to promulgate regulations which waive the requirement for veterinarians in ambulatory practices to have a separate United States Department of Justice, Drug Enforcement Administration registration in each state in which they are licensed or authorized to practice.

**RESPONSE:**

**U.S. Department of Justice**

DEA appreciates USAHA's interest in ensuring that veterinarians who deliver services in multiple states do so in compliance with federal law and regulation. A DEA registration is based, in part, on the specific controlled substance authority granted to each dispenser in that state. 21 U.S.C. § 823(f). DEA addressed this topic in more detail in the Final Rule titled, *Clarification of Registration for Individual Practitioners* that DEA published in the Federal Register on December 1, 2006.

As DEA stated in the June 2009 letter referenced in the USAHA resolution, the DEA is reviewing the overall issue of practitioners who practice in more than one state. This is a complex issue affecting many dispensers, including veterinarians. If it is appropriate for DEA to address this issue through the regulatory process, as authorized by 21 U.S.C. § 822(d), then any changes that DEA may propose regarding this issue will be published by DEA in the Federal Register and will be open to public comment. Under the Administrative Procedure Act (APA), federal agencies are required to make available to the public, through publication in the Federal Register, substantive rules of general applicability formulated or adopted by the agency. Adherence to this APA requirement ensures fairness to all members of the public by avoiding having the agency provide legal guidance to certain individuals to the exclusion of others. DEA is unable to provide you a timeframe on when this may occur.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

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**RESOLUTION NUMBER: 13 APPROVED**

**SOURCE:** COMMITTEE ON DIAGNOSTIC LABORATORY AND  
VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** VETERINARY SERVICES INVESTMENT ACT

#### **BACKGROUND INFORMATION:**

The Veterinary Services Investment Act (VSIA), Senate Bill 1709, was introduced in the House of Representatives on July 31, 2009 and was marked up and passed out of the Agriculture Committee on July 28, 2010. The VSIA would help ensure a stable and safe food supply for citizens in the United States.

The American Veterinary Medical Association (AVMA) reports that 60 percent of veterinary school graduates in 2009 entered private veterinary practice, however, only five percent opted to practice large-animal medicine. The Government Accountability Office has predicted a veterinarian shortage in the coming years. This shortage already exists in parts of rural America and shows signs of worsening unless current trends are reversed.

This legislation would establish a new competitive grant program to relieve veterinary shortage situations and support veterinary services. It will help address the challenges faced by America's farmers and rural communities which rely heavily on large animal veterinarians. Grants awarded under the program may be used for a variety of purposes including:

- Promoting recruitment, placement, and retention of veterinarians, veterinary technicians, students of veterinary medicine and students of veterinary technology.
- Assisting veterinarians with establishing or expanding practices for the purpose of equipping veterinary offices, sharing in the overhead costs of such practices, or to the establishment of mobile veterinary facilities where at least a portion of such facilities will address education or extension needs.
- Providing financial assistance for veterinary students, veterinary interns and externs, fellows and residents, and veterinary technician students to attend training programs in food safety or food animal medicine to cover expenses other than tuition.
- Establishing or expanding accredited veterinary education programs, veterinary residency and fellowship programs or veterinary internship programs or veterinary internship and externship programs in coordination with accredited colleges of veterinary medicine.
- Programs for tele-veterinary medicine where such practices shall at least in part contribute to veterinary extension, education, or research.
- Assisting the office or position of a state veterinarian or animal health official to coordinate veterinary services and food protection issues.
- Assessments of veterinarian shortage situations and preparation of applications for designation as a shortage situation.
- Continuing education and extension, including distance-based education, for veterinarians, veterinary technicians, and other health professionals needed to strengthen veterinary programs and enhance food safety.

- Recruiting and retaining faculty at accredited colleges of veterinary medicine.
- Programs, in coordination with universities or local educational agencies, to encourage students in secondary schools to pursue a career in veterinary medical or science professions.

VSIA will be administered by the National Institute for Food and Agriculture, an agency within the United States Department of Agriculture. The Secretary of Agriculture shall award a preference to applications that document coordination between or with the state, national allied or regional veterinary organizations, or specialty boards recognized by AVMA; the applicable accredited veterinary education institution, accredited department of veterinary science, or department of comparative medicine; or the applicable state veterinarian or animal health official (or its equivalent); and will use the grant funds to help meet veterinary workforce or food protection needs.

**RESOLUTION:**

The United States Animal Health Association requests that the United States Congress pass and fund the Veterinary Services Investment Act. This action would help to meet our nation's demand for large-animal veterinarians and rural America's need for services provided by veterinarians.





## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

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**RESOLUTION NUMBER: 14 APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON DIAGNOSTIC LABORATORY AND VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** SUPPORT FOR SECTION 1433 FORMULA FUNDS FOR ANIMAL HEALTH AND RESEARCH

#### **BACKGROUND INFORMATION:**

Section 1433 Formula Funds (P.L. 95-113) have been in existence since 1977 and provide an extremely valuable source of funds for fundamental research on diseases of food producing animals. These are important sources of funding for the Colleges of Veterinary Medicine and the Veterinary Science departments in the United States. In the past, these funds allowed food animal related research on local and emerging diseases; however these funds have been steadily dwindling and have been eroded by inflation. As a result, college faculties are shifting funding requests to the National Institutes of Health funded research, which will not support research on agricultural animals or on food safety at the farm level. Section 1433 Formula Funds have also supported training graduate students in most colleges and veterinary science departments. There are no other funds available at this time to provide this much needed support.

For a number of years the President's budget had not requested any money for Section 1433 Formula Funds, and Congress has provided less funding annually. In FY10, only \$2.95 million was appropriated to the fund.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the President include the authorized level of \$10 million for Section 1433 Formula Funds (P.L. 95-113) in his Annual Budget request.

USAHA also requests the House of Representatives and Senate Agriculture Appropriations Committees fund Section 1433 Formula Funds (P.L. 95-113) at the authorized level of \$10 million per year.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

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**RESOLUTION NUMBER:** 15 APPROVED

**SOURCE:** COMMITTEE ON DIAGNOSTIC LABORATORY AND  
VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** VETERINARY PUBLIC HEALTH WORKFORCE AND EDUCATION ACT

#### **BACKGROUND INFORMATION:**

There are critical shortages of veterinarians working in public health and rural practice disciplines such as emergency preparedness, environmental health, food safety and security, food production systems, regulatory veterinary medicine, diagnostic laboratory medicine and biomedical research. There are only 28 veterinary medical colleges in the United States, and there is not sufficient capacity to meet all of these needs.

All of these colleges are operating at maximum student capacity due to space limitations for teaching, diagnostics, and research. Laboratories, teaching hospitals, veterinary research facilities, and animal diagnostic areas are built specifically for use with animals ranging from laboratory animals, livestock species, and wildlife.

The Veterinary Public Health Workforce and Education Act amends the United States Public Health Service Act to increase the number of veterinarians trained in veterinary public health, which includes diagnostic laboratory medicine, veterinary pathology, regulatory medicine, emergency preparedness, and rural and government practice. The Veterinary Public Health Workforce and Education Act address these critical needs by providing:

- A competitive grant program for academic veterinary institutions for
  - New construction and/or new equipment
  - Expansion of post-Doctor of Veterinary Medicine specialty training opportunities
  - New faculty salaries
  - Curriculum development
  - Scholarships
- Programs to support faculty recruitment and retention, including veterinary laboratory diagnosticians
- A rotating fellowship program run by the United States Department of Health and Human Services (USDHHS)
- A Division of Veterinary Medicine and Public Health at the Health Resources and Services Administration

#### **RESOLUTION:**

The United States Animal Health Association supports the Veterinary Public Health Workforce and Education Act and urges the United States Congress to pass and fund this legislation.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

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**RESOLUTION NUMBER: 16 APPROVED**

**SOURCE: COMMITTEE ON DIAGNOSTIC LABORATORY AND  
VETERINARY WORKFORCE DEVELOPMENT**

**SUBJECT MATTER: VETERINARY MEDICINE LOAN REPAYMENT PROGRAM**

**BACKGROUND INFORMATION:**

The Veterinary Medicine Loan Repayment Program (VMLRP) was established by Congress in 2003 by the National Veterinary Medical Service Act (NVMSA) and is a student loan repayment program for veterinarians who practice in underserved areas. This loan repayment program is to be administered by the National Institute for Food and Agriculture (NIFA), an agency within the United States Department of Agriculture (USDA). The Secretary of Agriculture can determine veterinary shortage areas in rural practice, urban practice, federal and state government agencies, and discipline areas. Recently highlighted awareness of bioterrorism and foreign animal disease threats to public health and food safety has heightened the urgency for a fully-funded and implemented program. The VMLRP also creates a reserve corps of veterinarians available for mobilization in the event of an animal disease emergency or disaster.

USDA published interim final regulations to govern the program in the July 9, 2009 Federal Register. Veterinarians participating in the program will be required to practice in designated areas of veterinarian shortages which will be published in the Federal Register. Out of the 85,000 practicing veterinarians in the United States only 8,850 veterinarians practice food supply medicine and less than 4,000 are in public veterinary practice. Every state in the United States has shortages of food supply veterinarians. There is a similar shortage in public veterinary practice areas. The average starting salary of a 2009 graduate was \$65,185. Veterinarians entering food supply and public practice were compensated below that average. The average educational debt for veterinary school graduates in 2009 was \$129,976. Therefore, loan repayment is essential to address shortages of veterinarians in food animal medicine and public health practice.

USDA-NIFA published a final rule for the VMLRP in April, 2010. This regulation established the process and procedures for the solicitation, identification, and designation of veterinarian shortage situations (i.e., geographic and specialty) and the administrative provisions for soliciting applications from potential participants, the review process, the award process, and the terms and conditions of the agreements. NIFA solicited nominations for veterinarian shortage areas from State Animal Health officials and appropriate federal animal health officials in March, 2010. An expert review panel evaluated and recommended classification of each shortage area. Loan repayment awards were made on a competitive basis using a peer-review process evaluating the quality of the match between knowledge, skills, abilities and experience of the applicant relative to: 1) the specific needs of the veterinary shortage situation, 2) the criticality of the shortage situation, and 3) available funding. The application process closed in June of 2010 and offers were completed by the end of September, 2010.

The VMLRP will pay up to \$25,000 each year towards qualified educational loans of eligible veterinarians who agree to serve in a NIFA designated veterinarian shortage situation for a period of three years. However, this loan repayment is also subject to income tax which lowers the actual amount applied to the loan reimbursement program. During the fiscal year (FY) 2010 solicitation for veterinary shortage area nominations, NIFA received 249 nominations from across the country and the panel recommended 181 to be designated as shortage situations.

Congress awarded the VMLRP modest appropriations in fiscal years 2006 (\$495,000), 2007 (\$495,000), 2008 (\$868,875) and 2009 (\$2,950,000). The President recommended \$3 million for fiscal year 2010. Congress appropriated \$4.8M for the VMLRP in the fiscal year 2010 Agriculture Appropriations Bill.

At the current funding level only 64 veterinarians per year would be eligible to receive loan repayments. The average age of food supply veterinarians is over 55 years. This means that even more replacements will soon be needed. At the rate VMLRP is currently funded, the shortage of veterinarians will continue to increase. This will eventually impact animal and public health in the country because these food supply and public health veterinarians are essential in combating zoonotic diseases – there are more than 800 such diseases that can spread from animals to humans. Adequate funding for VMLRP should be \$20 million annually to effectively resolve the shortage.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the United States Congress fund the Veterinary Medicine Loan Repayment Program (VMLRP) (PL 108-161) at \$20 million per year for fiscal years 2011 through 2016 and then reevaluate the progress made. USAHA also urges Congress to exempt VMLRP awards from taxation.



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**RESOLUTION NUMBER: 17 APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON DIAGNOSTIC LABORATORY AND VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** REVIEW OF COMPENSATION FOR RESEARCH AND DIAGNOSTIC VETERINARIANS

#### **BACKGROUND INFORMATION:**

Veterinarians are employed in the United States Departments of Agriculture, Commerce, Defense, Homeland Security, Health and Human Services, Interior, and Veterans Affairs and in the Environmental Protection Agency, National Aeronautics and Space Administration, Smithsonian, and the United States Agency for International Development.

Veterinarians with advanced scientific training and expertise, including advanced degrees and board certification credentials, are critically needed for the prevention, control and eradication of animal diseases, as the first line responders for many human health issues and as a workforce for ensuring a safe global food supply. The research and diagnostic testing they conduct ensures animal diseases are rapidly identified and vaccines are developed. In order to attract and retain these scientists, additional compensation is required.

#### **RESOLUTION:**

The United States Animal Health Association urges the United States Departments of Agriculture, Commerce, Defense, Homeland Security, Health and Human Services, Interior, Veterans Affairs, and the Environmental Protection Agency, National Aeronautics and Space Administration, Smithsonian, and the United States Agency for International Development to adjust salaries to achieve parity with other health professional salaries in order to appropriately compensate, recruit and retain veterinarians with advanced degrees or board certification, in high priority research fields, diagnostic fields, and disease surveillance, prevention and control.

#### **RESPONSE:**

##### **Department of Health & Human Services**

The DHHS as a whole, including the NIH, regularly performs salary surveys and benchmarks with outside organizations and other federal agencies in order to remain competitive as we strive to recruit and retain veterinarians with advanced degrees and/or board certifications. Employing and retaining high quality scientists, clinicians, and veterinarians is a top priority as it allows us to further the mission of our agency.

**US Environmental Protection Agency**

EPA employs two full-time and one advisory board consultant veterinarian in research related capacities. We have reviewed their compensation status and have ensured that they are being compensated fully in accordance with applicable Federal pay schedules and position classification criteria. In addition, EPA has experienced no turnover issues in conjunction with this occupational area that would justify the payment of special salary rates or special incentives.

**NASA**

As with other Federal Agencies, compensation for veterinarians employed at NASA is based on guidelines set by the Office of Personnel Management and take into account the qualifications and experience of the individual, and the level and requirements of the position.

**USDA Secretary**

Federal veterinarians play a critical role in protecting animal health, safeguarding the Nation's food supply, and responding to animal disease emergencies, among other things. Like you, we at the Department of Agriculture value their contribution to U.S. agriculture and are committed to finding new ways to recruit and retain veterinarians to public service.

You may be interested to know that the Office of Personnel Management (OPM)—the office responsible for establishing compensation rates for Federal employees—is facilitating a veterinary medical officer (VMO) Talent Management Advisory Council. Among other things, the Council is tasked with making recommendations to Federal Departments for improving the compensation of Federal VMOs. Accordingly, I am forwarding a copy of your letter to OPM officials for review.



**UNITED STATES ANIMAL HEALTH ASSOCIATION**

**Resolution**

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**RESOLUTION NUMBER: 18 APPROVED**

**SOURCE:** COMMITTEE ON DIAGNOSTIC LABORATORY AND  
VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** SUPPORT FOR FOOD ANIMAL RESIDUE AVOIDANCE  
DATABANK

**BACKGROUND INFORMATION:**

The Food Animal Residue Avoidance Databank (FARAD), in existence since 1982, provides scientifically valid information on how to avoid drug, environmental and pesticide contaminant residues in food animals and helps to avert food safety crises. No other federal or private entity duplicates FARAD. FARAD develops and maintains a unique food safety databank that provides information to veterinarians, livestock producers, and state and federal regulatory and extension specialists on avoiding both animal drug residues and environmental contaminants in meat, milk and eggs. FARAD provides information regarding the time-course of drug and chemical depletion in blood and tissues of animals following the routine use of drugs in animal agriculture, for the extra-label use of drugs in animal agriculture, and during food contamination emergencies which might arise from exposure to environmental toxins, particularly pesticides, either accidentally or intentionally introduced into the food supply. Additionally, FARAD provides rapid response assistance through both its telephone hotline and web access for inquiries concerning residue issues that affect food animal health and food product contamination. FARAD provides assistance in trade matters by maintaining databanks of foreign drug approvals and it trains veterinary students and veterinary medical residents in the principles of residue avoidance.

Congress funded FARAD at \$1 million for fiscal year 2010.

**RESOLUTION:**

The United States Animal Health Association urges the President to request and the United States Congress to fund the Food Animal Residue Avoidance Databank at \$2.5 million annually.



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**RESOLUTION NUMBER: 19 APPROVED**

**SOURCE:** COMMITTEE ON DIAGNOSTIC LABORATORY AND  
VETERINARY WORKFORCE DEVELOPMENT

**SUBJECT MATTER:** SUPPORT FOR REGIONAL CENTERS OF EXCELLENCE IN FOOD  
SYSTEMS VETERINARY MEDICINE

#### **BACKGROUND INFORMATION:**

The 2008 Farm Bill created a new regional Centers of Excellence Program in food systems veterinary medicine. Centers of Excellence (Centers) would serve to train more veterinarians to address the needs of contemporary livestock and poultry enterprises in the United States. The Centers would also serve as research units, addressing such areas as production diseases (enterococcal mastitis and lameness in dairy cattle; porcine reproductive and respiratory syndrome in swine; lameness due to bone and joint disease in poultry, etc.), animal welfare issues, and environmental contamination. The Centers would have faculty supported by the United States Department of Agriculture (USDA), Agriculture and Food Research Initiative or National Institute of Food and Agriculture and would be integrated with faculty from colleges of veterinary medicine to train students either regionally or nationally about the needs of contemporary livestock and poultry production units in rural America.

Collaborations with staff veterinarians from USDA, Food Safety and Inspection Service, Animal and Plant Health Inspection Service and United States Department of Health and Human Services, Food and Drug Administration's, Center for Veterinary Medicine would provide approximately 20 training exercise days per year to veterinary students rotating through the Centers. As many as 10 to 15 students would be at the Centers at any one time for rotations lasting four to 12 weeks for in-depth training during their fourth year of veterinary college. Up to 60 veterinary students would be trained at each Center in any one year. Post-graduate training for residents and graduate students would also be offered.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the President include funding for the Regional Centers of Excellence in food systems veterinary medicine in the Annual Budget and that the United States Department of Agriculture develop regulations and implementation plans for the Centers.

USAHA requests that the House of Representatives and Senate Agriculture Appropriations Committees fund the Centers at \$15 million per year.





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**RESOLUTION NUMBER: 21 APPROVED**

**SOURCE:** USAHA/AAVLD COMMITTEE ON NAHLN

**SUBJECT MATTER:** NATIONAL ANIMAL HEALTH LABORATORY NETWORK  
LABORATORY ORGANIZATIONAL STRUCTURE

#### **BACKGROUND INFORMATION:**

The National Animal Health Laboratory Network (NAHLN) serves the nation's animal and public health communities through a state and federal partnership to ensure standardized, coordinated, and quality assured laboratory services. The NAHLN has evolved from an initial laboratory network structure involving 12 "core" laboratories to a network of 60 core, member, and contract laboratories. In 2007, the NAHLN Phase I review recommended that the current NAHLN laboratory network structure be reassessed to design an optimal network structure to achieve the current and future goals of the NAHLN. There has been limited progress made on that recommendation.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) recommends that the National Animal Health Laboratory Network (NAHLN) Coordinating Council place the highest priority on development of a draft model or models of NAHLN laboratory organizational structure (for example, numbers, types and responsibilities of laboratories) that best adheres to NAHLN principles, achieves the NAHLN objectives and delivers needed laboratory services to all stakeholders for disease surveillance, response and recovery; and that is consistent with available resources. It is intended that the model or models be shared broadly among all NAHLN stakeholders for input, feedback and modification once drafts are developed.

USAHA also recommends that an ad hoc working group be convened by the Coordinating Council to develop this draft model, and that this working group should include at minimum livestock industry representation, selected members of the NAHLN Coordinating Council, and other subject matter experts.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) appreciates the interest of the United States Animal Health Association (USAHA) in developing a model of the National Animal Health Laboratory Network (NAHLN) laboratory organizational structure. The NAHLN Coordinating Council has made discussing an optimal network structure based on strategic planning a priority in 2011. The Council's face-to-face meeting held on February 28 and March 1, 2011, focused on strategic planning and organizational structure and included stakeholder representatives solicited through the USAHA American Association of Veterinary Laboratory Diagnosticians (AAVLD) Committee on NAHLN. The preliminary draft models developed through these discussions will be provided to the

USAHA/AAVLD Committee on the NAHLN. In addition, there will be multiple opportunities provided in the future for discussions and input on the proposed models from the livestock industry, emergency management, and State animal health officials, as well as opportunities to seek feedback from all other NAHLN stakeholders.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

The National Animal Health Laboratory Network (NAHLN) Coordinating Council met on February 28 to March 1, 2011. The NAHLN Coordinating Council members represent NAHLN laboratories, the American Association of Veterinary Laboratory Diagnosticians (AAVLD), State Animal Health officials, Veterinary Services (VS), and the National Institute of Food and Agriculture (NIFA). Industry representatives also participated in the meeting to provide their perspective. Discussions focused on strategic planning of laboratory network structures and a review of the NAHLN mission, vision, and function. The models and a series of questions developed from the meeting were shared with stakeholders through the USAHA/AAVLD Committee on NAHLN in August and September. Feedback from stakeholders will be discussed at the September meeting of the NAHLN Coordinating Council. A summary of the comments will be discussed at the USAHA/AAVLD annual meeting. Additional opportunities for stakeholder input will be provided on future revisions by the NAHLN Coordinating Council.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

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**RESOLUTION NUMBER: 22 APPROVED**

**SOURCE: COMMITTEE ON BRUCELLOSIS**

**SUBJECT MATTER: UPDATING THE BRUCELLOSIS IN CERVIDAE UNIFORM METHODS AND RULES**

#### **BACKGROUND INFORMATION:**

New brucellosis serological tests for cervids have been approved and validated since September 2003, the last time the Brucellosis in Cervidae Uniform Methods and Rules was adopted.

#### **RESOLUTION:**

The United States Animal Health Association requests that the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services issue a policy statement that updates and includes all approved and validated cervid brucellosis serological tests along with appropriate diagnostic values.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes that new brucellosis serological tests are available for use in cervidae brucellosis testing. To proceed with the new direction for the brucellosis program, VS is currently revising brucellosis program rules to be consistent with the published concept paper, endorsed by the United States Animal Health Association (USAHA), and the interim rule. In conjunction with the revised rules, VS will develop brucellosis program standards to support and facilitate administration of the revised rules. Part of this process will be to develop program rules and update program standards for cervidae. The new program standards will include brucellosis serologic tests and appropriate diagnostic values for cervidae.

VS is finalizing the revised brucellosis program rules and new program standards. We will appreciate receiving input from USAHA during the comment period.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS recognizes that new brucellosis serological tests have been investigated for use in cervidae. However, these tests have not been validated by a review panel such as the United States Animal Health Association's Brucellosis Scientific Advisory Subcommittee. Prior to approving any test, VS will request an evaluation and validation of the available data by this

group. Once data associated with the use of these tests has been evaluated and approved by VS, they will be incorporated into the new brucellosis program under development. It is our intent to cover cervids in the new regulations and in the program standards that will include brucellosis serologic tests and appropriate diagnostic values for cervidae.



**UNITED STATES ANIMAL HEALTH ASSOCIATION**

**Resolution**

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**RESOLUTION NUMBER: 23 APPROVED**

**SOURCE: COMMITTEE ON BRUCELLOSIS**

**SUBJECT MATTER: BRUCELLOSIS INDEMNITY FUNDING**

**BACKGROUND INFORMATION:**

The Brucellosis Eradication Programs have been successful in eradicating brucellosis in domestic livestock through herd management test and removal with indemnity funding. Due to the increased exposure and transmission risk of brucellosis from wildlife reservoirs, individual animals and/or whole herd depopulation of affected domestic herds is occasionally necessary to control the disease. Indemnity funds are needed to ensure that the success of the eradication program is not threatened.

The lack of indemnity funding may prevent the most appropriate affected herd management tool from being properly utilized.

**RESOLUTION:**

The United States Animal Health Association requests that Congress appropriate no-year funding to be available for rapidly indemnifying newly detected domestic livestock animals and/or herds when they are found infected with *Brucella* species and depopulation is the recommended option.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

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**RESOLUTION NUMBER:** 24 APPROVED

**SOURCE:** COMMITTEE ON BRUCELLOSIS

**SUBJECT MATTER:** WINTER FEEDING OF ELK AND BISON IN THE GREATER YELLOWSTONE AREA

#### **BACKGROUND INFORMATION:**

Free ranging elk and bison in the Greater Yellowstone Area (GYA) represent the last reservoir of *Brucella abortus* in the United States and create a risk of repeated transmission of brucellosis to livestock.

Supplemental winter feeding of wild elk and bison has been practiced for decades in parts of the GYA for several reasons. Primary among these is to maintain higher elk populations to prevent commingling of brucellosis infected wildlife with livestock and to allow vaccination of elk.

However, there is significant evidence that winter feeding creates abnormal animal densities and distributions associated with increased prevalence of, and transmission potential for (both intra and inter species), density dependent diseases such as brucellosis. Winter feeding perpetuates and exacerbates the very disease such management is attempting to control and at best is only partially effective at preventing transmission to livestock as evidenced by recent transmission events.

The Greater Yellowstone Interagency Brucellosis Committee, comprised of state and federal wildlife and agriculture agencies of the GYA, reached consensus that wildlife feeding is contrary to effective disease elimination and control and issued a position statement that no new winter feedgrounds should be established.

Wild ungulate feeding in the GYA is contrary to the goal of reducing brucellosis transmission and should therefore be eventually eliminated. The United States Animal Health Association recognizes that phasing out of wild ungulate winter feeding in the GYA will need to be performed in a manner that maintains the balance between wild population abundance and available native forage across the landscape, and should include other concurrent actions to manage livestock feed depredation and commingling.

#### **RESOLUTION:**

The United States Animal Health Association urges the wildlife agencies of the Greater Yellowstone Area (GYA) states to not establish additional public or private feedgrounds and consider decreasing and eventually phasing out winter feeding of elk and bison in the GYA.

#### **RESPONSE:**

##### **Idaho Dept of Fish and Game**

IDFG supports your association's goal of reducing the risk of brucellosis transmission and we are committed to maintaining a cooperative working relationship with ISDA to implement solutions that meet the needs of

livestock producers and fulfills our statutory authority to manage wildlife for the benefit of Idaho citizens.

**Wyoming Game and Fish Dept**

This is an issue of utmost importance to the people of Wyoming. The Department continues to explore options to reduce or eliminate feeding on a case-by-case basis and will continue to work toward finding solutions to this complex problem.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

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**RESOLUTION NUMBER: 26 APPROVED AS AMENDED**

**SOURCE:** COMMITTEE ON PHARMACEUTICALS

**SUBJECT MATTER:** SUPPORT FOR ANTIBIOTIC USE IN ROUTINE LIVESTOCK AND POULTRY DISEASE TREATMENT, CONTROL, AND PREVENTION

#### **BACKGROUND INFORMATION:**

The use of antimicrobial agents for disease treatment, control and prevention in animals is fundamental to animal health and well-being. The judicious use of antimicrobials is one of the most important tools that veterinarians have to protect human and animal health, and the use of veterinary drugs, when necessary, is essential to treat, control, and prevent animal disease. Multiple layers of protection are in place to ensure that the use of antimicrobial agents for maintaining animal health does not harm public health: Food and Drug Administration (FDA) assessment of antimicrobial agents, determination of drug withdrawal time, and approval process for use; FDA post-approval monitoring; multi-agency guidelines for judicious therapeutic use of antimicrobial agents; the multi-agency National Residue Program with its rigorous processes for approval, sampling and testing, and enforcement; the National Antimicrobial Resistance Monitoring System; and public and private monitoring and surveillance systems for emergence of antimicrobial resistance. Congressional efforts to further regulate the use of antimicrobial agents in food-producing animals without thorough, evidenced-based risk assessments threaten the ability to protect animal health. The continued availability of safe, effective antimicrobials for veterinary medical use, including the retention of currently approved drugs and the future approvals of new drugs, are critical components to ensure a safe food supply and are essential to the improvement of animal health and welfare.

Some opponents of antimicrobial use in livestock and poultry suggest that routine use of antimicrobials is a matter of rote procedure, without thought or medical basis, regardless of whether or not there is a need for antimicrobial use. This perception is inaccurate. Livestock and poultry production is a routine, predictable process, yet requires a great deal of precise monitoring of animal health and disease conditions.

Unlike humans, livestock and poultry raised for food are typically selectively bred, genetically similar, and raised in controlled environments to produce a specific uniform product that is safe, wholesome, and meets the expectations of the consumer. Therefore, many of the potential diseases that may affect these animals can be predicted and prevented by a veterinarian. If a disease is predictable and preventable, it is prudent for the veterinarian to recommend therapy to prevent the disease and to alleviate the pain and suffering associated with the disease. Likewise, if an infectious disease is diagnosed in a herd or flock, it is incumbent upon the veterinarian to initiate appropriate therapy to minimize further disease spread and alleviate associated pain and suffering. Antimicrobial therapy should not be categorically presumed to be injudicious based on quantity, frequency, or duration of use, particularly if the recommendation has been made by a veterinarian.



**RESOLUTION:**

The United States Animal Health Association (USAHA) urges the United States Department of Health and Human Services, Food and Drug Administration (FDA), Center for Veterinary Medicine to strongly support the continued availability and judicious use of antibiotics for disease treatment, control, and prevention. The USAHA also urges the FDA to work collaboratively with the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services and animal industry organizations to develop and expand outreach on judicious uses of antibiotics to ensure the maintenance of a healthy animal population.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

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**RESOLUTION NUMBER:** 27 APPROVED

**SOURCE:** COMMITTEE ON PHARMACEUTICALS

**SUBJECT MATTER:** SUPPORT FOR VETERINARY CONSULTATION IN ANTIBIOTIC USE

#### **BACKGROUND INFORMATION:**

Some antimicrobials are available in various forms (feed, injectable, intramammary, etc) as over the counter (OTC) drugs without veterinary prescription. The level of veterinary oversight and involvement in the use of OTC antimicrobials is arguable, as is their contribution to human antimicrobial resistance trends. Some antimicrobials require a veterinary prescription and are regulated by individual states. Although the American Veterinary Medical Association Principles of Veterinary Medical Ethics indicate that dispensing or prescribing a prescription product requires a Veterinarian-Client-Patient Relationship (VCPR), not all state veterinary practice acts, and therefore state laws, require a VCPR to prescribe a veterinary prescription product. Nearly all feed grade antimicrobials are available OTC, yet a few feed grade antimicrobials, known as Veterinary Feed Directives are regulated by the Food and Drug Administration (FDA) and specifically require a VCPR as defined by the FDA.

The FDA has outlined in draft guidance #209, recommendations to increase requirements for veterinary oversight of antimicrobial use in animals as a component of implementing a policy on the judicious use of medically important antimicrobials also used in human medicine. Many other groups also suggest that increased veterinary oversight of antimicrobials would be beneficial to both human and animal health. Some suggest a prescription only status be implemented for all veterinary antimicrobials to provide a comparable level of control over antimicrobials in veterinary medicine as exists in human medicine. Current regulatory and statutory authority and logistical challenges, such as veterinary workforce shortage, and lack of framework, impedes immediate implementation of such a policy.

Given the current system and availability of OTC veterinary antimicrobials, the onus lies with the client or producer to seek veterinary consultation prior to use of antimicrobials to ensure that the drugs are used appropriately and judiciously in the interest of both animal and human health. While it is clear that the expertise of a veterinarian is invaluable in determining the necessity and appropriate use of antimicrobials, the availability of OTC products precludes the veterinarian from responsibility for ensuring that clients and producers comply with label instructions for OTC products.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) strongly urges the United States Department of Health and Human Services, Food and Drug Administration (FDA) to develop and support educational efforts directed toward clients and producers to seek veterinary consultation prior to the use of antimicrobials to ensure judicious and appropriate use. Furthermore, the USAHA recommends that the FDA exercise its enforcement authority to discourage illegal uses of over the counter antimicrobials that are likely to occur without veterinary consultation.



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**RESOLUTION NUMBER: 28 APPROVED**

**SOURCE:** COMMITTEE ON INFECTIOUS DISEASES OF HORSES

**SUBJECT MATTER:** DEVELOPMENT OF FRAMEWORK FOR EQUINE HEALTH PROGRAM WITH EMPHASIS ON EQUINE INFECTIOUS DISEASES

#### **BACKGROUND INFORMATION:**

The United States equine industry is both domestic and international in scope. Horses move frequently for breeding, competition and recreation. Horses are frequently exported and imported on both a permanent and temporary basis. The ability to move horses is critical to the industry. The freedom to move horses is based on policies and safeguards that protect the health of the horses and the economic stability of the equine industry. The intrastate, interstate and international movement of horses is regulated through multiple mechanisms including policies overseen by the United States Department of Agriculture (USDA), state animal health authorities and foreign countries. Privately owned facilities and equine events also implement requirements for the entry and participation of horses moved onto such venues. Effective control of equine infectious diseases must involve preplanning and communication between those involved in the promotion of the health of horses including the individual owner, the venue managers, the industry associations, state animal health officials and USDA.

The equine industry incurs costs during disease outbreaks due to enhanced testing, movement restrictions, treatment required for sick animals, cancellation of equine events, and equine mortality. To optimize equine health through the control of equine infectious diseases, a framework document is required to develop a comprehensive United States Equine Health Plan. The framework document would be followed by the addition of more detailed, specific plans.

A workshop co-hosted by USDA and the American Horse Council in June of 2010 provided the opportunity for a broad representation from the equine industry to discuss roles and responsibilities for equine infectious disease control. To become more informed of equine infectious disease issues, representatives at the workshop worked through two equine disease case scenarios to identify and discuss control options. One clear outcome from the workshop was the need for the equine industry to have a formal equine health plan outlining the issues surrounding the prevention, diagnosis, and control of equine infectious disease and the responsibilities and roles of the federal government, state authorities, and the industry in this effort. The critical first step is development of a framework document for a USDA Equine Health Program.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services dedicate the necessary resources for continued collaboration with industry to develop a framework document for an Equine Health Program, with an initial emphasis on prevention and control of infectious diseases. The USAHA further requests that equine industry representatives,

state animal health officials and a representative from the USAHA Committee on Infectious Diseases of Horses be included in the preplanning process in the development of the framework document. Further, USAHA requests that the completed framework document be shared with a broader group of state animal health officials and equine stakeholders for further input to develop a more detailed plan and to prioritize areas of focus for disease monitoring and disease containment.

**INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes the economic contribution of the equine industry to U.S. animal agriculture and the benefits to individuals and society derived from equine ownership.

VS appreciates the interest of the United States Animal Health Association (USAHA) in developing a national framework to address equine health issues. This framework document will be a first step toward addressing potential vulnerabilities in the safeguarding system for the equine industry.

While immediate and long-term budget uncertainties prevent us from making commitments regarding future funding requests for equine health, VS is committed to providing resources and guidance to develop a framework document that can be a basis for establishing a national equine health program. VS will continue to work closely with the USAHA Infectious Diseases of Horses Committee and other external stakeholder groups as this new initiative moves forward.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) acknowledges the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS recognizes the economic contribution of the equine industry to U.S. animal agriculture and the benefits to individuals and society derived from equine ownership.

VS also appreciates the interest of the United States Animal Health Association (USAHA) in developing a national framework to address equine health issues and is supportive of this concept. Such a framework could be a first step toward addressing potential vulnerabilities in a safeguarding system for the equine industry. However, immediate and long-term budget uncertainties prevent VS from making any substantial commitment to, or additional funding requests for, equine health at this time. VS will continue to work closely with USAHA's Committee on Infectious Diseases of Horses and other external stakeholder groups as we move forward on this framework.



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**RESOLUTION NUMBER: 29 APPROVED**

**SOURCE: COMMITTEE ON INFECTIOUS DISEASES OF HORSES**

**SUBJECT MATTER: CANADIAN EQUINE PIROPLASMOSIS IMPORT REQUIREMENTS**

#### **BACKGROUND INFORMATION:**

Recently, there has been increased concern over the differences in the United States and Canadian import test requirements for equine piroplasmosis (EP). For importation, Canada requires a negative EP immunofluorescent antibody test or, where applicable, an alternate test acceptable to the Canadian Food Inspection Agency. Horses imported into Canada from other countries may move into the United States after spending at least 60 days in Canada with no further EP testing. This effectively allows horses from EP-endemic countries to enter the United States without fulfilling the United States requirement of a negative EP competitive enzyme linked immunosorbent assay (cELISA) test.

In recent testing of EP-positive horses in the United States, the cELISA has been more sensitive than the IFA in detecting sero-positive animals.

#### **RESOLUTION:**

The United States Animal Health Association strongly urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service, Veterinary Services, National Center for Import and Export to meet with the Canadian Food Inspection Agency to discuss equine piroplasmosis (EP) import testing and the maintenance of EP freedom in North America. This meeting should be dedicated exclusively to the topic of EP and, if necessary, be facilitated by USDA traveling to Canada.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes that standardizing equine piroplasmosis testing methods between the United States and Canada could be beneficial to both countries. VS is requesting a technical meeting with the Canadian Food Inspection Service to discuss the sensitivity of assays used in each country for detecting seropositive horses and how import testing might be further harmonized.

#### **FINAL RESPONSE**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS recognizes that standardizing equine piroplasmosis (EP) testing methods between the United States and Canada could be beneficial to both countries. VS has scheduled a technical meeting with the Canadian Food Inspection Agency on September 15, 2011. Meeting participants will discuss the sensitivity of assays used in each country for detecting seropositive horses and how import testing might be further harmonized to achieve the maintenance of EP freedom in North America.



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**RESOLUTION NUMBER: 30 APPROVED**

**SOURCE: COMMITTEE ON INFECTIOUS DISEASES OF HORSES**

**SUBJECT MATTER: EQUINE PIROPLASMOSIS WORKING GROUP  
RECOMMENDATIONS**

#### **BACKGROUND INFORMATION:**

In November 2009, the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services established an Equine Piroplasmosis Working Group (EPWG) to study the occurrence of equine piroplasmosis (EP) in the United States and to make recommendations for its management. In February 2010, the EPWG submitted interim recommendations that were implemented in the March 2010 version of VS Memorandum 555.20. The EPWG recently completed a set of long-term recommendations that includes more comprehensive perspectives and recommendations. These additional recommendations on response to domestic EP findings include surveillance, education and outreach, research needs, importation of horses, data gaps and data analysis needs, national perspectives, and the current EP disease status of the United States. A final version of this document was distributed to state and industry representatives for review and comments. The comment period was extended through October 2010.

#### **RESOLUTION:**

The United States Animal Health Association urges the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services to consider submitted public comments on the April 2010 Equine Piroplasmosis Working Group Long-Term Recommendations and promptly accept and implement those recommendations.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) appreciates the interest of the United States Animal Health Association (USAHA) in addressing equine piroplasmosis (EP) in the United States. VS has reviewed the long-term recommendations for managing EP submitted by the Equine Piroplasmosis Working Group (EPWG). VS is also identifying what resources are available to implement those recommendations in light of immediate and long-term budget uncertainties.

VS will continue to work closely with the EPWG, the membership of the USAHA Infectious Diseases of Horses Committee, and other external stakeholder groups as we determine how best to implement the EPWG's recommendations.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) appreciates the interest of the United States Animal Health

Association (USAHA) in addressing equine piroplasmosis (EP) in the United States.

VS has reviewed the long-term recommendations for managing EP submitted by the Equine Piroplasmosis Working Group (EPWG). VS is also identifying what resources are available to implement those recommendations in light of immediate and long-term budget uncertainties. VS will continue to work closely with the EPWG, the membership of the USAHA Committee on Infectious Diseases of Horses, and other external stakeholder groups as we determine how best to implement the EPWG's recommendations.





## UNITED STATES ANIMAL HEALTH ASSOCIATION

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**RESOLUTION NUMBER: 31 APPROVED**

**SOURCE: COMMITTEE ON INFECTIOUS DISEASES OF HORSES**

**SUBJECT MATTER: EQUINE PIROPLASMOSIS – CLEARANCE TEST RESEARCH**

#### **BACKGROUND INFORMATION:**

Equine piroplasmosis (EP) is classified as a foreign animal disease. The identification of EP-positive imported equids prior to the designation of the competitive enzyme-linked immunosorbent assay (cELISA) test as the official test in August 2005 and the recent large-scale EP incident in a domestic population of horses have increased the need and interest for an effective treatment in the management of EP-positive equids identified in the United States. The research advances by the United States Department of Agriculture, Agricultural Research Services in the development of an aggressive EP treatment protocol have shown encouraging results for the limited number of horses that have completed the treatment protocol. This progress necessitates not only continued research and refinement of protocols, but also the development and validation of a post-treatment clearance assay for determining and monitoring the status of equids following completion of an approved treatment protocol.

#### **RESOLUTION:**

The United States Animal Health Association requests the United States Department of Agriculture, Agricultural Research Service to prioritize and fund the research for a safe and effective treatment for elimination of the carrier state for *Babesia caballi* and *Babesia equi* and for the development and validation of a post-treatment clearance assay for establishing and monitoring the status of equids following approved equine piroplasmosis treatment protocols.

#### **RESPONSE:**

##### **USDA ARS**

As you know, ARS has an active research program at our Pullman, Washington location to solve problems related to equine piroplasmosis. We agree that this work is critical to ensuring the protection of the U.S. horse population. Although immediate and long-term budget uncertainties prevent us from making any commitments regarding funding requests, we will consider your input as we formulate future budget initiatives for Congress.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

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**RESOLUTION NUMBER: 32 APPROVED AS AMENDED**

**SOURCE: COMMITTEE ON INFECTIOUS DISEASES OF HORSES**

**SUBJECT MATTER: EQUINE PIROPLASMOSIS IMPORTS PRIOR TO 2005**

#### **BACKGROUND INFORMATION:**

In August 2005, the official test for equine piroplasmosis (EP) on equids entering the United States was changed from Complement Fixation (CF) to the competitive Enzyme-Linked Immunosorbent Assay (cELISA). This change was a result of disclosure that the rate of false negative CF test results was unacceptably high. It is suspected that an unknown number of EP positive equids may have entered the United States in the years prior to 2005 due to inaccurate CF test results. Increased awareness, as a result of newly detected cases of EP in the United States, has led a number of states and equine events to implement test requirements for *Babesia equi* and/or *Babesia caballi*. The resulting increase in testing led to the identification of EP-positive horses in the imported horse population. The November 1, 2010 National EP Situation Report indicates 17 EP-positive imported horses have been found so far this year. Identifying possible at-risk imported horses would facilitate disease surveillance efforts in states and the nation.

#### **RESOLUTION:**

The United States Animal Health Association requests the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), National Center for Import and Export (NCIE) to provide, upon request, individual states with owner and animal information for all equids imported into the United States since 1995. USDA-APHIS-VS-NCIE should provide owner and imported horse information to the respective chief animal health official of the state of destination of the imported horse at the time of release of the equid from the United States equine import facilities.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services, National Center for Import and Export (NCIE) agrees with the United States Animal Health Association's request. NCIE will provide the information to States that request it.

#### **FINAL RESPONSE**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS National Center for Import and Export (NCIE) agrees with the United States Animal Health Association's request. To date, VS has received one request from one State for information about horses previously imported. The requested information has been provided to that State. VS has agreed to provide information upon request from the appropriate State officials.



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**RESOLUTION NUMBER: 33 APPROVED AS AMENDED**

**SOURCE: COMMITTEE ON BIOLOGICS AND BIOTECHNOLOGY**

**SUBJECT MATTER: UPDATING ANTIQUATED TESTING REQUIREMENTS FOR ANIMALS USED IN THE PRODUCTION OF LICENSED SERUM ANTIBODY PRODUCTS**

#### **BACKGROUND INFORMATION:**

Code of Federal Regulations (CFR) Chapter 9, 113.450 details the general requirements for antibody products. In part (c) Animals, it states that "all animals used in the manufacturing of antibody products shall be individually subjected to applicable tests for infectious diseases". Specifically, donor horses will be tested for equine infectious anemia (EIA), piroplasmiasis, dourine, glanders and brucellosis upon arrival and again annually for EIA and brucellosis (if "housed" with other species). Donor cattle will be tested for brucellosis and tuberculosis upon arrival and annually. These test requirements have been in place for decades without any amendment. For many years, dourine and glanders have been eradicated from the United States (US) and are therefore classified as foreign animal diseases. *Brucella abortus* has been eradicated in the US except for the Greater Yellowstone Area. For this reason, some laboratories are now charging for brucellosis testing. There have been recent outbreaks of piroplasmiasis and tuberculosis in different parts of the United States. There have been efforts by the United States Department of Agriculture (USDA) and private industry to improve tuberculosis (TB) testing in recent years to eliminate false positives. Gamma interferon testing has proven to be a very reliable confirmatory test for TB suspect animals in recent outbreaks (presentation/report - TB committee, 2010 United States Animal Health Association). The percentage of test-positive EIA samples in the United States has decreased dramatically from nearly 4 percent in 1972 to less than 0.01 percent in 1998. EIA prevalence in the United States is estimated to be less than 8:100,000 (USDA, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) info sheet, Sept. 2006). Required pasteurization of equine serum products at 58-59° C for 60 minutes (9-CFR.450 (e) 1) will also inactivate any blood born EIA virus. Brucellosis in horses causes fistulous withers and with the effective eradication program in domestic bovines it is now virtually eradicated in equine (last confirmed US case in equine was many years ago).

Problems encountered by firms with animals tested include: 1.) Cost (\$72/head for dourine, glanders, piroplasmiasis at the National Veterinary Services Laboratory. \$6/head for EIA and \$4/head for *Brucella* (RMRAHL). 2.) False positives (infrequent with EIA, common with TB, *Brucella*, and occasionally with glanders and dourine). Ramifications from false positives can result in a log jam in quarantine pens for new arrivals. TB false positive incidence seems to increase with time in hyperimmunized production animals that have never left a plant site. This results in multiple visits and re-tests by USDA-APHIS veterinarians and, in some cases, removal of valuable production animals that have to be slaughtered only for the Veterinary Medical Officer to confirm at NVSL that there are no TB lesions. During these times animal movement on or off the plant can also be affected. TB testing should only be necessary for incoming donor animals and not repeated every year thereafter if they never leave the premises (unless sold or

dead). 3.) *Brucella* testing steers and horses. This should not be necessary for castrated cattle or horses and at a minimum should possibly only be required upon arrival, especially if these animals originate from a *Brucella* class free state. Re-testing steer and horses every year that never leave the premises unless sold or dead makes no sense. 4.) Why is there a continued need to test horses for dourine and glanders considering that these diseases have not been reported in the United States for many years?

**RESOLUTION:**

The United States Animal Health Association (USAHA) requests that United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services update regulations regarding testing for infectious diseases in serum antibody production animals in 9-CFR 113.450 in order to eliminate unnecessary and costly testing. USAHA requests: 1) That testing for dourine and glanders for incoming horses no longer be required for United States origin horses, 2) That annual tuberculosis (TB) testing for donor cattle no longer be required after an initial negative test upon arrival, if the animal originates from a TB-free area and never leaves the premises, and 3) That initial and annual *Brucella* testing in steers and horses be discontinued as a requirement, especially if these animals originate from a *Brucella*-free classified state.

**INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) appreciates the concerns of the United States Animal Health Association regarding eliminating unnecessary testing in serum antibody production animals. APHIS has reviewed the concerns expressed in the resolution and largely agrees with those concerns. VS' Center for Veterinary Biologics plans to publish a notice that provides new guidance to the industry regarding testing requirements for animals used in the production of serum and antibody products. In the interim, we will work with manufacturers on an individual basis to address their specific concerns.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS Center for Veterinary Biologics is currently drafting a document to provide new guidance to industry regarding testing requirements for animals used in the production of serum and antibody products. In the interim, VS will work with manufacturers on an individual basis to address their specific concerns.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

**RESOLUTION NUMBER: 34 APPROVED AS AMENDED**

**SOURCE:** COMMITTEE ON BLUETONGUE AND RELATED ORBIVIRUSES

**SUBJECT MATTER:** REMOVAL OF RECENTLY ISOLATED BLUETONGUE VIRUS TYPES FROM THE SELECT AGENT LIST

#### **BACKGROUND INFORMATION:**

In the United States, bluetongue virus (BTV) serotypes 2, 10, 11, 13 and 17 have historically been considered to be endemic. Of these, BTV-2 is restricted to the southeastern United States, primarily Florida, whereas the others are more widespread and occur seasonally or year-round throughout much of the continental United States south of the so-called "sonorensis line." Since 1999, the National Veterinary Services Laboratory has identified 36 isolates of "non-endemic" or "previously exotic" BTVs from wild and domestic ruminants in the southeastern United States. At least one isolate has been obtained from samples taken in each of 6 southeastern states (Arkansas, Florida, Louisiana, Mississippi, Oklahoma, Texas); the majority have been identified in samples originating from Florida. A total of 10 previously unrecognized BTV serotypes have been identified to date (serotypes 1, 3, 5, 6, 9, 12, 14, 19, 22, 24). Of these, BTV-3 has been the most frequent and has now been found in 4 states; isolations of BTV-3 have been made in 7 of the past 12 years. BTV-1, BTV-12, and BTV-14 have also been isolated outside of Florida. None of these "previously exotic" BTVs has caused widespread disease outbreaks. The *Culicoides* spp. vectors responsible for transmission of these new virus serotypes are unknown.

It is important to note that these isolations have been made without comprehensive surveillance. The United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services select agent classification of any "non endemic" BTV serotype (i.e. other than serotypes 2, 10, 11, 13 and 17) restricts the ability of United States' diagnosticians and scientist to improve detection methods or to conduct epidemiological studies or undertake research on these BTV-types, despite the fact they are apparently now well-established and even widespread in a substantial portion of the country.

#### **RESOLUTION:**

The United States Animal Health Association urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) to remove ten serotypes of bluetongue virus (serotypes 1, 3, 5, 6, 9, 12, 14, 19, 22, and 24), formerly recognized as exotic that have been identified in the continental United States since 1999 and epidemiological evidence reported to this committee indicates that these viruses are now endemic in regions of the United States, from the USDA-APHIS-VS list of select agents.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) appreciates the interest of the United States Animal Health Association in removing 10 serotypes of bluetongue virus that are now endemic in the United States from VS' list of select agents. Agricultural select agents such as bluetongue are pathogens that pose a severe threat to animal or plant health. Exotic bluetongue is currently on the list of select agents as a VS-only agent.

The Agricultural Bioterrorism Protection Act of 2002 requires a biennial review of the lists of select agents and revision as necessary in accordance with the law. An internal VS select agent review committee comprised of seven scientific experts from USDA (APHIS, Agriculture Research Service, and the National Institute of Food and Agriculture) and one from the Department of Homeland Security developed a method to evaluate each agent to fulfill this requirement.

In addition, Executive Order (EO) 13546, "Optimizing the Security of Biological Select Agents and Toxins in the United States," was signed in July 2010. This EO established a Federal Experts Security Advisory Panel (FESAP) from multiple Federal departments to provide recommendations to USDA on, among other things, reducing the number of agents on the select agent list. FESAP forwarded its recommendations to APHIS.

VS published an Advanced Notice of Proposed Rulemaking (ANPR) on July 29, 2010, to solicit public comments on changes to the list of select agents. We have received comments and evaluated them. Recommendations from the VS select agent review committee, FESAP, and ANPR comments are being reviewed and considered for publication. EO 13546 established timeframes for publishing regulatory changes. A proposed rule must be published no later than 15 months from the date of the EO (October 2011). VS encourages USAHA to submit comments regarding bluetongue when the proposed rule is published. A final rule is to be published no later than 27 months from the date of the EO (October 2012).

Removing an agent from the select agent list does not mean that it is no longer regulated. APHIS still regulates animal pathogens under title 9 of the *Code of Federal Regulations*, part 122 (Organisms and Vectors), and the Virus and Serum Toxin Act, which require permitting and laboratory inspection of animal pathogens that are imported or moved interstate.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS appreciates the interest of the USAHA in removing 10 serotypes of bluetongue virus that are now endemic in the United States from VS' list of select agents. Agricultural select agents are pathogens that pose a severe threat to animal and plant health. Exotic bluetongue is currently on the list of select agents as a VS-only agent.

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UNITED STATES ANIMAL HEALTH ASSOCIATION

Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER: 36 APPROVED**

**SOURCE: COMMITTEE ON TUBERCULOSIS**

**SUBJECT MATTER: ELEPHANT TUBERCULOSIS GUIDELINES**

**BACKGROUND INFORMATION:**

The emergence of tuberculosis (TB), *Mycobacterium tuberculosis*, in elephants in 1996 prompted the formation of an advisory panel to draft guidelines for the control of tuberculosis in elephants. Since that time various modifications of the guidelines have been drafted. The proposed 2010 guidelines incorporate several changes including additional clarification and requirements within the TB management group options for culture positive or serologically reactive elephants.

The 2008 guidelines called for annual testing by the triple culture method (3 trunk wash samples) and a single sample of serum collected for analysis by the ElephantTB Stat-Pak<sup>®</sup> Assay and, where warranted, by the Chembio Diagnostic Systems Inc., MAPIA<sup>™</sup>. The ElephantTB Stat-Pak<sup>®</sup> Assay was approved and licensed by United States Department of Agriculture (USDA), Center for Veterinary Biologics in 2007. The 2010 proposed guidelines allow use of a newly developed serological test – Chembio Diagnostic Systems, Inc., Dual Path Platform (DPP<sup>®</sup>) VetTB Assay which was evaluated by Greenwald *et.al* in 2009. The proposed guidelines for treatment and movement restrictions would also include serological results and *Mycobacterium tuberculosis* complex exposure history.

A Subcommittee of the United States Animal Health Association (USAHA) Committee on Tuberculosis was formed at the 2007 USAHA annual meeting to review and comment on proposed guidelines and was charged by the TB Committee Chair in 2010 to review the 2008 guidelines in light of new scientific publications and data collected from official USDA diagnostic testing.

**RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the United States Department of Agriculture, Animal and Plant Health Inspection Service, Animal Care adopt and implement the “Guidelines for the Control of Tuberculosis in Elephants 2010.”

**RESPONSE:**

**USDA, Animal and Plant Health Inspection Service, Animal Care** intends to utilize the 2010 guidelines after following a transparent process that includes notification of stakeholders and development of an implementation plan.





## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

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**RESOLUTION NUMBER: 38 APPROVED**

**SOURCE: COMMITTEE ON TUBERCULOSIS**

**SUBJECT MATTER: NATIONAL TUBERCULOSIS ERADICATION PROGRAM**

#### **BACKGROUND INFORMATION:**

Adequate surveillance is a key component of any successful disease eradication program. Private veterinary practitioner involvement in the United States Bovine Tuberculosis eradication program through administration of the Caudal Fold Tuberculin (CFT) Test on cattle has been a critical component of the eradication efforts. The sensitivity and specificity of the CFT has been well documented, and therefore minimum guidelines have been established by the United States Department of Agriculture (USDA), Animal Plant Health Inspection Service, Veterinary Services using validated statistical methods. A known false positive rate (approximately 1 percent or greater) for the test allows for general evaluation of veterinary compliance in administering the test. USDA tracks the CFT response rate for each state and releases general compliance numbers as part of its annual reporting system.

Although much progress has been made by the state animal health agencies in educating private veterinary practitioners on test technique and monitoring their statewide compliance with expected test results, a number of states continue to experience sub-par CFT response rates. Between the years 2006 and 2009 the number of states with a CFT response rate of less than 0.25 percent has been 11, 12, 13, and 12 respectively. This indicates that progress in enforcing acceptable CFT response rates by state animal health officials continues to be a challenge. USDA currently does not release complete information correlating state CFT statistics with the specific states involved. Identification of those states in compliance and those that are not should be available.

#### **RESOLUTION:**

The United States Animal Health Association requests that the United States Department of Agriculture, Animal and Plant Health Inspection Services, Veterinary Services release complete Caudal Fold Tuberculin (CFT) Test information as part of their annual report for all 50 states, beginning in 2009, including the name of the state, total number of cattle tested, and the correlating CFT response rate.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) is supportive of the United States Animal Health Association's Committee on Tuberculosis request to provide State-level information for caudal fold tuberculin (CFT) test response rates.

VS will rely on the National Assembly of State Animal Health Officials as the primary venue for sharing CFT results. We plan on summarizing information taken from each

State's TB annual report that includes the number of cattle tested with the CFT, the number of responders reported, a State-level CFT response rate, the number of accredited veterinarians conducting CFT tests, the number of accredited veterinarians accumulating 300 or more CFT tests, the number of accredited veterinarians meeting or exceeding the performance standard; and the percent of accredited veterinarians meeting or exceeding the performance standard for each State.

A template of this report will be shared with the National Assembly for review and input before it is finalized. Once finalized, we will move forward with formal reporting of this information. The report will also be posted on the APHIS Web site.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS is supportive of the request by the USAHA's Committee on Tuberculosis to provide State-level information for caudal fold tuberculin (CFT) test response rates.

VS will rely on the National Assembly of State Animal Health Officials as the primary venue for sharing CFT results. Based on input from the National Assembly, we have developed a template that summarizes the information taken from each State's tuberculosis annual report, which includes the number of cattle tested with the CFT, the number of responders reported, a State-level CFT response rate, the number of accredited veterinarians conducting CFT tests, the number of accredited veterinarians accumulating 300 or more CFT tests, the number of accredited veterinarians meeting or exceeding the performance standard, and the percent of accredited veterinarians meeting or exceeding the performance standard for each State.

The template of this report will be shared with the National Assembly for review and input before it is finalized. Once finalized, we will move forward with formal reporting of this information tentatively scheduled in early 2012. The report may also be posted on the APHIS Web site.



**UNITED STATES ANIMAL HEALTH ASSOCIATION**

**Resolution**

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER: 39 APPROVED**

**SOURCE: COMMITTEE ON TRANSMISSIBLE DISEASES OF SWINE**

**SUBJECT MATTER: COMPREHENSIVE AND INTEGRATED SWINE DISEASE SURVEILLANCE IMPLEMENTATION**

**BACKGROUND INFORMATION:**

The United States Department of Agriculture (USDA) and the United States pork industry have made significant progress in the development of the infrastructure necessary for implementing a comprehensive and integrated surveillance system (CISS) for swine diseases. The United States pork industry continues to implement the Swine Identification Plan which will support risk-based surveillance and statistically significant sampling from swine populations. The industry has also continued to prioritize and communicate surveillance objectives for inclusion in a CISS for swine diseases.

Critical for implementation of CISS is the role of the USDA, Animal and Plant Health Inspection Service, Veterinary Services, National Surveillance Unit to balance surveillance objectives with available surveillance streams, estimate costs and provide analysis back to the US pork industry. For various reasons due to issues with infrastructure and resources, which have recently been addressed with targeted funding for CISS, this process has not occurred for previously identified surveillance objectives thus limiting CISS implementation.

**RESOLUTION:**

The United States Animal Health Association (USAHA) urges the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) National Surveillance Unit to make the implementation of industry surveillance priorities, through appropriate surveillance streams and the communication of the results, a high priority to be completed in the first quarter of calendar year 2011. A progress report from USDA-APHIS-VS should be provided to the Swine Species Committee at the 2011 National Institute of Animal Agriculture annual meeting and to USAHA Committee on Transmissible Diseases of Swine.

**INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association over the Comprehensive and Integrated Surveillance System (CISS) for swine diseases and appreciates the opportunity to respond. VS has been developing plans for, and implementing portions of, a comprehensive surveillance system for swine since 2004.

The Center for Epidemiology and Animal Health's National Surveillance Unit and the National Centers for Animal Health Programs staff have implemented segments of a comprehensive and integrated surveillance infrastructure, based on surveillance streams. Surveillance streams are defined as discrete points of accessibility for gathering information and samples for one or more swine diseases or conditions of interest.

VS has made progress developing new surveillance programs for classical swine fever (CSF) and swine influenza virus (SIV). These programs use valuable streams, including using diagnostic laboratory submissions via the National Animal Health Laboratory Network and high-risk herd sample selection for CSF and pseudorabies virus (PRV). In fiscal year 2010, VS advanced comprehensive surveillance by implementing stream-based PRV surveillance protocols and implementing SIV surveillance in diagnostic laboratories.

Funding, data sharing, and current traceability initiatives are affecting CISS implementation. We are discussing with stakeholders the importance of voluntarily sharing data and other traceability concerns that are instrumental for successful CISS implementation. We welcome USAHA's input. VS will provide an interim report outlining current surveillance activities, including CISS-related surveillance, at the National Institute for Animal Agriculture annual meeting.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS recognizes the concerns of the USAHA regarding the comprehensive and integrated surveillance system (CISS) for swine diseases and appreciates the opportunity to respond. VS has been developing plans for, and implementing portions of, a comprehensive surveillance system for swine since 2004.

VS made further progress on CISS in fiscal year 2011. We met with industry representatives in December 2010 to discuss their priorities for surveillance, and in response have begun developing a surveillance plan for African swine fever (ASF). We have explored using alternate tissues for ASF testing; preliminary results suggest that tonsil submitted for classical swine fever (CSF) surveillance is suitable for ASF testing, potentially reducing costs while achieving an expanded surveillance goal. VS has also completed negative cohort laboratory studies in the National Animal Health Laboratory Network system for foot-and-mouth disease, ASF, and rinderpest. Comprehensive surveillance also includes non-disease specific surveillance. We have developed national protocols to monitor slaughter condemn data for health anomalies.

VS purchased off-the-shelf software for surveillance and disease management, and we are integrating it into our information system. Until the new software is fully implemented, we are standardizing and improving data quality for pseudorabies virus and swine influenza virus.

The development of comprehensive swine surveillance is an ongoing effort, and we are striving to communicate fully with stakeholders as we proceed. Staff delivered a status report at the National Institute of Animal Agriculture meeting in April. We have been discussing increased data sharing with stakeholders, and we are consulting with our legal unit regarding data confidentiality. VS has been working with industry to identify and rectify issues related to the industry pink premises tag system for targeted surveillance.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

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**RESOLUTION NUMBER:** 40 APPROVED

**SOURCE:** COMMITTEE ON TRANSMISSIBLE DISEASES OF SWINE

**SUBJECT MATTER:** NATIONAL ANIMAL HEALTH MONITORING SYSTEM SWINE 2012

#### **BACKGROUND INFORMATION:**

The National Animal Health Monitoring System (NAHMS) is a program through which national studies are conducted by combining the efforts of multiple government agencies, producers and other industry representatives, academic institutions, and public and animal health professionals. These efforts are organized by a multidisciplinary group within the Centers for Epidemiology and Animal Health, a unit within the United States Department of Agriculture, Animal and Plant Health Inspection Service. This unit is composed of veterinary epidemiologists, livestock commodity specialists, statisticians, a trade economist, a technical communicator, and technical support staff.

There have been four previous national swine studies (1990, 1995, 2000 and 2006) and each has provided population estimates of critical industry benchmarks through a series of reports. All respondent identification is strictly confidential. These estimates have documented progress in management systems over the years, disease prevalence and factors related to swine health. Both biologic and survey data collected have been responsible for many manuscripts and special runs of data may be requested. These studies have also served to support export markets, focus attention to developing better treatment regimens, and have given researchers the resources for studies aligned with industry priorities. NAHMS data on antimicrobial use has provided scientific information which has been used at Congressional hearings on antimicrobial resistance. These national swine surveys are unique and provide an opportunity for a high level of cooperation between federal and industry sectors.

Benefits that can be derived from past and future NAHMS surveys include: cooperation between the National Surveillance Unit and industry; sound statistical representation of the industry; modeling of surveys to meet industry priorities; clear communication of industry trends; resources for further research; and biological samples to be banked for future study.

#### **RESOLUTION:**

The United States Animal Health Association urges the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services, National Animal Health Monitoring System to coordinate activities with industry organizations, producers, National Agricultural Statistics Service and state animal health officials in the planning, development of key objectives, delivery, reporting and outreach for the 2012 national swine survey.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS), National Animal Health Monitoring System (NAHMS) appreciates the endorsement by the United States Animal Health Association (USAHA) for VS to conduct the fifth national swine study in 2012.

We have held our initial meeting with representatives from the National Pork Board and the American Association of Swine Veterinarians to discuss strategic plans for the NAHMS Swine 2012 study.

Throughout the year, NAHMS will assess the needs of the pork industry by gathering input from producers, producer groups, animal health officials, researchers, and others. We will take advantage of existing meetings to conduct focus groups with stakeholders and make use of electronic surveys to prioritize issues. Results of the needs assessment phase ultimately guide the focus of survey questions and biologic sampling and should be an accurate representation of the input garnered from the stakeholders listed in the USAHA resolution. By September 2011, we will have developed the key objectives for the NAHMS Swine 2012 study.

**FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS National Animal Health Monitoring System (NAHMS) appreciates the endorsement by the USAHA for VS to conduct the fifth national swine study in 2012.

VS held several meetings with representatives from the National Pork Board, the National Pork Producers Council, and the American Association of Swine Veterinarians to discuss strategic plans for the NAHMS Swine 2012 study. NAHMS has assessed the needs of the pork industry by gathering input from producers, producer groups, veterinary practitioners, animal health officials, researchers, and other entities. Additionally, VS conducted focus groups with stakeholders at various meetings and conferences and used electronic surveys to help prioritize issues. Results of the needs assessment phase ultimately guide the focus of survey questions and biologic sampling. The data should be an accurate representation of the input provided by the stakeholders listed in the USAHA resolution. The key objectives for the NAHMS Swine 2012 study have been released. Work has begun on the design of the study and will continue through 2011 with review and input from industry stakeholders.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER:** 42 APPROVED

**SOURCE:** COMMITTEE ON TRANSMISSIBLE DISEASES OF POULTRY AND OTHER AVIAN SPECIES

**SUBJECT MATTER:** SECURE EGG SUPPLY PLAN FOR WHOLE SHELL EGGS, EGG PRODUCTS, AND DAY-OLD CHICKS WITHIN, OUT OF, AND INTO HIGHLY PATHOGENIC AVIAN INFLUENZA DISEASE CONTROL AREAS

#### **BACKGROUND INFORMATION:**

In the event of a highly pathogenic avian influenza (HPAI) outbreak, ensuring market continuity for the egg producing sector is a significant challenge. Through continuity of business planning prior to an HPAI outbreak, the standards outlined in the August 2010 draft of Foreign Animal Disease Preparedness and Response Plan, Highly Pathogenic Avian Influenza Secure Egg Supply Plan, hereinafter referred to as the Secure Egg Supply Plan, promote food security and animal health. Developed collaboratively by a multi-disciplinary group of industry, public, and academic partners, the Secure Egg Supply Plan provides clear recommendations for emergency response leaders to facilitate the movement of whole shell eggs and egg products.

Egg production facilities often do not have the capacity to store whole shell eggs or egg products for prolonged periods of time. Therefore, a brief interruption in movement may result in serious shortages of eggs. The Secure Egg Supply Plan provides a transparent process for the movement of whole shell eggs and egg products during an HPAI outbreak, benefiting consumers, producers, and regulators. The science- and risk-based recommendations provided in this plan provide a high degree of confidence that the health of uninfected flocks will not be endangered by the movement of whole shell eggs and egg products and that HPAI virus will not exist in whole shell eggs or egg products destined for human consumption.

The Secure Egg Supply Plan provides guidelines and requirements that have been developed and agreed upon by egg producers, processors, poultry disease experts, and public health experts, as well as federal and state officials. The plan consists of three components: 1) Overview of the Secure Egg Supply Plan, 2) the Egg Movement Control (EMC) Plan, and 3) the Federal and State Transport (FAST) Eggs Plan.

The egg industry, state egg associations, United Egg Producers, state veterinarians, academia, and other regulatory individuals have reviewed and support the Secure Egg Supply Plan.

The Secure Egg Supply Plan from the Egg Industry is attached for reference.

#### **RESOLUTION:**

The United States Animal Health Association commends the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services for endorsing the Secure Egg Supply Plan as part of Foreign Animal Disease preparedness and response planning, and requests all states and tribal agencies incorporate the Secure Egg Supply Plan into their highly pathogenic avian influenza response plans.

**RESPONSES:**

Favorable State responses received from:

Georgia

Hawaii

Maryland

Massachusetts

New York

South Dakota

Tennessee

Washington

West Virginia





## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

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**RESOLUTION NUMBER: 44 APPROVED**

**SOURCE:** COMMITTEE ON TRANSMISSIBLE DISEASES OF POULTRY AND OTHER AVIAN SPECIES

**SUBJECT MATTER:** URBAN CHICKENS/POULTRY-NEED FOR TARGETED EDUCATION AND FUNDING FOR PEOPLE IN METROPOLITAN AREAS RAISING POULTRY

#### **BACKGROUND INFORMATION:**

There exists a current trend in many large and mid-sized cities across the United States for people to raise poultry, primarily chickens, for the purpose of food (meat and/or eggs) and companionship. Many of the people undertaking this effort are not versed in the husbandry and disease control programs for poultry.

Changes in zoning ordinances are occurring in many cities which allow small flocks to be raised in urban areas. There is a need to educate "urban poultry" raisers, who typically do not come from an agricultural background, on poultry disease control, zoonotic disease, and food borne disease.

The United States has experienced significant disease problems affecting the health of the national flock as well as the economic health of the country related to export and domestic sales. The most notable of these problems have been outbreaks of Exotic Newcastle disease and repeated occurrences of avian influenza in different areas of the country.

There is a continued need for funding to expand currently existing federal and state educational campaigns and disease monitoring programs targeted at these poultry populations.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), expand the existing educational materials produced by the Biosecurity for the Birds (Healthy Birds) campaign to include specific materials for urban poultry owners. In addition, the USAHA urges the USDA-APHIS-VS to maintain adequate funding for the Biosecurity for the Birds (Healthy Birds) campaign and maintain funding to states to fully support the national notifiable avian influenza (NAI) domestic poultry programs. Further, the USAHA urges Congress to continue to appropriate funds to USDA-APHIS-VS for the Biosecurity for the Birds (Healthy Birds) campaign and notifiable avian influenza programs.

#### **INTERIM RESPONSE:**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS), Veterinary Services recognizes the concerns of the United States Animal Health Association regarding the need for targeted education for people who raise poultry in metropolitan areas. APHIS continues to maintain the Biosecurity for the Birds campaign, as it is regarded as a highly successful outreach campaign both by States and industry. Additionally, the Live Bird Market Technical Working Group recommended at its February 2011 meeting that APHIS continue to support the Biosecurity for the Birds campaign.

The campaign already includes creative ways to reach its target audience, including urban poultry owners. For example, it works with hatcheries and feed distributors to place messages on their product packaging (chicks and chicken feed). One of the most recognized and widely used publications is the annual biosecurity calendar. The campaign has begun Bird Health Awareness Week (the first week in November) as an additional way to focus attention on biosecurity and disease awareness. In addition, more than 350 people participated in an educational webinar held in November 2010; many of them were urban poultry owners.

VS recently completed a study on poultry ownership in four metropolitan areas: Denver, Colorado; Los Angeles, California; Miami, Florida; and New York City, New York. The study, which will be released this spring, provides valuable information about urban poultry owners that will further help the Biosecurity for the Birds campaign target this audience.

Regarding funding, the President's fiscal year 2012 budget requested \$43.6 million for the avian health line item. This request is intended to support our avian influenza domestic poultry programs as well as the Biosecurity for the Birds campaign.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) recognizes the concerns of the United States Animal Health Association (USAHA) and appreciates the opportunity to respond.

USDA APHIS VS acknowledges the concerns of the USAHA regarding the need for targeted education for people who raise poultry in metropolitan areas. APHIS continues to maintain the Biosecurity for Birds campaign, as it is regarded as a highly successful outreach campaign by both States and industry. Additionally, the Live Bird Marketing System Working Group recommended at its February 2011 meeting that APHIS continue to support the Biosecurity for Birds campaign.

The campaign already includes creative ways to reach its target audience, including urban poultry owners. For example, it works with hatcheries and feed distributors to place messages on their product packaging (chicks and chicken feed). One of the most recognized and widely used publications is the annual Biosecurity for Birds calendar. The campaign has begun Bird Health Awareness Week (the first week in November) as an additional way to focus attention on biosecurity and disease awareness. In addition, more than 350 people participated in an educational webinar held in November 2010; including many urban poultry owners.

VS recently completed a study on poultry ownership in four metropolitan areas: Denver, Colorado; Los Angeles, California; Miami, Florida; and New York City, New York. This study is posted online at [www.aphis.usda.gov/animal\\_health/nahms/poultry/downloads/poultry10/Poultry10\\_is\\_Biosecurity.pdf](http://www.aphis.usda.gov/animal_health/nahms/poultry/downloads/poultry10/Poultry10_is_Biosecurity.pdf). The study provides valuable information about urban poultry owners that will further help the Biosecurity for Birds campaign target this audience.

The President's fiscal year 2012 budget requested \$43.6 million for the avian health line item. This request is intended to support our avian influenza domestic poultry programs as well as the Biosecurity for Birds Campaign. As the audience for this information continues to grow, APHIS will continue to request sufficient funds to maintain and support the Healthy Birds campaign.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER: 45      APPROVED**

**SOURCE:**                      COMMITTEE ON TRANSMISSIBLE DISEASES OF POULTRY  
AND OTHER AVIAN SPECIES

**SUBJECT MATTER**              INVOLVEMENT OF VETERINARIANS IN THE  
IMPLEMENTATION OF THE FOOD AND DRUG  
ADMINISTRATION SALMONELLA ENTERITIDIS RULE

### **BACKGROUND INFORMATION**

The United States Department of Health and Human Services, Food and Drug Administration (FDA) rule (Egg Safety Rule of 2009) addressing *Salmonella enteritidis* (SE) in the shell egg industry went into effect on July 9, 2010. The United States Animal Health Association is concerned that the Rule is being implemented with little involvement from veterinarians, who have received specialized education and training in control of infectious poultry diseases.

SE is a disease of significant concern to the commercial layer industry due to its potential to cause food borne disease in the human population. The shell egg industry continually works toward control of this disease through participation in National Poultry Improvement Plan *Salmonella* Monitoring programs and compliance with the Egg Safety Rule. Involvement of subject matter expert veterinarians in the implementation of this rule would allow for harmonization of existing SE programs in both breeding and production poultry and would ultimately benefit the FDA and the shell egg industry as they work together to reach the common goal of SE reduction in commercial poultry flocks.

### **RESOLUTION**

The United States Animal Health Association (USAHA) requests that the United States Department of Health and Human Services, Food and Drug Administration (FDA) involve the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services, National Poultry Improvement Plan Official State Agencies, state animal health authorities, and commercial poultry industry veterinarians in the implementation of the Egg Safety Rule of 2009. Further, USAHA encourages the FDA to include veterinarians and poultry subject matter experts in overall implementation of the Rule, and in assisting FDA in recognizing acceptable production standards, guidance documents, and compliance audit criteria specific to *Salmonella enteritidis* control for various housing types and systems.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER:**     **47   APPROVED**

**SOURCE:**                     COMMITTEE ON PUBLIC HEALTH AND RABIES

**SUBJECT MATTER:**           SUPPORT OF INCREASED FY2012 FUNDING FOR THE  
UNITED STATES DEPARTMENT OF AGRICULTURE, ANIMAL  
AND PLANT HEALTH INSPECTION SERVICE, WILDLIFE  
SERVICES ORAL RABIES VACCINATION PROGRAM

#### **BACKGROUND INFORMATION:**

Wildlife rabies is a serious public health concern. According to the 2009 Centers for Disease Control and Prevention (CDC) Rabies Surveillance Report, wildlife rabies is responsible for 92 percent of all reported rabies cases in the United States (Blanton, et al. JAVMA, 2010). The use of licensed oral rabies vaccine in oral rabies vaccine (ORV) programs has been effective in controlling rabies in certain terrestrial wildlife reservoir species since the early 1990's.

The United States Department of Agriculture, Animal and Plant Health Inspection Service, Wildlife Services (WS) ORV program is designed to reduce transmission of wildlife rabies to domestic pets, livestock and humans. It is estimated that there are over 40,000 administrations of Post Exposure Prophylaxis (PEP) against rabies in humans in the United States annually at an average cost of \$4,042 per treatment (Meltzer, et al. Vaccine, 2008) resulting in over \$160,000,000 per year in associated human health care costs. These costs do not include indirect impacts on the population from anxiety, fear, and trauma associated with rabies threats to people, their pets and livestock. In spite of a public health strategy that is effective in preventing human rabies deaths in the United States, the financial cost of coexistence with wildlife rabies is high, exceeding \$300,000,000 annually (Slate, et al. Proceedings 20<sup>th</sup> Vertebrate Pest Conference, 2002).

ORV campaigns in conjunction with other rabies control measures are effective. Regular distribution of oral rabies vaccines to immunize specific wildlife species increases the percentage of rabies immune animals living within the ORV baiting zones. Creating a sustained reservoir population of individual immune animals results in an overall decrease of wildlife rabies cases.

The level of the ORV program's success in the United States can be quantified as follows: transmission of the canine strain of rabies in south Texas coyote populations has been eliminated; the westward expansion of raccoon rabies strain has been halted at the Appalachian Mountains; the gray fox strain of rabies has been confined in the Southwest and the epizootic area is being consolidated and reduced; and, strategies have been developed to address wildlife rabies outbreaks in urban environments, especially in the Northeastern United States. Today, federal and state sponsored ORV programs, supported by the CDC, continue to monitor areas cleared of wildlife rabies while addressing new challenges. Due to the level of success achieved to date, the federal government has signed a North American agreement with Navajo Nation, Canada and Mexico called the North American Rabies Plan. A critical component of this plan is to control wildlife rabies.

Because of the economic downturn in the United States economy, all ORV programs (state and federal) are now faced with rapidly declining levels of governmental funding and resources while public support remains high. Ironically, as funding levels for United States ORV programs decline, societal changes have led to increasing numbers of interactions between humans and wild animals in urban habitats. Today and in the future, wildlife rabies prevention is, and will continue to be, a key factor in maintaining the integrity of rabies control in the United States. Funding at this level will have the additional benefit of job maintenance and creation, especially in rural locales. The ORV Program also supports alleviation of additional health care costs and disparities between rural, suburban and urban communities.

**RESOLUTION:**

The United States Animal Health Association requests that the 112<sup>th</sup> Congress appropriate funding of at least \$28 million in the fiscal year 2012 budget for the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service, Wildlife Services oral rabies vaccine program, a long standing and successful One Health project. This funding level would allow the USDA to be less dependent on emergency funding, to maintain ongoing logistical support, to provide rabies case surveillance necessary for the program, and to maintain adequate levels of rabies immunity in target wildlife populations.

**RESPONSE:****USDA, APHIS, WS**

USDA, APHIS, WS recognizes among its many priorities the need for new or improved oral rabies vaccines and baits to more aggressively achieve rabies management goals. WS and cooperators have initiated preparatory steps to facilitate field trials with prospective vaccine-bait candidates. The expectation is that new vaccine-baits would enhance program progress toward rabies management goals based on results of field vaccine comparisons between Raboral V-RG (Merial, Athens, GA) used in the U.S. and ONRAB (Artemis Industries, Guelph, ON, CA), a human adenovirus-rabies recombinant vaccine.



## UNITED STATES ANIMAL HEALTH ASSOCIATION

### Resolution

114th Annual Meeting ~ November 11-17, 2010

Minneapolis, MN

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**RESOLUTION NUMBER:** 48 APPROVED

**SOURCE:** COMMITTEE ON SHEEP AND GOATS

**SUBJECT MATTER:** NEED FOR APPROVED RADIO-FREQUENCY IDENTIFICATION IMPLANT SITE FOR GOATS AND SHEEP

#### **BACKGROUND INFORMATION:**

Currently there is no United States Department of Agriculture, Food Safety Inspection Service, feasible, approved site for radio-frequency identification (RFID) implants in goats and only one approved implant site for sheep. Goats are inquisitive animals and often chew or tear identification tags from the ears of other animals; ear tags may be lost from sheep and goats from field fencing, feed bunks, etc. LaMancha goats have very small external ears and neither ear implants nor ear tags are suitable for identification, leaving tail tattoos as the only identification option for producers. Torn ears from accidental tag removal and damage from ear tag infection raise owner concerns about animal welfare.

Permanent identification is required for regulatory programs and breed registration. Many goat owners wish to use electronic implants to take advantage of advancing technology. However, producers who wish to use RFID implants currently have no feasible approved option for goats and only a single option for implant site for sheep.

#### **RESOLUTION:**

The United States Animal Health Association (USAHA) requests that United States Department of Agriculture (USDA), Food Safety Inspection Service and United States Department of Health and Human Services, Food and Drug Administration work with USDA, Animal and Plant Health Inspection Service, Veterinary Services, Scrapie Program staff, American Dairy Goat Association, American Goat Federation and other representatives of the goat and sheep industries to identify and approve appropriate sites for radio-frequency identification implants for goats and sheep.

#### **RESPONSE:**

##### **American Dairy Goat Association**

An ADGA task force has been appointed to consider this matter and we will contact you soon with a response.

##### **USDA FSIS**

FSIS is the public health regulatory agency in USDA responsible for ensuring that meat, poultry, and processed egg products are safe, wholesome, and accurately labeled. FSIS enforces the Federal Meat Inspection Act, the Poultry Products Inspection Act, and the Egg Products

Inspection Act, which require Federal inspection and regulation of meat, poultry, and processed egg products prepared for distribution in commerce for use as human food.

I am pleased to have the opportunity to provide you with information regarding our current and planned involvement with this project. Dr. William Shaw, Division Director, and Dr. Bharat Patel of FSIS Risk, Innovations, and Management Division, Office of Policy and Program Development, will be the Project Managers working on this project. They will be contacting the United States Animal Health Association regarding RFID implant sites for goats and sheep.

#### **INTERIM RESPONSE**

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services (VS) appreciates the concerns of the United States Animal Health Association (USAHA) regarding appropriate ways to identify goats and sheep. VS supports USAHA's request that the Food and Drug Administration (FDA) and the Food Safety Inspection Service (FSIS) investigate appropriate sites for radio frequency identification (RFID) implants for sheep and goats in the United States. VS will help industry, the FDA, and FSIS address the primary issues that include tissue adulterants, implant sites, and the official numbering system assigned to RFIDs in sheep and goats.

#### **American Goat Federation (AGF)**

In our recent Board meeting we approved your request for our input on this resolution and would greatly appreciate the opportunity to provide input on other issues related to goats as well. We look forward to working with you on this issue and will provide timely input as requested. We interpret your resolution that you will request our input in a future meeting or other organized way at some point in the future. We look forward to working with you on this project.

#### **FINAL RESPONSE:**

The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS) appreciates the concerns of the United States Animal Health Association (USAHA) about appropriate ways to identify goats and sheep.

VS supports USAHA's request that the Food Safety and Inspection Service (FSIS) investigate appropriate sites for radio frequency identification (RFID) implants for sheep and goats in the United States, and we have contacted FSIS to offer our assistance. VS has approved one RFID implant device (approved by Food and Drug Administration) for use as official ID in the National Scrapie Eradication Program (NSEP) when applied at the sites currently approved by FSIS.

Other requirements for the use of RFID implants in the NSEP are available online at [www.eradicatescrapie.org/Educational%20Resources/PDFs%20&%20PPTs/Goat%20ID%20Microchip%20Addendum.pdf](http://www.eradicatescrapie.org/Educational%20Resources/PDFs%20&%20PPTs/Goat%20ID%20Microchip%20Addendum.pdf).