RESOLUTION NUMBER:  14  APPROVED

SOURCE:    COMMITTEE ON INFECTIOUS DISEASE OF HORSES

SUBJECT MATTER: Enhancements to States’ Contagious Equine Metritis Post-Entry Quarantine and Testing Programs

BACKGROUND INFORMATION:

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Veterinary Services (VS), initiated a review of the United States’ Contagious Equine Metritis (CEM) import program in 2007. Included in the Program Review Team’s report to USDA were comments describing deficiencies in regulatory oversight and accountability of programs in states approved by USDA allowing importation, quarantine and testing of equids originating from countries categorized by USDA as CEM affected. Furthermore, the reviewer’s did include specific and detailed recommendations that would correct identified deficiencies with regulatory program oversight and other areas.

The 2009 CEM incident in the United States involving 48 States and 991 exposed equids initiated “The First Conference of Experts on CEM” at the United States Animal Health Association (USAHA) meeting in San Diego in 2009. The conference experts concluded that inadequate regulatory oversight of a CEM facility was likely a factor contributing to the outbreak. During this same USAHA conference the Committee on Infectious Diseases of Horses adopted language in a resolution urging that the recommendations included in the program review be implemented. The February 2013 VS Guidance Document 13406.1 with the incorporated Code of Federal Regulations provides standards which each state approved to import horses for CEM Quarantine must adhere as well as setting the minimal facility quarantine, testing, and treatment requirements.

To date, the method USDA utilizes to assess the infrastructure and applicability of each approved state’s individual programs when importing horses from CEM affected countries remains unclear. The review team’s report recommended the USDA Program Coordinator devise a system of auditing states approved to conduct CEM quarantines. To date, no auditing system to insure State programs are operating in accordance with and fully meeting the defined standard has been implemented. To avoid additional failures in the program that put our domestic populations at increased risk of disease, a credible and measurable means of auditing approved States to insure all facilities within that State meet the established quarantine and program testing standards of each CEM Quarantine Facility is necessary and should be evaluated annually. A component included in the evaluation should be defining the routine regulatory oversight instituted and practiced in each approved State.

The success or failure of this CEM import program is solely dependent on proper implementation of the prescribed quarantine, animal management and testing procedures. Proper implementation is achievable only if knowledgeable, technically trained and qualified individuals provide day-to-day regulatory program oversight.

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) to:

1. Define specific benchmarks for annual evaluation of each approved state’s Contagious Equine Metritis (CEM) Import Quarantine Program. USAHA requests USDA-APHIS-VS develop a standard Annual CEM Import Quarantine State Report Form and Annual Facility Inspection Report Form. The Annual State Report includes an assessment of the state’s infrastructure for CEM oversight and the standard operating procedures utilized by CEM import quarantine facilities. The individual facility inspection report should, at a minimum, include evaluation of housing, horse handling, equine care practices, movement within the facility, record keeping, biosecurity practices of facility employees and
veterinarians, and knowledge and training related to reproductive anatomy, sample collection, or handling protocols.

2. Develop protocols for suspending or revoking state approval or individual facility approval when there is a failure to meet the established program standards.

3. Require approved states to have trained qualified personnel, who have completed the USDA’s CEM training course to manage the state’s CEM Program.

4. Work with CEM state coordinators to review and modify the CEM quarantine facilities’ data reporting protocols and to develop a searchable data repository which can produce industry requested summary reports.

5. Provide an annual report of the CEM Import Program to the state animal health officials and equine stakeholders.

INTERIM RESPONSE:

In order from the resolution:

1. The contagious equine metritis (CEM) import testing program is a joint State-Federal program. APHIS develops regulations and program standards. Facility standards are described in VS Guidance 13406.1, “CEM Testing for Imported Horses at Approved Quarantine Facilities.” The primary responsibility for oversight and facility inspection lies with participating State animal health officials. State officials are responsible for approval of individual CEM import quarantine facilities and have the ability to revoke approval of non-conforming facilities.

Criteria for approval of a State to conduct CEM import testing are found in 9 CFR 93.301 (h), and give wide latitude for States to operate as they see fit. Requiring an annual facility inspection report is an individual state decision. More specific Federal oversight criteria would require changing the existing CEM regulation. APHIS will obtain input from stakeholders to determine if rulemaking is needed to require more stringent federal oversight over CEM import quarantine facilities through industry meetings, regularly scheduled industry conference calls, and national assembly calls.

2. Requirements for State approval are described in 9 CFR 93.301 (h). APHIS does not approve individual facilities. Facilities are approved by the participating State. Guidelines for facility approval are described in VS Guidance 13406.1, CEM Testing for Imported Horses at Approved Facilities. Responsibility for ensuring compliance lies with the State.

Approval of a State can be revoked if a State does not comply with Federal regulations as described in 9 CFR 93.301 (h) (5), which allows the Administrator to revoke approval of a State upon determinations that any requirements of the CEM regulations are not being met.

3. At this time, there is a regulatory requirement for training of laboratory personnel only. Because this is a joint State-Federal program, at this time it is the responsibility of the State to ensure that personnel working in or overseeing state facilities have appropriate training. While APHIS cannot require training of personnel working in or overseeing test facilities, such training has been provided in the past. In addition, a training course is planned for July 2015.

4. APHIS will work with State CEM coordinators to achieve this.

5. APHIS will provide a summary report at the United States Animal Health Association Infectious Diseases of Horses Committee meeting.