



Animal and Plant  
Health Inspection  
Service

Animal Care  
4700 River Road  
Riverdale, MD 20737

August 17, 2018

Dear Management of Horse Shows, Exhibitions, Sales, and Auctions (Management), Horse Industry Organizations and Associations (HIOs), Designated Qualified Persons (DQPs); and Owners, Trainers, Exhibitors, Custodians, and Protection Act (HPA) Covered Activities:

I hope this message finds you well and looking forward to end of season events. I would like to provide you with two updates. First, I want to provide you with a progress report on our goal of ensuring HIO-licensed DQPs perform consistent HPA compliance inspections regardless of whether the U.S. Department of Agriculture (USDA) attends the event. Second, I want to provide you with a few reminders to prevent HPA noncompliances.

To begin, we are sharing the [HIO Summary Inspection Data](#) that tracks inspections by HIO-licensed DQPs from October 1, through June 30. This summary compares the HIOs' performance when USDA is and is not present at HPA-regulated events. Although there is some progress, it is marginal, at best, for nearly all HIOs that inspect horses wearing pads and/or action devices in competition. Given USDA's investment in joint training for USDA Veterinary Medical Officers and industry-licensed DQPs, and our efforts to work side-by-side with DQPs at HPA-covered events to provide on-the-spot feedback to strengthen performance, I expect more than marginal progress from USDA-certified HIOs. I remain gravely concerned about HIOs inspecting padded horses that detect very few HPA noncompliances when USDA is not present, and, nevertheless, are seemingly able to detect some measure of HPA noncompliance when USDA is present. HIOs are intended to partner with USDA in achieving the HPA's dual purposes of ending soring and promoting fair competition. HIOs that only perform their duties when USDA is present undermine these dual purposes, erode confidence in the Horse Protection program and walking horse industry, and will receive further individualized follow-up from USDA.

Next, as we enter the last portion of the season, I would like to remind you of the [guidance](#) I have provided throughout this season involving scar rule and equipment noncompliances.

- **Scar Rule.** With respect to assessing compliance with the scar rule, under our inspection focus when USDA or DQPs evaluate the posterior aspect of the pastern (the backside) they consider whether there is: (1) tissue that is non-pliable, with hard ridges or nodules with distinct edges that do not flatten, that is (2) accompanied by generalized or multiple discrete areas of hairloss. The assessment for the anterior (front) and anterior medial and lateral (sides) of the pastern is different. When USDA and DQPs assess these areas, they should be free of **any** tissue that is non-pliable, with hard ridges or nodules with distinct edges, that is indicative of soring. At times during pre-show inspections USDA has identified horses that appear to

have substances on their pasterns to camouflage tissue changes. When USDA asked these horses to return for post-show inspection, the scar rule noncompliance was easily identified by both USDA and the DQPs. A horse should not require camouflaging to demonstrate compliance with the scar rule during pre-show inspection, and the HPA [prohibits the use of substances](#), other than certain lubricates show management makes available **after** pre-show inspection. Throughout the season USDA has selected a sampling of horses for post-show inspection, and will continue to do so moving forward.

- **Equipment.** This year, USDA heavily invested in learning opportunities aimed at promoting full compliance with the HPA's equipment prohibitions by participating in two open clinics for trainers, exhibitors, and owners, and issuing guidance. Even so, both USDA and DQPs continue to identify equipment noncompliances (such as high bands, rough/heavy chains, and shoeing issues involving the 50% Rule and Heel/Toe ratio). These noncompliances are careless and 100% preventable. I strongly encourage trainers to proactively develop a process to **double check** all equipment prior to presenting a horse for inspection. Do not wait until you are at the show to think about how you will prevent equipment noncompliance.

As we enter the final stretch of the show season, I look forward to seeing improved performance from all industry participants and HIOs so together we can achieve the HPA's dual purposes of ending soring and promoting fair competition.

Very truly,

*Bernadette Juarez*  
Deputy Administrator  
Animal Care