ADVANCING ANIMAL DISEASE TRACEABILITY ROAD MAP FOR THE STATE OF RHODE ISLAND

A Three-Year Plan

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I. EXECUTIVE SUMMARY

A simple, comprehensive, and easy to comply with Animal Disease Traceability (ADT) plan is a necessity to protect animal agriculture in the state and in the United States. There is little if any debate on this point. However, there is much debate over how to achieve the goal of having an effective ADT plan. Most of the debate is focused on having an effective plan, but not at the expense of sacrificing privacy, interstate commerce, or small independent business. This road map will attempt to outline a state ADT plan that will be effective and at the same time, expected to enjoy compliance from producers.

The benefits of having an effective ADT plan will be to have the ability to rapidly trace the movement of diseased animals in an effort to mitigate the animal health risk, public health risk, and risk to interstate and international trade that diseased animals represent. Having such capabilities will facilitate epidemiological investigations, identify exposed or at-risk animals and premises, and will allow rapid containment and control actions to take place. Having this ability will demonstrate to animal industry, to consumers of animal products, and to domestic and international trade partners that our animal products are safe, that regulators have the ability to quash any outbreaks, and, that we are committed to making our animal products as safe and marketable as possible.

NOTE: The term "animal" as used in this document refers to cattle, sheep, goats, horses, swine, and poultry.

The cornerstone of any ADT plan is official identification (ID) and knowledge of animal locations. Once animals are officially identified, then it is more-or-less a matter of recording such ID and recording animal movement. Historically, state and federal animal health agencies had ample opportunity to apply ID to animals when there were robust disease eradication programs, such as cattle brucellosis testing and vaccination, cattle tuberculosis eradication, and swine pseudorabies eradication. These programs required animals to be identified and records of animal locations be recorded. Granted, these programs were very expensive to administer, but they provided opportunity for animal identification and animal location identification. Therefore, they provided the foundation for an ADT plan. Historically, searching for individual animals within these records was a very arduous task. As these programs enjoyed successful outcomes (i.e. eradicated or greatly reduced the incidence of the diseases they intended to) it became evident that funding them was no longer cost effective. As regulations regarding testing and/or vaccination eased, so too did we begin to lose our ability to trace animals.

Currently, we are faced with development of a plan that allows for the animal ID and animal location components that we enjoyed under disease eradication/vaccination programs, without the expense of administering those programs. We must also have a means of quickly searching ID records. It must be acknowledged that the highway and rail infrastructure that exists nowadays did not exist at the inception of many of

the "classic" disease eradication programs with the result being that animal movement occurs much faster and much more easily than it did when those programs began. Therefore, it is imperative that we develop means of searching/tracing movements of animals that keep up with the current speed of animal commerce.

- The fundamental problems to be addressed by this plan are:
    - Increasing the application of Official ID to animals, including increased application of RFID tags.
    - Enhancing our knowledge of where animals are located.
    - Enhancing our ability to trace animal movement on or off premises.
    - Continuing the transition from a mostly paper based ICVI system to a system that uses electronic ICVIs.
- The key elements of this plan will be:
    - Ongoing location of animal premises through GIS systems.
    - Ongoing distribution of official ID tags to producers.
    - Ongoing educational outreach to producers regarding the benefits of an ADT system to protect their animals and their livelihood.
    - Educational outreach to federally accredited veterinarians regarding the importance of an ADT system and their role in protection of their clients, and their client's livelihood. This will include them phasing out use of NUES tags in accordance with USDA's timeline, promoting use of and using RFID tags, and phasing out use of paper ICVIs with replacement by electronic ICVIs.
    - Use of a data management "system" whereby data is rapidly searchable and is as real-time as possible. The primary system is Core One but until all records are electronic, we will still need to maintain a paper-based record system. Until all records are electronic, we will require personnel to record and enter data regarding ID application to animals and interstate movement of animals. Searchable electronic tools will be used to facilitate this if those tools are realistically available.
- The benefits of this work will be to have the capability to trace diseased animals into or out of the state. It will allow RI to cooperate efficiently in incidents involving interstate movement of animals. It will allow RI animal health officials to locate and take appropriate timely actions when a diseased animal has been reported to have entered the state or has otherwise been discovered.
- Currently, RI's ability to trace animals is adequate since we have made Official ID tags available directly to producers. These producers are then able to apply the ID themselves and record the application. As NUES tags are phased out we have supported producers who wish to purchase official RFID tags by providing them the necessary LIDs. We also have made available free of charge to producers a portion of USDA's allotment of RFID tags. Sheep and goat producers continue to be able to obtain Official ID (scrapie tags) directly

from USDA for identification of those species, however funding to support free tags to sheep and goat producers has ceased. There is ongoing outreach to producers about the benefits of a sound traceability system, and the trend is that more producers are complying with ID requirements. Additionally, the State Veterinarian, as time allows, will provide the service of examining animals for interstate shipment and preparing an Official Certificate of Veterinary Inspection (OVCI) for those animals. OCVIs prepared by the State Veterinarian utilize the electronic CVIs through Global Vet Link (GVL). The GVL application has been approved for both small and large animal OCVIs in RI.

- The final ADT rule has been promulgated by the USDA and this plan is compliant with that rule in that animals involved in interstate commerce will be officially identified and all interstate animal movements will be recorded. In fact, this plan exceeds the standards in the ADT framework because there will not be age exemptions for cattle. RI has promoted the phase out plan for NUES tags and the plan for replacement by RFID tags.
- It is expected that this plan will fully support efforts taken in other states, territories, tribes, and federal plans.
- This plan is expected to receive more support from producers as NUES tags are phased out and replaced by RFID. Both accredited veterinarians and producers will also support the transition to electronic ICVIs.
- Expected project costs are $55,500 per year through 2026.

II. CURRENT TRACEABILITY SITUATION

2.1 The RI Department of Environmental Management/Division of Agriculture & Forestry/Animal Health Unit will be primarily responsible for administration of this plan. The entire staff of the Animal Health Unit consists of two full-time field personnel and one full-time veterinarian who is primarily relegated to support from the office. In addition to ADT, Animal Health has many other tasks related to animal health including but by no means limited to animal welfare, licensing of facilities, disaster preparedness, public health, strategic planning, inspections, and investigations. Given current staffing levels and the unlikelihood of having the ability to increase Animal Health staff, the only realistic means of implementing an effective and compliant ADT strategy will be to request cooperative agreement money to hire a contractor to assist with entry of data. Currently, our existing cooperative agreement has allowed us to partner with the RI State Conservation Committee (RISCC) to handle the work that having an effective ADT plan requires. These partnerships will be necessary until the fiscal situation that the state is currently enduring is resolved. It should be noted that transitioning from a paper-based system into an entirely electronic system will take time. During that transition, both systems will require support. Therefore, it is a reasonable expectation that costs of this program will necessarily increase until the transition is

complete; then costs will decrease as personnel for data entry are no longer required.

- The primary constituents are the RIDEM/Division of Agriculture & Forestry/Animal Health Unit in regard to oversight, administration, and development of the plan. The RISCC will provide human resources through a contractual agreement to distribute ID information to producers, to distribute official ID tags to producers, and to educate them regarding the benefit of ADT. They will also provide human resources for data entry regarding ID application, animal location, ID distribution, and animal movement through OCVI.
- RIDEM/Division of Agriculture & Forestry/Animal Health Unit is the primary constituent, and the RISCC is an external constituent under contract.
- Traceability data will be used internally to enhance disease/disaster response preparedness by having a better idea on the number and location of animals within the state. Externally, data will be shared, as necessary, with USDA and/or other states that would have an epidemiological link to animals in RI.
- RI values having an ADT system that is interoperable with all other state/tribal/territory systems and that is effective, efficient, and capable of enhancing the overall traceability capacity of the country. Our current system is a combination of paper-based and electronic data, but our goal would be the eventual phase-out of all paper-based systems.

2.2 The current status of ADT in RI is as follows:

- Animal Disease Traceability capacity currently is limited by the rate of compliance with state and federal regulations. Current state importation regulations require all individual cattle, sheep, goats, and horses to be identified and listed individually on an OCVI; animals being imported into RI must be identified and accompanied by an OCVI unless slaughtered within 72 hours. Those that are destined to slaughter within 72 hours are still required to be identified, but they may move into the state on an Owner Shipper Statement. Animals being exported from RI need to meet requirements of state of destination, therefore RI has no requirement for an OCVI or animal ID above what the state of destination has.
- Currently, ADT can be accomplished for animals that have been legally imported into the state and for those that have been exported and for which the state of destination required an OCVI or other movement document, and animal ID. The speed at which this occurs is dependent on several factors including whether the Division of Agriculture has a paper or electronic copy of the OCVI with RI as the origin or destination state, whether our copy has been uploaded into Core-one yet, or whether we need to search paper copies.

Limitations on this are obviously the speed in which we are able to gain access to an OCVI. If an issuing veterinarian fails to send copies of an OCVI to the proper authorities in a timely manner, then there is no way to trace that movement. Likewise, if an animal owner moves animals without an OCVI there will be no record of the movement. So, once we have an OCVI by any form, we can search our data, in any form, with the expectation that the location of the animal will occur within a matter of a day's time at worst.

- Once the RI State Veterinarian is notified that an animal is being searched for, staff will be assigned to this task as a high priority. Electronic and paper records will be reviewed to locate the animal, and once located, the farm owner will be contacted to notify him/her that the animal is being traced, the reason, and what if any disease containment actions are to be taken place. Being a small state, coordination across the state is relatively easy.
- The RI State Veterinarian will coordinate trace efforts with USDA and any epidemiologically linked states via telephone, email, etc.
- It is currently assumed that the RI Division of Agriculture & Forestry can locate any animal in question to a premises within a matter of hours to one day. The limiting factor is the quality of the information on the OCVI and the speed in which we get that information. As electronic OCVIs are beginning to overtake the number of paper-based documents, the time to locate an animal has been dramatically decreased with most test traces taking less than an hour.
- Currently, we are managing data captured on OCVIs on the Core-one application. Paper or electronic forms are the source of the data, and the data are then entered electronically into this tool. Once in the Core-one tool, data can be searched easily. Paper records can also be searched, but it is more labor intensive. Even though more work, paper records in RI can be adequately searched manually due to the low volume of animal movement into and out of RI. With increased use of electronic CVIs that meet the data standards of USAHA, these products are searchable electronically. They also interface well with Core-one and data migration is facilitated through the free instance of Statevet.com that was developed. GVL is in wide use in the state for livestock so there is already a significant use of electronic CVIs.
- The RI State Veterinarian is available for emergency response 24/7. The USDA AVIC and all state veterinarians have emergency contact information and can use it at any time.
- Due to the federal mandate to have a compliant ADT plan and capabilities, RI must be able to meet program standards (once developed). Unfortunately, RI is in a static fiscal situation. State agency budgets are essentially unchanged year-to-year, state

workforces are currently level, and this trend is likely to continue. Therefore, at least in the foreseeable future, federal funding of state efforts to enhance ADT capability will be necessary for RI.

2.3 Strengths and Weaknesses

- The strength of RI's current and future ADT capabilities lies in the fact that RI is a small state and animal agriculture is a relatively small sector of the state's economy. Therefore, many of the animal producers are known within the state. Knowing farm locations gives the state the ability to target ADT outreach to the actual premises where animals were known to exist. More importantly, this data is essential for any ADT response. As the RISCC contractors perform data entry into Core-one they confirm whether or not a premises has an associated PIN or LID. If there is no location identifier associated with a premises they will generate a LID. Therefore, over time, the number of premises with an associated PIN or LID will increase.
- Weaknesses are incomplete animal location data (this information is constantly in flux), a state fiscal situation that precludes hiring of personnel to implement the program, a reliance on federal funding that is uncertain at best, and a current lack of a data management tool that will serve as an ADT tool, but also will capture other animal health data that the state wants to keep.

2.4 Opportunities and Threats

The data used to locate animal premises have the opportunity to enhance disease and disaster preparedness and response capabilities in the state. Knowledge of animal locations can help in all-hazard disaster planning, and knowledge of the type and number of animals can also assist in modeling for disaster response and disease outbreak response. This plan would therefore provide an opportunity to enhance all hazards response far more than simply ADT capability would.

- This plan certainly would mitigate threats from multiple sources, not simply threats related to animal disease outbreaks.
- This crosscutting plan enhances networking opportunities and therefore eliminates much of the redundancy of having separate programs for individual disease response and interagency disaster response, therefore making the planning and response more efficient.
- Without implementation of this plan RI would not have the resources to adequately respond to the initial phases of a disease outbreak or other disaster involving animals where the location of animals is necessary for said response.
- Without implementation of this plan, affected areas will need to be canvassed to locate animals and animal farms. This will necessitate a huge response that is time sensitive. This plan will allow for capture of this data BEFORE an event, and the data can then be used

to respond. It front-loads obtaining the data to the time preceding an event so that limited resources can be more efficiently used in response post event.

- An ADT plan that supports identification of animal locations prior to an event facilitates interagency collaboration. This information will be used by multiple state agencies for all-hazards response.

2.5 Inventory of existing infrastructure and suitability assessment

Existing infrastructure includes support from Animal Health staff, office space availability, computer access availability, incomplete data of animal locations, existing regulations that require identification of all animals moved into RI and an OCVI requirement (unless moved directly to slaughter), and existing contracts with RISCC for outreach and data entry.

- Human resources consist of three full-time Animal Health staff. Human resources are augmented through contractual arrangements with RISCC to provide human resources for distribution of official ID information to producers, gathering records of ID application and distribution, providing those records to Animal Health, and development and administration of educational outreach to animal producers in reference to the benefits of ADT as well as necessity for compliance with ADT rules. RISCC also provides the human resources and workspace for data entry of OCVI and tag distribution data into Core-one.
- There is adequate office space within RIDEM for workspace and records storage to enact the plan as it currently exists.
- Currently there is adequate computer terminal access for data entry to take place here at RIDEM. There is connectivity between Animal Health and contractors through internet and via telephone. Also, there is electronic transfer of data in the form of OCVIs to Animal Health from other states. These OCVIs may be electronic forms, or scanned paper forms. Transfer of electronic data is done by email.
- RI currently has and is expected to have access to USDA traceability and animal health information. Usually, this access is done electronically.
- All paper records are held and reviewed on a weekly basis. Weekly basis for review was based on volume of OCVIs received here at the Division of Agriculture and could be done much more frequently if there was a known disease threat. The paper OCVIs are scanned and transmitted to the RISCC for data entry. Electronic OCVIs are forwarded to the RISCC directly as well as being printed and filed here at RIDEM. The paper copies are then filed by RI farm location where they are held in the office for at least 5 years, after which they are stored in a remote site.

III. VISION AND MISSION CONTEXT FOR ADVANCING TRACEABILITY

3.1 Vision Statement

The Department's vision for advancing ADT is to have in place a system whereby all stakeholders, governmental and non-governmental, realize the benefit of such a system in regard to protection of animal agriculture, animal health, public health, and marketing of animals and animal products domestically and abroad.

3.2 Mission Statement

It is therefore the mission of the Department to work collaboratively with all stakeholders to develop a system to enhance ADT so that animal agriculture, animal health, public health, and animal marketability is protected.

IV. TRACEABILITY REQUIREMENTS

4.1 Strategic goal(s)

The strategic goals of enhancing ADT are as follows:

- Develop an ADT plan that is consistent with national goals for ADT and is interoperable with the plans of other states/tribes/ territories.
- Develop an ADT plan that will yield cross cutting data that will be used for all hazards disaster response and will be used by multiple agencies.

4.2 Programmatic goals are as follows:

- Target, develop, and implement outreach messaging regarding data quality and processing for animal health information forms. This will primarily target accredited veterinarians and animal producers such that forms collect minimal data necessary to affect the plan. OCVI data will be the primary source from veterinarians but may include any testing for program diseases. In reference to animal producers, the main outreach will be to encourage them to apply ID to their animals and to provide accurate records of that application to the Division of Agriculture. This will be ongoing throughout the life of the plan.
- OCVI data uploads must occur in a timely manner. The three factors influencing this are 1) how promptly the issuing veterinarian who prepares the certificate forwards that certificate to the proper animal health authorities, 2) how promptly the animal health official forwards the certificate to RI for imported animals, and 3) how promptly the data on certificates that are here in RI are uploaded. Goal is to enhance/expedite all three if possible. Ultimately, there will be a mandatory transition from a paper-based system to an entirely electronic one. Applications that interface with Core-One make this transfer of data instantaneous. Encouraging increased usage of interoperable electronic systems will be ongoing throughout the life of the plan. DEM has ceased making paper certificates available to facilitate phase-out of their use.

- Due to the fact that the state will not likely be able to hire a person to take on the role of data entry and current staff will not be likely to assume this role on a daily basis, it will continue to be something that will be outsourced to contractors. The objective will be to have all data uploaded for routine work on a weekly basis and to task existing staff with doing so at any time on an emergency basis upon notification that there is an ongoing trace. Note that as electronic systems are implemented, there will be an ongoing need to support the existing paper-based systems of data entry while also supporting adoption of software that allows direct importation of OCVIs into Core-one. There is a trend toward increased use of electronic OCVIs by accredited veterinarians, but we still receive a significant number of paper-based OCVIs.
- Data retrieval will be enhanced by the state migrating data into Core-one. This tool, though not a traceability tool, has the capability of tracing animal movements and data storage consistent with the goals of this plan. Premises information gained through location of premises in GIS can be migrated into this program and animals identified can be associated with that premises. This will commence immediately.
- The RI State Veterinarian is available on emergency basis at any time to share necessary data with USDA or any state/tribal/territory authority that is authorized to request such data.
- Use of Core-One product will provide a means of associating surveillance data with individual animals or premises, further enhancing traceability and/or disease disaster response.
- Tag application and distribution enhancement will be accomplished by delivery of tags and applicators to producers at the time that contractors reach out to them. Additionally, the DEM has transferred a large proportion of RFID tags from our USDA allotment to the contractor so that the contractor can, in turn, provide those tags to producers who request them. The contractor keeps all distribution records and makes them available at the request of the state veterinarian. Contractor(s) will collect data that is in excess of ADT framework requirements in regard to the minimum amount of information for premises location, animal owner, and policies consistent with VS memo on distribution of NUES compliant tags. This is ongoing and will continue for the life of the plan.

4.3 Animal disease traceability performance measures (required)

ASSUMPTION: The following performance standard baselines are made working on the assumption that we are dealing with lawful shipments of animals AND that OCVIs have been promptly forwarded from accredited veterinarians to the state animal health officials and that those state animal health officials in the state of origin have promptly reviewed and forwarded their copies to the states of destination. Obviously, illegally transported

animals that arrive in a state will be more difficult to trace as will legally documented shipments for which documentation (review and forwarding of OCVIs) is delayed.

- Performance standard 1: Determines the State/Tribe in which the animal was officially identified and notifies the State/Tribe of the reference animal's official ID number. (To be performed by the animal health official in the receiving state or tribe)
    - If Rhode Island was the receiving state of a reference animal, and that animal was officially identified, it would take less than one day to determine which state applied official ID. The SAHO in the state of origin would be notified by common means of communication, including but not limited to telephone conversation, facsimile, email, text messaging, etc. OCVIs could be searched electronically or manually within that time period and once the animal location within the state has been determined, animal identification could easily be physically confirmed by an animal health technician or the State Veterinarian visiting that farm. The caveat being that access to the farm may be restricted if the farm owner is not present.
- Performance standard 2: Confirms that it has documentation that an official ID number has been issued within its jurisdiction and that it has contact information for the person who received that number. (To be performed by the animal health official in the state or tribe where application of official ID occurred.)
    - If Rhode Island is notified that official ID has been applied in RI to a reference animal, it is expected that RI animal health officials could confirm that application within one day provided that the Division of Agriculture has a record of that application. We could certainly search all records that we currently have in possession within that timeframe. DEM would not necessarily have a record of a tag being applied to an animal since the producer may apply the ID and there is no requirement for application records to be forwarded to DEM. That being stated, DEM would have records of distribution of tags to a producer so those records would be used to determine where the animal was tagged.
    - It is expected that RI animal health officials could verify that a reference animal was identified within the state within one to two days. The ID would have been applied in one of the following manners: 1) the ID was applied by an employee of the Division of Agriculture; 2) the ID was distributed directly to a producer and the producer applied the ID to one of his/her animals (in this case the Division of Agriculture has a tag distribution record); or 3) the ID was distributed to a federally accredited veterinarian, and that veterinarian applied the tag (in

this case the Division of Agriculture would have a tag distribution record to that veterinarian, but would need additional time to contact that veterinarian for records of which animal the tag was applied to). Tag distribution records would need to be manually and electronically searched for the series of tags distributed to a particular producer or accredited veterinarian because currently both paper and electronic distribution records are being used. In all likelihood 2 days is a very conservative estimate and it may very well be accomplished much sooner.

- Performance standard 3: Determines the State or Tribe from which the animal was moved interstate into its jurisdiction and notifies that State or Tribe of the reference animal's official ID number. (To be performed by the animal health official in the receiving state or tribe.)
    - This is somewhat dependent on the timeline in which RI animal health officials receive an OCVI from the state of origin. The fact is that it is possible for the animal to arrive in the state long before the RI Division of Agriculture receives an electronic or paper copy of an OCVI. Limiting factors in this are delays from accredited veterinarians in the state of origin forwarding copies to their state animal health officials, then further delays in review by the animal health officials in the state of origin and forwarding reviewed OCVIs to RI. These are all circumstances that are out of the control of the receiving state. Having stated that, once RI is in receipt of an OCVI referencing a particular animal, the state of origin can be notified within one day, likely less. This performance standard should be greatly improved with applications that instantaneously transfer data.
- Performance standard 4: Determines the address or location from which the reference animal was shipped. (To be performed by the animal health official in the state or tribe where the animal was shipped from.)
    - The time it would take to verify that a reference animal originated from RI would be less than one day provided that the Division of Agriculture was in possession of an OCVI bearing the animal's ID and origin. There is the potential for delay from the accredited veterinarian in RI submitting the OCVI in a timely fashion. The RI Division of Agriculture will monitor and encourage timely submission of OCVIs issued by federally accredited veterinarians.

4.4 Data requirements

- Currently, location identification numbers (LIDs) are being used. The reason that LIDS were chosen over PINS is that RI producers, for the most part, have preferred not sharing location identifiers with

the federal government. The use of LIDs does not preclude issuance of a PIN if a producer prefers sharing that information with the federal government, however since producer compliance with an ADT plan is necessary, current thinking is to not take any action to disenfranchise producers. For the producers that prefer PINs, the Division of Agriculture & Forestry refers those producers to USDA for allocation of a PIN. Use of LIDS provides the RI Division of Agriculture to assign a unique number to premises while being able to address producers' concerns over PINS.

- Official ID will be the only method of ID to be used. NUES tags will be phased out in favor of RFID and in accordance with USDA's timeline. RFID is gaining acceptance and Animal Health staff have facilitated producers purchase of them by assisting them with obtaining a LID so they can order tags from suppliers. "Scrapie" tags will continue to be used in sheep and goats for producers who wish to purchase them. An anticipated area of push back from producers will be use of breed registration numbers associated with tattoos as "official" ID. Currently, these tattoos are considered official ID within the state, but are not considered so under the ADT rule. RI will use official ID that is consistent with national program standards.
- Consistent with VS Memo 578.12, NUES tags will continue to be available for distribution directly to producers until they are phased out. Producers are recognizing the enhanced utility of RFID though and requests for NUES are waning. This is likely a function of RFID being a better alternative overall, and the fact that producers recognize that NUES tags are moving towards obsolescence. Availability of official ID tags has increased compliance with animal ID since producers have gotten in the habit of applying ID when it is convenient for them to do so and at times when they would normally be handling their cattle. The RI Division of Agriculture & Forestry will continue to assist producers as NUES tags are phased out in favor of RFID. The RI Division of Agriculture will also assist producers with any federal program that will assist producers use of this form of ID.
- A tag distribution system will be that the RI Division of Agriculture & Forestry will assist producers to acquire their own tags directly from distributors. We will provide or generate a LID for them so they can then order tags directly. We lack the resources to distribute tags to producers since our staff has been reduced from 4 FTEs to the current 3. Additionally, our contract partner, NRICD, will distribute official ID (RFID) tags to producers and keep distribution records. This stock of tags is a portion of the RI allotment from USDA and these tags are offered at no cost to the producers.

- OCVIs are the only forms approved for interstate animal movement unless directly to slaughter (within 72 hours at a USDA inspected plant).
- Data will be shared with USDA and other states/tribes/territories immediately upon a request by USDA or authorized animal health official in a state/tribe/territory. The RI State Veterinarian is available for emergency recall at any time and has prompt, if not immediate, access to computer records. Data will be shared by telephone communication or electronically by email. Any data that is not stored electronically will need to be manually searched, however this should not be a very time-consuming task due to the low volume of animals being moved into and out of Rhode Island, and the increasing trend of electronic documents has resulted in fewer paper documents.

4.5 Information technology plan

The IT needs of RI are relatively simple because of the small volume of animals shipped into and out of the state. It is expected that Core-One will be utilized by RI for the foreseeable future. Though this is not a "traceability" program, this program will sufficiently meet the needs of the state in regard to having adequate traceability capability. The transition from a mixed system of paper-based OCVIs to an entirely electronic OCVI system is progressing and is expected to continue along that trajectory. RI Division of Agriculture & Forestry receives all formats of OCVIs, whether paper or electronic. The plan is to support data entry of all current formats while transitioning over time to a completely electronic format. It is unlikely that the transition will occur over the life of this document, but it is expected that it will progress toward that goal. During this transition there will be costs associated with maintenance of both systems, however, as the paper-based system is phased out, the cost of support of that system will also be reduced and then eliminated.

4.6 Resource requirements

- A means of migrating existing farm location data into Core-one will be a great benefit. Currently, it is not known whether this can easily be done. Either Core-one resources or state resources will need to investigate this possibility.
- It is possible that consultants will need to be involved in this migration, however, if the proposition to rectify the two databases is too arduous, it can be managed as two separate entities.
- RIDEM has a Continuity of Operations Plan (COOP), the plan is updated fairly frequently, but unfortunately it is rarely tested.

4.7 Organizational Needs

4.7.1 Executive support

- The Chief of the RI Division of Agriculture & Forestry and the Director of the Department of Environmental

Management fully support an ADT plan that will protect RI livestock, will support interstate ADT efforts, is compliant with national ADT standards and will enhance marketability of RI livestock and poultry.

4.7.2 Coordination and oversight procedures

- The RI State Veterinarian engages RI livestock and poultry producers frequently. The RI State Veterinarian will continue to engage with these sectors to stress the importance of ADT efforts, and to listen to their concerns.
- Emergency response personnel are contracted from URI through an existing contractual agreement. Additional in state resources are personnel from the RI Department of Environmental Management, RI Emergency Management Agency, and possibly the RI Department of Health. The six New England states have also entered into a compact with each other to share resources for animal emergency response on a regional level.
- RI plans to have an ADT plan that is consistent with federal ADT rules, therefore, will be compliant with and interoperable with all other compliant state/tribe/territory plans.
- The State Veterinarian will be the administrator and will assign duties to Animal Health staff directly, or contractually to RISCC as external support for the plan.
- Feedback regarding implementation of the plan will be direct and linearly to the State Veterinarian.

4.7.3 Policy

- Existing animal importation regulations will need to be reviewed and amended as necessary to maintain consistency with a federal ADT rule and to ease interoperability with other state plans.

4.7.4 Staffing

- Currently, ADT is supported by federal cooperative agreement funds being used to hire contractors. ADT is also supported in-kind by animal health staff developing plans, assisting contractors, and generally supporting ADT efforts.
- Full time paid support staff for ADT could easily be justified based on the work that contractors are doing in this effort. This work could more easily be overseen by the state veterinarian if animal health staff were tasked with ADT outreach, ID distribution, and data entry. Unfortunately, even if federal funds were used to support this, state hiring policies do not permit it.

- Ability to communicate with farmers to educate them regarding ADT, and a working knowledge of animal movement, production, commerce, and disease risk are all desirable skills. Also, basic data entry skills and ability to query the database. Finally, minimal GIS skills to locate and update farm location inventory.
- One full-time employee would be needed to administer the plan and would allow expansion of it.
- Other human resources could still exist in the form of contractors.
- The state's preference would be to have the ability to hire a dedicated ADT employee to administer all aspects of the plan.

4.7.5 Budget requirements

- Currently ADT efforts are funded by VS cooperative agreement to hire contractors. State in-kind match is met by oversight, administration, and development by state animal health and management services employees.
- It is expected that funding will be used to enter extended contracts with the current providers, however, this plan expands the current roles of the contractors. See below:
    - Contractor to provide educational outreach and distribute information on procuring official ID to producers. Contractors would also provide data entry into Core-one. It is expected that this phase will cost approximately $27,500 per project year. These levels are based on funding levels through 2023. It is reasonable in light of the current fiscal situation on the state and federal levels that level funding is to be continued. Therefore, contractors should work under the assumption that funding levels will remain static through 2026.
    - Should budgets be reduced the contracts will need to be renegotiated and either the contractor will accept a lower rate for the same work, or the amount of work will need to be reduced to reflect the available funds.
    - Contractor will report at least quarterly to the RI State Veterinarian and the RI State Veterinarian will provide summary data on a quarterly basis to VS.
    - Total project budget is therefore expected to be approximately $55,500 annually to continue current ADT agreement objectives.
- Cost sharing is achieved by support from animal health staff, providing workspace for data entry and storage, providing

administrative support, and continuing development of the plan.

- The only real way for the applicant to insulate against budget cuts and short falls will be to renegotiate contracts with contractors to decrease scope of work to be done or to agree on a lower rate for completion of the same scope of work. It should be recognized that there is already sufficient insulation by use of outside contractors such that payroll costs associated with state employees have been eliminated.
- Other potential funding sources have been explored; however, none have materialized to date. Due to the all hazards nature of this plan, funding through DHS has been explored and will continue to be.

4.7.6 Outreach

4.7.6.1 Accredited veterinarians

- The state veterinarian will stress performance standards to accredited veterinarians and clearly state expectations for such matters as reporting their application of official ID, prompt submission of OCVIs, and how to correctly fill out official documents such as OCVIs, test charts, records of tag distribution, etc.
- Accredited veterinarians will be encouraged to adopt use of electronic OCVIs and RFID.
- It is not expected that accredited veterinarians will have a direct role in distribution of official tags to producers, however, they will be recipients of tags themselves. Having too many distribution sources will only have the effect of having more sources to search in the event of an animal trace. Therefore, it is expected that the Division of Agriculture will assist accredited veterinarians by providing them with LIDs so they can obtain tags directly from distributors. Vets and farmers will then need to record application to animals.
- As technology advances, accredited veterinarians will be notified of changes such as phase-out of NUES and phase-out of paper OCVIs. This will most easily be accomplished through direct email messaging targeted at accredited veterinarians.

4.7.6.2 Livestock markets

- Currently, RI has no permanent livestock markets. The only markets are occasional auctions held by faith-based groups or 4-H. These animal concentration points may be visited by RI Division of Agriculture personnel or contractors and

they have all been educated on and provided information regarding animal importation and identification rules.

- State regulations require that all markets keep records on source of animals as well as buyer. All official ID is recorded as the animals are accepted for consignment. If an animal is not officially identified it is identified with a "slaughter only" tag in the case of sheep and goats. Official ID tags will be applied to cattle and hogs upon consignment. Those animals that are imported for the sale but that do not meet state import requirements will be followed after the sale to ensure that they have been slaughtered as is required by regulation. Those that have not been slaughtered will be held under quarantine and the owners ordered to have slaughtered or tested to meet import requirements for individual species plus/minus penalty. All markets are required to make records available to Animal Health staff upon request. Compliance has historically been good.

4.7.6.3 Industry as a whole

- Livestock groups have been reached out to throughout the development of the federal rule. They have been offered opportunity to provide feedback to the federal government regarding the rule, or to the division of agriculture. They have likewise been notified that each state will be required to have an interoperable ADT plan.
- In addition to direct emails to industry leadership for distribution to producers, the RI State Veterinarian has distributed URLs for the USDA's website on traceability.
- Predictably, RI has a relatively small but diverse animal industry. There are currently about 7 licensed dairies, many small (<50 head) beef producers, a few large (>50 head) beef producers, three commercial layer operations, none over 30,000 birds, one broiler producer, one turkey producer, one large game bird farm, and under 200 sheep and goat producers, the majority of them being under 50 head. Most of the sheep and goat producers are small private dairies and/or raise their animals primarily as a hobby.
- A benefit to having a small state is that there is always easy access to animal health officials, figuratively and literally. All points within the state with the exception of one island community are within an hour drive.

4.8. Monitoring and reporting interstate movement activity (required)

- The number of animals and animal shipments will be recorded and collated by recording the data captured on OCVIs.

- It is assumed that the information will be accurate and there will be no need of verification for routine shipments of animals since the source of OCVIs for RI origin animals will be accredited veterinarians and the source of OCVIs for RI destination animals will be the SAHO in the state of origin. Obviously, verification of shipments of animals under question will ultimately need to be verified from the origin and destination state to verify that the destination state received the animal, and the origin state shipped the animal.
- The following data must be reported for quarterly reports: RI intends to comply and report the following data as applies.
    - Number of OCVIs and other interstate movement documents created within the State/Tribe/Territory on a year-to-date basis for move-out animals
    - Number of OCVIs and other interstate movement documents received for move-in animals
    - Number of animals by species and class for move-in events associated with OCVIs and other interstate movement documents, indicating the number of animals officially identified and the number not officially identified
    - Number of animals by species and class for move-out events associated with OCVIs and other interstate movement documents, indicating the number of animals officially identified and the number not officially identified
    - Volume of distribution for each official numbering system/device issued by the State/Tribe/Territory and/or AD office, including backtags by market or processing (slaughter) facility

V. TRACEABILITY IMPLEMENTATION

5.1 Ranking of priorities for advancement

- Specific steps for advancement over the current level for ADT are as follows:
    - Enhancement of electronic OCVI use by outreach to accredited veterinarians. This will be facilitated by phase-out of NUES tags.
    - Use of applications that facilitate electronic OCVI assimilation into Core-One. This will be facilitated by phase-out of paper OCVIs.
    - Targeted educational outreach to accredited veterinarians.
    - Continued and updated educational outreach to producers.
- It is not expected that a phase in approach would be necessary for RI to implement ADT.

5.2 Implementation of objectives

It is expected that implementation of the advancement objectives listed above can commence with the next work plan and can occur simultaneously. Therefore, the budget listed above will remain relatively static, provided funds exist, for the next three project years.