

PERMITTED MOVEMENT

FAD PReP

Foreign Animal Disease
Preparedness & Response Plan



**United States
Department of
Agriculture**

United States Department of Agriculture • Animal and Plant Health Inspection Service • Veterinary Services

The Foreign Animal Disease Preparedness and Response Plan (FAD PReP) Manual, Permitted Movement, provides valuable information on Federal, State, Tribal, international, academia, industry, and other organizations that would be involved in an foreign animal disease (FAD) event.

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Chapter 1

Introduction and Purpose of Document

1.1 INTRODUCTION

In a foreign animal disease (FAD) outbreak, the three goals of a response are to (1) detect, control, and contain the FAD in animals as quickly as possible; (2) eradicate the FAD using strategies that seek to stabilize animal agriculture, the food supply, and the economy, and to protect public health and the environment; and (3) provide science- and risk-based approaches and systems to facilitate continuity of business (COB) for non-infected animals and non-contaminated animal products.

Achieving these three goals allows individual livestock facilities, States, Tribes, regions, and industries to resume normal production as quickly as possible. They also allow the United States to regain FAD-free status without the response effort causing more disruption and damage than the disease outbreak itself.

Quarantine and movement control (QMC) activities are fundamental to rapidly contain an FAD; COB activities are essential to mitigating the economic consequences of an FAD outbreak. Both COB and QMC are identified as “critical activities” under the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Foreign Animal Disease Preparedness and Response Plan (FAD PReP).

Permits are the mechanism by which movements are allowed during an FAD outbreak. These permits allow *permitted movements*. Permitted movement, the topic of this document, intersects both QMC and COB. This document supersedes all existing definitions on permits and movements with regard to permitting into, within, and out of a Control Area during an FAD outbreak only.

1.2 PURPOSE

In a disease outbreak, permits are issued to move specific transports/items into, within, and out of regulatory Control Areas.¹ The purpose of this document is to provide information on permitted movement for all stakeholders—this *FAD PReP Manual 6-0: Permitted Movement* contains a mix of both general information as

¹ A Control Area is made up of an Infected Zone and a Buffer Zone. For a quick refresher on USDA APHIS zone and premises designations, please go to <https://www.aphis.usda.gov/animal-health/emergency-management/downloads/premises-and-zones.pdf>. For further information, please see the *APHIS FAD Framework: Response Strategies (FAD PReP Manual 2-0)*: www.aphis.usda.gov/fadprep. These definitions are also provided in Section 3.2 in this document.

well as procedures from the perspective of USDA APHIS. This document only applies to permitted movement in FAD outbreaks.

In an FAD outbreak, the USDA APHIS official information management system of record is the Emergency Management Response System 2.0 (EMRS2); USDA APHIS personnel use EMRS2 for all permitting processes, including issuing permits and tracking movements. While this document frequently discusses EMRS2, it does not provide detailed information on how to enter data into EMRS2. Step-by-step processes on EMRS2 data-entry are available through EMRS2 training courses and EMRS2 documentation. EMRS2 is the information management system which tracks and documents permitted movement if a regulatory Control Area has been established. If you need further information on how to enter data into EMRS2, please contact your Network

Associate: https://www.aphis.usda.gov/animal_health/emergency_management/downloads/emrs_networkassociates.pdf.

In addition, this document does *not* define specific criteria that must be met to be approved for a permit, which may vary by State, incident, origin/destination of movement, reason for permit, and item being moved. For specific permitting requirements, guidance may come from the Secure Food Supply (SFS) Plans, origin and destination States, the unified State-Federal Incident Command, and the APHIS National Incident Coordination Group (ICG).

In an FAD Incident...

In the event of an FAD incident, a regulatory Control Area is established and a unified State-Federal Incident Command usually leads response activities in the field. If permitting is required, and State(s) request USDA APHIS support, APHIS Veterinary Services (VS) uses EMRS2 as the official information management system of record to track and document these permitted movements.

1.2.1 Audience

This document is intended to provide responders, States, and all stakeholders with an overview of permitted movement during an FAD outbreak.

1.2.2 Goals

The following are USDA APHIS goals for permitted movement:

- ◆ To facilitate the issuance of permits during an FAD outbreak.
- ◆ To implement science and risk-based permitting guidance based on the best evidence available.
- ◆ To provide transparent information to States, stakeholders, and the public on USDA APHIS permitted movement processes.

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- ◆ To use EMRS2, the official USDA system of record, for issuing permits and tracking permitted movements into, within, and out of a regulatory Control Area during an FAD incident/outbreak.
 - ◆ To ensure permit data is entered into EMRS2 in an accurate and timely manner, reflecting best practices and standards.
 - ◆ To provide personnel to unified Incident Command and/or State(s) as requested by State(s) to support permitting activities in EMRS2 during an FAD outbreak.

While it is the objective of permitting to review and allow timely permitted movements in an outbreak, permitting can be delayed or interrupted during an incident for many reasons, including the volume of requests, diagnostic laboratory delays, epidemiological evidence/risk, verification of premises locations, or other reasons.

1.2.3 Related Documents

There are a number of available documents that also relate to permitted movement:

- ◆ The disease-specific *Response Plans: The Red Books*, offering general response policy (www.aphis.usda.gov/fadprep).
- ◆ Highly pathogenic avian influenza (HPAI)-specific policy documents, including *Overview of the HPAI Control Area Permitting Process* and *Overview of the EMRS2 Customer Permit Gateway* (www.aphis.usda.gov/fadprep).
- ◆ The *National Animal Health Emergency Management System (NAHEMS) Guidelines: Continuity of Business*, which presents the case for business continuity ([here](#)).
- ◆ The *NAHEMS Guidelines: Quarantine and Movement Control*, which provides general information on QMC activities in an FAD incident ([here](#)).
- ◆ The SFS Plans (poultry, milk, pork, and beef—see individual websites linked from www.aphis.usda.gov/fadprep).

Chapter 2

Roles and Responsibilities in Permitted Movement

This document provides information on the roles and responsibilities specifically applicable to permitted movement. For more information on general roles and responsibilities with regard to FAD outbreaks and FAD response, please review *APHIS FAD Framework: Roles and Coordination (FAD PReP Manual 1-0)*.

2.1 STATE ROLE IN PERMITTED MOVEMENT

2.1.1 Before an Incident

States may choose to use EMRS2, or any other information management system, prior to an animal health incident to store relevant data for their State. In addition to basic premises information (e.g., the physical location where the animals reside, contact information, and production type), these systems may also store data on routine diagnostic testing, biosecurity status, or other information that may be useful in an FAD incident.

2.1.2 During an Incident

USDA APHIS has broad authority to intervene during FAD incidents in the United States; typically State quarantines, under State authority, are placed on Infected, Contact, and Suspect Premises. All premises, including At-Risk and Monitored Premises, in the Control Area are subject to movement control restrictions—some States may also choose to quarantine these premises.¹ Please see Section 3.2 for the definitions of zones, areas, and premises that are used by USDA APHIS in an FAD outbreak.

In an FAD incident, EMRS2 is the system of record for USDA APHIS. All outbreak-related information within regulatory Control Area(s), pertaining to disease management, is entered into EMRS2 in a timely and accurate manner. Many States continue using their State system for recording outbreak-related information within their State. However, USDA APHIS recommends States use EMRS2 in an outbreak, and can offer support for EMRS2 as requested by the State.

¹ For more information on State and Federal authorities in QMC, please see the *NAHEMS Guidelines: Quarantine and Movement Control* for more information.

USDA APHIS realizes that permitting is inherently important to all States. While USDA APHIS prefers States use EMRS2 for permitting activities, if a State feels as if they have a permitting and information management system that can handle a potentially large number of requests rapidly during an FAD incident, including the ability to communicate with other States to receive approval for interstate movements, the State can use their system to issue permits and track permitted movements in an outbreak. Due to USDA APHIS authority over FAD incidents in the United States, this information must be communicated to the unified Incident Command for entry into EMRS2, even when EMRS2 is not used to issue permits for a State. There is a process in place to import these data into EMRS2 from other information management systems. EMRS2, or any other information management system used for permitting, does not guarantee, certify, or otherwise assume that all requirements for a permit have been met. EMRS2 facilitates the issuance of permits; it remains critical that responsible parties ensure and remain vigilant that any requirements are met, as necessary, for the issuance of permits. However, all information entered into EMRS2 by the unified Incident Command and/or State and USDA personnel is validated and considered to be the best known data at any given point in an incident.

Regardless of the information management system selected to issue and document permits during an FAD outbreak, USDA APHIS strongly recommends States refer to the information in this document and conduct permitted movement in the manner defined within to maintain a common understanding for all stakeholders.

2.1.3 Requesting Support for Permitted Movement

As seen in two recent outbreaks of HPAI in the United States, permitting can become a monumental task depending on the number of Infected Premises and regulatory Control Areas. In these outbreaks, multiple States requested USDA APHIS assistance for permitting activities; USDA APHIS is prepared to support any State experiencing an FAD outbreak upon their request. Working with the unified Incident Command, made up of both Federal and State personnel, USDA APHIS personnel with expertise in both EMRS2 and permitted movement support States with permit issuance and tracking for both response operations and continuity of business.

2.1.4 Additional State Requirements

Though a unified Incident Command typically manages the regulatory Control Area and associated response activities in an FAD outbreak, affected States may also establish additional enhanced active surveillance and testing criteria for premises located in the Surveillance Zones/Free Areas within their State (outside of any regulatory Control Area). In some situations, States may also require permits for movements in Free Areas depending on the scope and size of the incident—this type of permitting falls outside the scope of this document. Different States may have different requirements for the Surveillance Zone/Free

Areas; requirements within a State are under State authority absent a USDA Extraordinary Emergency Declaration or other type of national emergency declaration. Movements outside the scope of the Control Area (in other words, not going into, within, or out of a Control Area) during an FAD outbreak are not captured in EMRS2 and should continue under regular authorities (Federal and/or State), using existing processes, procedures, and guidance.

However, States should avoid placing additional, excessively burdensome restrictions on interstate movement of animals and products originating from *outside* the Control Area (once the Control Area has been established/defined) in FAD-affected States.² Finally, it is important to note that any existing entry requirements that States have in place prior to an outbreak must also be met for interstate movements on Interstate Certificate(s) of Veterinary Inspection, in addition to specific FAD permit requirements. These recommendations do not supersede existing State regulations or policy guidance.

2.2 USDA APHIS ROLE IN PERMITTED MOVEMENT

2.2.1 Prior to an Incident

USDA APHIS does not provide permits for movements related to FAD incidents until there is an FAD incident; in some cases, other types of permitted movement may be recorded in EMRS2 for program diseases for which there are ongoing Federal control programs. These other types of movements may be captured in EMRS2, including restricted movements requiring a Veterinary Services (VS) 1-27 Form. These movements are *not* covered as part of this document, and are not discussed further. For information on these type of movements, please refer to your VS District Office or Surveillance, Preparedness, and Response Services Commodity Center.

2.2.2 During an Incident

USDA APHIS has broad authority to intervene during FAD incidents in the United States. State(s) have primary authority over what occurs within their State; however, USDA APHIS—in coordination with State Animal Health Officials and the unified Incident Command—provides the oversight for interstate permitted movement (commerce) and any movement that relates to international trade.³ USDA APHIS is prepared to support State(s) in an FAD incident in all permitted

² However, in a known rapidly changing situation, such as early in an outbreak when the Control Area is first established, it may be appropriate for States to impose additional requirements or further restrictions until more epidemiological information—including trace back and trace forward information—is available.

³ In the event that there is an USDA Extraordinary Emergency Declaration or similar emergency declaration, USDA also has authority over intrastate movement (in addition to interstate trade and international commerce movements).

movement activities with relation to the Control Area (in/out/within), as requested by the State.

USDA APHIS uses EMRS2 to record permitted movement during an FAD incident. EMRS2 may be used to issue permits; if State(s) use their own system, permitted movement data will be uploaded or entered into EMRS2 for all movements that originate in the Control Area or end in the Control Area. EMRS2 is not used to record movements occurring outside of the regulatory Control Area(s). Movements outside the scope of the Control Area (in other words, not going into, within, or out of a Control Area) during an FAD outbreak should continue under regular authorities (Federal and/or State), using existing processes, procedures, and guidance. Further information on what is recorded in EMRS2 is provided later in this document.

EMRS2 is used in an incident to routinely produce reports on permitted movement. These reports are shared widely and used for further analyses, so it is critical that these data are entered in a timely and accurate manner. USDA APHIS has completed significant work on data standards in EMRS2, and continues to revise these data standards as necessary. For reporting to both internal and external stakeholders, it is important that data is entered consistently by all personnel in an FAD outbreak—whether State responders, the unified Incident Command, VS Districts, or directly by EMRS2 personnel.

2.3 USDA APHIS PERSONNEL ROLES

Permitting during an FAD incident requires a significant amount of data entry in close to real-time. For example, during the 2014–2015 HPAI outbreak, there were approximately 7,500 permits, and over 20,000 individual permitted movements associated with those permits, that were entered into EMRS2. USDA APHIS is prepared in an FAD outbreak or other animal health incident that requires permitting support to deploy personnel to the unified Incident Command Post, to the State affected (as requested), or to work remotely to support permitting requirements. The following personnel support permitted movement activities in EMRS2 during an FAD incident.

The EMRS2 National Coordinator, EMRS2 Staff Specialists, and EMRS2 Network Associates exist—and are active—in both “peacetime” and during a response. However, the VS National Incident Management Team (NIMT) position and National Permitting Unit are stood-up only during an FAD response effort that requires permitting.

2.3.1 EMRS2 National Coordinator

The EMRS2 National Coordinator, in National Preparedness and Incident Coordination (NPIC), or designee, is the lead for overseeing all USDA APHIS permit activities during an incident. This individual, or his/her designee,

integrates into existing Incident Command System organizational structures as appropriate for the incident. The National Coordinator, or designee, has experience not only in FAD outbreak response, but in-depth knowledge of EMRS2 and the EMRS2 Customer Permit Gateway.

2.3.2 EMRS2 Staff Specialists

EMRS2 Staff Specialists are dedicated EMRS2 staff members in NPIC; these personnel are available to assist States in permitting activities during an outbreak. These Staff Specialists augment any existing EMRS2 capabilities that are part of a NIMT; an additional EMRS2 Staff Specialist may be deployed as needed specifically to assist in data management, including permitting, as part of the unified IMT. EMRS2 Staff Specialists are highly skilled in EMRS2 and serve as a point of contact for EMRS2 questions, queries, and problems.

2.3.3 EMRS2 Network Associates

In addition to EMRS2 Staff Specialists, there are typically at least two EMRS2 Network Associates in every VS District. In addition to their routine duties, these Network Associates serve as the “first responders” for EMRS2 questions and issues within the Districts. EMRS2 Network Associates also serve as EMRS Specialists on the VS NIMTs. The knowledge of the Network Associates is likely to be leveraged in any animal health incident for accurate and timely data entry, including for permits. The EMRS2 Network Associates are identified here: https://www.aphis.usda.gov/animal_health/emergency_management/downloads/emrs_networkassociates.pdf.

2.3.4 VS EMRS2 Team

In addition to the personnel described above, there are additional individuals who support the IT requirements of EMRS2 behind the scenes, as well as “expert-users” that have been identified to augment any response effort. The EMRS2 National Coordinator directs all IT support personnel and also can request additional personnel dedicated full-time to EMRS2 activities during an FAD outbreak through the APHIS National ICG.

2.3.5 Incident Management Team Permitting Unit Leader

A Permitting Unit Leader may be mobilized as part of a VS NIMT during an incident. This individual is likely to be (but is not necessarily) an EMRS2 Staff Specialist or EMRS2 Network Associate, depending on the permitting requirements of the incident. This individual is in the Planning Section, under the supervision of the Planning Section Chief. In a unified Incident Command, where the affected State uses EMRS2, it is possible that this position could be filled by State personnel or a joint State-Federal co-unit leader.

2.3.6 National Permitting Unit

In some cases, the permitting requirements of an incident may be overwhelming. In these cases, a full-scale National Permitting Unit is established to support all permitting activities, including data-entry. The National Permitting Unit, like other emergency response entities, comes together when requested by the APHIS National ICG to support a response. This unit can be overseen by the VS NIMT Permitting Unit Leader with subject matter expertise and support from other EMRS2 personnel as needed. This National Permitting Unit consists of personnel with experience in permitting or EMRS2 during an outbreak, and they can rapidly assist in a State(s) permitting requirements for permitted movement. This National Permitting Unit may be virtual and support multiple incident locations across the United States. It is primarily responsible for augmenting VS NIMT permit capabilities, including implementing rapid data entry for permits not entered directly in the Gateway and also for data verification for permits entered into the Gateway.

Chapter 3

Defining Permits and Movements

This section provides definitions for permits and movements. Please note that the intention of these definitions is to provide a broad, conceptual framework for all stakeholders for shared communication. This terminology and its usage is important for all stakeholders to better understand the permitted movement process in an FAD outbreak. This document supersedes all existing definitions on permits and movements with regard to permitting into, within, and out of a Control Area during an FAD outbreak only.

3.1 INTRODUCTION

QMC is a critical activity to prevent the transmission of FADs in a regulatory Control Area. Movements are restricted on all premises in the Control Area: Infected, Contact, Suspect,¹ At-Risk, and Monitored Premises all are subject to varying degrees of quarantine and/or movement controls. In other words, all premises designations in a regulatory Control Area are subject to QMC activities of some type. Obviously, Infected, Contact, and Suspect Premises are significantly more restricted in their activities than At-Risk or Monitored Premises.

Permitted movement allows entities to make necessary movements without creating an unacceptable risk of disease spread. A permit may be issued for the movement of “any” item, depending, of course, on the outbreak scenario and epidemiological evidence—animals, animal products, potential fomites, materials, transports, etc.² A permit can be used for movement from any type of premises—Infected, Contact, Suspect, At-Risk, and Monitored Premises. However, different types of premises would not be approved for all types of permitted movements.

3.2 ZONES, AREAS, AND PREMISES

In order to frame the conversation around permitted movement, it is important to reference the existing zones, areas, and premises definitions. These definitions are found in FAD PReP disease response plans, as well as elaborated in *APHIS FAD*

¹ Suspect Premises are typically re-designated before response activities occur based on diagnostic testing and epidemiological information. In addition, it is preferable if Suspect Premises are re-designated before any type of movement on to/off of the premises (including feed and/or equipment) occurs.

² This document does not provide a list of items that can/cannot be permitted. While any item can theoretically be permitted, what items actually are permitted depends on the outbreak and guidance provided by the unified Incident Command and APHIS National ICG.

Framework: Response Strategies (FAD PReP Manual 2-0). Table 3-1 provides the zone and area designations, Table 3-2 provides the premises designations.

Table 3-1. Zone and Area Designations

Zone/area	Definition
Infected Zone (IZ)	Zone that immediately surrounds an Infected Premises.
Buffer Zone (BZ)	Zone that immediately surrounds an Infected Zone or a Contact Premises.
Control Area (CA)	Consists of an Infected Zone and a Buffer Zone.
Surveillance Zone (SZ)	Zone outside and along the border of a Control Area. The Surveillance Zone is part of the Free Area.
Free Area (FA)	Area not included in any Control Area. Includes the Surveillance Zone.
Vaccination Zone (VZ)	Emergency Vaccination Zone classified as either a Containment Vaccination Zone (typically inside a Control Area) or a Protection Vaccination Zone (typically outside a Control Area). This may be a secondary zone designation.

Table 3-2. Premises Designations

Premises	Definition	Zone
Infected Premises (IP)	Premises where a presumptive positive case or confirmed positive case exists based on laboratory results, compatible clinical signs, case definition, and international standards.	Infected Zone
Contact Premises (CP)	Premises with susceptible animals that may have been exposed to the FAD agent, either directly or indirectly, including but not limited to exposure to animals, animal products, fomites, or people from Infected Premises.	Infected Zone, Buffer Zone
Suspect Premises (SP)	Premises under investigation due to the presence of susceptible animals reported to have clinical signs compatible with the FAD. This is intended to be a short-term premises designation.	Infected Zone, Buffer Zone, Surveillance Zone, Vaccination Zone
At-Risk Premises (ARP)	Premises that have susceptible animals, but none of those susceptible animals have clinical signs compatible with the FAD. Premises objectively demonstrates that it is not an Infected Premises, Contact Premises, or Suspect Premises. At-Risk Premises may seek to move susceptible animals or products within the Control Area by permit. Only At-Risk Premises are eligible to become Monitored Premises.	Infected Zone, Buffer Zone
Monitored Premises (MP)	Premises objectively demonstrates that it is not an Infected Premises, Contact Premises, or Suspect Premises. Only At-Risk Premises are eligible to become Monitored Premises. Monitored Premises meet a set of defined criteria in seeking to move susceptible animals or products out of the Control Area by permit.	Infected Zone, Buffer Zone
Free Premises (FP)	Premises outside of a Control Area and not a Contact or Suspect Premises.	Surveillance Zone, Free Area
Vaccinated Premises (VP)	Premises where emergency vaccination has been performed. This may be a secondary premises designation.	Containment Vaccination Zone, Protection Vaccination Zone

In addition, Table 3-3 and 3-4 provide minimum sizes of zones and areas for an FAD outbreak. These zone sizes are *minimums*; there may be situations, incidents, and outbreaks where significantly larger zone sizes may be appropriate. While much of State and USDA APHIS VS experience with permitting comes from HPAI, it is critical to remember that the guidance in this document is intended to be applicable in any FAD outbreak and whatever zone size is appropriate. Remember, the larger the Control Area, the more movements within and the more difficult it will be to manage these movements; however, the larger the Control Area, the more confidence there is that the FAD has been confined to that area.

Table 3-3. Minimum Sizes of Zones and Areas

Zone or area	Minimum size and details
Infected Zone (IZ)	Perimeter should be at least 3 km (~1.86 miles) beyond perimeters of presumptive or confirmed Infected Premises. This will depend on disease agent and epidemiological circumstances. This zone may be redefined as the outbreak continues.
Buffer Zone (BZ)	Perimeter should be at least 7 km (~4.35 miles) beyond the perimeter of the Infected Zone. Width is generally not less than the minimum radius of the associated Infected Zone, but may be much larger. This zone may be redefined as the outbreak continues.
Control Area (CA)	Perimeter should be at least 10 km (~6.21 miles) beyond the perimeter of the closest Infected Premises. Please see Table 3-1 for factors to consider in determining the size of a Control Area. This area may be redefined as the outbreak continues.
Surveillance Zone (SZ)	Width should be at least 10 km (~6.21 miles), but may be much larger.

Table 3-4. Minimum Sizes of Zones and Areas for Mosquito or Culicoides Vector-Borne Diseases

Zone or area	Minimum size and details
Infected Zone (IZ)	Perimeter should be at least 10 km (~6.2 miles) beyond perimeters of presumptive or confirmed Infected Premises. This will depend on disease agent and epidemiological circumstances. This zone may be redefined as the outbreak continues.
Buffer Zone (BZ)	Perimeter should be at least 20 km (~12.4 miles) beyond the perimeter of the Infected Zone. Width is generally not less than the minimum radius of the associated Infected Zone, but may be much larger. This zone may be redefined as the outbreak continues.
Control Area (CA)	Perimeter should be at least 30 km (~18.6 miles) beyond the perimeter of the closest Infected Premises. Please see Table 3-1 for factors to consider in determining the size of a Control Area. This area may be redefined as the outbreak continues.
Surveillance Zone (SZ)	Width should be at least 20 km (~12.4 miles) but may be larger depending on the known geographic range of vector.

3.3 PERMITS

A *permit* (can be paper, electronic, or both) is used to approve and document movements into, within, and out of a regulatory Control Area. A *permit* conveys two critical pieces of information: (1) approval for a movement (from a specific origin point A to a specific destination point B) and (2) approval for a specific item associated with this movement (animals, products, materials, etc.). A *permit* typically also defines specific requirements that must be met for movement, depending on the item that is moved (e.g., diagnostic testing); this may be considered the third critical piece of information. A *permit* must be approved by the origin State (where the movement begins) and, if an interstate movement, the destination State (where the movement ends).

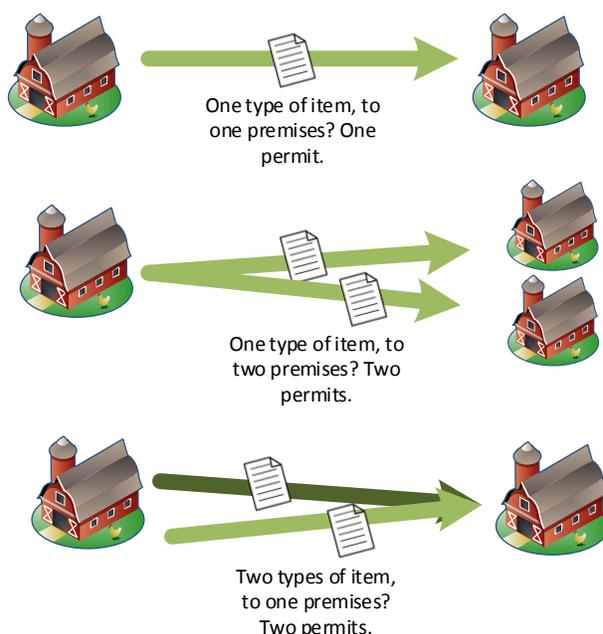
Only one permit is typically created to track all movements of the same item type from a specific origin premises to the specific destination premises for a specific time period (e.g., while the Control Area is in place). A permit is usually not required for every movement, as long as the two components of a permit do not change (the movement origin and destination and the item moved). Additionally, if the requirements of the permit change, a new permit is typically also required.³ Figure 3-1 illustrates examples of when one permit is required and when two permits are required: if there are multiple destinations or multiple items being permitted for movement, multiple permits are required. If there is a single item and a single destination, only one permit is required.

If you are a producer, in a Control Area, and unsure whether you need a permit, request a permit from the unified Incident Command/your State Animal Health Official. They can provide further information and notify you if a permit is not required.

³ And, as a reminder, the permitted movement and any associated requirements must be completed and documented prior to the movement taking place.

Figure 3-1. Overview of Permits

A PERMIT tracks associated activities between two locations. It specifies what can move, when it can move (frequency), and for how long it can move (start/end date). A permit may also list further conditions required for movement.



3.4 TYPES OF PERMITS

There are two primary types of permits: specific and COB. The first type of permit relates to controlling and containing the FAD outbreak, particularly for biocontainment (keeping the disease on Infected Premises) and bioexclusion (keeping the disease out of non-infected premises). The second type of permit is for maintaining business continuity in an outbreak for premises that are affected by the disease Control Area and associated movement restrictions, but not infected by the FAD agent.

There are Two Types of Permits

In an FAD outbreak, there are two types of permits issued: specific permits and COB permits. The first type of permits relate to controlling and containing the disease outbreak, ensuring that Infected Premises do not let the FAD off their premises and non-infected premises do not bring the FAD on their premises. The second type of permit—the COB permit—is to facilitate business continuity/continuity of operations for non-infected premises which are inside the regulatory Control Area.

3.4.1 Specific Permit

Infected, Contact, and Suspect Premises are under quarantine during an FAD outbreak and movements on to/off of these premises are highly restricted. On

these premises, movement is prohibited unless a *specific permit* is issued by the unified Incident Command for two overarching reasons: critical movements (e.g., animal welfare) and essential movements related to response activities.⁴ Critical movements are movements that must occur to ensure the welfare of animals during an FAD outbreak, and could include the movement of feed. Essential movements are movements that must occur to respond effectively to the FAD outbreak, based on the judgement of the unified Incident Command and APHIS National ICG. This could include moving animals to slaughter or moving carcasses to an off-site disposal location. These two reasons are not necessarily mutually exclusive.

Examples of specific permits which occur from an Infected, Contact, or Suspect Premises could include the following:

- ◆ Movement of carcasses to landfill (essential movement).
- ◆ Movement of a feed truck on to an Infected Premises for animal welfare (critical movement).
- ◆ Movement of animals to slaughter (critical and essential movement).

However, not all response activities that involve a movement require a permit. For example, crews may be going on to and off of an Infected Premises on a daily basis to conduct response operations like depopulation, disposal, and virus elimination. This crew does not need a permit to enter or leave the premises with a vehicle. However, responders performing response activities are required to follow stringent biosecurity measures to contain the FAD agent to the Infected Premises and mitigate transmission risks; the unified Incident Command and/or State and APHIS officials can provide more information on these activities during an incident.

Specific permits and associated requirements should be based on science and risk-based information. USDA APHIS recommends the following guidance for the unified State-Federal Incident Command in deciding when to require specific permits for movement to/from Infected, Contact, and Suspect Premises.⁵ All specific permits are entered into EMRS2. A VS 1-27 form may be requested based on the unified Incident Command's discretion for specific permits.

The unified Incident Command, in coordination with the APHIS National ICG as necessary, makes decisions regarding the risk-level of movements to/from

⁴ These groupings are conceptual to improve transparency and understanding in the permitted movement process; these categories are not identified in EMRS2 and may not be routinely used in all incident communication or are often used synonymously.

⁵ These risk groupings are based loosely on the Center for Epidemiology and Animal Health (CEAH) definitions of these likelihood ratings, where risk means that additional disease transmission will occur: negligible = the likelihood that the event will occur is insignificant, or not worth considering; low = it is very unlikely that the event will occur; moderate = the event is unlikely but does occur; high = there is more than an even chance that the event will occur.

Infected, Contact, and Suspect Premises. It is not possible—a priori—to categorize each and every movement that may occur to or from a premises; the level of risk will depend on outbreak-specific circumstances. As such, the examples here are provided as hypotheticals only.

3.4.1.1 NEGLIGIBLE RISK MOVEMENTS (NO SPECIFIC PERMIT REQUIRED)

Movements that are highly unlikely to transmit the disease agent should be allowed without a specific permit to facilitate response activities in the Control Area. These movements should, however, adhere to all established mitigating procedures like biosecurity measures (e.g., truck and driver biosecurity). These movements and requirements are administered on-site.

Example: Movements from an Infected Premises to remove equipment from composting activities, after composting activities are complete and piles have been released, may be a negligible risk if appropriate mitigating procedures are followed (e.g., disinfection of equipment).

3.4.1.2 LOW RISK MOVEMENTS (SPECIFIC PERMIT MAY BE REQUIRED)

Movements where there is some risk to transmit disease, but this risk is low and mitigated by biosecurity measures, may require a specific permit at the discretion of the unified Incident Command. Whether or not a permit is required for movement should be based on epidemiology of the outbreak, risk of the specific movement, and other relevant factors.

Example: Movements of feed or feedstuffs off of a Suspect Premises may be low risk with appropriate mitigating procedures.

3.4.1.3 MODERATE OR HIGH RISK MOVEMENTS (SPECIFIC PERMIT IS REQUIRED)

Movements that have moderate or high risk of transmitting the FAD always require a specific permit for movement. Appropriate biosecurity and mitigating measures must be implemented to reduce the risk of disease transmission wherever possible. High risk movements should be avoided.

Example: Movements of carcasses off of an Infected/Contact/Suspect Premises may be a moderate to high risk, even with appropriate mitigating procedures.

3.4.1.4 ASSESSING RISK FOR SPECIFIC PERMITS

For some products or movements, such as carcasses to landfill, there may be quantitative or qualitative risk assessments or peer-reviewed literature regarding the risk of disease transmission for the movement of that specific item. However, in most cases, during an outbreak, a practical, common sense-based approach is

taken to determine the risk of the movement (negligible, low, moderate/high). The unified Incident Command needs to take into account characteristics including—but not limited to—the following in making their assessment, with the acknowledgment that there is often a need to make such decisions quickly and without complete information:

- ◆ What is the likelihood of the FAD agent being transmissible from the movement (e.g., is the disease agent alive)?
- ◆ How close are non-infected premises?
- ◆ What is the susceptible animal population density in the surrounding area?
- ◆ What are the potential consequences of disease transmission?

This ad-hoc “risk-assessment”⁶ during an incident for specific permits is typically informal and based on the best judgment of the unified Incident Command and available subject matter experts, which may be Federal/State officials or academic/industry experts. This risk-assessment process for specific permits should not delay movement; the unified Incident Command should err on the side of caution when the risk is unknown or transmission risk is not well understood.

3.4.1.5 REQUIREMENTS FOR ALL MOVEMENTS FROM INFECTED, SUSPECT, AND CONTACT PREMISES

Based on risk, the unified Incident Command must identify whether other criteria are required for these critical and essential movements in a response, both those that require a specific permit as well as those that do not (negligible risk). These may include specific biosecurity measures—such as truck washes—when entering and leaving a premises, personnel-specific biosecurity measures, etc. The unified Incident Command is responsible for ensuring all responders are aware and follow these procedures, and that all requirements are met for specific permits prior to movement.

In some cases, the unified Incident Command and/or APHIS officials may request that a VS 1-27 form be used to issue specific permits for an incident, or for certain specific permits. This form can be uploaded in EMRS2 and the permit and permitted movement information can be entered and tracked in EMRS2 as for any other specific permit.

3.4.2 Continuity of Business Permit

The second primary type of permit is the most commonly known and understood, the *COB permit*. COB permits are for COB movements in an FAD incident, from At-Risk Premises or Monitored Premises. While specific permits are rarely for interstate movements, COB permits are commonly both intrastate and interstate.

⁶ This may be an ad-hoc risk assessment or a similar science- and risk-based evaluation such as a technical memorandum of understanding.

COB permits, generally speaking, can be for movements into, within, or out of the Control Area. Different permitted movements are allowed depending on whether the premises is an At-Risk Premises or a Monitored Premises.

Within COB permits, there are two secondary types of permit: the operational permit and the animal/animal product permit, also known as a Secure Food Supply (SFS) permit. These subsets of permits are for two different types of movements. First, operational permits are for normal movements—such as that of equipment, service crews, and carcasses—that must continue for the non-infected premises to continue operations during an outbreak.⁷ Second, SFS permits are for the movement of animals/animal products that help to facilitate a healthy and safe food supply in an outbreak. Both types of permits support overall COB during an outbreak. Further detail on these permits are provided below.

3.4.2.1 OPERATIONAL PERMIT

Both At-Risk Premises and Monitored Premises may require operational permits. Operational permits are not used for animals/products/commodities; they are used to permit normal movements such as service delivery, some feed movements, removing mortality, etc. For example, a service crew moving on to or off of an At-Risk or Monitored Premises may require a permit. These permits are typically for the following:

- ◆ normal movements that may have a non-negligible level of risk, and
- ◆ movements *within* or *out of* the Control Area to/from either At-Risk or Monitored Premises.

What types of movements on to/off of At-Risk and Monitored Premises require an operational permit, as well as what additional criteria are required to obtain this permit, is based on guidance from the unified Incident Command, APHIS National ICG, and origin/destination State officials. An ad-hoc process for risk assessment may be required. Operational permits are less common than SFS permits.

3.4.2.2 SECURE FOOD SUPPLY PERMIT

Second, the animal/product/commodity permit, or SFS permit, are permits for the movements of animals and animal products into the supply chain for further feeding, growing, processing, or to market. These permits are intended to facilitate the security of a safe, healthy food supply for the United States in an FAD outbreak, by focusing on allowing non-infected premises move animals and animal products towards or into the market supply chain. Requirements for SFS

⁷ At times, some movements—for example, rendering mortality off-site—may be postponed, cancelled, or be required to complete significant mitigations due to known risk of the movement spreading disease from an unknown Infected Premises.

permits originate from both the SFS plans for poultry, milk, pork, and beef—and from unified Incident Command in concert with State and APHIS officials.⁸

Based on the definitions of At-Risk and Monitored Premises provided in Section 3.2, At-Risk Premises may be eligible to receive SFS permits to make permitted movements *within* the Control Area; Monitored Premises may be eligible to receive permits to move both *within* and *out of* the Control Area. It is important to note that States and/or APHIS officials, depending on the outbreak situation, may decide that to receive an SFS permit, the premises must become a Monitored Premises regardless if movement is within or out of the Control Area.⁹ Some SFS plans also indicate this requirement (to become a Monitored Premises before movement can occur). However, in large outbreaks with large Control Areas (e.g., an entire State), it may not be possible or practicable to establish that premises meet all the requirements to become Monitored Premises before certain movements are permitted. Allowing At-Risk Premises to make permitted movements under an SFS permit is a critical response option that should not be eliminated for all diseases, all incidents, or all types of movements. In addition, there may be—and can be—specific requirements that At-Risk Premises have to meet before a SFS permit is approved: these may not be as stringent as those for Monitored Premises, but could include additional measures such as specific biosecurity standards.

The SFS plans offer guidance and suggested requirements, but they may need modification during an FAD outbreak. Additionally, the unified Incident Command and State/APHIS officials provide information on animals and animal products that are not covered by existing SFS plan guidance or recommendations.

3.4.2.3 CRITERIA REQUIRED FOR CONTINUITY OF BUSINESS PERMITS

COB permits have defined criteria that must be met for permit approval and associated movement; these criteria are ideally identified ahead of time for SFS permits (though changes can always be made based on outbreak situations), and provided as guidance to all stakeholders. For operational permits, the unified Incident Command and State/APHIS officials determine and establish appropriate criteria.

For both SFS and operational permits, these criteria are based on the level of risk of the movement, and may include diagnostic testing (very common),

⁸ Significant State, APHIS, industry, and academia effort has gone into making the SFS plans. These plans offer guidance and recommendations, and may be accepted in an outbreak. However, each FAD incident is different and may necessitate further review or modification of existing SFS guidance; during an outbreak, it may be necessary to establish a public-private-academic group that can work to inform COB permitting if requested by the unified Incident Command or APHIS National ICG

⁹ Movements *within* the Control Area may be permitted from At-Risk Premises because the risk/movement remains within the Control Area. Whether At-Risk Premises are allowed to make SFS movements during an outbreak may depend on the size of the outbreak, the size of the Control Area, biosecurity information about At-Risk Premises, and other relevant information.

epidemiological information, strict biosecurity standards, and other requirements. States can verify that these criteria or qualifications have been met before they approve the movement (both the origin State and destination State).

The unified Incident Command and State/APHIS officials may both issue guidance on what movements require a COB permit, as well as guidance on minimum criteria for COB permitted movement. For example, in the recent HPAI outbreaks, the APHIS National ICG provided additional guidance on minimum diagnostic testing requirements for SFS permits. For interstate movements, though destination States may elect to mandate additional criteria (above the minimum) be met for movement, States are encouraged to accept the requirements and guidance established collaboratively by the unified Incident Command and State/APHIS officials.

3.4.2.4 ASSESSING RISK FOR CONTINUITY OF BUSINESS PERMITS

While risk-assessment for specific permits is typically an ad-hoc process that must be completed quickly, for some COB permits—particularly SFS permits—a detailed qualitative risk assessment has been completed by the APHIS VS CEAH. These commodity-specific risk assessments (by VS CEAH) on movement are available for specific products.¹⁰ These risk assessments review the likelihood that the specific movement will cause disease transmission, *if* the origin premises is infected but undetected. The criteria required for movement is directly related to the level of risk identified. While there has been significant risk-assessment work completed for HPAI and poultry products, and to a slightly lesser extent for foot-and-mouth disease (FMD), there are not detailed risk assessments for many pathogens.

Therefore, in some cases, especially for operational permits as well as SFS permits for diseases not products not yet assessed, there may be the need to move an item that has not yet undergone the official risk-assessment process. In this case, unified Incident Command personnel, State/APHIS officials, and subject matter experts (such as the VS CEAH Risk Analysis Team) can quickly perform an ad-hoc risk assessment.¹¹ This ad-hoc risk assessment would be similar to the process described above for a specific permit, answering questions including (but not limited to) the following:

- ◆ What is the likelihood of the FAD agent being transmissible from the movement (e.g., is the disease agent alive)?

¹⁰ For information on the risk assessments that have been conducted, please review the individual SFS webpages for more information. For example, the summary of a Secure Milk Supply assessment is here: <http://securemilksupply.org/Assets/SMS-Proactive-Risk-Assessments-Results-Summary.pdf> and a link to the full document can be found here: <http://securemilksupply.org/plan-components.php>.

¹¹ This may be an ad-hoc risk assessment or a similar science- and risk-based evaluation such as a technical memorandum of understanding.

-
- ◆ How close are non-infected premises?
 - ◆ What is the susceptible animal population density in the surrounding area?
 - ◆ What are the potential consequences of disease transmission?

It is important to note that in some cases, there is an important need to balance the risk of movement versus the risk of not moving the item. For example, not moving milk or liquid egg can mean that this product must be disposed of; disposal may pose significant and additional challenges and could also present an additional risk of virus spread that product movement may not. Certainly this is not always the case, but it is an important consideration in making permitted movement decisions. Similarly, it is important to prioritize requests for ad-hoc review and ensure that the unified Incident Command and the APHIS National ICG have open communication pathways and readily share information on risk-related issues.

Because this type of movement is not directly related to the response effort (response activities), some additional time may be taken to perform this assessment in comparison to that for a specific permit. However, it should be the goal of the unified Incident Command to make a decision within 48–72 hours; producers can assist by making permit requests for operational and SFS permits well before the movement needs to occur. Some States may elect to consider a delay in movement when a new Control Area is established until certain requirements, like specified surveillance, are completed.

3.4.3 Summary of Permit Types

Table 3-5 summarizes the different types of permits issued for permitted movement.

Defining a Permit

A permit is used to approve and document movements from a particular origin premises to a destination premises, into, within, and out of a regulatory Control Area. Requirements needed depend on the type of permit and item moved. All permits must have State of origin approval; for interstate movements, in addition to origin State approval, the destination State must also approve the permit.

Table 3-5. Summary of Permit Types¹²

Type of Permit	Type of Premises	Details	Into/Within/Out of Control Area?	Intrastate or Interstate?	Example
Specific Permit	Infected, Contact, Suspect	Includes critical movements (e.g., animal welfare) and essential movements (e.g., response activities). Specific permit may/may not be required based on risk and unified Incident Command recommendation.	Can be into, within, or out of Control Area; into or within Control Area more common.	Usually intrastate, rarely interstate.	Movement of animals on a Suspect Premises to a slaughter establishment in the Control Area.
Continuity of Business Permit	Operational Permit	Includes normal movements necessary to keep non-infected premises within the Control Area in business during an outbreak. Permit requirements/criteria based on unified Incident Command, APHIS National ICG, and State officials recommendation.	Usually within or out of Control Area.	Can be intrastate or interstate.	Movement of mortality off of an At-Risk Premises to outside of the Control Area. ¹³
	SFS Permit	Includes animal and animal product movements into the supply chain for feeding, growing, processing, or to market. Helps to secure the U.S. food supply during an outbreak. Permit requirements/criteria based on Secure Food Supply Plans and/or the unified Incident Command, APHIS National ICG, and State officials recommendation.	At-Risk Premises can only move within a Control Area; Monitored Premises can move within or out of a Control Area. Movements into the Control Area are less common.	Can be intrastate or interstate.	Movement of washed and sanitized shell eggs from a Monitored Premises to market outside of the Control Area.

3.5 TYPES OF MOVEMENTS

In an FAD outbreak, there are different types of movements—some are permitted, others are simply tracked by either the unified Incident Command or producers. In many FAD response efforts, it simply is not possible to approve a permit for each and every movement (including personal movements of children to school buses,

¹² These permit types are conceptual. There is not a specific field in EMRS2 that captures these different permit types; however, the fields in EMRS2 allow these types to be separated and analyzed distinctly as required by the incident or at request of internal or external stakeholders.

¹³ At times, some movements—for example, rendering mortality off-site—may be postponed, cancelled, or be required to complete significant mitigations due to known risk of the movement spreading disease from an unknown Infected Premises.

visitors to the home, etc.) on to or off of a premises in the Control Area. This section discusses different types of movements; movements that generally do not relate to the animal business being conducted on the premises are outside the scope of this document. However, it is important that biosecurity guidance is clearly communicated to the producer and implemented for these movements as needed, such as mail delivery, a spouse driving to/from an unrelated job each day, children going to school, etc.

The three types of movements are as follows: permitted movements, tracked conveyances, and routine movements.¹⁴ Permitted movements are those movements associated with an approved permit; tracked conveyances are movements that are tracked in EMRS2 but do not require a permit. Routine movements are not tracked in EMRS2 and also do not require a permit, though the producer may be required to keep enhanced records of these movements.

It is a State's responsibility for ensuring producers in their State know what type of movements require a permit, what requires no permit but reporting to the State and/or the unified Incident Command, and what requires enhanced record keeping by the producer. It is important that the State(s) communicate this information to producers in an accurate and timely manner.

3.5.1 Permitted Movement

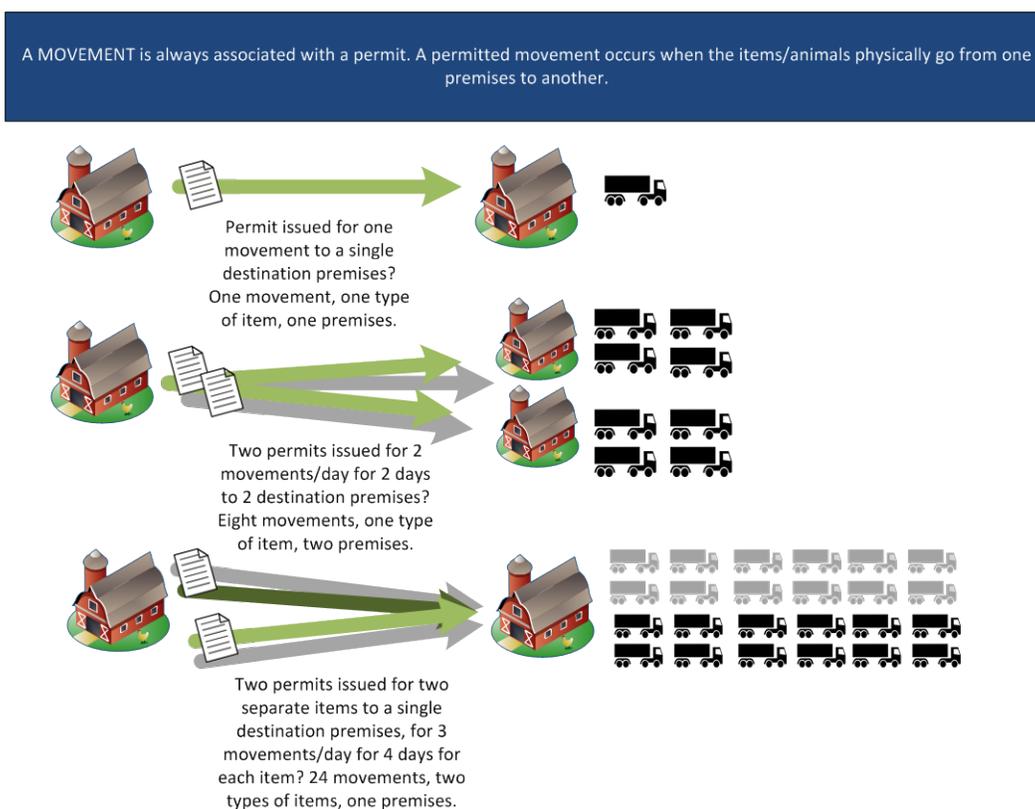
After a specific or COB permit (either operational or SFS) has been approved, the items, animals, or products specified in the permit record can be moved from the specified origin to the specified destination. This is a *permitted movement*. Each permitted movement for a specific permit and a COB permit is *always* recorded in EMRS2 in an FAD outbreak, even if the State elects to issue a permit from their own information management system—this data is subsequently entered into EMRS2 by unified Incident Command or EMRS2 personnel.

Because a single permit can be used to move multiples of the same item between two premises, most incidents will have more “permitted movements” than “permits” in EMRS2; each individual permitted movement is entered in EMRS2 when there are multiple movements against a single permit. COB permits are more likely to have multiple, associated permitted movements than specific permits.

Figure 3-2 provides an illustration of permitted movements for a COB permit(s). For example, if a premises has a single permit to move washed and sanitized eggs to a single destination facility, that premises may move 3 loads per day for 7 days (21 permitted movements in total), as specified by that individual permit. This is just an example showing the distinction between a permitted movement and a permit—the permit details this type of information, as discussed in a later section.

¹⁴ There are multiple types of movements that may be captured in EMRS, including those that are restricted (VS 1-27 Form) or traced (as part of an epidemiological investigation), these are not further discussed in this document.

Figure 3-2. Overview of Movements



3.5.1.1 CRITERIA FOR PERMITTED MOVEMENTS

Specific and COB permits may lay out criteria that is required to be met for a permitted movement to occur. This criteria must be met *before* the movement occurs. In general, it is the responsibility of the producer to ensure this criteria is met and at the discretion of the origin and destination State to validate or check that this criteria has been met as desired. Further information on this process is included in in Chapter 5.

3.5.2 Tracked Conveyances

Tracked conveyances are negligible-risk movements that can move into, within, and typically out of a regulatory Control Area without a permit—in other words, the origin and destination State(s) do not need to permit these movements with a COB permit.¹⁵ Based on the experience of HPAI, these tracked conveyances are typically negligible risk products that are leaving a Food Safety and Inspection Service (FSIS)-inspected plant (e.g., FSIS-inspected pasteurized liquid egg; other products may also be tracked conveyances but are not defined at this time). These

¹⁵ Just because tracked conveyances do not require a permit does not imply that a premises does not need biosecurity: premises moving tracked conveyances—and all susceptible premises during an outbreak—should implement, monitor, and enforce their premises biosecurity plans to reduce the risk of disease introduction.

tracked conveyances should be reported to the origin State and/or unified Incident Command as they are typically entered in EMRS2: tracking enables transparency, allowing both the origin and destination States to view these conveyances, even without a permit being issued.

3.5.3 Routine Movements

There are many movements that continue in a Control Area during an outbreak; it is not possible to permit each and every movement. *Routine movements* are normal movements from At-Risk and Monitored Premises that do not pose beyond a negligible risk, thereby not requiring an operational permit. Routine movements also must not be of animals or animal products—these require an SFS permit. Service crews and equipment pick-ups or deliveries may be considered routine movements in an outbreak. Routine movements are not entered in EMRS2. Routine movements are for items/movements that are “proclaimed” to be acceptable by State(s) and the unified Incident Command to move without a permit during an outbreak, which may vary by outbreak as well as within an outbreak.

Routine movements do not require a COB permit of either type and are more commonly intrastate. If the movement is interstate, the unified Incident Command, origin/destination State, and APHIS officials determine whether or not it is a routine movement or requires an operational permit (under COB permit). For example, particularly in cases where premises are on or near State boundaries where business is routinely conducted, it is possible that responsible regulatory officials determine that the movement should be categorized as a routine movement, thereby not requiring an operational permit. However, it may be possible that the origin and destination State do not agree on what is a routine movement—the destination State could then require an operational permit for such movement. States may decide independently what they consider to be a routine movement—and what is not.

3.5.3.1 CRITERIA FOR ROUTINE MOVEMENTS

Routine movements are still in the Control Area, which means there are heightened requirements for producers to make such movements. First, elevated biosecurity measures are necessary. Second, enhanced record keeping—auditable at any time by the unified Incident Command and/or State—is required by the producer. The unified Incident Command, State, and APHIS officials determine these specific criteria required for movement and communicate these to the producer.

3.5.4 Summary of Movement Definitions

Table 3-6 summarizes the definitions that stakeholders should be aware of for movement.

Table 3-6. Summary of Definitions for Movement¹⁶

Term	Explanation	Example	Requirements	Approval
Permitted Movement	A permitted movement is the type of movement associated with a permit (specific or COB). One or more permitted movements can be associated with a single permit, but each movement is recorded separately. If a permit is issued for multiple movements, these movements must be for the same item and between the same two premises, in the same direction.	Three separate truckloads of washed and sanitized eggs moving between the same two premises in the Control Area are associated as permitted movements to a single permit.	Tracked in EMRS2. The specific requirements associated with the permit must be met for the permitted movements that are associated with that permit.	State of origin and State of destination must approve permit which allows the associated permitted movements.
Tracked Conveyances	A type of movement that does not require a permit. Tracked conveyances originate from FSIS-inspected establishments and are negligible-risk products.	Pasteurized liquid egg loads moving out of a Control Area from a FSIS-inspected processing facility in a Control Area.	Typically tracked in EMRS2. FSIS-inspection.	Notification to State of destination but no approval required.
Routine Movement	Routine movements are a type of movement that does not require a permit. All movements must be negligible risk and not require a COB permit (either SFS or operational, so no animals or animal products). Often intrastate, but can be interstate movements with agreement of State origin and State of destination.	Movement of washed and sanitized egg-crates from At-Risk and Monitored Premises; personal or business movements off of and on to a premises (e.g., to the post office).	Not tracked in EMRS2. Elevated biosecurity, enhanced record keeping and other requirements as dictated by the State of origin/unified Incident Command.	State of origin (and State of destination for interstate movement) and unified Incident provide general proclamation of what categories or items are routine and can move without a permit; this can change during the outbreak.

¹⁶ There is a specific field in EMRS2 which captures whether the movement is a permitted movement or a tracked conveyance.

Chapter 4

Introduction to Permit Requirements & the EMRS2 Customer Permit Gateway

As specified, there are two primary types of permits that may be issued during an FAD incident: specific and COB (COB permits are broken in to two secondary types: operational and SFS). All permits help to ensure that movement does not result in further transmission of the FAD and work towards the goal of the outbreak response not doing more harm than the FAD itself.

All FAD PReP Disease Response Plans and multiple ready reference guides, like the *FMD Response Plan: The Red Book* and the policy guidance document *HPAI: Movement Control* provide information on movement control and broad guidance on what is allowed/not allowed to move from the various premises designations during an outbreak (into the Control Area, within the Control Area, and out of the Control Area). This guidance is very general and gives the unified Incident Command significant discretion. These documents are available from www.aphis.usda.gov/fadprep.

This chapter provides introductory information on permitted movement requirements and the permitting process.

4.1 INFORMATION REQUIRED FOR A PERMIT¹

There are seven key pieces of information that are required to obtain any type of permit; these data are recorded in EMRS2 in as close to real-time as possible during an FAD outbreak. If a State elects to use an information system other than EMRS2 to issue permits in an outbreak, these data must be communicated to the unified Incident Command for import or entry into EMRS2.² During an outbreak, it is critical that data is entered into EMRS2 in a consistent, timely, and accurate manner. Depending on the disease outbreak, additional guidelines may be provided by EMRS2 personnel to the unified Incident Command and National Permitting Unit on the items below to ensure data is being entered consistently for all permits.

¹ The different permit types are conceptual. There is not a specific field in EMRS2 that captures these different permit types; however, the fields in EMRS2 allow these types to be separated and analyzed distinctly as required by the incident or at request of internal or external stakeholders.

² While tracked conveyances do not require a permit, the same information is required to track conveyances.

-
1. **Permit Class.** This indicates the origin/destination location with regard to the Control Area, e.g., into Control Area, out of Control Area, or within Control Area.
 2. **Permit Reason.** This is the reason a permit is required, e.g., direct to farm, direct to landfill, into commerce, or direct to slaughter.
 3. **Origin Premises.**³ This is the premises that the movement originates from, including the national premises identification number (PIN) and physical latitude/longitude of the front gate where the animals are located.
 4. **Destination Premises.** This is the premises where the movement ends, including the national PIN and physical latitude/longitude of the premises.
 5. **Items.** This is the item that is permitted and allowed to move, e.g., manure/litter, feed, eggs, groups of animals; species of animals also needs to be defined.
 6. **Item Class.** This is the class of item that is permitted, based on the description provided in items; e.g., if the items permitted were “groups of animals,” the item class offers further description about the species/type of this animal.
 7. **Duration/Span of Permit.** This provides information about the first movement date for movements associated with a permit, as well as how long the permit is valid for. It provides information about how long the movement(s) are expected to continue.⁴

4.1.1 Additional Requirements Prior to Movement

Permits and their associated permitted movement(s) may have additional requirements that must be met before the movement is made. These records and documentation can be uploaded in EMRS2 for review by relevant parties. For SFS permits in particular, the permit is likely to specify additional criteria that need to be met for each movement. For example, specific diagnostic testing may need to occur prior to initiation of the movement. Mortality reports from the

³ A premises (origin and destination) must be established in EMRS2 prior to the issuance of any permits. Physical addresses must not include PO Boxes, residences, or headquarters—it must be the actual location of the animals. If States hold premises data in a system other than EMRS2, they can request these premises be validated and imported into EMRS2 prior to an incident (which is preferred). For more information, please contact your EMRS2 Network Associate or refer to the document *EMRS 2.0: Premises Data Transfer to EMRS2 from External/State-Based Systems* (www.aphis.usda.gov/fadprep).

⁴ This is the “start date” and “end date” of the permit: for example, the end date may be the known date of the last movement if there are a discrete number of planned movements under the permit *or*, for example, the date the Control Area is projected to be released if movements will continue throughout the outbreak. The unified Incident Command or destination State(s) may provide additional guidance on the duration/span of the permit for the specific incident.

origin premises may be required to qualify for a permit. Diagnostic testing results can be entered into EMRS2 or automatically messaged, if the testing laboratory can message results (strongly preferred), and attached to the origin premises in EMRS2.

4.1.2 Time Required for Permit Issuance

Requests for specific permits should typically be submitted to the unified Incident Command for review as soon as the need for the permit is identified. For COB permits (both SFS and operational), a permit request should be completed at least 24–48 hours prior to movement; longer if it is known well in advance that animals/animal products need to move for an SFS permit.

Premises should keep in mind that at any time, the issuance of permits may be delayed due to the volume of requests, delays in diagnostic results, changes in response operations, location verification problems, epidemiological changes, or other reasons pertaining to the specific incident. The unified Incident Command will make every attempt to issue permits in a timely manner given the other competing priorities for resources in an incident. If needed, specific permits will have priority over COB permits because of their direct applicability to FAD control and containment.

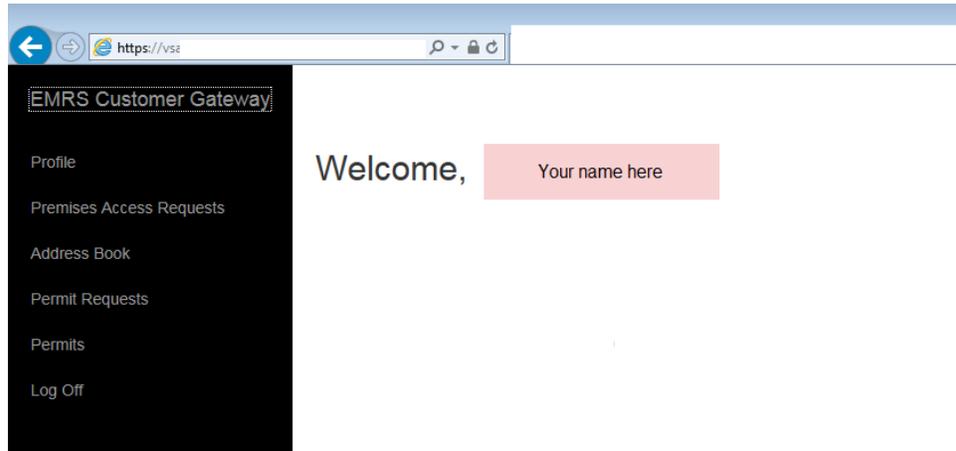
4.2 INTRODUCTION TO THE EMRS2 CUSTOMER PERMIT GATEWAY

4.2.1 General Information and Benefits

The EMRS2 Customer Permit Gateway, also referred to as “the Gateway,” is a new, producer-facing portal that provides an automated linkage from a website to the EMRS2 system. The Gateway is an interactive, secure, web-application, where registered producers can create a permit request for movement. The producer never interacts with the EMRS2 system directly—all data is entered directly into the Gateway, which is simple and easy to use. Figure 4-1 shows the EMRS2 Customer Permit Gateway immediately after log-in.

The Gateway has important benefits and greatly streamlines the permitting process. First, it offers producers a way to see the real-time status of their permit requests. Second, it facilitates timely and accurate data entry into EMRS2, the USDA APHIS official system of record for FAD outbreaks. The use of the Gateway does not change the overall permitted movement process or permitting concepts. The document *HPAI Ready Reference Guide—EMRS2 Customer Permit Gateway* also offers an overview of the Gateway. Appendix A provides an update on the current status of the Gateway and information for producers who want to register and for States who already use EMRS2.

Figure 4-1. EMRS2 Customer Permit Gateway



4.2.2 Producer Responsibility

Producers, if they register to use the Gateway, are responsible for understanding permit requirements and conditions for movement and agree to follow criteria outlined in any approved permit request that occurs through the Gateway. By accepting an approved permit and conducting movements, the producer is certifying that they have met all required criteria. They also agree not to compromise the security or integrity of the web-based Gateway in any way.

4.2.3 What Can Be Done in the Gateway

There are six distinct actions that an *already registered* producer can perform in the EMRS2 Customer Permit Gateway:

1. Request access to see/view known premises or accounts (e.g., premises that the producer owns and manages that are already established in EMRS2).
2. Create an address book entry for premises they own or manage (one or multiple).
3. Initiate a request for a permit.
4. Check the status of any producer initiated permit request.
5. Download approved permit(s) in a PDF format.
6. Enter movement(s) associated with an approved permit.

Chapter 5 provides more additional information on how the Gateway fits into the overall permitting process for COB permits (operational and SFS).

Chapter 5

Permitting Process

There are eight general steps involved in permitting. The process is broadly the same regardless of the type of permit—specific or COB (operational or SFS). However, specific differences in processes between these permit types are outlined below.

Remember, a conveyance—product from a USDA Food Safety and Inspection Service-inspected facility that is negligible risk—does not require a permit or permit request for movement, but is typically entered in EMRS2 and available for the origin State and destination State to view in EMRS2. A routine movement is not permitted and does not go through this process.

5.1 STEP 1: REQUEST PERMIT

5.1.1 Specific Permit

For a specific permit, the unified Incident Command determines if a permit is required for movement. If the permit is required for movement, either the producer needing to make the movement or the unified Incident Command can initiate the permit request. At this time, specific permit requests are not made through the Gateway and should be made through normal communication channels between the producer (of the Infected, Suspect, or Contact Premises) and the unified Incident Command—which may often be an assigned Case Manager or dedicated e-mail address to unified Incident Command personnel. Specific permits may receive priority for review in the permit request queue as they relate directly to response operations and the containment/elimination of the FAD.¹

5.1.2 Continuity of Business Permit

COB permits (operational and SFS) must be requested by the producer. It is preferable if these requests are made through the Gateway (Figure 5-1 and Figure 5-2), though if a producer is not registered, all existing methods can be used to make a permit request (e.g., an e-mail to State and/or APHIS officials or the unified Incident Command). SFS permit requests, in particular, should be made

¹ In the future, requests for these permits may be made through the Gateway. However, because these requests are typically initiated by the unified Incident Command or a producer via a case manager, there is not a significant advantage to make these through the Gateway as the unified Incident Command directly enter the request in EMRS2. Additionally, because these requests are higher risk and/or require coordinated action—possibly across States—normal communication channels are more appropriate to secure the coordination of resources and personnel required for this type of permit and permitted movement.

through the Gateway. It is highly recommended that producers with potentially large volumes of SFS permitted movements register in the Gateway and request SFS permits through that mechanism to ease data-entry burdens on the unified Incident Command and help ensure the timely issuance of permits. After registration in the Gateway, the permit request is the first step towards an approved permit (Figure 5-3). If there is any doubt whether a permit is required for movement, a producer should request a permit.

Figure 5-1. Initiating Permit Request through the Gateway

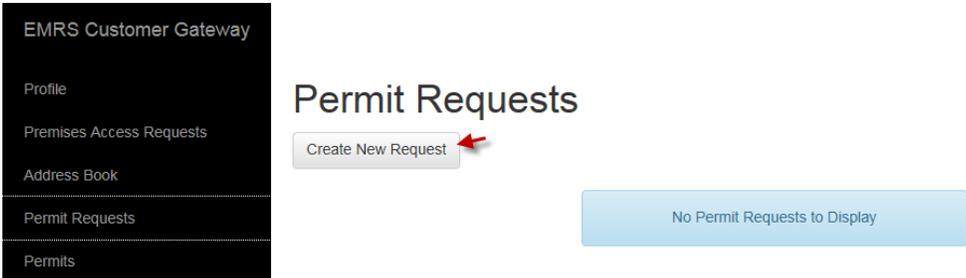


Figure 5-2. Entering Permit Request through the Gateway

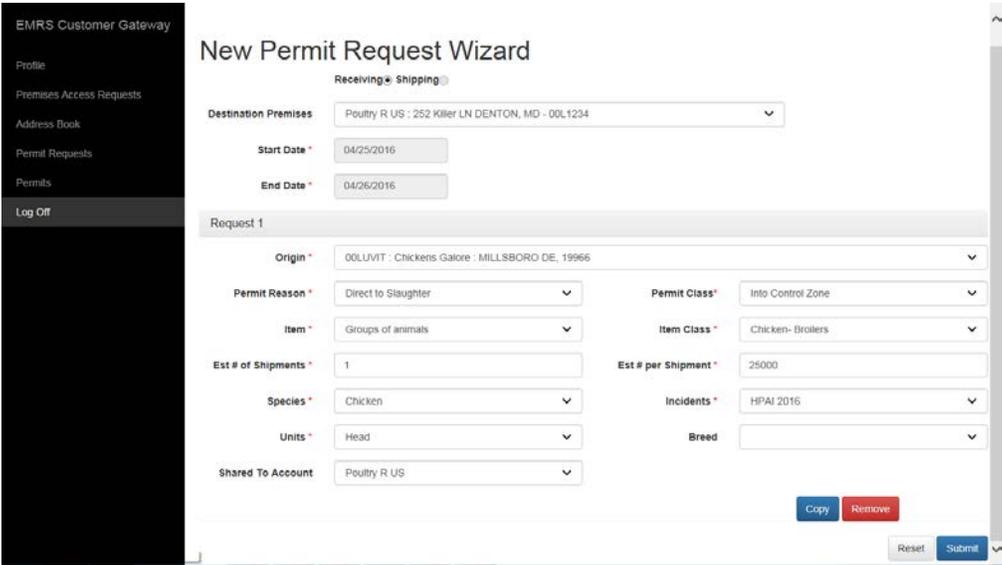


Figure 5-3. Status: Permit Request



When submitting permit requests with the Gateway, it is easiest to work first from the point of concentration. In other words, if you have a single premises *receiving*

the bulk of the movements, select that premises as the destination premises first, and then select the different origin premises from your address book. There is a copy button in the Gateway that can be used to expedite this process.

All COB permit requests (operational or SFS), regardless of whether they are submitted through the Gateway or by a producer through traditional means (phone or e-mail), end up in queue in EMRS2 for review as specified in Step 2 and then Step 3. COB Permit requests are most typically handled in the order in which they are received, unless there is an exceptional situation which would dictate prioritizing movements for animal welfare reasons or other circumstances.

5.2 STEP 2: ENTER/CONFIRM DATA IN EMRS2

In the case of both primary types of permits (specific and COB), personnel in the origin State and/or unified Incident Command personnel review the data entered for the permit request. For specific permits not requested through the Gateway, personnel must create a new permit request (enter data in EMRS2) in the permit request queue and review this request for completeness. For COB permit (operational or SFS) requests through the Gateway, the data does not need to be entered in EMRS2: it appears automatically in the permit request queue once submitted by the producer in the Gateway. As soon as the data is complete, the permit request is accepted and it becomes a pending permit (Figure 5-4).

Figure 5-4. Status: Accepted Permit Request to Pending Permit



For all types of permit requests, this basic quality assurance/quality control (QA QC) administrative check is undertaken to ensure all information required is submitted; this QA QC process does not review any permit documentation and does not require personnel trained in permitted movement requirements. The QA QC process ensures the data is complete and the origin premises is in EMRS2. It *does* check the location of the origin premises with respect to the regulatory Control Area. If a producer is requesting a permit but actually not in the Control Area, they will be referred to a State official for further guidance for movement activities outside of the Control Area. Again, this data confirmation step leads to the permit request being accepted (Figure 5-4); as soon as the permit request is accepted, it becomes a pending permit and Step 3 begins. Permit requests can also be rejected at this step—for example, if it is a duplicate request or for a movement that is a tracked conveyance and does not require a permit. If the permit is rejected, the requestor will receive an email notification and the status in the Gateway will change to rejected; if this rejection is not the result of an error or

duplication, the requestor is typically contacted by a member of the unified Incident Command regarding the reason for rejection. If a permit is rejected and the requestor believes that the rejection is a mistake, they can resubmit the permit request and contact their State representative if there are additional questions.

For permit requests entered through the Gateway (in Figure 5-5), a producer can modify a permit request at any time until the permit request has been submitted into the Gateway and accepted by the origin State. At this time, the permit request is locked and cannot be changed. This is the data that will appear in EMRS2. In the event that changes are required for an accepted permit request, State personnel using EMRS2 or EMRS2 personnel must be notified to make these changes directly in EMRS2 (they will subsequently appear in the Gateway).

Figure 5-5. Viewing Permit Requests in the Gateway

Request ID	Origin	Destination	Account	Start Date	End Date	Permit Class	Permit Reas...	Item Class	!
PREQ.10000...	00LUVIT	00L1234	Poultry R US	03/24/2016	03/25/2016	Into Control...	Direct to Sla...	Chicken- Bro...	Accepted
PREQ.10000...	0065KOT	00L1234	Poultry R US	03/24/2016	03/25/2016	Into Control...	Direct to Sla...	Chicken- Bro...	New
PREQ.10000...	0081OMG	00L1234	Poultry R US	03/24/2016	03/25/2016	Into Control...	Direct to Sla...	Chicken- Bro...	New
PREQ.10000...	00LUVIT	00L1234	Poultry R US	04/25/2016	04/26/2016	Into Control...	Direct to Sla...	Chicken- Bro...	New

5.3 STEP 3: REVIEW PENDING PERMIT AND DOCUMENTATION

The review of the pending permit is substantive, and requires trained personnel that understand permitted movement and the permit requirements for a specific or COB permit (SFS or operational). For interstate movements, Step 3 (review) and Step 5 (approval/denial) are both required for all pending permits, regardless of permit type. However, for pending permits that are for intrastate movements, since the origin State and destination State are the same, Step 3 and Step 5 are inherently combined: the origin State can review and approve the pending permit/documentation simultaneously, since there is no other State that must approve the pending permit.

In an outbreak, State(s) and the unified Incident Command can become overwhelmed by permit requests. If necessary, the National Permitting Unit can be established and support the origin State to rapidly review the permits in EMRS2.

5.3.1 Specific Permit

For a specific permit, the unified Incident Command and/or State official review the pending permit. Because this permit was requested at their recommendation or

with their knowledge for ongoing response activities, they confirm the pending permit is as recommended and still required. The unified Incident Command and/or State also review any documentation provided by the producer or responders for the permitted movement. Due to the disease transmission risk of specific permits, the unified Incident Command may prescribe and dictate additional biosecurity measures that must be taken for the pending permit to be approved and permitted movement to occur from the Infected, Suspect, or Contact Premises based on the current outbreak situation.

5.3.2 Continuity of Business Permit

If desired by the origin State, automated e-mails can be sent after the permit request is accepted in EMRS2, notifying the origin State that a pending permit is ready for review.² For COB permits (operational and SFS), it is imperative that the origin State reviews the pending permit and any documentation. COB permits, particularly SFS permits, frequently require additional criteria that must be completed before the permitted movement occurs, such as biosecurity measures and/or diagnostic testing. It is at the State's discretion how much documentation to require from the producer (indicating that the requirements have been met) and at what intervals this documentation is required to be submitted and/or re-reviewed by the State. All supplementary, required documentation for a permit can be uploaded directly into EMRS2 by State and/or unified Incident Command personnel.³

The origin State has three options at this stage for the pending permit:

1. Status the pending permit as a "Reviewed Permit;" recommend approval to destination State (Figure 5-6); present the Reviewed Permit to the destination State.
2. Status the pending permit as a "Reviewed Permit;" do not recommend approval to destination State; present the Reviewed Permit with this "do not recommend approval" notification to the destination State.
3. Reject the pending permit (for example, if the premises has not met the requirements to move items out of the Control Area); do not present pending permit to the destination State.

² In all cases where automated e-mails are sent from EMRS, these e-mails can be turned on or off based on the States' preferences and volume of permits.

³ In the future, it may be possible for producers to upload required documentation in the Gateway. Again, test results should be messaged directly from the laboratory to EMRS and not uploaded in the Gateway. Further guidance will be released as capabilities are developed.

Figure 5-6. Status: Reviewed Permit



5.4 STEP 4: ORIGIN STATE NOTIFIES DESTINATION STATE OF REVIEWED PERMIT

After the origin State reviews the pending permit, the destination State (if different than origin) is notified that there is a reviewed permit. Again, this notification or forwarding of the reviewed permit can be done automatically, via EMRS2, in a preset e-mail. If the origin State elects to use their own information management system for permitting, they must also have a mechanism to document the notification to the destination State that a permit has been reviewed by the origin State. If needed, in a large outbreak, an established National Permitting Unit can also streamline this process for origin State(s).

5.4.1 Specific Permit

Typically specific permits are for intrastate movements, so no additional notification is required. In rare cases, specific permits may be issued for interstate movement—for example, when a Control Area borders a neighboring State, and materials need to be moved for disposal. While the origin State notifies the destination State of the reviewed permit, this should *not* be the first the destination State is informed of the need to make this movement.

For specific permits for interstate movement, State Animal Health Officials and/or APHIS officials communicate as early as possible about the need for movement, mitigating procedures, and agreement on the movement. Because of the risk of disease transmission for movements from Infected, Suspect, and Contact Premises, the reviewed permit notification is just the formal, finalized request that this movement can occur—the foundation of this agreement and collaboration between the two States must be established well before this step in the process.

5.4.2 Continuity of Business Permit

COB permits (both operational and SFS) are frequently interstate, requiring the origin State to notify the destination State that there is a reviewed permit. Reviewing a pending permit for requirements (Step 3), being notified that there is a reviewed permit (Step 4), or accepting or acknowledging this notification

(Step 4) at no point means that the destination State has approved the permit. The permit approval comes in Step 5.

5.5 STEP 5: DESTINATION STATE APPROVES OR DENIES PERMIT

For any permit that is proposing interstate permitted movement—whether specific or COB (operational or SFS)—the destination State always has the opportunity to approve or deny the reviewed permit that is issued by EMRS2, after the reviewed permit notification is sent in Step 4. When a reviewed permit is approved by the destination State, it becomes an “Approved Permit” (Figure 5-7). If the permit is denied, the permit process ends. If the destination State approves the reviewed permit, the destination State enters an “approved” date and an “expiration” date.

Figure 5-7. Status: Approved Permit



When there are criteria required for the permit, like diagnostic testing results, the destination State can elect to review any/all documentation related to these criteria and, importantly, enter any conditions for the permit/permitted movement into the EMRS2 record. Supplementary, required documentation can be sent to the destination State directly by the producer or origin State; however, it is preferable that any such documentation is uploaded in EMRS2 for all parties to review.⁴ It is important to remember that requirements for permits may change throughout the outbreak. When approved, the EMRS2 permit record also lists the official that approves the request for the destination State.

5.5.1 Diagnostic Test Results

Diagnostic test results should be messaged from the laboratory directly to EMRS2 for permitted movements; in addition to requiring more time and increasing the opportunity for error, diagnostic laboratory results that are not messaged directly to EMRS2 may not be received and matched to a premises in time to make a permitted movement in a timely manner. In the movement record, there is the ability to record and link the laboratory accession number and date to each and every permitted movement that occurs. In addition, there is a field in the Gateway that

⁴ In the near future, it may also be possible for the producer to upload documents into the Gateway, such as a list of required control measures that the premises has implemented. Please note: test results should be messaged from the laboratory; not uploaded as documents.

says “negative PCR results,” where the date of the negative PCR results should be entered by the producer.

5.5.2 Concurrence of Destination Premises

In addition to approving the permit from a State level, it is the responsibility of the destination State to confirm with the destination premises that the permitted movement from the origin premises and origin State is acceptable to the destination premises, and that the destination premises is willing to accept the movement. The destination premises, based on applicable State/Tribal/local authorities, may have the ability to reject a reviewed permit. At this stage, rejection by the destination premises—through communication with the destination State—results in a denied permit. State(s) may have specific communication procedures, processes, and/or a form to confirm the acceptability of the movement with destination premises prior to the approval of the reviewed permit.⁵

5.5.3 Revoking a Permit

It is important to note that if the epidemiological situation changes, or at the destination State’s discretion, a permit may be revoked at any time. States are encouraged to make their decisions based on the best science- and risk-based information available during an FAD outbreak. Both destination and origin States can revoke a permit in EMRS2, or can contact EMRS2 personnel or the unified Incident Command to revoke a permit.

5.5.4 Bulk Approval

In some cases, States may need assistance to rapidly approve many permit requests—this occurred during the 2014–2015 HPAI outbreak. If necessary, the National Permitting Unit can help destination States approve large quantities of permit requests rapidly, acting on behalf of the State through careful communication and collaboration.

5.6 STEP 6: DESTINATION STATE NOTIFIES ORIGIN STATE OF DECISION

When a destination State approves a reviewed permit, as soon as it is approved, Step 6 quickly follows. For any reviewed permit that requires destination State approval, the destination State must notify the origin State whether they approved or denied the reviewed permit. This formal notification also serves as further documentation in EMRS2 that the destination State received notice of a reviewed

⁵ While the destination State confirms the acceptability of the movement with the destination premises, it is common for an origin premises and destination premises to communicate independently regarding the movement and mutual desire to make the permitted movement during an outbreak.

permit and responded. This step is critically important so that States do not subsequently question if movements were made without prior approval.

This notification can be sent by EMRS2; as soon as the destination State approves the reviewed permit (creating an approved permit), the origin State receives an automated e-mail that there is now an approved permit. In high-volume situations, the origin State may elect not to receive automated e-mail messages since they will be checking the permit queue frequently. If the permit request was initiated in the Gateway, it will then appear as “approved” in the Gateway for the producer to see.

5.7 STEP 7: ORIGIN STATE/UNIFIED INCIDENT COMMAND ISSUES PERMIT

For approved permits, Step 7 also takes place in rapid succession to Step 6: once the reviewed permit is granted approval and the destination State notifies the origin State of an approved permit, the permit can be created in EMRS2 and issued immediately. For specific permits, the unified Incident Command or origin State personnel familiar with EMRS2 typically produce the permit form in EMRS2. For COB permits (operational and SFS), the origin State may create the permit form in EMRS2. Reach-back assistance can always be requested for permitting support.

EMRS2 generates physical permits (electronic PDF forms that can be printed) through templates, which easily puts the origin and destination premises as well as relevant information (e.g., permit number, issuance date, conditions). There is a list of permit templates in EMRS2 that can be selected for use: origin States can supply their own permit templates to EMRS2 personnel (ideally ahead of the outbreak) for use. This allows the State to put their State-specific language and logo on the permit if desired.

This process can be completed in bulk for approved permits so it is not time consuming for large permit volumes. These PDF permits can then be distributed quickly to the origin State, destination State, as well as the producer. If needed, origin States can also attach diagnostic testing information to these permits for distribution to the producer and/or destination State. As soon as the permits are issued from EMRS2, if they were requested through the Gateway, they are also available in the Gateway as a PDF attachment so the producer has easy access to their approved permits; the producer receives an e-mail as soon as the PDF is attached in the Gateway.

5.8 STEP 8: PERMITTED MOVEMENT OCCURS

Once a permit is approved, specific conditions are met, and notification of the forthcoming permitted movement has occurred (either by the unified Incident

Command and/or State personnel entering the movement into EMRS2, or the producer entering the movement into the Gateway, depending on the type of permit), the movement itself can occur.⁶ This movement may occur once (common for specific permits), or multiple times (common for COB permits), as recorded in the permit. Each permitted movement (if there is more than one for a given permit) should be entered in EMRS2 or the Gateway.

Please note that while the destination State must approve each permit, once the permit is approved, the destination State does not approve each individual movement if there are multiple movements associated with the permit (any type) *unless* they have specified that each movement must be approved in the conditions of the permit (Step 5).

5.8.1 Specific Permit

Specific permits are more likely to be one-time permitted movements, or multiple permitted movements over a short time-span. Each permitted movement is entered into EMRS2 by the unified Incident Command and/or State personnel with the support of EMRS2 personnel as requested. Movements should always be entered *before* the movement actually occurs.

5.8.2 Continuity of Business Permit

For permitted movements associated with COB permits (operational or SFS) entered in the Gateway, as soon as a permit is approved, movements (one or multiple, depending on the permit) can be added in the Gateway by the producer. All requirements for a permitted movement must be met prior to movement. Again, all movement notifications should be entered prior to movement. When there is an approved permit and a permitted movement is added, the status of the permit becomes “Movements in Progress.” Figure 5-8 illustrates entering movements into the Gateway.

⁶ An automated email will notify the origin State and destination State that a movement has been entered; these emails can be disabled as desired.

Figure 5-8. Entering Movements Associated with a COB Permit in the Gateway

Permit Information

Permit Name	Approval Date	Expiration Date	Origin Premises	Destination Premises	Permit Reason	Permit Class	Species	Items	Item Class
PM.1268.15	04/06/2015	06/20/2015	MS, Bird	MS, Bird	Direct to Slaughter	Into Control Zone	Turkey	Groups of animals	Turkey- Meat Birds

New Movement

Date Moved * # Items Moved *

Neg Test Dates

Item Description

Existing Movements

Movement Name	Date Moved	# Items Moved	Neg Test Dates	Item Description	PDF (Last Modified On)
MV.1722.15	04/06/2015	1	None	Birds	
MV.1913.15	04/13/2015	21900	None	Birds	
MV.4894.15	05/11/2015	31600	None	Birds	

At any time, the destination State—and origin State—can review the documentation associated with the permit or with the permitted movements where there is defined permit/movement criteria. In addition, the destination State can request to receive an automated e-mail from EMRS2 that indicates when a permitted movement has been entered in the Gateway by a producer. However, producers can enter permitted movements into the Gateway and make these permitted movements as specified on the approved COB permit (operational or SFS) without further approval.

It is the responsibility of the producer to understand permit requirements and ensure they meet all of the permit criteria with every movement and have all documentation required by the COB permit criteria if it is requested. It is also the producer’s responsibility to ensure that all results of any required testing is entered *prior to* movement (negative test result dates are noted in the Gateway), along with the date of the movement and the amount of the item moved. It is the responsibility of the destination State to review this documentation and request documentation from the origin State/producer when necessary.

In the Gateway, when all movements are completed for a given COB permit, the status will move to “Movements Completed” and the permit will no longer be visible. If a producer needs to make additional movements, they must request a new permit.

5.8.3 Moving Without a Permit

In an FAD outbreak, moving without a permit can cause inadvertent disease transmission to naïve premises and threaten the control, containment, and eradication efforts. Moving without a permit may be punishable by applicable and

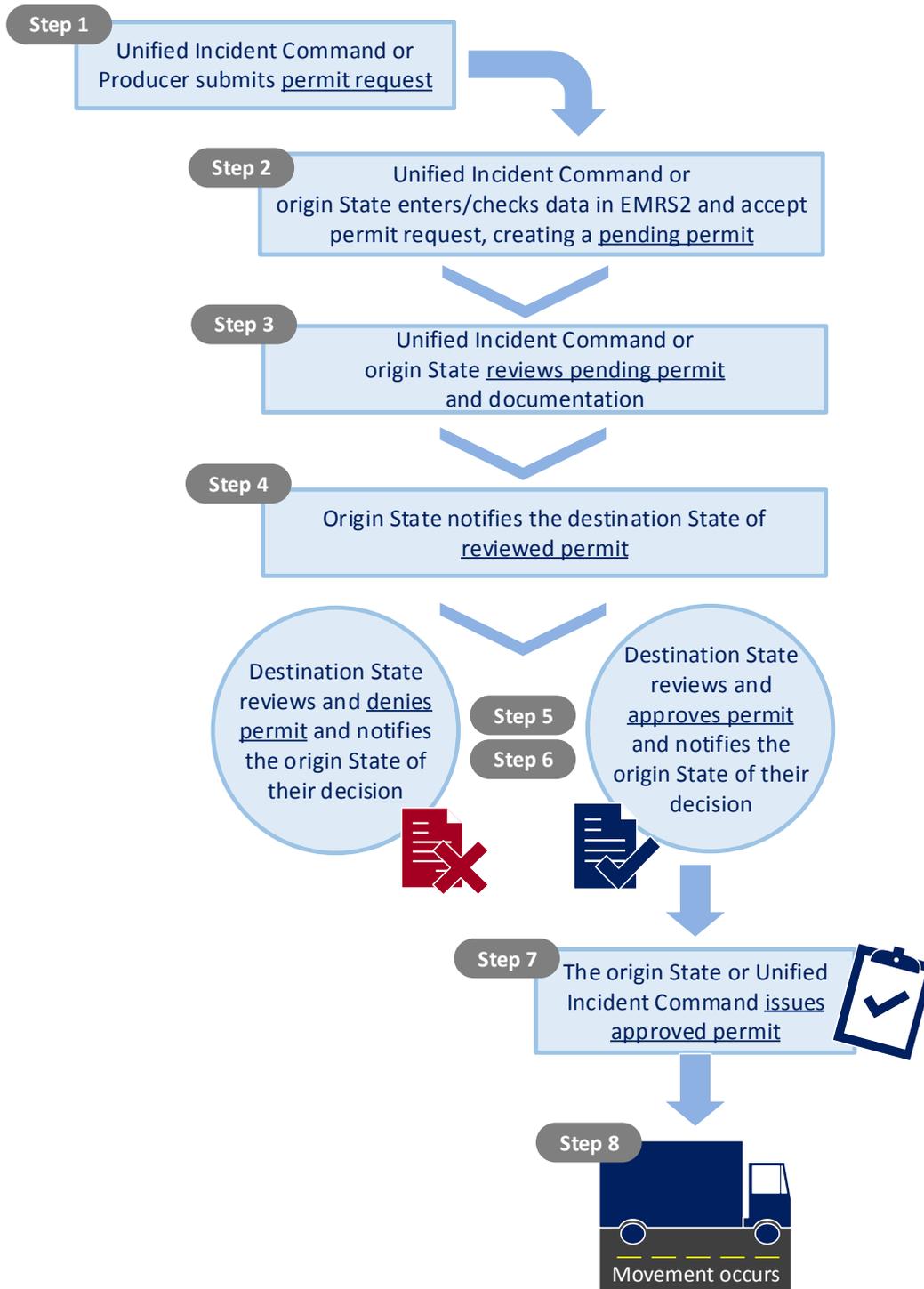
relevant local, county, State, Tribal, and/or Federal law. Producers and owners must be familiar with authorities, laws, and regulations in their jurisdictions.

5.9 SUMMARY OF PERMITTING PROCESS

5.9.1 All Permit Types

Figure 5-9 illustrates the permitting process for all types of permits in very general terms, not including the use of the Gateway. Figure 5-9 summarizes the 8 steps.

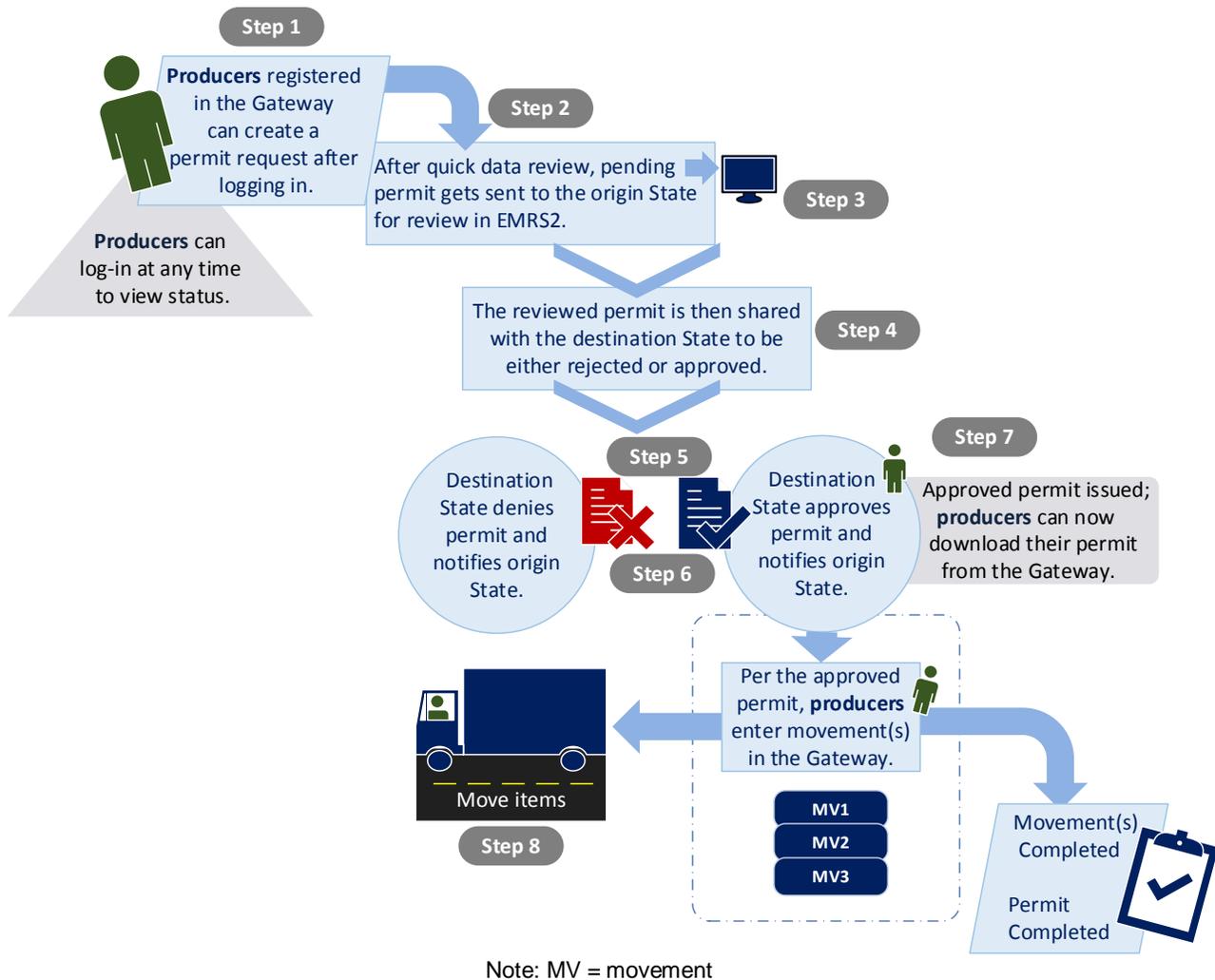
Figure 5-9. Overview of the Eight Steps in Permitted Movement



5.9.2 Continuity of Business Permits in the Gateway

Figure 5-10 provides a more specific figure that illustrates the process for COB permits (operational and SFS) when producers register in the Gateway, request permits through the Gateway, and enter movements into the Gateway.

Figure 5-10. Overview of COB Permit Process Using the EMRS2 Customer Permit Gateway



5.10 DATA ENTRY IN EMRS2 FOR PERMITTED MOVEMENT

There is complete documentation available on how to conduct permitting, including data entry and record creation, in EMRS2. This documentation includes information on creating a permit directly in EMRS2—as may be required, particularly for specific permits, by the unified Incident Command. It also provides guidance on entering the required fields for a permit request, such as Items to Permit, Item Class, Description of Items, and Units, and more detailed guidance on reviewing a permit in EMRS2.

Additional documentation is also available for the Gateway, for producers that need further guidance on how to use the system, or how to enter large volumes of permit requests or movements quickly.

For State(s) that use EMRS2 and need information for their personnel on reviewing and approving/denying permits in EMRS2, additional training or materials can be requested by contacting the EMRS2 National Coordinator or their EMRS2 Network Associate for their District. States should not hesitate to reach out if they feel as if they are unprepared to use EMRS2 in an outbreak and need additional assistance. In addition, at any point during an outbreak, APHIS VS personnel are ready to assist States as requested.

Appendix A

Update on the EMRS2 Customer Permit Gateway

At this time, the EMRS2 Customer Permit Gateway is ready to register poultry producers, based on the recent HPAI outbreaks. Registration for other types of industries will occur in the near future.

There is no charge for registering or using the Gateway.

IF YOU ARE A PRODUCER WANTING ACCESS...

EAuthentication Level 1 credentials are required to access the EMRS2 Customer Permit Gateway. For more information on obtaining EAuthentication Level 1 access, please go to www.eauth.usda.gov. You will need to select “Create an Account” on the left side of the page if you do not have an account already.

In particular, if you are concerned about making movements during an outbreak, it is an excellent idea to ensure your premises is registered in EMRS2 with a PIN. This helps to accelerate not only response activities but the permitting process.

As a condition of using the Gateway, you must attest that you understand the requirements for testing and special conditions, and enter the accession numbers and results of any testing required for individual movements, prior to those movements, along with the date of the movement and amount of items moved.

At this time, requests to receive access to the Gateway will be prioritized to producers that have a potentially high volume of permitted movements. After your EAuthentication Level 1 credential has been approved, please contact Dr. Fred Bourgeois (Fred.G.Bourgeois@aphis.usda.gov) to request an account. In this e-mail, you need to include the following information:

- ◆ First name, middle initial, last name
- ◆ Title
- ◆ E-mail address you used for your EAuthentication account (this MUST be the same e-mail)
- ◆ Company affiliation
- ◆ Complex affiliation (e.g., for poultry premises where the complex has a specific affiliation in addition to a company affiliation).

ONCE YOU GAIN ACCESS...

Producers can click on their profile (Figure A-1) to see the premises that they are able to access. These are the premises for which you can request permits; it also allows you to see permits approved for these premises in the gateway.

Figure A-1. User Profile in the Gateway

The screenshot shows the 'EMRS Customer Gateway' interface. On the left is a navigation menu with options: Profile, Premises Access Requests, Address Book, Permit Requests, Permits, and Log Off. The main content area is titled 'User Profile' and is split into two panels. The left panel, 'User Profile', includes a note 'All fields marked with * are required.' and form fields for Salutation (with a dropdown menu), First Name, Last Name, Suffix, and Job Title. The right panel, 'Approved Premises', has tabs for 'Destination Premises' and 'Origin Premises'. Below these tabs is a table with columns for Name, Address, and Account... (partially visible).

As seen in Figure A-1, the menu on the left allows you to navigate from your profile, to premises access requests (for other premises you manage), to the address book, and to the location where permit requests can be made.

Clicking on the premises access requests will show the status of your requests for accounts (corporate or network) or individual premises. You can request access for new premises or accounts here; when you first sign up, you will already have access to premises that have been created in EMRS2 that are associated with your account (Figure A-2).

Figure A-2. Premises Access Requests

The screenshot shows the 'EMRS Customer Gateway' interface. On the left is a navigation menu with options: Profile, Premises Access Requests, Address Book, Permit Requests, Permits, and Log Off. The main content area is titled 'Premises Access Requests' and features a 'Create New Request' button. Below the button is a table with the following data:

Request ID	Request Type	Role Type	Premises/Account...	City	State	Requested	Status
GR-1001-16	Account	Permit Origin	MS	04/11/2016	Approved
GR-1002-16	Account	Permit Destination	MS	04/12/2016	Approved

IF YOU ARE A STATE THAT USES EMRS2, AND ARE WONDERING HOW THIS CHANGES YOUR PERMITTING PROCESSES...

The EMRS2 Customer Permit Gateway is intended to reduce data-entry time and improve the efficiency of the permitting process. Encourage producers in your State, particularly those that may have a high volume of movements in an outbreak, to ensure their premises is in EMRS2 (has a national premises ID) and that they are registered in the Gateway.

During an outbreak, producers can submit permit requests directly through the Gateway instead of contacting State staff. Additionally, they can enter the required permit request information directly into the Gateway, so State(s) only have to review the data entered to (1) ensure it is complete, and (2) ensure the request is appropriate. This data, when entered into the Gateway, is also directly entered into EMRS2.

In other words, for the State(s) that use EMRS2 to permit, the Gateway eliminates 2 steps from the plate of State personnel and automates the process. It also helps with transparency—instead of producers calling and asking about the status of their permit, they can go into the Gateway and see the status of each permit request.

IF YOU HAVE FEEDBACK ON THE GATEWAY...

Please let the EMRS2 National Coordinator or an EMRS2 Staff Specialist know! The Gateway has been thoroughly pilot tested with States that use EMRS2 as well as large poultry producers, but additional functionality may be considered and bugs should always be reported. The purpose of the Gateway is to make permitting easier, not harder, so feedback is always appreciated.

Appendix B

Abbreviations

APHIS	Animal and Plant Health Inspection Service
CEAH	Center for Epidemiology and Animal Health
COB	continuity of business
EMRS2	Emergency Management Response System 2.0
FAD	foreign animal disease
FAD PReP	Foreign Animal Disease Preparedness and Response Plan
FMD	foot-and-mouth disease
HPAI	highly pathogenic avian influenza
ICG	Incident Coordination Group
NAHEMS	National Animal Health Emergency Management System
NIMT	National Incident Management Team
NPIC	National Preparedness and Incident Coordination
PIN	premises identification number
QA	quality assurance
QC	quality control
QMC	quarantine and movement control
SFS	Secure Food Supply
USDA	U.S. Department of Agriculture
VS	Veterinary Services