

# 2019 USDA Review of Montana's Brucellosis Management Program

## Montana Response

### Review Objectives:

- Review the adequacy of the State's brucellosis rules and infrastructure to prevent the spread of brucellosis beyond the DSA.
- Assess the enforcement of brucellosis rules.
- Assess cattle surveillance, diagnostics/laboratory capability, and producer education and cooperation.
- Assess wildlife surveillance and risk mitigation activities.
- Evaluate DSA boundaries, testing, and movement restrictions for overall effectiveness.

### USDA review team key recommendations and MDOL responses:

1. *Continue the State's financial reimbursement for testing and vaccination to veterinarians and producers. Reimbursement rates may need updating.*

**Response:** Thank you for these recommendations. We agree that the testing reimbursement to veterinarians and producers is important to maintain the high compliance rate that Montana has seen over the years. As stated by the review team, "Future program success will most likely depend on continued State/Federal financial support". With the support of USDA and the Montana Legislature, Montana has been able to maintain reimbursement amounts at the same level since the inception of the Designated Surveillance Area.

The review document notes that, "The loss of RAP antigen production at NVSL will require federal support for any changes associated with the loss of the RAP antigen in the standard brucellosis testing protocol." The Montana Veterinary Diagnostic Laboratory (MVDL) has transitioned to the FPA for screening samples. Unfortunately, the cost of materials per test for the FPA is more expensive (\$0.82 per test) than the RAP test which USDA historically subsidized by supplying expendable products needed to run the test. For that reason, MDOL is requesting ongoing funding to offset the additional cost of the FPA test.

We appreciate the USDA recommendation to update and reflect rising costs to veterinarians over the years. MDOL has recently changed the policy outlining reimbursement amounts and procedures. This change resulted in a small increase in the net reimbursement amount for veterinarians.

2. *Develop a better system to monitor testing compliance associated with animal movements than the annual retrospective method. Try to achieve more real-time compliance by:*
  - a. *Funding electronic brand inspection forms/software for real-time database downloads of work accomplished, or*
  - b. *Conducting compliance evaluations on a more frequent basis than annually, or*
  - c. *Add another FTE to enter brand inspection and vaccination data into the database.*

**Response:** As mentioned in the review, overall producer compliance [with DSA regulations] is excellent. Regardless, MDOL continues to work towards compliance monitoring as frequently as possible. The brucellosis program compliance technician does confirm on a weekly basis (and sometimes more often) that all test eligible DSA cattle are tested at markets. For cattle sold or moved outside of market channels, confirmation of compliance does not occur as often due to the delay associated with receipt of paper brand inspections. The Brands Enforcement Division has prioritized data input of field inspections from DSA counties in order to assess compliance quickly.

The annual compliance assessment is the cumulative report of these frequent assessments which we intend to be finalized shortly after the end of each fiscal year.

In the review, USDA stated that Montana may need immediate financial support for a full-time employee to enter vaccination records. Historically, the Montana USDA office entered vaccination certificate data. Recently, MDOL took over entry of vaccination records. Montana will include a request for financial support for data entry personnel in the next cooperative agreement cycle.

3. *APHIS and MDOL should finalize and sign a Memorandum of Understanding (MOU) to include a brucellosis management plan (BMP) as soon as possible to come under full compliance with title 9, Code of Federal Regulations (9 CFR), part 78. APHIS has not pushed for a signature until completing this review.*

**Response:** Montana submitted the MOU to USDA for review and signing in February of 2019. MDOL recently received the USDA version following their review. MDOL and MTFWP have signed the document and it has been submitted to USDA.

4. *USDA should prioritize Montana DSA tag orders to ensure adequate numbers of tags available for program implementation.*

**Response:** EID tags have been used for many years for epidemiologic investigations. Tags have historically been supplied by USDA for these investigations at no charge. Electronic Identification (EID) tags are also utilized by many DSA producers and have simplified and even incentivized herd testing.

An important aspect of the brucellosis program in Montana is the requirement that all sexually intact animals regardless of age must be officially individually identified prior to leaving the DSA. MDOL would appreciate any financial or technology support that USDA could provide to help producers comply with this traceability requirement.

5. *Idaho and Wyoming DSA brands and/or producers should be loaded onto Archer electronic database system for hand-held devices used at markets to ensure DSA cattle identification.*

**Response:** The three GYA states will investigate to determine if sharing of DSA producer information could occur under current Montana, Wyoming and Idaho law. That said, each state

has regulations that ensure DSA cattle are identified and tested. Wyoming requires that all cattle from their DSA or Brucellosis Area of Concern (BAC) obtain a brand inspection prior to leaving the State. Wyoming DSA and BAC cattle brand certificates are marked as such and are, therefore, recognized and tested at Montana markets upon arrival. If cattle arrive without a brand inspection, then Montana has directed our markets to treat them as DSA cattle. Per Montana rule, movement of untested Montana DSA cattle to an out of state market is not allowed. Montana DSA cattle must be tested prior to leaving the DSA unless they are moving to an approved Montana market where they will be tested. Idaho's requirements are similar to Montana's. Idaho DSA cattle must be tested prior to leaving the State or they can be moved directly to slaughter or an Idaho market where testing will occur. Idaho also requires a brand inspection on all cattle leaving the State.

In addition to State regulations, differences in database technology between the States and the need to constantly update information due to changes in DSA producer information, complicates sharing of DSA producer data.

6. *Request VS or State support for implementing the use of Mobile Information Management (MIM) for auction-market testing and vaccinating.*

**Response:** VS and MDOL support the use of MIM software at auction markets for testing. However, other software is currently in use at some Montana markets. MDOL does not prioritize or recommend a single software but rather allows the veterinarian at each market to determine which software to utilize, as long as it meets minimum standards. MDOL does encourage market veterinarians to utilize software that can create electronic test charts. MIM software would be more likely to be adopted if updated by USDA to allow for easier manipulation of data collected in the field. MIMS limitations with newer versions of Windows software also reduces adoption.

Montana does not recommend adult vaccination at markets due to the 21 day slaughter withdrawal period, and possible abortion of pregnant cattle with subsequent financial and public health concerns. Additionally, we discourage vaccination of young females at the market because the stress level of heifer calves at the market with an RB51 vaccination can be detrimental to the health of the animal. Rather, animals are required to be vaccinated prior to arrival at the market. Electronic vaccination certificates are encouraged and made available to all Montana veterinarians.

7. *Reconcile FSIS and Montana State slaughter collection regulations for both State and Federal inspectors to minimize confusion.*

**Response:** We agree with the assessment that USDA-FSIS should collect samples on sexually intact animals 12 months of age and older as Montana facilities do. However, the State of Montana does not have authority over USDA-FSIS or its employees. Montana welcomes the opportunity to support USDA-VS in making a request to lower the age for brucellosis testing at federally inspected facilities in our State.

8. *Continue the current level of cattle surveillance, compliance monitoring, laboratory efficiency, customer service, and producer education for the brucellosis program.*

**Response:** Thank you, MDOL agrees with this recommendation and strives to maintain a vigorous and efficient brucellosis program.

9. *MFWP should continue to maintain and broaden its excellent relationship with MDOL and continue using USDA cooperative agreement funds to sample and capture 150 elk per year on the outer edges of the DSA to evaluate the DSA borders.*

**Response:** Thank you, MDOL plans to continue the live elk capture sampling program with the continued financial support of USDA through the annual cooperative agreement. However, it is important to note that MFWP with funding in part from the MDOL USDA-APHIS cooperative agreement, historically captured and tested 100 elk each year. In 2018, 150 elk were captured. Fifty of those animals were part of a MFWP project to monitor the movements of a herd of elk within the DSA. With the end of the 5-year elk capture study last year, costs have decreased which has allowed for an increased capture number. In 2020 MFWP will capture a total of 150 elk with plans to capture the same number in 2021.

10. *Continue to encourage herds to “whole herd test in the fall” to motivate DSA herds to take control of their own annual surveillance testing and have more DSA animals tested than with just pre-movement testing.*

**Response:** Thank you. MDOL agrees. Annual herd testing helps protect producers by:

- Minimizing the spread of disease within a herd through early discovery;
- Minimizing the impact of epidemiologic investigations; and
- Potentially allowing producers to avoid quarantines during the grazing season, by finding the presence of the disease early.

Additionally, the opportune time for collecting samples for a whole herd is in the fall when animals are already being handled for pregnancy checking and may prevent required handling for testing at inconvenient times of the year.

Unfortunately, the move to FPA for screening following the loss of the RAP test resulted in multiple false positives which negatively impacted numerous Montana’s DSA producers. Initially, a lack of an interpretation and testing protocol caused a disruption in business for producers. This may reduce voluntary participation in the future.

11. *Continue to collaborate with other GYA States to keep programs similar and transparent.*

**Response:** Montana has maintained a healthy relationship with our GYA partners and will continue to collaborate with them to maintain similar programs. No one program is perfect and therefore, if another GYA state’s approach proves to be more effective, Montana is willing to modify our program to incorporate changes reflecting Wyoming or Idaho’s programs.

MDOL sincerely thanks USDA for a thorough review of Montana’s Brucellosis Management Program.