The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of any individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs). Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, SW., Washington, DC 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

The opinions expressed by individuals in this report do not necessarily represent the policies of the U.S. Department of Agriculture.
Contents

Figures  LOF-1
Tables    LOT-1
Introduction  I-1
Required Inspection Procedures  2-1
General Inspection Procedures  3-1
Specific Types of Inspections  4-1
Record-keeping  5-1
Veterinary Care Requirements for Licensees  6-1
Research Facility Inspection–IACUC Requirements and Protocols  7-1
Confiscation Information  8-1
Appendix A—Forms and Worksheets  A-1
Appendix B—Direct Noncompliance Item (NCI) Guidance  B-1
Appendix C—Equipment and Supplies  C-1
Appendix D—Body Condition Charts  D-1
Glossary  Glossary-1
Index     Index-1
List of Graphics and Pictures

Figure 1-1 Adobe Maximize, Minimize, and Close Buttons 1-8
Figure 1-2 Adobe PDF Work Area 1-9
Figure 1-3 Adobe Menu Bar 1-9
Figure 1-4 Adobe Tool Bar 1-10
Figure 1-5 Navigation Bar Bookmarks 1-11
Figure 4-1 Maximum Volume for Single Sampling for Various Species (page 1 of 2) 4-20
Figure 4-2 Maximum Volume for Single Sampling for Various Species (page 2 of 2) 4-21
Figure 8-1 Emaciated Asian Elephant 8-4
Figure 8-2 Emaciated Lion 8-5
Figure 8-3 Thin Tiger with Chronic Poor Hair Coat 8-5
Figure 8-4 Emaciated Dog, Dorsal View 8-6
Figure 8-5 Chronic Untreated Eye Problems 8-6
Figure 8-6 Eye Problems 8-7
Figure 8-7 Serious Untreated Tail Injury of Cougar 8-7
Figure 8-8 Ruptured Abscess on Dog 8-7
Figure 8-9 Bloody Feces 8-8
Figure 8-10 Dead Dog in Enclosure 8-8
Figure 8-11 Overgrown Hooves 8-8
Figure 8-12 Mutilated Front Leg of Dog 8-9
Figure 8-13 Untreated Skin Problems 8-9
Figure 8-14 Chained With No Access to Shade 8-10
Figure 8-15 Inadequate Sized Shelter for Four Wolves 8-10
Figure 8-16 Shelter Not Structurally Sound 8-11
Figure 8-17 No Bedding, Rusted Enclosure 8-11
Figure 8-18 Dogs With No Shelter or Shade 8-11
Figure 8-19 Dogs With No Shade 8-12
Figure 8-20 Poor Quality Rotting Chicken 8-13
Figure 8-21 Rotting Carcass in Cougar Enclosure 8-13
Figure 8-22 Poor Quality Chicken and Meat 8-14
Figure 8-23 Self Feeder with Moldy Food 8-14
Figure 8-24 Mouse Feces in Feeder 8-14
Figure 8-25 Filthy Water Receptacle 8-15
Figure 8-26 Grossly Inadequate Space 8-15
Figure 8-27 Extremely Soiled, Overcrowded Hamster Enclosure 8-16
Figure 8-28 Extremely Soiled Rabbit Enclosure 8-16
Figure 8-29 Excessive Accumulation of Feces in Trays Under Dog Run 8-16
Figure 8-30 Layers of Moist, Filthy Bedding 8-17
Figures
List of Forms and Worksheets

Figure 8-31 View from Front of Cougar 8-18
Figure 8-32 Side View (Lateral) of Cougar 8-18
Figure 8-33 Dorsal View of Cougar 8-19
Figure 8-34 Sheep Suffering from Unshorn Coat in Hot Weather 8-21
Figure 8-35 Overgrown Hooves 8-21
Figure 8-36 Guinea Pigs in Filthy Enclosure 8-22
Figure 8-37 Filth in an Animal Enclosure 8-22
Figure 8-38 Milk and Cottage Cheese in Pig Trough that is Never Cleaned 8-23
Figure 8-39 Evidence of Inadequate Water (Dry Bucket) 8-23
Figure 8-40 Notice of Intent to Confiscate Animals 8-30
Figure 8-41 Notice of Confiscation of Animals 8-31
Figure D-1 Cat Body Assessment Chart D-3
Figure D-2 Cougar Body Assessment Chart D-4
Figure D-3 Dog Body Assessment Chart D-5
Figure D-4 Elephant Body Assessment Chart D-6
Figure D-5 Leopard Body Assessment Chart D-7
Figure D-6 Lion Body Assessment Chart D-8
Figure D-7 Tiger Body Assessment Chart D-9

List of Forms and Worksheets

Figure 7-1 Holding Period Regulations Summary Chart 7-56
Figure 7-2 Research Facility Protocol Selection Worksheet 7-57
Figure A-1 APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers (1 of 4) A-2
Figure A-2 APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers (2 of 4) A-3
Figure A-3 APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers (3 of 4) A-4
Figure A-4 APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers (4 of 4) A-5
Figure A-5 APHIS Form 7003A–Application for New License A-6
Figure A-6 APHIS Form 7003–Application for License Renewal A-7
Figure A-7 APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand (front) A-8
Figure A-8 APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand (reverse) A-9
Figure A-9 APHIS Form 7006–Record of Disposition of Dogs and Cats (front) A-10
Figure A-10 APHIS Form 7006–Record of Disposition of Dogs and Cats (reverse) A-11
Figure A-11 APHIS Form 7006A–Continuation Sheet for Record of Disposition of Dogs and Cats A-12
Figure A-12 APHIS Form 7011–Application for Registration Update A-13
Figure A-13 APHIS Form 7011A–Application for New Registration A-14
Figure A-14 APHIS Form 7019–Record of Animals on Hand (Other than Dogs and Cats) A-15
Figure A-15 APHIS Form 7020–Record of Acquisition, Disposition or Trans-
List of Forms and Worksheets

Figure A-16  APHIS Form 7020A–Continuation Sheet for Record of Acquisition, Disposition or Transport of Animals (Other than Dogs and Cats)  A-16
Figure A-17  APHIS Form 7023-Annual Report of Research Facility  A-18
Figure A-18  USDA, APHIS, Animal Care Animal Welfare Complaint Sheet  A-19
Figure A-19  USDA, APHIS, Animal Care Search for Unlicensed Activity Worksheet  A-20
Figure A-20  Amended Report Letter  A-23
Figure A-21  Environmental Enrichment Plan Checklist (page 1 of 2)  A-24
Figure A-22  Environmental Enrichment Plan Checklist (2 of 2)  A-25
Figure A-23  Handling of Dangerous Animals Letter (1 of 2)  A-26
Figure A-24  Handling of Dangerous Animals Letter (2 of 2)  A-27
Figure A-25  Inspection Report Review Checklist (page 1 of 2)  A-28
Figure A-26  Inspection Report Review Checklist (page 2 of 2)  A-29
Figure A-27  Options for Identification of Dogs and Cats  A-30
Figure A-28  Perimeter Fence Variance Request Letter (1 of 2)  A-31
Figure A-29  Perimeter Fence Variance Request Letter (2 of 2)  A-32
Figure A-30  State and Territory Identification Codes  A-33
Figure A-31  Teachable Moments Review Checklist (page 1 of 2)  A-34
Figure A-32  Teachable Moments Review Checklist (page 2 of 2)  A-35
Figures
List of Forms and Worksheets
Table 1-1  How to Use Decision Tables  1-5
Table 1-2  Where to Report Questions or Concerns With the Inspection Guide  1-7
Table 3-1  Biosafety Measures When Conducting an Inspection  3-5
Table 4-1  Action to Take on a Complaint  4-16
Table 4-2  Traveling Petting Zoo Itinerary Guidance  4-35
Table 4-3  Holding Period for Dogs and Cats Held by Random Source Class B Dealers  4-38
Table 6-1  Signs of Pain and/or Distress  6-17
Table 7-1  Species-Typical Signs of Pain  7-38
Table B-1  Direct Noncompliance Item Guidance  B-2
Table D-1  Generic Bengal Tiger Cub Weights  D-10
Chapter 1

Introduction

Contents

Purpose 1-2
Philosophy 1-2
Scope 1-2
Disclaimer 1-2
Meaning of Should, May, and Must 1-2
Conventions 1-3
   Advisories 1-3
   Boldface 1-4
   Bullets 1-4
   Chapters 1-4
   Contents 1-5
   Control Data 1-5
   Decision Tables 1-5
   Examples 1-5
   Footnotes 1-5
   Heading Levels 1-6
   Hyperlinks to Tables, Figures, and Headings 1-6
   Italics 1-6
   Numbering Scheme 1-7
   Transmittal Number 1-7
Using the Inspection Guide 1-7
   Reporting Questions or Concerns With the Inspection Guide 1-7
   Inspection Guide Updates 1-8
   Ordering Additional Inspection Guides and Revisions 1-8
Navigating Adobe® PDF Documents 1-8
   The Menu Bar 1-9
   The Tool Bar 1-10
   Navigation Bar with Bookmarks 1-11
   Document Pane 1-12
   Navigating the PDF Document 1-12
Introduction
Purpose

Purpose

The purpose of the Animal Welfare Inspection Guide is to provide an aid for APHIS Animal Care personnel when inspecting USDA licensed and registered facilities.

The Inspection Guide is not a regulation and does not rise to the level of policy. It serves as a tool to improve the quality and uniformity of inspections, documentation, and enforcement of the Animal Care Program.

Philosophy

The Inspection Guide is designed to facilitate the decision-making process. It cannot, nor is it intended to, replace the inspector’s professional judgment.

Scope

The Inspection Guide summarizes current regulatory and procedural criteria for USDA licensed/registered facilities, and provides examples of inspection processes for verifying compliance. It does not add to, delete from, or change current regulatory requirements or standards.

Disclaimer

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, the AC Policy Manual, the Required Inspection Procedures, standard procedures, or the inspector’s professional judgment. All inspection decisions must be justified by applicable sections of the regulations and standards.

Meaning of Should, May, and Must

The words “should,” “may,” and “must” are used throughout the Guide as follows:

- **May** is used when the referenced action(s) is optional
- **Must** is used when the referenced action is required by an Animal Care procedure or by the 9 CFR regulations/standards
- **Should** is used when the referenced action(s) is:
  - Directed by Animal Care Management;
Strongly recommended, but not specifically required by an Animal Care procedure, or

Strongly recommended, but not specifically required by the Title 9 Code of Federal Regulations (CFR) regulations/standards

Conventions

These conventions are established by custom and are widely recognized and accepted within the USDA. Standard Manuals Unit (MU) language is described in the following pages.

Advisories

Advisories are used throughout MU manuals to bring important information to the user’s attention. Please carefully review each advisory. The definitions coincide with the American National Standards Institute (ANSI) with the goal of making the warnings easy to recognize and understand, thus limiting the human and dollar cost of foreseeable errors and accidents,¹ and are in the format shown below.

<table>
<thead>
<tr>
<th>CAUTION</th>
<th>Caution Table message is used for tasks involving minor to moderate risk of injury.</th>
</tr>
</thead>
<tbody>
<tr>
<td>DANGER</td>
<td>Danger Table message is used in the event of imminent risk of death or serious injury.</td>
</tr>
<tr>
<td>NOTICE</td>
<td>Notice Table message is used to alert a reader of important information or Agency policy.</td>
</tr>
<tr>
<td>SAFETY</td>
<td>Safety Table message is used for general instructions or reminders related to safety.</td>
</tr>
<tr>
<td>WARNING</td>
<td>Warning Table message is used in the event of possible risk of serious injury.</td>
</tr>
</tbody>
</table>

¹ TCIF Guideline, Admonishments (Safety-Related Warning Message), TCIF-99-021 Issue 1, p.4
**Boldface**
Boldface type is used to emphasize important words throughout this Inspection Guide. These words include, but are not limited to: **cannot, do not, does not, except, lacks, must, neither, never, nor, not, only, other than.**

**Bullets**
Bulleted lists indicate that there is no order of priority to the information being listed. Bulleted lists should always be in alphabetical order.

**Change Bar**
A black change bar in the left margin is used to indicate a change appearing on a revised page.

**Chapters**
This Inspection Guide is organized by chapters and appendixes. The chapters contain main topics for Animal Care inspection procedures. The appendixes contain information that is “not essential part of the text but are helpful to a reader seeking further clarification, texts of documents, long lists, survey questionnaires, or sometimes even charts or tables.”

- Chapter 1: **Introduction** on page 1-1
- Chapter 2: **Required Inspection Procedures** on page 2-1
- Chapter 3: **General Inspection Procedures** on page 3-1
- Chapter 4: **Specific Types of Inspections** on page 4-1
- Chapter 5: **Record-keeping** on page 5-1
- Chapter 6: **Veterinary Care Requirements for Licensees** on page 6-1
- Chapter 7: **Research Facility Inspection–IACUC Requirements and Protocols** on page 7-1
- Chapter 8: **Confiscation Information** on page 8-1
- Appendix A: **Appendix A—Forms and Worksheets** on page A-1
- Appendix B: **Appendix B—Direct Noncompliance Item (NCI) Guidance** on page B-1
- Appendix C: **Appendix C—Equipment and Supplies** on page C-1
- Appendix D: **Appendix D—Body Condition Charts** on page D-1
- Glossary on page Glossary-1
- Index on page Index-1

---

**Contents**
Every chapter has a table of contents (mini-TOC) listing only the first- and second-level headings within the chapter.

**Control Data**
Control data is located at the top and bottom of each page to help users keep track of where they are in the Inspection Guide and to be aware of updates to specific chapters, appendixes, etc. At the top of each page is the chapter title and first-level heading for that page. At the bottom of each page is the transmittal number (month/year/issue or edition number), document title, and page number.

**Decision Tables**
Decision tables are used throughout the Inspection Guide. The first and middle columns in each table represent conditions, and the last column represents the action to be taken after all conditions listed for that row are considered. Begin with the column headings and move left to right, and if the condition does not apply, then continue one row at a time until you find the condition that does apply (Table 1-1).

<table>
<thead>
<tr>
<th>If you:</th>
<th>And if the condition applies:</th>
<th>Then:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Read this column cell and row first</td>
<td>Continue in this cell</td>
<td>TAKE the action listed in this cell</td>
</tr>
<tr>
<td>Find the previous condition did not apply, then read this column cell</td>
<td>Continue in this cell</td>
<td>TAKE the action listed in this cell</td>
</tr>
</tbody>
</table>

**Examples**
Examples are used to clarify a point by applying it to a real-world situation. Examples always appear in a box as a means of visually separating them from the other information contained on the page.

**Footnotes**
Footnotes comment on or cite a reference to text and are referenced by number. The footnotes used in this Inspection Guide include general text footnotes, figure footnotes, and table footnotes.
General text footnotes are located at the bottom of the page after a thin green line half the width of the page and flow numerically throughout a chapter.

When space allows, figure and table footnotes are located directly below the associated figure or table. However, multi-page tables or tables covering the entire length of a page cannot accommodate footnote numbers and footnote text on the same page. If a table continues beyond one page, the associated footnotes will appear on the page following the end of the table.

**Heading Levels**
Within each chapter there are four heading levels. The first-level heading is indicated by a horizontal line across both the left and right columns with the heading language across the left and right columns directly underneath. The body text after a first-level heading is located inside the margined text area, one line after the heading language. The second- and third-level headings are inside the margined text area with the body of text following underneath. The fourth-level heading is inside the margined text area followed by a period and leading into the text. Refer to the “Example” box to see how the headings appear in the text.

**EXAMPLE**

<table>
<thead>
<tr>
<th>First-level heading</th>
</tr>
</thead>
<tbody>
<tr>
<td>Text</td>
</tr>
<tr>
<td>Second-level heading</td>
</tr>
<tr>
<td>Text</td>
</tr>
<tr>
<td>Third-level heading</td>
</tr>
<tr>
<td>Text</td>
</tr>
</tbody>
</table>

*Fourth-level heading.* Text

**Hyperlinks to Tables, Figures, and Headings**
Figures, headings, and tables are cross-referenced in the body of the Inspection Guide and are in hypertext (blue) font.

**EXAMPLE** See Reporting Questions or Concerns With the Inspection Guide to determine where to report problems with the Inspection Guide.

**Italics**
The following items are italicized throughout the Inspection Guide.

- Cross-references to headings and figure/table titles
Introduction
Using the Inspection Guide

- Publication names
- Scientific names

Numbering Scheme
A two-level numbering scheme is used in this Inspection Guide for pages, tables, and figures. In two-level numbering the first number represents the chapter and the second number represents the page, table, or figure number. Dashes are used in page numbering to differentiate page numbers from decimal points.

Transmittal Number
The transmittal number contains the month, year, and a consecutively issued number (beginning with -01 for the first edition and increasing consecutively for each update to the volume or chapter). The transmittal number is only changed when the volume or chapter is updated. If no changes are made to a specific volume or chapter, the transmittal number for that volume or chapter remains unchanged. The transmittal number only changes for the entire Inspection Guide when a new edition is issued or changes are made to the entire document.

EXAMPLE
10/2012-01 is the transmittal number for this update and is located in the control data in the footer area of the pages in this volume.

10 is the month the update was issued.
2012 is the year the update was issued.
01 is the edition number (the original edition).

Using the Inspection Guide
Review the contents of the Inspection Guide to get a feel for the scope of covered material. Use the table of contents in each chapter (mini TOC) to find the needed information. If the table of contents is not specific enough, turn to the index to find the topic and corresponding page number.

Reporting Questions or Concerns With the Inspection Guide
Use Table 1-2 to determine where to report questions or concerns with this Inspection Guide.

Table 1-2 Where to Report Questions or Concerns With the Inspection Guide

<table>
<thead>
<tr>
<th>If you:</th>
<th>Then:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are not able to access the online Inspection Guide</td>
<td>CONTACT Josie Cooley via email or at 240-529-0358</td>
</tr>
<tr>
<td>Have a suggestion for improving the formatting of the content (design, layout, composition), grammar, or spelling</td>
<td>CONTACT Dr. Kay Carter-Corker via email or at 301-851-3751</td>
</tr>
</tbody>
</table>
Inspection Guide Updates
The Animal Care (AC) Unit issues and maintains this Inspection Guide electronically on the AC web site. The online manual contains the most up-to-date information.

Notification of revisions to the Inspection Guide are distributed via the APHIS Stakeholder Registry to anyone who has subscribed to receive Animal Care program updates. To subscribe to updates, register here.

Each update contains the following information:
◆ Link to access and download the online Inspection Guide
◆ List of the revised page numbers
◆ Purpose of the revision
◆ Transmittal number

Ordering Additional Inspection Guides and Revisions
Although using the online Inspection Guide is the preferred method, copies of this Inspection Guide on CD may be ordered from the AC Headquarters office in Riverdale, Maryland at 301-851-3751 or via email.

Navigating Adobe® PDF Documents
The Animal Welfare Inspection Guide is provided to the user as a portable document format (PDF) file type. Viewing PDF documents require Adobe® Reader software.

With the PDF document open, you can minimize, maximize, or close the document using one of the three buttons in the top right hand corner of the screen. (see Figure 1-1)

Figure 1-1 Adobe Maximize, Minimize, and Close Buttons

Refer to Figure 1-2 to identify the major parts of the document work area:
◆ The Menu Bar
◆ The Tool Bar
◆ Navigation Bar with Bookmarks
◆ Document Pane
The Menu Bar

The menu bar has selections for “File”, “Edit”, and “View” menus listed first. The File menu gives the user the ability to Save, Open, and Print the document. The Edit menu gives the user the ability to Undo, Copy, Paste, Select All, and Find. The View menu gives the user the ability to Zoom, Page Display, and Rotate View. (refer to Figure 1-3)
The Tool Bar
The Tool Bar can be customized to include:

1. File tool bar
   - Convert File to PDF
   - Open File
   - Save File
   - Print File
   - Share File as Email Attachment

2. Page Navigation tool bar
   - Shows previous and next page, Page x of xxx, Previous view, Next view

3. Select and Zoom tool bar
   - Zoom in and out on the page
   - Type zoom percentage of your choice or use the drop down menu

4. Page display tool bar
   - Fit to window width or fit to one full page

5. Find tool bar
   - Find text in the document

6. Read mode
   - View the document in read-only mode (To return to the main tool bar, press <Esc> or click ‘X’ on the bottom center of the document pane)

Refer to the diagram in Figure 1-4. Depending on your system settings, your tool bar may not look like the one in the example below.

Figure 1-4  Adobe Tool Bar
Navigation Bar with Bookmarks

The Navigation Bar is located on the left side of the page. Use it to navigate to specific places in the document. The bookmarks typically represent chapter titles within the document. Click on the bookmark icon beside the topic name to go to that topic in the document. Click on the [+ ] or [- ] key to expand or collapse the bookmark as needed. (Figure 1-5: B and C) Expanding the bookmark enables you to go to more detailed topics within the chapter.

To go to specific pages using thumbnail images or previews, click on the “Page Thumbnail” button. (Figure 1-5: A)

NOTICE

To GO BACK to the previous page in the document, press the <ALT> key together with the left arrow key.

Figure 1-5  Navigation Bar Bookmarks
**Document Pane**
The document pane displays the entire book. You can view the document in single or two page view. To change the viewing area, go to “View” in the Menu Bar, and select “Page Display”. You can also zoom in or out using the “View” menu.

**Navigating the PDF Document**
After you open a PDF document, there are several ways to navigate through the document. Refer to Figure 1-4 on page 1-10.

You can turn pages either by pressing the Page Up or Page Down keys on your keyboard, by clicking and dragging the vertical scroll bar in the far right area of the document pane, or by clicking the Previous Page or Next Page button.

To go to a specific page, press Shift-Ctrl-N, type the Adobe page number in the Go To Page dialog box, and then click OK. Refer to Area 2 in Figure 1-4.

**NOTICE**
To GO BACK to the previous page in the document, press the <ALT> key together with the left arrow key.

**Tables of Contents**
Each chapter in the book has a table of contents located on the first page. Click on the blue hyperlinks in the contents to go to a specific page.

**Searching for Information**
You can search the PDF document for key words or phrases. In the menu bar, select “Edit” and “Find” or press Ctrl-F and type in the word you are looking for. You can search on phrases using the Advanced Find feature from the “Edit” menu or by pressing Shift-Ctrl-F.

You can also use the Index located at the end of the book to look up specific topics.
Chapter 2

Required Inspection Procedures

Contents

Required Inspection Procedures 2-2
  General Requirements 2-2
Safety 2-3
  Inspector Safety 2-3
  Biosafety 2-3
Inspection Steps 2-3
Documenting Inspection Findings 2-4
  No Noncompliant Items (NCIs) Identified 2-4
  Problems Addressed by the Facility before Inspection 2-4
  Teachable Moments 2-5
  New NCIs Identified 2-7
  Repeat NCI 2-8
  Recurring/Chronic NCI 2-8
  “Critical” NCI Identified 2-9
  “Direct” NCI Identified 2-10
  “Veterinary Care Direct” NCI Identified 2-11
  ACI Team Inspection with a VMO After a Vet Care Direct 2-12
Exit Interview 2-12
  Signature on the Inspection Report 2-13
  Handwritten or “Word” Inspection Reports 2-13
  Delivery of the Inspection Report 2-14
  Airport Inspections 2-14
Inspection Photographs 2-15
Risk Based Inspection System (RBIS) 2-16
Deciding Not to Conduct an Inspection 2-16
Attempted Inspection 2-16
  Optimal Hours of Inspection 2-17
Prelicense Inspection 2-18
  Dealers 2-19
  Exhibitors 2-19
  Facility Not in Full Compliance 2-19
  Facility in Full Compliance 2-20
Required Inspection Procedures

The procedures set forth in this Chapter are procedures that must be followed by the inspector when conducting an inspection. If you, the inspector, are unsure of a required procedure, contact your Supervisory Animal Care Specialist (SACS). For more detailed general inspection procedures, refer to Chapter 3.

General Requirements

When conducting an inspection, the inspector must follow the general requirements listed below:

◆ Do not enter facilities with locked gates and/or “No Trespassing” signs unless you obtain prior approval from the facility.
◆ If you arrive at the facility and determine that it is not appropriate to conduct an inspection, refer to Deciding Not to Conduct an Inspection.
◆ If you do not find anyone at the facility, follow the Attempted Inspection procedure to complete an Attempted Inspection.
◆ Prior to notifying the facility of your presence, inspectors may observe and record findings without being accompanied by a facility representative at facilities that are open to the public. Identify yourself to the licensee immediately after the observation. Before documenting findings on an Inspection Report, the inspector must discuss the findings with a facility representative.
◆ You must be accompanied by the licensee, registrant, or the facility’s designated representative (who must be at least 18 years of age).
◆ Conduct a complete exit interview.
Safety

Inspector Safety
If you feel you are in imminent danger, promptly leave the area.

The licensee/registrant/applicant is responsible for ensuring the safety of the inspector during the inspection. If you feel at all unsafe, ask the licensee to correct the situation. If the licensee does anything you feel is unsafe, state that you will leave the facility immediately unless the situation is corrected.

Biosafety
In all situations, follow the facility’s visitor biosafety procedures, and/or put on recommended protective clothing, gear, and/or boots.

Inspectors must:
- Wear disposable shoe covers during dog kennel inspections.
- Wear disposable gloves if it is necessary to touch an animal at all facilities.
- Change gloves between animals or between enclosures.

For more specific biosafety procedures, see Biosafety Measures in Chapter 3 and the AC Safety & Health Manual.

Inspection Steps
Basic steps to follow in conducting an inspection of a facility include, but are not limited to:

- Review previous Inspection Reports with special attention to Veterinary Care and Direct Noncompliant Items (NCIs) and review previous Teachable Moments and animal inventories.
- Inspect the animals, premises, building(s), enclosures, equipment, and transportation vehicles/equipment for all pertinent requirements of the regulations and standards.
- Ensure that all primary enclosures can safely contain the animals.
- Review the facility’s program of veterinary care, husbandry practices, required records and, when appropriate, the “Exercise Plan for Dogs”, the “Plan for Environmental Enhancement” for nonhuman primates and the feeding plan for big cats to assure adequate nutrition.
- When possible, observe the animal handling techniques of facility personnel.
Consider problems that may occur at other times of the year.

NOTICE
Inspection steps are covered in detail in General Inspection Procedures Chapter 3.

Documenting Inspection Findings

Document inspection findings in the narrative section of the Inspection Report. Do not type any personal identifiable information (PII) or confidential or proprietary business information in the narrative of any Inspection Report, including addresses and phone numbers.

No Noncompliant Items (NCIs) Identified
If all items are in compliance, type the following statement on the Inspection Report: “No noncompliant items identified during this inspection.”

For inspections in response to an incident or complaint, further review may be needed to determine compliance. If you are uncertain whether a noncompliance was involved, do not write “no noncompliance.” After discussing your findings with your SACS, type the following stand-alone statement on the Inspection Report: “The (very brief description of the incident, e.g., lion attack) is under review.”

For Site Approval Inspections, type the following statement on the Inspection Report: “No noncompliant items identified during this inspection. This site is now approved for regulated activity.”

Problems Addressed by the Facility before Inspection
If you learn during the course of an inspection that the facility identified and corrected a problem in the past, do not write a citation if all of the following are true:

◆ The licensee/registrant found and corrected the problem in a timely manner
◆ The licensee/registrant took steps to prevent the problem from recurring
◆ There is not an ongoing pattern of noncompliances, and
◆ There were no serious animal welfare impacts associated with the problem

Cite the problem if:
◆ The problem was not discovered and/or corrected in a timely manner
◆ There is a regular pattern of ongoing AWA noncompliances
There were serious animal welfare impacts

Include a correction date or indicate that the problem has been corrected in the report.

**Teachable Moments**

Teachable moments are minor NCIs identified during an inspection that are not cited on an Inspection Report. Cite any noncompliance that impacts the health or well-being of an animal on the Inspection Report. If you identify an area that is not a noncompliant item, but you are concerned may become one in the future, discuss the concern with the licensee/registrant, but do **not** list it as a teachable moment.

The inspector should decide if each issue observed on inspection is (in this order):

1. **In compliance**
2. **In compliance**, but an area of concern or discussion topic. This is **not** a teachable moment or an NCI
3. A **teachable moment** that meets **all** the following criteria:
   - Is a minor NCI that is not impacting animal welfare; and
   - Is not likely to soon become a serious, Direct, or other Critical, or Repeat NCI; and
   - Is not a Direct or other Critical; and
   - The facility is willing and able to correct the issue quickly; and
   - Was not previously listed as a teachable moment or cited at the facility
4. An **NCI** that should be cited, includes but is not limited to any issue that:
   - Is noncompliant **and** does not meet the criteria to be a teachable moment
   - **Was previously cited or identified as a teachable moment at the facility**
   - Is a Direct or other **Critical**
   - Falls under a section of the regulations that is already being cited (for example, if you are already citing 3.10 Watering, then anything that falls under this standard would be cited and would not qualify as a teachable moment.)

**Use of Teachable Moments**

Teachable moments are **not** appropriate, and are **not** to be used:

- During prelicense or site addition inspection
◆ At any facility with a poor compliance record. For this facility, all NCIs must be documented on the Inspection Report. A poor compliance record generally includes facilities with:
  ❖ Directs or other Criticals, and/or multiple Repeats
  ❖ Facilities that have been cited for refusal of inspection or interference
  ❖ Facilities under investigation or with recent enforcement actions
  ❖ Facilities with open cases at OGC (there may be exceptions to this)

**NOTICE**

If you are planning to write up four or more teachable moments, contact your SACS to determine if these are all valid teachable moments.

**Special Considerations**

◆ On the first inspection after a license is issued, limit teachable moments to recordkeeping and identification issues.

◆ On the first inspection after registration, use of teachable moments is appropriate.

◆ Numerous teachable moments are a “red flag.” There should be prompt follow-up at these facilities to ensure that compliance is achieved. Therefore, they should be re-inspected within 90 days.

There may be exceptions to these criteria. If you are uncertain about the use of teachable moments at a facility, contact your SACS/SOTW.

**Documenting Teachable Moments**

The inspector must enter the Teachable Moments into the Teachable Moments screen in ACIS:

◆ Check the licensee/registrant’s name, customer ID, certificate number and site to make sure the information is correct.

◆ Enter the inspection date, section number of each teachable moment, and a brief description of the teachable moment.
Provide one copy to the licensee/registrant, and make a copy for your file or review in ACIS prior to the next inspection.

**New NCIs Identified**
If a new NCI(s) is identified, cite it in the Inspection Report narrative. The citation should include the following four parts:

1. The section number and most specific subsection letter/number of each noncompliance.
2. A clear, detailed description of the noncompliance including, when appropriate, the number of animals affected.
3. An explanation of why the item is a noncompliance and/or the impact it is having on the animals.
4. A correction deadline and a “general” description of what the licensee/registrant should do to correct the problem, and assure that it does not continue/recur. This description should not be worded in such a way that it could be interpreted that AC is mandating how an NCI is going to be corrected. A correction deadline should be appropriate to the severity of the NCI, and unless animal welfare will be put in jeopardy, be realistic as to what the facility can accomplish.

Use “Direct” or “Critical” NCI designation, if appropriate.

**NOTICE**
If a noncompliant item falls into more than one section or subsection, cite the noncompliance only in the most applicable section or subsection for each species affected.

---

**EXAMPLE**

Example Teachable Moment for 3.1(c):

**Not enough detail:** Dirty den boxes/carpet strings

**Too much detail:** Two pens in the Yorkie area in the top barn (#3 and 4) have mild staining around the den box opening and should be cleaned more frequently. In 2 pens in the whelping area, #6 and 8, housing 2 litters of poodles, there are carpet strings/excessive wear on 25% of each carpet. The owner did not want to disturb the new mother for the last couple days but has a plan to replace the whelping carpets with the pups tomorrow.

**Appropriate detail:** Two pens with staining at den box door (needs more frequent cleaning) & 2 whelping boxes with worn carpets need carpets replaced.
Repeat NCI
NCIs cited in the same section and subsection as on the last inspection or on the last full inspection if the previous inspection was a Focused Inspection should be designated as a “Repeat”. The “Repeat” designation may be also be used if the section and subsection have been cited as a Repeat citation multiple times within the last 3 years, even if it was not cited on the last full inspection. You are responsible for checking the NCI and designating as a “Repeat” if ACIS did not.

Remember: Do not include correction dates for Repeat NCIs.

Recurring/Chronic NCI
A recurring or chronic noncompliant item is the same or a similar noncompliance which is not found on consecutive inspections, i.e., it is cited on one inspection, corrected by the next inspection, then re-occurs on the third and/or a subsequent inspection.

The recurring noncompliance can be:
- A noncompliance of the same Section and subsection of the regulations or standards
- The same noncompliance with the same Section and subsection of the regulations or standards but identified for a different species
- The same or a similar noncompliance as cited earlier

Some factors to consider when deciding if the NCI is recurring or chronic include, but are not limited to:
- Have you discussed the development of an active program or system of maintenance with the licensee/registrant?
- Have you discussed the NCI with a person of higher authority at the facility?
- Have you noticed a pattern?
- How far back was the last time the NCI was cited?
- How many inspections have been conducted between the recurrences?
- What is the severity of the NCI?

Use your professional judgment in deciding what action to take, such as:
- Citing the NCI as a new noncompliant item

NOTICE
On Prelicense Inspections or New Site Approval inspections, NCIs should not be designated as a “Repeat”.

On Prelicense Inspections or New Site Approval inspections, NCIs should not be designated as a “Repeat”.
Required Inspection Procedures
Documenting Inspection Findings

◆ Citing the NCI as a Repeat NCI (Include in the description other inspection dates that this NCI has occurred)
◆ Discussing the NCI with your SACS

“Critical” NCI Identified
Critical NCIs are the following:

◆ Direct NCIs (see description below)
◆ A prior adverse event that had serious or severe animal welfare consequences to one or more animals, but poses no current risks to the animals. Examples include, but are not limited to:
   Actions or inactions of unqualified personnel resulting in documented, adverse effects on the health or well-being of an animal
   Escape of an animal resulting in adverse effects on the health or well-being of the animal (NOTE: this includes those situations when an animal is not recovered)
   Failure of an IACUC to meet and/or conduct facility and program reviews for a period of time equal to or greater than 1 year resulting in documented, adverse effects on the health or well-being of an animal
   Handling violation that resulted in death or serious injury to an animal
   Lack of an attending veterinarian with documented adverse effects on the health or well-being of an animal that require immediate veterinary care
   Studies involving more than momentary pain and distress to an animal that is conducted at research facilities without an approved protocol and without an appropriate response from the Institutional Animal Care and Use Committee (IACUC)
◆ Inspection refusals and situations where APHIS has been unable to inspect the facility for a significant amount of time due to chronic unavailability for inspections
◆ Records intentionally falsified to mislead APHIS or another government agency
◆ NCI resulting in an injury requiring immediate medical attention or death to a human
◆ Handling an animal in a manner that results in an animal attack or physical contact between an animal and a member of the public, depending on the circumstances, such as where the incident adversely affected the health or well-being of the animal, or the circumstances or practices that caused the incident posed a high risk to the animal and/or the human and could have led to serious injury or death to the animal and/or the human
- Interference with, threaten to abuse, or harass an APHIS official in the course of carrying out his or her duties
- Obtained an animal from any person who is required to be licensed but who does not hold a valid, and knew both 1) that the person the animal was obtained from does not hold a license, and 2) that the person was required to hold a license
- Knowingly obtaining random source dogs or cats from a prohibited source, or obtaining animals by use of false pretenses, misrepresentation, or deception
- Engaging in regulated activity with a suspended or revoked license

**“Direct” NCI Identified**

A “Direct” noncompliance is a Critical noncompliance that is currently (at the time of the inspection) having a serious or severe adverse effect on the health and well-being of the animal, or has the high potential to have that effect in the immediate future.

A prior adverse incident discovered during the inspection that had serious or severe animal welfare consequences and there are ongoing risks for the same serious or severe adverse effects at the time of the inspection should be marked as a “Direct”.

The severity of the NCI has no impact on whether an NCI should be marked as Critical or Direct; the determining factor is whether it has a current impact or has the potential to have that effect in the immediate future.

See Appendix B—Direct Noncompliance Item (NCI) Guidance on page B-1 for examples.

### NOTICE

On Prelicense Inspections, NCIs should not be designated as a “Direct”.

**Correction Date Guidelines:**

- If the “Direct” NCI was corrected at the time of the inspection, a correction date is not necessary.
- For an egregious Direct noncompliance, the correction date should be very short, e.g., 1 day, and the reinspection should occur within a short period of time after the correction date to verify the correction and ensure animal welfare.
- The correction deadline for a “Direct” noncompliance should never exceed 14 days.
Required Inspection Procedures
Documenting Inspection Findings

A complete or partial reinspection of a facility with a “Direct” NCI must be completed no more than 45 days after the date of the inspection. You must conduct a reinspection at the facility even if the “Direct” NCI was corrected during the inspection.

**Direct NCI on a New Site Approval Inspection**

If a Direct NCI is identified on a New Site Approval inspection:

- Designate the NCI as a “Direct”, and
- Assign an appropriate correction date, and
- Inform the licensee that an “unannounced” inspection will be conducted on or after the correction date to see if the Direct NCI was corrected.

If the licensee contacts the inspector for another New Site Approval inspection prior to the Direct NCI correction date, document the Direct NCI as corrected in the Inspection Report for that inspection.

**“Veterinary Care Direct” NCI Identified**

Not every veterinary care NCI affecting an animal is a Direct.

A vet care noncompliance is a Direct if:

- The noncompliance is currently (at the time of the inspection) having a serious or severe adverse effect on the health and well-being of the animal, or has the high potential to have that affect in the immediate future.
- The licensee/registrant has not sought veterinary care for the animal prior to the inspection, and

When citing a vet care “Direct” NCI:

- Include the ID of the animal if applicable and a description of the animal (species, breed, color, sex, age, etc.) in the NCI narrative.
- Take a photo of the entire animal and a photo(s) and/or video of the area cited in the NCI.
- A correction date, if given, should be very short, e.g., 1 day.
- If the animal(s) has been taken to the veterinarian and care has been provided, including humane euthanasia when directed by the veterinarian, prior to your completion of the inspection note in the narrative that the animal(s) was evaluated and treated by a veterinarian.

Do not interfere with the licensee obtaining immediate veterinary care for an animal if needed.
For a **corrected** vet care Direct:

- Note that the Direct was corrected on the original Inspection Report if corrected at the time of the inspection, OR
- Note that the Direct was corrected on the follow up Inspection Report
- Photograph or video the correction, label accordingly, and upload into ACIS

### ACI Team Inspection with a VMO After a Vet Care Direct

After a vet care Direct is identified on an inspection by an ACI:

- A VMO **must** be present on the next full inspection of the facility.
- The ACI may choose to take a VMO on the Focused Inspection to follow up on the Direct vet care NCI.

### Exit Interview

An exit interview is **required** for all inspections (complete or focused), unless your personal safety is at risk, or harassment, verbal abuse, or other factors are interfering with the inspection process.

Conduct an in-person exit interview with the draft Inspection Report in hand if the licensee/registrant requests the opportunity to review the NCI narrative(s) prior to finalization of the Inspection Report.

Take as much time as necessary during the exit interview to:

- Educate the licensee/registrant about animal welfare and the AWA regulations and standards.
- Summarize everything that occurred during the inspection, and provide the licensee or registrant an opportunity to present additional information that may influence the determination of compliance.
- Discuss each noncompliant item in detail with the licensee/registrant or facility representative. If the licensee, registrant, or applicant provides information or documentation that influences an NCI on the current version of the Inspection Report, modify the report to accurately reflect the compliance of the facility before it is issued.
- Discuss what the licensee/registrant may do to correct the problem (if asked).

Unless an exit interview could not be completed (for example, it is unsafe or there may not be an exit interview for a carrier inspection at an airport), a statement must be included on all Inspection Reports stating, “This inspection and exit interview were conducted with ________________.” Do **not** use actual names of facility representative or personnel, only titles. ACIS will put
the names of other AC inspectors on the team into the report for you. If you are accompanied by other government personnel (ex. IES, Security), you do not need to include their names on the report.

**NOTICE**

If the Inspection Report is to be delivered by email or certified mail, you must still conduct a detailed and thorough exit interview. Any item that you will be citing on the Inspection Report must be discussed during the exit interview.

**Signature on the Inspection Report**

The inspector and the licensee/registrant or his/her representative should sign the Inspection Report. The signature of the licensee/registrant or his/her representative certifies that the person received a copy of the Inspection Report. It does not necessarily mean that the person agrees with the findings of the inspection.

If the facility representative refuses to sign the Inspection Report:

- Leave the signature block blank, and
- Leave a copy of the Inspection Report with the representative,
- Send a copy via certified mail.

Explain the circumstances of the refusal in a memo to your SACS, including who said what to whom, when, where, and how, using specific language, and send a copy to the Animal Welfare Operations field office for the facility file.


**Handwritten or “Word” Inspection Reports**

If you are unable to complete the Inspection Report in ACIS, then complete the Word Template on your laptop or handwrite a report. In the event that your laptop is unavailable, carry several hard copies of the template.

If you completed a handwritten or Word Inspection Report:

- You and the licensee should sign two copies and leave one copy with the licensee/registrant.
- Enter the Inspection Report into ACIS as soon as possible but no later than 5 business days after the inspection.
- On the ACIS Inspection Report:
  - Do not put a statement that this is electronic or transcribed version of the original Inspection Report.
It is not necessary to change the “prepared by” date in ACIS even though it will not match the date on the handwritten or Word Inspection Report. The original Inspection Report will be available in the event of questions.

Mail the hard copy of the original Inspection Report to the appropriate Animal Welfare Operations field office.

If the ACIS Inspection Report is exactly the same as the handwritten or Word Inspection Report except for the “prepared by” date, a copy does not have to be sent to the licensee/registrant.

**Delivery of the Inspection Report**

You must hand deliver Inspection Reports with Direct NCIs unless you obtain supervisory approval to do otherwise.

Hand delivery is preferred for all inspections except for Attempted Inspections. However, Inspection Reports may be delivered via email or certified mail, if necessary. First Attempted Inspection Reports may be sent by regular first class mail or email. For all delivery methods, the Inspection Report must be sent to the facility as soon as possible but no later than 5 business days after the inspection. Obtain supervisory approval if you cannot meet this deadline.

If sent by email, the inspector must convert the Inspection Report to a PDF so it cannot be altered and must request an email reply verifying receipt of the Inspection Report by the facility. The email receipt must accompany the original Inspection Report into the Animal Welfare Operations field office. If an email reply is not received within 5 business days from the day it was sent, the inspector must deliver the report by another method so that receipt can be verified. There is no need to amend the report to remove the email delivery statement. The new delivery method type and “received by” date must be handwritten on the copies of the Inspection Report that will be delivered to the facility and the Animal Welfare Operations field office.

When sending an Inspection Report by certified mail, type the certified mail number in the name line and the statement “Sent by certified mail” in the title line.

**Airport Inspections**

The inspector is not required to obtain a signature and deliver airline Inspection Reports with no NCIs at airports at the time of the inspection. The Animal Welfare Operations field office will mail these no NCI Inspection Reports to the appropriate airline corporate office. Send a copy of the Inspection Report(s) with a note to send to the airline(s) to the attention of the appropriate Animal Welfare Operations field office.
Inspection Photographs

Photographs or videos **must** be taken to document photographable noncompliant item(s) in all of the following situations and **only** in these situations unless instructed otherwise by your SACS:

- Direct, Criticals, or Repeats NCIs (if photographable)
- Direct NCIs that have been corrected (to document the correction)
- NCIs cited at a facility with an ongoing Investigative and Enforcement Services (IES) investigation
- NCIs where there is a disagreement between you and the licensee/registrant and the licensee/registrant has indicated he/she will, or is likely to appeal the citation

**NOTICE**

A Prelicense Inspection cannot be appealed. Do **not** take any photographs at a Prelicense Inspection.

- All NCIs cited at commercial airline carrier inspections
- Vet Care NCIs involving animals:
  - Photograph(s) or video(s) every animal covered by the citation and when reinspected or corrected (do not take photos of corrected Vet Care NCIs, such as outdated drugs and unsigned PVCs)
  - Photograph(s) or video(s) the entire animal for identification purposes and photo(s) of the issue cited in the NCI
  - Photograph labels must clearly identify the animal

For veterinary care citations, take photograph(s) or video(s) of every animal covered by the citation, including matted dogs; for facility violations, such as pens with broken wire, take a few representative photos to prove that there was an NCI but not a photo of every cage or area.

Photocopy, scan, or photograph records that document Repeat, Direct, Critical, or transportation noncompliant items, and any records that may be fraudulent. If copies of research facility records, protocols, or IACUC minutes are going to be photographed and removed from the facility, the facility will be afforded the opportunity to review/redact the records for proprietary business information. The inspector should allow the facility 24 to 48 hours for this purpose.

Label and upload all photograph(s) or video(s) that are to be retained into ACIS as soon as possible, but **no** later than 2 weeks after the inspection. Photograph(s) or video(s) that do **not** need to be retained **must** be deleted by
Required Inspection Procedures
Risk Based Inspection System (RBIS)

the inspector. Supervisors may have inspectors take additional photographs, in addition to the required photos listed above.

Risk Based Inspection System (RBIS)
You must inspect the following facilities on or before the deadline date given in ACIS:

◆ Facilities with Direct NCIs
◆ Facilities with High Inspection Frequency (HIF)
◆ Research facilities which must be inspected at least once every fiscal year

If you cannot, contact your SACS prior to the deadline so that another inspector can be assigned to conduct the inspection.

Deciding Not to Conduct an Inspection
In some circumstances when you arrive at the facility, you may determine that it is not appropriate to conduct an inspection. If you are unsure whether you should conduct an inspection, or if this is a recurring issue at this facility, contact your SACS. If you do not conduct an inspection, document this visit on your Time and Attendance Report. Do not cite it as an Attempted Inspection.

Examples of situations where you may choose not to conduct an inspection include, but are not limited to:

◆ Contagious disease in the animal facility such as parvovirus (you may want to contact the Attending Veterinarian for more information)
◆ Illness of the licensee with no other responsible person available
◆ Personal events such as weddings, funerals, doctor/veterinarian appointments, or family emergencies
◆ Religious holidays

Attempted Inspection
All animal welfare inspections must be unannounced with the exception of Prelicense Inspections, new site approval inspections, or in special circumstances under the Direction of your SACS. An Attempted Inspection occurs when an authorized person is not available to accompany the inspector, and no inspection is conducted.

If an authorized person is not present at the facility, call the phone number(s) provided by the licensee/registrant, and determine if an authorized person can be at the facility within 30 minutes. Wait for 30 minutes, and if the authorized
Attempted Inspection

If a person or a designee does not arrive, leave the facility and cite Section 2.126(b) for licensees, carriers and intermediate handlers and Section 2.38(b) for registered research facilities. In the citation narrative, write a brief description of what you did to contact the licensee/registrant, e.g., called all the contact numbers provided, knocked at the door, waited 30 minutes, etc.

Send the Inspection Report for the first citation of an Attempted Inspection by regular mail or email only. Send Inspection Reports citing Repeat Attempted Inspections to the licensee or registrant by both regular and certified mail or email. Convert any emailed Inspection Report to a PDF so that it cannot be altered.

If there is an adult at the facility, they can sign the Attempted Inspection Report and give it to the licensee or if the inspector returns to conduct an inspection the next day, the licensee can sign the Attempted Inspection Report from the previous day at that time. If there is more than 1 day between the attempt and the inspection, send the report as above.

**Optimal Hours of Inspection**

Identify the optimal hours of inspection for:

- Any licensee, not open to the public, who requests optimal hours
- Licensees/registrants who have had two consecutive Attempted Inspections or three Attempted Inspections in 2 years

Record the optimal hours in the ACIS “Customer” tab comment box. Optimal hours are generally 4 hour blocks of time during daylight hours three days per week. This is not, however, a requirement. Use your professional judgment to consider two entire days per week, or another set of optimal hours, that will facilitate the unannounced inspection. If, after discussion, the suggested Optimal Hours still seem unworkable, contact your SACS.

If the licensee is not at home during the designated hours, cite as an Attempted Inspection as above. If you stop by the facility at other times and the licensee is not home, record the visit on your Time and Attendance sheet, but do not cite as an Attempted Inspection. Remember, inspections are never announced.

**Optimal Hours Form Letter**

Use the Optimal Hours Form Letter (OHFL) when the inspector and the licensee/registrant cannot agree on acceptable hours of inspection. Prior to sending the letter, you must discuss the problem with your SACS.

If it is determined that the OHFL is appropriate, the inspector should:

- Complete the letter.
Required Inspection Procedures

Prelicense Inspection

Keep a copy of the letter for your file.
Note in the licensee/registrant’s ACIS “Customer” tab comment box that the OHFL was sent and the date.
Send a copy of the letter to the Animal Welfare Operations field office (ILA will scan into ACIS).
Send the letter to the licensee/registrant by certified, return receipt mail.

If the licensee/registrant later contacts the inspector with acceptable hours of inspection, you should record the optimal hours in the ACIS “Customer” tab comment box.

Prelicense Inspection

An applicant’s facility must meet all applicable regulations and standards to obtain a license. Prelicense Inspections are scheduled at a time agreeable to the applicant and the inspector. Do not conduct a Prelicense Inspection until all of the applicant’s paperwork has been processed by the Program Section and the inspector has been informed that the applicant may be inspected.

In addition to determining if a facility is in full compliance, Prelicense Inspections are the best time to educate the applicant about the AWA regulations and standards using the enhanced prelicense process. Required written records (e.g., APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers on page A-2, and the “Plan for Environmental Enhancement” for nonhuman primates) must be complete and inspected during a Prelicense Inspection in order to consider the facility in compliance. There must be a written record of animals on hand with as much of the required information completed as possible.

For an applicant with large carnivores, elephants, great apes, and/or marine mammals, handling practices and employee qualifications must be reviewed. If the review is ongoing, an appropriate statement similar to the following statement should be included on the Inspection Report:

“The animal enclosures, handling practices, and/or employee qualifications are under review.”

If the enclosures, handling, or qualifications require review, it is the responsibility of the inspector conducting the prelicense process to contact the appropriate AC personnel, i.e., SACS and species specialist or AC Specialist, to inform them that a review is required. If the review is not completed in a timely manner, the inspector should contact his/her SACS.
For an applicant with large carnivores, elephants, great apes, and/or marine mammals that was previously licensed, failed to renew and is now reapplying, there is no requirement for a new review of enclosures, or handling or employee qualifications, unless something has changed since the license was valid. If the applicant previously had a variance (e.g., perimeter fence), the applicant must reapply for the variance under the new license.

**Dealers**

On every Prelicense Inspection that includes dogs, the inspector must:

- Have the applicant pull all dogs showing signs of medical issues so that you can evaluate whether veterinary attention is needed and/or is already being provided, and
- Also select ten percent of the remaining dogs for the applicant to pull so that you can look for medical issues associated with their mouths, teeth, ears, eyes, skin, general condition, etc. Do not just focus on one area; take the opportunity to look at the entire dog for medical issues.

**Remember**, wear a new pair of gloves after touching each dog or after each enclosure.

If you identify a veterinary care issue that would normally be cited during a Routine Inspection, it must be cited on the Inspection Report for the Prelicense Inspection.

**Exhibitors**

During the inspection, verify that the number of animals present at the facility matches the number reported on the APHIS Form 7003A—Application for New License on page A-6 to assure the correct fee is assessed.

**Facility Not in Full Compliance**

If the facility is not in full compliance, cite all noncompliant items using the first three components of the four-part citation description found in New NCIs Identified but do not give correction dates.

**NOTICE**

Do not designate any noncompliance as a Direct or Repeat.

Include the following or similar statement after the NCIs in the narrative:

“All items must be in compliance within (number of Prelicense Inspections left; one or two) more inspections or by (date 90 days from first Prelicense Inspection), or the applicant will forfeit the application fee and must wait 6 months to reapply. Conducting regulated activities without a valid USDA license is a violation of the Animal Welfare Act.”
If a third Prelicense Inspection is necessary, a second inspector or supervisor **must** be present during the inspection.

**Facility in Full Compliance**
If the facility is in full compliance, generate a no noncompliance Inspection Report and include the statements in the narrative as follows:

No non-compliant items identified during this inspection.

Inspection and exit interview conducted with ________________. See Exit Interview on page 2-12.

The applicant has met the licensing requirements and wants to be licensed as a Class (A Dealer, B Dealer, or C Exhibitor).

*If applicable, the inspector may add topics discussed with applicant, such as Identification, Recordkeeping, etc.*

Licensing fee **must** be mailed to:

USDA APHIS Animal Care  
(Field Office Address)

NO REGULATED ACTIVITIES ALLOWED UNTIL A LICENSE CERTIFICATE IS OBTAINED.

**Refusal of Inspection**

If a licensee or registrant refuses to allow an inspection, ensure that you have clearly identified yourself as a USDA Animal Care inspector, and that the licensee/registrant is aware of the serious nature of this noncompliance of AWA regulations. If you are sure that you are safe, ask this question, “Are you refusing to allow the inspection?” If the licensee/registrant still refuses to allow an inspection, leave the premises and complete an Inspection Report Designating this as a Routine Inspection. Cite Section 2.126(a) for licensees or registered transporters, Section 2.38(b) for registered research facilities. Document the specific circumstances of the refusal in the Inspection Report narrative: be specific as to date, time, and the identification of the person who refused to allow the inspection. Include any pertinent statements made by the licensee or registrant.

If two or more APHIS officials are present for the inspection and one is denied entry, document this as a refusal of inspection. Do **not** conduct an inspection.

Send the Inspection Report for a refusal to the licensee or registrant by both regular and certified mail.
Communicate any “refusal to allow inspection” with your SACS to develop a plan for a follow-up inspection.

**Interference**

If you are being harassed, verbally abused, or interfered with in the course of carrying out inspections, inform the licensee or registrant that the inspection can only continue if the harassment, verbal abuse, or interference stops. If the activity or behavior continues, **you must discontinue** the inspection process and leave the premises and cite.

If the activity or behavior of the licensee or registrant in any way compromises your ability to conduct a complete inspection, it is a form of harassment and you should leave the facility and cite.

Write a Routine Inspection Report citing Section 2.4 for licensees, Section 2.25(c) for registered transporters, or Section 2.30(d) for registered research facilities. In the narrative, be specific as to date, time, and the identification of the person(s) involved, including details of the harassment and/or verbal abuse, and/or interference.

Send the Inspection Report to the licensee or registrant by regular and certified mail. For any “interference with the inspection,” communicate with your SACS to develop a plan for follow-up inspections.

<table>
<thead>
<tr>
<th>SAFETY</th>
</tr>
</thead>
<tbody>
<tr>
<td>If you are being threatened, follow procedures to ensure your safety including, but not limited to, leaving the premises and calling 911, if necessary. After your personal safety is ensured, consult with your supervisor with regard to future steps.</td>
</tr>
</tbody>
</table>

**Correcting, Rescinding, and Amending Inspection Reports**

Correcting, rescinding, or amending Inspection Reports is done on a case-by-case basis under the Direction of your SACS or the Animal Welfare Operations field office.

**Correcting Inspection Reports**

An Inspection Report that has been finalized but a copy has not been given to the licensee/registrant yet, may be corrected by requesting through your SACS that the Inspection Report be reset to draft.
Rescinding and Amending Inspection Reports

An Inspection Report that has been finalized and a copy has been given to the licensee/registrant, may be corrected by requesting through your SACS that the Inspection Report be rescinded so it can be amended.

**NOTICE**

You may **not** add a Direct, Critical, or Repeat designation or an additional citation to an Inspection Report after it has been given to the licensee or registrant.

For amended Inspection Reports:

- Do **not** put any statement on the Inspection Report that this is an amended Inspection Report.
- Complete the Amended Inspection Report letter using the template in Appendix A-Amended Report Letter.
- Deliver the amended Inspection Report and letter to the licensee/registrant using the approved methods of delivery.

Inspection Report and Teachable Moments Review

The SACS or his/her designee **must** review the Inspection Reports and teachable moments in the SACS Review section of ACIS in a timely manner.

Review the Inspection Reports to ensure that, at a minimum:

- All required information is included and correct
- All subparts of the citation are included in the narrative
- NCI narrative is clear, objective and free of significant errors
- Directs, Criticals and Repeats are designated correctly
- The exit interview statement is included in the narrative section
- No information that should not be on the Inspection Report is in the narrative
- Photographs are included if required
- Animal inventory is included

Use the Inspection Report Review Checklist on page A-28 as a guideline for reviewing Inspection Reports.

Review the teachable moments to ensure that, at a minimum:

- The facility is eligible for the use of Teachable Moments
- The NCI is appropriate to be a Teachable Moment
◆ The description of the Teachable Moment is appropriate
◆ The Teachable Moment Form is completed properly

Use the Teachable Moments Review Checklist on page A-34 as a guideline for reviewing teachable moments.
Chapter 3

General Inspection Procedures

Contents

Preparing for the Inspection  3-3
Conducting the Inspection  3-3
  General Information  3-3
  Inspection on Native American Land  3-4
  Biosafety Measures  3-5
Animal Inspection  3-5
  General Information  3-5
  Inspector Behavior Guidelines Around Animals  3-7
  Stopping the Inspection for Veterinary Care  3-11
  Pet Dogs  3-12
  Barn Cats  3-12
Facility Inspection—Specific Issue Guidance  3-13
  Housing Facilities – Indoor, Sheltered or Outdoor  3-13
  Lids on Self-Feeders  3-15
  Perimeter Fence—Instances When A Perimeter Fence Is Not Required [3.127(d)]  3-15
  Perimeter Fence—Open Gate  3-16
Miscellaneous Inspection Guidance  3-17
  Authorized Person Selling Animals  3-17
  Field Specialist Consultations  3-17
  Identification of Unsafe Facility Conditions  3-17
  Team Inspections  3-18
  Action to Take on Noncompliant Item Noted While Off Duty  3-19
Completing the Inspection Report  3-20
  General Information  3-20
  Changes in Business Information  3-21
  Type of Inspection  3-21
  Inspection Report Narrative  3-22
  Examples of Citations  3-22
  Repeat Noncompliant Item Identified  3-26
  Direct Noncompliant Item Identified  3-26
  Critical Noncompliant Item Identified  3-26
  Noncompliant Item with Correction Time Remaining  3-26
  No Regulated Animals Present  3-26
  Finalizing the Inspection Report  3-28
  Correction Date  3-29
  Extension of Correction Date  3-30
  Mistakes on the Inspection Report  3-33
DISCLAIMER

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, the AC Policy Manual, the Required Inspection Procedures, standard procedures, or the inspector's professional judgment. All inspection decisions must be justified by applicable sections of the regulations and standards.
Preparing for the Inspection

Review the appropriate information in order to conduct a thorough inspection.

Prior to inspection, review the following information:

- Applicable sections of the Required Inspection Procedures, Specific Types of Inspections, and this Inspection Guide
- Applicable sections of the regulations and standards
- Current enforcement actions
- Facility’s past inspections
- Animal Inventory
- Optimal Hours of Inspection
- Other relevant resources
- Variances or extensions that may have been granted

Notices

For forms and sheets that you may need during or after the inspection, see Appendix A—Forms and Worksheets.

Conducting the Inspection

Each inspector must develop a consistent method of conducting inspections to ensure that his/her inspections are thorough, accurate, and in accord with this guidance and the AWA.

General Information

The basic steps for conducting an inspection are outlined below. However, the exact procedure for conducting an inspection is at the discretion of the individual inspector.

- You should inspect a facility at different times of the year if possible, rather than inspecting the same month or season every year.
- Upon arrival at the facility, be alert for unsafe conditions.
- If the facility, e.g. zoo, theme park, or wild animal park has an admission gate or ticket window:
  A. Go to the admission gate/ticket window.
  B. Identify yourself in a professional manner.
  C. State the purpose of your visit.
  D. Show your USDA badge and ID.
◆ At most facilities, you will not be required to pay admission. However, if an admission fee is requested, you can ask to speak to someone in management. If you need to pay admission, contact your SACS for approval, then charge the admission fee on your Purchase Visa (preferable), or pay cash and you will be reimbursed.

**NOTICE**

Under certain circumstances, you may want to observe the exhibition, facility, or facility personnel prior to announcing your presence. If necessary, pay the entrance fee and you will be reimbursed. The observation should be done from areas accessible to the general public. Immediately after observing the exhibition/facility/personnel, you must announce yourself to the licensee/registrant or facility representative and arrange to complete the inspection and address any findings that you observed prior to announcing yourself.

◆ Prior to conducting the actual inspection or immediately after your unannounced observation:

  A. Contact the licensee/registrant or authorized representative.
  B. Introduce yourself in a professional manner.
  C. State the purpose for the visit.
  D. Show your USDA badge and ID.

**NOTICE**

Do not allow anyone to photograph or photocopy your government ID. If you are denied access to a facility or not able to conduct an inspection for this reason, this should be considered a refusal of inspection and cited.

  E. Provide a business card, if appropriate.

◆ If you do not find anyone at the facility, follow procedures for an Attempted Inspection (see Attempted Inspection in Chapter 2).

◆ For Traveling Exhibitor Inspections, see Traveling Exhibitor Inspection.

**Inspection on Native American Land**

If you have to conduct an inspection or search on Native American lands, contact the tribal leader prior to conducting the inspection/search to explain why you are there.

If the tribal leader refuses to allow you to conduct the inspection/search, leave the land, and contact your SACS or your Animal Welfare Operations field office.
Biosafety Measures
Biosafety measures when conducting an inspection include, but are not limited to the items listed in Table 3-1. Follow the facility’s biosafety procedures or put on the recommended protective clothing, gear, and/or boots.

Table 3-1 Biosafety Measures When Conducting an Inspection

<table>
<thead>
<tr>
<th>If you are inspecting:</th>
<th>Then wear:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dogs or cats</td>
<td>◆ Disposable shoe covers (required)</td>
</tr>
<tr>
<td></td>
<td>◆ Disposable gloves (required if touching any animal; change gloves between each animal or cage)</td>
</tr>
<tr>
<td></td>
<td>◆ Ear plugs (optional but <strong>highly recommended</strong> for dog kennels)</td>
</tr>
<tr>
<td></td>
<td>◆ Coveralls (optional)</td>
</tr>
<tr>
<td>Elephants (TB positive or TB suspect)</td>
<td>◆ Respirator (level N95 or better)</td>
</tr>
<tr>
<td>Macaques</td>
<td>◆ Respirator (level N95 or better) <strong>required</strong> if within 5 feet or less</td>
</tr>
<tr>
<td></td>
<td>◆ Disposable shoe covers</td>
</tr>
<tr>
<td></td>
<td>◆ Coveralls, preferably disposable</td>
</tr>
<tr>
<td></td>
<td>◆ Full face shield and eye protection, such as safety glasses or goggles</td>
</tr>
<tr>
<td></td>
<td>◆ Disposable gloves</td>
</tr>
<tr>
<td>Other nonhuman primates</td>
<td>◆ Respirator (level N95 or better when nonhuman primates and other animals are suspected to be infected with TB indoors, or within 5 feet or less outdoors)</td>
</tr>
</tbody>
</table>

1 Send all questions and suggested changes to the AC Safety and Occupational Health Manager and the current Chair of the AC Safety and Health Committee.

Animal Inspection

General Information
Basic steps or procedures when conducting an inspection of the animals include, but are **not** limited to:

◆ Approach all wild animals quietly and cautiously
◆ Ask if there are any other animals that you have **not** seen, such as those in quarantine, isolation, holding areas, off-site, or on loan or lease
◆ Be alert for escape routes for yourself in case of a dangerous situation
◆ Before approaching an animal, ask the licensee or research facility representative:
  ❖ About the temperament of the animal
  ❖ If the animal is approachable
  ❖ Where is the safest place to be
Let the person accompanying you open and close gates and doors to prevent escapes

Always have the person accompanying you go through the gate or door first as a safety measure

Make sure all animals are safely secured

NOTICE
The licensee, registrant, or applicant is responsible for ensuring the safety of the inspector around animals. If you feel unsafe, ask the facility representative or designated authorized representative to correct the situation. If you feel you are in danger, safely leave the area.

Observe handling techniques of personnel at both licensed facilities and during prelicense inspections, but note that:

- For licensed/registered facilities, the inspector evaluates the handling experience and qualifications of the personnel and cite as appropriate
- For applicants:
  - Inspector should evaluate the handling seen during the prelicense inspection and cite as appropriate
  - Applicant should submit his/her overall handling experience and qualifications to the Raleigh Animal Welfare Operations field office. These will be evaluated by the Animal Care Specialist (ACS). If you observe any handling issues, inform the Raleigh ACS.

Observe the animals for their health and well-being

- Avoid handling the animals unnecessarily
- Do not engage in diagnostic procedures
- If a dangerous animal needs close evaluation, ask the facility to make arrangements for the animal to be examined by a veterinarian
- If you need to closely examine a non-dangerous animal and it can be done safely, have the owner or handler restrain the animal
- Wear disposable gloves if you must handle any animals

Stay behind or next to the licensee/research facility representative

Review husbandry practices

NOTICE
Newborn and infant nondomestic cats 4 weeks (28 days) of age or younger should be housed in the controlled environment of a heated, clean and sheltered enclosure (such as a nursery), or in a clean, sheltered enclosure with the mother and any healthy siblings.

Review personnel experience and training
◆ Review veterinary care practices and records
◆ Review public contact procedures
  ❖ Public contact, feeding, or handling of nondomestic cats 4 weeks (28 days) of age or younger is **not** allowed under the AWA regulations
  ❖ For regulatory purposes, AC generally considers big cats to become juveniles when they reach 12 weeks of age. Inspectors should not use this age as an absolute “cutoff date,” but rather should use it as a guideline when evaluating exhibits that allow public contact with big cats that are at or older than 12 weeks of age. At approximately 12 weeks of age **dangerous animals**, such as, tigers, lions, bears, and wolves, become too big, too fast and too strong to be used for public contact.
◆ Review the required AV-approved Plans such as the Exercise Plan for Dogs and the Environmental Enhancement Plan for NHPs (See Appendix A for the EEP Checklist).

**Inspector Behavior Guidelines Around Animals**
Animal Care inspectors may be asked to do on-site inspections of circuses, zoos, animal sanctuaries, or other facilities that may house a variety of non-domestic animals. Inspectors should understand and follow appropriate behavior guidelines when evaluating non-domestic animals such as primates, non-domestic cats, elephants, marine mammals, or other zoo or wild animals. Owners, keepers, or trainers of these animals may not provide adequate instruction to the inspector or correct the inspector regarding appropriate behavior when working around these animals. Inspectors lacking experience working around non-domestic animals may be at risk or may leave a poor impression with the licensee. This section discusses appropriate inspector behavior when inspecting non-domestic animals.

An inspector should **never** enter the enclosures of dangerous or potentially dangerous animals unless the inspector personally verifies the animals are securely locked out of the enclosure.

Rules of behavior when inspecting non-domestic animals are:

◆ INTERACTION: Do **not** reach out to, or try to pet or feed the animals, no matter how friendly they may seem.

◆ PROXIMITY: Do **not** stand within reach of them.
  ❖ Big cats and non-human primates may reach out over 3 feet through narrow spaces.

◆ AGITATED BEHAVIOR: If the animal appears agitated because of your presence, make your observations quickly or from a greater distance.
**General Inspection Procedures**

**Conducting the Inspection**

- **LIMITING STRESS:** Some animals become stressed or agitated around strangers. Standing in front of an enclosure and looking, staring, or pointing at an animal while discussing issues with the licensee may cause stress or agitation. It is best to discuss any issues that may pertain to that animal or its enclosure at a reasonable distance from the enclosure.

- **YOUR REACTIONS:** Try not to react if some animals vocalize or hit the fence or enclosure where you are standing. Many animals are looking for a reaction. Make your observations and quickly move on.

**Nonhuman Primates**

Primates are social animals and have complex social behaviors. Staring directly at primates is considered a threat to them, and may cause them to be agitated, especially if they are in their behind-the-scenes night quarters. While most zoo primates are accustomed to people staring at them, the public is not allowed behind the scenes and staring may be more threatening to them in their off-exhibit areas. Smiling at many species of primates may also be considered a threat, and while a primate may “smile” back, realize he is not smiling, but showing you his teeth, which may indicate a sign of aggression. Try not to point at the animals with your finger, and do not stand close enough to any enclosure that the primate may be able to touch or grab you. If a chimpanzee, gorilla, or orangutan were to grab any part of you with just one finger, it could cause significant injury or damage to your person or your clothing.

Great apes (chimpanzees, gorillas, or orangutans) may also spit water or throw fecal material or other items at strangers or at people they know but don’t like, e.g., the veterinary staff. They may be obvious in picking up fecal material or items in their enclosure and throwing it in your direction; however, many wait until you turn your back, and can hit their targets with amazing accuracy. Orangutans have a longer reach than the other great apes, and maintaining an extra distance of greater than 4 feet from them as a margin of safety should be considered.

**BEWARE:** Macaques have a high probability of being unapparent carriers of Herpes B virus, which is deadly to humans without appropriate and immediate treatment. One drop of saliva or urine from a macaque shedding the virus splattered into a human eye or mouth, or transmitted through a bite or scratch injury has been known to cause the fatal disease. If you are inspecting a facility with macaques, be sure to protect yourself from the possibility of a bite, scratch or spray of urine or feces from these animals. Some facilities require personal protective equipment such as a clear face guard or safety goggles, a surgical mask, gloves, and protective clothing when entering rooms housing macaques. When there are no protective equipment requirements, you must stay a minimum of 5 feet away from any macaque enclosure. Any inspection of macaque species within 5 feet or less of the animals or enclosures requires the use of a full-face shield, respirator, disposable gloves, foot wear, and coveralls.
Inspectors must not enter rooms when facility employees are spraying or cleaning enclosures or room surfaces, or performing functions that could result in splash hazards or aerosol production.

**Big and Small Non-domestic Cats**

Cats are sensitive animals and may become agitated in the presence of strangers. Cats of all species will flatten their ears when angry or agitated. Recognize this behavior and step away from the enclosure before the cat becomes more agitated and either vocalizes or hits the enclosure fence. Talking to the animals when they are agitated rarely soothes them, as you are a stranger in their environment.

Many cats will spray-mark their environment. Often big cats, especially tigers and lions, will exhibit this behavior towards people. The cat may be standing near the front of the enclosure or will calmly walk to the enclosure fence, often near the area where people are standing. They will then turn, lift their tail, and spray urine up to 10 feet away. If you notice this behavior, you will have only a moment to step out of range.

**BEWARE:** Many enclosures, especially night quarters or gates to enclosures, have a small space between the bottom of the enclosure, fence and the ground, or around gates or feeding chutes. Livestock wire fencing has ample spaces in the fencing itself. Big cats (and small non-domestic species) are able to reach through these spaces and have been known to attack unsuspecting persons who are standing too close. Stay a minimum of 3 feet away from all big cat enclosures. Many licensees will have a protocol and an obvious painted “safety line” on the floor or a barrier running adjacent to the big cat enclosures. If entering a narrow hallway between two cages, ensure you know the whereabouts of the cats, and be careful not to back up against one enclosure with a cat present if you are startled by another cat across the hallway. Try to maintain your distance from all enclosures when in tight quarters, and if the situation seems dangerous, ask the keepers to shift the cats to enclosures away from the hallway while you conduct your inspection.

**Elephants**

All elephants have the potential to be dangerous. Elephants can reach up to 8 feet with their trunks. Staying back a minimum of 8 feet, even if the elephant is chained or behind a barrier, will help to ensure your safety. Keep the handler between you and the elephant(s) at all times. Work with the handler to determine the best (safest) place to make your observations, while maintaining an 8 foot distance from the elephant’s trunk. When inspecting elephants, always have an escape route planned. When inspecting other areas of the elephant barn and the yard(s), ensure a handler or facility representative always accompanies you. Always ensure that you know the location of the elephant(s) during the entirety of your inspection.
Elephants are usually handled in two basic ways: protected contact or free contact. Protected contact involves managing an elephant with a barrier between the handler and the elephant. In protected contact, handlers do not share the same space as the elephant. Free contact involves managing the elephants without a barrier between the handler and the elephant. In free contact, the handlers share the same space as the elephant. In this management system, handlers commonly use an ankus when working with the elephant. An ankus is a device that resembles a short boat hook and has a spike and a hook.

In a protected contact system, ask the handler(s) to position the elephant(s) behind a barrier so that an inspection of the animal’s feet, skin, teeth, and other parts can be conducted as needed. Although the elephant is behind a barrier, be cognizant of the elephant’s trunk and maintain an 8-foot distance from the head of the elephant to ensure your safety. If needed, use your camera to get a closer view. In a protected contact management style, handlers will not enter the enclosure with the elephant(s) and you must not either.

In a free contact system, the handler will often invite the inspector to get up close to the elephant(s). Remember to keep the handler between you and the elephant, have an escape route planned and maintain your 8-foot distance (using your camera for a closer view, if needed). Do not go into an enclosure with an animal handled in free contact. Ask the handler to position the elephant in a manner that will allow you to conduct an inspection from a safe location and in a safe manner.

Regardless of the contact system, if the elephant shows signs of agitation (vocalizing, flapping ears, pulling itself to its full height, jerking its head up and down) or is not responding appropriately to the handler’s commands, immediately leave the area and let the handler manage the problem. If necessary, find a location to continue observing the animal that will maintain your safety. Remember, elephants have the potential to be dangerous. Being cognizant of their location, behavior, and management style is essential to conducting a safe and thorough inspection. Working with the handlers to conduct the inspection is essential, keeping in mind that you are putting yourself at risk when you go near an elephant, even if the handler appears to be exceptionally competent.
**Hoofstock**

Non-domestic hoofstock (eland, oryx, nilgai, kudu, bison, deer, etc.) may be dangerous. Bison and other bovid-type non-domestic hoofstock, as well as cervids (generally bucks), have been known to charge or butt people without warning. When inspecting non-domestic hoofstock, ensure a sturdy fence is between yourself and the animals, and do not stand within reach of these animals. It is rarely necessary to enter a hoofstock enclosure, but if absolutely necessary, ensure the handler/keeper is always between you and the animals, and consider an escape route before entering the enclosure. Whenever possible, enter veldt-type enclosures (large pens housing multiple species of hoof stock) in a vehicle.

Camels and llamas may spit when upset, and llamas have been known to push upon, and knock over people. Note that llamas will flatten their ears when getting ready to spit. Camels may be dangerous, especially intact males. Male camels have reached over enclosures and bitten or lifted people off the ground.

Non-domestic hoofstock, have varying flight distances, which is the distance they will allow someone to approach before they flee or bolt. It is undesirable to upset the hoofstock in an exhibit, and inspectors must maintain a reasonable distance between themselves and the hoofstock living in that enclosure. Allow the keepers to suggest a distance for you to observe that is appropriate and non-threatening to the animals.

**BEWARE:** Some facilities may house ostriches with their hoofstock. Ostriches, especially males, may be deadly, and have been known to attack and seriously injure or even kill people, often unprovoked and without warning. Their kick is powerful and they kick high and forward, aiming directly in front of them. Never enter a mixed exhibit on foot where male ostriches are housed. Cassowaries are also very dangerous birds. Never enter an enclosure housing a cassowary.

**Potential Rabies Exposure**

If you are inspecting facilities where you will be entering exhibits or enclosures which contain free-roaming (or free-flying) mammals, such as raccoons, skunks, or bats, and you feel there is a potential for being bitten or scratched, or you feel there is potential for rabies exposure via the aerosol route (no matter how remote), you should wear personal protective gear, such as a mask or respirator and goggles, and have pre-exposure rabies prophylaxis.

**Stopping the Inspection for Veterinary Care**

If during an inspection, you notice an animal that needs immediate veterinary care, instruct the licensee to seek vet care for the animal and stop the inspection if necessary.
Examples of when an animal may need immediate vet care include, but are not limited to:

- Unresponsive animal
- Pale pink or white gums
- Labored breathing/open-mouthed breathing
- Fractured or dislocated limb
- Severe bleeding or injury
- Severe, watery or bloody diarrhea

**Pet Dogs**
Because personal pet dogs of the licensee often end up being bred and moved to the kennel, or are housed in the kennel, the following guidance should be followed:

- All intact females, capable of breeding, should be listed on APHIS Form 7005
- Pet dogs do **not** need to be tagged; although they should be assigned a tag number on APHIS Form 7005
- The only time there would be a concern about disease transmission would be if the pet dog was sick and was in need of veterinary attention
- The only time there would be a concern about containment is if there was a history of dogs getting hit by cars or injuries related to non-confinement
- Inspectors should discuss with licensees the issues of non-containment and disease transmission, e.g. *Brucella canis*, Parvovirus, etc.

**Barn Cats**
If a licensee has barn cats, i.e., loose cats used as pets and/or for pest control, not for regulated breeding purposes, the barn cats are not covered. Therefore, they do not need to be inspected or follow any of the regulations/standards. However, if the barn cats have a negative effect on the regulated animals, this should be cited.

Examples of negative effects include, but are not limited to:

- Cats getting into the food supply
- Cats contaminating the animals’ food and/or water
- Cats harassing or causing stress to a regulated animal such as in a prey/predator situation
- Sick cats possibly transmitting disease
If the licensee allows the barn cats to have kittens, you should discuss with the licensee what he/she plans to do with the kittens to determine if it would be a regulated activity.

**Facility Inspection—Specific Issue Guidance**

The inspector must develop a consistent method for inspecting facilities that ensure inspections are thorough and accurate. Guidance on specific issues related to facility inspection include:

**Housing Facilities – Indoor, Sheltered or Outdoor**

When determining if a facility is indoor, sheltered, or outdoor, the inspector must assess the facility in a stepwise fashion beginning with the indoor housing definition. If a facility does not meet this definition, then the inspector should next consider the sheltered housing definition. A facility is only to be considered an outdoor housing facility if it “does not meet the definition of any other type of housing…”

If a facility meets the definition of indoor or sheltered, it must be classified as such even if the licensee does not want to meet the standards associated with these types of housing, such as temperature and humidity control. Simply removing the heating system from an indoor or sheltered housing facility does not make it an outdoor housing facility. It simply means that the facility is noncompliant with the standards.

**Indoor Housing**

The AWA regulations define Indoor Housing as: any structure or building with environmental controls housing or intended to house animals that:

1. is capable of temperature control within the limits for species of animal therein, maintaining humidity levels of 30 to 70 percent, and rapidly eliminating odors from within the building; and
2. has a continuous connection of a roof, floor, and walls (a shed or barn set on top of the ground does not have a continuous connection between the walls and the ground unless a foundation and floor are provided); and
3. has at least one door for entry and exit that can be opened and closed (any windows or openings which provide natural light must be covered with a transparent material such as glass or hard plastic).

If a housing facility meets the conditions for all aspects of the definition of “indoor housing facility” except that it is not climate controlled, it is still considered an indoor housing facility under AWA regulations. If the temperature, ventilation, and humidity cannot be controlled as required by the applicable section of the standards, the building should be cited as noncompliant.
An example of an Indoor Housing Facility includes, but is not limited to:

- A shed or barn that has a floor with a continuous connection with the walls and a roof

**Sheltered Housing**

The AWA regulations define Sheltered Housing as: a housing facility which provides the animals at all times with:

1. shelter, and
2. protection from the elements, and
3. protection from temperature extremes.

A sheltered housing facility may consist of runs or pens totally enclosed in a barn or building, or of connecting inside/outside runs or pens with the inside pens in a totally enclosed building.

If a housing facility is capable of meeting all aspects of the definition of a “sheltered housing facility,” it is considered a sheltered housing facility. Even if walls, large doors, or panels are removed for part of the year, it is still considered a sheltered housing facility.

Examples of Sheltered Housing include, but are not limited to:

- A facility consisting of connecting inside/outside pens with the inside pens contained in a building
- A facility with primary enclosures entirely enclosed within a building which is set on top of the ground and does not have a floor which is continuously connected to the walls
- A facility consisting of some enclosures that are fully enclosed within the building AND some enclosures that are connecting inside/outside pens

**Outdoor Housing**

The AWA regulations define Outdoor Housing as: any structure, building, land, or premise, housing or intended to house animals, which does not meet the definition of any other type of housing facility provided in the regulations, and in which temperatures cannot be controlled within set limits.

Examples of Outdoor Housing Facilities include, but are not limited to:

- A facility with outdoor pens that has an open building-like structure with a roof and partial walls over the pens which cannot be temperature controlled
- Hutch-like enclosures in a yard with no protective covering
◆ A chain link enclosure with a dirt floor and one or more dog-house type structures for shelter for the animals

**Lids on Self-Feeders**
Self-feeders may be used for feeding dry food to dogs and cats. The AWA regulations do not require lids for self-feeders. Rather, food for dogs and cats must be uncontaminated, wholesome, palatable, and sufficient in quality and quantity to maintain good health. Food receptacles must also protect food from rain and snow. If the lack of a lid contributed to poor food quality, the lack of a lid may be noted in the citation describing the noncompliance.

**Perimeter Fence—Instances When A Perimeter Fence Is Not Required [3.127(d)]**
A perimeter fence is not required where an outdoor housing facility houses only *farm animals*, and the facility has in place effective and customary containment and security measures, such as standard farm type pens, barns, and fences (9 C.F.R. § 3.127(d)(5)). Farm animals include:

◆ Cattle, sheep, goats, pigs, horses, and donkeys
◆ Mouflons/urials
◆ Llamas
◆ Brahman/zebu cattle
◆ Watusi cattle

A perimeter fence is not required where appropriate alternative security measures are employed and the Administrator (or APHIS) gives written approval affirming a perimeter fence is not required (9 C.F.R. § 3.127(d)(3)).

APHIS maintains standing written approval stating a perimeter fence is not required when members of a hoofstock species meeting the definition of “wild animal” or “exotic animal” (such as alpacas, vicuñas, guanacos, any species of deer, caribou, reindeer, bison, and any buffalo/cattle hybrid) are maintained under agriculture conditions. A facility-specific written approval is not required when a facility holds hoofstock species under agriculture conditions with appropriate alternative security measures (9 C.F.R. § 3.127(d)(3)).

If you come across other species that may not require a perimeter fence because appropriate alternative security measures exist, call your SACS (9 C.F.R. § 3.127(d)(3)).
Perimeter Fence—Open Gate
During times when a zoo is open to the public, there will usually be an opening in the perimeter fence allowing public entry. Most zoos have a ticket booth or attendant between that open portion of the perimeter fence and the animal enclosures or some other method to assure that the animals are safely contained when the zoo is open to the public.

The mere presence of an open entry gate at a zoo is generally not a stand-alone noncompliance. If after review of the entryway, perimeter fence, and the animal enclosures, you have concerns about the containment, especially of dangerous animals, you should cite the perimeter fence or contact your supervisor.

As a performance-based standard, if an incident occurs that involves an opened, unstaffed perimeter fence gate (escape, injury, death, etc.), the fact that an open, unstaffed gate contributed to the incident can be included in the language of the citation, which should be cited under the section that caused the incident.
Miscellaneous Inspection Guidance

Authorized Person Selling Animals
An authorized person (generally listed in Block 9 of the APHIS Form 7003) can represent the licensee during a USDA inspection. Generally, any employee of a dealer, whether so listed or not, may conduct sales of animals owned by that dealer and also may accompany the inspector.

An authorized person may not sell animals he or she owns unless said person has his/her own license. In summary, a licensee (Person A) is not able to legally empower someone else (Person B) to conduct regulated activity without a license. Hence, Person B may not sell his/her own dogs under Person A’s license at any time; this is unlawful.

Field Specialist Consultations
If an inspector has an issue or situation that would benefit from a consult with a Field Specialist, the inspector may contact the Field Specialist. The inspector must inform his/her SACS (by email cc or phone) about consulting with the Field Specialist.

After the initial consultation with the Field Specialist, the inspector and the SACS will determine how further consultation with the Field Specialist should occur, i.e., going through the SACS or the inspector contacting the Field Specialist directly and copying the SACS on any correspondence.

Identification of Unsafe Facility Conditions
Be alert for unsafe facility conditions:

◆ If the condition(s) adversely affects the inspector, he/she must leave the facility.
◆ If not all the animals are safely contained, the inspector must leave the area or facility until it is safe to conduct an inspection.
◆ If the condition(s) is noncompliant with the AWA, cite the noncompliance on the Inspection Report. Examples include, but are not limited to:
  ❖ Bare wiring
  ❖ Electrical wires near water
  ❖ Electrical wires within reach of animals
  ❖ Unprotected heat lamps
◆ If the condition(s) is not something within the AWA regulatory requirements, report the item to the licensee, research facility representative, or an authorized representative at the facility. Examples include, but are not limited to:
General Inspection Procedures
Conducting the Inspection

- Locked emergency exits
- Unlocked or unsecured controlled substances
- If you feel that you are being threatened, abused, or harassed:
  - Leave the facility (see Workplace Violence in the AC Safety and Health Manual), and
  - Document what occurred in a memo to your SACS, including who said what to whom, when, where, and how, using specific language.

If you have additional concerns, contact your SACS, the AC Safety and Occupational Health Manager, and a Safety & Health Committee member or the Safety Officer.

Team Inspections
Under certain circumstances, an inspector, SACS, or Animal Welfare Operations leader may request or require a team inspection. A team inspection may include an ACI, VMO, and/or a Specialist.

A team inspection is required for:
- Next full inspection of a facility with a Direct vet care NCI cited by an ACI. The second inspector must be a VMO.
- Possible confiscation
- Facilities where the licensee/registrant has threatened, abused or harassed the inspector

Other possible reasons for conducting a team inspection include, but are not limited to:
- Focused inspection follow up of a Direct vet care NCI cited by an ACI. Note: The ACI may choose to take a VMO on the inspection.
- Multiple indirect vet care issues
- ACI has concerns about the Attending Veterinarian and/or PVC
- Multiple noncompliances
- Repeat noncompliances
- Large facilities or complex inspections
- Facilities with current IES investigations
- Difficult licensee
- Expertise in a particular species needed
- Training
◆ Complaints, such as multiple complaints against the same facility or the same issue at the facility
◆ Licensee/registrant has a history of appealing NCIs

Be sure all inspectors and Specialists involved are listed in ACIS and in the exit interview statement.

**Action to Take on Noncompliant Item Noted While Off Duty**
If you are off duty and notice a noncompliance at a licensed facility or find an unlicensed exhibitor, you are **not** required to take any action. However, if you choose to take action, suggested actions include:

◆ Assess the severity of the noncompliance
◆ If in your territory, return to the facility when on duty and conduct an inspection or evaluation of the situation
◆ If **not** in your territory, contact your SACS when on duty to determine a course of action
◆ Take appropriate immediate action, if required

**NOTICE**
Remember that you **cannot** work overtime **without** your SACS approval.

If you elect to conduct an inspection or evaluation of the situation, send your SACS:
◆ A memo documenting the situation and the action taken
◆ The Inspection Report, if appropriate

**Life Threatening Situation**
If there is a life-threatening situation, such as a dangerous animal escape, then:

1. Leave the area immediately.
2. Contact facility personnel/management.
3. Call 911, if appropriate.

**Non-Life Threatening Dangerous Situation**
If you believe that the noncompliance results in a non-life threatening but dangerous situation to the animal or the public, speak to the licensee or an authorized representative.

If the licensee does **not** correct the NCI at that time, then:
1. Speak to the management of the venue.
2. Call your SACS, the SOTW, or the Animal Welfare Operations Field Offices’ emergency contact number and discuss a course of action.

3. Contact local authorities, such as the local police or animal control officer, if appropriate, e.g., a non-regulated species is involved.

**No Immediate Danger**
If you believe that the noncompliance results in no immediate danger to the animal or the public, you may choose to:

- Speak to the licensee or authorized representative, or
- Take no action at that time

---

**Completing the Inspection Report**

**General Information**
The inspector **must** complete an official Inspection Report as soon as possible at the end of the inspection. (Remember that Inspection Reports with a Direct NCI must be completed and delivered to the licensee/registrant immediately after the inspection.) The Inspection Report should follow the format of the Inspection Report template in the Animal Care Information System (ACIS).

For information and instruction on how to plan an inspection, enter data, and finalize an Inspection Report in ACIS, refer to the training material provided to you and contact your SACS if you need assistance.

**NOTICE**
Inspection Reports are to be finalized in ACIS, delivered in person, or sent to the licensee or registrant, and submitted to the appropriate Animal Welfare Operations field office **within 5 business days of the date of the inspection**. If an Inspection Report has a correction deadline that is less than 5 business days, the licensee or registrant must receive the Inspection Report prior to the earliest deadline. Exceptions to the 5 day or earliest deadline delivery must be pre-approved by the SACS.

The Inspection Report **must** contain the following general information entered automatically by ACIS:

- Business name
- Customer ID
- Date of inspection
- Licensee, registrant, or applicant’s name as listed on Application for License or Registration
- Mailing address as listed on Application for License or Registration
- Site name, if applicable
◆ Site number or TRA (Traveling on the Road) (see Traveling (TRA) Site) as assigned by ACIS. Make sure that you are in the correct site, and ensure you do not enter an inspection into an inactivated site.

◆ USDA license or registration number (except for prelicense inspections)

If any of the above information is incorrect in ACIS due to a data entry error, such as a misspelled name or transposed address numbers, contact the appropriate Animal Welfare Operations field office to have the information corrected before you complete the Inspection Report.

**Changes in Business Information**

If you arrive at a facility and find that the licensee/registrant is no longer the owner of the facility or the mailing address has changed, i.e., the facility has moved, and the licensee/registrant did not notify AC within 10 days of the change, you should:

◆ Not conduct an inspection because a new license/registration is required

◆ Cite the licensee/registrant for failure to notify AC of the change in business status [2.8, 2.27, 2.30]

◆ Contact your SACS to discuss any further citations, such as, conducting regulated business without a license

For other changes that do not require a new license/registration, inform the licensee/registrant that he/she should contact the appropriate Animal Welfare Operations field office to make the changes.

If you are unsure how to proceed, contact your SACS.

**Type of Inspection**

The Inspection Report must specify the type of inspection conducted. Enter the type of inspection into the ACIS Inspection Report template.

The types of inspections are:

◆ Attempted – situation where an authorized person was not available to accompany the inspector. No inspection was conducted.

◆ Prelicense – inspection to determine compliance with the AWA regulations and standards prior to issuance of a USDA license. Indicate whether 1st, 2nd, or 3rd.

◆ Routine – normal periodic, unannounced inspection including:
  ▶ Complete inspection of the facility
  ▶ New site or additional site inspection (announced)
General Inspection Procedures
Completing the Inspection Report

- A complete inspection to follow up on a public complaint involving animal welfare
- An inspection to determine whether unlicensed activity may be ongoing
- Inspection to lift a suspension if required pursuant to a Consent Decision or Decision & Order. (Note - This may be a scheduled/announced inspection. Consult Regulatory Support Staff.)

- Focused – unannounced inspection including:
  - Reinspection for Direct NCIs
  - Reinspection for a specific NCI or NCIs cited on the previous inspection
  - Partial inspection of the facility, such as animals only or records only
  - A partial inspection to follow up on a public complaint concerning animal welfare

**Inspection Report Narrative**

Refer to Documenting Inspection Findings in Chapter 2 for instructions on documenting inspection findings in the narrative section of the Inspection Report.

**Examples of Citations**

The following pages show examples of noncompliance citations. Develop a consistent method of writing citations.

**EXAMPLE**

*Standard: SECTION 3.1(a) HOUSING FACILITIES, GENERAL*

*Noncompliance:* The roof in the southeast corner of the kennel building is falling in due to rotting wood. Pieces of wood from the roof have fallen into the pen below that houses three adult dogs.

*Why a noncompliance:* The kennel building is not in good repair. The falling roofing material and wood beams could injure the dogs, and result in the dogs being exposed to rain and other weather conditions.

*How to comply:* The roof must be kept in good repair. Maintenance problems need to be identified and fixed in a timely matter to keep the facilities in good repair and protect the animals from injury.

*Correction date:* Correct by *(date)*.
EXAMPLE

**Standard:** SECTION 3.83 WATERING

**Noncompliance:** The water receptacle in the enclosure housing ten adult macaques has a layer of debris and scum floating on the top of the water and a thick layer of algae along the sides.

**Why a noncompliance:** The presence of debris, scum, and algae is an indicator of contamination of the water which can cause illness in the animals.

**How to comply:** All water receptacles should be cleaned and sanitized at least once every two weeks, or more often if necessary, to keep them clean and free from contamination such as dirt, debris, scum, or algae.

**Correction date:** Correct by (date). Ten macaques affected.

EXAMPLE

**Standard:** SECTION 3.104(b)(1)(i) SPACE REQUIREMENTS

**Noncompliance:** Two beluga whales housed in the “old pool” require a Minimum Horizontal Distance (MHD) of 28 feet. The pool only provides an MHD of 25 feet.

**Why a noncompliance:** The proper MHD is required for the whales to ensure adequate freedom of movement and to make normal postural and social adjustments.

**How to comply:** Measures must be taken to provide the required MHD for the whales.

**Correction date:** Correct by (date).
**EXAMPLE**  
*Standard:* Section 3.125(a) FACILITIES, GENERAL  

*Noncompliance:* The enclosure housing three adult tigers has a wire panel next to the den which has a broken wire. The ends of the broken wire have sharp edges and are protruding into the enclosure.

*Why a noncompliance:* The tiger enclosure is not being kept in good repair which could result in the tigers being injured by the sharp points on the wire.

*How to comply:* The wire should be repaired or replaced. Maintenance problems must be identified and fixed in a timely manner to keep the facilities in good repair and protect the animals from injury.

*Correction date:* Correct by (date).

**EXAMPLE**  
*Multiple Sections and Multiple Species:* If an NCI involves multiple sections of regulations/standards and multiple species, each section of the regulation/standard must be cited separately.

For example: A food storage room used to store food for guinea pigs, rabbits, nonhuman primates, and wild/exotic animals is cluttered, dirty, and has broken bags with food spilling on the floor, and the unopened bags of nonhuman primate food are stored directly on the floor and up against the walls.

Sections 3.25(c), 3.50(c), 3.75(e), and 3.125(c) –STORAGE OF FOOD would be in noncompliance. Each of these sections should be cited for the species affected.

**EXAMPLE**  
*Multiple Noncompliances under one Section and Subsection:* If multiple noncompliances involve one section and subsection of the regulations/standards, these NCIs may be grouped together.

For example, for farm animals in a petting zoo:

- The roof of the barn has an opening which allows rain and snow to fall into the pens.
- The partition between the sheep pen and the food storage area has numerous holes.
- The front gate of the calf pen has a broken hinge and does not close properly.

SECTION 3.125(a)–STRUCTURAL STRENGTH would be in noncompliance and all three items could be cited together.
**EXAMPLE**  Multiple Noncompliances under the Same Section but Different Subsections: If multiple noncompliances involve the same section but different subsections, each NCI must be cited separately.

For example, for nonhuman primates: There are multiple NCIs of SECTION 3.80 PRIMARY ENCLOSURES—General Requirements

- SECTION 3.80(a)(2)(i)–A pen housing four spider monkeys has broken wire mesh flooring in the right rear corner with sharp wire ends sticking up into the pen.
- SECTION 3.80(a)(2)(vii)–There is no shade area in the outdoor nonhuman primate exhibit and it is summer with ambient temperatures over 100 °F.
- SECTION 3.80(a)(2)(ix)–A pen housing four baboons has wooden walls with all the paint scratched off so that the walls can no longer be properly cleaned and sanitized.

Each of these should be a separate citation.

**Information Inspectors Should Not Include in the Narrative**
The narrative section should not contain:

- Administrative messages to the Animal Welfare Operations field offices
- Animal inventory except for names of elephants
- Comments on public complaints
- Date of last inspection
- Personal comments about the facility
- Personal or proprietary information, such as
  - Addresses, other than the licensee/research facility mailing and/or business address
  - Driver’s license numbers
  - Names of animal handlers
  - Names of buyers of animals
  - Name(s) of person(s) accompanying you on the inspection, except for other AC personnel
  - Names of principle investigators or research facility personnel
  - Names of sellers of animals
  - Social security numbers
  - Sources of animals
  - Telephone numbers, other than your contact information, if applicable
Recommended enforcement action

**NOTICE**

Remember that the Inspection Report is a legal document that may be used by our Office of General Counsel (OGC) as evidence in a court proceeding. The Inspection Report is a public document and is available to the public through a Freedom of Information Act request or viewed via the Internet at the Animal Care website.

**Repeat Noncompliant Item Identified**
Refer to Repeat NCI in Chapter 2 for information on Repeat noncompliant items.

**Direct Noncompliant Item Identified**
Refer to “Direct” NCI Identified in Chapter 2 for information on Direct noncompliant items.

**Critical Noncompliant Item Identified**
Refer to “Critical” NCI Identified in Chapter 2 for information on Critical noncompliant items.

**Noncompliant Item with Correction Time Remaining**

**Focused Inspection**
If you are conducting a “focused” inspection, such as follow up on a Direct or Repeat NCI, and there are previously identified uncorrected NCIs which still have correction time remaining, do not re-cite or mention these NCIs on the Inspection Report. These are not repeat NCIs. Be sure to specify that this was a focused inspection in the Inspection Report Inspection Type and narrative.

**Full Inspection**
If you are conducting a full inspection and there are previously identified uncorrected NCIs which still have correction time remaining, do not re-cite these NCIs. Note on the Inspection Report that the NCIs have not been corrected, but that the correction date has not passed. These are not repeat NCIs.

**No Regulated Animals Present**
Even though there may be no regulated animals present at a facility, an inspection may still be conducted.

Factors to consider when deciding whether to inspect a facility include, but are not limited to:

- Are there areas of the facility that you have never inspected before, e.g., a new building?
◆ Are there records to inspect?
◆ Are there transportation vehicles to inspect?
◆ Does this facility have a history of noncompliance?
◆ Even though there are no animals currently at the facility, do regulated animals go in and out of the facility, such as a traveling petting zoo?
◆ Is the facility due for an inspection?
◆ Is this a new facility added to your territory?
◆ Is this an active research registrant that has not been inspected this fiscal year?

After using your best judgment and determining that there is nothing to inspect, you may choose not to conduct an inspection.

If you conduct an inspection:
◆ Classify the inspection as “Routine”
◆ Cite only NCIs (or document as a teachable moment, as appropriate) found during the inspection if the area with the noncompliance:
  ❖ is currently in use, but no animals are there on the day of your inspection, or
  ❖ is ready for use
◆ For the correction date, use the following or a similar statement: “Correct before being used for animals regulated by the Animal Welfare Act.”
◆ If a partial inspection, state which areas were inspected, such as records and/or specific buildings
◆ State in the narrative, “No regulated animals present at this time.”

If you do not conduct an inspection:
◆ Do not complete an Inspection Report.
◆ Send a memo to your SACS explaining why you did not conduct an inspection.
Finalizing the Inspection Report

After you have (1) reviewed the inspection findings with the licensee/registrant/applicant, (2) given the facility representative the opportunity to provide additional information pertinent to the findings, and (3) checked the Inspection Report for accuracy, finalize the report in ACIS before delivering a copy to the licensee/registrant/applicant. (For additional information and instruction, refer to the ACIS Guidance.)

**NOTICE**

You do **not** have to completely finalize an Inspection Report for a specific site to do an Inspection Report for another site of the same licensee or registrant.

**Action to Take When a Person, Facility, or Site is Not in the ACIS Database**

If the person, facility, or site is **not** in the ACIS database:

- Complete the Inspection Report using the Word Inspection Report Template, have an authorized person sign the Report, and follow the procedures for Handwritten Inspection Reports in Chapter 2, **OR**
- If you have Internet access:
  - After the inspection, contact an Inspection and Licensing Assistant (ILA) or the Program Specialist (PS) at the Animal Welfare Operations field office.
  - Provide the ILA/PS the following information:
    - Licensee/registrant/applicant/owner’s full name, if applicable
    - CID Number, if applicable
    - Complete mailing or business address, if needed
    - Complete site address, if adding a new site
    - County, if known
    - Business telephone number, including area code
  - Obtain the customer number, if available
  - After the ILA/PS has updated ACIS, enter the Inspection Report into ACIS.
  - After you have reviewed the inspection findings with the licensee/registrant/applicant/owner, and checked the Inspection Report for accuracy, finalize the report in ACIS before delivering a copy to the licensee/registrant/applicant/owner.
Traveling (TRA) Site
A traveling site is a temporary animal location, housing, or exhibit area, such as:

◆ A city where the licensee is performing
◆ An airport
◆ An auction market

On the Inspection Report:
1. Make sure that you use the “traveling-on-the-road” (TRA) site designation in ACIS.
   A. If the licensee does not have a TRA site already in ACIS, follow the procedures for Action to Take When a Person, Facility, or Site is Not in the ACIS Database.
   B. If the licensee has more than one TRA site, use the correct TRA site if it is in ACIS.
2. Add the exact location of the inspection, such as address, name of the mall, building, or fairground, and always include the city and State, in the narrative section of the Inspection Report.
3. Add the name of the Unit, if applicable, in the narrative section of the Inspection Report.
4. If the exhibitor is part of a larger circus or traveling group, add the name of the circus or group in the narrative section of the Inspection Report.

Correction Date
A correction date is the time period in which a noncompliant item must be corrected. Include an actual date with the citation; do not use the term “immediately.”

A correction date should be:
◆ Appropriate to the severity of the NCI
◆ Determined with the concurrence of the licensee/registrant or authorized representative, if appropriate
◆ Realistic as to what the facility can accomplish

NOTICE
If the Inspection Report is being sent by certified mail, allow for the mailing time when setting the correction date.
A correction date is given for:

- Newly identified “Direct” NCIs. Give these NCIs a short correction period, e.g., by close of business on (date), within 72 hours, within 10 days. The correction date for direct NCIs should never exceed 14 days.

**NOTICE**

Reinspect for correction of a “Direct” noncompliant item no later than 45 days after the date of inspection.

- Newly identified “Indirect” NCIs. If reasonable with respect to the welfare of the animals involved, an inspector can allow up to 1 year for some corrections.

For NCIs corrected prior to the inspection:

- The inspector may decide, using his/her own discretion, whether or not to cite the NCI. If cited, add “Ensure corrective actions are properly followed.”, and do not give a correction date.

For NCIs corrected during to the inspection:

- The inspector may decide, using his/her own discretion, whether or not to cite the NCI. If cited, add “Corrected during the inspection.”, and do not give a correction date. Documenting this NCI may be necessary to show the facility’s history of compliance.

A correction date is not given for:

- Airline transportation non-compliances
- NCIs identified on a Prelicense Inspection
- NCIs cited on a New Site inspection Approval inspection, except for a Direct NCI
- Repeat noncompliant items

**Extension of Correction Date**

An extension is an additional amount of time to correct a noncompliant item granted through an Animal Welfare Operations field office.

A licensee/registrant may request an extension if he/she will not be able to correct the NCI by the correction date.

At the time of the inspection, if a licensee/registrant anticipates that an extension will be needed because you cannot agree on a correction date or the licensee/registrant wants more than one year, explain to him/her how to request an extension.
An extension request, whether anticipated or unexpected, must be:

1. In writing
2. Appropriate, i.e., only for indirect NCI related to facility maintenance
3. Specific as to the reason/justification for the request

**EXAMPLE**

- Unexpected delays during the correction process, such as budget or severe weather delays
- Unforeseen special circumstances that prevent completion, such as death or serious illness in the family

4. Sent to the appropriate Animal Welfare Operations field office (Raleigh or Fort Collins)
5. Received by the Animal Welfare Operations field office prior to the original correction date

**Processing of the Extension of Correction Date Request**

Take the following actions to process the extension of the correction date request:

1. The Animal Welfare Operations field office will send the extension request to the appropriate SACS.
2. SACS will review and discussion with the inspector, if necessary.
3. SACS will write the letter informing the licensee/registrant whether or not the extension was granted.
4. SACS will send letter to the Animal Welfare Operations field office.
5. The Animal Welfare Operations field office will send letter to the licensee/registrant.

**Inspection Appeals Process**

If the licensee/registrant has a concern about any findings on the Inspection Report, he/she may use the inspection appeals process to resolve the dispute.
Prior to Finalizing the Inspection Report
If a licensee/registrant/facility representative has questions or concerns about a noncompliant item(s) cited on the Inspection Report, the inspector should explain why the noncompliance was cited and give the facility representative the opportunity to provide additional information pertinent to the findings at the exit interview (see Exit Interview in Chapter 2). If the concern is resolved, change the citation. If the concern cannot be resolved:

1. Inform the licensee/registrant/facility representative of the next step in the appeals process.
2. Give the licensee/registrant/facility representative a copy of the Appeals Process Factsheet.

If there was an unresolved disputed noncompliance:

◆ Photograph any NCI that the licensee/registrant is going to appeal or likely to appeal (see Inspection Photographs in Chapter 2).
◆ Finalize the Inspection Report.
◆ Inform your SACS that there may be an appeal of a noncompliance item(s) cited on the Inspection Report.

After Finalizing the Inspection Report
If a licensee/registrant/facility representative has questions or concerns about a noncompliant item(s) cited on the Inspection Report, meet with the licensee/registrant/facility representative, if requested, to discuss the noncompliance.

If you and the licensee/registrant/facility representative resolve the disagreement on the noncompliance:

◆ Generate an amended Inspection Report and inform your SACS of the resolution.
◆ Give or send (by an acceptable method) a copy of the Inspection Report AND the Amended Report Letter to the licensee/registrant.
◆ Send a copy of the amended Inspection Report and Letter to the appropriate Animal Welfare Operations field office.

If the dispute cannot be resolved:

◆ Inform the licensee/registrant/facility representative of the next step in the appeals process.
◆ Give the licensee/registrant/facility representative a copy of the Appeals Process Factsheet.
◆ Photograph any NCI that the licensee/registrant is going to appeal or likely to appeal, if possible.
Inform your SACS that there may be an appeal of a noncompliance item(s) cited on the Inspection Report.

If the licensee/registrant’s appeal of a noncompliance is determined to be **valid**, i.e., a citation is modified or deleted, the original Inspection Report will be rescinded in ACIS by the Animal Welfare Operations field office and a new draft Inspection Report will be generated for the inspector to amend.

If the licensee/registrant’s appeal of noncompliance is determined to be **invalid**, the Animal Welfare Operations field office will write a letter to the licensee/registrant/facility representative informing him/her of the decision. The inspector will receive a copy of the letter.

**NOTICE**

Inspection appeals should **not** delay reinspection of Direct noncompliances or interfere with efforts to ensure that the immediate welfare needs of the animals are met.

**Amended Inspection Report**

The amended Inspection Report should:

1. Be dated the date that the actual inspection was conducted in “Inspection Date” block
2. Be dated the date that the amended Inspection Report was signed and sent to the licensee/registrant in the “Signature Block”
3. Cite any noncompliances that were modified on appeal
4. Cite the noncompliances that were **not** appealed or overturned on appeal

**NOTICE**

The unchanged citation(s) on the amended Inspection Report **must** be identical to the citation on the original Inspection Report.

Do **not** put a statement on the Inspection Report that this was an amended Inspection Report.

The inspector should send a copy of the amended Inspection Report **AND** the Amended Report Letter to the:

- Licensee/registrant by email or certified, return receipt mail
- Animal Welfare Operations field office

**Mistakes on the Inspection Report**

Read the Inspection Report carefully before printing and finalizing to ensure that all information and spelling are correct.
Incorrect customer ID, date of inspection, site name (001, TRA), USDA license or registration number, requires rescinding the Inspection Report, correcting the error, and sending the licensee/registrant an amended report with an Amended Report Letter.

**Prior to Printing the Final Inspection Report**

To make the Inspection Report as accurate as possible, ensure that:

1. You are entering the inspection:
   - A. Under the correct licensee/registrant
   - B. Under the correct certificate number
   - C. In the correct site
2. All information is entered into the database correctly, such as:
   - A. Inspection type
   - B. Name and title of person signing the Inspection Report
3. All information in the narrative is correct, such as:
   - A. Citation Section and subsections
   - B. Buildings/locations inspected, if appropriate
   - C. Location of inspection of a TRA site
   - D. Names of elephants inspected
4. The narrative section uses the appropriate wording to describe the problem.
5. Repeat NCIs are the same section/subsection cited on the previous inspection(s).
6. Check spelling and grammar and review a draft copy of the Inspection Report with the licensee/registrant/facility representative.
7. Make the appropriate changes, if necessary, and print the Inspection Report for a signature.

**BE SURE TO FINALIZE THE INSPECTION REPORT.**

**Major Errors**

If a major error is noted on the Inspection Report after the final copy has been printed or the Inspection Report has been finalized, it **must** be corrected.
Major errors include, but are not limited to:

- Correction date given for a Repeat noncompliance
- Correction date(s) omitted
- Exit interview statement not included
- Incorrect citation
- Incorrect inspection type
- Wrong site

**NOTICE**

Spelling or grammatical errors are not considered major errors.

**Correcting or Amending the Inspection Report**

No pen and ink changes may be made to the Inspection Report.

If a major error(s) is noted after the Inspection Report has been finalized, and a copy of the Inspection Report has not been given to the licensee/registrant/facility representative:

1. Contact your SACS or SOTW if your SACS is not available to have the Inspection Report reset to draft.

   **NOTICE**

   You must upload the Inspection Report into ACIS before it can be reset to draft.

2. Correct the draft Inspection Report.

3. Provide a copy of the corrected Inspection Report to the licensee/registrant/facility representative through the usual delivery methods.

If a major error(s) is noted after the Inspection Report has been finalized and a copy of the Inspection Report has been given to the licensee/registrant/facility representative:

1. Notify your SACS to have the original Inspection Report rescinded.

2. Enter a new Inspection Report into ACIS.

3. Provide a copy of the corrected Inspection Report AND the Amended Report Letter to the licensee/registrant/facility representative through the usual delivery methods.
General Inspection Procedures
Completing the Inspection Report

The new Inspection Report must:

1. Be dated the date that the actual inspection was conducted in “Inspection Date”
2. Be dated at the bottom the date that the amended Inspection Report was:
   A. “Prepared” by you, and
   B. Signed by or sent to the licensee/registrant

**NOTICE**

These dates do **not** have to be the same.

3. Correct the major mistake for which the amended Inspection Report is being generated.
4. Cite the noncompliances that were correct on the original Inspection Report.

**NOTICE**

The citations **must** be identical to the citation on the incorrect Inspection Report.

Do **not** put a statement or any reference on the Inspection Report that this was an amended Inspection Report.

**Mistakes Noted by the Animal Welfare Operations Field Office**

If the Animal Welfare Operations field office discovers a mistake on an Inspection Report:

1. The inspector and the SACS will be notified.
2. The inspector **must** correct the Inspection Report following the procedure outlined in Correcting or Amending the Inspection Report.
3. The inspector **must** deliver the amended Inspection Report to the licensee in person or send by email or certified, return receipt mail within **2 weeks**.

**Handwritten Inspection Reports**

There are certain situations where the inspector may choose to, or **must**, hand write the Inspection Report, including but not limited to:

- Airports where it is difficult to get a computer through security
- Computer failure
- Printer failure
- Unique situations which may arise where the use of the computer is not feasible
If you hand write an Inspection Report, use the blank pre-printed Inspection Report form. Always have a supply of blank pre-printed Inspection Reports, either with you, or in the government vehicle.

When using the pre-printed Inspection Report:
◆ Hand write all information legibly and neatly.
◆ Use black or blue ink.

If you want to give the licensee/registrant/facility representative a copy of the handwritten Inspection Report at the time of the inspection, either make a photocopy, or complete two reports and sign both copies.

If you do not give the licensee/registrant/facility representative a copy of the handwritten Inspection Report at the time of the inspection:
◆ Enter the Inspection Report in ACIS as instructed
◆ Send a copy of the ACIS Inspection Report to him/her as instructed

REMEMBER:
◆ You must enter the handwritten Inspection Report into the ACIS database as soon as possible.
◆ The narrative entered into the ACIS database must be identical to the handwritten Inspection Report.

NOTICE
Dates of the actual inspection, Prepared, and Received may be difference due to the automatically generated prepared date in ACIS. You must correct the date of the actual inspection. You do not need to correct the Prepared and Received By dates even if the licensee/registrant has a copy of the handwritten Inspection Report.

◆ Do not put a statement that this is electronic or transcribed version of the original Inspection Report.
◆ If the licensee/registrant does not have a copy of the handwritten Inspection Report, then send a copy of the ACIS Inspection Report to the licensee/registrant by email or certified, return receipt mail.
◆ If the licensee/registrant does have a copy of the handwritten Inspection Report, then you do not need to send a copy of the ACIS Inspection Report.
◆ Attach a copy of the ACIS Inspection Report to the handwritten Inspection Report, and,
◆ Send the handwritten Inspection Report and ACIS copy to the appropriate Animal Welfare Operations field office.
In the case of a printer failure, send a copy of the report to the licensee/registrant/applicant by email, certified, return receipt mail when the printer is repaired.

**Nonregulated Animals**

Nonregulated animals should not be inspected or mentioned on the Inspection Report unless there is potential for a negative effect on the health or well-being of the regulated animal(s).

**EXAMPLE**

Examples of a potential negative effect are:

- A horse is chasing a deer in a pasture and causing the deer stress or injury
- Rats with an infectious disease are housed in the same room with rabbits
- Ten peafowl are roosting over the animal feed containers and contaminating the food with feces
- The number of nonregulated animals is so large that the current staffing is inadequate to properly care for the regulated animals

---

**Safety and Ethics Issues**

**Bribery Reporting Procedures—Inspector’s Responsibility**

If you are offered a bribe, or perceive that you are being offered a bribe, refuse the bribe and report it immediately to the Office of the Inspector General (OIG). **Do not report the bribe to your supervisor.**

It is your duty to report being offered a bribe, or if you perceive that you are being offered a bribe.

Follow these steps if you are offered a bribe, or perceive that you are being offered a bribe:

1. **Do not take the bribe.** Say, “I cannot do that.” Do **not** discuss the bribe offer any further, and do **not** tell the person who offered it that you are going to report it to law enforcement or other authorities.

**SAFETY**

If you believe that you are in any danger at this time, leave the facility as quickly and safely as possible.

If you do **not** believe that you are in danger, then assess the situation and use your judgment as to what to do, since you do **not** want the person to think that you are going to report the incident to the authorities. Some possible courses of action include, but are **not** limited to:

A. Give the person a plausible excuse and leave the facility.
B. Complete the inspection or exit interview quickly, but not suspiciously so.

C. Complete the inspection, then tell the person that you are going to complete the Inspection Report off site.

2. At the first practical moment after you are out of sight and earshot of the person who made the offer, and as soon as privacy permits, telephone the OIG using one of the following phone numbers:

A. (202) 720-7257 – 24 hour direct line to OIG, Washington, DC, for reporting threats, assaults, and bribery attempts, or

B. (800) 424-9121 – OIG Hotline for reporting fraud, waste, and abuse, or

C. (202) 690-1622 – Commercial hotline

Note: Collect calls are accepted.

3. Follow the instructions given to you by the OIG Special Agent. An OIG Special Agent will respond to your telephone call. Based on information that you provide, OIG Agents will evaluate the alleged bribery attempt to determine the appropriate investigative action. OIG needs your full cooperation.

4. Do not report the bribery attempt to your supervisor or discuss it with anyone else unless instructed to do so by an OIG Special Agent. Any discussions could compromise the investigation. OIG will ensure that appropriate supervisory personnel are notified in a manner which will not prejudice the investigation.

5. Any subsequent contacts or communication between you and the person who offered the bribe will be controlled and monitored by the OIG.

6. Do not be afraid to cooperate with investigators. Even though you would not accept a bribe, it is your duty to report such matters and to cooperate fully with investigators to prevent further bribery attempts to you or other USDA employees.

**Bribery Reporting Procedures—Supervisor’s Responsibility**

If an employee reports an offer or a perceived offer of a bribe to you:

1. Instruct the employee to call OIG immediately, if he/she has not already done so.

2. Do not discuss the bribery attempt any further with anyone, including the employee.

3. Do not attempt to investigate the incident.

**Gifts From Licensee/Registrant**

Do not accept any “gifts” from licensees or registrants greater than the value of a soft drink or cup of coffee. You do not want any perception of impropriety.
Interference with the Inspection
A licensee, applicant, research facility representative, or other person must not interfere with, threaten, abuse, or harass any APHIS official in the course of carrying out his/her duties.

If you believe that any person at the facility is interfering with the inspection process:

◆ Tell him/her to stop if it is safe to do so.
◆ If the behavior continues or you feel unsafe, leave the facility.
◆ Contact your SACS.
◆ Document what occurred in a memo to your SACS, including who said what to whom, when, where, and how, using specific language.

For more detailed information on Interference, see Chapter 2 and the AC Field Safety and Health Manual.
Chapter 4

Specific Types of Inspections

Contents

Animal Prize Exhibitor Inspection 4-4
   Definition 4-4
   Exemption 4-4
   Conducting the Inspection 4-4
   Records 4-4
Animal Rides 4-6
   Criteria 4-6
   Conducting the Inspection 4-6
Auction Market Inspection 4-8
   Criteria 4-8
   Records 4-9
Barrier Facility Inspection 4-10
   Criteria 4-10
   Alternative Methods of Inspection 4-11
   Refusal of Inspection 4-12
Change in Class of License Inspection 4-13
   Criteria 4-13
   Conducting the Inspection 4-13
Complaint Inspection 4-15
   Sources of Information 4-15
   Information Follow-Up 4-16
   NCI Noted While Off-Duty 4-17
Dead Animal/Parts or Serum/Blood Dealer Inspection 4-17
   General Information 4-17
   Species Specific 4-18
Dogs and Cats in Residence Inspection 4-22
Drive-through Zoo Inspection 4-23
   Conducting the Inspection 4-23
Inactive Research Facility or Research Facility with No Activity for Two Years—Inspection 4-24
   Inactive Research Facility 4-24
   Research Facilities with No Regulated Activity for Two Years 4-25
   Inspection Frequency 4-25
   Inspection Procedures 4-25
Lion and Tiger Enclosure Heights and Kick-Ins Inspection 4-26
   Under Review 4-27
   Compliant Requiring No Further Action 4-28
   Noncompliant Prompting a Citation 4-28
Specific Types of Inspections

Contents

Completing the Checklist 4-28
Field Specialist Review 4-29
Subsequent Inspections of Reviewed Enclosures 4-29
Pet Store Inspection 4-30
  Criteria 4-30
  Record Requirements 4-31
  Exemption 4-31
Petting Zoo Inspection 4-31
  Inspection Procedures 4-32
  Traveling Petting Zoo Itinerary 4-34
Photo Shoot Inspection 4-36
  Types of Photo Shoots 4-36
  Conducting the Inspection 4-36
Random Source Dog and Cat Dealer Inspection 4-37
  Definition 4-37
  Acceptable Procurement Sources 4-37
  Unacceptable Procurement Sources 4-37
  Holding Period for Pounds, Shelters, and Research Facilities 4-37
  Records 4-38
  Tracebacks 4-39
  Special Circumstances 4-45
  Certification 4-46
Research Facility Operating a Pound or Shelter 4-47
  Physically Separate Businesses 4-47
  Records 4-47
Search Inspection 4-49
  Subjects of Searches 4-49
  Sources of Information 4-49
  Information Follow-Up 4-50
  Conducting the Search 4-51
  Post Search Procedures 4-53
  Follow-Up Procedures 4-55
  On the Road Inspection 4-55
  Home Base or Permanent Site 4-57
  Final Preliminary Inspection 4-58
Traveling Exhibitor Inspection 4-58
  General Information 4-58
  Admission to the Venue 4-58
  Conducting the Inspection 4-59
  General Inspection Requirements 4-59
  Animals in Transit 4-65
  Animal Races 4-65
  Animal Rides 4-67
  Circus and Performing Animal Inspections 4-67
  Petting Zoos 4-70
Specific Types of Inspections

Contents

Photo Shoots 4-70
Inspection Reports 4-70
Itinerary 4-70

DISCLAIMER
The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, the AC Policy Manual, the Required Inspection Procedures, standard procedures, or the inspector’s professional judgment. All inspection decisions must be justified by applicable sections of the regulations and standards.
Animal Prize Exhibitor Inspection

An exhibitor who gives away regulated animals as prizes, such as at a fair or carnival, must meet all applicable regulations and standards, including the transportation standards.

Definition
Typically, these are carnival games giving away small mammals to attract people to play the game. The small mammals usually given as prizes include:

◆ Gerbils
◆ Guinea pigs
◆ Hamsters
◆ Rabbits

NOTICE
If you find an exhibitor giving away regulated animals other than small mammals, contact your SACS.

Exemption
Churches, clubs, or civic organizations raffling an animal as a fund raiser are not required to have a license.

Conducting the Inspection
When inspecting the exhibitor on the road, some items to evaluate include, but are not limited to:

◆ Animal housing during exhibit
◆ Animal housing when not on exhibit
◆ Food storage
◆ Handling of the animals
◆ Protection of animals from heat, sun, or inclement weather
◆ Transport cages and transport vehicle
◆ Watering and water availability

Records

Acquisition Records [2.75(b)(1)]
Acquisition records of all animals must contain the following:

◆ Complete address of the seller/donor
◆ Date animal was acquired
Specific Types of Inspections
Animal Prize Exhibitor Inspection

- If seller/donor is *not* USDA licensed or registered, then:
  - Vehicle license number and State of issuance, and
  - Driver’s license number and State of issuance, or
  - State-issued photographic ID card number for non-drivers and State of issuance (see below)
- Name of the seller/donor
- Number of animals in the shipment, if applicable
- Species
- USDA license or registration number if seller/donor is USDA licensed or registered

If vehicle license number and driver’s license number or photographic ID card number *cannot* be obtained, the acquisition record should contain:
- An acceptable reason for *not* obtaining this information, and
- At least two of the following:
  - Directions to the premises of the seller/donor
  - Phone number

**Disposition Records [2.75(b)(1)]**
Disposition records of all animals *must* contain the following information:

- Date animal(s) was given away or disposed of, including euthanasia
- Number of animals
- Species

**NOTICE**
The name and address of the person receiving the animal is *not* required.

The APHIS Form 7019–Record of Animals on Hand (Other than Dogs and Cats) on page A-25 or APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats) on page A-29 may be used to record and maintain the required information.

Acquisition and disposition records *must* be held and available for inspection for 1 year after an animal is disposed of or euthanized. [2.80, 2.126(a)(2)]

These records *must* be kept and maintained for more than 1 year if: [2.80(b)]
- Necessary to comply with any applicable Federal, State, or local law
Specific Types of Inspections
Animal Rides

◆ The APHIS Administrator notifies the exhibitor in writing that specified records must be retained pending completion of an investigation.

Animal Rides

An exhibitor who uses regulated animals to give rides to the public must meet all applicable Animal Welfare Act regulations and standards.

Criteria
Examples of animals used to give rides are:

◆ Camels
◆ Cattle
◆ Elephants
◆ Llamas

NOTICE
Domestic equine species (horse or pony) are exempt.

Conducting the Inspection

When inspecting animals used for rides, make sure that the exhibitor meets all the applicable regulations [9 CFR Sections 2.40, 2.50, 2.75, 2.78, 2.80, 2.125, 2.126, 2.130, 2.131], and all the standards, including the transportation standards, for the animals being used.

When conducting your inspection, some suggested areas to pay attention to include, but are not limited to:

◆ Animal’s locomotion, gait, and uniformity of stride
◆ Animal’s physical condition and behavior
◆ Appropriateness of the weight load for the animal
◆ Attentiveness of the handler during the ride, i.e., is the handler distracted in some manner and not paying attention to their duties
◆ Availability of drinking water
◆ Availability of shade
◆ Condition of the equipment, i.e., no sharp edges, no broken straps, buckles, or fasteners, padding not thin or excessively worn
◆ Plan to provide veterinary care if an animal is injured away from the home facility
◆ Foot care, especially elephants
Specific Types of Inspections
Animal Rides

◆ Number of personnel, i.e., are there enough personnel to watch for dangerous behaviors from the animals, the riders, and the viewing public

◆ Perimeter fence and/or barriers between the animals and the general viewing public

◆ Proper fit of saddles, riding equipment, halters, or restraint devises. Some signs of improper fit include:
  ❖ Abrasions
  ❖ Hair loss
  ❖ Irritated skin
  ❖ Redness
  ❖ Sores

◆ Rest for animals between rides and overnight

**NOTICE**

*Animals must be allowed a rest period equal to the amount of time that they were giving rides.* [2.131(b)(2)]

◆ Training and handling experience of the handlers and employees

◆ Willingness of the animal to work

**NOTICE**

Put the name of the elephant(s) on the inspection report.
Auction Market Inspection

The auction market operator is responsible for compliance with all applicable regulations and standards. [9 CFR Sec. 2.76]

Criteria

At the time of the prelicensing inspection(s) of the auction facility, the inspector ensures that the applicant/auction operator understands all the applicable regulations and standards emphasizing the following:

◆ A species-appropriate containment area, such as a fence or barrier, is required around the loading and unloading area to prevent the escape of the animals.
◆ All animals must be held in a manner that ensures the safety of the animals and the public.
◆ Animals may not be housed close to other animals that may cause them stress.
◆ Incompatible animals must not be held in the same enclosure.
◆ Requirements for record keeping, transportation, cleaning, sanitation, and general animal health and well-being are monitored and enforced during the auction.
◆ The animal enclosures meet the space requirements:
  - If an animal arrives and leaves the auction on the same day, the transport enclosure space requirements apply.
  - If an animal stays overnight at the auction facility, the permanent enclosure space requirements apply.
◆ The auction operator is responsible for compliance with all regulations and standards, including applicable transportation standards, once the animal is accepted by the auction market.

At the time of the auction, you (the inspector) should:

1. Contact the licensee or his/her representative at the facility.
2. Introduce yourself.
3. Show official ID, if requested.
4. Ask the licensee or representative if:
   A. He/she or a designated person should accompany you around the auction grounds, or
   B. If it is permissible for you to inspect the grounds and the sellers/buyers on your own.
5. Check for regulated animals.

6. If a USDA licensee brings in a regulated animal, conduct an inspection of the animal in transit.

7. If an unlicensed person brings in a regulated animal:
   A. Inform the person of the Animal Welfare Act licensing requirements and regulations.
   B. Give the person an application packet, if appropriate.

8. Answer any applicable questions.

9. Check the animals for any visible signs of illness or distress (see Animals Requiring Veterinary Care).

10. If a licensee purchases and transports a regulated animal, conduct an inspection of the animal in transit prior to the licensee leaving the auction facility, if possible.

## NOTICE

If a noncompliant item is noted at the time of consignment, inform the auction operator or representative of this noncompliance.

### Animals Requiring Veterinary Care

The auction operator is responsible for obtaining veterinary care for sick animals in his/her custody.

If a licensee has transported a sick animal, he/she should be cited for this noncompliance.

### Records

#### Sale Day

Ensure that licensees who have transported dogs, cats, and nonhuman primates across a state line have health certificates. The auction operator is **not** required to maintain a copy of these records.

#### After the Sale Day

Conduct an inspection of the records containing all the information for the animals consigned to and sold by the auction operator on a different day than the sale day.

#### Acquisition Records Follow-Up

A person consigning a regulated animal to an auction market may or may **not** require a USDA dealer’s license.
Consignment of regulated animals to an auction is not sufficient cause alone for requiring a license, since the consignor may be exempt from licensing under Section 2.1(a)(3) of the regulations.

Sales of wild or exotic mammals other than those exempted in Section 2.1(a)(3) require a license.

The inspector should:

1. Collect the names/addresses of persons consigning regulated animals to the auction.

2. As time permits, conduct a search of any person in your area selling regulated animals to determine if he/she is conducting any regulated activities.

3. Send sales information for unlicensed persons not in your area to the appropriate SACS or inspector.

**NOTICE**
The auction catalog is a good source for this information and should be obtained, if available.

**NOTICE**
If you (the inspector) do not attend the auction, inspect the records as a routine inspection.

### Barrier Facility Inspection

Animals housed in a barrier facility must be maintained in accordance with all Animal Welfare Act regulations and standards. Barrier facilities can include but are not limited to quarantine/isolation areas, areas conducting research with infectious agents, areas housing animals that are Specific Pathogen Free (SPF) or gnotobiotic.

**Criteria**
The inspector must have access to inspect all regulated animals at a licensed barrier facility to ensure compliance.

If it is not possible for the inspector to enter the animal rooms in the barrier facility due to the possibility of disease exposure and/or contamination of the inspector or the animals, the inspection may be conducted by:

- Analyzing environmental records.
- Selecting random animals to be visually inspected
- Video viewing from outside the barrier room
- Visual inspection through an adequate viewing window
Entry into the Barrier Facility
The inspector may enter the barrier facility if he/she determines that entry is necessary to adequately complete the inspection and/or resolve a suspected problem.

The inspector should follow the entry procedures normally used by the facility’s personnel.

**NOTICE**
The facility should supply a copy of its barrier entry procedures upon request.

The facility should:
◆ **Not** require more stringent entry standards for the inspector
◆ Provide the protective clothing and supplies needed to complete the inspection, such as pen, paper, flashlight, etc.

The facility may ask the inspector to verify that he/she has not been in contact with, or exposed to, certain animals for a specified period of time, generally 72 hours. This verification is acceptable.

**NOTICE**
Do not sign any statement which places you (the inspector) responsible for the health of the animals in the barrier facility.

Alternative Methods of Inspection

**Video Camera Inspection**
If a video camera is to be used for inspecting the barrier facility, the facility must meet the following minimum guidelines:

◆ Record the inspection so the inspector and licensee or designated person can refer back to the tape to review an area if any questions arise after the facility inspection.
◆ Sufficient or supplemental lighting in the room to allow for good visibility.
◆ Color monitor so that color differences can be seen. For example: to distinguish blood from other fluids, or to see algae/scum growth in water.
◆ Communication system between the person operating the camera and the inspector so that the inspector can direct the person to view different areas, or zoom in on an area.
◆ High resolution video camera so that the inspector can clearly see the animals in the enclosures and see subtle differences, such as being able to distinguish between bedding and feces in or beneath the enclosures.
Specific Types of Inspections
Barrier Facility Inspection

◆ Portable video camera with the ability to video all parts of all the rooms that will require inspection, such as the animals rooms, food and bedding storage areas, medication storage areas, and enclosure washing/sanitizing areas.

Through a Viewing Window
If the inspection is to be conducted through a viewing window(s), the facility must meet the following minimum guidelines:

◆ All parts of all the rooms that will require inspection, such as the animal rooms, food and bedding storage areas, medication storage areas, and enclosure washing/sanitizing areas, must be visible through the window(s).
◆ The lighting in the room must be sufficient to allow for good visibility or the facility must have supplemental lighting available.
◆ There must be a communication system between the person inside the room and the inspector, so that the inspector can direct the person to bring enclosures or animals to the window, or to open cabinets or containers.

Refusal of Inspection
If the licensee/registrant or his/her designated person refuses to allow the inspector to enter the barrier facility when all standard entry requirements have been met, and fails to provide an acceptable alternative method of inspection, document this as a “Refusal of Inspection” in the inspection report narrative section.

The inspector should:

◆ Complete an Official Inspection Report designating the inspection as “Routine”
◆ Document the refusal in the inspection report narrative section
◆ If safe, ask the person if he/she is refusing to allow the inspection
◆ Inform the licensee/registrant/designated authorized representative that this is noncompliant with the Animal Welfare Act
◆ Leave the facility
◆ Send the licensee/registrant his/her copy of the inspection report by regular mail and certified, return receipt mail
◆ Specify the date, time, and the name of the person who refused to allow the inspection, and any pertinent comments made by the person

NOTICE
If a non-designated person, such as an employee, refuses to allow the inspection, attempt to contact the licensee/registrant or authorized representative.
Change in Class of License Inspection

A licensee must complete the prelicense process to change his/her class of license. Refer to Chapter 2, Required Inspection Procedures, for information regarding the prelicense process.

A ‘Class A’ licensee is anyone meeting the definition of “dealer” whose business consists only of animals acquired for the sole purpose of maintaining or enhancing the breeding colony.

A ‘Class B’ licensee is anyone meeting the definition of “dealer” whose business includes the purchase and/or resale of any animal. Class B licensees include brokers and operators of auction sales, as such individuals negotiate or arrange for the purchase, sale, or transport of animals in commerce.

A ‘Class C’ licensee is anyone meeting the criteria of “exhibitor” whose business involves the showing or displaying of animals to the public.

Criteria

To change his/her class of license, a licensee must:

- Complete an Application for License–New License (APHIS Form 7003A–Application for New License on page A-11).
- Complete a prelicense inspection with no noncompliant items cited.
- Send the appropriate license fee and a voluntary cancellation form for the old license to the Regional Office.

If the inspector finds during an inspection, from the Regional Office or other sources, that the licensee has changed or plans to change his/her regulated activity, notify the licensee that he/she needs a different class of license and:

- Must complete an Application for License–New License (APHIS Form 7003A–Application for New License on page A-11), complete the TIN form, and pay the application fee
- Must not conduct the unlicensed activity until the new license is issued, but may conduct the regulated activities covered under the current license

Request an application packet from the Regional Office, if appropriate.

Conducting the Inspection

Noncompliant Items Identified
If noncompliant items are identified during the inspection:

1. Enter the inspection report into ACIS under the current prelicense site.
Specific Types of Inspections
Change in Class of License Inspection

A. Make sure no license number is visible in the certificate box in the ACIS screen for that new site.

B. If the licensee does not have a new prelicense site, refer to the steps for creating a new site.

2. Classify the inspection as “Prelicense #1”.

3. Inform the licensee that he/she **cannot** conduct the new activity if it is **not** allowed under his/her current license.

**EXAMPLE** For example, a “Class A” dealer who wants to exhibit animals.

4. Add the statement to the report “NO CLASS __ ACTIVITIES MAY BE CONDUCTED UNTIL A VALID USDA CLASS__ LICENSE IS OBTAINED.”

5. Schedule another inspection, if possible.

**No Noncompliant Items Identified**
If no noncompliant items are identified on the inspection:

1. Enter the inspection report into ACIS under the new prelicense site.
   A. Make sure **no** license number is visible in the certificate box in the ACIS screen for that new site.
   B. If the licensee does **not** have a new prelicense site, refer to the following steps.

2. Classify the inspection as “Prelicense Inspection #1.”

3. Follow the procedure for a prelicense inspection as detailed in Chapter 2-Required Inspection Procedures.

4. Add the statement to the report “NO CLASS __ ACTIVITIES MAY BE CONDUCTED UNTIL A VALID USDA CLASS__ LICENSE IS OBTAINED.”

5. Have the licensee send the new license fee, and the voluntary cancellation form for the old license to the Regional Office.

**NOTICE**
If the licensee changes his/her class of license prior to the expiration date of the previous license, **no** refund of the previous license fee is given.

If the licensee does **not** have a new prelicense site:

Option 1:
Specific Types of Inspections
Complaint Inspection

1. **Must** complete an Application for License–New License (APHIS Form 7003A–Application for New License on page A-11), complete the TIN form, and pay the application fee

2. Complete the Inspection Report using the agency standard word processing system

3. Contact an Inspection and Licensing Assistant (ILA) to create a prelicense site in ACIS

4. Enter the information from the Inspection Report into the ACIS database.

5. Submit the Application for License–New License (APHIS Form 7003A–Application for New License on page A-11), the TIN form, the application fee, the word processing inspection report, and the ACIS inspection report to the Regional Office.

Option 2:

1. **Must** complete an Application for License–New License (APHIS Form 7003A–Application for New License on page A-11), complete the TIN form, and pay the application fee

2. Contact an Inspection and Licensing Assistant (ILA) to create a prelicense site in ACIS.

3. Complete the inspection report in ACIS.

4. Submit the APHIS Form 7003-A, TIN form application fee, and inspection report to the Regional Office.

Complaint Inspection

A complaint inspection is conducted in response to a concern received by Animal Care. Refer to USDA, APHIS, Animal Care Animal Welfare Complaint Sheet on page A-43 for an example of a complaint form.

Sources of Information

Sources of information include, but are **not** limited to:

◆ APHIS personnel
◆ City, county, or State agency
◆ General public
◆ Non-government organization
◆ Other Federal agency
◆ Whistle blower
◆ You, the inspector
Specific Types of Inspections
Complaint Inspection

Methods of obtaining information include, but are not limited to:

- email
- Fax
- Letter
- Personal contact
- Phone call

**NOTICE**

The complainant does not have to give his/her name. In any case, an inspector cannot reveal, nor confirm, the source of any complaint. However, the complainant’s name may be subject to a Freedom of Information Act (FOIA) request.

**Information Follow-Up**

If you, the inspector, receive a complaint directly from the public, State or local official, humane society, etc., decide if the complaint information applies to the Animal Care Program.

**Table 4-1 Action to Take on a Complaint**

<table>
<thead>
<tr>
<th>If the complaint:</th>
<th>And:</th>
<th>Then:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Does not apply to Animal Care</td>
<td></td>
<td>REFER to the appropriate agency (i.e., U.S. Fish and Wildlife, State wildlife or animal welfare agency, local animal control, or humane society).</td>
</tr>
</tbody>
</table>
| Does apply to Animal Care              | It is not a possible non-compliance | 1. EXPLAIN the AWA regulations and standards.  
                                        |                             | 2. TAKE no further action.                                      |
|                                         | Is a possible non-compliance | INSTRUCT the complainant on how to contact the Regional Office       |
| Originates from the Regional Office    |                             | 1. REVIEW the complaint to determine if inspection is required.  
                                        |                             | 2. CONDUCT the inspection, if required.  
                                        |                             | 3. COMPLETE the lower portion of the Complaint Sheet and a memo detailing findings and specific issues.  
                                        |                             | 4. FORWARD the complaint sheet, inspection report, and memo to SACS for review and approval.  
                                        |                             | If you are unsure how to proceed on the complaint, contact your SACS. |

If you are unsure how to proceed on the complaint, contact your SACS.
The time frame for responding to a complaint depends on the severity of the situation. The response time may be:

1. Within 24 hours when:
   A. The animal’s health and well-being is threatened, e.g., an elephant is locked up in a truck on a hot day; or an extremely ill tiger is not being cared for properly.
   B. The public’s safety is threatened, e.g., unsafe enclosures for dangerous animals, or unsafe handling of non-caged dangerous animals.

2. As directed by your SACS or other program official for a situation with high public attention or Headquarters/Administration involvement.

3. As directed by your Regional Office (usually 10-30 days) for all other complaints, e.g., lions housed in a small enclosure, or a monkey on display in a pet store.

NCI Noted While Off-Duty
Refer to Action to Take on Noncompliant Item Noted While Off Duty on page 3-6 for instructions.

Dead Animal/Parts or Serum/Blood Dealer Inspection
A dealer who sells dead animals, unborn animals, organs, limbs, blood, serum, or other body parts of regulated animals must meet all applicable regulations and standards.

General Information

Dogs and Cats
If the animals arrive at the premises dead, specific areas to inspect include, but are not limited to:

◆ Records of acquisition
◆ Records of disposition

All Animals Other Than Dogs and Cats
If the licensee does not acquire nor take control of the animals prior to the animal’s deaths, no records are required.

If the animals arrive at the premises alive and are euthanized upon arrival, specific areas to inspect include, but are not limited to:

◆ Animal holding/euthanasia area
◆ Euthanasia procedures
Specific Types of Inspections
Dead Animal/Parts or Serum/Blood Dealer Inspection

◆ Records

If the animals arrive at the premises alive and are held prior to euthanasia, conduct a complete inspection.

**Blood and Serum**
If the animal is held long-term for collection of blood and/or serum, the program of veterinary care must also address:

◆ Frequency of collection
◆ Long-term care
◆ Volume per collection

**Species Specific**

**Dogs and Cats**
If the dealer takes possession of the live dogs and/or cats, each dog and/or cat must have an official USDA identification.

**Rabbits**
Carefully observe rabbits being used for antibody production for signs of pain or distress, such as:

◆ Apprehensive or anxious appearance
◆ Crying or squealing
◆ Excessive licking or scratching
◆ Grinding of teeth
◆ Hiding
◆ Hunched appearance

**NOTICE**
These are possible signs of pain and distress and do not necessarily mean the animal is in pain or distress. Also, a lack of these signs does not mean that the animal is not experiencing pain or distress.

Review the facility’s bleeding schedule to determine if it is appropriate to ensure the health and well-being of the rabbits.

General recommendations for bleeding of rabbits include, but are not limited to:¹

◆ National Institute of Health (NIH) recommends a maximum bleeding of:

---
¹ Reference: *Laboratory Animals* (1993) 27, 1-22
Specific Types of Inspections
Dead Animal/Parts or Serum/Blood Dealer Inspection

- 10 percent TBV (Total Blood Volume) every 3-4 weeks, or
- 7 ml/kg/month

**NOTICE**

Total blood volume is considered to be 7 percent of body weight with 1 ml of blood equal to 1 gram. Average TBV for a mature, healthy rabbit is approximately 44-70 ml/kg

- Industry recommendations may be:
  - 10 percent TBV every 2 weeks to 15 percent TBV every 4 weeks, or
  - 10 ml/kg/month
- If a facility is drawing more than 7 ml/kg/month, the rabbit should be monitored for physical distress, for example, by periodic hematocrit checks (a rabbit’s normal PCV is 30-50).
Refer to Figure 4-1 and Figure 4-2 for species specific sampling rates.

<table>
<thead>
<tr>
<th>SPECIES</th>
<th>*Mean blood volume</th>
<th>AVERAGE WEIGHT</th>
<th>*MAXIMUM VOLUME IN MILLILITERS FOR SINGLE SAMPLING</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Based on Recovery Period</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Weekly (7.5% of blood volume removed)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Every 14 days (10.0% of blood volume removed)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Every 30 days (15.0% of blood volume removed)</td>
</tr>
<tr>
<td><strong>Mouse/Dormice</strong> (Based on mean blood volume)</td>
<td>72 ml/kg</td>
<td>20g</td>
<td>0.10</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.15</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td>30g</td>
<td>0.16</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.23</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.32</td>
</tr>
<tr>
<td></td>
<td></td>
<td>40g</td>
<td>0.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.30</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.45</td>
</tr>
<tr>
<td><strong>Rat/Cotton Rat</strong> (Based on mean blood volume)</td>
<td>64 ml/kg</td>
<td>250g</td>
<td>1.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.60</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2.40</td>
</tr>
<tr>
<td></td>
<td></td>
<td>500g</td>
<td>2.40</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>4.80</td>
</tr>
<tr>
<td><strong>Rabbit</strong> (Based on mean blood volume)</td>
<td>62 ml/kg</td>
<td>3 kg</td>
<td>13.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>18.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>27.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 kg</td>
<td>18.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>24.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>37.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 kg</td>
<td>23.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>31.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>46.0</td>
</tr>
<tr>
<td><strong>Hamster</strong> (Based on mean blood volume)</td>
<td>78 ml/kg</td>
<td>100 g</td>
<td>0.50</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.70</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.10</td>
</tr>
<tr>
<td></td>
<td></td>
<td>125 g</td>
<td>0.70</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.90</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.40</td>
</tr>
<tr>
<td></td>
<td></td>
<td>140 g</td>
<td>0.80</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.60</td>
</tr>
<tr>
<td><strong>Guinea Pig</strong> (Based on mean blood volume)</td>
<td>75 ml/kg</td>
<td>300 g</td>
<td>1.70</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.30</td>
</tr>
<tr>
<td></td>
<td></td>
<td>500 g</td>
<td>2.80</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.70</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>5.60</td>
</tr>
<tr>
<td></td>
<td></td>
<td>800 g</td>
<td>4.50</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>6.00</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>9.00</td>
</tr>
<tr>
<td><strong>Gerbil</strong> (based on mean blood volume)</td>
<td>67 ml/kg</td>
<td>40 g</td>
<td>0.20</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.25</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.40</td>
</tr>
<tr>
<td></td>
<td></td>
<td>50 g</td>
<td>0.25</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.30</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.50</td>
</tr>
<tr>
<td></td>
<td></td>
<td>60 g</td>
<td>0.30</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.40</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.60</td>
</tr>
<tr>
<td><strong>Rhesus/Pigtail monkey</strong> (based on mean of blood volume)</td>
<td>54 ml/kg</td>
<td>3 kg</td>
<td>12.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>16.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>24.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>5 kg</td>
<td>20.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>27.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>40.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>8 kg</td>
<td>32.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>43.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>64.0</td>
</tr>
<tr>
<td><strong>Cynomolgus monkey</strong> (Based on mean blood volume)</td>
<td>65 ml/kg</td>
<td>2 kg</td>
<td>9.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>13.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>19.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>4 kg</td>
<td>19.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>26.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>39.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>6 kg</td>
<td>29.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>39.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>58.0</td>
</tr>
<tr>
<td><strong>Squirrel/Owl monkey</strong> (Based on mean blood volume)*</td>
<td>70 ml/kg</td>
<td>0.5 kg</td>
<td>2.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>5.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.0 kg</td>
<td>5.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>7.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>10.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.5 kg</td>
<td>7.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>10.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>15.0</td>
</tr>
</tbody>
</table>
### Specific Types of Inspections

#### Dead Animal/Parts or Serum/Blood Dealer Inspection

**Table 4-2** Maximum Volume for Single Sampling for Various Species (page 2 of 2)

<table>
<thead>
<tr>
<th>Species</th>
<th>Mean Blood Volume (ml/kg)</th>
<th>Weight (kg)</th>
<th>Volume (ml)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Common Marmoset Tamarin</td>
<td>58</td>
<td>0.5</td>
<td>2.8</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.0</td>
<td>5.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.5</td>
<td>11.8</td>
</tr>
<tr>
<td>Ferret</td>
<td>75</td>
<td>0.5</td>
<td>2.8</td>
</tr>
<tr>
<td>(based on mean blood volume)</td>
<td></td>
<td>1.0</td>
<td>7.4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.5</td>
<td>11.2</td>
</tr>
<tr>
<td>Dog</td>
<td>86</td>
<td>0.5</td>
<td>4.5</td>
</tr>
<tr>
<td>(based on mean blood volume)</td>
<td></td>
<td>1.0</td>
<td>8.6</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.5</td>
<td>12.9</td>
</tr>
<tr>
<td>Goat</td>
<td>70</td>
<td>0.5</td>
<td>21.0</td>
</tr>
<tr>
<td>(based on mean blood volume)</td>
<td></td>
<td>1.0</td>
<td>56.0</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.5</td>
<td>84.0</td>
</tr>
<tr>
<td>Sheep</td>
<td>66.4</td>
<td>0.5</td>
<td>24.9</td>
</tr>
<tr>
<td>(based on mean blood volume)</td>
<td></td>
<td>1.0</td>
<td>66.4</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.5</td>
<td>99.6</td>
</tr>
</tbody>
</table>

**References**


**Calculations:**

Mean blood volume \( \times \) Average weight \( \times \) weekly volume removed = Maximum volume for single sampling

**Examples:**

- Gerbil: 67 ml/kg x 0.050 kg x 0.075 = 0.25 ml in a single sample with 7 day recovery
- Goat: 70 ml/kg x 40.0 kg x 0.10 = 280.0 ml in a single sample with 14 day recovery
- Dog: 86 ml/kg x 10.0 kg x 0.15 = 129.0 ml in a single sample with a 30 day recovery

*Calculated amounts may have been rounded to the most convenient withdrawal volume
*Rats and mice are used as comparable species for similar exotic or wild rodents

---

**Figure 4-2** Maximum Volume for Single Sampling for Various Species (page 2 of 2)
Dogs and Cats in Residence Inspection

Inspecting dogs and/or cats that are being kept and/or bred inside the licensee or applicant’s home can be challenging. Many of the standards used during routine kennel inspections are not applicable. It is important that the inspector take the overall conditions into account in making a determination and always contact a supervisor if there are questions.

◆ All regulated dogs and cats must be officially identified and listed on the appropriate animal inventory form.

◆ Do not enter or stay in a residence unless you are sure you are safe.

◆ Do not intrude into areas of the home which are not critical to evaluating the conditions for the regulated dogs or cats.

◆ Do not open cabinets, refrigerators, drawers, or doors unless you have the expressed permission of the owner and the contents are directly related to the care of the dogs or cats.

◆ Do not refer to the facility as a “house”, “home”, or “residence” on an inspection report. Use the term “facility”, or some other mutually agreeable term such as “small dog area” or “retired breeder housing area.”

◆ Do not use the impervious surfaces standards under sections 3.2(d), 3.26(d), or 3.51(d), unless there is a designated housing or whelping area inside the home. For example, a bathroom used for whelping should have surfaces that can be sanitized but that applies to the bathroom area only. A living room where dogs hang out and watch television cannot be required to have surfaces that are impervious to moisture.

◆ Focus on the health of the animals and any direct hazards to their health or safety, particularly in areas not dedicated to housing animals. For example, in the living room, you would be looking at the health of the animals and such potential hazards as access to electric wires, bleach, choking or ingestion hazards, or significant waste disposal issues.

◆ Occasionally, a mudroom, laundry room, enclosed porch, or bathroom is used as a designated whelping or housing area. When animals are present, these areas must provide adequate temperature and ventilation and be easily cleaned and sanitized for the health of the animals.

◆ Wear clean boots or shoe covers to enter the premises. Do not use the same boots or shoe covers in which you inspected any other kennel buildings.

◆ When photographs are required, be extremely careful to only photograph what is necessary to document the noncompliance. Be sensitive to the fact that taking a large number of photographs in someone’s house or
photographing personal belongings may add stress to the inspection process. Take the minimum number of photographs needed.

It is important to be sensitive to the fact that this is the licensee’s or applicant’s home, and act accordingly. There is no limit under the AWA on the number of pets that a person can have in their house. We know from experience that a large number of dogs or cats housed in a residence can create unhealthy conditions. If you encounter an unusually large number of dogs or cats in a residence, or have concerns about general conditions in a residence, postpone the completion of the inspection and contact your supervisor.

**Drive-through Zoo Inspection**

A zoo or animal park which allows people to drive through, either in their own vehicles or a zoo/park vehicle, **must** meet all applicable regulations and standards.

**Conducting the Inspection**

When inspecting a drive-through zoo (or park), some recommended items to evaluate include, but are not limited to:

- Access of shelter to all the animals
- Availability of potable water
- Capture methods if veterinary care is needed
- Compatibility of the animals in an area
- Control of feeding of the animals by the public, such as:
  - Action taken if finding people feeding animals or feeding inappropriate food
  - Appearance of the animals, i.e., too thin or too fat
  - Measures for stopping people from bringing in food for the animals
  - Measures to prevent people from feeding animals, if **not** allowed
  - Monitoring animals for adequate food intake
- Death loss, especially among young animals
- Management of the males to prevent fighting during rutting season
- Measures to protect the safety of the public and animals, such as
  - Caution signs reading:
    - Do not get out of car
    - Do not put fingers in cages
  - Monitoring of the zoo/park by employees during their regular duties
Specific Types of Inspections

Inactive Research Facility or Research Facility with No Activity for Two Years—Inspection

- Monitoring of areas not readily visible to attendants
- Patrol of zoo/park by attendants
- Posting or distribution of the safety rules
- Speed bumps
- Video monitoring

- Monitoring of large areas of natural habitat for hazards, such as flooding or deep mud which animals could get mired in
- Monitoring of the animal’s health and well-being, including meeting the veterinary care daily observation requirement
- Number of employees to patrol the zoo/park
- Off-exhibit areas, if any
- Procedure in the event of an animal escape or attack
- Proper nutrition for carnivores
- Routine veterinary care, such as vaccinations and worming
- Shelter, either artificial or natural, for the zoo/park’s climatic conditions
- Size of shelter for the number of animals
- Training of the employees

Suggested topics to discuss with the exhibitor, which may or may not be regulatory requirements, include:

- Emergency procedures for:
  - Attacks
  - Escapes
  - Natural disasters
- Enrichment for animals other than nonhuman primate, such as:
  - Elevated surfaces for cats
  - Pools for tigers and bears
- Provision and visibility of water for the animals (public perception vs. AWA standards)

Inactive Research Facility or Research Facility with No Activity for Two Years—Inspection

Inactive Research Facility
A research facility may request to be placed in an inactive status if the research facility has:
Specific Types of Inspections
Inactive Research Facility or Research Facility with No Activity for Two Years—Inspection

- Made a written request to the Regional Director for the State in which it is registered, and
- **Not** used, handled, or transported regulated animals for a period of at least two years

An inactive research facility **must**:

- File an annual report of its status
- Notify the appropriate Regional Director, in writing, at least ten days prior to using, handling, or transporting regulated animals again

**Research Facilities with No Regulated Activity for Two Years**
Inspect an active research facility which has not conducted any regulated activity for at least two years the same as an inactive research facility even though the research facility has not requested inactive status.

**Inspection Frequency**
Inactive research facilities and research facilities with no activity for two years are inspected at least annually.

Contact your SACS if you are **unable** to inspect a facility during the required period.

**Inspection Procedures**
You, the inspector, should inspect records and facilities to confirm that the research facility has **not** used, handled or transported any regulated species and has **not** conducted any regulated activity since your last inspection, then:

- Document on the inspection report, “**No** regulated activities.”
- Encourage the research facility to cancel its registration.
- Ensure that the research facility has an IACUC in place and has filed an Annual Report.

If there are covered species present, but they are **not** being used for a covered activity at the time of your inspection:

- Document on the inspection report, “**No** regulated activities.”
- Ensure that the research facility has an IACUC in place and has filed an Annual Report.
- Ascertain that the IACUC has reviewed the use of the covered species and determined that the use of the animals is exempt from coverage.

Examples of covered animals being used for non-covered activity include, but are **not** limited to:
Lion and Tiger Enclosure Heights and Kick-Ins Inspection

This document provides guidance for assessing the height of lion and tiger enclosures (this includes liger enclosures) under commonly found circumstances at stationary facilities for purposes of primary containment. It does not provide guidance for assessing the structural integrity or other factors related to housing facilities.

This guidance is a distillation of a well-established interpretation of the AWA regulations and standards. Section 3.125(a) provides that indoor and outdoor housing facilities must be structurally sound and maintained in good repair to protect the animals from injury and to contain the animals. For lions and tigers and many other animals, this primary containment system must be backed up by a secondary containment system (a perimeter fence) in most outdoor housing facilities to further ensure the safety and well-being of the animals.

The following guidelines are to be used by all inspectors and compliance specialists to assure uniform implementation. These guidelines are based on Animal Care’s experience of more than 40 years with inspecting licensees and registrants that house potentially dangerous animals, like lions and tigers, and recent events that highlight instances where animals have escaped, as well as specific species’ and animals’ capabilities.

Despite our best evaluation of what will contain an animal, there may still be an escape. If an animal escapes from an enclosure, that enclosure will have to be modified to be considered to be in compliance, regardless of the previous determination.

Complete a checklist in ACIS documenting the safety of lion and tiger enclosures for each facility with lions and tigers. All citations must refer back to the language of the regulations; there are no engineering standards.

Fencing recommendations regarding the fence height and enhancing structural components like kick-ins and high-tensile electric wire appropriate for the species will be divided into three categories:

- Agricultural animals used for developing antibodies for agricultural animals
- Breeding trials in sheep
- Pigs on food conversion studies for pig feed
Specific Types of Inspections
Lion and Tiger Enclosure Heights and Kick-Ins Inspection

- Under Review on page 4-27
- Compliant Requiring No Further Action on page 4-28
- Noncompliant Prompting a Citation on page 4-28

**Under Review**
This category should be evaluated first to determine if there are any special circumstances associated with animals and/or enclosures that would prevent an enclosure from being considered as “Compliant Requiring No Further Action” or “Non-compliant Prompting a Citation.” Some examples of circumstances that would prompt placing an enclosure in the “Under Review” category are listed below (NOTE: this is not an all-inclusive list). For these enclosures, photos and measurements should be submitted to the Big Cat Field Specialist and SACS for review through the use of the “Checklist for Documenting the Safety of Lion and Tiger Enclosures Fencing Height” sheet in ACIS. The Big Cat Field Specialist and SACS will work together to develop a recommendation. If there are no special circumstances, then the enclosure should be assessed to determine if it is “Compliant Requiring No Further Action” or “Non-compliant Prompting a Citation.”

Do not cite or note enclosures that are under review on an inspection report.

Examples of enclosures that an inspector could send for review include:
- Enclosure fence 14 feet in height with a kick-in of 2 feet
- Fencing a minimum of 12 feet in height with a species-appropriate high-tensile, smooth electric wire
- An enclosure fence 14 feet in height with a line of electric wire along the top
- An enclosure fence of 12 feet in height with a 2 foot kick-in and an impregnable perimeter fence at a facility the public does not visit
- An enclosure fence of 10 feet with 3 feet or greater kick-ins where animals have lived without incident for over 4 years
- An enclosure containing a lion and tiger that has physical limitations (old/fat/disabled/blind) that may be adequately contained in an enclosure that does not meet the guidance for clearly compliant enclosures
- An enclosure with trees or enclosure furniture that may be too close to the fence

The inspector should consult with the licensee on an appropriate identifier for each enclosure. The identifier may be the: name of the animal in the enclosure; location of the enclosure on the premises; enclosure number, etc. This identifier will be used with the corresponding photos in completing the
Specific Types of Inspections
Lion and Tiger Enclosure Heights and Kick-Ins Inspection

“Checklist for Documenting the Safety of Lion and Tiger Enclosures Fencing Height” sheet in ACIS and in the subsequent letter from the regional office.

Compliant Requiring No Further Action
Some structures would be considered compliant for meeting the performance-based standards of §3.125(a) absent special circumstances, based on the known physical and behavioral characteristics of Lion and Tiger species and the configuration of the enclosure. Some examples of structures include but are not limited to:

◆ Fencing a minimum of 12 feet in height with a 3 foot angled kick-in
◆ Fencing a minimum of 16 feet in height
◆ Fencing 8 feet in height with a completely covered top (Note: All enclosures with a completely covered top must allow for normal and typical behaviors and postures.)
◆ A dry moat that is 25 feet wide or greater and at least 16 feet deep if both sides are at the same level and there are no deterrents at either side
◆ A moat that is at least 20 feet wide if the exhibit side is at least 5 feet or more lower than the public side
◆ A wet moat that is at least 20 feet wide with water at least 5 feet deep at all times with another 5 foot wall extending beyond the water level

Noncompliant Prompting a Citation
An example of a noncompliant prompting a citation is enclosure fencing that is insufficient to contain the animals housed within.

Completing the Checklist
The inspector will be prompted to review and document the status of the lion/tiger enclosures before finalizing in ACIS your initial inspection on facilities that list lions and/or tigers in the inventory. The three possible responses are:

◆ All species specific enclosures are in compliance.
  ❖ This completes the checklist and you are taken to the report to review and finalize.
◆ All species specific enclosures are not in compliance, no help needed.
  ❖ Use this option if there is a combination of compliant and noncompliant enclosures.
  ❖ This completes the checklist and you are taken to the report to review and finalize.
◆ One or more species specific enclosures are unsure and help is requested.
Use this option if there is a combination of compliant and noncompliant enclosures in which one or more is unsure and help is needed.

Complete the specialist review form where you will provide:

- Location Name: Use the enclosure identifier determined by you and the licensee
- Location Description: Describe the animals contained in the enclosure; the height of the fencing; the materials used for the fencing; the approximate dimensions of the enclosure
- Location Comments: Add any comments or recommendations to the Big Cat Specialist/RO

Link the photos of the enclosures you uploaded to the inspection report to each enclosure description. Photos must include:

- Something that provides a reference for the scale of the fencing height; Be sure to get the entire fence from top to bottom in the photograph.
- The kick-ins with a side view as much as safely possible.
- Trees or cage furnishings that may be too close to the fence. Try to include two views from different sides.

Field Specialist Review
The big cat field specialist will enter into ACIS a written assessment of the suitability of the enclosure(s) to contain the animals being housed in them. The appropriate personnel will prepare the review response letter for the Regional Director or Assistant Regional Director signature. The review response letter will contain for each reviewed enclosure: the decision regarding each enclosure; a correction deadline, if necessary, and other relevant needed information. The letter will be mailed to the facility. A copy of the final letter will be maintained in the customer files in ACIS and a copy of the letter emailed to the SACS, inspector and the big cat field specialist.

Subsequent Inspections of Reviewed Enclosures
At the next inspection of a facility placed under review, you will receive a prompt to review and document the status of the enclosures that were not in compliance or were found to be compliant based on specific current conditions during the previous inspection. Additional review of the enclosure is dependent on the following criteria:

- Enclosures found not in compliance, current status?
- In compliance: You will receive no further prompts on subsequent inspections
Specific Types of Inspections
Pet Store Inspection

- Time still remaining: You will be asked to review the enclosure at the next inspection.
- If not in compliance, select the applicable NCIs for this enclosure.

◆ Enclosures found not in compliance based on specific current conditions: are these conditions still true for these enclosures?
- If the conditions are still true, you will continue to finalize the report and will be asked to review the enclosure at the next inspection.
- If the enclosure is in compliance now, the process ends and you will receive no further prompts on subsequent inspections.
- If not in compliance, you will be asked to select the appropriate NCIs on the inspection report citing this enclosure’s noncompliance.

Pet Store Inspection

A pet store licensed as a dealer or exhibitor must meet all applicable regulations and standards.

Criteria
If a pet store is licensed, all regulated animals in the pet store or under the control of the licensee must be inspected.

Regulated animals commonly encountered in a pet store include, but are not limited to:

◆ Traditional pet types, such as:
  - Cat
  - Chinchilla
  - Dog
  - Ferret
  - Gerbil
  - Guinea pig
  - Hamster
  - Rabbit

◆ Wild/exotic animals or pocket pets, such as:
  - Chipmunk
  - Degu
  - Duprasi
  - Flying squirrel
Specific Types of Inspections

Petting Zoo Inspection

- Hedgehog
- Jerboa
- Naked mole rat
- Nonhuman Primate (usually for exhibit)
- Opossum
- Skunk
- Spiny mice
- Sugar glider

Record Requirements

A “Record of Acquisition” is required for all regulated animals acquired by the pet store.

- Information in 2.75(a) is required, but use of APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand on page A-15 is optional

- Information in 2.75(b) is required, but use of APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats) on page A-29 or APHIS Form 7020A-Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals (Other than Dogs and Cats) on page A-27 is optional

- If animals are found to have been “dropped off” by unknown person(s) at a licensed pet store, the licensed pet store has the option of taking the animals in and selling them retail. In such cases, the licensed pet store would be required to document the available acquisition information.

A “Record of Disposition” is required only for the animals that were the basis for licensing, such as wild/exotic pocket pets, raccoons, primates, etc.

- Use APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats) on page A-29 or APHIS Form 7020A-Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals (Other than Dogs and Cats) on page A-27

Exemption

Pet stores are not required to have official USDA identification on dogs and cats.

Petting Zoo Inspection

A Class C exhibitor and a Class B dealer who operate a petting zoo as a minor part of his/her business must meet all applicable regulations and standards.
Inspection Procedures

Handling
Closely observe the handling of the animals when inspecting a petting zoo.

Proper handling of the animals includes, but is not limited to:

◆ Animals are exhibited only for a period of time and under conditions consistent with their good health and well-being
◆ Dangerous animals, such as lion, tiger, or bear cubs must be:
  ▶ Separated from the public by a barrier, and
  ▶ Under the direct control and supervision of a knowledgeable and experienced handler
◆ During periods of public contact, an employee or attendant is present at all times. This employee/attendant must be:
  ▶ Knowledgeable
  ▶ Readily identifiable
  ▶ Responsible
◆ If public feeding is allowed, food must be:
  ▶ Appropriate for the animal’s nutritional needs and diet
  ▶ Appropriate to the type of animal
  ▶ Provided by the animal facility
◆ There are adequate public barriers, when appropriate
◆ There is minimal risk of harm to the animals and the public

Public Contact
If young or immature animals are being exhibited, they may not be:

◆ Exhibited for periods of time that would be detrimental to their health and well-being
◆ Exposed to rough or excessive public handling

Drugs may not be used to facilitate, allow, or provide for public handling of the animals.

Miscellaneous
Other items to evaluate include, but are not limited to:

◆ Animal areas where the public is not allowed
◆ Cleanliness and sanitation of the enclosures
Specific Types of Inspections
Petting Zoo Inspection

- Compatibility of the animals in an enclosure
- Condition of the animals
- Enclosure fencing to protect the animals
- Measures being taken to prevent disease transmission to the public

**NOTICE**

You should recommend that the exhibitor or dealer follow the CDC Guidelines for protecting the public against enteric pathogens, if he/she is not already doing so. Click [here](#) for the CDC guideline.

- Method(s) for allowing animals time away from public contact, such as:
  - Large enclosures
  - Solid walls on outside of enclosures
- Method(s) for allowing animals time away from view of the public, such as:
  - Barns
  - Burrows or dens
  - Curtained off areas
- Public feed dispensers. Inspect for:
  - Accumulation of old food or feed debris, especially at the bottom of the dispenser
  - Cleanliness
- Security measures if animals left overnight
- Shelter and shade for environmental conditions
- Vehicles used to transport the animals
- Water availability for the environmental conditions

Remember the following housing restrictions:
- Guinea pigs may **not** be housed in outdoor facilities, unless prior approval has been obtained from the Regional Director
- Hamsters may **not** be housed in outdoor facilities
- Rabbits may **not** be housed in the same primary enclosure with any other species, unless prior approval has been obtained from the Regional Director
Traveling Petting Zoo Itinerary
At least 48 hours prior to overnight movement, Regional Office must receive a document identifying the information required below. This means, that if USPS is used, the document must be mailed sufficiently far in advance to arrive at the Regional Office by the deadline. There is no penalty for notifying the Regional Office any time in advance.

Itinerary information is required for all regulated animals that are away from the home site at least overnight for the purpose of exhibition. This does not include animals transported to a veterinary facility for treatment or evaluation; this does not apply to breeding loans or animals relocated during renovations, nor does it apply to animals that are taken home overnight for extensive husbandry care (such as attendants taking very young animals home for overnight feedings and monitoring.)

The following information must be included in the itinerary document submitted to the Regional Office:

**Exhibitor information:**
1. Name of licensee
   A. Name of person exhibiting
   B. Business name of licensee
   C. USDA AWA license/registration number
2. Name of owner of animal (for leased, borrowed, loaned, etc. animal)

**Animal information:**
1. Name of animal
2. Identification number of animal or identifying characteristic
3. Species of animal (scientific name or common name)
4. Sex and age of animal

**Exhibition and transport information:**
1. Name of transporter
2. Name of exhibition location
3. Dates at the exhibition location
4. Name, date, location (address, directions, GPS location, etc.) of all stops and layovers where animals are removed from transport vehicle or crates

If the exhibitor’s plans change:
◆ They may contact the Regional Office to amend their itinerary.
Specific Types of Inspections
Petting Zoo Inspection

- If not by email or fax (telephone for example), the change in plans must be followed by written notification as soon as possible.

- If there is an emergency change after USDA business hours (weekdays, 0800 to 1700), notify the Regional Office by the next business day.

**Determine Compliance with the Itinerary Requirements**
The Regional Offices (RO) will notify all TRA exhibitors of the requirements. Refer to Table 4-2 for actions to take on itinerary and traveling status.

**Table 4-2 Traveling Petting Zoo Itinerary Guidance**

<table>
<thead>
<tr>
<th>Itinerary Status:</th>
<th>Is the exhibitor traveling?</th>
<th>Then:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Received and accurate</td>
<td></td>
<td>The exhibitor is in compliance</td>
</tr>
<tr>
<td>Received but incomplete</td>
<td></td>
<td>The exhibitor is not in compliance. The RO will contact the exhibitor to acquire the additional information. If additional information is not received, AC will follow the process for &quot;No Itinerary and Traveling&quot;</td>
</tr>
<tr>
<td>Received but incorrect</td>
<td></td>
<td>The exhibitor is not in compliance. CITE the licensee for attempted inspection and failure to have an accurate itinerary on file.</td>
</tr>
<tr>
<td>None received Not traveling</td>
<td></td>
<td>The exhibitor is in compliance</td>
</tr>
</tbody>
</table>
| Traveling |                            | AC may confirm that they are traveling:  
  - If a public compliant is received  
  - By conducting an internet search of their exhibitions  
  - By conducting an attempted inspection at the home site  
  - Through direct contact by the home inspector  
  The RO will send a second written request for the itinerary. If the itinerary is still not received and the location of the licensee is unknown, then an AC inspector will go to the home site, inspect, and educate the licensee on the itinerary rule. If the licensee is not home, the AC inspector will CITE for an attempted inspection and failure to have an itinerary on file.  
  If AC knows the whereabouts of the licensee, then:  
  - An AC inspector will go to the TRA site  
  - Conduct an inspection, and  
  - CITE the licensee for failure to have an itinerary on file |
Photo Shoot Inspection

Anyone providing or using regulated animals for photo shoots must be licensed and meet all the applicable regulations and standards.

**NOTICE**

Photos of free-living wild animals is an exempt activity.

Types of Photo Shoots

Types of photo shoots include, but are not limited to:

- Animal actors/movie animals
- Animals released into a natural setting for the photo
- Holiday photos with lambs or rabbits

**NOTICE**

Pictures of people with their pets are exempt.

- Photos for advertising
- Photos for calendars
- Photos for magazines
- Photos with people petting or sitting with wild/exotic animals

Conducting the Inspection

When inspecting a photo shoot, recommended items to evaluate include, but are not limited to:

- Age of dangerous animals being used for public contact photos
- Availability of potable water
- Availability of veterinary care, if needed
- Housing of the animal(s) when not being used for the photo shoot
- Measures to protect the safety of the public and the animal(s)
- Number of employees available to control the animal(s)
- Off-exhibit area, if any
- Procedure in the event of an animal escape or attack
- Public barriers, especially for animals not currently being used for photos
- Rest periods for the animals
- Restraint methods for the age and size of the animal(s)
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

- Safety measures for the movement of the animal from the enclosure to the photo shoot and back

**NOTICE**
Drugs may not be used to control the animals.

- Safety measures if no perimeter fence
- Training and handling experience of the employees
- Transport of the animal to and from the photo shoot

**Random Source Dog and Cat Dealer Inspection**

**Only** a Class B dealer may acquire random source dogs and cats for resale.

**Definition**
The definition of “random source” is dogs and cats that have been obtained from animals pounds or shelters, auction sales, or from any person who did not breed and raise them on his/her premises.

**Acceptable Procurement Sources**
A Class B dealer may obtain live random source dogs and cats only from the following sources:

- Humane groups and contract pounds organized as legal entities under the laws of their State
- Other USDA licensed dealers
- State, county, or city owned and operated animal pounds or shelters

A Class B dealer may obtain non-random source dogs and cats from persons who have bred and raised the animals on their own premises.

**Unacceptable Procurement Sources**
A Class B dealer may not obtain dogs and cats:

- By use of false pretenses, misrepresentation, or deception
- From a person who did not breed and raise the animal on his/her premises

**Holding Period for Pounds, Shelters, and Research Facilities**
Random source dogs/cats must be held for a period of not less than five full days, including a Saturday, but not including the day of an acquisition and transit time, by the following entities:

- Pound/shelter owned and operated by a State, county, or city
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

◆ Privately owned pound/shelter, such as a humane society, that is under contract with a State, county, or city
◆ Research facility licensed as a dealer

Table 4-3 Holding Period for Dogs and Cats Held by Random Source Class B Dealers

<table>
<thead>
<tr>
<th>If the source is:</th>
<th>And the age of the dog/cat is:</th>
<th>Then the holding period is:</th>
</tr>
</thead>
<tbody>
<tr>
<td>A private pound, contract pound, or shelter</td>
<td>Any age</td>
<td>Ten full days, not including the day of acquisition and the time in transit</td>
</tr>
<tr>
<td>A State, city, or county operated pound or shelter</td>
<td>Any age</td>
<td>Five full days, not including the day of acquisition and the time in transit</td>
</tr>
<tr>
<td>A private individual who bred and raised the dog/cat on his/her premises</td>
<td>(&lt; 120 \text{ days})</td>
<td>24 hours, not including the time in transit</td>
</tr>
<tr>
<td>A private individual who bred and raised the dog/cat on his/her premises</td>
<td>(&gt; 120 \text{ days})</td>
<td>Five full days, not including the day of acquisition and the time in transit</td>
</tr>
<tr>
<td>Another USDA licensed dealer or exhibitor who has already held the dog/cat for the required holding period</td>
<td>Any age</td>
<td>24 hours, not including the time in transit</td>
</tr>
<tr>
<td>Another USDA licensed dealer or exhibitor who has not held the dog/cat for the required holding period</td>
<td>Any age</td>
<td>Five full days, not including the day of acquisition and the time in transit</td>
</tr>
</tbody>
</table>

Records
Records of all dogs and cats must contain the following information:

◆ A description of each animal, including:
  ✤ Color and any distinctive markings
  ✤ Date of birth or approximate age
  ✤ Sex
  ✤ Species and breed or type
  ✤ USDA tag number
◆ Date animal was acquired
◆ Date animal was disposed of, including euthanasia
◆ Name and complete address of the seller, buyer, or person to whom the animal is given
◆ USDA license or registration number if buyer/seller/donee is USDA licensed or registered
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

◆ Vehicle license number, driver’s license number, and State of issuance of each, if seller/buyer/donee is not USDA licensed or registered

Complete and maintain records on APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand on page A-15 and APHIS Form 7006–Record of Disposition of Dogs and Cats on page A-17.

Exception
A dealer who uses a computerized record keeping system may request a variance from the requirement to use the APHIS Forms 7005 and 7006.

The variance request must:
◆ Be in writing
◆ Explain why the APHIS Form 7005/7006 is unsuitable to use
◆ Contain a description and sample of the computerized record keeping system to be used
◆ Be sent to the appropriate Animal Care Regional Office

If the variance is denied, the dealer may request a hearing for the purpose of showing why the variance should not be denied.

The denial of the variance remains in effect until the final legal decision is rendered.

Records Holding Period
Hold records for inspection for 1 year after the animal is disposed of or euthanized.

Keep records for more than 1 year if:
◆ APHIS Administrator notifies the dealer in writing that specified records must be retained pending completion of an investigation
◆ Necessary to comply with any applicable Federal, State, or local law

Tracebacks
Conduct tracebacks following every inspection of a random source Class B dealer. Refer to Animal Care Traceback Worksheet on page A-53 for an example of the traceback worksheet.
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

Standard Operating Procedures for Conducting Tracebacks from Random Source B Dealers (July 31, 2009)
A random source B Dealer (RSBD) is a licensed dealer holding a class B license who buys and sells random source dogs and cats. Random source animals are defined in the Animal Welfare regulations as “dogs and cats obtained from animal pounds or shelters, auction sales, or from any person who did not breed and raise them on his or her premises.” These animals are generally sold for research purposes. While the term “random source” applies to both dogs and cats, dogs are the animal primarily involved in this type of activity.

Under the RBIS system, RSBDs are inspected more frequently than other dealers because of the nature of their business. One reason for more frequent inspections is to ensure that the dogs and cats at the RSBD’s facility were acquired in accordance with regulations. The legitimacy of the acquisition of these dogs and cats is assured by conducting tracebacks on a sampling of the dogs and cats acquired within the time period since the last inspection. A major purpose of the traceback is to determine if a dog or cat was obtained from a legitimate source. A RSBD who acquires random source dogs and cats from prohibited sources is subject to enforcement action.

NOTICE

The term “dog” as used throughout this document refers to random source dogs. However, all situations described for dogs also apply to random source cats, since cats may also be involved in random source sales and acquisitions.

The term ‘pound” as used in this document refers to any pound or shelter that is owned and operated by a State, county, or city, as well as any legal entity operating as a contract pound or humane shelter under the laws of the State in which it is located. See Section 2.31(a)(2&3) of the regulations.

Inspecting a RSBD

Inspection Frequency for a RSBD
RBIS requires that all RSBDs be inspected no less than quarterly. In practice, this means that inspections of RSBD facilities must be conducted no more than 90 days apart.

Sources for Random Source Dogs
Section 2.132(a) of the regulations limits the acquisition of random source dogs by class B dealers to the following sources:

1. Another licensed dealer,
2. State, county, or city owned and operated pounds and shelters,
3. Contract pounds or shelters.
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

Acquiring dogs or cats from sources other than those listed above is noncompliant with regulations and the RSBD may be subject to enforcement action.

If someone, such as a hound breeder, sells dogs that he or she has bred and raised to a RSBD, those dogs are not random source dogs when they are purchased, since they do not meet that definition until the RSBD resells them. The RSBD would be noncompliant with Section 2.132(d) however, if he buys 25 or more dogs within a year from an unlicensed breeder, since that breeder would no longer be exempt from the licensing requirement. Section 2.132(d) and Section 2.133 also contain certification requirements that the RSBD must comply with.

Examining RSBD Records
During an inspection, the inspector should determine that the acquisition and disposition records for an RSBD contain all the information required by Section 2.75(a). Acquisition records should include the physical address of the seller, not just a P.O. Box. Every dog acquired or sold by the RSBD must be accounted for and all required information on the seller must be included in the records. The RSBD should be cited for noncompliance on the inspection report if any of this information is missing.

If the RSBD has acquired dogs from a pound, the dealer must have acquired a signed statement from that pound certifying that the pound has met the holding requirements for that dog as required by Section 2.133(a) of the regulations. The RSBD must obtain such a statement for each dog acquired from a pound, though all dogs acquired at any one time may be placed on the same certification statement.

If the records show that an unlicensed person has sold 25 or more dogs and/or cats to the RSBD in a year, that person is not exempt from the licensing requirement. The name and address of this unlicensed dealer should be submitted to the Regional Office (RO) by the inspector, and the RO will determine the necessary course of action. If the RSBD acquired one or more dogs from an unlicensed person, but did not acquire the certifications required by Section 2.132(d), the RSBD should be cited for this on the inspection report.
Choosing Dogs for Traceback

Following every inspection of an RSBD facility, the inspector must conduct tracebacks on a sampling of the dogs acquired by the dealer during the time period since the last inspection. In general, dogs should be chosen for traceback on a random basis. However, all dogs whose acquisition appears suspicious should be traced back. Also, the dogs should not all be from the same seller, but dogs sold by different persons should be chosen whenever possible.

The number of tracebacks conducted will depend upon the circumstances.

◆ If four or fewer dogs were acquired in the quarter, conduct tracebacks on each of those dogs.

◆ If between 5 and 100 dogs were acquired in the quarter, conduct tracebacks on at least 4 dogs, or 10 percent of all the dogs acquired during that period, whichever is greater.

◆ The maximum number of tracebacks to conduct under normal circumstances is 10. So if more than 100 dogs were acquired in the quarter, the inspector would still only conduct 10 tracebacks.

In some instances, the traceback of 100 percent of the acquired dogs may be required. This will be determined by the RO, and the inspector will receive specific instructions via their supervisor.

SAFETY

Most of the sellers you will be checking on are not accustomed to visits by APHIS, and some may resent the imposition of the Federal Government into any area of their life.

If you believe you cannot safely conduct a traceback, contact your SACS. With your SACS, a determination can be made whether a second inspector should accompany you to the seller’s address, or whether you should attempt to conduct the traceback by telephone only. You should not place yourself in an unsafe situation.

If you determine that you should conduct the traceback by telephone, enter a brief statement into the “Comments” section of the traceback form explaining that the traceback was conducted (or attempted) by telephone due to employee safety concerns. If you are unable to contact the seller by telephone, the traceback should be documented as “unsuccessful.”

Every attempt must be made to trace the dogs to the person who originally sold it. When practical, most tracebacks should be conducted by visiting the seller listed on the RSBD records. However, tracebacks can be conducted by telephone under the following circumstances:

◆ The seller is a licensed dealer.
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

◆ The seller is a person who is known to the inspector, such as a dog breeder that the inspector recognizes from a previous traceback.

◆ The seller is a pound.

Copies of all tracebacks to be conducted must be sent to the RO along with the inspection report on the RSBD. Inspectors should conduct all tracebacks for seller located in their inspection areas. If a traceback leads to an address outside of the inspector’s area, the inspector must send the traceback form indicating an incomplete traceback to the RO. The RO will then forward this information to the appropriate inspector in whose area the seller is located. In those instances where a seller is in another Region, the RO will send the information to that Region, and information on the traceback will be recorded in the RO in order to follow up on the traceback.

When conducting a traceback, the inspector should ask the seller open-ended questions so as not to indicate the answers that are being sought. For example, the inspector should ask: “Where did you obtain this dog?” rather than asking, “Did you breed and raise this dog yourself?”

Obtain the following information from the seller:
1. Did the person listed on the records as the seller actually sell the dog or cat?
2. If that person verifies being the seller, did he or she breed and raise the dog themselves?
3. If the seller says they bred and raised the dog, is there evidence of a kennel on the premises? If not, where did the seller raise the dog?
4. Did the seller provide the required certifications to the RSBD?
5. If the seller did not breed or raise the dog, where did they get the animal?

If the seller is a private individual, the above information must be collected and recorded on the traceback form.

If the seller is another licensed dealer, the second dealer’s records should be examined to verify the sale to the RSBD. If the second dealer is also a RSBD, a traceback now needs to be conducted for this seller listed on this RSBD’s records. This information must also be recorded on the traceback form.

If the seller is a pound, the inspector must either call or visit the pound and confirm the sale of the dog. The inspector should also confirm that the certification statement provided to the RSBD for that dog is accurate.
If, while conducting a traceback, the inspector is unable to verify the sale of the dog, e.g., the person listed as the seller did not sell the dog, or the address of the seller listed on the records does not exist, this information should be included on the traceback form, and the traceback should be listed as unsuccessful.

All tracebacks must be completed within 30 days of the inspection of the RSBD, or for referred tracebacks, within 30 days of the time the traceback request is received. The inspector must notify his or her SACS if all the tracebacks cannot be completed in that time.

**The Traceback Form**

A separate traceback form must be completed by the inspector for each dog or cat that the inspector chooses to have traced. The form must be filled out electronically.

The inspector must assign a traceback number to each traceback form, unless otherwise instructed. The traceback number begins with the RSBD’s customer number, which is followed by another number assigned in sequential order.

**EXAMPLE**

If the RSBD has customer number 9999, the inspector would assign traceback number 9999-1 for the very first traceback, followed by 9999-2, then 9999-3, etc., in sequence, for each subsequent traceback.

**NOTICE**

When conducting a 100 percent traceback, the inspector may include on a single traceback form all the dogs sold to the RSBD by one supplier. When doing this, each dog’s ID number must be entered, and a sequence of traceback numbers, one for each dog, must be included on the form. For example, if a supplier sold 10 dogs to the RSBD, the traceback numbers on the form would run from 9999-1 to 9999-10. The dog ID numbers would be listed as 4263-4272, if sequential. If not sequential, each individual dog number should be entered.

The inspector conducting the traceback must indicate on the traceback form whether the traceback was successful or unsuccessful.

A successful traceback can be one of the following:

- The seller has confirmed that he sold the dog and that he has bred and raised the dog on his premises. Some confirmation of the seller having actually bred the dog should also be made, e.g., there is a kennel on the premises.
- The seller is a pound and has confirmed the sale.

An unsuccessful traceback can be one of the following:
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

◆ The address listed for the seller does not exist, the seller’s name is fictitious, or the seller is not at that address.
◆ The dog was not bred and raised by the seller.
◆ The seller listed on the records claims he did not sell the dog.

The inspector should also indicate in the Comments section how the traceback was conducted, i.e., by phone or visit, and include a brief description of the results of the traceback, i.e., “Mr. Jones told me he did not breed and raise the dog, but got it from a local pound.” The RO will typically request an investigation by IES for unsuccessful tracebacks.

If the inspector is unable to contact the seller and the traceback cannot be completed, the traceback should be listed as unsuccessful, and the inspector should note this in the Comments section on the traceback form and submit it to the RO. The RO will research and check accuracy of the information and consult with the SACS and inspector before determining what course of action to take.

When a traceback is unsuccessful, the RSBD’s inspector may need to write an additional inspection report on the RSBD, citing the RSBD for noncompliance with Section 2.132(d) for acquiring the dog or cat from an unlicensed and nonexempt source, and/or citing Section 2.133 for failure to provide the recipient(s) with the appropriate certification. The inspector should contact their SACS to determine if another inspection report with the citation should be written.

Special Circumstances
A random source Class B dealer who operates a private or contract pound or shelter must comply with the following:

◆ Facility
  ▶ Pound/shelter/animal housing facility must not be adjacent to the licensed facility, i.e., no common walls, and
  ▶ Pound/shelter must be physically separated from the licensed facility
◆ Records
  ▶ Maintain accurate and complete records separately in accordance with Sections 2.75 and 2.76, unless the animals are lost or stray
  ▶ Provide the following information for lost or stray animals:
    ⇒ An accurate description of the animal
    ⇒ How, where, when, and from whom the animal was obtained
◆ Transferring the dog/cat to the “B” dealer:
Specific Types of Inspections
Random Source Dog and Cat Dealer Inspection

- Hold the animal for 10 full days, **not** including the day of acquisition and time in transit
- The animal record **must** contain all the information listed above, including:
  - How long the animal had been at the pound/shelter before transfer to the dealer’s licensed facility, and
  - The date the animal was transferred to the dealer’s licensed facility

**Certification**

A dealer **must** provide the recipient of a random source dog and/or cat certification that contains all the information required by the regulations.

Certification for a random source dog/cat **must** contain the following information:

- Name, complete address, USDA license number, and signature of the dealer
- Name, complete address, USDA license or registration number, if applicable, and signature of the recipient
- A description of each animal which includes:
  - Color and any distinctive markings
  - Date of birth or approximate age
  - Official USDA-approved identification number
  - Sex
  - Species and breed or type (for mixed breeds, estimate the two dominant breeds/types).

**NOTICE**

If the description information is provided by a prior dealer and attached to the certification, then **only** the official ID number is required.

- Name and complete address of the person, pound, or shelter from which the animal was acquired
- An assurance that the person, pound, or shelter was notified that the animal might be used for research or educational purposes
- Date dealer acquired the dog/cat
- If dog/cat acquired from a pound, shelter, or research facility, a signed statement that the pound or shelter held the animal for the required five days. This statement **must**:
  - Describe the animal by its USDA ID number assigned by the dealer,
Specific Types of Inspections
Research Facility Operating a Pound or Shelter

- Be incorporated into the dealer certification at the time of acquisition, or
- Be made separately and attached to the certification letter. If made separately, it must include a description of the animal as required in the certification. A photocopy is regarded as a duplicate original.

The original certification must accompany the shipment of any random source dog/cat.

A random Class B dealer who obtains a random source dog/cat from another random Class B dealer must obtain and attach the original certification to the certification which he/she provides to the recipient of the animal.

A random Class B dealer must keep, maintain, and make available for APHIS inspection, a copy of the certification for at least 1 year following disposition of the animal.

Research Facility Operating a Pound or Shelter

A research facility operating a pound or shelter must have separate premises and records for the two businesses.

Physically Separate Businesses

The pound or shelter must be physically separated from the research facility. This means:

- The two businesses must not be on the same premises, and
- The animal housing facility of the pound/shelter must not be adjacent to the research facility.

Records

The dog and cat records for the research facility must be maintained separately from the pound/shelter records.

For all dogs and cats, except lost or stray dogs, the pound or shelter must make, keep, and maintain the following records:

- A description of each animal
- Date dog/cat was acquired
- Date of birth or approximate age
- Disposal date
- Method of disposition, such as:
  - Death
Specific Types of Inspections
Research Facility Operating a Pound or Shelter

- Donation
- Euthanasia
- Sale

- Name and complete address of the buyer or person to whom the dog/cat was given is licensed or registered
- Name and complete address of the seller or donor, USDA license or registration number if seller/donor is USDA licensed or registered
- Official USDA tag number, tattoo, or microchip number, if applicable
- Vehicle license number, driver’s license number, and State of issuance of each if seller/donor is not USDA licensed or registered
- The color and any distinctive markings
- The method of transportation, if applicable, including:
  - Name of the initial carrier or intermediate handler, or
  - Name of the owner of the privately owned vehicle
- The sex
- The species and breed or type

If the vehicle license number and driver’s license number cannot be obtained, the record must contain:

- An acceptable reason for not obtaining this information, and
- At least two of the following:
  - Directions to the premises of the seller/donor
  - Official identification card number
  - Phone number

For lost or stray dogs/cats, the pound/shelter records must contain the following:

- An accurate description of the dog/cat
- Date the dog/cat was transferred to a dealer, if applicable
- From whom the dog/cat was obtained
- How long the dog/cat was held before being transferred to a dealer, if applicable
- How the dog/cat was obtained
- Where the dog/cat was found
- When the dog/cat was obtained
Search Inspection

A search is an investigation of anything relating to unlicensed activity.

**Subjects of Searches**

Subjects of searches include, but are not limited to:

- A non-registered research facility purchasing regulated animals
- Involuntarily terminated licensees or registrants (i.e., canceled due to non-renewal, suspended due to consent decisions and orders)

**NOTICE**

Conduct the search within 60 days of the termination of the license, if possible.

- Persons exhibiting regulated animals
- Persons using regulated animals for rides
- Previously identified violators

Use good judgment to decide when you have made a reasonable effort to verify unlicensed activities.

Examples of possible ways to verify unlicensed activity are:

- Checking dealer or broker records
- Checking newspaper ads
- Checking the Internet
- Communicating with other inspectors
- Making phone calls
- Visiting the facility

**Sources of Information**

Sources of information include, but are not limited to:

- Advertisements
- Animal protection groups
- Anonymous tips
- APHIS personnel
- City, county, or State agency
- General public
- Internet sites
- Newspaper/journal articles
Specific Types of Inspections
Search Inspection

◆ Other Federal agency
◆ State health certificates
◆ Whistle blower

Sources may provide information by the following methods:
◆ email
◆ Letters
◆ Personal contact
◆ Phone calls

**NOTICE**
The informant does not have to give his/her name. However, if the informant does give his/her name, do not give out the person’s name in order to maintain confidentiality.

**Information Follow-Up**
Decide if the information supplied to the Animal Care program involves a regulated activity or animal.

If the information does not involve a regulated activity or animal:
◆ Educate the informant about regulated activities/animals.
◆ Thank the informant for his/her interest in the welfare of animals.
◆ Refer the informant to the appropriate office/agency, if known. Possible referral agencies include:
  ▶ U.S. Fish and Wildlife Service
  ▶ NIH-OLAW
  ▶ AAALAC
  ▶ State wildlife agency
  ▶ Local animal control
  ▶ National, State, or local humane society
  ▶ State animal welfare agency
◆ Take no further action.

If the information does involve a regulated activity or animal:
◆ Thank the informant for his/her interest in the welfare of animals.
◆ Complete the top portion of a Search sheet. (See USDA, APHIS, Animal Care Search for Unlicensed Activity Worksheet on page A-47)
◆ Determine if the information applies to a person in your territory.
If the information applies to a person, business, or research facility not in your territory:

- Tell the informant that the facility is **not** in your area, but that you will forward the information to the Regional Office for distribution to the appropriate inspector.
- Give the informant the Regional Office phone number for follow-up.
- Forward the Search sheet and any supplemental information (e.g., copies of records, invoices, sale bills) to your SACS or Regional Office.

If the information applies to a person in your territory, conduct a search.

**Conducting the Search**

Verify the information received by:

- Contacting the authorized representative
- Gathering additional information, such as:
  - Contacting witnesses
  - Assessing records
  - Newspaper or journal articles
  - Classified ads
  - Information off the Internet
  - Internet web site addresses

If regulated activities are **not** being conducted, then complete a Search sheet and submit your findings to your SACS or Regional Office.

If regulated activities are being conducted, then:

- Explain that the activity requires a USDA license or registration.
- Discuss with the authorized representative all the pertinent portions of the AWA and regulations and standards.
- Request a decision about the continuation of this activity.
- Decide whether or not to request permission to inspect the facility.

---

**NOTICE**

Situations where you may decide **not** to request permission to inspect include, but are **not** limited to:

- The person is **not** able to make a decision about obtaining a license at that time.
- The authorized representative is uncooperative and threatening.
- Give or have the Regional Office send an application packet to the authorized representative.
Specific Types of Inspections

Search Inspection

◆ If you give the person an application packet, let the Regional Office know.

**Dealer or Exhibitor**

If the authorized representative allows an inspection of the facility, complete an inspection report using the agency standard word processing application, unless you are able to have the Regional Office enter the person into ACIS, as follows:

◆ Classify the inspection as “Routine” if the person decides not to conduct further regulated activities.

◆ In the narrative:
  ◆ Note that this was a “Search” inspection.
  ◆ Document all noncompliant items – Do not include a correction date(s).
  ◆ Include a citation of Section 2.1(a)(1)–Conducting Regulated Activities Without a License, and describe the regulated activity.
  ◆ State the following at the end of the inspection report: “No regulated activities may be conducted until USDA license is obtained.”

◆ Classify the inspection as “Prelicense Inspection #1” if the authorized representative decides to apply for a license, and follow procedures for a prelicense inspection (see Required Inspection Procedures).
  ◆ Include a citation of Section 2.1(a)(1)–Conducting Regulated Activities Without a License, and describe the regulated activity.

**NOTICE**

Have the applicant complete an APHIS Form 7003A—Application for New License on page A-11 and TIN form, and send the application fee to the appropriate Regional Office.

If, after the inspection, the authorized representative refuses to sign the inspection report, send the report to him/her by regular and certified, return receipt mail.

**Research Facility**

If the authorized representative allows an inspection of the facility, complete an inspection report using the agency standard word processing application, unless you are able to have the Regional Office enter the facility into ACIS, as follows:

◆ Classify the inspection as “Routine” if the research facility decides not to conduct further regulated activities.

◆ In the narrative:
Specific Types of Inspections
Search Inspection

- Note that this was a “Search” inspection.
- Document all noncompliant items—Do **not** include a correction date(s).
- Include a citation of Section 2.30(a)—Conducting Regulated Activities Without a Registration, and describe the regulated activity.
- State the following at the end of the inspection report: “**No** regulated activities may be conducted until USDA registration is obtained.”

If the authorized representative refuses to allow an inspection of the facility:

1. Inform the authorized representative that he/she or the research facility is noncompliant with the Animal Welfare Act by conducting a regulated activity **without** a license/registration.
2. Leave an application packet with the person, if possible.
3. Take photographs documenting the regulated activity, if you can do so safely.
4. Discuss how to proceed with your SACS.

If you decide **not** to conduct an inspection:

1. Inform the authorized representative that he/she or the research facility is noncompliant with the Animal Welfare Act by conducting a regulated activity without a license/registration.
2. Give or have the Regional Office send an application packet, if applicable, to the authorized representative.
3. Take photographs documenting the regulated activity, if you can do so safely.
4. Discuss how to proceed with your SACS.

**Post Search Procedures**
After conducting a search, ALWAYS:

1. Complete a Search sheet.
2. Enter the word processing inspection report into ACIS.
3. Submit the Search sheet with the word processing and ACIS inspection reports and/or memo to your SACS or the Regional Office following standard procedures.
4. If an inspection was conducted:
   A. Submit the inspection reports, and
   B. Discuss with your SACS if an enforcement action would be appropriate.
5. For a refusal of inspection:
A. Submit a memo describing the regulated activity being conducted and that an inspection was not permitted.

B. Discuss with your SACS if an enforcement action would be appropriate.

6. If you decided not to conduct an inspection:
   A. Submit a memo describing the regulated activity being conducted and indicating the reason why you did not conduct an inspection.
   B. Discuss with your SACS if an enforcement action would be appropriate.

7. Submit any photos taken of the regulated activity.

If the inspection report was completed using the word processing inspection report template, then you should:

1. Contact an ILA at the Regional Office.
2. Provide the ILA with the following information:
   A. Person, business, or research facility’s full name
   B. Complete business address
   C. Complete site address
   D. County, if known
   E. Business telephone number, including area code
3. Obtain the customer number, if available.
4. Replicate the ACIS database after you have been informed that the person/business/research facility has been entered into ACIS.
5. Enter the information exactly as it is on the word processing Inspection Report into the ACIS database.

**NOTICE**

Date of the actual inspection, date prepared, and date received should be the same as on the word processing inspection report.

6. Place the following statement in the narrative section: “This is an electronic version of the report dated xx/xx/xx.”

7. Send a copy of the ACIS Inspection Report to the person/research facility by regular mail or email.

8. Attach a copy of the ACIS Inspection Report to the word processing report.

9. Submit the Inspection Reports following your standard procedure.
**Follow-Up Procedure**

If a person/business/research facility you contacted on a search was conducting a regulated activity and he/she has **not** applied for a license/registration within 30 days, revisit the facility to determine if a regulated activity is still being conducted.

If the person is **no** longer conducting a regulated activity:

1. Complete and send a Search sheet to the Regional Office, or
2. Send a memo to the Regional Office documenting your findings.

If the person/business/research facility is still conducting a regulated activity:

1. If safe and appropriate, remind the authorized representative that a USDA license is required to conduct this activity.
2. Document the regulated activity by either:
   A. Conducting another inspection, if possible, or
   B. Completing another Search sheet, or
   C. Writing a memo detailing your findings
3. Take photographs, if possible.
4. Discuss how to proceed with your SACS.

**On the Road Inspection**

If you find an unlicensed exhibitor on-the-road, inform the exhibitor that:

1. A USDA license is required for the activity he/she is conducting.
2. All applicable AWA regulations and standards **must** be met at all sites.
3. He/she **cannot** exhibit until licensed.

Obtain the following information from the exhibitor:

1. Location of the home base or permanent facility which he/she returns to between tours.

**NOTICE**

A traveling exhibitor **must** have a home base or permanent site in order to get a license.

2. Animals currently housed at the home base or permanent site.
3. Name of any other Animal Care inspectors that the exhibitor has been in contact with and the results of that contact.

4. Ways to contact the exhibitor while on-the-road.

5. An itinerary.

If the exhibitor refuses to give you any information:

- Get vehicle license tag number, if possible, to obtain follow-up information
- Try to get contact information and itinerary from the manager, if applicable

**Licensing Process Started**

If the exhibitor chooses to start the licensing process, perform a prelicense inspection. During the prelicense inspection, be sure to:

- Collect the application fee or have the exhibitor send to the Regional Office
- Discuss all records required by the regulations, such as:
  - Acquisition and disposition records
  - Dog Exercise Plan
  - Health certificates
  - Nonhuman Primate Environmental Enhancement Plan
  - Program of Veterinary Care
- Document all pertinent information discussed on the inspection report
- Follow the procedure outlined in Dealer or Exhibitor
- Have the exhibitor complete an application and TIN form
- Inform exhibitor that the home base/permanent site must be inspected and be in compliance before a license will be issued
- Obtain itinerary (See Submission of Itineraries on page A-73)
- Obtain on-the-road contact information
- Obtain location of home base/permanent base
- Use TRA as the Site designation

If noncompliances are identified during the prelicense inspection, be sure to:

- Determine with the exhibitor when and where the next inspection will be conducted.
- Inform the exhibitor that he/she cannot exhibit until a license is obtained.
Inform the exhibitor that all noncompliances must be corrected prior to the next inspection.

Send the inspection report and all related paperwork with your weekly paperwork to the Regional Office.

If another prelicense inspection is required:
◆ Contact your SACS with this information
◆ Determine with your SACS who will contact the next inspector, if required

**Licensing Process Not Started**
If the exhibitor chooses not to start the licensing process:

◆ Inform the exhibitor that any further exhibition could result in an enforcement action
◆ Notify your SACS or Regional Office
◆ Obtain contact information and itinerary (if necessary, check with manager of venue)
◆ Reemphasize that he/she cannot legally exhibit without a USDA license

**Home Base or Permanent Site**
The exhibitor must have a home base or permanent facility.

If a home base or permanent facility has not yet been inspected, contact your SACS or Regional Office with the location and other pertinent information.

You should:
◆ Discuss the facilities available at this site
◆ Include the following or a similar statement on the Inspection Report: “All sites must be in compliance before a license will be issued.”
◆ Inform the exhibitor that a license will not be issued until all sites are in compliance with the regulations and standards
◆ **Not** complete the prelicensing process. (Do **not** state on the Inspection Report that “Applicant meets all requirements to be licensed” or accept the license fee.)
◆ Obtain contact information for the inspector at the home base/permanent site
◆ Obtain the location of this facility
Specific Types of Inspections
Traveling Exhibitor Inspection

**Final Prelicense Inspection**
If another prelicense inspection is **not** required, i.e., **no** noncompliances were cited and the exhibitor’s home base/permanent site has already passed inspection, then follow the standard procedure for completing the licensing process.

**Traveling Exhibitor Inspection**
Each inspector should develop a consistent method of conducting inspections of traveling exhibitors that ensures a thorough and accurate inspection.

**General Information**
Inspections of traveling exhibitors are different from inspections at the home facility. However, all of the applicable AWA regulations and standards **must** be met.

If you become aware that a traveling exhibitor is, or will be, performing in your territory:

- Check ACIS for the date and results of the last TRA inspection.
- Do **not** conduct an inspection if:
  - An inspection has been conducted within 90 days
  - The inspection had **no** noncompliances, and
  - There is no open complaint on the exhibitor
- If the traveling exhibitor was **not** inspected within 90 days and/or has a noncompliance, or there is an open complaint on the exhibitor, contact your SACS to determine if an inspection is needed.

**NOTICE**
Traveling exhibitors with elephants will be inspected by the Elephant Inspection Team at the travel site and at the home site.

**Admission to the Venue**
If the venue, e.g., theme park, State/county fair, Renaissance festival, or craft show has an admission gate:

1. Go to the admission gate.
2. Identify yourself in a professional manner.
3. State the purpose of your visit.

At most venues, you will **not** be required to pay admission. However, if an admission fee is requested ask to speak to someone in management.
If you need to pay admission charge the admission fee on your Purchase Visa (preferable), or pay cash/personal credit card (you will be reimbursed).

**NOTICE**

If you want to enter the venue to observe the exhibitor without him/her knowing you are there, pay the entrance fee in cash or personal credit card and you will be reimbursed.

**Conducting the Inspection**

Prior to the conducting the inspection:

- Contact the home inspector or the inspector who conducted the last TRA inspection if you have questions.
- Review prior inventories.
- Review several past inspections, including photos if available, in ACIS to determine the compliance history.

**General Inspection Requirements**

When inspecting a traveling exhibitor, some recommended items to evaluate/observe include, but are not limited to:

- A performance/act
- Adequate shelter and shade for animals housed outdoors
- Availability and use of exercise areas
- Chained or tethered animals for restraints which are too tight. If you have concerns about an animal, ask to see the animal up close, if you can do so safely.
- Plans for veterinary care if an animal becomes sick or is injured on the road
- Enclosures for adequate space during travel and at the temporary location (see Policy #6)
- Feeding schedules

**NOTICE**

Food deprivation may not be used for training.

- Food preparation and storage areas
- Fresh meat if required, ask about:
  - Sources of the meat while on the road
  - Storage
  - Method(s) of thawing
- Handling of the animals before contacting the authorized representative
Specific Types of Inspections
Traveling Exhibitor Inspection

◆ Health and well-being of all the animals, such as:
  ❖ Alertness and activity level
  ❖ Behavior
  ❖ Foot and hoof care
  ❖ Normal appearance
  ❖ Presence of wounds
  ❖ Signs of abuse
◆ Loading and unloading of animals
◆ Qualifications and training of the animal handlers
◆ Records (see Records)
◆ Security measures to protect the animals and the public, such as:
  ❖ Barrier fences or electric fences
  ❖ Night security
  ❖ Uniformed attendants
◆ Source and quality of the drinking water to make sure it is potable
◆ Sufficient number of employees to provide for the animal’s care
◆ Transport vehicles (see Transport Vehicles)
◆ Veterinary care and vet records (Veterinary Care (see Policy #3))

For animals in transit, go to Animals in Transit.

⚠️ CAUTION
Be alert and cautious around the animals. Remember that big cats spray, nonhuman primates spit and throw feces, and animals may be able to get their legs, paws/feet, trunk, etc. through the bars of their enclosures.

Dogs and Cats
If the dogs or cats live loose in the licensee’s traveling home, such as a house trailer or camper:

◆ Ask how the dogs/cats are transported in the conveyance to ensure that the travel standards are being met.
◆ Check the room(s) that the dogs/cats live in to ensure that it meets all primary enclosure standards.

Other Animals
When inspecting other wild and exotic animals, ensure that:
Specific Types of Inspections
Traveling Exhibitor Inspection

◆ All animals in the enclosure are able to make normal postural adjustments (stand on all fours, turn around, and lie down with limbs extended in a normal manner without obstruction from enclosure sides or having to extend feet through bars or feeder doors)

◆ Animals that normally engage in occasional vertical postures, such as bears and many felines, have sufficient vertical space available to accommodate these postures

◆ Animals have adequate freedom of movement, which includes the ability to exercise

◆ The opportunity to exercise includes, but is not limited to, the release of the animal(s):
  ❖ At least once a day for an appropriate length of time, unless otherwise justified
  ❖ Into a secure exercise pen, ring, or corral, or
  ❖ Into an area enclosed by an electric wire if monitored at all times, or
  ❖ Walked by a qualified handler, such as one trained for camels and domestic hoof stock

**NOTICE**

Periods of exercise should be in addition to regular performance and practice time. (see Policy #6 Space and Exercise Requirements for Traveling Exhibitors)

◆ The opportunity to exercise should be provided for animals whose on-the-road primary enclosures do not provide:
  ❖ Adequate height for animals that occasionally exhibit vertical postures
  ❖ Adequate space for sufficient freedom of movement

◆ The primary enclosures for other animals should have adequate space for each animal to express all non-injurious species-typical:
  ❖ Behaviors
  ❖ Grooming
  ❖ Postures/movement
  ❖ Social adjustments

Some information to remember when inspecting certain species:
◆ **Baboons and chimps** have sexual swellings that may resemble tumors.

◆ **Camels**:
  ❖ When males become excited, they may blow up a sac-like extension of the soft palate into a red “balloon” which hangs out from the corner of their mouth.
Specific Types of Inspections
Traveling Exhibitor Inspection

- Males in a “musth/rut” may:
  - Dribble urine
  - Drool, slobber, and froth at the mouth
  - Have rough/scaly hair coats
  - Lose a significant amount of weight
  - Make gurgling sounds

◆ Flying species should have sufficient unobstructed volume to enable movement by flying, and sufficient roosting space to allow all individuals to rest simultaneously. (see Policy #9)

◆ Large cats—females in heat:
  - Become very vocal
  - Roll around

◆ Pygmy hippos:
  - Like to wallow in mud
  - Secrete a clear, pink or brown viscous substance on the skin
  - Skin should appear soft and flexible
  - Skin should not be cracking or scaling
  - Should have a pond, or be wetted down regularly

◆ Species that, under natural conditions, spend a significant portion of time in water, such as capybaras, beavers, river otters, hippopotami, and tapirs, should have both dry and aquatic portions of the primary enclosure. Each portion should provide, at a minimum, sufficient space for normal postural and social adjustments.

◆ Tethered hoof stock should have tethers of sufficient length and arrangement to be able to comfortably lie down, get up, self-groom, and move about within a reasonable distance.

Veterinary Care (see Policy #3)
When inspecting traveling exhibitors, check for the following:

◆ A complete and current Program of Veterinary Care
◆ Plan for veterinary care if an animal becomes sick or is injured while on the road
◆ Documentation of chronic medical problems and the treatment, if applicable
◆ Environmental enhancement plan for nonhuman primates, which may need to be different than the plan at the home facility
Specific Types of Inspections

Traveling Exhibitor Inspection

- Exercise plan for dogs while in travel status, which may need to be different than the exercise plan at the home facility
- Expired medications
- Health and well-being of the animals
- Health certificates, if required
- Noncommercial diet approved for the large felids
- Medical records for any animal that was sick or injured while on the road
- Medical records for other animals, if kept by the exhibitor
- Required medical records for marine mammals

**Records**
A traveling exhibitor should have the records with him/her on the road. However, if the records are at another site or location, it is acceptable for the records to be emailed or faxed to the site of the inspection during the inspection. It is **not** recommended that the inspector allow the records to be faxed to him/her at a later date.

If the required records are not available, cite as a noncompliance under the appropriate Section.

A traveling exhibitor must have all the appropriate records for the regulated animals for up to 1 year from the disposal or euthanasia of the animals.

The following records, when applicable, **must** be available for review during an inspection on the road, as required by the regulations and standards:
- Acquisition records or a record of animals on hand for all regulated animals present
- Disposition records for all regulated animals that have left the current tour since it began

**NOTICE**
If an animal dies or is euthanized on the road, the date of death **must** be recorded, and details of the death should be maintained.

- Exercise plan for dogs
- Health certificates for dogs, cats, and nonhuman primates (if required see Policy #18)

**NOTICE**
It is recommended that an exhibitor in continuous travel obtain a new health certificate every 6 months.

- Individual medical records for marine mammals
Specific Types of Inspections
Traveling Exhibitor Inspection

◆ Necropsy records for marine mammals
◆ Nonhuman primate environmental enhancement plan
◆ Program of veterinary care appropriate for the animals being exhibited
◆ Water quality records for marine mammals

**NOTICE**
Copies of the original records are acceptable.

A traveling exhibitor should have the following records available, but should **not** be cited for a lack of them, or as stand alone citations:

◆ Health certificates for all other regulated species

**NOTICE**
This may be a State requirement. Refer the exhibitor to the proper State agency if he/she has questions.

◆ Health/medical records for all regulated animals present, such as:
   Necropsy records (other than marine mammals)
   Preventive medical treatments
   Records pertinent to current problems and treatments
   Records pertinent to existing chronic conditions

◆ Itinerary
◆ Last on-the-road inspection report
◆ License certificate
◆ Noncommercial diet approval for large felids (see Policy #16)

**Transport Vehicles**
Inspect transport vehicles for:

◆ Cleanliness
◆ Condition of the floor, i.e., rotting areas which could give way and/or allow entry of exhaust fumes
◆ Food storage areas
◆ Separation of species while in transit
◆ Space and height for the species transported
Specific Types of Inspections
Traveling Exhibitor Inspection

**NOTICE**
Trailers can **only** be 8 feet wide by Department of Transportation regulation. Therefore, the interior space will be 7 to 7.5 feet. Ask which animals are transported in the trailer and how they are arranged.

- Structural strength, such as:
  - Bent or warped surfaces
  - Loose fittings or grates
  - Protruding edges
- Vehicle safety features, such as:
  - Door latches and locks
  - Good tires
  - Proper hitches
  - Tires rated for the weight load carrying
  - Vehicle rated for the weight load carrying
- Ventilation and temperature when doors are closed
- Working temperature control systems, such as heaters, fans, and air conditioners

**Animals in Transit**
When in transit, regulated animals must be housed in enclosures that meet the transportation requirements for that species.

An animal is considered “in transit” when it is moving in a conveyance from:

- The home facility to a temporary location
- A temporary location to another temporary location
- A temporary location to the home facility

Stopping for short rest periods and food breaks for the drivers, handlers, and other people accompanying the animals is still considered “in transit.”

**NOTICE**
When stopped at a temporary location, the animals may be housed in enclosures that meet or exceed the applicable primary enclosure space requirement standards for **permanent** enclosures.

**Animal Races**
Examples of animals used for staged animal races include, but are **not** limited to:

- Camels
Specific Types of Inspections
Traveling Exhibitor Inspection

- Dogs (non-competitive), such as dachshund or Jack Russell Terrier races

**NOTICE**

Professional dog races, such as greyhound races, field trials, and tracking events are exempt.

- Gerbils
- Hamsters
- Pigs

While conducting your inspection, areas to pay special attention to include, but are **not** limited to:

- Availability of drinking water
- Plan to provide veterinary care if an animal becomes sick or is injured on the road
- For animals with riders, e.g., camel races, check for:
  - Condition of the equipment, i.e., **no** sharp edges, **no** broken straps, padding **not** thin or excessively worn, **no** broken buckles or fasteners
  - Proper fit of saddles, riding equipment, halters, or restraint devices. Some signs of improper fit include:
    - Hair loss
    - Irritated skin
    - Redness
    - Sores or abrasions
- Housing of the animals between races and overnight
- Individual tolerances of the animals
- Length of race for species being raced
- Methods used to make the animals run, i.e., are they methods used injurious to the animals, such as cattle prods, excessive physical force, or food/water deprivation
- Number of races per day for each animal
- Protective measures for climatic conditions
- Public barriers
- Rest periods for animals between races
- Security measures at night
- Species and age of animals being raced
Specific Types of Inspections
Traveling Exhibitor Inspection

**NOTICE**
If you have questions, or are unsure about a situation, use your professional judgment and/or call your SACS.

**Animal Rides**
See Animal Rides on page 4-6.

**Circus and Performing Animal Inspections**
Performing animal shows include, but are not limited to:

- Carnivals
- Commercials
- Educational exhibits
- Kangaroo boxing
- Magic shows
- Marine mammal shows
- Movies
- Promotional exhibits
- Stage shows
- Television shows
- Tricks
- Variety acts

Some areas to pay special attention to include, but are not limited to:

- Amount of time animals perform and are rested
- Plan for providing veterinary care if an animal becomes sick or is injured while on the road
- Handling of the animals
- Housing for animals between shows
- Methods or types of restraints used to control the animals

**NOTICE**
Drugs may **not** be used to control the animals.

- Methods used to make the animals perform
- Procedure for moving animals from housing to the performance area
- Procedure in the event of an animal escape or attack
- Public barriers
Specific Types of Inspections

Traveling Exhibitor Inspection

- Training and handling experience of the handlers and employees
- Transport enclosures and transportation vehicles
- Type and safety of public contact with dangerous animals

**NOTICE**

If you have questions or are unsure about a situation, use your professional judgment and/or call your SACS.

Circuses may be:

- Covered under one exhibitor’s license
- Composed completely of individually licensed exhibitors who work for the circus. In this case, a separate inspection report must be completed for each licensee.
- Composed of a combination of a licensed circus and individually licensed exhibitors. In this case:
  - Complete one inspection report for the licensed circus itself and include all the regulated animals covered under the circus’s license, and
  - Complete separate inspection reports for each individually licensed exhibitor

**NOTICE**

It is important to know which exhibitor’s license covers the particular animal you are inspecting. It is common for exhibitors/animal acts to travel with more than one circus in a touring season. If you have questions or are unsure about a situation, call your SACS.

**Observing the Circus or Performing Animal Show**

Prior to announcing your presence, you may want to watch an actual performance to observe the handling of the animals and the types of acts/tricks the animals are performing.

**Animal Inspection**

Areas to pay special attention to include, but are **not** limited to:

- Animal activities conducted between performances, such as rides or photo shoots
- Behavior of the animals
- Enclosures used to contain the dangerous animals
- Plan to provide veterinary care if an animal becomes sick or is injured while on the road
- Food and water
Specific Types of Inspections
Traveling Exhibitor Inspection

- Foot care
- Frequency and length of exercise provided to the animals whose enclosures do not meet the space requirements
- Health and well-being of the animals
- Housing for animals that are in quarantine, isolation, holding, or in off-exhibit areas
- Methods of restraint used to control the animals

**NOTICE**

Drugs may not be used to control the animals.

- Methods used to make the animals perform
- Pre-performance activities involving the public
- Procedure for moving animals in and out of the rings
- Public barriers and security during the performance
- Shade or other shelter for animals housed outdoors
- Space requirements for the animals, i.e., are animals housed in their transport enclosures? If so, do these enclosures meet the space requirements when not in actual transit?
- Training and handling experience of the handlers and employees
- Vertical space for animals that require it, such as bears, large cats, and nonhuman primates

**Facility Inspection**

Areas to pay special attention to include, but are not limited to:

- Diets being fed (quality, quantity, wholesomeness)
- Food preparation areas and storage facilities for the food
- Public barriers
- Security devices on the enclosures, such as locks, latches, or hinges
- Security measures at night
- Structural strength of the primary enclosures, exercise pens, and transport enclosures

**NOTICE**

Never enter a pen or enclosure unless absolutely necessary and the animal(s) are secured.

- Transport enclosures and vehicles, such as trucks and train cars, especially space and ventilation
**Petting Zoos**
See Petting Zoo Inspection.

**Photo Shoots**
See Photo Shoot Inspection.

**Inspection Reports**
When entering an inspection report for a traveling exhibitor **not** at his/her home site, ensure that:

- In the narrative section, insert:
  - Location of the inspection, i.e., city and State
  - Name of the circus, unit, or group, if applicable
- You use the TRA site designation in ACIS:
  - If the licensee does **not** have a TRA site already in ACIS, follow the procedure for having the Regional Office add a site
  - If the licensee has more than one TRA site, use the correct TRA site if it is in ACIS, such as the “Blue Unit” or the “Red Unit”

After the inspection, send a copy of the inspection report to your Regional Office or SACS, according to your Region’s administrative procedures.

**Itinerary**
See Traveling Petting Zoo Itinerary.
Chapter 5

Record-keeping

Contents

Computerized Records for Dogs and Cats  5-2
Microchip Approval  5-3
Records  5-4
   Required Dealer and Exhibitor Records  5-4
   Recommended Dealer and Exhibitor Records  5-5
   Required Research Facility Records  5-6
   Recommended Research Facility Records  5-9

DISCLAIMER
The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, the AC Policy Manual, the Required Inspection Procedures, standard procedures, or the inspector’s professional judgment. All inspection decisions must be justified by applicable sections of the regulations and standards.
Computerized Records for Dogs and Cats

A licensee who uses a computerized record-keeping system may request a variance from the requirement to use APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand on page A-8 and APHIS Form 7006–Record of Disposition of Dogs and Cats on page A-10.

A licensee cannot distribute his/her approved form for use by any other licensee. Each licensee with a computerized record-keeping system must request his/her own variance.

The variance request must:

- Be in writing
- Be sent to the appropriate Animal Care Regional Office
- Contain a description and sample of the computerized record-keeping system to be used
- Explain why the APHIS Form 7005/7006 is unsuitable to use

If the variance is denied, the licensee may request a hearing for the purpose of showing why the variance should not be denied. The denial remains in effect until a final legal decision is rendered.

The format of the computerized record-keeping form should:

- Be user friendly
- Contain all the required USDA information in a format similar to the APHIS 7005 or 7006
- Have limited types of other information which may not interfere with the USDA requirements
- Not use buyer and/or seller codes to meet the USDA requirements

The inspector may:

1. Review records on the computer screen or request a hard copy.

   NOTICE

   Presentation of the records by only a computer disc is unacceptable unless approved by the Regional Office.

2. Observe the retrieval and printing of the records.

If the inspector is unable to review the records for proper inspection, cite it on the inspection report under Section 2.126(a)(2).
Microchip Approval

The licensee/registrant must request and receive approval from the appropriate Regional Office to use a microchip implant as the official form of identification for dogs and cats.

The licensee/registrant must complete a State and Territory Identification Codes with the following information:

- Assurance that the following requirements will be met:
  - The microchip scanner must be readily available to the APHIS representative
  - Animal identification records must indicate the microchip number, location on the animal, and the name of the microchip manufacturer
  - Any animal with a microchip that goes to another USDA licensee or registrant must have an official tag/tattoo if a compatible scanner is not available at the receiving facility

- Location of the microchip on the animals

NOTICE

The placement of the microchip must be consistent from animal to animal.

- Manufacturer and/or model of the microchip and reader

You, the inspector, should follow these steps to complete the Request sheet:

1. The licensee completes the Request sheet.
2. The inspector reviews the Request sheet for accuracy.
3. The inspector recommends approval for the use of microchips for ID by signing the Request sheet.
4. Inspector or licensee sends the Request sheet to the regional office for final approval.
5. The Request sheet is approved by regional office.
6. A copy of the final approved Request sheet is maintained in the official file, a copy sent to the licensee, and a copy sent to the home inspector.
Records

A dealer, exhibitor, or research facility **must** have all required records for regulated animals purchased or otherwise acquired, owned, held, in his/her possession or control, transported, or disposed of.

**Required Dealer and Exhibitor Records**

Dealers and exhibitors **must** have the following records, when applicable, for review during an inspection:

- Acclimation statements for transportation
- Acquisition and disposition records
- Approved variances
- Attending veterinarian approved exceptions to the regulations or standards
- Documentation for all covered animals showing that current medical problems and existing chronic conditions are being addressed, and/or receiving proper veterinary care
- Health certificates for all covered animals when transported across State lines
- Program of veterinary care
- Record of animals on hand

**NOTICE**

Lack of this documentation may **not** be cited as a stand alone noncompliance, but **must** be related to the regulations and the condition of the animal.

**For Dogs and Cats**

- Certification for exempt sources of dogs/cats
- Certification for random source dog/cat disposition
- Exercise plan for dogs

**For Marine Mammals**

- Approved water and power emergency contingency plans for marine mammals
- Documentation of training of attendants or employees working with marine mammals
- Medical records for marine mammals
- Necropsy records for marine mammals
- Water quality records for marine mammals
For Nonhuman Primates

◆ Environmental enhancement plan for nonhuman primates

**Recommended Dealer and Exhibitor Records**

It is recommended that dealers and exhibitors have the following records, but they cannot be cited for lack of them:

◆ Current TB records for elephants (see Policy #1)
◆ Documentation of preventive medical treatments as listed in the program of veterinary care
◆ Documentation of training for all handlers of dangerous animals
◆ Emergency plan for dealing with animal attacks or escapes
◆ Microchip identification approval for dogs/cats
◆ Necropsy reports for elephants
◆ Noncommercial diet approval for large felids (see Policy #16)
◆ Health certificates for all other covered species (see Policy #18)

**NOTICE**

These reports **must** exist, but the dealer does **not** have to make them available to you.

A traveling exhibitor should have these additional records with him/her on the road, but may **not** be cited for a lack of them:

◆ Copy of license certificate
◆ Last inspection
◆ Last renewal application

**NOTICE**

These records are **not** specifically required by the AWA regulations and standards, **except** where applicable for marine mammals. Therefore, a lack of any of these records or inadequacy of these records may **not** be cited as a stand alone non-compliance, **except** for marine mammals, but may be cited in conjunction with related non-compliances identified. If unsure, discuss with SACS.
Required Research Facility Records

IACUC Records
A research facility must have the following records, if applicable, for review during inspection:

◆ Approved exemptions/exceptions to the regulations or standards (Annual Report requirement)
◆ Complaint investigations
◆ Minutes of the IACUC meetings, including:
  ❖ A list of members who were and were not present
  ❖ All the activities conducted by the IACUC at the meeting
  ❖ Any minority views (recommended, not required)
  ❖ Approval of the minutes (usually of the previous meeting) by the IACUC (recommended, not required)
  ❖ Substance of the deliberations of the IACUC, not just the decisions made
◆ Program of humane care and use
◆ Recommendations to the Institutional Official
◆ Records relating to animal activities, including:
  ❖ Annual review of protocols
  ❖ IACUC decisions on protocols and proposed changes
  ❖ Notification of Principal Investigator of decisions on protocols and proposed changes
  ❖ Notification of suspension of protocol
  ❖ Proposed significant changes to protocols
  ❖ Protocols
◆ Semi-annual reports, including:
  ❖ Facility inspection
  ❖ Report of program review to the Institutional Officer (IO), including minority views
  ❖ Review of humane care and use program
  ❖ Significant deficiency reports
◆ Verification of appointment of IACUC members by the Chief Executive officer (CEO)
**Personnel Records**
The research facility **must** adequately document the qualifications and training of personnel which may include, but **not** be limited to:

- Certificates of attendance at formal meetings
- Certificates of completion from relevant continuing education programs
- Curriculum vitae/resumes
- Diplomas or certificates from educational institutions
- Sign-up sheets from in-house training programs

**Animal Records**
A research facility **must** have the following records, if applicable, available for review during an inspection:

- Acclimation statements for transportation
- Acquisition and disposition records for dogs and cats
- Approved water and power emergency plans for marine mammals
- Attending veterinarian approved exceptions to the regulations or standards, usually part of an animal’s medical records
- Record of animals on hand for dogs and cats
- Certification for acquired random source dogs and cats
- Certification for exempt sources of dogs and cats
- Documentation for all other covered animals showing that current medical problems and existing chronic conditions are:
  - being addressed, and/or
  - receiving proper veterinary care
- Documentation of training of attendants or employees working with marine mammals
- Environmental enhancement plan for nonhuman primates
- Exercise plan for dogs
- Health certificates for dogs, cats, and nonhuman primates when transported across State lines
- Medical records for marine mammals
- Necropsy records for marine mammals

**NOTICE**
Lack of this documentation may **not** be cited as a stand alone noncompliance, but **must** be related to the regulations and the condition of the animal.
◆ Program of veterinary care
◆ Water quality records for marine mammals

**Annual Report**

Both you and the research facility should have a copy of the Annual Report.

You (the inspector) should verify that the research facility’s annual report is accurate, that is:

◆ All animal facilities are reported.
◆ Animals are reported in the correct column.
◆ IACUC-approved exceptions are reported.
◆ The number of animals reported is correct.
◆ There are justifications for all Column E animals.

Methods of verifying the animal numbers include, but are not limited to:

◆ Asking the research facility representative to demonstrate how the number of animals was determined
  ❖ A particular species, or
  ❖ A column from the annual report
◆ Counting the animals, if appropriate or feasible
◆ Review of:
  ❖ Acquisition records
  ❖ Animal ordering information, such as invoices or computer animal tracking systems
  ❖ Animals ordered in comparison to number of animals approved for a particular protocol
  ❖ Facility animal census records
  ❖ Internal billing records to PIs for animal housing/care
  ❖ Protocol medical or animal-usage records

Animals reported in Column B of APHIS Form 7023-Annual Report, should be those animals being bred, conditioned, or held for use in teaching, experiments, research, or surgery, but not yet used for such purposes.

All animals contained on the facility’s inventory on September 30 or the reporting year that were not used in a research project that year should be reported in Column B as being held for research purposes. Animals that were held but died during the year without being used for research purposes should also be reported in this column. Other animals held during the reporting year
but not present at the facility on September 30 should not be reported in this column. They should be reported by the facility which possesses them on September 30.

Facilities with breeding colonies should report their breeding animals and any offspring which are not being used for research purposes in Column B. This number should include those animals intended for sale but not used in a research project. Animals present at the facility which were used for research in previous years but were not used in the current year (e.g., retired animals) would also be reported in Column B.

Animals actually used for research purposes during the reporting year must be reported in Column C, D, or E, as appropriate, whether or not they are only being held on September 30 or are no longer at the facility on that date.

Refer to APHIS Form 7023—Annual Report of Research Facility on page A-18 for additional information about the annual report.

**Recommended Research Facility Records**

A research facility should have the following records, if applicable, available for review during an inspection:

- Acquisition and disposition records for animals, other than dogs and cats
- Animal logs
- Approval for large felid noncommercial diet
- Cage wash validation sheets
- Documentation of preventive medical treatments as listed in the Program of Veterinary Care
- General surgery records
- Health records
- Medical records related to protocols
- Microchip identification approval for dogs and cats
- Necropsy records
- Necropsy records for regulated animals, other than marine mammals
- Record of animals on hand for animals other than dogs and cats
- Record of attending veterinarian visits
- Room maintenance logs
- Standard operating procedures, if available
Surgical records related to protocols

**NOTICE**

These records are **not** specifically required by the AWA regulations and standards, except for marine mammals. Therefore, a lack of any of these records or inadequacy of these records may **not** be cited as a stand alone non-compliance, except for marine mammals, but may be cited in conjunction with related noncompliances identified. If unsure, discuss with SACS.
Chapter 6

Veterinary Care Requirements for Licensees

Contents

Attending Veterinarian 6-2
  Criteria 6-2
  Veterinary Authority 6-3
  Responsibilities 6-3
  Approvals 6-4
Written Program of Veterinary Care 6-7
  Requirements 6-7
Records 6-8
  Required Records 6-8
  Recommended Records 6-10
  Availability 6-11
  Traveling Exhibitors 6-11
Inspection Guidance 6-12
  General Information 6-12
  Adequate Veterinary Care 6-12
  Euthanasia 6-12
  Inspecting Dogs 6-14
  Medications and Medical Supplies 6-14
  Recognition of Pain and/or Distress 6-16
  Surgeries and Specialized Surgical Procedures 6-19
Documentation of Veterinary Care NCIs 6-20
  Four Part Citation 6-20
  Citing Section 2.40(b)(2) and/or 2.40(b)(3) 6-20
  Examples of Vet Care NCI Narratives 6-21

NOTICE

This Chapter applies to licensees only. For veterinary care requirements for Research Facilities, see Chapter 7. There are no veterinary care requirements for carriers and intermediate handlers.

DISCLAIMER

The Animal Welfare Inspection Guide is intended to be a reference document to assist the inspector. The Inspection Guide does not supersede the Animal Welfare Act (AWA), the AWA Regulations and Standards, the AC Policy Manual, the Required Inspection Procedures, standard procedures, or the inspector’s professional judgment. All inspection decisions must be justified by applicable sections of the regulations and standards.
Attending Veterinarian

A licensee must have an attending veterinarian (AV) to provide adequate veterinary care to their animals. [2.40(a), Policy #3]

An attending veterinarian is defined as a person who has:

- Graduated from an accredited Veterinary school or equivalent
- Received training and/or experience in the care and management of the species being attended, and
- Has direct or delegated authority for activities involving animals

The AV must have current credentials or a license to practice veterinary medicine in the state/territory in which he or she is located.

Criteria

A licensee must:

- Employ an attending veterinarian under formal arrangements [2.40(a)(1)]
- Communicate to the attending veterinarian timely and accurate information on the health, behavior and well-being of the animals [2.40(b)(3)]

In addition, if the attending veterinarian is part-time or a consultant arrangement, the formal arrangement must include: [2.40(a)(1), Policy #3]

- A written program of veterinary care (PVC)
- Regularly scheduled visits to the premises (recommended at least annually)

The AV may call in a consultant at any time and the consultant does not need to complete a PVC.

Multiple Attending Veterinarians

In some circumstances a facility may use more than one attending veterinarian. For example, a facility may use one attending veterinarian with specialized knowledge and experience for all nonhuman primates and another attending veterinarian for all other species present at the facility.

Formal arrangements and specific areas of authority must be documented in writing when the attending veterinarians are employed on a part time or consultant basis.

The documentation from each attending veterinarian should:
Veterinary Care Requirements for Licensees

Attending Veterinarian

- Clearly state which species the AV has authority over
- Fully describe the programs of veterinary care developed for these species and agreed upon by the AV and the facility
- Include regularly scheduled visits by the AV

Veterinary Authority

The AWA requires the licensee to assure the attending veterinarian has the appropriate authority to: [2.40(a)(2)]

- Ensure adequate veterinary care
- Oversee the adequacy of other aspects of animal care and use

It is the responsibility of the licensee to clearly understand and follow the recommendations of the attending veterinarian. The licensee may be cited for failure to follow: [2.40(a)(2)]

- The PVC approved by the attending veterinarian
- Husbandry or treatment recommendations from the AV that impact the health and well-being of the animals

Responsibilities

The attending veterinarian under the authority given to him/her by the licensee must:

- Establish and maintain the program of veterinary care [2.40(a) & 2.40(b)]
- Conduct regular visits to the premises, if the attending veterinarian is part-time or a consultant who is the AV [2.40(a)(1)]
- Develop and maintain a written program of veterinary care, if the attending veterinarian is part-time or a consultant [2.40(a)(1)]
- Provide guidance to personnel on all animal-related activities [2.40(b)(4) & (b)(5)]
- Establish and maintain the method(s) of euthanasia for the animals [2.40(b)(4), Policy #3]:
  - Licensees and registrants, in consultation with their attending veterinarians, can use methods of euthanasia that meet the definition of euthanasia in the Animal Welfare regulations, which allows for the use of humane methods that either:
    - Produce rapid unconsciousness and subsequent death without evidence of pain or distress, or
    - Utilize anesthesia produced by an agent that causes painless loss of consciousness and subsequent death
  - Appropriate methods may include, but are not limited to, those described in the “AVMA Guidelines for Euthanasia of Animals”
**Approvals**

**Dogs and Cats**

Approval of the attending veterinarian is required for the following:

- Housing of dogs and cats in indoor facilities or the sheltered part of sheltered facilities where the ambient temperature falls below 50 °F for those animals who are not acclimated to or cannot tolerate lower temperatures, such as: [3.2(a) & 3.3(a)]
  - Short haired
  - Sick
  - Young or aged
  - Infirm
- Outdoor housing of dogs and cats in the following categories: [3.4(a)(1)]
  - Dogs/cats not acclimated to temperatures prevalent in the area/region
  - Breeds that cannot tolerate the prevalent temperature extremes
  - Sick, infirm, aged or young dogs/cats
- Exercise plan for dogs [3.8]
- Exercise for dogs – Non-group housing of a dog(s) over 12 weeks of age if in the opinion of the AV, group housing would adversely affect the health or well-being of the dog(s) [3.8(b)(2)]
- Exemption to the exercise requirement for a dog(s) [3.8(d)(1)]

**Nonhuman Primates (NHPs)**

Approval of the attending veterinarian is required for the following:

- Ambient temperature of indoor housing and the sheltered portion of sheltered housing facilities for NHPs [3.76(a) & 3.77(a)]
- Relative humidity level of indoor housing and the sheltered portion of sheltered housing facilities for NHPs [3.76(b) & 3.77(b)]
- Outdoor housing of NHPs [3.78(a)]
- Outdoor housing of NHPs with shelters that do not provide heat to prevent the ambient temperature from falling below 45° F [3.78(b)]
- Ambient temperature in mobile or traveling housing facilities for NHP [3.79(a)]
- Environmental enhancement plan for NHPs, including AV approvals for: [3.81]
  - Social grouping [3.81(a)]
Veterinary Care Requirements for Licensees

Attending Veterinarian

- Isolation of NHPs that have or are suspected of having a contagious disease [3.81(a)(2)]
- Determination of compatibility of NHPs for social housing [3.81(a)(3)]
- Approval of singly housed NHPs to not be able to see/hear other NHPs [3.81(a)(3)]
- Special considerations for NHPs requiring special attention, including:
  - Infants & young juveniles
  - NHPs showing signs of psychological distress
  - Individually housed NHPs that cannot see/hear their own or compatible species
  - Great apes weighing over 110 lbs.
- Maintenance of NHPs in restraint devices for health reasons [3.81(d)]
- Statements of exemptions from participation in the environmental enhancement plan for individual NHPs [3.81(e)(1)]
- Restriction of water for NHPs [3.83]
- Approval of no food or water for NHPs during transport by a carrier or intermediate handler [3.86(c)]

Marine Mammals (MM)

Approval of the attending veterinarian is required for the following:

- Statement of exemptions to MM housing requirements, including:
  [3.104(a)]
  - Housing in smaller than required enclosures for nonmedical training, breeding or holding for more than 2 weeks
  - Housing in smaller than required enclosures for transfer for more than 1 week
- Feeding MM less than once per day [3.105(a)]
- Application of insecticides and other such chemical agents in primary enclosures housing MM [3.107(d)]
- Approval for the single housing of social MM [3.109]
- Approval to house newly acquired MM with resident animals [3.110(a)]
- Holding of MM in a medical treatment or medical training enclosure that does not meet the minimum space requirements for more than 2 weeks [3.110(b)]
Veterinary Care Requirements for Licensees

Attending Veterinarian

◆ Procedure for cleaning and/or sanitizing an enclosure which has housed a MM with an infectious or contagious disease [3.110(c)]

◆ Frequency of feeding for a MM in transit [3.115(b)]

◆ Transport plan for transport of a MM lasting more than 2 hours in duration [3.116(a)]

Other Animals

Approval of the attending veterinarian is required for the following:

◆ Procedure for sanitizing pens or runs using gravel, sand or dirt which had housed a Subpart F animal with an infectious or transmissible disease [3.131(b)]

◆ Use of noncommercial diets for large felids. (see Policy #16)

NOTICE

This approval is not specifically required by the AWA regulations and standards. Therefore, a lack of this approval may not be cited as a stand-alone noncompliance, but may be cited in conjunction with a related noncompliance identified. If unsure, discuss with your SACS.

The signature of a veterinarian is required on:

◆ Health certificates for dogs, cats and nonhuman primates transported:
  [2.78, Policy #18]
    ▶ Interstate
    ▶ In foreign commerce
    ▶ Intrastate by commercial carriers

NOTICE

Health certificates must be executed and issued by a licensed veterinarian.

◆ Marine mammal necropsy reports [3.110(g)(1)]

◆ Health certificates for transport of marine mammals [3.112(a)]

◆ Temperature acclimation certificates for transport of marine mammals [3.112(c)].

NOTICE

If you, the inspector, have a concern with the instructions or guidance the licensee has received from the attending veterinarian, discuss your concerns with your SACS.

Surgeries and Specialized Surgical Procedures

[THIS SECTION IS UNDER REVIEW.]
Written Program of Veterinary Care

A licensee that has a part-time or consultant attending veterinarian must have a written Program of Veterinary Care. [2.40(a)(1), Policy #3]

Requirements

The Program of Veterinary Care must:

◆ Be in writing using either the APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers on page A-2, or a document containing equivalent information

◆ Address the following:
  ❖ All covered species at the facility
  ❖ Vaccinations (species, juveniles vs. adults, list of vaccines, route schedule of when they are to be given, and whether they are to be given by the licensee or the AV)
  ❖ Parasite control (ectoparasites, blood parasites, intestinal parasites – including required testing intervals, drugs to be used for prevention and treatment with ages of animals, dosages, route and frequency)
  ❖ Detailed description of emergency care availability and contact information
  ❖ Detailed description of appropriate euthanasia to be used (personnel authorized to perform and the method)
  ❖ Detailed description of capture & restraint method(s). If more than one method is approved, there should be a detailed description of all approved methods

◆ Address other topics pertinent to each licensee

◆ Be reviewed and updated as needed for situations, such as:
  ❖ Change in the preventive medical program
  ❖ New attending veterinarian
  ❖ Addition of a new species of animal
  ❖ New location or site

◆ Be signed and dated by the attending veterinarian and the licensee whenever it is changed, or reviewed without a change
Records

A licensee must maintain records relating to the veterinary care of their animals, and medical records for marine mammals.

**Required Records**

**All Regulated Species**
A licensee must maintain the following records requiring veterinary approval for all regulated animals, when applicable:

- Acclimation statements for transportation [3.13(e), 3.35(c), 3.60(c), 3.86(e), 3.112(c3.136(c)]
- Attending veterinarian approved exemptions
- Written program of veterinary care for part-time or consulting attending veterinarian [2.40(a)(1)]

**Dogs and Cats**
In addition to the required records listed above, the following records requiring veterinary approval are required for dogs and cats, when applicable:

- Exercise plan for dogs [3.8]
- Health certificate for transport [2.78(a), Policy #18]
- Approval for acclimation to lower temperatures for:
  - Sheltered housing [(3.3)(a)]
  - Outdoor housing [(3.4)(a)(1)]
  - Mobile/traveling housing [(3.5)(a)]
- Attending veterinarian approved exemptions

**Nonhuman Primates**
In addition to the required records listed above, the following records requiring veterinary approval are required for nonhuman primates, when applicable:

- Environmental enhancement plan [3.81]
- Health certificates for transport [2.78(a), Policy #18]

---

NOTICE

The Supplemental Program of Veterinary Care Instructions (See APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers on page A-2) may be used to document the attending veterinarian’s visit.
Approval for acclimation to higher temperatures for
- Sheltered housing [(3.77)(a)]
- Outdoor housing [(3.78)(a) & (b)]
- Mobile/traveling housing [(3.79)(a)]
Humidity levels for:
- Indoor housing [(3.76)(b)]
- Sheltered housing [(3.77)(b)]
Attending veterinarian approved exemptions

**Marine Mammals**
In addition to the required records listed above, the following records requiring veterinary approval are required for marine mammals, when applicable:

- Health certificates for transport [3.112(a)]
- Individual marine mammal medical records [3.110(d)]
- Necropsy records [3.110(g)]

Individual marine mammal medical records **must** be kept, and include the following information, at a minimum: [3.110(d)]

- Animal identification/name
- A physical description, such as:
  - Identifying markings
  - Scars
- Age
- Sex
- Physical examination information including, but not limited to:
  - [3.110(d)(2)]
    - All diagnostic test results
    - Documentation of treatment
    - Identification of all medical and physical problems
    - Length
    - Physical examination results by body system
    - Proposed plan of action for medical/physical problems
    - Weight
- Visual examination information [3.110(f)]
Individual animal medical records must be kept at the facility where the marine mammal is housed, and available for APHIS inspection. [3.110(d)]

A copy of the individual marine mammal’s medical/health record must accompany the animal if it is transferred to another facility, including contract and satellite facilities. [3.110(e)]

**Marine Mammal Necropsy Reports**
The preliminary necropsy report must: [3.110(g)(1)]

- Be prepared by the veterinarian conducting the necropsy
- List all pathological lesions observed

The final necropsy report must include: [3.110(g)(1)]

- All gross findings
- All histopathology findings
- A pathological diagnosis
- Results of all laboratory tests performed

Necropsy reports must be: [3.110(g)(2)]

- Available for APHIS inspection
- Kept for 3 years
- Maintained at the home facility of the marine mammal, AND
- Maintained at the facility where the marine mammal died, if different than the home facility

**Recommended Records**
A licensee should maintain the following records to demonstrate that he/she is providing an adequate program of veterinary care, when applicable:

- Animal observation and treatment logs which could include:
  - Documentation of an acute or chronic medical issue
  - Documentation of contact with the attending veterinarian
  - Treatment prescribed by the attending veterinarian
  - Treatment records, i.e. dates and times of treatment if applicable
  - Results of treatment
- Attending veterinarian approval of noncommercial diet for large felids
- Enrichment logs for NHPs
- Feeding of young animals, such as bottle feeding
- Vaccination & Preventive Health records (individual animal or group/litter)
- Necropsy records
- Surgery records
- Euthanasia records
- Cage wash validation sheets
- Room maintenance logs
- Standard operating procedures, if available

A lack of any of these records or inadequacy of these records may not be cited as a stand-alone noncompliance, except for marine mammals. However, the citation of inadequate veterinary care for a sick animal may include a reference to the lack or inadequacy of veterinary care records, when appropriate. If unsure, check with SACS.

**Availability**

Required veterinary care records must be readily available to APHIS officials for review. [2.126(a)(2)] Records can be maintained at the Veterinary clinic as long as they are available to the inspector on request.

Required veterinary records must be held: [2.80]

- By dealers and exhibitors for at least 1 year after the animal’s disposition or death or as required by APHIS, OR
- Longer, if required by other applicable laws or policies

**Traveling Exhibitors**

Traveling exhibitors should have the appropriate veterinary care records for animals, and medical records for marine mammals with them on the road, as detailed in this Section. See Traveling Exhibitor Inspection on page 4-58 for more information.

Traveling exhibitors should retain all required veterinary care and health/medical records for 1 year after the disposal or euthanasia of the animal(s). [2.80]
Inspection Guidance

General Information
All of the covered animals and the facility’s Program of Veterinary Care and veterinary care practices and records should be thoroughly reviewed during the inspection. The information in this section is provided for your guidance but all citations must be based on the Regulations and Standards. If you are unsure, you should use your professional judgment and/or contact your SACS.

Adequate Veterinary Care
An animal shall be considered to have received adequate veterinary care if it has been:

- Examined and evaluated by a qualified veterinarian (either the attending or a consulting) in a timely manner, and
- Prescribed a treatment plan which is appropriate for the species involved, potentially including further observation without treatment if appropriate
- Treatments have been administered as prescribed

The outcome of the treatment is not the determining factor for the adequacy of veterinary care, provided that the care is in keeping with appropriate standards of veterinary care.

If the treatment plan provided was not adequate, appropriate or timely, you, the inspector, may contact your SACS for additional guidance if needed.

Euthanasia
Euthanasia is the humane destruction of an animal accomplished by a method that produces rapid unconsciousness and subsequent death without evidence of pain or distress, or a method that utilizes anesthesia produced by an agent that causes painless loss of consciousness and subsequent death.

All methods of euthanasia should:

- Be listed in detail on the Program of Veterinary Care
  - If a euthanasia agent is being administered by somebody other than the AV or other veterinarian, this should include agent, dose, and route.
- Be approved by the attending veterinarian
- Specify for which species it is to be used
- Clearly state who has been trained and is qualified to perform the procedure
Be sufficiently detailed to ensure it is being done in a manner that constitutes adequate veterinary care and meets the Part 1 definition of euthanasia

**Acceptable Methods of Euthanasia**

The method of euthanasia should be evaluated to ensure that:

- It is as an acceptable method of euthanasia
- Licensees and registrants, in consultation with their attending veterinarians, can use methods of euthanasia that meet the definition of euthanasia in the Animal Welfare regulations, which allows for the use of humane methods that either:
  - Produce rapid unconsciousness and subsequent death without evidence of pain or distress, or
  - Utilize anesthesia produced by an agent that causes painless loss of consciousness and subsequent death
- Appropriate methods may include, but are not limited to, those described in the “AVMA Guidelines for Euthanasia of Animals”
- The person performing the euthanasia, if not a veterinarian, is qualified and has the proper training

**Unacceptable Methods of Euthanasia**

Certain methods of euthanasia are not appropriate veterinary care. If a licensee euthanized an animal using an unacceptable method for that species, the licensee should be cited for failure to provide adequate veterinary care under 2.40(b)(2) or 2.40(b)(5).

**Use of Euthanasia as a Means of Veterinary Care**

When you, the inspector, cite an individual animal(s) for veterinary care problems, that animal(s) must be examined by a veterinarian, or at a minimum, the veterinarian must be consulted. Euthanasia may be performed only if the veterinarian determines that euthanasia is an appropriate treatment option for that animal.

If an individual animal is cited for a veterinary care problem and the licensee euthanizes the animal him/herself prior to having a veterinarian examine or be consulted with to specifically approve the euthanasia of the animal, you, the inspector, should cite the licensee for:

- failure to provide adequate veterinary care under 2.40(b)(2) or 2.40(b)(5), and
- failure to give the AV appropriate authority under 2.40(a)(2)
Inspecting Dogs

For all routine inspections, you, the inspector, should:

◆ Ask the licensee to pull from the enclosure any dog showing signs of a medical issue if you need to have a closer look and take photos and/or a video to document any veterinary noncompliance.

◆ Ask the licensee to pull any dogs that were previously identified as having a medical issue to recheck the dog if you need a closer look, and take photos and/or a video to document the dog’s condition.

◆ Inspect the entire dog for medical issues; do not just focus on a single specific area.

◆ Check for proper identification.

◆ Select a few random dogs and check their mouths, ears, eyes, skin, and general condition.

For all prelicense inspections, you, the inspector, should:

◆ Ask the applicant to pull from the enclosure any dog showing signs of a medical issue if you need to have a closer look.

◆ Ask the applicant to pull any dogs that were previously identified as having a medical issue to recheck the dog if you need a closer look.

◆ Inspect the entire dog for medical issues; do not just focus on a single specific area.

◆ Select 10 percent of the remaining dogs for the applicant and check for medical issues associated with their mouths, ears, eyes, skin, general condition, etc. If you identify a veterinary care issue that would normally be cited during a routine inspection, then it must be cited on the inspection report for the prelicense inspection.

NOTICE

Remember to use proper biosecurity measures. See Biosafety Measures on page 3-5.

Medications and Medical Supplies

You, the inspector, must ensure that all medications and medical supplies at licensed facilities are maintained and used in a manner that is consistent with providing adequate veterinary care and is considered acceptable veterinary practice. [2.40, Policy 3]

When assessing the facility’s use of drugs and medical supplies, verify that:

◆ The licensee has directions for appropriate use of all medications and medical supplies from a licensed veterinarian. This information:
 veterinary care requirements for licensees

inspection guidance

- Should include name and concentration of the medication, the instructions for use, dose, frequency, and route of administration
- May be located on a prescription label directly on the product or documented in writing from a veterinarian, as long as the information is readily accessible, understandable, and available for use at the facility

* All medications and medical supplies are:
  - Stored within manufacturers recommended humidity and temperature range
  - Protected from light (if required)
  - Labeled appropriately, including the drug name, concentration, and expiration date if transferred out of the original container
  - Stored in a manner that prevents contamination

* Expired medications or medical supplies:
  - Are NOT used for covered animals
  - IF present at the facility for non-covered use, they are:
    - Clearly labeled “expired” and
    - Separated from other medications and medical supplies.

**medications of special welfare concern**

Certain medications present special animal welfare concerns, particularly when used by non-veterinarians without the direct supervision of a veterinarian.

*Paralytics or Neuromuscular Blocking Drugs.* The use of paralytic or neuromuscular-blocking drugs without direct veterinary administration, oversight and care (including the use of general anesthesia and respiratory support) is **not** consistent with providing adequate veterinary care. [2.40(b)(2) & 2.40(b)(4)].

*Anesthetics & Controlled Drugs.* The use of anesthetics, including certain controlled drugs, by non-veterinarians without the direct supervision of a veterinarian, presents special welfare concerns and may not be consistent with providing adequate veterinary care.

If you identify anesthetics during an inspection, you should review available records of use and determine how the facility uses the drugs, including but not limited to:

* Species
* Purpose
Veterinary Care Requirements for Licensees
Inspection Guidance

- Administration practices, including dosing, route of administration, and names/doses of any drugs given with it
- Monitoring practices during and after administration
- Supportive care provided
- Procedures or handling occurring after administration
- Training and qualifications of individuals giving the drug(s)

Anesthetics, including certain controlled drugs, should:

- Be used in accordance with any local, state or federal laws
- Be used according to the written instructions for use by the veterinarian, including dose, frequency, and route of administration
- Only be used by personnel with appropriate training to ensure the anesthetics are used in a method that is consistent with providing appropriate veterinary care (see below)
- Be stored within manufacturers recommended humidity and temperature range and protected from light (if required)
- Be stored in a manner that prevents contamination

If the individual(s) administering the anesthetics is not a veterinarian or is not directly supervised by a veterinarian, then the individual’s training should be documented and approved by the attending veterinarian as part of the facility’s program of veterinary care.

When assessing the training and qualifications of an individual, you, the inspector, should inquire about his/her ability to:

- Monitor vital signs such as respiration, heart rate, and hydration status
- Recognize the effects of the drug, including signs of overdose or underdose
- Recognize when medical intervention is necessary and what steps to take

**Recognition of Pain and/or Distress**

It is often difficult to assess pain and/or distress in animals because of a lack of methods to validate and objectively measure the pain or distress. Additionally, not all animals demonstrate pain or stress in a similar manner. Basic biology, natural history, and individual variation all have a significant impact on the demonstration of clinical signs associated with pain. Listed in Table 6-1 are some possible signs of pain or distress.

However, presence of these signs does not necessarily mean the animal is in pain or distress. Or a lack of these signs also does not mean that the animal is not in pain or distress. If you see conditions that are likely painful and animals
are not showing clear signs, or if you are seeing signs that are suggestive of pain/distress and are unsure of why, you should contact your SACS or the appropriate Species Specialist for help with interpreting the situation.

**Table 6-1 Signs of Pain and/or Distress**

<table>
<thead>
<tr>
<th>Species</th>
<th>Species-Typical Signs of Pain</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Dogs</strong></td>
<td>Quiet, reluctant or unwilling to move, abnormal posture, lameness, lack of alertness, whimpering, groaning, howling, shivering, loss of appetite, increased respiration, growl or exhibit apprehension when approached, looking at, licking at, rubbing, or chewing a wound or potentially painful area, response elicited when touching or manipulating an area (withdrawal, whine, snap, etc.).</td>
</tr>
<tr>
<td><strong>Cats</strong></td>
<td>Ungroomed/unkempt appearance, greasy hair coat, quiet/withdrawn, apprehensive facial expression, loss of appetite, crying, hissing, hiding (often in litter box), crouching, or hunching, purring, tail flicking, response to handling (often aggressive but individuals may also purr in combination with other signs)</td>
</tr>
<tr>
<td><strong>Guinea Pigs</strong></td>
<td>Quiet, lethargy, decreased activity, decreased food and water consumption, anorexia, rough hair coat, reluctance to move, sunken eyes</td>
</tr>
<tr>
<td><strong>Hamsters and Gerbils</strong></td>
<td>Decreased activity, piloerection, ungroomed appearance</td>
</tr>
<tr>
<td><strong>Rabbits</strong></td>
<td>Inactivity, appear apprehensive or anxious, hunched appearance, hide, squeal or cry, possible aggressive behavior with excessive scratching and licking, facial expression (tightening of eye, cheek flattening, nostril tightening, pulling back whiskers, tightening ears)</td>
</tr>
<tr>
<td><strong>Nonhuman Primates</strong></td>
<td>May mask signs of pain, appearance of misery &amp; dejection, huddling or crouching, stops eating/drinking, sad expression, moaning, screaming, stops grooming, clenching of teeth, self-directed injuries, licking / chewing at injury, impaired use of limb, guarding behavior, dilated pupils</td>
</tr>
<tr>
<td><strong>Marine Mammals</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Cetaceans: dolphins, porpoises, &amp; whales</strong></td>
<td>Tend to mask illness/pain, arching/hunching, squinting, one or both eyes closed, regurgitation, inappetence, changes in behavior, unusual posture in pool, floating at surface or sinking to the bottom, reduced activity, animal isolating itself from others in pool, dull or excessive sloughing of skin</td>
</tr>
<tr>
<td><strong>Marine Mammals</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Pinnipeds: Seals, Sea Lions, Walrus</strong></td>
<td>Typically stotic, laying with flippers tucked to sides, decreased activity, reduced alert behavior, rubbing / biting affected areas, blinking, squinting / one or both eyes closed, decreased time in pool, social isolation, decreased appetite, excessive vocalization (especially walrus)</td>
</tr>
<tr>
<td><strong>Bears</strong></td>
<td>Typically stotic, may show decreased foraging / appetite, decreased locomotion, slow / reluctant to move, development of stereotypic behaviors</td>
</tr>
<tr>
<td><strong>Big Cats</strong></td>
<td>Typically stotic, may show slow / weak / abnormal gait, obvious lameness, reluctance to rise / ambulate, hair pulling, chewing / biting, quiet depressed attitude / lethargic, eyes frequently squinting or closed, Note: young cubs that are excessively handled may be too weak, cold, or exhausted to show overt signs of distress or pain</td>
</tr>
</tbody>
</table>
Signs of Distress
Possible signs of distress in an animal include, but are not limited to:

- Change in the animal's behavior
- Abnormal behavior, such as stereotypies
- Abnormal respiration (shallow, rapid, panting, etc.)
- Reduced grooming
- Runny, glassy or unfocused eyes
- Hunching or cowering in a corner of the cage
- Changes in body weight
- Absence of alertness or inattention to ongoing stimuli
- Vomiting
- Decrease in appetite and water intake
- Intense or frequent vocalizations
- Hair plucking and self-trauma
- Young animals dispersing from nests/dens (such as seen with heat stress)

It is important to remember that signs of distress such as the presence of stereotypic behaviors may outlast the cause for the development of those behaviors. If you observe abnormal behavior such as stereotypic behavior it is important to discuss the behavior with the facility to determine when the behavior began and what is being done (if anything) to address the behavior. If
you are unsure if an animal is exhibiting signs of either pain or distress, or whether the facility's response is adequate you should discuss with your SACS.

**Surgeries and Specialized Surgical Procedures**

If surgeries and/or specialized surgical procedures are being performed at a licensed facility, you, the inspector, should ensure that:

- The attending veterinarian has been consulted by the licensee
- Licensee is following all of the attending veterinarian's guidance
- All animals are receiving adequate veterinary care
- All procedures are being conducted consistent with standard veterinary practice

You, the inspector, should evaluate the qualifications and assess the adequacy of training of non-veterinarians conducting surgeries. Sample questions that you could ask the personnel about the procedures they are performing include but are not limited to:

- What are the signs of pain and distress and related-questions, such as:
  - Describe the drug regimen that will be used
  - Describe anticipated effect of the drug
  - Describe the signs of pain relief
  - Describe when further intervention may be necessary
  - What is the plan if the pain is not relieved
  - When will the veterinarian be called

- Describe the aseptic technique used, including use of gloves, masks, tools, and steps taken to appropriate clean the area and equipment between animals

- Describe the steps of the procedure to ensure they are following guidance from AV and verify appropriate veterinary care

- Which vital signs are being monitored and related questions such as:
  - Describe the operation of the monitoring equipment
  - Describe the interpretation of the results of the monitoring
  - Describe the length and interval of monitoring and when it will be discontinued

- Describe ability to recognize and respond to potential veterinary medical emergencies that could occur, including excessive bleeding, cessation of breathing, or other potential complications and related questions, such as:
  - When is medical intervention necessary
Veterinary Care Requirements for Licensees
Documentation of Veterinary Care NCIs

- What medical intervention will be used
- What equipment available for medical intervention and how is it operated
- When will the veterinarian be called

Documentation of Veterinary Care NCIs

Four Part Citation
If a citable noncompliance is identified, it should be documented in the inspection report narrative.

The noncompliance should be cited using the 4-part citation plus correction date, if appropriate:

1. A. Section number and subsection letter/number, if applicable, AND
2. B. Title and subtitle, if applicable, of the regulation or standard
3. Clear, detailed description of the noncompliance
4. Explanation of why the issue is a noncompliance
5. General description of how the licensee can meet the regulation/standard

Citing Section 2.40(b)(2) and/or 2.40(b)(3)

Section 2.40(b)(2)
Section 2.40(b)(2) is cited whenever a sick or injured animal:

- Has not been evaluated by the veterinarian either via a physical examination or consultation, OR
- Lacks a post-treatment re-evaluation if the vet care issue is not resolved

Correction of this NCI usually involves a consult or examination by a veterinarian, whichever is more appropriate.

Section 2.40(b)(3)
Section 2.40(b)(3) is cited when the facility has a problem where sick or injured animals are not receiving appropriate veterinary care due to:

- Inadequate or no daily observation to identify sick/injured animals, and/or
- Lack of timely communication with the veterinarian on issues of animal health

Correction of this NCI involves either adequate daily observation and/or timely communication with the veterinarian about issues of animal health.
In general, 2.40(b)(2) and (b)(3) should not both be cited. However, in some situations when both sections need to be cited to ensure the licensee/registrant understands that there are 2 distinct problems that need to be corrected/addressed, both may be cited.

**NOTICE**

It is not considered “piling on” citations to cite both Section 2.40(b)(2) and Section 2.4(b)(3) if both sections are applicable and the narrative clearly differentiates between the two Sections.

**Examples of Vet Care NCI Narratives**

Below are examples of narratives for veterinary care NCIs. When writing your narrative, you should adequately describe what you observe in your own words and style.

**2.40(b)(2)**

**Dogs**

*Matted Hair.* -A male, adult, buff colored shih tzu (microchip # 123456789) has a matted hair coat. Approximately 60% of the hair coat is matted, with the mats located mainly on the back, legs, feet and face. The mats vary in size from 2 to 6 inches in width and are pulling tight against the skin on the legs. Some of the mats under the tail contain fresh and dry feces and small yellow/tan debris. Matting can be painful and can lead to skin disease and other medical conditions. Correct by ensuring that all dogs have their hair coats routinely maintained in order to prevent, control, diagnose, and treat diseases associated with excessive matting.

**Wounds.** -An adult female black and white Border collie named “Horse” (microchip 8877814470) has multiple puncture wounds on the both of her front legs. The skin around the wounds was swollen and small amount of a yellowish thick discharge was present around some of the openings. The dog appeared to be painful as it was reluctant to bear weight on its right front leg when walking around the enclosure and appeared to be lethargic. The licensee was not aware that the dog had these injuries until the inspector asked about them, although she did state that the dog had gotten into a fight with a “yard dog” last week. Bite wounds are painful and can become infected without appropriate treatment. The licensee must have the dog examined by a veterinarian by 10:00 am tomorrow in order to obtain an appropriate diagnosis and treatment plan. The licensee must establish and maintain programs of adequate veterinary care, including the use of appropriate methods to prevent, diagnosis, and control diseases and injuries. Correct by ensuring that procedures are implemented for all injured or ill animals to promptly receive appropriate veterinary treatment.
Guinea Pigs

**General Illness.** Direct ** An adult female grey short haired guinea pig in pen XX was lethargic and lying on its stomach in an abnormal position in the pen. The guinea pig did not move when the licensee picked it up. On closer inspection, there was grayish mucus discharge around the outside of the left eye. The right eye appeared normal and fully opened. The guinea pig felt warm to the touch, was not responsive. Its ribs and backbone had very little fleshy coverage and were easily palpable. Once this animal was identified by inspectors, the licensee notified the veterinarian, but the animal died before the veterinarian arrived at the facility. The licensee must establish and maintain programs of adequate veterinary care, including the use of appropriate methods to prevent, diagnosis, and control diseases and injuries. Correct by ensuring that procedures are implemented for all clinically ill animals to promptly receive appropriate veterinary treatment.

Wild/Exotic Animals

**General Illness.** *** Direct *** An adult prairie dog was observed sitting hunched over with its head hanging down by the side of the enclosure. This prairie dog was thin, with a dull hair coat and patchy hair loss along its sides and back. The base of its tail was bare. The prairie dog did not move when approached by the other prairie dogs or when the keeper entered the enclosure to pick up the prairie dog. The keeper for this area stated that this is an older female animal that recently had three offspring all of which recently died. No treatment had been provided by the facility for this animal or any of the offspring and no veterinarian had been contacted prior to inspection. Once APHIS Officials identified this animal to the facility, the prairie dog was taken to the attending veterinarian where it was hospitalized for diagnosis and treatment. Failure to promptly provide veterinary treatment to animals in need of care may prolong the suffering of unhealthy animals. In the case of contagious disease this also may result in the spread of disease to previously unaffected animals. The licensee must provide appropriate methods to prevent, control, diagnose, and treat diseases and injuries. Correct by ensuring that procedures are implemented for all clinically ill animals to promptly receive appropriate veterinary treatment.

2.40(b)(3)

Farm-type animals & exotic hoof stock

*Vet care issues not observed [Also cited under 2.40(b)(2)].*** 9 animals were found in need of veterinary care during this inspection including a Suffolk type sheep with hair loss and wounds on the shoulder and flank, a coughing Bohr goat, 2 Bohr goats with swollen masses on their necks, a limping Suffolk sheep, a Suffolk ewe with a nasal discharge, a black and white male sheep with an abrasion and hair loss on the poll of its head, a limping Tahr goat, a Blackbuck antelope and Aoudad both with long feet. All of these animals were
identified by USDA inspectors during this routine inspection. The facility provided no documentation of care or knowledge of any animal problems. Daily observation continues to be a problem at this facility. Correct by ensuring that all animals are adequately observed on a daily basis and ensuring that all animals exhibiting signs of ill-health are conveyed to the attending veterinarian.

**Lack of weekend care.** Direct Several dead hamsters and gerbils were observed in multiple enclosures also housing live adult animals. These deceased animals exhibited a marked amount of cannibalism. Based on the state of these remains, the dead animals had been present in the enclosures for a significant period of time and should have been observed and removed prior to inspection. The facility representative and licensee both stated that no employees are present on the facility on the weekends; therefore, no daily observations are being performed at least two days per week. This inspection took place following a holiday weekend and therefore, no staff had been present to observe animals for three days prior. Daily observation continues to either not be performed or not be performed adequately. A failure to conduct adequate observations can result in a delay of care provided to the animals and prolonged animal suffering. All animals must be observed daily to assess their health and well-being. Problems of animal health, behavior, and well-being shall be communicated to the attending veterinarian and addressed in a timely manner. Correct by ensuring that all animals are adequately observed on a daily basis and ensuring that all animals exhibiting signs of ill-health are conveyed to the attending veterinarian.
Chapter 7

Research Facility Inspection–IACUC Requirements and Protocols

Contents

IACUC Review Information for the Inspector 7-3
General Information 7-3
  Membership 7-3
  Meetings 7-4
  Minutes 7-4
Program of Humane Care and Use Review 7-5
Facility Inspection 7-6
Reports to the Institutional Official 7-7
Protocol Activity Suspension 7-8
Complaints or Concerns 7-9
Records 7-9
Telecommunications for IACUC Meetings 7-9
Information to Review 7-10
IACUC Review Information for the Registered Research Facility 7-11
Appointment of the IACUC 7-11
  Criteria 7-11
  Membership 7-11
    Members 7-11
    Chairperson 7-12
      Doctor of Veterinary Medicine 7-13
      Nonaffiliated Member 7-13
      Alternate Members 7-14
Program Review 7-14
  Method 7-14
  Criteria 7-15
Facility Inspection 7-17
  Facilities 7-17
  Method 7-18
  Criteria 7-19
IACUC Protocol Review 7-19
  Criteria 7-19
    General Protocol Requirements 7-19
    Painful/Distressful Procedures 7-21
    Surgical Procedures 7-22
Exceptions/Exemptions 7-25
Significant Changes to Animal Activities 7-27
Protocol Review Information for the Inspector 7-28
Inspection Protocol Review Guidance 7-28
  Sampling Guidance 7-28
  Verification of IACUC Activities 7-30
  Protocol Approval Process 7-31
  Specific Types of Protocols 7-31
  Inspection Procedures 7-36
Protocol Review Information for the Registered Research Facility 7-39
Procedure for Protocol Review 7-39
  Procedure 7-39
  Consultants 7-40
  Notification 7-41
  Continuing Review 7-41
  Changes in Protocols 7-41
Suspension of a Protocol Activity 7-41
  Criteria 7-42
Contracted Research or Projects that Involve Multiple Registrants 7-42
  No Documentation of Responsibilities 7-42
  Specific Responsibilities 7-42
  All Responsibilities Designated 7-43
Records 7-44
  Required Research Facility Records 7-44
  Animal Records 7-45
  Annual Report 7-46
  Retention 7-48
  Availability 7-49
  Confidentiality and Removal of Records 7-49
Electronic Communication 7-50
  IACUC Meetings 7-50
Guidance for Veterinary Schools and Veterinary Technician Programs (VTP)
  for the Inspector 7-51
  Teaching Versus Research 7-51
  Registration Requirements 7-51
  Licensing Requirements for Providing Animals to VTP 7-53
  Inspection Procedures 7-53
  Special Considerations 7-55
Holding Period Regulations Summary Chart 7-56
Research Facility Protocol Selection Worksheet 7-57
NOTICE

The AWA specifically prohibits Animal Care from stopping research at any research facility (registered or unregistered but requiring registration). Therefore, you (the inspector) may NOT instruct a research facility to stop conducting research under any circumstances.

IACUC Review Information for the Inspector

General Information
All IACUC responsibilities, functions, and activities **must** be completely and thoroughly reviewed.

Membership
In assessing IACUC membership, you should look for verification that:

◆ All required positions are filled.

**NOTICE**

If a required position(s) is unfilled, there is **not** a properly constituted IACUC. An improperly constituted IACUC cannot perform the required official AWA functions.

◆ The DVM has acceptable experience and responsibility for animal care and delegated authority for activities.

◆ The nonaffiliated member represents the general public, i.e., has **no** conflict of interest either personally or financially, and is **not** a laboratory animal user at any research facility.

◆ There are **no** more than three members from one administrative unit of the research facility, unless the facility is so small that it only has one administrative unit.

◆ IACUC members are qualified to assess the research facility’s animal program, facilities, and procedures.

◆ IACUC members are properly trained and instructed in areas such as:
  - The Animal Welfare Act
  - Protocol review
  - Program review
  - Facility inspection

**NOTICE**

While **not** prohibited by the AWA, the inspector should strongly discourage the same person from filling multiple required positions. (Policy 15)
Meetings
In assessing meetings, you should look for verification that:

◆ All members are informed of all meetings.
◆ Meetings are held at a time when all members, especially the nonaffiliated member, can attend.
◆ Required members (committee chair, nonaffiliated member, and attending veterinarian) are in attendance at most meetings. (There is no requirement that all required members must be in attendance at all meetings.)

**NOTICE**
If any required member is absent from a substantial number of meetings, the research facility may need to find a different person to fill the position.

◆ All members have access to information distributed, e.g., if sent only over email, all members must have email.
◆ All members are sent information for an IACUC meeting in sufficient time prior to the meeting to be able to review the information.
◆ All members receive a list of protocols, or the actual protocols to be reviewed, in sufficient time to participate in the review or request a full committee review.
◆ There is a mechanism for a member to request a full IACUC review of a protocol or participation in the appointed subcommittee review.
◆ If a member requests a full IACUC review of a protocol, a full IACUC review is conducted.

Minutes
The IACUC meeting minutes should include:

◆ A list of members who attended and/or who did not attend
◆ All the activities conducted by the IACUC at the meeting
◆ Any dissenting opinions
◆ Approval of the minutes (usually of the previous meeting) by the IACUC (recommended, but not required)
◆ Substance of the deliberations of the IACUC, not just the decisions reached

**NOTICE**
For requirements for conducting meetings using telecommunications, see Telecommunications for IACUC Meetings and Electronic Communication.
Program of Humane Care and Use Review

In assessing the program review, you should look for verification that:

◆ The review is being conducted at least once every 6 months.

**NOTICE**

The USDA is in agreement with OLAW that the timing of the Facility Inspection can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

◆ If the IACUC adopted the AAALAC International Program Assessment report as its semiannual program review, the following requirements were met:
  ❖ The report complied with Section 2.31(c)(1) and (3).
  ❖ At least two members of the IACUC assisted in conducting the inspection.
  ❖ **No** IACUC member wishing to participate in any evaluation was excluded.
  ❖ The report was signed by a majority of the IACUC members (individual digital signatures are acceptable).
  ❖ The report:
    ✚ included any minority views
    ✚ distinguished minor from significant deficiencies
    ✚ contained a reasonable and specific plan and schedule with dates for each deficiency
    ✚ was submitted to the Institutional Official (IO) in a timely manner

◆ All members are informed of the program review to be conducted by the appointed subcommittee in sufficient time to request participation.

◆ Any member who wants to participate in the program review is allowed to do so.

◆ The program of humane care and use addresses all of the required areas.

◆ Any identified departure from the AWA regulations and standards includes a description of and reason for the departure.

◆ If a departure occurred due to a program deficiency, then there is a:
Classification of the deficiency as a significant deficiency or a minor deficiency

NOTICE
A significant deficiency is one which is, or may be, a threat to the health or safety of the animal.

Description of a reasonable and specific plan for correcting the deficiency

Schedule with dates for correcting the deficiency

A report of the IACUC program review:
  - Is completed
  - Is signed by a majority of the members (individual digital signatures are acceptable)
  - Contains any minority views
  - Is submitted to the Institutional Official (IO) in a timely manner

Any uncorrected significant deficiency was properly reported to Animal Care and other appropriate Federal agencies.

Facility Inspection
In assessing the facility inspection, you should look for verification that:

- The facility inspection is being conducted at least once every 6 months.

NOTICE
The USDA is in agreement with OLAW that the timing of the Facility Inspection can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

- If the IACUC adopted the AAALAC International Program Assessment report as its semi-annual facility inspection, the following requirements were met:
  - The report complied with Section 2.31(c)(2) and (3).
  - At least two members of the IACUC assisted in conducting the inspection.
  - No IACUC member wishing to participate in any evaluation was excluded.
  - The report was signed by a majority of the IACUC members.
- The report:
  - included any minority views
  - distinguished minor from significant deficiencies
- contained a reasonable and specific plan and schedule with dates for each deficiency
- was submitted to the IO in a timely manner

- All members are informed of the date and time of the facility inspection.
- All members are informed of the facility inspection to be conducted by the appointed committee in sufficient time to request participation.
- Any member who wants to participate in the facility inspection is allowed to do so.
- All of the animal holding, housing, and use areas are inspected.
- Any identified departure from the AWA regulations and standards includes a description and reason for the departure.
- If a departure occurred due to a program deficiency, then there is a:
  - Classification of the deficiency as a significant deficiency or a minor deficiency

**NOTICE**

A significant deficiency is one which is, or may be, a threat to the health or safety of the animal.

- Description of a reasonable and specific plan for correcting the deficiency
- Schedule with dates for correcting the deficiency

- A report of the IACUC facility inspection:
  - Is completed
  - Is signed by a majority of the members (individual digital signatures are acceptable)
  - Contains minority views
  - Is submitted to the IO in a timely manner

- Any uncorrected significant deficiency was properly reported to Animal Care and other appropriate Federal agencies.

**Reports to the Institutional Official**

In assessing the reports to the IO, you should look for verification that:

- A report(s) is submitted at least every 6 months, after each program review and facility inspection.
- There is a description of how and to what extent the research facility meets the AWA regulations and standards, such as:
  - Facility is in total compliance and description, or
  - Describes each item **not** in compliance (deficiency)
◆ Any identified departure from the AWA regulations and standards includes a description and reason for the departure.
◆ If a departure occurred due to a program deficiency, then there is a:
  ❖ Classification of the deficiency as a significant deficiency or a minor deficiency

**NOTICE**
A significant deficiency is one which is, or may be, a threat to the health or safety of the animal.

❖ Description of a reasonable and specific plan for correcting the deficiency
❖ Schedule with dates for correcting the deficiency
◆ Recommendations to the IO regarding any aspect of the facility’s animal program, facilities, and personnel training are included in the report.
  ❖ The report is signed by a majority of the members (individual digital signatures are acceptable).
◆ The report contains any minority views.

Other reports to the IO which should be requested and reviewed include, but are not limited to:
◆ Notice of suspension of a protocol
◆ Uncorrected significant deficiencies
You should review how the reports are sent to the IO.

**NOTICE**
If you have a concern that the Institutional Official is not receiving the required reports/information or acting on the required reports/information, you should visit with the IO.

**Protocol Activity Suspension**
In assessing the IACUC’s suspension of protocol activities, you should look for verification that:
◆ The activity was reviewed and suspended at a convened meeting with a quorum of the IACUC present.

**NOTICE**
A quorum means a majority of the Committee members.
◆ The suspension was approved by majority vote of the quorum present.
◆ The IO, in conjunction with the IACUC:
  ❖ Reviewed the reason for the suspension
Took appropriate corrective action
Instituted adequate follow-up measures and monitoring of the suspended activity
Informed the appropriate Animal Care Regional Office of the suspension
Informed other appropriate Federal funding agencies of the suspension

Complaints or Concerns
In assessing the IACUC’s responsibility for addressing complaints or concerns, you should look for verification that:

- Adequate methods are in place for receiving complaints or concerns from sources outside the research facility.
- Adequate, confidential methods are in place for receiving complaints or concerns from sources inside the facility.
- Complaints or concerns were reviewed and, if appropriate, investigated for validity.

Records
In addition to the reports listed above, the following IACUC records must be available for review and in compliance with the AWA regulations:

- Protocols
- Proposed significant changes to protocols
- IACUC approval or non-approval of protocols or proposed significant changes to protocols
- Any other protocol-related information

Telecommunications for IACUC Meetings
Methods of telecommunications (e.g., telephone or video conferencing) are acceptable for the conduct of official IACUC business requiring a quorum, provided the following criteria are met:

- All members are given notice of the meeting.
- Documents normally provided to members during a physically-convened meeting are provided to all members in advance of the meeting.
- All members have access to the documents and the technology necessary to fully participate.
- A quorum of Committee members is convened when required.
The forum allows for real time verbal interaction equivalent to that occurring in a physically-convened meeting (i.e., members can actively and equally participate and there is simultaneous communication).

If a vote is called for, the vote occurs during the meeting and is taken in a manner that ensures an accurate count of the vote. A mail ballot or individual telephone polling cannot substitute for a convened meeting.

Opinions of absent members that are transmitted by mail, telephone, fax, or email may be considered by the convening IACUC members, but may not be counted as votes or considered as part of the quorum.

Written minutes of the meeting are maintained as required.

**Information to Review**

The information below represents supplemental information and materials that the facility can provide which can help verify or assess IACUC function. Documents that can be reviewed to assess IACUC function may include, but are not limited to:

- Audio tapes provided by the research facility
- Cage wash water temperature certification records
- Emails and email records
- IACUC facility inspection reports
- IACUC-related correspondence
- Interviews with IACUC members
- Maintenance records
- Medical/surgical records
- Memos and notes
- Program of humane care and use
- Room temperature logs
- Standard operating procedures
- Written meeting minutes
IACUC Review Information for the Registered Research Facility

Appointment of the IACUC
The Chief Executive Officer of the research facility or the Institutional Official (IO) if designated by the CEO must appoint an Institutional Animal Care and Use Committee (IACUC). [2.31]

Criteria
The IACUC must be qualified through the experience and expertise of its members to assess the research facility’s: [2.31(a)]

- Animal program
- Facilities
- Procedures

Except as specifically authorized by law or the Animal Welfare Act regulations, the Animal Welfare Act and its regulations do not authorize a research facility’s IACUC to dictate to a researcher how to conduct his/her research by: [2.31(a)]

- Prescribing methods for the design or performance of research or experimentation
- Setting standards for the design or performance of research or experimentation

Membership
The Institutional Animal Care and Use Committee (IACUC) must be composed of a Chairperson and at least two additional members. [2.31, Policy #15]

Members
The IACUC must be composed of: [2.31(b)(2) and (3)]

- A Chairperson
- At least one Doctor of Veterinary Medicine (DVM)
- At least one nonaffiliated member

NOTICE
To be a properly constituted IACUC, all three positions must be filled.

IACUC members must be qualified to assess the research facility’s animal program, facilities, and procedures. The research facility is responsible for: [Policy #15]
ENSURING THE QUALIFICATIONS OF THE MEMBERS

Providing training and instruction to the members in areas such as:

- The Animal Welfare Act
- Facility inspection
- Program review
- Protocol review

Although **not** specifically prohibited by the AWA, APHIS strongly discourages one person from filling more than one of those positions, such as: [Policy #15]

- The DVM being the Chairperson
- The nonaffiliated member being the Chairperson

**NOTICE**

APHIS also strongly discourages the research facility’s Institutional Officer from being the Chairperson or DVM.

If the IACUC consists of more than three members, **not** more than three members can be from the same administrative unit of the research facility, such as: [2.31(b)(4)]

- Biology Department
- Cardiology Department

**Chairperson**

The Chairperson is generally responsible for the activities of the IACUC, but the responsibility for managing the IACUC may be delegated or reside in an administrative unit.

IACUC activities may include, but are **not** limited to:

- Certifying the research facility’s compliance with the AWA and its regulations and standards
- Informing the Principal Investigator of the IACUC’s decisions regarding his/her protocol
- Assuring that records of activities are kept
- Leading the meetings
- Sending a list of protocols to be reviewed to members
- Sending the required reports to the Institutional Official
- Setting the agenda for meetings
- Scheduling meetings
**Doctor of Veterinary Medicine**
The Doctor of Veterinary Medicine **must** have: [2.31(b)(3)(i)]

- Ability to critically review a protocol for veterinary care issues, and
- Direct or delegated authority for activities involving animals at the research facility, and
- Training or experience in laboratory animal science and medicine

**NOTICE**
A research facility's Attending Veterinarian may fulfill the role of the DVM on the IACUC, or the position may be filled by another veterinarian.

**Nonaffiliated Member**
The nonaffiliated or outside member represents the interests of the general public and must **not** be: [2.31(b)(3)(ii), Policy #15]

- A laboratory animal user at any research facility
- A member of the immediate family of a person who is affiliated with the research facility
- A person with financial interest in the facility, such as an animal supplier
- Compensated to an amount which jeopardizes the member’s status as a nonaffiliated member

Compensation for the nonaffiliated member may include: [Policy #15]

- Meals
- Modest monetary payment which does **not**:
  - Become an important source of income
  - Influence voting on the IACUC
- Parking
- Travel expenses

Examples of nonaffiliated members include, but are **not** limited to:

- Bioethicists
- Biologists
- Clergy
- Humane society volunteers or employees
- Non-research staff members from other institutions
- Physicians
◆ Practicing veterinarians
◆ Retirees

Alternate Members
There may be alternate members appointed to the IACUC by the IO.

Alternates may only serve as an alternate in the membership category(s) for which they are qualified. For example, the alternate for a non-affiliated IACUC member would need to also meet the non-affiliated member requirements.

If the regular member fulfills a specific membership requirement, his or her alternate must also fulfill that requirement. If the regular member fulfills more than one membership requirement, the alternate must meet the same membership requirements.

One alternate may be appointed to serve for multiple regular members provided the alternate fulfills the specific membership requirement of the members for whom he or she is substituting. However, an alternate may not represent more than one member at any one time.

Program Review
The IACUC must review and evaluate the research facility’s program for humane care and use of animals at least once every 6 months. [2.31]

NOTICE
The USDA is in agreement with OLAW that the timing of the Program Review can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

Method
The IACUC is responsible for determining the best method for conducting the review of the humane care and use program. [2.31(c)(3)]

The IACUC may: [2.31(c)(3)]
◆ Conduct the review with all IACUC members participating, or
◆ Appoint a subcommittee of at least two members to conduct the review.

NOTICE
No IACUC member wishing to participate in the review may be excluded.
◆ Invite an ad hoc consultant(s) to assist with the program review.
The IACUC may adopt the AAALAC International Program Assessment report as its semi-annual program review if:

- The report complies with Section 2.31(c)(1) and (3).
- The report is made available to the APHIS inspector upon request.
- At least two members of the IACUC assisted in conducting the inspection.
- No IACUC member wishing to participate in any evaluation was excluded.
- The report was signed by a majority of IACUC members (individual digital signatures are acceptable).
- The report:
  - included any minority views
  - distinguished minor from significant deficiencies
  - contained a reasonable and specific plan and schedule with dates for each deficiency
  - was submitted to the IO in a timely manner

Criteria

The review of the program of humane care and use must be based on the AWA regulations and standards (Title 9, Chapter I, Subchapter A–Animal Welfare). [2.31(c)(1)]

Additional resources which may be used include, but are not limited to:

- Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, published by the Federation of Animal Science Societies (most current edition)
- Guide for the Care and Use of Laboratory Animals, published by the Institute of Laboratory Animal Resources (most current edition)

Areas which should be addressed in the program of humane care and use include, but are not limited to:

- Animal care, such as:
  - Cleaning/sanitation
  - Environment
  - Environmental enrichment for nonhuman primates
  - Exercise for dogs
  - Food/water
  - Housing
◆ IACUC-approved exceptions, such as:
  ❖ Exceptions to the cleaning or sanitation requirements
  ❖ Exceptions to the diurnal lighting cycle requirement
  ❖ Exceptions to the space requirement (including innovative enclosures and metabolism cages)
  ❖ Maintaining animals at temperatures outside the ranges specified by the standards
  ❖ Use of an animal in more than one major survival surgery (see Policy #14)

◆ IACUC functions, such as:
  ❖ Attendance at meetings, especially nonaffiliated member
  ❖ Complaint review
  ❖ Dissemination of protocols to members
  ❖ IACUC meeting minutes
  ❖ IACUC records
  ❖ Protocol review
  ❖ Recommendations to the IO
  ❖ Reports to the IO
  ❖ Required meetings
  ❖ Review of humane care and use program
  ❖ Review of standard operating procedures (SOPs)

Notices

There is no requirement for every SOP to be reviewed every 6 months. The IACUC may determine a reasonable schedule for review of SOPs.

◆ Suspended activities
◆ Identification
◆ Personnel qualifications and training.
◆ Records
◆ Veterinary care, such as:
  ❖ Anesthesia and surgery
  ❖ Emergency, weekend, and holiday care
  ❖ Euthanasia
  ❖ Pain/distress management (see Policy #11)
  ❖ Pre/post-procedural care
The findings of the program review must be included in a report to the IO. [2.31(c)(3)]

**Facility Inspection**
The IACUC must inspect the research facility’s animal facilities at least once every 6 months. [2.31]

**NOTICE**
The USDA is in agreement with OLAW that the timing of the Facility Inspection can include flexibility of within 30 days of the 6 month interval from the last Review, as long as there is not forward drift of the date from year to year. To avoid forward drift, the IACUC should consider scheduling Program Reviews during the same calendar month from year to year.

**Facilities**
Animal facilities which must be inspected include, but are not limited to:

- All sites (including remote sites) where animals are housed for more than 12 hours or used (including laboratories)
- Cage cleaning areas
- Drug storage areas, including investigators’ labs and offices, if appropriate
- Food and bedding storage areas
- Holding areas
- Loading docks and transport equipment, such as:
  - Transport cages
  - Vehicles
- Study areas where animals are confined for more than 12 hours
- Surgical suites and prep areas

**NOTICE**
It is strongly recommended that the IACUC inspect areas where animals are housed for less than 12 hours.

In addition to inspecting the facilities, the IACUC should conduct:

- A review of management practices
- A review of the mechanism for animal users and caretakers to report animal health problems or concerns
- An assessment of animal users and caretakers ability to recognize problems of animal health and behavior
◆ An assessment of the care of the animals
◆ An assessment of the condition of the animals

Animal facilities which do not have to be inspected are:
◆ Areas containing free-living wild animals in their natural habitat

**NOTICE**
Field study areas are **not** required to be inspected. [2.31(c)(2)]

◆ Areas used exclusively for non-regulated animals
◆ Housing areas at another research facility if the IACUC has delegated responsibility for the animals housed in those areas to the IACUC of the other facility

**NOTICE**
The IACUC should document that it has delegated the facility inspection responsibility to the IACUC of the other research facility.

◆ Sites which are **not** in the United States or U.S. territories (foreign sites)

**Method**
The IACUC is responsible for determining the best method for conducting the facility inspection. [2.31(c)(3)]

The IACUC may:
◆ Appoint a subcommittee of at least two members to conduct the inspection, or

**NOTICE**
**No** IACUC member wishing to participate in the inspection may be excluded.

◆ Have all of the Committee members participate in the inspection, or
◆ Invite an ad hoc consultant(s) to assist with the facility inspection

The IACUC may adopt the AAALAC International Program Assessment report as its semi-annual program review if:
◆ The report complies with Section 2.31(c)(2) and (3).
◆ The report is made available to the APHIS inspector upon request.
◆ At least two members of the IACUC assisted in conducting the inspection,
◆ **No** IACUC member wishing to participate in any evaluation was excluded.
◆ The report was signed by a majority of IACUC members (individual digital signatures are acceptable).
◆ The report:
  ❖ included any minority views
  ❖ distinguished minor from significant deficiencies
  ❖ contained a reasonable and specific plan and schedule with dates for each deficiency
  ❖ was submitted to the IO in a timely manner

Criteria
The inspection must be based on the AWA regulations and standards (Title 9, Chapter I, subchapter A–Animal Welfare). [2.31(c)(2)]

Additional resources which may be used include, but are not limited to:
◆ Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching, published by the Federation of Animal Science Societies (most current edition)
◆ Guide for the Care and Use of Laboratory Animals, published by the Institute of Laboratory Animal Resources (ILAR) (most current edition)

The findings of the facility inspection must be included in a report to the IO. [2.31(c)(3)]

IACUC Protocol Review
The IACUC must review all protocols and significant changes to approved protocols. [2.31, Policy #11, Policy #12, and Policy #14]

Criteria
In order to approve a protocol or significant change to an approved protocol, the IACUC must:

◆ Review those components of the activities related to the care and use of animals, and
◆ Determine that the proposed activities meet and comply with the AWA regulations and standards, unless an acceptable justification for a departure is presented in writing.

General Protocol Requirements
A protocol to conduct an activity involving animals must contain and comply with the requirements/assurances detailed below.

Protocols must meet the following requirements:
◆ Provide the rationale for using animals [2.31(e)(2)]
◆ Identify the species of animals to be used [2.31(e)(1)]
◆ Provide a rationale for the appropriateness of the species [2.31(e)(2)]
◆ Provide the approximate number of animals to be used [2.31(e)(1)]
◆ Provide a rationale for the number of animals to be used, such as but not limited to: [2.31(e)(2)]
  ● Required for statistically significant results (tests used or statisticians consulted should be included)
  ● Based on scientific literature or past experience (references should be cited)
  ● Based on results of pilot study
  ● Required by the Food and Drug Administration (FDA) or other Federal agency (Federal code, regulation, or standard, etc., must be cited)
  ● Required by international testing requirements (code, regulation, standards, etc., must be cited)
  ● Number of students/animal and procedures needed to learn
◆ Describe the proposed use of the animals, including final disposition of the animal [2.31(e)(3)]

**NOTICE**
The description should be clear enough to be easily understood by the IACUC’s outside member.

◆ Contain a written assurance from the principal investigator that the proposed activities do **not** unnecessarily duplicate previous experiments [2.31(d)(1)(iii), see ]
◆ Medical care will be provided when necessary
◆ The animal’s living conditions, housing, feeding, and nonmedical care will be: [2.31(d)(1)(vi)]
  ● Appropriate
  ● In accordance with AWA standards
  ● Directed by the attending veterinarian or other qualified scientist
◆ All personnel who will be conducting the proposed activities on the animals are qualified and trained [2.31(d)(1)(viii)]
◆ Pain/distress/discomfort are minimized [2.31(d)(1)(i) and 2.31(e)(4)]
◆ Contain a complete description of procedures designed to assure the pain/distress/discomfort are minimized [2.31(e)(4)]
◆ Describe the method(s) of euthanasia to be used [2.31(e)(5)]
Painful/Distressful Procedures
Procedures that may cause more than momentary or slight pain or distress to the animal must contain and comply with assurances that the pain/distress is necessary and will be relieved or minimized.

Some procedures that can be expected to or may cause more than momentary pain or distress include, but are not limited to: (see Policy #11)

- Extensive irradiation, inhalation toxicity, or tumor growth studies
- Food or water deprivation or restriction beyond that necessary for normal pre-surgical preparation
- Forced exercise
- Noxious electrical shock or thermal stress that is not immediately escapable
- Ocular or skin irritancy testing
- Paralysis or immobility in a conscious animal
- Surgery (survival or terminal)
- Use of Freund’s Complete Adjuvant

Protocols with procedures that may cause pain or distress must meet the following requirements:

- The principal investigator(s) (PI) has considered alternatives to the painful/distressful procedure [2.31(d)(1)(ii)]. The PI should consider:
  - Refinement alternatives that may further minimize or avoid pain and/or distress
  - Reduction alternatives that may reduce the number of animals required to attain study objectives
  - Replacement alternatives that may allow some or all of the scientific objectives to be attained without the use of live animals, or with the use of phylogenetically lower species

- If the consideration of alternatives is done by an electronic database search, then a written narrative describing the methods and sources used to determine that alternatives were not available should include, but is not limited to: [2.31(d)(1)(ii), see Policy #12]
  - Date of the search
  - Database(s) searched
  - Years covered by the search
  - Search strategy(ies) used
Research Facility Inspection–IACUC Requirements and Protocols  
IACUC Review Information for the Registered Research Facility

- If the consideration of alternatives is done by other means, then a written narrative describing the methods and sources used to determine that alternatives were not available should include, but is not limited to: [2.31(d)(1)(ii), see Policy #12]
  - Years covered by the consideration
  - Consideration strategy(ies) used
  - Sources consulted, including, if applicable:
    - Reliable unpublished research data
    - Expert consultation (list credentials)

- Painful/distressful procedures will be performed with appropriate: [2.31(d)(1)(iv)(A)]
  - Sedatives
  - Analgesics
  - Anesthetics

- If painful/distressful procedures will be performed without the appropriate sedative, analgesics, or anesthetics, then withholding such agents must:
  - Be in writing, and
  - Detail the justification for scientific reasons for withholding these agents, and
  - State the period of time (if known) that these agents will be withheld, or
  - Have an assurance statement that these agents will be withheld for the shortest period of time necessary

- The research facility’s attending veterinarian or his/her designee was consulted and involved in the planning of the procedure and pain/distress relief [2.31(d)(1)(iv)(B)]

- Procedures will not include the use of paralytics without anesthesia [2.31(d)(1)(iv)(C)]

- Animals experiencing severe or chronic pain/distress that cannot be relieved will be humanely euthanized [2.31(d)(1)(v)] See Table 7-1 on page 7-38.

Surgical Procedures

Pre- and Post-Surgical Care
Protocols that involve surgery must detail the provisions for pre- and post-operative care of the animals in accordance with accepted veterinary and nursing practices, such as: [2.31(d)(1)(ix)]
◆ Adequate monitoring of recovery
◆ Adequate post-procedural observation and monitoring
◆ Placing animal in appropriate recovery or post-recovery environment

For pain/distress-relieving drugs, the protocol should clearly specify or there should be IACUC-approved policies (e.g., guidance documents, standard operating procedures, drug formularies) for the provision of medication to minimize discomfort or pain, including but not limited to: [2.31(e)(4)]

◆ Anticipated signs of pain and distress
◆ Dosages and routes of administration
◆ Drugs to be used
◆ Frequency of administration
◆ Person(s) who is responsible for determining when pain-relieving drugs are needed, if appropriate
◆ When drugs should be administered
◆ When drugs should not be administered, if required for scientific reasons

**NOTICE**
A pro re nata (PRN or "as needed") frequency of administration is not acceptable unless there are detailed instructions and criteria for determining administration of the drug.

**Survival Surgery [2.31(d)(1)(ix)]**
All survival surgery must be performed using aseptic procedures including, but not limited to:

◆ Aseptic technique
◆ Masks
◆ Sterile instruments
◆ Sterile surgical gloves

**NOTICE**
Surgery is survival if the animal regains consciousness during or after the operative procedure.

**Non-Survival Surgery**
Non-survival surgery:

◆ Does not require a dedicated surgical facility
◆ Must be performed in accordance with established veterinary medical and nursing practices
Major Operative Procedure [2.31(d)(1)(ix)]
Major operative procedures on regulated non-rodent animals must be performed in a dedicated surgical facility which must be operated and maintained under aseptic procedures.

A major operative procedure means any surgical intervention that penetrates and exposes a body cavity or any procedure which produces permanent impairment of physical or physiological functions.

The IACUC has the authority to determine whether specific manipulations used in research are major operative procedures. The IACUC’s determination must be based:

- on a detailed description of the procedure, and
- the anticipated or actual consequences, as characterized by the investigator.

In some cases, the classification by the IACUC of a procedure as major or minor may be readjusted post-procedurally depending on clinical outcome. If the IACUC, after thorough review, determines that the surgical procedure only penetrates but does not expose a body cavity and that the procedure does not produce substantial impairment, the IACUC may conclude that it is not a major operative procedure.

Some major operative procedures include, but are not limited to:

- Amputation
- Craniotomy
- Joint replacement
- Laparotomy

NOTICE
Any laparoscopic surgery that produces substantial impairment of physical or physiological function must be considered a major operative procedure. Whether the laparoscopic procedure is classified as major or minor, the IACUC must ensure that the appropriate analgesia, sterile technique, and perioperative monitoring is employed.

- Thoracotomy
- Thyroidectomy

Non-major Operative Procedure [2.31(d)(1)(ix)]
Non-major operative procedures on regulated animals:

- Do not require a dedicated surgical facility
Must be performed using aseptic procedures

Some minor operative procedures include, but are not limited to:

 Peripheral vessel cannulation
 Tooth extraction
 Wound suturing

Rodent Surgery [2.31(d)(1)(ix)]
Surgery on rodents:

 Does not require a dedicated surgical facility
 Must be performed using aseptic procedures

Field Site Surgery [2.31(d)(1)(ix)]
Surgeries conducted at field sites:

 Do not require a dedicated surgical facility
 Must be performed using aseptic procedures

Multiple Survival Surgeries [2.31(d)(1)(x), see Policy #14]
An animal may not be used in more than one major operative survival procedure in one protocol unless the multiple procedures are:

 Justified, in writing, for scientific reasons, and
 Approved by the IACUC

An animal may not be used in two separate protocols with major operative survival procedures unless an exemption is approved by the APHIS Administrator.

The request for approval of the exemption by the APHIS Administrator should follow the guidance in Policy 14.

NOTICE
An animal that has a veterinary procedure, such as spaying, neutering, or descenting, or an emergency major operative procedure for health reasons, may be used in a protocol that requires a major survival surgery.

Exceptions/Exemptions
Exceptions or exemptions to a particular AWA Regulation or Standard approved by the IACUC must be:

 For scientific reasons
◆ Justified in writing

If a regulation or standard also provides specific parameters for an exemption/exception, those parameters must be followed.

Exceptions that should be reported on the Annual Report:

◆ Exceptions approved by the IACUC under 2.38(k) that are not provided for under the Regulations and Standards, including but not limited to:
  ❖ Removal of resting platforms from cat enclosures
  ❖ Extension of interval for cleaning/sanitization of enclosures
  ❖ Keeping animals in 24 hour dark cycle
  ❖ Keeping animals in temperatures outside range described in Part 3—Standards for species

◆ Exceptions approved by Animal Care, including but not limited to:
  ❖ Approval for use of an animal in more than one major operative procedure from which it is allowed to recover on more than one protocol (2.31)(d)(1)
  ❖ Exception to the health certificate requirement (2.38)(h)
  ❖ Temporary tethering of dogs used as the primary enclosure (3.6)(c)(4)

Exceptions that should not be reported on the Annual Report:

◆ Exceptions approved by the IACUC that are provided for under the Regulations and Standards, including but not limited to:
  ❖ Approval for use of an animal in more than one major operative procedure from which it is allowed to recover on one protocol (2.31)(d)(1)
  ❖ Short term withholding of food and water from animals (2.38)(f)(2)
  ❖ Exemption of an individual NHP from some or all of the environmental enhancement plan (3.81)(e)(2)
  ❖ Any deviation from the methods of euthanasia as defined in the AWA regulations which were justified for scientific reasons, in writing, by the investigator (2.31)(d)(1)(xi)
  ❖ Withholding of water from a NHP if required by the research protocol approved by the IACUC (3.83)

◆ Exceptions approved by a veterinarian as part of the provision of veterinary care, including but not limited to:
  ❖ Animal is fasted for surgery conducted for husbandry reasons
• Animal is housed in an enclosure that does not meet space requirements for medical reasons while recovering from husbandry or veterinary care related surgery
• Animal develops vomiting/diarrhea (not study related) and veterinarian prescribes IV fluids and severely restricts food and water intake by mouth for several days

Significant Changes to Animal Activities
In support of the use of performance standards and professional judgment and to reduce regulatory burden, IACUC-reviewed and -approved policies (e.g., guidance documents, standard operating procedures, drug formularies) for the conduct of animal activities may be used for the administrative handling of some significant changes as outlined below.

The following significant changes must be approved by either full Committee review or designated member review:
◆ from nonsurvival to survival surgery
◆ resulting in greater pain, distress, or degree of invasiveness
◆ in housing and or use of animals in a location that is not part of the animal program overseen by the IACUC
◆ in species
◆ in study objectives
◆ in Principal Investigator (PI)

The following significant changes may be handled administratively according to IACUC-reviewed and -approved policies in consultation with a veterinarian authorized by the IACUC:
◆ anesthesia, analgesia, sedation, or experimental substances
◆ euthanasia to any method approved in the AVMA Guidelines for the Euthanasia of Animals
◆ duration, frequency, type, or number of procedures performed on an animal

The following significant change that may be handled administratively according to an existing IACUC-reviewed and -approved policy without additional consultation or notification is:
◆ an increase in previously approved animal numbers

The following changes may be handled administratively without IACUC-approved policies, consultations, or notifications:
Research Facility Inspection–IACUC Requirements and Protocols
Protocol Review Information for the Inspector

- correction of typographical errors
- correction of grammar
- contact information updates
- change in personnel, other than the PI. (There must be an administrative review to ensure that all such personnel are appropriately identified, adequately trained and qualified, enrolled in occupational health and safety programs, and meet other criteria as required by the IACUC.)
- Investigators may use fewer animals than approved. This does not require IACUC approval, notification, consultation, or administrative handling.

Protocol Review Information for the Inspector

Inspection Protocol Review Guidance
Protocols and the IACUC approval and monitoring of protocols should be completely and thoroughly reviewed during an inspection.

Sampling Guidance
You, the inspector, are responsible for conducting a thorough review of:

- The protocol approval process
- The IACUC’s monitoring of protocol activity
- IACUC approved protocols and changes to protocols

Detailed below is guidance to assist you in evaluating the IACUC protocol review. However, you must use the regulations and your professional judgment to determine if an IACUC or protocol is in compliance.

NOTICE
If a protocol has been reviewed by an AC inspector within the last year, then the VMO should use his/her professional judgment to determine if it is necessary to conduct another review. The following guidance applies to protocols which have been initially approved, or have had significant changes approved, since the last inspection.

Prepare:

- Write down the necessary ID information for animals about which you have a concern, and
- Review the most recent annual report to identify species and numbers of animals used in columns E and D and all protocols with reported exemptions or exceptions, and
- Determine that you are aware of, and have access to, all protocols subject to AWA regulations, including but not limited to:
active protocols
inactive protocols from the past 1 year, and
protocols where no regulated species are currently present at the facility

**Review:**
Then always review the following protocols:

- All protocols identified during inspection as of concern
- All column E protocols
- All protocols with IACUC-approved exemptions/exceptions
- Protocols cited as noncompliant and not corrected during the last inspection

**Review Additionally:**

- If the facility has five or fewer remaining protocols, review all remaining protocols.
- If the facility has greater than five remaining protocols, select five additional protocols to include at least one protocol from each of the following categories, if applicable:
  
  - Select one protocol for each regulated species present.
  - For the following high risk procedures, select one from each of the categories below, if applicable:
    - Potentially painful/distressful procedures (Column D)
    - Antibody production
    - Food/water restriction
    - Neuromuscular blockers
    - Surgical procedures
    - Teaching or trauma training protocols
    - Toxicity studies
    - Infectious disease studies
    - Vaccine potency/efficacy studies
**Research Facility Protocol Selection Worksheet**

You must complete the Protocol Selection Worksheet when you are reviewing protocols. See Research Facility Protocol Selection Worksheet on page 7-57.

Instructions for completing the Protocol Selection Worksheet are as follows:

- A protocol should only be counted once, even if it falls into more than one selection criteria.
- **All Column E protocols** should be counted in the Column E row (Row #2) even if they also fit into another selection criteria.
- **For all other protocols**, use your professional judgment for deciding which selection criteria is most appropriate for a protocol to be counted in.
- **Total Protocols Selected and Reviewed** should equal the sum of Rows 1-5.

After completing the worksheet, you should:

- Submit the Worksheet (with the facility’s inspection report) which will be scanned into ACIS at the RO.
- Keep a copy for your records.
- Leave a copy with the research facility if requested by the facility.

**NOTICE**

If you think that following these requirements will result in the expenditure of an inordinate amount of time, seek guidance from your SACS.

**Verification of IACUC Activities**

Ways to verify IACUC activities include, but are not limited to:

- Audio meeting minutes
- Compliance Office/Officer activities, if the facility has a Compliance Office
- Correspondence
- Email correspondence and email records
- Interviews with IACUC members
- Memos/notes
- Protocols
- Protocol submission forms
- Written meeting minutes
Protocol Approval Process
You, the inspector, should conduct a thorough review of the IACUC’s protocol approval process to ensure that the IACUC is following the regulations and procedures as outlined in the “IACUC Protocol Review” subsection.

Specific Types of Protocols
Painful/Distressful Procedures (see Policy #12)
When reviewing protocols involving procedures that may cause more than momentary or slight pain/distress/discomfort (protocols in Categories D and E), some areas to pay special attention to include, but are not limited to:

◆ The principal investigator has considered alternatives to the painful/distressful procedure.
◆ There is a detailed narrative describing the methods and sources used to determine that no alternatives to the painful/distressful procedure are available.
◆ Measures used to alleviate the pain/distress are clearly stated and adequate, including:
  ▶ Drugs, dosages, routes, and frequency of administration
  ▶ Other methods, including but not limited to:
    ▸ Acupuncture
    ▸ Hydrotherapy
    ▸ Hot/cold packs
  ▶ A pro re nata (PRN or “as needed”) frequency of administration is not acceptable unless there are detailed instructions and criteria for determining administration of the drug.
◆ Availability of experienced personnel, especially at night and on weekends and holidays, to assess and administer pain relief
◆ If pain/distress relief is not to be used, there is an adequate justification and endpoints are described that will be used to terminate the study and/or used as the basis for when treatment or euthanasia will be performed.
◆ The principal investigator has consulted and involved the attending veterinarian or his/her designee in the planning of the procedure and pain/distress relief.
◆ There is not the use of paralytics without anesthesia.
◆ Animals experiencing severe or chronic pain/distress that cannot be relieved will be humanely euthanized.
◆ The endpoint has been determined and identified.
Antibody Production Protocols
When reviewing protocols involving antibody production, some areas to pay special attention to include, but are not limited to:

◆ The principal investigator has considered alternatives for painful/distressful procedures.
◆ An alternative search, if done, was properly conducted and reviewed for possible alternative procedures and a rationale provided as to why available alternatives cannot be used.
◆ The justification for the number of animals to be used was appropriate, such as the amount of antibody needed and the amount which can be produced by an animal.
◆ There is a complete description of the procedure to induce antibody production and the collection of blood/serum.
◆ If adjuvants likely to cause more than momentary pain/distress, such as Freund’s Complete, are being used, there is at a minimum:
  ❖ Justification for its use
  ❖ A listing of possible adverse reactions
  ❖ Adequate care of the animal if adverse reactions occur

Food and/or Water Deprivation or Restriction
When reviewing protocols involving food and/or water deprivation or restriction, some areas to pay special attention to include, but are not limited to:

◆ The food/water deprivation or restriction is adequately justified.
◆ If the animals are likely to experience distress, the principal investigator has considered alternatives to the distressful procedures.
◆ A search for alternatives, if done, was properly conducted and reviewed for possible alternatives to procedures that may cause more than momentary pain or distress.
◆ Procedures used to restrict food/water are adequately described and easily understood.
◆ Procedures for selection of animals and training and monitoring the animals are described in detail.
◆ Baseline physiological data is being collected.
◆ Physiological parameters are being monitored during the study, such as:
  ◆ Body weight
  ◆ Hydration status
  ◆ Behavioral changes
  ◆ Plasma osmolality
◆ Medical/research records are being maintained and contain information on the monitoring of the animals, if required by the protocol, Program of Veterinary Care, or Institutional policy.
◆ Supportive care is provided to any animal suffering dehydration or stress.
◆ If supportive care is not provided, there is an appropriate scientific justification for not doing so.
◆ How the animals’ daily food and water intake was determined.
◆ The protocol addresses how the animal is to receive its required daily food or water intake, such as:
  ◆ During its working sessions
  ◆ Supplementation to the amount consumed during working sessions
  ◆ Whether small amounts of food or water provided as rewards are, or are not considered part of the animals’ daily food or water requirement
◆ If the animal is not to receive its daily food and water requirement, procedures and parameters for monitoring the animal are detailed in the protocol.
◆ The endpoint has been determined and identified.

**Neuromuscular Blockers**

When reviewing protocols involving the use of neuromuscular blockers (NMB), some areas to pay special attention to include, but are not limited to:

◆ The use of the NMB is appropriate
◆ The use of the NMB is adequately described in the protocol including, but not limited to:
  ◆ Name of NMB
  ◆ Dosage
  ◆ Timing of administration
Method of anesthesia
- The NMB is being used with general anesthesia
- All personnel working with the animal and NMB are properly trained in its use and possible adverse reactions
- The animal is being properly monitored, such as:
  - Heart rate and blood pressure
  - Level of anesthesia

**NOTICE**

Pain withdrawal response is **not** an appropriate measure of level of anesthesia as this response would be prevented by the NMB. The use of a peripheral nerve stimulator is strongly recommended as part of the monitoring procedure when NMB’s are being used on an animal.

- Appropriate supportive care, such as ventilatory support, is being provided during anesthesia
- Surgical and anesthesia records are being kept and contain the appropriate information
- Recovery procedures are appropriate, i.e.:
  - The animals are reversed from the NMB when reversal agents are available before being allowed to recover from the anesthesia
  - Recovery is being monitored

**Surgical Procedures**

When reviewing protocols involving surgical procedures, some areas to pay special attention to include, but are **not** limited to:

- The pre-procedural care and surgical preparation of the animals are clearly stated, drugs given prior to and during the procedures, such as analgesics, tranquilizers, and anesthetics, are appropriate and at the correct dosage for the species.
- The surgical procedure is stated clearly and in detail.
- All survival surgeries are performed using aseptic technique.
- Major operative survival surgeries on non-rodents are performed in a dedicated surgical facility.
- **No** animal is being used in more than one major operative survival surgery unless appropriately approved.
- Post-surgical procedures are stated clearly and in detail, such as:
  - Observation and monitoring of recovery
  - Any special recovery environment requirements
◆ Pain/discomfort relief measures are stated clearly and in detail including, but not limited to:
  ❖ When drugs are to be administered
  ❖ Drug, dose, route, and frequency of administration
  ❖ Signs of pain/distress
  ❖ Contact person(s)
  ❖ Other or additional methods of pain/distress relief

**Teaching Protocols**
When reviewing teaching protocols, some areas to pay special attention to include, but are not limited to:

◆ The rationale for the number of animals to be used was appropriate, such as the number of students per animal and procedures needed to be learned

◆ A consideration of alternatives for procedures that might cause more than momentary pain or distress was properly conducted and reviewed for possible alternative procedures, such as the use of:
  ❖ Veterinary mannequins
  ❖ Live tissue alternatives
  ❖ Mechanical teaching devices

◆ There is a complete description of the procedures to be used

◆ The number of procedures to be performed on each animal is clearly stated, such as injections per animal

◆ The personnel doing the teaching are qualified and properly trained

◆ If the teaching procedures cause more than momentary or slight pain or distress, proper methods are used to alleviate the pain/distress

**Toxicity and Vaccine Potency/Efficacy Studies**
When reviewing protocols involving toxicity and vaccine potency/efficacy studies, some areas to pay special attention to include, but are not limited to:

◆ A consideration of alternatives (reduction, replacement, or refinement) for procedures that might cause more than momentary pain or distress was properly conducted and reviewed for possible alternative procedures, such as, but not limited to:
  ❖ Revised up-and-down procedure (UDP) as a refinement to LD50 studies (refinement, reduction)
  ❖ Use of cell cultures and tissue assays, such as for dermal and ocular safety testing
Use of sequential testing and fewer animals to identify dermal and ocular chemical hazards (reduction)

NOTICE
The Interagency Coordinating Committee on the Validation of Alternative Methods provides a list of some alternative tests.

◆ The rationale for the number of animals to be used was appropriate.
◆ If the number of animals required is set by a government agency, the specific regulation or guideline is cited in the protocol.
◆ Appropriate methods are being used to relieve any pain or distress, unless scientifically justified.
◆ Animal technicians and caretakers are properly trained in identifying problems and procedures to follow.
◆ Humane end points for when the study can be terminated or that can be used as the basis for euthanasia or treatment have been determined and identified.

NOTICE
Non-farm animals, such as hamsters, Guinea pigs, and rabbits, used to develop and test vaccines for farm animals are covered under the AWA.

Inspection Procedures
Listed below are some additional aids to assist you in determining if the procedures outlined in the protocols are being followed.

NOTICE
Animals may be held, but **cannot** be used **without** being on a protocol.

◆ Ask how the research facility keeps track of the number of animals approved by the IACUC and the number of animals used by the principal investigator, such as:
  ◆ Computer records
  ◆ Acquisition and disposition records
  ◆ Dead animal records
  ◆ Inventory cards
◆ Ask how the facility checks the accuracy of its methods for tracking the number of animals.
◆ Ask for exemption/exceptions to the regulations or standards, then check the protocol to determine that the exemption/exception was approved.
◆ Determine if the animal care staff is familiar with the protocol procedures, especially pre- and post-painful/distressful procedure care, such as:
- Asking the staff
- Checking the availability of protocols
- Checking the availability of standard operating procedures
- Looking in medical records

- Watch the animal care staff, principal investigators, or laboratory personnel handle the animals (or ask them to handle the animals, if appropriate).

- Review medical records/investigator’s logs to determine that animals with painful/distressful procedures received the proper pain/distress relieving drugs, if applicable.

- Observe animals for signs of unrelieved pain.

- Ask about weekend staffing, animal observation, and medical care.

- Determine if the medical or emergency contact numbers are current and readily available, such as:
  - On bulletin boards
  - In the animal rooms
  - In medical records/charts
  - In protocols

- Observe surgeries to determine that they are being conducted using aseptic technique and in dedicated surgical facilities, if required.

- Ask how the research facility tracks animals to ensure that they are not used for another survival surgery (unless approved by the IACUC or APHIS), such as:
  - Health records
  - Individual animal records
  - Cage cards
  - Surgery records
  - Investigator’s logs

- For APHIS-approved multiple major survival surgeries, verify that the stipulations in the approval letter are being met.
## Table 7-1  Species-Typical Signs of Pain

<table>
<thead>
<tr>
<th>Species</th>
<th>Possible Signs of Pain$^1$  $^2$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dogs</td>
<td>Quiet, unwilling to move, abnormal posture, lack of alertness, whimpering, groaning, howling, shivering, loss of appetite, increased respiration, growl or exhibit apprehension when approached</td>
</tr>
<tr>
<td>Cats</td>
<td>Ungroomed appearance, quiet, apprehensive facial expression, loss of appetite, crying, hissing, hiding, crouching or hunching</td>
</tr>
<tr>
<td>Guinea Pigs</td>
<td>Quiet, decreased food and water consumption, anorexia</td>
</tr>
<tr>
<td>Hamsters and Gerbils</td>
<td>Decreased activity, piloerection, ungroomed appearance</td>
</tr>
<tr>
<td>Rabbits</td>
<td>Inactivity, appear apprehensive or anxious, hunched appearance, hide, squeal or cry, possible aggressive behavior with excessive scratching and licking</td>
</tr>
<tr>
<td>Nonhuman Primates</td>
<td>Stops eating and/or drinking, stops grooming</td>
</tr>
<tr>
<td>Cattle</td>
<td>Dull, depressed appearance, heads bowed, lack of alertness, loss of appetite, rapid/shallow breathing, rigid posture</td>
</tr>
<tr>
<td>Sheep and Goats</td>
<td>Similar to cattle, also vocalization, teeth grinding, increased lip curling</td>
</tr>
<tr>
<td>Pigs</td>
<td>Changes in overall demeanor, social behavior, gait and posture, unwilling to move, hiding, excessive squealing when handled</td>
</tr>
</tbody>
</table>

---


$^2$ These are possible signs of pain and do not necessarily mean the animal is in pain. A lack of these signs also does not mean that the animal is not in pain.
Protocol Review Information for the Registered Research Facility

Procedure for Protocol Review
The IACUC is responsible for the review and approval of all proposed activities related to the care and use of animals. [2.31]

Procedure
A written protocol, i.e., a proposal for animals use activities, must be submitted to and approved by the IACUC prior to the start of any animal use activity.

The IACUC must review all submitted protocols and decide to: [2.31(c)(6)]

◆ Approve the protocol, or
◆ Require modifications in the protocol to secure approval, or
◆ Withhold approval of the protocol

The IACUC review must be conducted by: [2.31(d)(2)]

◆ Full Committee review, or
◆ A subcommittee of at least one member of the IACUC designated by the IACUC chair who:
   Is qualified to conduct the review, and
   Has the authority to:
     ⇒ Approve
     ⇒ Require modifications in the protocol to secure approval, or
     ⇒ Request a full IACUC review of the protocol

NOTICE
This person or subcommittee might be referred to as the Designated Reviewer(s) or Designated Member(s).

Prior to IACUC review, each member of the IACUC must be provided the following: [2.31(d)(2)]

◆ A list from the IACUC chair or his/her designee of the protocols to be reviewed
◆ A copy of any protocol, upon request

NOTICE
Any member of the IACUC may request, and must be granted, a full Committee review of a protocol.
No member of the IACUC or subcommittee may grant approval of a protocol until the entire IACUC has been informed that the protocol is to be reviewed, and members are given the opportunity to read the protocol.

If an IACUC member has a conflicting interest with a protocol being reviewed, e.g., is personally involved, that member may not: [2.31(d)(2)]

- Contribute to the constitution of a quorum
- Participate in the review or approval of the protocol

**NOTICE**
The member may provide information about the activity proposed in the protocol.

**Full Committee Review**
If a protocol is reviewed by the full committee: [2.31(d)(2)]

- The review **must** be conducted at a convened meeting with a quorum of the IACUC, and
- Approval **must** be by a majority vote of the quorum

**Subcommittee Review (Designated Reviewer)**
The Designated Reviewer(s) has the authority to:

- Approve a protocol
- Approve a significant change(s) to a protocol
- Require modifications to a protocol/significant changes
- Request a full IACUC review

A protocol or significant change approved by the Designated Reviewer does **not** need to be reviewed and approved by the full IACUC.

**NOTICE**
*Only* after all members of the IACUC have decided that a full committee review of a protocol is **not** necessary, can the protocol be reviewed by the Designated Reviewer.

**Consultants**
The IACUC may confer with a consultant(s) or the principal investigator(s) to aid in understanding complex areas of a protocol. [2.31(d)(3)]

Unless the consultant is a member of the IACUC, he/she must **not**: [2.31(d)(3)]

- Approve or withhold approval of a protocol
- Vote with the IACUC
Notification
The IACUC must notify the principal investigator(s) and the appropriate person(s) at the research facility (usually the Institutional Official or his/her designee) in writing of its decision regarding the approval of the protocol. [2.31(d)(4)]

If the IACUC decides to withhold approval or require modifications in the protocol, it must: [2.31(d)(4)]

◆ Include in its written notification the reason for the decision
◆ Give the principal investigator(s) an opportunity to respond in person, or in writing

The IACUC may reconsider its decision to withhold approval if the principal investigator corrects the deficiencies in the protocol to the satisfaction of the IACUC. Any change in the IACUC’s decision must be documented in the minutes. [2.31(d)(4)]

Continuing Review
The IACUC must review all active protocols at least once a year, i.e., within the same month or earlier than the date of the initial approval, or more often, at the discretion of the IACUC. [2.31(d)(4) & (5)]

◆ The review may be conducted by the IACUC or a subcommittee.
◆ All IACUC members are informed of the annual reviews.
◆ All members are given the opportunity to participate in the annual reviews.
◆ The IACUC reviews and decisions are documented in writing and available for inspection.

For example, the review should consider:

◆ New activities
◆ Changes in the number and type of animal
◆ New exceptions to the AWA regulation and standards

Changes in Protocols
Changes in protocols may be handled either by full Committee review or designated member review, or by an administrative process as detailed in the “Significant Changes to Animal Activities” subsection.

Suspension of a Protocol Activity
The IACUC may suspend a previously-approved protocol activity. [2.31]
Criteria
The IACUC may suspend an activity that it previously approved if it determines that the activity is not being conducted as: [2.31(d)(6)]

- Described by the principal investigator, and
- Approved by the IACUC

The IACUC may suspend an activity only: [2.31(d)(6)]

- After review of the matter at a convened meeting of a quorum of the IACUC, and
- With a vote for suspension by a majority of the quorum

If the IACUC suspends an activity involving animals, the IO, in consultation with the IACUC, must: [2.31(d)(7)]

- Review the reasons for the suspension
- Take appropriate corrective action
- Report that action with a full explanation to the appropriate Animal Care Regional office, and any Federal agency funding that activity

Contracted Research or Projects that Involve Multiple Registrants
When registered Research Facilities (RF) contract research out to be conducted at another facility, it is the responsibility of the registrants to determine and document which party is responsible for the functions of the IACUC, animal care and handling, and reporting of the animals on the Annual Report.

No Documentation of Responsibilities
If there is no documentation of specific areas of responsibility, then:

- Both registered parties are responsible, and
- Both IACUCs should perform all required functions, and
- Only one of the RFs should report the animals on the Annual Report
- You, the inspector, should cite both RFs for any noncompliances identified.

Specific Responsibilities
If the contract designates specific responsibilities to each partner, the facility is a site of both registrants.

You, the inspector, should inspect only the designated institution for the specific responsibility agreed upon in the contract.
For example:

- RF A is designated to perform the semiannual program review and facility inspection, while both RF A and RF B are designated to review the protocol.
  - Both RF A and RF B are responsible for the protocol and both IACUC’s must approve the protocol, **but**
  - Only RF A is responsible for the semiannual review.
  - You, the inspector, inspect:
    - the protocol review and approval at both RF A and RF B, and
    - the semiannual review only at RF A.

- The contract specifies that both RF A and RF B are responsible for the IACUC functions, but only RF B is responsible for the animal care and handling, and reporting on the Annual Report.
  - You, the inspector, inspect:
    - the IACUC functions at RF A, and
    - the IACUC functions, animal care and handling, and the AR reporting of the animals under the contract at RF B.

**All Responsibilities Designated**

If RF A contracts the entire project and **all responsibilities** to RF B, then:

- The location of RF B is **not** a site of RF A.
- RF A does **not** have any responsibility for the IACUC functions, animal care and handling or Annual Reporting.
- You, the inspector, inspect **only** RF B for the IACUC functions, animal care and handling, and Annual Reporting.

Individual researchers or staff frequently partner with multiple institutions. The IACUC reviewing the protocol must assure that all personnel have appropriate training and qualifications. But this does not confer any responsibility on the other RFs with which that particular individual is associated.
Records

The research facility **must** maintain records of the IACUC’s activities. [2.35]

**Required Research Facility Records**

**IACUC Records**
A research facility must have the following records, if applicable, for review during inspection:

- Minutes of the IACUC meetings, including:
  - A list of members who were and were not present
  - All the activities conducted by the IACUC at the meeting
  - Any dissenting opinions
  - Approval of the minutes (usually of the previous meeting) by the IACUC (recommended, not required)
  - Substance of the deliberations of the IACUC, not just the decisions made
- Program of humane care and use
- Investigation of concerns
- Recommendations to the IO
- Records relating to animal activities, including:
  - Annual review of protocols
  - IACUC decisions on protocols and proposed changes
  - Notification of Principal Investigator of decisions on protocols and proposed changes
  - Notifications of suspension of protocol
  - Proposed significant changes to protocols
  - Protocols
- Semi-annual reports, including:
  - Review of humane care and use program
  - Facility inspection
  - Report of program and facility reviews to the Institutional Official, including minority views
  - IACUC-identified significant deficiencies
- Verification of appointment of IACUC members by the Chief Executive officer (CEO) or Institutional Official (IO)
Personnel Qualifications and Training
The research facility must adequately document the qualifications and training of personnel which may include, but not be limited to:

◆ Certificates of attendance at formal meetings
◆ Certificates of completion from relevant continuing education programs
◆ Curriculum vitae/resumes
◆ Diplomas or certificates from educational institutions
◆ Sign-up sheets from in-house training programs

Animal Records
A research facility must have the following records, if applicable, available for review during an inspection;

◆ Acclimation statements for transportation
◆ Acquisition and disposition records for dogs and cats
◆ Approved water and power emergency plans for marine mammals
◆ Attending veterinarian approved exemptions to the regulations or standards, usually part of an animal’s medical records
◆ Record of animals on hand for dogs and cats. (Use of APHIS Form 7005 is not required.)
◆ Certification for acquired random source dogs and cats
◆ Certification for exempt sources of dogs and cats
◆ Documentation for all other covered animals showing that current medical problems and existing chronic conditions are:
  ▶ being addressed, and/or
  ▶ receiving proper veterinary care

NOTICE
Lack of this documentation may not be cited as a stand-alone noncompliance, but must be related to the regulations and the condition of the animal.

◆ Documentation of training of attendants or employees working with marine mammals
◆ Environmental enhancement plan for nonhuman primates
◆ Exercise plan for dogs
◆ Health certificates for dogs, cats, and nonhuman primates when transported across State lines
◆ Medical records for marine mammals
◆ Necropsy records for marine mammals
◆ Program of veterinary care, if using part-time or consulting attending veterinarian
◆ Water quality records for marine mammals

**Annual Report**
Both you and the RF should have a copy of the Annual Report.

You, the inspector, should verify that the RF’s Annual Report is accurate, that is:

◆ All animal facilities are reported.
◆ Only regulated species are reported.
◆ Animals are reported in the correct column.
◆ IACUC-approved exceptions **not** provided for in Animal Welfare Act regulations and standards are reported.
◆ IACUC-approved exemptions provided for in the AWA regulations and standards are **not** reported.
◆ The number of animals reported is correct.
◆ There are appropriate explanations for all Column E animals.

You, the inspector, should verify that the RF’s Annual Report does **not** report any animals used for the following:

◆ Field studies which meet the following criteria and are therefore exempt from the regulations and do **not** require a written, approved exemption. The study does **not**: [1.1, 2.31(d)(1)]
  ❖ Harm the animals under study
  ❖ Involve an invasive procedure
  ❖ Materially alter the behavior of the animals under study
◆ Animals euthanized, killed, or trapped, and collected, such as for study or museum samples, from their natural habitat via humane euthanasia
◆ Agricultural research
◆ Food or fiber
◆ Wildlife management projects

**NOTICE**
The facility’s IACUC should be involved in the above use of animals in order to review the activity that is taking place and to ensure that the method of euthanasia is humane and appropriate, if applicable.
Methods of verifying the animal numbers include, but are not limited to:

- Asking the research facility representative to demonstrate how the number of animals was determined for:
  - A particular species, or
  - A column from the annual report
- Asking for verification of animals used by site to obtain the total number of animals used, for example:
  - Review a particular species used by site, or
  - Review a column from the annual report by site
- Counting the animals, if appropriate or feasible
- Review of:
  - Acquisition records
  - Animal ordering information, such as invoices or computer animal tracking systems
  - Animals ordered in comparison to number of animals approved for a particular protocol
  - Facility animal census records
  - Internal billing records to PIs for animal housing/care
  - Protocol medical or animal-usage records

Animals reported in Column B of APHIS Form 7023-Annual Report, should be those animals being bred, conditioned, or held for use in teaching, experiments, research, or surgery, but not yet used for such purposes.

All animals contained on the facility’s inventory on September 30 of the reporting year that were not used in a research project that year should be reported in Column B as being held for research purposes. Animals that were held but died during the year without being used for research purposes should also be reported in this column. Other animals held during the reporting year but not present at the facility on September 30 should not be reported in this column. They should be reported by the facility which possesses them on September 30.

If a research facility is licensed as a dealer:

- Breeding animals and any offspring intended for research purposes within the research facility should be reported in Column B.
- Animals intended for sale only should not be reported in Column B but should be included on the dealer license renewal.
If the research facility is unsure of the status of an animal (research or sale only), the animal should be reported in Column B.

Animals actually used for research purposes during the reporting year must be reported in Column C, D, or E, as appropriate.

**NOTICE**

If methods other than anesthetics, analgesics, or tranquilizing drugs are used to relieve pain or distress, animals can still be reported in Column D if the methods are appropriate and effective.

**NOTICE**

The use of anesthesia does not always mean that the animal should be reported in Column D. If the animal was anesthetized for a non-invasive procedure, a blood draw, or other veterinary care procedure, the animal could be reported in Column C. The RF should determine the appropriate reporting column.

If an animal was moved to another RF during the reporting year, the animal should only be reported once by either:

- the RF with the highest pain category for the animal, or
- if the pain categories are the same, then by the last RF to possess the animal.

Refer to the following documents for additional information about the annual report:

- APHIS Form 7023–Annual Report of Research Facility
- APHIS Form 7023–Instructions for Completion of APHIS Form 7023
- Assistance with Accurate Annual Reporting for Research Facilities
- Guidelines for Reporting Animals in Column B of APHIS Form 7023
- Column E Explanation of APHIS Form 7023

**Retention**

All records and required reports must be maintained: [2.35(f)]

- At least 3 years, or
- Longer if:
  - Necessary to comply with any applicable Federal, State, or local law
  - The APHIS Administrator notifies the research facility, in writing, that specified records must be retained pending completion of an
investigation or proceeding and held until their disposition is authorized.

Records must be held for at least 3 years from the date of completion of the IACUC-approved protocol. [2.35(f)]

**Availability**

Records must be available for inspection and copying by: [2.35(f), 2.38(a), 2.38(b)(1)(ii) and (iii)]

- Any APHIS official
- Any funding Federal agency representative

**Confidentiality and Removal of Records**

APHIS inspectors must: [2.35(f)]

- Maintain the confidentiality of the information
- **Not** remove the records from the research facility’s premises unless:
  - There has been an alleged violation.
  - The records are needed to investigate a possible violation.
  - The records are needed for other enforcement actions.

**NOTICE**

Release of any materials removed from the facility that contain trade secrets, or commercial or financial information that is privileged or confidential, will be governed by applicable sections of the Freedom of Information Act.

You, the inspector, should follow the guidelines below when removing records from a research facility:

- Only take photos or copies of records off-site if needed to support a Direct, critical or repeat citation, or when there is a disagreement between you and the research facility over an NCI and the research facility has indicated that it is likely to appeal the citation. Do NOT remove original records.
- Make copies or scan records, instead of photographing, if possible.
- Be sure the research facility knows what records were copied, scanned, and/or photographed before leaving the facility.
- Give the research facility the opportunity to redact names, locations, and other PII before taking photos, scanning, or making copies of the record. You should allow the facility 24 to 48 hours for this redaction.
- Provide the research facility the opportunity to view your photos, if requested. If possible, delete or retake any photos that the facility states
may contain potential PII, or confidential or proprietary information to remove or block the sensitive information. If the noncompliance cannot be documented without the inclusion of potentially confidential or proprietary information, ensure that the photograph label states: “May contain confidential or proprietary information.”

Electronic Communication

Some forms of electronic communication systems may be used to conduct IACUC functions.

IACUC Meetings

The IACUC meetings should allow members to be in direct communication to consider, deliberate, and vote on areas of their responsibility. This is traditionally done by face-to-face meetings.

The IACUC may conduct its activities using electronic communication systems which allow all members to be in direct communication, if all of the following criteria are met:

◆ All members are given notice of the meeting.
◆ Documents normally provided to members during a physically-convened meeting are provided to all members in advance of the meeting.
◆ All members have access to the documents and the technology necessary to fully participate.
◆ A quorum of Committee members is convened when required.
◆ The communication system allows for real time verbal interaction equivalent to that occurring in a physically-convened meeting (i.e., members can actively and equally participate and there is simultaneous communication).
◆ If a vote is called for, the vote occurs during the meeting and is taken in a manner that ensures an accurate count of the vote.

NOTICE

A mail ballot or individual phone polling cannot substitute for a convened meeting.

◆ Opinions of absent members that are transmitted by mail, telephone, fax, or email may be considered by the convened IACUC members, but may not be counted as votes or considered as part of the quorum.
◆ Written minutes of the meeting are maintained as required by the AWA regulations.

All activities conducted via electronic communication must be documented in writing and original or electronic signatures obtained, when required.
Examples of electronic communication systems include, but are not limited to:

- Audio-visual conferencing, including webinar-based forums
- Conference calls

Fax, email, and one-on-one communication via telephone are not acceptable methods for conducting IACUC functions which require a convened meeting, such as:

- Full committee review
- Suspension of an approved activity

The use of email or one-on-one communication via telephone for these activities is citable under 2.31(d)(2), 2.31(c)(3), or 2.31(d)(6).

---

**Guidance for Veterinary Schools and Veterinary Technician Programs (VTP) for the Inspector**

**Teaching Versus Research**

The definition of activity in Part 1 of the AWA means, those elements of research, testing, or teaching procedures that involve the care and use of animals.

For the purposes of the AWA, teaching is equivalent to research. Using farm animals for teaching agricultural students is not regulated, while using farm animals for teaching veterinary/vet tech students is regulated.

**Registration Requirements**

**Always Registered**

A registration is needed if live covered animals utilized for teaching purposes are owned by the facility.

**EXAMPLE**

- Facility purchases or obtains donated animals from any source
- Facility uses animals that do not fall under a veterinary client patient relationship (VCPR)

A VCPR as defined by the AVMA is present when all of the following requirements are met:

- The veterinarian has assumed the responsibility for making clinical judgments regarding the health of the patient and the client has agreed to follow the veterinarians' instructions.
- The veterinarian has sufficient knowledge of the patient to initiate at least a general or preliminary diagnosis of the medical condition of the patient.
This means that the veterinarian is personally acquainted with the keeping
and care of the patient by virtue of a timely examination of the patient by
the veterinarian or medically appropriate and timely visits by the
veterinarian to the operation where the patient is managed.

◆ The veterinarian is readily available for follow-up evaluation or has
arranged for the following: veterinary emergency coverage, and
continuing care and treatment.

◆ The veterinarian provides oversight of treatment, compliance, and
outcome.

◆ Patient records are maintained.

**NOTICE**

If a registered VTP is conducting non-regulated activity at a clinic, shelter, or farm,
these locations should not be added as sites of the VTP.

**Usually Not Registered**

A registration may not be needed if the facility does not own any of the
regulated animals utilized for teaching and all animals used are either:

◆ Patients (which could include work performed for a shelter), or

◆ Pets whose owners are always present. This would include animals at
clinics, shelters or farms where a staff person is onsite and available to
observe the activities.

**Special Circumstances That May Require Registration**

These and other special circumstances must be evaluated with the SACS on a
case-by-case basis.

◆ A “pet”, including animals belonging to a student, staff or faculty, is
housed at the facility and used in different teaching situations without the
owner being present.

◆ Animals not owned by the facility are housed at the facility for an
extended period of time.

**AVMA Accreditation**

The AVMA does **not** require that a VTP be registered with the USDA.

The AVMA does require that the VTP apply AWA guidelines to all animal use.
All animal activities conducted by a program must be approved by an animal
care and use committee whose structure and function are in accordance with
AWA requirements.
Licensing Requirements for Providing Animals to VTP

No License Required
The following sources of animals do not require a license:

- Persons donating animals to the vet tech program
- Exempt persons who have certified that the dogs and/or cats being sold were born and raised on the persons’ premises and that they have sold fewer than 25 dogs and/or cats that year for research
- Municipal pounds or shelters

Dealers License Required
The following sources of animals require a license:

- Private shelters, unlike municipal and contract pounds, are not exempt from the licensing requirements if animals are being sold (as opposed to being donated). Rescue groups fall into the category of private shelters.
- Dealers who breed and raise regulated animals for covered activities.

Inspection Procedures
You (the inspector) should only inspect the animals and animal facilities for animals owned by the facility.

Do not inspect animals or housing areas for animals owned by other entities such as vet clinics, hospitals, shelters, or animals that fall under a veterinary client patient relationship.

For Veterinary School Spay/Neuter Programs, IACUC oversight is not required if the Veterinary School has a written agreement with a pound/shelter, which is acting as the owner of the animals, soliciting the service of the Veterinary School to perform spaying/neutering. The service is considered to be rendered under a valid Veterinary-Client-Patient relationship.

If the facility asks you to inspect or look at non-regulated animals or facilities, you may go through these areas with the facility representative but do not document any findings on an inspection report. Consult your SACS if further guidance is necessary.
Records Requirements
For regulated animals used in regulated teaching activities, the records requirements are the same as for any other research facility.

The following records must be available for review during the inspection, if applicable:

- Acquisition/disposition records
  - Must be kept for any dogs or cats acquired by the facility that do not fall under a veterinary client patient relationship
- Annual Reports

Acquisition/disposition records are not required for:

- Dogs/cats used in the context of a veterinary client patient relationship, however the ownership of these animals should be clear in other facility records maintained as part of the veterinary client patient relationship.
- All regulated animals other than dogs and cats

All regulated species of animals used for regulated purposes must be included on the annual report.

The following animals should not be included on the annual report:

- Client, staff, or student-owned animals utilized in the presence of the owner
- Animals utilized for teaching purposes at working farms, ranches, veterinary hospitals or shelters if used in the context of a veterinary client patient relationship.
- Animals used in the context of a veterinary-client-patient relationship.

Records must be held for at least three years (beyond the final disposition of the animal). [2.35(f)]

Identification Requirements
For regulated animals used in regulated teaching activities, the animal identification requirements are the same as for any other research facility.

Research facilities are only required to individually identify dogs and cats.[2.38(g)]

There are no individual identification requirements for other regulated species.
Protocols
For protocols involving regulated animals used in regulated teaching activities, protocol and IACUC oversight requirements are the same as for any other research facility.

For animals that are not regulated by the AWA (i.e. pets or patients) no protocols or IACUC oversight is required.

Special Considerations
Contact your SACS if any of these circumstances come to your attention via inspection or another method:

- Complaints are received regarding the welfare of the animals
- Inspector becomes aware of animal injury or death as the result of non-regulated teaching procedures
- The owner of an animal expresses concern about its care or use
- It is unclear if a veterinary client patient relationship actually exits
### Holding Period Regulations Summary Chart

<table>
<thead>
<tr>
<th>Reg</th>
<th>Applies To</th>
<th>Holding Period</th>
<th>Species</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.38(j)</td>
<td>Research Facilities acquiring dogs and cats from sources OTHER than licensees and exempt* persons</td>
<td>5 full days (not including day of acquisition and time in transit)</td>
<td>Applies to live dogs and cats</td>
<td>The hold is performed by the research facility. The hold only applies when the vet tech program permanently obtains the animals.</td>
</tr>
<tr>
<td>2.101</td>
<td>Dealers/Exhibitors</td>
<td>5 days (not including day of acquisition and time in transit)</td>
<td>Applies to live dogs and cats</td>
<td>The hold is performed by the licensee acquiring the animal.</td>
</tr>
<tr>
<td>2.101(a)**</td>
<td>Dealers/Exhibitors who acquire from a private or contract pound/shelter</td>
<td>10 days (not including day of acquisition and time in transit)</td>
<td>Applies to live dogs and cats</td>
<td>The hold is performed by the licensee acquiring the animal.</td>
</tr>
<tr>
<td>2.101(a)2**</td>
<td>Dealers/Exhibitors who acquire animals from another licensee</td>
<td>24 hours (not including time in transit). <strong>SEE COMMENTS</strong></td>
<td>Applies to live dogs and cats</td>
<td>The live dogs or cats MUST have completed an initial 5 day holding period with the first licensee to acquire the animal. OR The live dogs or cats MUST have completed a 10 day holding period with the first licensee, if this licensee acquired the animal from a private or contract shelter/pound. Once the initial 5 or 10 day period is completed, each subsequent dealer/exhibitor need only hold for 24 hours (not including transit time).</td>
</tr>
<tr>
<td>2.133</td>
<td>Municipal, contract and private pounds and shelters, Research facilities also licensed as dealers** WHEN THESE FACILITIES SELL/PROVIDE LIVE DOGS/CATS TO LICENSED DEALERS</td>
<td>5 full days, to include a Saturday (not including day of acquisition and time in transit)</td>
<td>Applies to live dogs and cats</td>
<td>This is the hold performed by the pound or shelter. For random source animals: dealers must provide to recipients a certification that includes: -Information about themselves (the dealer (name/address/cert#) -Recipient info (name/address/cert# if applicable, signature) -Name/address of person/pound/shelter the animal was originally acquired from, with an assurance that the person/pound/shelter was notified the animal might be used for research. -Signed statement from pound or shelter that animal met holding requirement (must include a USDA ID # ) -Date animal was acquired by dealer -Description of animal (USDA approved ID, species/breed/sex/age/color/markings) Dealers must keep certifications at least 1 yr following disposition (research facilities must keep for 3 yrs).</td>
</tr>
<tr>
<td>2.132</td>
<td>Random Source B Dealers (allowable sources)</td>
<td>See Section 2.101</td>
<td>Applies to live dogs and cats</td>
<td>Allowable Sources of dogs/cats 1. Other licensed dealers 2.State/county/city owned and operated pounds/shelters 3.private or contract shelter/ pound 4. If to be sold by B dealer for research: persons who certify that animals were bred and raised on their premises AND who have sold fewer than 25 dogs and/or cats that year 5. If to be sold by B dealer for pets: persons who certify that animals were bred/raised on premises AND maintain 3 or fewer breeding female dogs and/or cats.</td>
</tr>
</tbody>
</table>

*Municipal (city/county/state) pounds shelters cannot be licensed as dealers, and so are considered exempt sources for licensing requirements. HOWEVER, they are NOT considered exempt for the purposes of 2.38(j). **Exceptions to holding periods required by dealers/exhibitors: 2.101 (3): Animals may be euthanized at any time for disease/injury/emaciation 2.101 (4): Live dogs/cats 120 days old or less if obtained from the person who bred/raised the animal, are only subject to a 24 hour hold (excluding transit time). The same 24 hour hold applies to any subsequent dealer/exhibitor who acquires the animal.
## Research Facility Protocol Selection Worksheet

**Research Facility Protocol Selection Worksheet**

<table>
<thead>
<tr>
<th>Reason Protocols Were Selected for Review</th>
<th>How Many Protocols Were Selected</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Protocols identified during inspection of concern (select all)</td>
<td></td>
</tr>
<tr>
<td>2. Column E protocols (select all)</td>
<td></td>
</tr>
<tr>
<td>3. Protocols with IACUC-approved exemptions/exceptions (select all)</td>
<td></td>
</tr>
<tr>
<td>4. Protocols cited as noncompliant and not corrected during the last inspection (select all)</td>
<td></td>
</tr>
<tr>
<td>5. Additional Protocols Selected:</td>
<td></td>
</tr>
<tr>
<td>a. If ≤5 remaining protocols, select all remaining:</td>
<td></td>
</tr>
<tr>
<td>b. If &gt;5 remaining protocols, select 5 additional protocols.</td>
<td></td>
</tr>
<tr>
<td>1) Protocols for each regulated species and/or,</td>
<td></td>
</tr>
<tr>
<td>2) Protocols involving high risk procedures (see Chapter 7, Animal Welfare Inspection Guide for guidance)</td>
<td></td>
</tr>
</tbody>
</table>

**Total Protocols Selected and Reviewed**

---

* Protocol selection guidance applies to protocols which have been initially approved, or have had significant changes approved, since the last inspection. For protocols reviewed by an Animal Care Veterinary Medical Officer within the last year, professional judgment should be used in determining whether another review is necessary.

---

**Figure 7-2  Research Facility Protocol Selection Worksheet**
Chapter 8

Confiscation Information

Contents

Introduction 8-2
Criteria for Confiscation 8-4
  Veterinary Care Issues 8-4
  Shelter/Housing 8-9
  Separation/Behavior 8-13
  Feed/Water 8-13
  Husbandry/Cleaning 8-15
  Ventilation/Air Quality 8-17
  Handling 8-17
Chronic Issues that Demonstrate a Pattern of Suffering 8-20
  Veterinary Care 8-20
  Shelter 8-22
  Sanitation 8-22
  Feed 8-23
  Water 8-23
  Separation 8-24
Guidelines and Responsibilities for Confiscation of Animals 8-25
  Recognition of Suffering by Animal Care 8-25
  Animal Care Inspector Responsibilities 8-25
  SACS Responsibilities 8-26
  Regional Director Responsibilities 8-27
  Security 8-28
  Confiscation Timeliness 8-29
  Authorized Representative is Unavailable 8-29
Sample Letters 8-30
Introduction

This chapter provides some criteria to help inspectors determine if a situation warrants a possible confiscation. When an animal is determined to be suffering and relief is not provided by the facility, and there is no evidence relief will be provided in the immediate future, confiscation should always be considered.

The New Merriam-Webster Dictionary defines suffering as: pain, misery, or hardship; and the term suffer: to feel or endure pain, to bear loss, damage, or injury. Animals are deemed to be suffering when they are forced to endure conditions which cause pain or distress, severe discomfort or which could directly impact the health and well-being of the animal if actions are not taken to remedy the situation. Animals do not need to be in imminent danger of dying to be considered suffering.

Although conditions at a facility can change dramatically over a short period of time, there are some red flags that could indicate this facility might be a potential candidate for confiscation at a later date.

Common red flags include:

◆ Facilities that require three or more prelicense inspections before they come into compliance, especially if the issues relate to basic husbandry practices and/or veterinary care

◆ Facilities that are remote and have difficulty obtaining veterinary services or do not have a strong working relationship with their attending veterinarian (AV)

◆ Facilities that operate on a limited budget or have financial difficulties

◆ Facilities that have limited employees and/or have questionable knowledge about the care of one or more species they keep

◆ Facilities that are frequently cited for access issues because there is no one routinely at home to take care of the animals

◆ Facilities that acquire dangerous animals, such as big cats, when their license was issued when they only owned non-dangerous animals
Being aware of these red flags can mentally prepare you for the possibility that the facility may not be able to quickly or adequately remedy issues related to animal suffering.

Being mentally prepared for a possible confiscation may directly impact the efficiency of the whole process. Mentally going through the steps of a confiscation in the early planning stages may make the difference between the success or failure of the operation.
Criteria for Confiscation

The following information pertains to situations where confiscation should be considered for exotic or wild animals.

Veterinary Care Issues

Veterinary care issues include, but are not limited to:

- Animals are found with broken bones or open wounds
- Animals are found with matted hair causing skin problems
- Animals are found to be dead or dying
- Animals are found to have severe chronic skin or eye issues
- Animals are observed to have chronic, untreated intestinal issues
- Animals are severely lethargic with no veterinary attention
- Animals are severely malnourished and/or emaciated
- Animals are found to have severe chronic skin or eye issues

The photos below are samples of veterinary care issues to be considered for confiscation, including emaciation or evidence of malnourishment.

Figure 8-1  Emaciated Asian Elephant

Source: USDA-APHIS
Figure 8-2 Emaciated Lion

Figure 8-3 Thin Tiger with Chronic Poor Hair Coat
Other chronic or untreated veterinary problems are shown below.

Figure 8-4  Emaciated Dog, Dorsal View

Figure 8-5  Chronic Untreated Eye Problems
Figure 8-6  Eye Problems

Figure 8-7  Serious Untreated Tail Injury of Cougar

Figure 8-8  Ruptured Abscess on Dog
Figure 8-9  Bloody Feces

Source: USDA-APHIS

Figure 8-10  Dead Dog in Enclosure

Source: USDA-APHIS

Figure 8-11  Overgrown Hooves

Source: USDA-APHIS
Confiscation Information
Criteria for Confiscation

Shelter/Housing
Examples of shelter and housing issues include, but are not limited to:

◆ No bedding is provided for the animals and the temperatures are below 50 °F and the animals are showing clear signs of stress or discomfort (shivering, huddled in corners, etc.)

◆ No shelter/shade is provided for the animals with extreme temperatures (high or low)

◆ Shelter provided for the animal has excessive accumulation of feces and waste
Confiscation Information
Criteria for Confiscation

- Shelter provided has accumulations of wet and/or dirty bedding
- Shelter provided is too small for the animals

The following photos are examples of shelter and housing issues to be considered for confiscation.

**Figure 8-14 Chained With No Access to Shade**

![Chained With No Access to Shade](source: USDA-APHIS)

**Figure 8-15 Inadequate Sized Shelter for Four Wolves**

![Inadequate Sized Shelter for Four Wolves](source: USDA-APHIS)
Confiscation Information
Criteria for Confiscation

Figure 8-16  Shelter Not Structurally Sound

Figure 8-17  No Bedding, Rusted Enclosure

Figure 8-18  Dogs With No Shelter or Shade
Confiscation Information
Criteria for Confiscation

Figure 8-19  Dogs With No Shade

Source: USDA-APHIS
**Separation/Behavior**
Examples of separation/behavior issues include, but are not limited to:

- Animals are housed in incompatible groups and fighting
- Social animals are housed alone and showing signs of stress

**Feed/Water**
Feed and water issues include, but are not limited to:

- Food/water is contaminated
- Insufficient and poor quality food
- **No** food or water available to the animals
- Water and food receptacles are **not** being kept clean and sanitized

The following photos depict feed and water issues.

![Poor Quality Rotting Chicken](Source: USDA-APHIS)

**Figure 8-20  Poor Quality Rotting Chicken**

![Rotting Carcass in Cougar Enclosure](Source: USDA-APHIS)

**Figure 8-21  Rotting Carcass in Cougar Enclosure**
Figure 8-22  Poor Quality Chicken and Meat

Figure 8-23  Self Feeder with Moldy Food

Figure 8-24  Mouse Feces in Feeder
Husbandry/Cleaning

Examples of husbandry and cleaning issues include, but are not limited to:

- Enclosures containing animals are extremely wet or covered with excessive accumulations of feces
- Severe pest infestation
- Water and food receptacles are not being kept clean and sanitized
- Ventilation is poor and air quality is affected

The following photos depict husbandry/cleaning situations to consider for confiscation.
Figure 8-27  Extremely Soiled, Overcrowded Hamster Enclosure

Figure 8-28  Extremely Soiled Rabbit Enclosure

Figure 8-29  Excessive Accumulation of Feces in Trays Under Dog Run
Confiscation Information
Criteria for Confiscation

Ventilation/Air Quality
The bar for states or counties is typically “neglect.” Each state or county can view the level of ammonia needed to indicate neglect as they deem appropriate. Our bar for confiscation is “suffering.” So we either have to be able to photograph the current conditions and interpret that as suffering, or when conditions cannot be photographed, document that the animals showed clinical signs of suffering. With ventilation there is nothing to photograph, and there is no accepted measurement of ammonia that is considered too high for a given species. We have to be able to document the animals showing clinical signs, such as squinting, conjunctivitis, weeping eyes, coughing, sneezing, etc. If we have two veterinarians state that one or more of those signs were observed (along with the description of the smell and human discomfort), we can confiscate.

Handling
◆ Licensee does not have appropriate experience to care for animals
◆ Licensee is not physically able to care for the animals any longer
◆ Licensee is observed abusing or mistreating the animals

NOTICE
It is very important to document all of the noncompliant items with photographs.

Photographs should:
◆ Accurately and clearly depict the noncompliant items, as well as the animals of concern
◆ Be accurately labeled with a description that is complete and detailed in order to prompt your memory should you be asked to testify about the inspection/confiscation years after the fact

Figure 8-30  Layers of Moist, Filthy Bedding

Source: USDA-APHIS
◆ Be taken before and during the confiscation
◆ If the issue includes the weight of the animal, try to get a good side (lateral) view, and a view of the back, either from the front or rear of the animal, or from above the animal looking down (dorsal view)

Figure 8-31 View from Front of Cougar

Figure 8-32 Side View (Lateral) of Cougar
Figure 8-33  Dorsal View of Cougar

Source: USDA-APHIS
Chronic Issues that Demonstrate a Pattern of Suffering

Veterinary Care

Veterinary care issues are a frequent source of chronic suffering for the animals inspected. These include, but are not limited to:

◆ Infectious disease processes:
  ❖ Inadequate or nonexistent treatment of minor respiratory or other disease processes that progress to a more severe infection
  ❖ Resulting from lack of ventilation, such as shipping fever, Parvovirus in puppies, distemper, and many other diseases
  ❖ Untreated wounds that become infected

◆ Trauma/Injuries
  ❖ Bumps and bruises may progress to hematomas, fluid-filled cysts, and other painful chronic injuries
  ❖ Foot or hoof foreign bodies may lead to a chronic source of suffering
  ❖ Fractures, sprains, and strains, if left untended, may become chronic sources of suffering to the affected animal
  ❖ Halters, collars, and other restraint devices that are too tight or poorly fitted that are creating injury to the animals, especially those permanently left on the animals
  ❖ Untreated skin ulcerations or sunburn

◆ Certain husbandry requirements may become veterinary care issues:
  ❖ Failure to trim hooves will cause pain and discomfort
  ❖ Sheep and certain goats, if not sheared for an extended period of time, can be in a chronic state of suffering. This is especially true in warm weather. This may also apply to long-haired breeds of dogs, cats, and other species. Coats which remain unshorn for long periods of time may be infested with maggots.
Feeding practices which may cause serious, life-threatening harm to the animals:

- A chronic insufficiency of feed
- Providing adequate amounts of food that is seriously contaminated, decomposing, maggot infested, or in some other way inedible
- Providing food that is inappropriate for the species, such as feeding dog food to any species of cat

Watering

- Inadequate water is a critical and potentially life-threatening problem that may cause chronic suffering for the animals involved
- Poor quality water may create chronic health problems, such as internal parasite loads, giardiasis, bacterial or fungal infections
- Standing water may harbor disease-carrying insects, such as mosquitoes
Shelter

- Lack of shade in bright conditions causing animals to squint or have chronic eye discomfort
- Lack of shade in hot weather, especially if animals are showing signs of discomfort, such as panting, heat stress, etc.
- Lack of shelter in cold weather, especially if animals appear to be shivering or showing other signs of discomfort from the cold

Sanitation

Examples of sanitation issues include, but are not limited to:

- Enclosures maintained so the animals cannot escape the filth (can be a combination of feces, water, mud, or other filth, such as rotted foodstuffs, creating a chronic pattern of suffering for animals trapped in such enclosures)

Figure 8-36 Guinea Pigs in Filthy Enclosure

Figure 8-37 Filth in an Animal Enclosure
Feed

- Animals being fed contaminated feed that can create chronic low grade intestinal flux
- Improperly stored feed that is unsafe for the animals or that has deteriorated to the point of being nutritionally inadequate

![Figure 8-38 Milk and Cottage Cheese in Pig Trough that is Never Cleaned](Source: USDA-APHIS)

Water

- Inadequate water to provide for good health. The animals may have marginally enough for survival, but insufficient for good health. Lack of water may cause suffering and death.

![Figure 8-39 Evidence of Inadequate Water (Dry Bucket)](Source: )
Separation
This can include physical separation, as well as visual and scent barriers.

◆ Animals that are known to be social should be housed together in compatible groups
◆ Animals isolated may become stressed from lack of an appropriate social grouping
◆ Animals of the same species should be separated if they are not compatible
◆ Animals that are constantly feeling threatened by other animals, whether in the same enclosure or from adjoining enclosures, are under constant stress and suffering. Animals may become so stressed that they die.

EXAMPLE
At one facility, there was a wallaby penned between two tigers that collapsed and died from the stress. Before it died, it spent its whole existence tucked tightly in one corner as far as it could get from the tigers. The cage bars were hardly adequate separation in this case.
Guidelines and Responsibilities for Confiscation of Animals

Recognition of Suffering by Animal Care

Animals may be found to be suffering from any condition which causes pain or distress if action is not taken to alleviate the condition. Examples of conditions which can cause suffering include, without limitation:

◆ Animals with serious medical problems that are not receiving adequate veterinary care
◆ Animals without adequate food or water
◆ Animals exposed to temperature extremes without adequate shelter or bedding
◆ Animals held in enclosures that are filthy

Animals do not need to be in jeopardy of dying to be in a state of suffering. Veterinary Medical Officers (VMO) and Animal Care Inspectors (ACI) are qualified to recognize animal suffering.

Animal Care Inspector Responsibilities

1. Promptly recognize animals suffering and initiate confiscation procedures in accordance with the regulations and resource material.
2. Involve and coordinate all on-site efforts with your SACS.
3. Clearly communicate to the authorized representative, verbally and in writing, all conditions that are causing animal suffering and the actions necessary for providing relief of that suffering. This includes writing a detailed inspection report that accompanies the Notice of Intent to Confiscate, and includes the following:
   A. Number and species of animal(s) found to be suffering and the individual identification numbers (for dogs and cats); also include the name of the animal (if verifiable), and/or a brief description of each animal, and/or the location of each animal (i.e., provide as much descriptive information as you can).
   B. Identification of deficiencies or conditions causing the suffering.
   C. Steps that must be taken to correct the problem and alleviate the suffering; e.g., examination and treatment by a qualified veterinarian.
   D. The time period in which the animal is to be given relief and adequate care. This time period must be as soon as possible after determining the animal is suffering, but typically no more than 24 hours.
   E. Current location of the premises or transport conveyance holding the affected animal.
F. A statement that the animal(s) shall not be removed from the premises or location without prior approval from Animal Care.

G. The signature of the authorized representative receiving this notification. If the authorized representative refuses to sign, the Animal Care representative must document the issuance of this notification by a sworn statement.

4. Take good photographs of conditions and animals involved. Take movies of lameness or neurologic problems, if possible.

5. Clearly communicate to the authorized representative Animal Care’s authority and intent to confiscate animals if the suffering is not relieved within the prescribed time frame, using the Notice of Intent to Confiscate form.

6. Keep the SACS informed of the situation and current on all pertinent facts and issues. This includes providing inspection reports, photographs, and other relevant documents.

7. When discussing the situation with owners, be clear about what can and cannot be agreed upon prior to the actual confiscation or voluntary relinquishing of the animals. If you are unsure about this, contact your SACS. Any agreements should be put in writing and signed by the authorized representative.

8. If the suffering animal subject to confiscation is an endangered species or a marine mammal, notify the RD, who will then ensure coordination with appropriate government agencies.

9. Should any injury or illness occur during the course of a confiscation, ensure delivery of prompt emergency care, as needed. Refer to the AC Occupational Health and Safety Manual, or contact the Collateral Duty Safety and Health Officer (CDSHO) for assistance. Also, promptly notify your SACS and/or the RD.

10. Consider weather conditions and have a tarp/canopy available for shelter, tables, chairs, and other equipment, as needed, during the actual confiscation or in the staging area.

**SACS Responsibilities**

1. Ensure all inspection resources needed for the confiscation are assigned and present.

2. Work with the assigned inspector and Regional Office to ensure that suitable location(s) for the confiscated animal(s) are lined up.

3. On site responsibility for:
   A. Operational decisions involving the confiscation
   B. Ensure inspectors conduct themselves professionally
C. Address any media situations

D. Ensure good communication and coordination with State or local officials with animal welfare responsibility at the facility

4. Make sure cell phone is functional to answer calls from the Regional Office, as well as to keep the Regional Office regularly apprised of the status of the confiscation.

5. Based on what is happening at the facility, notify the Regional Office of any on site concerns and/or changes in procedures.

Regional Director Responsibilities

1. Promptly notify the Deputy Administrator (DA) and the Administrator's Office that confiscation procedures have, or will be, initiated.

2. If it is deemed necessary, obtain the opinion of a second Animal Care VMO or a private veterinarian with appropriate expertise with the species involved.

3. Request assistance and coordinate confiscation procedures with the IES Regional Director (IESRD).

4. Contact Ken Vail to have an OGC attorney assigned to the confiscation for legal guidance.

5. Arrange for appropriate transportation of confiscated animal(s), including trained animal handlers, if needed.

6. Ensure Legislative and Public Affairs (LPA) has all necessary information, and is on board to provide media assistance, if needed.

7. Ensure the availability and/or presence of a veterinarian knowledgeable in the species involved.

8. Provide the DA and the Administrator’s Office with the most current information, to include a summary email or memo listing the number and species of animals to be confiscated, the location of the animals, and the reason(s) for the confiscation action. Digital photographs of the animals and conditions should be included.

9. Advise the DA if the suffering animal subject to confiscation is an endangered species or a marine mammal, so that coordination with the appropriate government agencies can be initiated.

10. Coordinate all proposed legal actions (subpoenas, etc.) with the IES RD, and ensure through the assigned OGC attorney that said actions are legal and/or legally supportable.

11. Notify LPA and provide information for the press releases and arrange media assistance on site, if indicated. This may be especially important if animals will be euthanized.
12. Document anticipated expensed in advance, and send written estimates of costs for products or services to AC Headquarters.

13. When working with animals with contagious diseases, e.g., dogs infected with or exposed to brucellosis, establish a plan to deal with the disease. Determine APHIS’ financial responsibility to test or treat any infected or exposed animals, or humans, if the disease is zoonotic.

14. Consider a temporary staging area to triage process large numbers of animals.

15. Promptly review and forward the IES investigative report to the IES Headquarters’ staff.

**Security**

Confiscation involves Federal officials (USDA) entering and seizing the property (animals) of regulated members of the public. It can quickly turn into a violent situation. The USDA must have adequate law enforcement present at every confiscation. If there is inadequate law enforcement, the USDA cannot continue with the confiscation. If law enforcement is present but needs to leave before the operation is completed, the USDA must also leave.

The Security Branch of Emergency Management Safety and Security Division (EMSSD-SB) is responsible for coordinating security for confiscations. Typically, the RD or ARD will initiate contact with EMSSD-SB, but that initial contact can also be made by a SACS or member of AC’s Program Response Team. EMSSD-SB can also delegate security to another person at the confiscation site.

Investigative Enforcement Services (IES) is the Agency’s liaison with the Office of Inspector General (OIG). There may be times during a confiscation operation when IES needs to involve OIG in the acquisition or service of a subpoena or warrant. If at any point during the confiscation, OIG will have some or all responsibility for the safety of AC employees, the point person for communication with the OIG agents immediately becomes EMSSD-SB.

In cases where dangerous or potentially dangerous animals are involved, the law enforcement personnel on site must have weapons that are capable of bringing down the animals on site, should an escape happen. Wildlife Services has expertise with determining the appropriate weaponry for various species of animals.

Coordinate a pre-confiscation logistics meeting the day before the confiscation in order to ensure that all members of the confiscation team (AC, IES, EMSSD, law enforcement) understand the security plans and expectations before anyone goes on site.
Confiscation Information
Guidelines and Responsibilities for Confiscation of Animals

Confiscation Timeliness
If the licensee states that he/she cannot, or will not correct the non-compliances causing the suffering, we will immediately confiscate the animals. Insufficient and/or incomplete corrections will also result in immediate confiscation. On the Notice of Intent to Confiscate, correction deadlines should never be more than 24 hours, but typically should be before the end of the day.

Authorized Representative is Unavailable
When the AC and IES representatives have reason to believe that an animal is suffering and the authorized representative for the animal cannot be found after a reasonable time (24 hours or less), the EMSSD-SB shall contact local law enforcement for assistance, and the AC veterinarian shall contact a qualified private veterinarian to accompany them to the premises. The veterinarian and the AC representative shall determine whether or not the animal is suffering, diagnose the problem and probable cause, and document the finding and recommendations in writing. The AC representative shall ensure that adequate care is provided to the animal. If the condition of the animal cannot be corrected by this temporary care, the AC representative shall confiscate the animal in accordance with this policy.
TO:

FROM:

DATE:

SUBJECT: Notice of Intent to Confiscate Animals

PLEASE TAKE NOTICE

THEREFORE, the U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS) requires that these conditions be corrected immediately and that adequate care be given to alleviate the animals’ suffering as directed in the attached inspection report. In the event you fail or refuse to comply with this request by 8:00 A.M. on May 27, 2010, APHIS may confiscate the animals, pursuant to section 16 of the Animal Welfare Act (7 U.S.C. 2146) and Title 9, Code of Federal Regulations, Section 2.129 (9 C.F.R. 2.129).

Should you need further information, you may contact me at 919-855-7100.

Animal Care
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

___________________________
Administrator
Animal Care Regional Director

Received By: __________________________  Date:________________
Title: __________________________

9.5.47
TO:

FROM: Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

DATE: ________________________

SUBJECT: Notice of Confiscation of Animals

PLEASE TAKE NOTICE that the following animals

Are hereby confiscated by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service, pursuant to section 16 of the Animal Welfare Act (7 U.S.C. 2146) and Title 9, Code of Federal Regulations, section 2.129 (9 C.F.R. 2.129), for the failure to provide the adequate and necessary care to an animal.

________________________________________
Administrator
Animal and Plant Health Inspection Service
U.S. Department of Agriculture

Figure 8-41 Notice of Confiscation of Animals
Appendix A—Forms and Worksheets

Contents

APHIS Form 7002—Program of Veterinary Care for Research Facilities or Exhibitors/Dealers A-2
APHIS Form 7003A—Application for New License A-6
APHIS Form 7003—Application for License Renewal A-7
APHIS Form 7005—Record of Acquisition of Dogs and Cats on Hand A-8
APHIS Form 7006—Record of Disposition of Dogs and Cats A-10
APHIS Form 7006A—Continuation Sheet for Record of Disposition of Dogs and Cats A-12
APHIS Form 7011—Application for Registration Update A-13
APHIS Form 7011A—Application for New Registration A-14
APHIS Form 7019—Record of Animals on Hand (Other than Dogs and Cats) A-15
APHIS Form 7020—Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats) A-16
APHIS Form 7020A—Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals (Other than Dogs and Cats) A-17
APHIS Form 7023—Annual Report of Research Facility A-18
USDA, APHIS, Animal Care Animal Welfare Complaint Sheet (For APHIS Internal Use Only) A-19
USDA, APHIS, Animal Care Search for Unlicensed Activity Worksheet (For APHIS Internal Use Only) A-20
USDA Examples of Personally Identifiable Information (PII) A-21
Amended Report Letter A-23
Environmental Enrichment Plan Inspection Checklist A-24
Handling of Dangerous Animals Letter A-26
Inspection Report Review Checklist A-28
Options for Identification of Dogs and Cats A-30
Perimeter Fence Variance Request Letter A-31
State and Territory Identification Codes A-33
Teachable Moments Review Checklist A-34

The USDA APHIS forms in this Appendix are only to be used as examples. Do not reproduce and use these forms in an official capacity. Use only the official approved Office of Management and Budget (OMB) form or the USDA APHIS Animal Care program worksheets.
Appendix A—Forms and Worksheets
APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers

APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control numbers for these information collections are 0579-0036 and 0579-0093. The time required to complete these information collections is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

The Animal Welfare Regulations, Title 9, Subchapter A, Part II, Subpart C, Section 2.33 and Subpart D, Section 2.40 require a Program of Veterinary Care.

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

ANIMAL CARE
(Program of Veterinary Care for Research Facilities or Exhibitors/Dealers)

SECTION I. A PROGRAM OF VETERINARY CARE (PVC) HAS BEEN ESTABLISHED BETWEEN:

A. LICENSEE/REGISTRANT

1. NAME:

2. BUSINESS NAME:

3. USDA LICENSE/REGISTRATION NUMBER:

4. MAILING ADDRESS:

5. CITY, STATE, AND ZIP CODE:

6. TELEPHONE NUMBER (Home):

B. VETERINARIAN

1. NAME:

2. CLINIC NAME:

3. STATE LICENSE NUMBER:

4. BUSINESS ADDRESS:

5. CITY, STATE, AND ZIP CODE:

6. TELEPHONE NUMBER (Business):

This is a form that may be used for the Program of Veterinary Care. Also, this form may be used as a guideline for the written Program of Veterinary Care, as required.

The attending veterinarian shall establish, maintain, and supervise programs of disease control and prevention, pest and parasite control, pre-procedural and post-procedural care, nutrition, euthanasia, and adequate veterinary care for all animals on the premises of the licensee/registrant. A written program of adequate veterinary care between the licensee/registrant and the doctor of veterinary medicine shall be established and reviewed on an annual basis. By law, such programs must include regularly scheduled visits to the premises by the veterinarian. Scheduled visits are required to monitor animal health and husbandry.

Pages or blocks which do not apply to the facility should be marked N/A. If the space provided is not adequate for a specific topic, additional sheets may be added. Please indicate Section and Item Number.

I have read and completed this Program of Veterinary Care, and understand my responsibilities.

Regularly scheduled visits by the veterinarian will occur at the following frequency:

_________________________________________________ (minimum annual).

C. SIGNATURE OF LICENSEE/REGISTRANT:  DATE:

D. SIGNATURE OF VETERINARIAN:  DATE:

APHIS 7002                           Page 1 of 4
JUN 2011

Figure A-1  APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers
(1 of 4)
### SECTION II. DOGS AND CATS

#### A. VACCINATIONS – SPECIFY THE FREQUENCY OF VACCINATION FOR THE FOLLOWING DISEASES:

<table>
<thead>
<tr>
<th>Disease</th>
<th>Canine</th>
<th>Feline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canine Parvovirus</td>
<td>Juvenile</td>
<td>Adult</td>
</tr>
<tr>
<td>Feline Parvovirus</td>
<td>Juvenile</td>
<td>Adult</td>
</tr>
<tr>
<td>Distemper</td>
<td></td>
<td>Resp. Viruses</td>
</tr>
<tr>
<td>Hepatitis</td>
<td></td>
<td>Rabies</td>
</tr>
<tr>
<td>Leptospirosis</td>
<td></td>
<td>Other (Specify)</td>
</tr>
<tr>
<td>Rabies</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bordetella</td>
<td></td>
<td>Other (Specify)</td>
</tr>
</tbody>
</table>

#### B. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:

1. Ectoparasites (Fleas, Ticks, Mites, Lice, Flies):

2. Blood Parasites (Heartworm, Babesia, Ehrlichia, Other):

3. Intestinal Parasites (Fecals, Deworming):

#### C. EMERGENCY CARE – DESCRIBE PROVISIONS FOR EMERGENCY, WEEKEND, AND HOLIDAY CARE:

#### D. EUTHANASIA

1. Sick, diseased, injured, or lame animals shall be provided with veterinary care or euthanized. Euthanasia will be in accordance with the AVMA recommendations and will be carried out by the following:
   - Veterinarian
   - Licensee/Registrant

2. Method(s) of euthanasia:

#### E. ADDITIONAL PROGRAM TOPICS – THE FOLLOWING TOPICS HAVE BEEN DISCUSSED IN THE FORMULATION OF THE PROGRAM OF VETERINARY CARE:

- Congenital Conditions
- Exercise Plan (Dogs)
- Quarantine Conditions
- Proper Handling of Biologics
- Nutrition
- Venereal Diseases
- Anthelminthic Alternation
- Pest Control and Product Safety
- Other (Specify)
- Proper Use of Analgesics and Sedatives

**Figure A-2 APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers (2 of 4)**
### SECTION III. WILD AND EXOTIC ANIMALS

#### A. VACCINATIONS
- **CARNIVORES:**
- **HOOFED STOCK:**
- **PRIMATES:**
- **ELEPHANTS:**
- **MARINE MAMMALS:**
- **OTHER (Specify):**

**CHECK IF N/A [ ]**

#### B. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:
1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):
2. BLOOD PARASITES:
3. INTESTINAL PARASITES:

#### C. EMERGENCY CARE
1. DESCRIBE PROVISIONS FOR EMERGENCY, WEEKEND, AND HOLIDAY CARE:
2. DESCRIBE CAPTURE AND RESTRAINT METHOD(S):

#### D. EUTHANASIA
1. SICK, DISEASED, INJURED, OR LAME ANIMALS SHALL BE PROVIDED WITH VETERINARY CARE OR EUTHANIZED. EUTHANASIA WILL BE IN ACCORDANCE WITH THE AVMA RECOMMENDATIONS AND WILL BE CARRIED OUT BY THE FOLLOWING:
   - [ ] VETERINARIAN
   - [ ] LICENSEE/REGISTRANT
2. METHOD(S) OF EUTHANASIA:

#### E. ADDITIONAL PROGRAM TOPICS – THE FOLLOWING TOPICS HAVE BEEN DISCUSSED IN THE FORMULATION OF THE PROGRAM OF VETERINARY CARE:
- [ ] Pest Control and Product Safety
- [ ] Environment Enhancement (Primates)
- [ ] Quarantine Procedures
- [ ] Water Quality (Marine Mammals)
- [ ] Zoonoses
- [ ] Species-specific Behaviors
- [ ] Other (Specify)
- [ ] Proper Storage and Handling of Drugs and Biologics
- [ ] Proper Use of Analgesics and Sedatives

#### F. LIST THE SPECIES SUBJECTED TO TB TESTING, AND THE FREQUENCY OF SUCH TESTS:
SECTION IV. OTHER WARMBLOODED ANIMALS

A. INDICATE SPECIES:

B. VACCINATIONS – LIST THE DISEASES FOR WHICH VACCINATIONS ARE PERFORMED AND THE FREQUENCY OF VACCINATIONS
(Enter N/A if not applicable):

C. PARASITE CONTROL PROGRAM – DESCRIBE THE FREQUENCY OF SAMPLING OR TREATMENT FOR THE FOLLOWING:
1. ECTOPARASITES (Fleas, Ticks, Mites, Lice, Flies):

2. INTERNAL PARASITES (Helminths, Coccidia, Other):

D. EMERGENCY CARE – DESCRIBE PROVISIONS FOR EMERGENCY, WEEKEND, AND HOLIDAY CARE:

E. EUTHANASIA
1. SICK, DISEASED, INJURED, OR LAME ANIMALS SHALL BE PROVIDED WITH VETERINARY CARE OR EUTHANIZED. EUTHANASIA WILL BE IN ACCORDANCE WITH THE AVMA RECOMMENDATIONS AND WILL BE CARRIED OUT BY THE FOLLOWING:
   - VETERINARIAN
   - LICENSEE/REGISTRANT

2. METHOD(S) OF EUTHANASIA:

F. ADDITIONAL PROGRAM TOPICS – THE FOLLOWING TOPICS HAVE BEEN DISCUSSED IN THE FORMULATION OF THE PROGRAM OF VETERINARY CARE:
   - Pasteurellosis
   - Pododermatitis
   - Cannibalism
   - Wet Tail
   - Other (Specify):

Figure A-4  APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers (4 of 4)
APHIS Form 7003A–Application for New License

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average .25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

United States Department of Agriculture
Animal and Plant Health Inspection Service

APPLICATION FOR LICENSE
(TYPE OR PRINT)

NEW LICENSE

1. NAME OF APPLICANT AND MAILING ADDRESS: (See Instructions)
2. ALL BUSINESS NAMES AND LOCATION ADDRESSES HOUSING ANIMALS: INCLUDE DIRECTIONS TO EACH LOCATION (P.O. Box not acceptable)

COUNTY: TELEPHONE NUMBER:
COUNTY: TELEPHONE NUMBER:

3. IF THE APPLICANT IS A CORPORATION, PARTNERSHIP OR OTHER BUSINESS ENTITY, LIST THE ENTITY'S PARTNERS OR OFFICERS AND AGENT FOR SERVICE OF PROCESS.

4. (A) PREVIOUS USDA LICENSE NUMBER: (If any)
   (B) ACTIVE USDA LICENSE NUMBER IN WHICH YOU HAVE AN INTEREST:

5. TYPE OF LICENSE:
   Class A – Breeder
   Class B – Dealer
   Class C – Exhibitor

6. LIST YOUR 12 MONTH BUSINESS YEAR: (Calendar or Fiscal)

7. TYPE OF ORGANIZATION:
   Individual
   Corporation
   Partnership
   Other

8. DEALERS ONLY - CLASS A OR CLASS B LICENSES MUST COMPLETE THIS BLOCK

9. EXHIBITORS ONLY - LIST THE LARGEST NUMBER OF ANIMALS THAT YOU HAVE HELD, OWNED, LEASED, OR EXHIBITED AT ANY ONE TIME DURING THE PREVIOUS BUSINESS YEAR

10. SIGNATURE: 11. PRINT NAME AND TITLE: 12. DATE:

CERTIFICATION
I hereby make application for a license under the Animal Welfare Act 7 U.S.C. 2131 et seq., I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and agree to comply with all the regulations and standards in 9 CFR, Subpart A, Parts 1, 2, and 3. I certify that the applicant is 18 years of age or older.

APHIS FORM 7003A
AUG 2011

(Previous editions are obsolete)

Figure A-5  APHIS Form 7003A–Application for New License
Appendix A—Forms and Worksheets
APHIS Form 7003—Application for License Renewal

Figure A-6  APHIS Form 7003—Application for License Renewal
## APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0579-0036. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information.

**UNITED STATES DEPARTMENT OF AGRICULTURE**

**ANIMAL AND PLANT HEALTH INSPECTION SERVICE**

**RECORD OF ACQUISITION OF DOGS AND CATS ON HAND**

This record is required by law (7 U.S.C. 2131-2156). (9 CFR, Subchapter A, Parts 1, 2, and 3). Failure to maintain this record can result in a suspension or revocation of license and/or imprisonment for not more than 1 year, or a fine of not more than $1,000, or both.

### 1. RECORD FOR (*)
- **USDA LICENSE OR REGISTRATION NUMBER**
- **NAME AND ADDRESS OF LICENSEE, REGISTRANT, OR HOLDING FACILITY**
- **BUSINESS YEAR**
- **PAGE NUMBER**

<table>
<thead>
<tr>
<th>B.</th>
<th>C.</th>
<th>D.</th>
<th>E.</th>
<th>F.</th>
<th>G.</th>
<th>H.</th>
<th>I.</th>
<th>J.</th>
</tr>
</thead>
<tbody>
<tr>
<td>TATTOO OR USDA TAG NUMBER</td>
<td>DOG</td>
<td>CAT</td>
<td>AGE OR DATE OF BIRTH</td>
<td>BREED OR TYPE: (If mixed breed, list 2 dominant breeds)</td>
<td>DESCRIPTION OF ANIMAL (Color, distinctive marks, hair, tail, tattoos, etc)</td>
<td>DATE ACQUIRED</td>
<td>NAME AND ADDRESS, USDA LICENSE OR REGISTRATION NUMBER, OR DRIVER’S LICENSE NUMBER AND STATE, VEHICLE LICENSE NUMBER AND STATE</td>
<td>Date Removed or Sold</td>
</tr>
<tr>
<td>M</td>
<td>F</td>
<td>M</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M</td>
<td>F</td>
<td>M</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M</td>
<td>F</td>
<td>M</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M</td>
<td>F</td>
<td>M</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M</td>
<td>F</td>
<td>M</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M</td>
<td>F</td>
<td>M</td>
<td>F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### APHIS 7005

**JUL 2009**

**INSPECTOR USE ONLY**

**LAST INSPECTION (date)**

**TOTAL NUMBER ANIMALS ENTERED SINCE LAST INSPECTION**

**COUNT TOTAL NUMBER ANIMALS ACTUALLY ON PREMISES**

**DATE**

**INMATES**

Previous edition may be used. Replaces VS 18-5 which may be used.

---

**Figure A-7 APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand (front)**

A-8 Animal Welfare Inspection Guide 06/2017
## BREED ABBREVIATIONS – DOGS (Column F)

<table>
<thead>
<tr>
<th>Breed</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Afghan Hound</td>
<td>AH</td>
</tr>
<tr>
<td>Airedale Terrier</td>
<td>AD</td>
</tr>
<tr>
<td>American Bull Terrier</td>
<td>AB</td>
</tr>
<tr>
<td>Boxer</td>
<td>BS</td>
</tr>
<tr>
<td>Basset Hound</td>
<td>BH</td>
</tr>
<tr>
<td>Beagle</td>
<td>BE</td>
</tr>
<tr>
<td>Bedlington Terrier</td>
<td>BL</td>
</tr>
<tr>
<td>Bichon Frise</td>
<td>BF</td>
</tr>
<tr>
<td>Black and Tan</td>
<td>BT</td>
</tr>
<tr>
<td>Coonhound</td>
<td>BS</td>
</tr>
<tr>
<td>Bluetick</td>
<td>BK</td>
</tr>
<tr>
<td>Boston Terrier</td>
<td>BO</td>
</tr>
<tr>
<td>Boxer</td>
<td>BX</td>
</tr>
<tr>
<td>Bullmastiff</td>
<td>BM</td>
</tr>
<tr>
<td>Cairn Terrier</td>
<td>CT</td>
</tr>
<tr>
<td>Catahoula</td>
<td>CJ</td>
</tr>
<tr>
<td>Chihuahua</td>
<td>CA</td>
</tr>
<tr>
<td>Chinese Crested Dog</td>
<td>CD</td>
</tr>
<tr>
<td>Chow-Chow</td>
<td>CC</td>
</tr>
<tr>
<td>Cocker Spaniel</td>
<td>CK</td>
</tr>
<tr>
<td>Collie</td>
<td>CL</td>
</tr>
<tr>
<td>Coonhound (Specify)</td>
<td>CH</td>
</tr>
<tr>
<td>Dachshund</td>
<td>DH</td>
</tr>
<tr>
<td>Dalmatian</td>
<td>DL</td>
</tr>
<tr>
<td>Doberman</td>
<td>DB</td>
</tr>
<tr>
<td>Dhole</td>
<td>DH</td>
</tr>
<tr>
<td>English Bulldog</td>
<td>EB</td>
</tr>
<tr>
<td>Eskimo Dog</td>
<td>ED</td>
</tr>
<tr>
<td>Foxhound</td>
<td>FH</td>
</tr>
<tr>
<td>Fox Terrier</td>
<td>FT</td>
</tr>
<tr>
<td>French Bulldog</td>
<td>FB</td>
</tr>
<tr>
<td>German Shepherd</td>
<td>GS</td>
</tr>
<tr>
<td>German Short Haired</td>
<td>SH</td>
</tr>
<tr>
<td>Golden Retriever</td>
<td>GR</td>
</tr>
<tr>
<td>Gordon Setter</td>
<td>GO</td>
</tr>
<tr>
<td>Great Dane</td>
<td>GD</td>
</tr>
<tr>
<td>Great Pyrenees</td>
<td>GP</td>
</tr>
<tr>
<td>Greyhound</td>
<td>GH</td>
</tr>
<tr>
<td>Husky</td>
<td>HK</td>
</tr>
<tr>
<td>Irish Setter</td>
<td>IS</td>
</tr>
<tr>
<td>Jack Russell Terrier</td>
<td>JR</td>
</tr>
<tr>
<td>Keeshond</td>
<td>KH</td>
</tr>
<tr>
<td>King Charles Spaniel</td>
<td>KC</td>
</tr>
<tr>
<td>Komondor</td>
<td>KM</td>
</tr>
<tr>
<td>Labrador Retriever</td>
<td>LR</td>
</tr>
<tr>
<td>Malamute</td>
<td>MA</td>
</tr>
<tr>
<td>Maltese</td>
<td>MT</td>
</tr>
<tr>
<td>Min Pincher</td>
<td>MP</td>
</tr>
<tr>
<td>Pekingese</td>
<td>PK</td>
</tr>
<tr>
<td>Pomeranian</td>
<td>PM</td>
</tr>
<tr>
<td>Poodle</td>
<td>PO</td>
</tr>
<tr>
<td>Pointer</td>
<td>PU</td>
</tr>
<tr>
<td>Redbone Coonhound</td>
<td>RB</td>
</tr>
<tr>
<td>Rex</td>
<td>RE</td>
</tr>
<tr>
<td>Saint Bernard</td>
<td>SB</td>
</tr>
<tr>
<td>Samoyed</td>
<td>SM</td>
</tr>
<tr>
<td>Shihtzu</td>
<td>SI</td>
</tr>
<tr>
<td>Silky Terrier</td>
<td>SJ</td>
</tr>
<tr>
<td>Spitz</td>
<td>SZ</td>
</tr>
<tr>
<td>Springer Spaniel</td>
<td>SR</td>
</tr>
<tr>
<td>Staffordshire Bull</td>
<td>ST</td>
</tr>
<tr>
<td>Terrier</td>
<td>TR</td>
</tr>
<tr>
<td>Welsh Corgi</td>
<td>WC</td>
</tr>
<tr>
<td>Whippet</td>
<td>WH</td>
</tr>
<tr>
<td>Yorkshire Terrier</td>
<td>YT</td>
</tr>
<tr>
<td>Other (Specify)</td>
<td>O</td>
</tr>
</tbody>
</table>

## BREED ABBREVIATIONS – CATS (Column F)

<table>
<thead>
<tr>
<th>Breed</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abyssinian</td>
<td>AB</td>
</tr>
<tr>
<td>Burmese</td>
<td>BU</td>
</tr>
<tr>
<td>Domestic Long Hair</td>
<td>DL</td>
</tr>
<tr>
<td>Domestic Short Hair</td>
<td>DS</td>
</tr>
<tr>
<td>Himalayan</td>
<td>HM</td>
</tr>
<tr>
<td>Maine Coon</td>
<td>MC</td>
</tr>
<tr>
<td>Manx</td>
<td>MX</td>
</tr>
<tr>
<td>Persian</td>
<td>PR</td>
</tr>
<tr>
<td>Russian Blue</td>
<td>RB</td>
</tr>
<tr>
<td>Rex</td>
<td>RE</td>
</tr>
<tr>
<td>Siamese</td>
<td>SI</td>
</tr>
<tr>
<td>Other (Specify)</td>
<td>O</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TYPE</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hound Crossbreed</td>
<td>HX</td>
</tr>
<tr>
<td>Terrier Crossbreed</td>
<td>TX</td>
</tr>
<tr>
<td>Shepherd Crossbreed</td>
<td>SX</td>
</tr>
<tr>
<td>Spaniel Crossbreed</td>
<td>PX</td>
</tr>
</tbody>
</table>

---

Figure A-8 APHIS Form 7005—Record of Acquisition of Dogs and Cats on Hand (reverse)
Appendix A—Forms and Worksheets
APHIS Form 7006—Record of Disposition of Dogs and Cats

APHIS Form 7006—Record of Disposition of Dogs and Cats

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0575-0036. The time required to complete this information collection is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the information collection.

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE

RECORD OF DISPOSITION OF DOGS AND CATS

☐ SALE ☐ EXCHANGE OR TRANSFER ☐ DONATION

1. DATE OF DISPOSITION

This record is required by law (7 U.S.C. 2131–2156) (9 CFR Subchapter A, Parts 1, 2, and 3). Failure to maintain this record can result in a suspension or revocation of license and/or enforcement for not more than 1 year, or a fine of not more than $1,250, or both.

INSTRUCTIONS: Complete applicable items 1 through 8. Original and USDA Copy to be retained by seller. Buyer’s Copy to accompany shipment. It must be retained by buyer.

3. SELLER OR DONOR (Name and Address)

4. BUYER OR RECEIVER (Name and Address)

3A. DEALER’S LICENSE NUMBER OR RESEARCH FACILITY REGISTRATION NUMBER (Sellers)

4A. USDA LICENSE NUMBER OR RESEARCH FACILITY REGISTRATION NUMBER (If Any)

5. IDENTIFICATION OF EACH ANIMAL BEING DELIVERED (See reverse for Breed Abbreviations and Dogs and Cats) * If mixed breed, list 2 dominant breeds

A. COMPLETE ITEMS A THROUGH G FOR EACH ANIMAL

<table>
<thead>
<tr>
<th>IDENTIFICATION NUMBER</th>
<th>B. DOG</th>
<th>C. CAT</th>
<th>D. AGE OR DATE OF BIRTH</th>
<th>E. WEIGHT</th>
<th>F. BREED OR TYPE</th>
<th>G. DESCRIPTION OF ANIMAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>M F M F M F</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

6. DELIVERY BY (check one and complete applicable items 7 and 8)

☐ COMMERCIAL SHIPPER ☐ BUYER’S VEHICLE ☐ SELLER’S VEHICLE

7. NAME AND ADDRESS OF COMPANY OR FIRM (Include ZIP Code)

8. NAME AND ADDRESS OF TRUCK DRIVER (Include ZIP Code)

9. RECEIVED BY

10. SIGNATURE

11. TITLE

12. DATE

APHIS 7006
JUL. 2009

(Previous edition may be used.)

BUYER’S COPY - To accompany shipment and be retained by buyer

Figure A-9 APHIS Form 7006—Record of Disposition of Dogs and Cats (front)
### BREED ABBREVIATIONS – DOGS (Column F)

<table>
<thead>
<tr>
<th>Breed</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Afghan Hound</td>
<td>AH</td>
</tr>
<tr>
<td>Airedale Terrier</td>
<td>AD</td>
</tr>
<tr>
<td>Akita</td>
<td>AK</td>
</tr>
<tr>
<td>American Bull Terrier</td>
<td>AB</td>
</tr>
<tr>
<td>Rottweiler</td>
<td>BS</td>
</tr>
<tr>
<td>Bassett Hound</td>
<td>BH</td>
</tr>
<tr>
<td>Beagle</td>
<td>BE</td>
</tr>
<tr>
<td>Brittany Spaniel</td>
<td>BL</td>
</tr>
<tr>
<td>Boxer</td>
<td>BX</td>
</tr>
<tr>
<td>Bullmastiff</td>
<td>BM</td>
</tr>
<tr>
<td>Cairn Terrier</td>
<td>CT</td>
</tr>
<tr>
<td>Cattle Dog</td>
<td>CA</td>
</tr>
<tr>
<td>Chinese Crested Dog</td>
<td>CD</td>
</tr>
<tr>
<td>Chow-Chow</td>
<td>CC</td>
</tr>
<tr>
<td>Cocker Spaniel</td>
<td>CK</td>
</tr>
<tr>
<td>Coonhound (Specify)</td>
<td>CL</td>
</tr>
<tr>
<td>Dachshund</td>
<td>DH</td>
</tr>
<tr>
<td>Dalmatian</td>
<td>DL</td>
</tr>
<tr>
<td>Doberman</td>
<td>DS</td>
</tr>
<tr>
<td>Elk</td>
<td>DC</td>
</tr>
<tr>
<td>English Bulldog</td>
<td>ED</td>
</tr>
<tr>
<td>English Setter</td>
<td>ES</td>
</tr>
<tr>
<td>Eskimo Dog</td>
<td>ED</td>
</tr>
<tr>
<td>Foxhound</td>
<td>FH</td>
</tr>
<tr>
<td>Fox Terrier</td>
<td>FT</td>
</tr>
<tr>
<td>French Bulldog</td>
<td>FB</td>
</tr>
<tr>
<td>German Shepherd</td>
<td>GS</td>
</tr>
<tr>
<td>German Short Haired Pointer</td>
<td>SH</td>
</tr>
<tr>
<td>Gordon Setter</td>
<td>GR</td>
</tr>
<tr>
<td>Great Dane</td>
<td>GO</td>
</tr>
<tr>
<td>Greyhound</td>
<td>GD</td>
</tr>
<tr>
<td>Husky</td>
<td>GH</td>
</tr>
<tr>
<td>Irish Setter</td>
<td>GI</td>
</tr>
<tr>
<td>Jack Russell Terrier</td>
<td>GI</td>
</tr>
<tr>
<td>Keeshond</td>
<td>GS</td>
</tr>
<tr>
<td>King Charles Spaniel</td>
<td>GN</td>
</tr>
<tr>
<td>Komondor</td>
<td>GP</td>
</tr>
<tr>
<td>Labrador Retriever</td>
<td>GP</td>
</tr>
<tr>
<td>Lhasa Apso</td>
<td>GR</td>
</tr>
<tr>
<td>Malaysian</td>
<td>GT</td>
</tr>
<tr>
<td>Mastiff</td>
<td>GT</td>
</tr>
<tr>
<td>Miniature Pinscher</td>
<td>GH</td>
</tr>
<tr>
<td>Newfoundland</td>
<td>HF</td>
</tr>
<tr>
<td>Old English Sheepdog</td>
<td>HG</td>
</tr>
<tr>
<td>Pekingese</td>
<td>HM</td>
</tr>
<tr>
<td>Pomeranian</td>
<td>HP</td>
</tr>
<tr>
<td>Poodle</td>
<td>HN</td>
</tr>
<tr>
<td>Pug</td>
<td>HS</td>
</tr>
<tr>
<td>Redbone Coonhound</td>
<td>HT</td>
</tr>
<tr>
<td>Rhodesian Ridgeback</td>
<td>HS</td>
</tr>
<tr>
<td>Saint Bernard</td>
<td>HS</td>
</tr>
<tr>
<td>Samoyed</td>
<td>HS</td>
</tr>
<tr>
<td>Schnauzer</td>
<td>HS</td>
</tr>
<tr>
<td>Sheltie</td>
<td>HS</td>
</tr>
<tr>
<td>Shih-tzu</td>
<td>HS</td>
</tr>
<tr>
<td>Silky Terrier</td>
<td>HS</td>
</tr>
<tr>
<td>Spitz</td>
<td>HS</td>
</tr>
<tr>
<td>Springer Spaniel</td>
<td>HS</td>
</tr>
<tr>
<td>Staffordshire Bull Terrier</td>
<td>HS</td>
</tr>
<tr>
<td>Walker</td>
<td>HS</td>
</tr>
<tr>
<td>Welsh Corgi</td>
<td>HS</td>
</tr>
<tr>
<td>Whippet</td>
<td>HS</td>
</tr>
<tr>
<td>Yorkshire Terrier</td>
<td>HS</td>
</tr>
</tbody>
</table>

### BREED ABBREVIATIONS – CATS (Column F)

<table>
<thead>
<tr>
<th>Breed</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abyssinian</td>
<td>AB</td>
</tr>
<tr>
<td>Burmese</td>
<td>BU</td>
</tr>
<tr>
<td>Domestic Long Hair</td>
<td>DL</td>
</tr>
<tr>
<td>Domestic Short Hair</td>
<td>DS</td>
</tr>
<tr>
<td>Himalayan</td>
<td>DM</td>
</tr>
<tr>
<td>Maine Coon</td>
<td>MC</td>
</tr>
<tr>
<td>Manx</td>
<td>MX</td>
</tr>
<tr>
<td>Persian</td>
<td>PP</td>
</tr>
<tr>
<td>Russian Blue</td>
<td>RB</td>
</tr>
<tr>
<td>Rex</td>
<td>RE</td>
</tr>
<tr>
<td>Siamese</td>
<td>SI</td>
</tr>
</tbody>
</table>

### TYPE (Column F)

<table>
<thead>
<tr>
<th>Type</th>
<th>Abbreviation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hound Crossbreed</td>
<td>HX</td>
</tr>
<tr>
<td>Terrier Crossbreed</td>
<td>TX</td>
</tr>
<tr>
<td>Shepherd Crossbreed</td>
<td>SX</td>
</tr>
<tr>
<td>Spaniel Crossbreed</td>
<td>PX</td>
</tr>
</tbody>
</table>

---

Figure A-10  APHIS Form 7006–Record of Disposition of Dogs and Cats (reverse)
### APHIS Form 7006A–Continuation Sheet for Record of Disposition of Dogs and Cats

This record is required by law (7 U.S.C. 2131-2135a) (9 CFR, Subchapter A, Parts 1, 2 and 3). Failure to maintain this record can result in a suspension or revocation of license and/or imprisonment for not more than 1 year, or a fine of not more than $1,000, or both.

<table>
<thead>
<tr>
<th>Form Approved (OMB No.)</th>
<th>Date Approved</th>
<th>Date Revised</th>
</tr>
</thead>
<tbody>
<tr>
<td>0579-0036</td>
<td>06/2017</td>
<td>06/2017</td>
</tr>
</tbody>
</table>

#### U.S. DEPARTMENT OF AGRICULTURE
**ANIMAL AND PLANT HEALTH INSPECTION SERVICE**

**CONTINUATION SHEET FOR RECORD OF DISPOSITION OF DOGS AND CATS**

<table>
<thead>
<tr>
<th>☐ SALE</th>
<th>☐ EXCHANGE OR TRANSFER</th>
<th>☐ DONATION</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1. DATE OF DISPOSSESSION</th>
<th>2. PAGE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>3. SELLER OR DONOR (Name &amp; Address)</th>
<th>4. BUYER OR RECEIVER (Name)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>5. IDENTIFICATION OF ANIMALS BEING DELIVERED</th>
<th>COMPLETE ITEMS A THRU G FOR EACH ANIMAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>* If mixed breed, list 2 dominant breeds</td>
<td></td>
</tr>
</tbody>
</table>

**ID NUMBER**

<table>
<thead>
<tr>
<th>DOG</th>
<th>CAT</th>
<th>AGE OR DATE OF BIRTH</th>
<th>WT</th>
<th>BREEF OR TYPE</th>
<th>DESCRIPTION OF ANIMAL</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>(Color, Distinctive Marks, Hair, Tail, tattoos, etc.)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
<th>F</th>
<th>G</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

APHIS FORM 7006A (JUN 95) (Previous edition may be used)

ORIGINAL - Seller's Record

---

Figure A-11 APHIS Form 7006A–Continuation Sheet for Record of Disposition of Dogs and Cats
## APHIS Form 7011—Application for Registration Update

**Application for Registration**

<table>
<thead>
<tr>
<th>Certificate No./Cust No.</th>
<th>Renewal Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>REGISTRANT (Name and permanent mailing address, including Zip Code)</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>COUNTY</td>
<td>TELEPHONE</td>
</tr>
<tr>
<td>3. (a) Previous USDA Registration Number(s) [if any]</td>
<td></td>
</tr>
<tr>
<td>4. (b) Active USDA Certificate Number(s) in which you have an interest</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>ARE YOU USING FEDERAL FUNDS TO CARRY OUT RESEARCH, TESTS, OR EXPERIMENTS?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FEDERAL FUND TYPE(S):</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Award</td>
<td>Contract</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TYPE OF ORGANIZATION:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Award</td>
<td>Contract</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TYPE OF ORGANIZATION:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Class E: Exhibitor</td>
<td>Class H: Intermediate Handler</td>
</tr>
</tbody>
</table>

### Certification

I certify that the information provided herein is true and correct to the best of my knowledge. I hereby acknowledge receipt of and agree to comply with all the regulations and standards contained in 9 CFR Subpart A, parts 1, 2, and 3. I certify that all listed persons are 18 years of age or older.

<table>
<thead>
<tr>
<th>SIGNATURE</th>
<th>NAME AND TITLE (Type or Print)</th>
<th>DATE SIGNED</th>
</tr>
</thead>
</table>

---

**Figure A-12** APHIS Form 7011—Application for Registration Update
Figure A-13  APHIS Form 7011A–Application for New Registration
APHIS Form 7019–Record of Animals on Hand (Other than Dogs and Cats)

<table>
<thead>
<tr>
<th>CONTAINER TAG NUMBER</th>
<th>AMOUNT</th>
<th>SPECIES</th>
<th>NUMBER</th>
<th>SEX</th>
<th>NUMBER</th>
<th>ADOULT</th>
<th>NUMBER</th>
<th>YOUNG</th>
<th>NUMBER</th>
<th>BUSINESS YEAR</th>
<th>PAGE NUMBER</th>
<th>DATE SOLD, EXCHANGED OR DONATED</th>
<th>DATE DIED</th>
<th>INVOICE NUMBER</th>
<th>INVOICE DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Figure A-14 APHIS Form 7019–Record of Animals on Hand (Other than Dogs and Cats)
### APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats)

![Form Image]

Figure A-15 APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats)
### APHIS Form 7020A—Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals (Other than Dogs and Cats)

This record is authorized by law (7 U.S.C. 2131-2156). Failure to maintain this record can result in a suspension or revocation of license and/or imprisonment for not more than 1 year, or a fine of not more than $1,000, or both.

See reverse side for additional information.

<table>
<thead>
<tr>
<th>U.S. DEPARTMENT OF AGRICULTURE</th>
</tr>
</thead>
<tbody>
<tr>
<td>ANIMAL AND PLANT HEALTH INSPECTION SERVICE</td>
</tr>
</tbody>
</table>

**CONTINUATION SHEET FOR RECORD OF ACQUISITION, DISPOSITION OR TRANSPORT OF ANIMALS**

(Other than Dogs and Cats)

- **SALE**
- **EXCHANGE OR TRANSFER**
- **DONATION**

**A. SELLER OR DONOR (Name):**

**B. BUYER OR RECEIVER (Name):**

<table>
<thead>
<tr>
<th>NO. ANIMALS</th>
<th>NO. ANIMALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>CONFORM TO TAG NO. CREATE OR PEN NO.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NO. ANIMALS</th>
<th>NO. ANIMALS</th>
</tr>
</thead>
<tbody>
<tr>
<td>PREVIOUS INVOICE NO. (if any)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>NO. YOUNG</th>
<th>NO. ADULT</th>
</tr>
</thead>
<tbody>
<tr>
<td>INDIVIDUAL IDENTIFICATION: TATTOOS, BRACE MARKS (if applicable)</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SPECIES</th>
<th>EST. WEIGHT (lbs.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>REMARKS (Condition, etc.)</td>
<td></td>
</tr>
</tbody>
</table>

**RECEIVER’S USE**

**EXAMPLE**

**Figure A-16** APHIS Form 7020A—Continuation Sheet for Record of Acquisition, Disposition or Transport of Animals (Other than Dogs and Cats)
APHIS Form 7023—Annual Report of Research Facility

The APHIS Form 7023 is available as an electronic fillable form from the Animal Welfare website.

Figure A-17  APHIS Form 7023—Annual Report of Research Facility
## USDA, APHIS, Animal Care Animal Welfare Complaint Sheet (For APHIS Internal Use Only)

### Complaint No.

<table>
<thead>
<tr>
<th>Complaint No.</th>
<th>Date Entered</th>
<th>Received By</th>
<th>Referred To</th>
<th>Reply Due</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Facility or Person Complaint Filed Against</th>
<th>Customer/License/Registration No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>City</td>
<td>State</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Complainant</th>
<th>Organization</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Address</td>
</tr>
<tr>
<td>City</td>
<td>State</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>How was complaint received?</th>
</tr>
</thead>
</table>

### Details of Complaint:

<table>
<thead>
<tr>
<th>Results:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Application packet provided?</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>INSPECTOR</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>REVIEWED BY</td>
<td>DATE</td>
</tr>
</tbody>
</table>

---

Figure A-18  USDA, APHIS, Animal Care Animal Welfare Complaint Sheet
### USDA, APHIS, Animal Care Search for Unlicensed Activity Worksheet (For APHIS Internal Use Only)

<table>
<thead>
<tr>
<th>Search Conducted by</th>
<th>Date Conducted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Name of Establishment</th>
<th>Customer No. if applicable</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Person Contacted</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Address</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>City</th>
<th>State</th>
<th>Zip</th>
<th>Phone No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Reason for search</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Regulated activity verified</th>
<th>Non-compliances present</th>
<th>Inspection Report done?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes [ ] No [x]</td>
<td>Yes [x] No [ ]</td>
<td>Yes [x] No [ ]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Application packet and information provided?</th>
<th>Yes [x] No [ ]</th>
</tr>
</thead>
</table>

#### Details of Search:

<table>
<thead>
<tr>
<th>INSPECTOR</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>REVIEWED BY</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
USDA Examples of Personally Identifiable Information (PII)

Personally Identifiable Information (PII) is information that can be used to uniquely identify an individual. The following are some examples of data which when combined with an individual’s name constitute PII. For a decision on other data elements not indicated on this list, contact the USDA Chief Privacy Officer. Examples include:

- Bank account numbers
- Biometric record (such as fingerprint, iris scan, DNA)
- Date of birth
- Credit card numbers
- Criminal history
- Employment information to include ratings, disciplinary actions, performance elements and standards
- Financial information
- Medical history information (including medical conditions and metric information, e.g. weight, height, blood pressure)
- Mother’s maiden name
- Place of birth
- Security clearance history or related information (not including actual clearances held)
- Social security number

The identification of PII requires an analysis of material in context. The following examples, taken alone, would generally not constitute PII. Please consult the USDA Chief Privacy Officer for additional guidance.

- Academic information (credentials, areas of study)
- An individual’s name
- Digital pictures
- EIN/TIN as a business identifier

---

1 OMB’s Memorandum, M-07-16 (of May 22, 2007, “Safeguarding and Responding to the Breach of Personally Identifiable Information”) requires an analysis of PII in context: “For example, an office rolodex contains personally identifiable information (name, phone number, etc.). In this context the information probably would not be considered sensitive; however, the same information in a database of patients at a clinic which treats contagious disease probably would be considered sensitive information. Similarly, using a best judgment standard, discarding a document with the author’s name on the front (and no other personally identifiable information) into an office trashcan likely would not warrant notification to US-CERT.”
Appendix A—Forms and Worksheets
USDA Examples of Personally Identifiable Information (PII)

◆ Email addresses (work and personal)
◆ Employee present and past grades (and salary privacy)\(^1\)
◆ Employee present and past position titles and occupational series\(^1\)
◆ Phone numbers (work, home, cell)
◆ Resumes, unless they include a SSN
◆ Security clearances held
◆ Street addresses (work and personal)
◆ Written biographies (like the ones used in pamphlets or speakers)

\(^1\) OPM Regulation, 5 C.F.R. § 293.311 states that the following information "about most present and former Federal employees, is available to the public: (1) Name; (2) Present and past position titles and occupational series; (3) Present and past grades; (4) Present and past annual salary rates ... (5) Present and past duty stations; and (6) Position descriptions, identification of job elements, and those performance standards (but not actual performance appraisals) that the release of which would not interfere with law enforcement programs or severely inhibit agency effectiveness ..."
Amended Report Letter

United States Department of Agriculture

Marketing and Regulatory Programs

Animal and Plant Health Inspection Services

Animal Care

920 Main Campus Drive
Suite 200
Raleigh, NC  27606

Tel No. 919-855-7100
Fax No. 919-855-7123

Dear _____:

This amended inspection report, dated xx/xx/xx by the signature block, replaces the previous inspection report dated xx/xx/xx by the signature block. The previous inspection report is no longer valid.

Respectfully,

<YOUR NAME>

Animal Care is a part of the Department of Agriculture’s Animal and Plant Health Inspection Service.

An Equal Opportunity Provider and Employer
The Environment Enhancement Plan (EEP) Checklist is intended to help you and the licensee evaluate EE plans. There is no requirement that you use this Checklist. And there is no requirement that an EE plan contain everything on this list.

At facilities, you will see enrichment activities that meet the requirements and are not on this checklist, and that is acceptable. This list is not all inclusive. This is just another tool to help us consider the factors that go into appropriate enrichment.

This Checklist may be used:
- By a new inspector or for training a new inspector
- To prepare for an inspection if you have not reviewed EE Plans in a while
- To assist applicants develop their plans
- To assist licensees if they have a change in their inventory, or have some EE NCIs, or just want to be sure they don’t miss anything

NOTE: The form should not be retained in ACIS or any facility file. It can be left with the licensee or disposed of at the end of the inspection.
### FOR APHIS INTERNAL USE

#### §3.81 Environment Enhancement Plan Inspection Checklist

<table>
<thead>
<tr>
<th>Social needs (a)</th>
<th>Environmental Enrichment (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Housing</strong></td>
<td><strong>Structure and Substrate</strong></td>
</tr>
<tr>
<td>□ Group</td>
<td>- Opportunities to express species-typical postures for resting, sleeping, feeding, exploration and play</td>
</tr>
<tr>
<td>□ Pair</td>
<td>□ Perches</td>
</tr>
<tr>
<td>□ Intermittent social contact</td>
<td>□ Mirrors</td>
</tr>
<tr>
<td>□ Partial social contact</td>
<td>□ Nest boxes (e.g. marmosets, tamarins, owl monkeys, aye ayes)</td>
</tr>
<tr>
<td>□ Single</td>
<td>□ Nesting material (e.g. great apes)</td>
</tr>
</tbody>
</table>

- justification for single housing available
- Visual and auditory contact with conspecifics (or compatible species) is provided (a)(3)
- Other:

| □ Plan to meet social needs for individually housed primates |

#### Special Considerations (c)

- Infants and young juveniles (c)(1)

- Maternal care for infants (until at least 6 months of age)

- Social needs of early weaned infants are met

- Appropriate social opportunities are provided to juveniles

- NHPs exempted from the EEP are present

- Animals exempted from all or part of the EEP receive special attention (c)(3) or (c)(4)

- Exemption is either specified as permanent or reviewed by th AV every 30 days (c)(1)

| □ Chimpanzees over 110lbs are present | □ Swings, ladders, ropes Brachiation |

| □ provided with additional opportunities to express species-typical behavior (c)(5) |

- Opportunities to express species-typical locomotion

| □ Foraging and Exploration |

| □ Foraging enrichment |

| □ Puzzle feeders (includes cup feeders, fishing feeders, etc.) |

| □ Foraging boards/feeding |

| □ Produce requiring processing |

| □ Items are regularly filled |

| □ Supplies to fill forage devices are present |

| □ Program for sanitation and novelty Manipulanda |

| □ Toys (provided to ALL animals) |

| □ Program for sanitation and novelty |

| □ Varied sensory stimuli |

| □ Variety of produce offered |

| □ Visual stimulation |

| □ Olfactory enrichment |

| □ Auditory enrichment |

| □ Other: |

#### Program for identifying and managing abnormal behavior (c)(2)

| □ Facility staff is able to recognize abnormal behavior |

| □ Program for behavior assessment |

| □ Abnormal behavior observed during inspection |

| □ hyperaggressiveness |

| □ stereotypy |

| □ self directed behavior |

| □ alopecia |

| □ abnormal posture |

If abnormal behavior observed:

| □ Program for managing abnormal behavior |

| □ Program for managing abnormal behavior is assessed and modified as needed |

Each item/check box on this list is NOT a requirement under AWR 3.81, the items are listed as commonly used means to meet the requirements for social needs and opportunities to express species typical behavior. The intent of the checklist is to help conduct a thorough assessment of the EEP. The form should not be retained and can be left with the licensee/registrant or disposed of at the end of the inspection.

---

**Figure A-22 Environmental Enrichment Plan Checklist (2 of 2)**
Handling of Dangerous Animals Letter

Before APHIS can issue a license to you to engage in regulated activities that involve the handling of dangerous or potentially dangerous animals, you must demonstrate compliance with the applicable Animal Welfare Act regulations and standards (including demonstrating that you and your employees have adequate experience and training to handle such animals in accordance with the regulatory requirements). For the safety of the personnel and the animals, we strongly encourage at least two persons be present when working with dangerous animals in a free or potential contact environment.

Exhibitions That Do Not Involve Direct Public Contact With Animals:
The handling regulations require that animals must be handled during public exhibition so that there is minimal risk of harm to the animals and to the public, with sufficient distance and/or barriers between the animals and the general viewing public so as to ensure the safety of the animals and the public. The regulations further require that dangerous animals exhibited to the public must be under the direct control and supervision of a knowledgeable and experienced animal handler. Animal handlers should have demonstrable knowledge of and skill in currently accepted professional standards and techniques in animal training and handling. They should also be able to recognize normal and abnormal behavior and signs of behavioral stress for the species being exhibited, in order to comply with the handling regulations. Handlers must be experienced and be able to apply their knowledge to the safe exhibition of animals. This generally requires at least two years of experience involving the species being exhibited.

Exhibitions That Allow Direct Public Contact With Animals:
Exhibitions that may involve direct public contact include, but are not limited to, circuses, carnivals, elephant rides, photo opportunities, magic acts, and public feeding of animals. The regulations prohibit the use of drugs to facilitate, allow, or provide for public handling of any animals. Public contact with certain dangerous animals may not be done safely under any conditions. In particular, direct public contact with juvenile and adult felines (e.g., lions, tigers, jaguars, leopards, cougars) does not conform to the handling regulations, because it cannot reasonably be conducted without a significant risk of harm to the animal or the public. The handling regulations do not appear to specifically prohibit direct public contact with infant animals, so long as it is not rough or excessive, and so long as there is minimal risk of harm to the animal and to the public. If you intend to exhibit juvenile or adult large felines (e.g., lions, tigers, jaguars, leopards, cougars), and would like Animal Care to review your proposed exhibition to determine whether it will comply with the handling regulations, please include with your application a description of the intended exhibition, including the number, species, and age of animals involved and the expected public interaction.

The regulations require that a responsible, knowledgeable and readily identifiable employee be present during all periods of public contact. In addition to the handler qualifications described in the preceding section, handlers of animals exhibited in direct contact with the public should have at least one year of experience with public contact exhibition of the species involved.

Figure A-23 Handling of Dangerous Animals Letter (1 of 2)
Only handlers who meet these qualifications should be allowed to handle the animals during public contact. At least two qualified handlers should be present during periods of public contact, and more qualified handlers may be needed depending on the number of animals and circumstances of the exhibition. Comparable alternative safety measure will be considered on an individual basis. Additional personnel may be needed to guard against members of the public inappropriately approaching the animals. These personnel are not required to meet the handler qualifications.

We strongly encourage licensees who operate public contact venues to have a written contingency plan to address restraint, recapture, and/or euthanasia of the animals in the event of aggressive behavior, escape, and/or other emergency situations. Such a plan should include, at a minimum, procedures for handling and recapturing escaped animals, a clear description of the chain of command during such events, criteria for selecting restraint methods, protocols for euthanasia in emergency situations, and provisions for contacting local law enforcement and animal control officials. Emergency equipment identified in the contingency plan (such as CO2 fire extinguishers, high pressure hoses, pepper sprays, darting equipment, chemical restraint drugs, nets, cell phone, 2-way radios, etc.) should be available during all periods of potential public contact.

To facilitate the licensing procedures and to aid in determining whether an applicant can demonstrate compliance with the handler qualification and safety requirements, we request that documentation of handler qualifications and a copy of the contingency plan be submitted to this office for review and determination of acceptability under the Animal Welfare Act.

Please send all information to this office. If you have any questions, please call this office at 970/494-7478 during the hours of 7:30 am to 4:00 pm, Monday through Friday.

Sincerely,

Robert M. Gibbens, DVM
Director, Western Region
USDA, APHIS, Animal Care

1 over 3 months of age.

12/20/01
Appendix A—Forms and Worksheets

Inspection Report Review Checklist

FOR APHIS INTERNAL USE

INSPECTION REPORT REVIEW CHECKLIST

When reviewing an Inspection Report, the reviewer should make sure that all the applicable criteria below are met:

General Information

- Inspection type is correct (Routine, PL Inspection #1, Site Additions are marked as Routine, etc.)
- Report not written on a canceled site
- “Prepared by”: same as or later than “Inspection date”
- “Received by” date: before earliest correction deadline, 5 days or less from “Inspection date”, and same as or after “Prepared by”
- Name in “Received by” matches licensee name or is a facility representative
- Certified mail number included on report, if applicable
- Reports with Directs were not emailed or sent certified mail

Narrative

- If no NCIs, Report has appropriate statement
- NCI citation contains all 4 parts, if appropriate
  - Regulation (appropriate section and specific subparts for the NCI)
  - Description of NCI (clear, appropriate details including animal ID, no diagnosis)
  - Why the problem is an NCI (appropriate, reasonable consequence)
  - Appropriate general description of how licensee/registrant can correct the problem, and a reasonable correction deadline (unless Repeat, PL, or New Site Approval inspection)
- Narrative is clear, reasonably free of improper grammar or spelling errors, and objective
- Direct NCIs appropriately classified (unless PL)
- Same problem is not cited in multiple CFRs, unless appropriate
- Focused inspections are appropriately described
- Final statement regarding who conducted the inspection and the exit briefing and when it occurred if report not delivered day of inspection
- Amended reports are not noted as “Amended”
- No extraneous, unrelated, or inappropriate information
- Report follows all Inspection Guide requirements and supervisory guidance
- Pre-License reports have all required statements
  - Passing PL: type license requested and payment information
  - Non-passing PL: how many inspections left and deadline date for 90 days window
  - All PL: no regulated activity statement
- Look at previous report(s) to verify Repeat NCIs
- Repeats notated correctly, i.e., inspector didn’t shift section numbers (e.g. 3.1 vs. 3.6 for same problem)
Inspections not occurring on exact same date each year

**Documentation (photos, videos, document)**
- Required photos for Repeats, Criticals, Directs, Corrected Directs, Corrected Vet Care, all NCIs at facility with ongoing IES investigation, and commercial airlines
- Documentation clearly and accurately depicts the NCI
- Close-ups and overviews are included as needed for orientation
- Animal IDs included in picture labels for vet care, space, and when appropriate
- Animals are present in the photo (if possible)
- Uploaded or photographed documents or records are readable
- View videos and listen to audio to ensure content is appropriate and depicts NCIs
- If documentation contains confidential business information, ensure this is noted in label
- Labels are present for all documentation and are sufficiently detailed
- Documentation assigned to appropriate CFR(s) unless showing corrected items or overviews
- Note if documentation depicts an NCI not included on report
- Note if required photographs were not included
- If documentations does not support NCIs or raises any concerns, make note to discuss with inspector

**Animal Inventory**
- Verify inventory included
- Assess completeness (numbers make sense with NCI narratives, all species mentioned in report are included, etc.)
- Note unusually large facilities or unusual mixes of species (e.g. 3000 pigs; 300 dogs + 1 tiger)

**Information which should NOT be on the Inspection Report**
- No licensee names in body of report
- No addresses of animal facilities or inappropriately detailed building descriptions
- No confidential business information
- No proprietary scientific information

If any errors are noted by the non-Supervisor reviewer, the Inspection Report should be referred to the Supervisor. Supervisors will contact the inspector to discuss the Inspection Report.

**August 2016**
Options for Identification of Dogs and Cats

Tag: USDA # (48-A-0000) & Individual # (personal ID #: 1, 27, 32, etc.)
NOTE: Tags must include the letters USDA

Tattoo: The tattoo letters will be issued by this office after a written request from the licensee.

Microchip: No prior approval required.

ID Tags:

**Metal**

Ketchum Mfg. Co.
Lake Luzerne, NY 12846
518-696-3331
800-222-0460
Round Tags Only

Nat’l Band & Tag Co.
721 York St.
New Port, KY 41072
859-261-2035 or Fax 800-261-8247
[http://www.nationalband.com](http://www.nationalband.com)

The Keyes-Davis Co.
74 14th St.
Battle Creek, MI 49015
269-962-7505

**Plastic**

Nat’l Band & Tag Co.
721 York St.
New Port, KY 41072
859-261-2035 or Fax 800-261-8247
[http://www.nationalband.com](http://www.nationalband.com)

**Microchips**

AVID
155 Woodside Dr.
Mandeville, LA 70448
800-434-2843

Home-Again: AKC Companion Animal Recovery
5580 Centerview Dr.
Raleigh, NC 27606
800-252-7894 or 800-313-5737
Fax: 919-233-1290
[found@akc.org](mailto:found@akc.org)

Infopet
5404 Mark Court
Agoura Hills, CA 91301
818-707-9942

Revival
913 8th St. South West
Orange City, IA 51041
712-737-5555

USDA does not endorse the specific companies listed here.
Many other companies supply tags that will comply with USDA standards.

Figure A-27 Options for Identification of Dogs and Cats
Appendix A—Forms and Worksheets
Perimeter Fence Variance Request Letter

Perimeter Fence Variance Request Letter

Dear Licensee/Registrant

APHIS published a change to the standards which requires all outdoor housing facilities to be enclosed by a perimeter fence that is of sufficient height to keep animals and unauthorized persons out. All facilities must meet this requirement on or before May 17, 2000 or have a variance from this standard.

Potentially dangerous animals require an 8 feet perimeter fence. Examples of these species include, but are not limited to, bears, wolves, rhinoceros, elephants, large felines (lions, tigers, leopards, cougars, jaguars), etc. All other species require a 6 feet perimeter fence. Examples of these species include, but are not limited to, ferrets, raccoons, skunks, elk, deer, antelope, small exotic felines (margay, fishing cat, lynx), etc. The perimeter fence must be located at least 3 feet from the primary enclosure. Fences not meeting these requirements must be approved by the Administrator.

You may request a variance from the perimeter fence requirements if one or more of the following conditions are met:
- the outside walls of the primary enclosures are made of sturdy, durable material and are constructed in a manner that restricts the entry of animals and unwanted persons
- the outdoor housing facility is protected by an effective barrier that restricts the regulated animals to the facility and restricts entry by animals and unwanted persons
- appropriate alternative security measures are used

To request a variance, please submit in writing the following information:
- your name and address
- your business name, if applicable
- license or registration number
- a description of the animal’s primary enclosures (size, wall/fence height, construction materials used for the enclosure walls)
- describe the species of animals in each enclosure (number within each enclosure, age, health status)
- describe the location of your facility (rural, urban, remote, residential, closeness of neighbors, etc.)
- description of barrier fence (construction materials of the barrier, distance from enclosure walls, height of barrier)
- description of current perimeter fence (height, construction materials used for the perimeter fence)
- description of alternative security measures, such as security guards/personnel, cameras, alarms, etc.

Animal Care is a part of the Department of Agriculture’s Animal and Plant Health Inspection Service.
An Equal Opportunity Provider and Employer

Figure A-28 Perimeter Fence Variance Request Letter (1 of 2)
We recommend you include pictures and/or a drawing of the layout of your facility and enclosures to assist us in evaluating your facility.

Mail your request and supporting documents to:

USDA-APHIS-Animal Care
920 Main Campus Drive, Suite 200
Raleigh, NC 27606
OR
USDA-APHIS-Animal Care
2150 Centre Ave., Building B
Mailstop 3W11
Ft. Collins, CO 80526-8117

We appreciate your efforts to comply with the Animal Welfare Act. If you have any questions or concerns, please do not hesitate to call our office.

Sincerely,

Regional Director
Animal Care

Animal Care is a part of the Department of Agriculture’s Animal and Plant Health Inspection Service.

An Equal Opportunity Provider and Employer

Figure A-29  Perimeter Fence Variance Request Letter (2 of 2)
State and Territory Identification Codes

<table>
<thead>
<tr>
<th>Code</th>
<th>State</th>
<th>Code</th>
<th>State</th>
</tr>
</thead>
<tbody>
<tr>
<td>64</td>
<td>ALABAMA - AL</td>
<td>11</td>
<td>MAINE</td>
</tr>
<tr>
<td>96</td>
<td>ALASKA - AK</td>
<td>12</td>
<td>NEW HAMPSHIRE</td>
</tr>
<tr>
<td>86</td>
<td>ARIZONA - AZ</td>
<td>13</td>
<td>VERMONT</td>
</tr>
<tr>
<td>71</td>
<td>ARKANSAS AR</td>
<td>14</td>
<td>MASSACHUSETTS</td>
</tr>
<tr>
<td>93</td>
<td>CALIFORNIA - CA</td>
<td>15</td>
<td>RHODE ISLAND</td>
</tr>
<tr>
<td>84</td>
<td>COLORADO - CO</td>
<td>16</td>
<td>CONNECTICUT</td>
</tr>
<tr>
<td>16</td>
<td>CONNECTICUT</td>
<td>21</td>
<td>NEW YORK</td>
</tr>
<tr>
<td>50</td>
<td>DELAWARE - DE</td>
<td>22</td>
<td>NEW JERSEY</td>
</tr>
<tr>
<td>58</td>
<td>FLORIDA - FL</td>
<td>23</td>
<td>PENNSYLVANIA</td>
</tr>
<tr>
<td>67</td>
<td>GEORGIA - GA</td>
<td>31</td>
<td>OHIO</td>
</tr>
<tr>
<td>97</td>
<td>GUAM - GÚ</td>
<td>32</td>
<td>IOWA</td>
</tr>
<tr>
<td>95</td>
<td>HAWAII - HI</td>
<td>33</td>
<td>ILLINOIS</td>
</tr>
<tr>
<td>82</td>
<td>IDAHO - ID</td>
<td>34</td>
<td>MICHIGAN</td>
</tr>
<tr>
<td>33</td>
<td>ILLINOIS - IL</td>
<td>35</td>
<td>WISCONSIN</td>
</tr>
<tr>
<td>32</td>
<td>INDIANA - IN</td>
<td>41</td>
<td>MINNESOTA</td>
</tr>
<tr>
<td>42</td>
<td>IOWA - IA</td>
<td>42</td>
<td>IOWA</td>
</tr>
<tr>
<td>48</td>
<td>KANSAS - KS</td>
<td>43</td>
<td>MISSOURI</td>
</tr>
<tr>
<td>61</td>
<td>KENTUCKY - KY</td>
<td>45</td>
<td>NORTH DAKOTA</td>
</tr>
<tr>
<td>72</td>
<td>LOUISIANA - LA</td>
<td>46</td>
<td>SOUTH DAKOTA</td>
</tr>
<tr>
<td>11</td>
<td>MAINE - ME</td>
<td>47</td>
<td>NEBRASKA</td>
</tr>
<tr>
<td>69</td>
<td>MARIANA ISLANDS- MP</td>
<td>48</td>
<td>KANSAS</td>
</tr>
<tr>
<td>51</td>
<td>MARYLAND - MD</td>
<td>50</td>
<td>DELAWARE</td>
</tr>
<tr>
<td>14</td>
<td>MASSACHUSETTS - MA</td>
<td>51</td>
<td>MARYLAND</td>
</tr>
<tr>
<td>34</td>
<td>MICHIGAN - MI</td>
<td>52</td>
<td>VIRGINIA</td>
</tr>
<tr>
<td>41</td>
<td>MINNESOTA - MN</td>
<td>54</td>
<td>WEST VIRGINIA</td>
</tr>
<tr>
<td>65</td>
<td>MISSISSIPPI - MS</td>
<td>55</td>
<td>NORTH CAROLINA</td>
</tr>
<tr>
<td>43</td>
<td>MISSOURI - MO</td>
<td>56</td>
<td>SOUTH CAROLINA</td>
</tr>
<tr>
<td>81</td>
<td>MONTANA - MT</td>
<td>57</td>
<td>GEORGIA</td>
</tr>
<tr>
<td>47</td>
<td>NEBRASKA - NE</td>
<td>58</td>
<td>FLORIDA</td>
</tr>
<tr>
<td>88</td>
<td>NEVADA - NV</td>
<td>61</td>
<td>KENTUCKY</td>
</tr>
<tr>
<td>12</td>
<td>NEW HAMPSHIRE - NH</td>
<td>63</td>
<td>TENNESSEE</td>
</tr>
<tr>
<td>22</td>
<td>NEW JERSEY - NJ</td>
<td>64</td>
<td>ALABAMA</td>
</tr>
<tr>
<td>85</td>
<td>NEW MEXICO - NM</td>
<td>65</td>
<td>MISSISSIPPI</td>
</tr>
<tr>
<td>21</td>
<td>NEW YORK - NY</td>
<td>69</td>
<td>MARIANA ISLANDS</td>
</tr>
<tr>
<td>55</td>
<td>NORTH CAROLINA - NC</td>
<td>71</td>
<td>ARKANSAS</td>
</tr>
<tr>
<td>45</td>
<td>NORTH DAKOTA - ND</td>
<td>72</td>
<td>LOUISIANA</td>
</tr>
<tr>
<td>31</td>
<td>OHIO - OH</td>
<td>73</td>
<td>OKLAHOMA</td>
</tr>
<tr>
<td>73</td>
<td>OKLAHOMA - OK</td>
<td>74</td>
<td>TEXAS</td>
</tr>
<tr>
<td>92</td>
<td>OREGON - OR</td>
<td>81</td>
<td>MONTANA</td>
</tr>
<tr>
<td>23</td>
<td>PENNSYLVANIA - P</td>
<td>82</td>
<td>IDAHO</td>
</tr>
<tr>
<td>94</td>
<td>PUERTO RICO - PR</td>
<td>83</td>
<td>WYOMING</td>
</tr>
<tr>
<td>15</td>
<td>RHODE ISLAND - RI</td>
<td>84</td>
<td>COLORADO</td>
</tr>
<tr>
<td>56</td>
<td>SOUTH CAROLINA - SC</td>
<td>85</td>
<td>NEW MEXICO</td>
</tr>
<tr>
<td>46</td>
<td>SOUTH DAKOTA - SD</td>
<td>86</td>
<td>ARIZONA</td>
</tr>
<tr>
<td>63</td>
<td>TENNESSEE - TN</td>
<td>87</td>
<td>UTAH</td>
</tr>
<tr>
<td>74</td>
<td>TEXAS - TX</td>
<td>88</td>
<td>NEVADA</td>
</tr>
<tr>
<td>67</td>
<td>UTAH - UT</td>
<td>91</td>
<td>WASHINGTON</td>
</tr>
<tr>
<td>13</td>
<td>VERMONT - VJ</td>
<td>92</td>
<td>OREGON</td>
</tr>
<tr>
<td>52</td>
<td>VIRGINIA - VA</td>
<td>93</td>
<td>CALIFORNIA</td>
</tr>
<tr>
<td>91</td>
<td>WASHINGTON - WA</td>
<td>94</td>
<td>PUERTO RICO</td>
</tr>
<tr>
<td>54</td>
<td>WEST VIRGINIA - WV</td>
<td>95</td>
<td>HAWAII</td>
</tr>
<tr>
<td>35</td>
<td>WISCONSIN - WI</td>
<td>96</td>
<td>ALASKA</td>
</tr>
<tr>
<td>83</td>
<td>WYOMING - WY</td>
<td>97</td>
<td>GUAM</td>
</tr>
</tbody>
</table>

DARK color is EASTERN REGION
LIGHT color is WESTERN REGION

Figure A-30 State and Territory Identification Codes
Teachable Moments Review Checklist

FOR APHIS INTERNAL USE

Teachable Moment Review Checklist

May 31, 2016

Documents needed to review a TM:
- The corresponding inspection report
- The previous IR and TM
- Enforcement History

When reviewing Teachable Moments (TM), the reviewer should ensure that the use of the TM was appropriate, using the following criteria:

Facilities which are not appropriate for the use of the TM:
- Prelicense or New Site Addition
- Poor compliance record
- Under investigation or have a current case at OGC
- History of refusal of inspection or interference

NCIs which are not appropriate for the use of the TM:
- Impacting animal welfare
- Direct or critical
- Could soon become direct or critical
- Previous TM or citation
- Same section is being cited on the inspection report
- Item may actually be in compliance

If any of the following TM apply to a Research Facility or contains a red flag, it should be reviewed carefully by the Supervisor or referred to the Supervisor:
- Veterinary Care
- Handling
- Space

The TM is not documented appropriately if:
- 4 or more TMs are noted, possibly too many
- Section # is incorrect
- Narrative contains excessive detail*
- No narrative or insufficient detail*
- Reviewer is unable to determine if TM is appropriate and needs more information

Example TM Narrative
3.1 (c) Not enough detail: dirty den boxes / carpet strings

Too much detail: 2 pens in the Yorkie area in the top barn (# 3 and 4) have mild staining around the den box opening and should be cleaned more frequently. In 2 pens in the whelping area, # 6 and 8, housing 2 litters of poodles, there are carpet strings /
FOR APHIS INTERNAL USE

Teachable Moment Review Checklist

May 31, 2016

excessive wear on 25% of each carpet. The owner did not want to disturb the new mother for the last couple days but has a plan to replace the whelping carpets with the pups tomorrow.

Appropriate detail: 2 pens have staining at dog door (need more frequent cleaning) & 2 whelping boxes with worn carpets need carpets replaced.

If any of the above criteria are noted by the non-Supervisor reviewer, the TM form should refer to the Supervisor. Supervisors will contact the inspector to discuss the TM.
Appendix B—Direct Noncompliance Item (NCI) Guidance

(9 CFR Parts 2-3)

Contents

Direct NCI Guidance  B-2
### Direct NCI Guidance

#### Table B-1  Direct Noncompliance Item Guidance

<table>
<thead>
<tr>
<th>9 CFR Section Number</th>
<th>Example of Direct NCI</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section 2.40</strong></td>
<td></td>
</tr>
<tr>
<td>Attending Veterinarian and Adequate Veterinary Care</td>
<td>Cherry eye, eye opacity or enlarged eye globe with inflammation and abnormal discharge</td>
</tr>
<tr>
<td><strong>NOTE:</strong> If a licensee or registrant can demonstrate via records or other means that he/she has taken the proper steps to mitigate the injury and/or death of the animal, a noncompliance has <strong>not</strong> occurred. These proper steps include, but are <strong>not</strong> limited to:</td>
<td></td>
</tr>
<tr>
<td>1. Identifying the condition requiring veterinary care in a timely manner;</td>
<td></td>
</tr>
<tr>
<td>2. Acquiring veterinary care and/or initiating treatment in a timely manner; and/or</td>
<td></td>
</tr>
<tr>
<td>3. Following the treatment instructions of the Attending Veterinarian</td>
<td></td>
</tr>
<tr>
<td><strong>Section 2.129(a) and (b)</strong></td>
<td>A confiscation would be the result of a situation that involved animal suffering due to AWA non-compliances and would therefore be considered a Direct NCI; this would typically be cited in the associated sections (vet care, feeding, shelter, etc.), but if 2.129 is cited, it is a direct NCI.</td>
</tr>
<tr>
<td><strong>Section 2.130</strong></td>
<td>Transportation of a dog or cat that has <strong>not</strong> been weaned, <strong>without</strong> their dam or queen, and <strong>without</strong> appropriate variances or exceptions (if required)</td>
</tr>
<tr>
<td>Minimum Age Requirements</td>
<td></td>
</tr>
<tr>
<td><strong>Section 2.131</strong></td>
<td>Death or severe injury to animal as a result of handling procedures; also behavioral stress due to handling non-compliances</td>
</tr>
<tr>
<td>Handling of Animals</td>
<td></td>
</tr>
<tr>
<td><strong>Use of items that cause physical injury, harm, or distress to the animals, such as the excessive use of the ankus, hot shot, or any tool used to train or work the animal</strong></td>
<td></td>
</tr>
<tr>
<td>Public exhibition that allows direct contact of a dangerous animal (big cat, bear, wolves, elephant, great ape, etc.) with the general public <strong>without</strong> sufficient or adequate barriers, such as use of a juvenile or adult big cat in photo shoots, elephant rides <strong>without</strong> an attendant</td>
<td></td>
</tr>
<tr>
<td>Use of tranquilizers to facilitate public handling of animals</td>
<td></td>
</tr>
<tr>
<td><strong>Failure to provide appropriate measures to alleviate any climatic weather condition that is a threat to the health and welfare of the animal, such as failing to provide sufficient heating or cooling to an animal barn or housing facility, when conditions and the species of the animal require it for the health and welfare of the animal</strong></td>
<td></td>
</tr>
<tr>
<td>Exhibition/performance of an animal that would be detrimental to its health or well-being, such as an immature/young animal that is handled excessively by the public in a petting zoo and is unable to get away from the public, or baby tigers used for photo shoots with excessive public handling showing distress</td>
<td></td>
</tr>
<tr>
<td>Facility that obtains a dangerous animal <strong>without</strong> having a person knowledgeable and experienced about the species on staff</td>
<td></td>
</tr>
</tbody>
</table>
## Table B-1  Direct Noncompliance Item Guidance (continued)

<table>
<thead>
<tr>
<th>9 CFR Section Number</th>
<th>Example of Direct NCI</th>
</tr>
</thead>
</table>
| **Section 3.1(a)** Housing Facilities General | Structure deterioration, such as rusted support posts, where the structure is in danger of falling on dogs  
Facilities not maintained; animals escape |
| **Section 3.1(b)** Housing Facilities General | Live electric wire exposed to and within easy reach of dogs (insulation removed and/or bare ends of cord exposed) |
| **Sections 3.2(a), 3.3(a), 3.5(a)** Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities | Temperature outside of allowable ranges, animal showing signs of distress  
Temperature below allowable lower ranges; dry bedding or other methods of conserving body heat not present |
| **Sections 3.2(b), 3.3(b), 3.5(b)** Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities | Lack of ventilation to the point where there are noxious fumes (e.g., your eyes burn) at the level of the animal’s eyes and nose; dogs are showing signs of discomfort and/or distress, such as squinting, coughing, sneezing, nasal discharge, etc. |
| **Sections 3.2(c), 3.3(c), 3.5(c)** Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities | Absence of lighting and absence of diurnal cycle (no windows and no broad spectrum lighting with appropriate cycling of light and dark) |
| **Sections 3.3(d), 3.4(b)** Sheltered Housing Facilities, Outdoor Housing Facilities | Sheltered area not large enough for all dogs to sit, stand, lie in a normal manner, and to turn about freely, and temperature under 45 °F or over 85 °F; dogs showing signs of discomfort and/or distress |
| **Section 3.4(a)** Outdoor Housing Facilities | Dogs and cats maintained in areas in which they are not acclimated to the temperatures prevalent in the area, and/or breeds of dogs and cats maintained in areas in which they cannot tolerate the prevalent temperatures without stress |
| **Section 3.4(b)** Outdoor Housing Facilities | Shelter without sufficient bedding and temperature under 35 °F, or between 35 and 50 °F with dogs showing signs of discomfort (shivering)  
Insufficient wind/rain break and temperature under 50 °F; water in shelter with wet dogs |
| **Section 3.6(a)(1)** Primary Enclosure | Enclosure not designed to enable dogs to remain dry, wet dogs, temperature under 45 °F  
Food situation where one dog does not let other dog(s) eat and there are signs of distress and/or emaciation |
| **Section 3.6(c)(1)** Primary Enclosure | Enclosure does not meet minimum floor space requirements and dog has behavioral and/or medical issues (example: lick granuloma) |
| **Section 3.7** Compatible Grouping | Incompatible dogs housed together with injuries and/or signs of distress |
| **Section 3.8** Exercise | Insufficient floor space and no opportunity for exercise (no written plan, no evidence of exercise area) |
| **Section 3.9(a)** Feeding | Food contaminated with feces, urine, mold, mildew, pest waste  
Emaciated dogs with no feed or inappropriate feed |
| **Section 3.10** Watering | No water or frozen water—dogs offered fresh water and drink voraciously and/or in a manner that demonstrates they are extremely thirsty  
Water contaminated with feces, urine, pest waste, mud |
## Table B-1 Direct Noncompliance Item Guidance' (continued)

<table>
<thead>
<tr>
<th>9 CFR Section Number</th>
<th>Example of Direct NCI</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section 3.11(a)</strong></td>
<td>Accumulation of excreta and food waste in the primary enclosure; animals have excreta and/or food waste on their fur, and/or cannot find adequate areas in their enclosure where they can stand or walk without being in waste</td>
</tr>
<tr>
<td><strong>Section 3.11(b)(3)</strong></td>
<td>Excessive feces and food waste are attracting an accumulation of pests (flies/mosquitoes)</td>
</tr>
<tr>
<td><strong>Section 3.11(b)(3)</strong></td>
<td>Using cold water without a disinfectant or detergent, and animals are getting ill from a contagious disease.</td>
</tr>
<tr>
<td><strong>Section 3.11(c)</strong></td>
<td>Weeds/brush are growing up and around dog pens. Vermin are seen in the dog pens, eating/defecating and/or getting into the food supply. Holes large enough to allow dogs to escape or other animals to enter, covered by the brush.</td>
</tr>
<tr>
<td><strong>Section 3.11(d)</strong></td>
<td>The presence of pests with signs of infestation such as contaminated feed, contaminated water, intense odor, fly strike, and little or no pest control in place</td>
</tr>
<tr>
<td><strong>Section 3.12</strong></td>
<td>The lack of an adequate number of employees; numerous repeat and/or direct noncompliances identified on the inspection</td>
</tr>
<tr>
<td><strong>Sections 3.13(a)(b)(c)</strong></td>
<td>A carrier/IH accepts an animal more than 4 hours before the scheduled flight departure, and there was no documentation as to when the animal was last fed or watered; and the animal either voraciously goes for food/water when offered, or it becomes ill and needs vet attention, or dies.</td>
</tr>
<tr>
<td><strong>Section 3.13(d)</strong></td>
<td>Carrier/IH accepts dog for transport in an inadequate primary enclosure; dog breaks out of the transport enclosure and is lost, injured, or killed.</td>
</tr>
<tr>
<td><strong>Section 3.13(f)</strong></td>
<td>No documentation is made that the consignee was notified when the shipment arrived, nor every 6 hours thereafter. The animal becomes ill due to the delay in notifying the consignee.</td>
</tr>
<tr>
<td><strong>Section 3.14(a)</strong></td>
<td>1. Animal was able to escape the transport enclosure. 2. Emergency presented itself and the animal enclosure could not be moved in a timely manner. 3. Limbs protruding from the enclosure. 4. Not enough ventilation openings on the enclosure. All resulting in injury, distress, or death.</td>
</tr>
<tr>
<td><strong>Section 3.14(c)</strong></td>
<td>The transport enclosure does not meet the ventilation requirements.</td>
</tr>
<tr>
<td><strong>Section 3.14(d)</strong></td>
<td>A large puppy or dog is put into a transport enclosure with a small puppy or dog, and the smaller dog is seriously injured or dies. There is a disregard for the 20 pound rule. An overly aggressive dog is shipped with another dog and the submissive dog is seriously injured or killed.</td>
</tr>
<tr>
<td><strong>Section 3.15(a-h)</strong></td>
<td>Primary conveyance is structurally unsound—exhaust fumes enter the cargo space and/or air flow is hindered, and/or animals are exposed to too cold or too hot temperatures, and/or dry ice is in the cargo space, etc. The result is injury, distress, or death.</td>
</tr>
<tr>
<td><strong>Section 3.16</strong></td>
<td>Animals are transported for more than 12 hours and are not fed or offered water (if under 16 weeks), and are now in distress and/or dehydrated and/or needing veterinary care and/or die.</td>
</tr>
</tbody>
</table>
### Appendix B—Direct Noncompliance Item (NCI) Guidance

#### Direct NCI Guidance

Section 3.17(a)
Care in Transit
- Animals are either in a truck or in a plane, and are *not* observed every 4 hours (if applicable), and the animals become severely ill, injured, distressed, and/or die.

Section 3.17(c)
Care in Transit
- Animal is obviously ill, injured, or in physical distress, but is transported anyway.

Section 3.17(d)
Care in Transit
- Animal is removed from the transport enclosure resulting in injury, escape, and/or death.

Section 3.18(c)
Terminal Facilities
- Lack of ventilation to the point where there are noxious fumes (e.g., your eyes burn) at the level of the animal’s eyes and nose; dogs are showing signs of discomfort and/or distress.

Section 3.18(d)
Terminal Facilities
- Temperatures are allowed to fall below 45 °F or above 85 °F, which results in the animals showing signs of discomfort, distress, or death.

Section 3.18(e)
Terminal Facilities
- Animals are *not* provided shelter to extreme elements, which results in the animals being injured, or showing signs of discomfort, distress, or death.

Section 3.19(a)
Handling
- When moving animals from the terminal facility to plane side, the animals were exposed to prolonged time out in the sun, extreme heat, rain, snow, or extreme cold, and now show signs of injury, discomfort, distress, or death.

Section 3.19(b)
Handling
- A transport enclosure is put on an unattended conveyor belt, or is haphazardly put onto an unattended belt and the enclosure falls off.

---

Table B-1  Direct Noncompliance Item Guidance¹ (continued)

<table>
<thead>
<tr>
<th>9 CFR Section Number</th>
<th>Example of Direct NCI</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Section 3.17(a)</strong></td>
<td>Animals are either in a truck or in a plane, and are <em>not</em> observed every 4 hours</td>
</tr>
<tr>
<td>Care in Transit</td>
<td>(if applicable), and the animals become severely ill, injured, distressed, and/or</td>
</tr>
<tr>
<td></td>
<td>die.</td>
</tr>
<tr>
<td><strong>Section 3.17(c)</strong></td>
<td>Animal is obviously ill, injured, or in physical distress, but is transported</td>
</tr>
<tr>
<td>Care in Transit</td>
<td>anyway.</td>
</tr>
<tr>
<td><strong>Section 3.17(d)</strong></td>
<td>Animal is removed from the transport enclosure resulting in injury, escape, and/or</td>
</tr>
<tr>
<td>Care in Transit</td>
<td>or death.</td>
</tr>
<tr>
<td><strong>Section 3.18(c)</strong></td>
<td>Lack of ventilation to the point where there are noxious fumes (e.g., your eyes</td>
</tr>
<tr>
<td>Terminal Facilities</td>
<td>burn) at the level of the animal’s eyes and nose; dogs are showing signs of</td>
</tr>
<tr>
<td></td>
<td>discomfort and/or distress.</td>
</tr>
<tr>
<td><strong>Section 3.18(d)</strong></td>
<td>Temperatures are allowed to fall below 45 °F or above 85 °F, which results in the</td>
</tr>
<tr>
<td>Terminal Facilities</td>
<td>animals showing signs of discomfort, distress, or death.</td>
</tr>
<tr>
<td><strong>Section 3.18(e)</strong></td>
<td>Animals are <em>not</em> provided shelter to extreme elements, which results in the</td>
</tr>
<tr>
<td>Terminal Facilities</td>
<td>animals being injured, or showing signs of discomfort, distress, or death.</td>
</tr>
<tr>
<td><strong>Section 3.19(a)</strong></td>
<td>When moving animals from the terminal facility to plane side, the animals were</td>
</tr>
<tr>
<td>Handling</td>
<td>exposed to prolonged time out in the sun, extreme heat, rain, snow, or extreme</td>
</tr>
<tr>
<td></td>
<td>cold, and now show signs of injury, discomfort, distress, or death.</td>
</tr>
<tr>
<td><strong>Section 3.19(b)</strong></td>
<td>A transport enclosure is put on an unattended conveyor belt, or is haphazardly</td>
</tr>
<tr>
<td>Handling</td>
<td>put onto an unattended belt and the enclosure falls off.</td>
</tr>
</tbody>
</table>

---

¹ Version = September 9, 2010
Appendix C—Equipment and Supplies

Contents

<table>
<thead>
<tr>
<th>Equipment</th>
<th>C-1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Equipment</td>
<td>C-2</td>
</tr>
<tr>
<td>Supplies</td>
<td>C-3</td>
</tr>
</tbody>
</table>

Equipment

The following equipment is highly recommended:

◆ Blank inspection report forms (in case of computer/printer failure)
◆ Business cards
◆ Camera/video camera and extra batteries
◆ Coveralls, preferably disposable
◆ Disposable boots
◆ Ear plugs
◆ Extra printer cartridge
◆ Memory card
◆ First-aid kit
◆ Flashlight and extra batteries
◆ Kestrel Weather Meter
◆ Laptop computer
◆ Note pad
◆ Official badge and identification
◆ Paper
◆ Pen/pencil
◆ Printer
◆ Raytek MiniTemp Thermometer
◆ Reference material, such as:
  ◆ Animal Welfare Inspection Guide
  ◆ Required Inspection Procedures
  ◆ Reference texts
  ◆ Subpart A – Animal Welfare
Appendix C—Equipment and Supplies

Equipment

◆ Soap/disinfectant
◆ Tape measure
◆ Thermometer

The following equipment is optional:
◆ Binoculars
◆ Calculator
◆ Copy machine
◆ Hand counter
◆ Inspection checklists
◆ Towels/paper towels

Special Equipment

Nonhuman Primates
The following equipment is recommended for inspecting facilities with macaques, if within 5 feet of the macaques:
◆ Biological waste bag
◆ Coveralls – preferably disposable
◆ Disinfectant
◆ Disposable gloves
◆ Exposure kit
◆ Full face shield and eye protection, such as safety glasses or goggles
◆ Respirator

The following equipment is recommended for inspecting facilities with other nonhuman primates:
◆ Respirator – Level N95, or better

Other Animals
The following equipment is recommended for inspecting elephants:

◆ Respirator – Level N95, or better

NOTICE
To wear a respirator, you must meet the APHIS Respirator Program requirements, i.e., medical clearance and fit testing.
Supplies

The following forms and information should be available for distribution to the facility and general public by the inspector:

- The Animal Welfare Act
- APHIS fact sheets
- APHIS Forms for record keeping:
  - APHIS Form 7002–Program of Veterinary Care for Research Facilities or Exhibitors/Dealers on page A-2
  - APHIS Form 7005–Record of Acquisition of Dogs and Cats on Hand on page A-8
  - APHIS Form 7006–Record of Disposition of Dogs and Cats on page A-10
  - APHIS Form 7006A–Continuation Sheet for Record of Disposition of Dogs and Cats on page A-12
  - APHIS Form 7019–Record of Animals on Hand (Other than Dogs and Cats) on page A-15
  - APHIS Form 7020A-Continuation Sheet for Record of Acquisition, Disposition, or Transport of Animals (Other than Dogs and Cats) on page A-17
  - APHIS Form 7020–Record of Acquisition, Disposition or Transport of Animals (Other Than Dogs and Cats) on page A-16
- AWA Regulations and Standards
- Handling of Dangerous Animals Letter on page A-26
- Options for Identification of Dogs and Cats on page A-30
- Perimeter Fence Variance Request Letter
Appendix D—Body Condition Charts

## Contents

- Cat     D-3
- Cougar  D-4
- Dog     D-5
- Elephant D-6
- Leopard D-7
- Lion    D-8
- Tiger   D-9
- Tiger Cub Size Information D-10
Body Condition Assessment Charts

These charts may be used to help inspectors identify animals in critical or near-critical condition which, if not addressed, could trigger a confiscation. Included are:

◆ Cat
◆ Cougar
◆ Dog
◆ Elephant
◆ Leopard
◆ Lion
◆ Tiger
◆ Tiger Cub Size Information
Cat

1. **EMACIATED**: Ribs, lumbar vertebrae, pelvic bones and all body prominences evident from a distance. No discernible body fat. Obvious absence of muscle mass.

2. **UNDERWEIGHT**: Ribs easily palpated and may be visible with no palpable fat. Tops of lumbar vertebrae visible. Pelvic bones less prominent. Obvious waist and abdominal tuck.

3. **OPTIMAL BODY WEIGHT**: Ribs palpable without excess fat covering. Abdomen tucked up when viewed from side.

4. **OVERWEIGHT**: General fleshy appearance. Ribs palpable with difficulty. Noticeable fat deposits over lumbar spine and tail base. Abdominal tuck may be absent.

5. **OBESE**: Large fat deposits over chest, spine, and tail base. Fat deposits on neck and limbs. Abdomen distended.

Source: Ohio State University, College of Veterinary Medicine

Figure D-1  Cat Body Assessment Chart
**Cougar**

1. **EMACIATED**: All ribs and vertebral bodies prominently showing, skin laying over hips and femur

2. **UNDERWEIGHT**: Ribs, vertebral bodies and hips slightly showing, “tucked up” appearance

3. **OPTIMAL BODY WEIGHT**: Hint of ribs and vertebral bodies

4. **OVERWEIGHT**: No hips or ribs showing, rotund appearance to abdomen

5. **OBESE**: Abdomen sagging, obvious fat over hips and shoulders

*Source: USDA-APHIS*

**Figure D-2 Cougar Body Assessment Chart**
1 **EMACIATED**: Ribs and lumbar vertebrae obvious, pelvic bones and all other bony structures obvious and prominent. Tail base prominent and bony. Accentuated concave abdominal tuck. Accentuated, severe hourglass shape to waist. No discernible body fat. Obvious loss of muscle mass.

2 **UNDERWEIGHT**: Ribs and lumbar vertebrae easily seen with no fat cover. Pelvic bones obvious. Tail base bony with little soft tissue. Marked concave abdominal tuck. Marked hourglass shape to waist.

3 **OPTIMAL BODY WEIGHT**: Ribs, lumbar vertebrae, pelvic bones, and other bony structures easily palpable with slight fat cover. Tail base smooth with thin, soft tissue cover. Concave abdominal tuck. Smooth hourglass shape to waist.

4 **OVERWEIGHT**: Ribs and lumbar vertebrae are difficult to palpate. Pelvic bones are palpable with moderate tissue cover. Tail base has fat deposition with moderate soft tissue cover. Concave tuck is decreased to absent. Loss of hourglass shape to waist with back is slightly broadened.

5 **OBESE**: Ribs and lumbar vertebrae are very difficult to impossible to palpate. Pelvic bones are difficult to palpate with thick tissue cover. Tail base is thickened from fat disposition with thick soft tissue cover. Abdomen is convex with or without a pendulous ventral bulge. Back is markedly broadened.

Source: USDA-APHIS

Figure D-3 Dog Body Assessment Chart
Appendix D—Body Condition Charts
Body Condition Assessment Charts

Elephant

1
EMACIATED: All ribs and vertebral bodies prominently showing, skin laying over hips and femur

2
UNDERWEIGHT: Ribs, vertebral bodies and hips slightly showing, “tucked up” appearance

3
OPTIMAL BODY WEIGHT: Hint of ribs and vertebral bodies, good muscle tone

4
OVERWEIGHT: No hips or ribs showing, rotund appearance to abdomen

5
OBESE: Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS

Figure D-4 Elephant Body Assessment Chart
Leopard

1. **EMACIATED:** All ribs and vertebral bodies prominently showing, skin laying over hips and femur

2. **UNDERWEIGHT:** Ribs, vertebral bodies and hips slightly showing, "tucked up" appearance

3. **OPTIMAL BODY WEIGHT:** Hint of ribs and vertebral bodies

Source: Photo by Patrick Giraud courtesy of Wikimedia Commons (http://en.wikipedia.org/wiki/File:Namibie_Etosha_Leopard_01edit.jpg)

4. **OVERWEIGHT:** No hips or ribs showing, rotund appearance to abdomen

5. **OBESE:** Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS

Figure D-5 Leopard Body Assessment Chart
# Appendix D—Body Condition Charts

## Body Condition Assessment Charts

### Lion

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>EMACIATED: All ribs and vertebral bodies prominently showing, skin laying over hips and femur</td>
</tr>
<tr>
<td>2</td>
<td>UNDERWEIGHT: Ribs, vertebral bodies and hips slightly showing, “tucked up” appearance</td>
</tr>
<tr>
<td>3</td>
<td>OPTIMAL BODY WEIGHT: Hint of ribs and vertebral bodies</td>
</tr>
<tr>
<td>4</td>
<td>OVERWEIGHT: No hips or ribs showing, rotund appearance to abdomen</td>
</tr>
<tr>
<td>5</td>
<td>OBESE: Abdomen sagging, obvious fat over hips and shoulders</td>
</tr>
</tbody>
</table>

Source: USDA-APHIS

Figure D-6  Lion Body Assessment Chart
Tiger

1. EMACIATED: All ribs and vertebral bodies prominently showing, skin laying over hips and femur

2. UNDERWEIGHT: Ribs, vertebral bodies and hips slightly showing, "tucked up" appearance

3. OPTIMAL BODY WEIGHT: Hint of ribs and vertebral bodies
   Source: Photo by J&K Hollingsworth, U.S. Fish and Wildlife Service

4. OVERWEIGHT: No hips or ribs showing, rotund appearance to abdomen

5. OBESE: Abdomen sagging, obvious fat over hips and shoulders

Source: USDA-APHIS

Figure D-7 Tiger Body Assessment Chart
**Tiger Cub Size Information**

Generic Bengal tiger cub weights are listed in Table D-1. Siberian tigers or Siberian/Bengal cross tiger cubs will be somewhat larger and often have longer, fuzzy hair. Females will often be a little smaller than males as they grow older. Birth weight is about 2.5 to 3.5 pounds.

<table>
<thead>
<tr>
<th>Table D-1</th>
<th>Generic Bengal Tiger Cub Weights</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age</td>
<td>Weight (pounds)</td>
</tr>
<tr>
<td>1 week</td>
<td>4.5 – 6.0</td>
</tr>
<tr>
<td>2 weeks</td>
<td>6.0 – 7.5</td>
</tr>
</tbody>
</table>

Source: Point Defiance Zoo, Tacoma WA [http://zooborns.com](http://zooborns.com)

Source: San Diego Zoo, San Diego CA [http://sdzoo.tumblr.com](http://sdzoo.tumblr.com)
## Table D-1  Generic Bengal Tiger Cub Weights (continued)

<table>
<thead>
<tr>
<th>Age</th>
<th>Weight (pounds)</th>
<th>Photograph</th>
</tr>
</thead>
<tbody>
<tr>
<td>3 weeks</td>
<td>7.5 – 9.0</td>
<td>[Image]</td>
</tr>
<tr>
<td>4 weeks</td>
<td>9 – 10</td>
<td>[Image]</td>
</tr>
</tbody>
</table>

Source: Point Defiance Zoo, Tacoma WA [http://zooborns.com](http://zooborns.com)
### Table D-1 Generic Bengal Tiger Cub Weights (continued)

<table>
<thead>
<tr>
<th>Age</th>
<th>Weight (pounds)</th>
<th>Photograph</th>
</tr>
</thead>
<tbody>
<tr>
<td>5 weeks</td>
<td>10 – 12</td>
<td><img src="http://zooborns.com" alt="Image" /></td>
</tr>
<tr>
<td>6 weeks</td>
<td>12 – 15</td>
<td><img src="http://zooborns.com" alt="Image" /></td>
</tr>
</tbody>
</table>

Source: Point Defiance Zoo, Tacoma WA [http://zooborns.com](http://zooborns.com)
### Table D-1  Generic Bengal Tiger Cub Weights (continued)

<table>
<thead>
<tr>
<th>Age</th>
<th>Weight (pounds)</th>
<th>Photograph</th>
</tr>
</thead>
<tbody>
<tr>
<td>7 weeks</td>
<td>14 – 17</td>
<td><img src="source" alt="Photograph" /></td>
</tr>
<tr>
<td>8 weeks</td>
<td>16 – 19</td>
<td><img src="source" alt="Photograph" /></td>
</tr>
</tbody>
</table>
### Table D-1 Generic Bengal Tiger Cub Weights (continued)

<table>
<thead>
<tr>
<th>Age</th>
<th>Weight (pounds)</th>
<th>Photograph</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 weeks</td>
<td>19 – 25</td>
<td><img src="source" alt="Tiger Cub" /></td>
</tr>
<tr>
<td>12 weeks</td>
<td>24 – 40</td>
<td><img src="source" alt="Tiger Cub" /></td>
</tr>
</tbody>
</table>

Source: USDA APHIS

Source: [http://zooborns.com](http://zooborns.com)
### Table D-1  Generic Bengal Tiger Cub Weights (continued)

<table>
<thead>
<tr>
<th>Age</th>
<th>Weight (pounds)</th>
<th>Photograph</th>
</tr>
</thead>
<tbody>
<tr>
<td>16 weeks</td>
<td>35 – 50</td>
<td><img src="http://www.flickr.com" alt="Image" /></td>
</tr>
<tr>
<td>20 weeks</td>
<td>55 – 68</td>
<td><img src="http://bronxzoo.com" alt="Image" /></td>
</tr>
</tbody>
</table>

Source: Bronx Zoo, Bronx NY [http://bronxzoo.com](http://bronxzoo.com)
Introduction

Use this glossary to find the meaning of specialized words, abbreviations, acronyms, and terms used in the Inspection Guide or other Animal Care documents. The definitions originate from 9 CFR Part 1 Section 1.1

Abbreviations, Acronyms and Specialized Terms

AAALAC. Association for Assessment and Accreditation of Laboratory Animal Care International

AALAS. American Association for Laboratory Animal Science

AC. Animal Care – a division of USDA, APHIS

ACIS. Animal Care Information System


AC Regional Director. a veterinarian or his designee, employed by APHIS, who is assigned by the Administrator to supervise and perform the official work of APHIS in a given State or States. As used in 9 CFR Part 2, the AC Regional Director shall be deemed to be the person in charge of the official work of APHIS in the State in which the dealer, exhibitor, research facility, intermediate handler, carrier, or operator of an auction sale has his principal place of business

activity. those elements of research, testing, or teaching procedures that involve the care and use of animals

administrative unit. the organizational or management unit at the departmental level of a research facility
**Administrator.** The Administrator, Animal and Plant Health Inspection Service, or any person authorized to act for the Administrator

**ambient temperature.** the air temperature surrounding the animal.

**animal.** any live or dead dog, cat, nonhuman primate, guinea pig, hamster, rabbit, or any other warmblooded animal, which is being used, or is intended for use for research, teaching, experimentation, or exhibition purposes, or as a pet. This term excludes birds, rats of the genus Rattus, and mice of the genus Mus, bred for use in research; horses not used for research purposes; and other farm animals, such as, but not limited to, livestock or poultry used or intended for use as food or fiber, or livestock or poultry used or intended for use for improving animal nutrition, breeding, management, or production efficiency, or for improving the quality of food or fiber. With respect to a dog, the term means all dogs, including those used for hunting, security, or breeding purposes

**animal act.** any performance of animals where such animals are trained to perform some behavior or action or are part of a show, performance, or exhibition

**APHIS.** Animal and Plant Health Inspection Service

**APHIS official.** any person employed by the Department who is authorized to perform a function under the Act and the regulations in 9 CFR parts 1, 2, and 3

**ARD.** Assistant Regional Director

**attending veterinarian.** a person who has graduated from a veterinary school accredited by the American Veterinary Medical Association's Council on Education, or has a certificate issued by the American Veterinary Medical Association's Education Commission for Foreign Veterinary Graduates, or has received equivalent formal education as determined by the Administrator; has received training and/or experience in the care and management of the species being attended; and who has direct or delegated authority for activities involving animals at a facility subject to the jurisdiction of the Secretary

**AVMA.** American Veterinary Medical Association

**AWA.** Animal Welfare Act

**AWIC.** Animal Welfare Information Center
buffer area. that area in a primary enclosure for a swim-with-the dolphin program that is off-limits to members of the public and that directly abuts the interactive area

business hours. a reasonable number of hours between 7 a.m. and 7 p.m., Monday through Friday, except for legal Federal holidays, each week of the year, during which inspections by APHIS may be made

carrier. the operator of any airline, railroad, motor carrier, shipping line, or other enterprise which is engaged in the business of transporting any animals for hire

cat. any live or dead cat (*Felis catus*) or any cat-hybrid cross

CFR. Code of Federal Regulations

class “A” licensee (breeder). a person subject to the licensing requirements under 9 CFR Part 2 and meeting the definition of a “dealer” (Sec. 1.1), and whose business involving animals consists only of animals that are bred and raised on the premises in a closed or stable colony and those animals acquired for the sole purpose of maintaining or enhancing the breeding colony

class “B” licensee (breeder). a person subject to the licensing requirements under part 2 and meeting the definition of a “dealer” (Sec. 1.1), and whose business includes the purchase and/or resale of any animal. This term includes brokers, and operators of an auction sale, as such individuals negotiate or arrange for the purchase, sale, or transport of animals in commerce. Such individuals do not usually take actual physical possession or control of the animals, and do not usually hold animals in any facilities. A class “B” licensee may also exhibit animals as a minor part of the business

class “C” licensee (exhibitor). a person subject to the licensing requirements under part 2 and meeting the definition of an “exhibitor” (Sec. 1.1), and whose business involves the showing or displaying of animals to the public. A class “C” licensee may buy and sell animals as a minor part of the business in order to maintain or add to his animal collection

commerce. trade, traffic, transportation, or other commerce: (1) Between a place in a State and any place outside of such State, including any foreign country, or between points within the same State but through any place outside thereof, or within any territory, possession, or the District of Columbia; or (2) Which affects the commerce described in this part. Committee means the Institutional Animal Care and Use Committee (IACUC) established under section 13(b) of the Act. It shall consist of at least three (3) members, one of whom is the attending veterinarian of the research facility and one of whom is
not affiliated in any way with the facility other than as a member of the committee, however, if the research facility has more than one Doctor of Veterinary Medicine (DVM), another DVM with delegated program responsibility may serve. The research facility shall establish the Committee for the purpose of evaluating the care, treatment, housing, and use of animals, and for certifying compliance with the Act by the research facility.

**Dealer.** any person who, in commerce, for compensation or profit, delivers for transportation, or transports, except as a carrier, buys, or sells, or negotiates the purchase or sale of: Any dog or other animal whether alive or dead (including unborn animals, organs, limbs, blood, serum, or other parts) for research, teaching, testing, experimentation, exhibition, or for use as a pet; or any dog at the wholesale level for hunting, security, or breeding purposes. This term does not include: A retail pet store, as defined in this section, unless such store sells any animal to a research facility, an exhibitor, or a dealer (wholesale); any retail outlet where dogs are sold for hunting, breeding, or security purposes; or any person who does not sell or negotiate the purchase or sale of any wild or exotic animal, dog, or cat and who derives no more than $500 gross income from the sale of animals other than wild or exotic animals, dogs, or cats during any calendar year.

**Department.** the U.S. Department of Agriculture

**Deputy Administrator.** the Deputy Administrator for Animal Care (AC) or any other official of AC to whom authority has been delegated to act in his stead

**Dog.** any live or dead dog (*Canis familiaris*) or any dog-hybrid cross

**DRA.** dry resting area

**Dwarf hamster.** any species of hamster such as the Chinese and Armenian species whose adult body size is substantially less than that attained by the Syrian or Golden species of hamsters

**Endangered species.** those species defined in the Endangered Species Act (16 U.S.C. 1531 et seq.) and as it may be subsequently amended

**Euthanasia.** the humane destruction of an animal accomplished by a method that produces rapid unconsciousness and subsequent death without evidence of pain or distress, or a method that utilizes anesthesia produced by an agent that causes painless loss of consciousness and subsequent death

**Exhibitor.** any person (public or private) exhibiting any animals, which were purchased in commerce or the intended distribution of which affects
commerce, or will affect commerce, to the public for compensation, as determined by the Secretary, and such term includes carnivals, circuses, and zoos exhibiting such animals whether operated for profit or not; but such term excludes retail pet stores, an owner of a common, domesticated household pet who derives less than a substantial portion of income from a nonprimary source (as determined by the Secretary) for exhibiting an animal that exclusively resides at the residence of the pet owner, organizations sponsoring and all persons participating in State and country fairs, livestock shows, rodeos, purebred dog and cat shows, and any other fairs or exhibitions intended to advance agricultural arts and sciences, as may be determined by the Secretary

**exotic animal.** any animal not identified in the definition of "animal" provided in this part that is native to a foreign country or of foreign origin or character, is not native to the United States, or was introduced from abroad. This term specifically includes animals such as, but not limited to, lions, tigers, leopards, elephants, camels, antelope, anteaters, kangaroos, and water buffalo, and species of foreign domestic cattle, such as Ankole, Gayal, and Yak

**farm animal.** any domestic species of cattle, sheep, swine, goats, llamas, or horses, which are normally and have historically, been kept and raised on farms in the United States, and used or intended for use as food or fiber, or for improving animal nutrition, breeding, management, or production efficiency, or for improving the quality of food or fiber. This term also includes animals such as rabbits, mink, and chinchilla, when they are used solely for purposes of meat or fur, and animals such as horses and llamas when used solely as work and pack animals

**Federal agency.** an Executive agency as such term is defined in section 105 of title 5, United States Code, and with respect to any research facility means the agency from which the research facility receives a Federal award for the conduct of research, experimentation, or testing involving the use of animals

**Federal award.** any mechanism (including a grant, award, loan, contract, or cooperative agreement) under which Federal funds are used to support the conduct of research, experimentation, or testing, involving the use of animals. The permit system established under the authorities of the Endangered Species Act, the Marine Mammal Protection Act, and the Migratory Bird Treaty Act, are not considered to be Federal awards under the Animal Welfare Act

**Federal research facility.** each department, agency, or instrumentality of the United States which uses live animals for research or experimentation
**field study.** a study conducted on free-living wild animals in their natural habitat. However, this term excludes any study that involves an invasive procedure, harms, or materially alters the behavior of an animal under study.

**FOIA.** Freedom of Information Act

**handling.** petting, feeding, watering, cleaning, manipulating, loading, crating, shifting, transferring, immobilizing, restraining, treating, training, working and moving, or any similar activity with respect to any animal

**housing facility.** any land, premises, shed, barn, building, trailer, or other structure or area housing or intended to house animals. Two different species or types of animals. Crosses between wild animal species, such as lions and tigers, are considered to be wild animals. Crosses between wild animal species and domestic animals, such as dogs and wolves or buffalo and domestic cattle, are considered to be domestic animals

**IACUC.** Institutional Animal Care and Use Committee

**ID.** identification

**IES.** Investigative and Enforcement Services

**ILA.** inspection and licensing assistant

**ILAR.** Institute for Laboratory Animal Research

**impervious surface.** a surface that does not permit the absorption of fluids. Such surfaces are those that can be thoroughly and repeatedly cleaned and disinfected, will not retain odors, and from which fluids bead up and run off or can be removed without their being absorbed into the surface material

**indoor housing facility.** any structure or building with environmental controls housing or intended to house animals and meeting the following three requirements: (1) It must be capable of controlling the temperature within the building or structure within the limits set forth for that species of animal, of maintaining humidity levels of 30 to 70 percent and of rapidly eliminating odors from within the building; and (2) It must be an enclosure created by the continuous connection of a roof, floor, and walls (a shed or barn set on top of the ground does not have a continuous connection between the walls and the ground unless a foundation and floor are provided); and (3) It must have at least one door for entry and exit that can be opened and closed (any windows or openings which provide natural light must be covered with a transparent material such as glass or hard plastic)
**interactive area.** that area in a primary enclosure for a swim-with-the-dolphin program where an interactive session takes place

**interactive session.** a swim-with-the-dolphin program session where members of the public enter a primary enclosure to interact with cetaceans

**intermediate handler.** any person, including a department, agency, or instrumentality of the United States or of any State or local government (other than a dealer, research facility, exhibitor, any person excluded from the definition of a dealer, research facility, or exhibitor, an operator of an auction sale, or a carrier), who is engaged in any business in which he receives custody of animals in connection with their transportation in commerce

**inspector.** any person employed by the Department who is authorized to perform a function under the Act and the regulations in 9 CFR parts 1, 2, and 3

**institutional official.** the individual at a research facility who is authorized to legally commit on behalf of the research facility that the requirements of 9 CFR Parts 1, 2, and 3 will be met

**IO.** Institutional Official

**isolation.** in regard to marine mammals means the physical separation of animals to prevent contact and a separate, noncommon, water circulation and filtration system for the isolated animals

**licensed veterinarian.** a person who has graduated from an accredited school of veterinary medicine or has received equivalent formal education as determined by the Administrator, and who has a valid license to practice veterinary medicine in some State

**licensee.** any person licensed according to the provisions of the Act and the regulations in 9 CFR Part 2

**LOW.** Letter of Warning (APHIS Form 7060)

**major operative procedure.** any surgical intervention that penetrates and exposes a body cavity or any procedure which produces permanent impairment of physical or physiological functions

**MHD.** minimum horizontal dimension

**minimum horizontal dimension (MHD).** the diameter of a circular pool of water, or in the case of a square, rectangle, oblong, or other shape pool, the
diameter of the largest circle that can be inserted within the confines of such a pool of water

**MM.** marine mammal

**mobile or traveling housing facility.** a transporting vehicle such as a truck, trailer, or railway car, used to house animals while traveling for exhibition or public education purposes

**NCI.** noncompliant item

**NHP.** nonhuman primate

**NIH.** National Institutes of Health

**nonconditioned animals.** animals which have not been subjected to special care and treatment for sufficient time to stabilize, and where necessary, to improve their health

**nonhuman primate.** any nonhuman member of the highest order of mammals including prosimians, monkeys, and apes

**NRC.** National Research Council

**OGC.** Office of the General Counsel

**OIG.** Office of Inspector General

**OLAW.** Office of Laboratory Animal Welfare—formerly OPRR

**operator of an auction sale.** any person who is engaged in operating an auction at which animals are purchased or sold in commerce

**outdoor housing facility.** any structure, building, land, or premise, housing or intended to house animals, which does not meet the definition of any other type of housing facility provided in the regulations, and in which temperatures cannot be controlled within set limits

**painful procedure.** any procedure that would reasonably be expected to cause more than slight or momentary pain or distress in a human being to which that procedure was applied, that is, pain in excess of that caused by injections or other minor procedures

**paralytic drug.** a drug which causes partial or complete loss of muscle contraction and which has no anesthetic or analgesic properties, so that the
animal cannot move, but is completely aware of its surroundings and can feel pain

**person.** any individual, partnership, firm, joint stock company, corporation, association, trust, estate, or other legal entity

**personally identifiable information (PII).** information that can be used to uniquely identify an individual. Examples include, social security number, place of birth, date of birth, mother’s maiden name, biometric record (such as fingerprint, iris scan, DNA), medical history information (including medical conditions and metric information, e.g. weight, height, blood pressure), criminal history, employment information to include ratings, disciplinary actions, performance elements and standards, financial information, credit card numbers, bank account numbers, security clearance history.

**pet animal.** any animal that has commonly been kept as a pet in family households in the United States, such as dogs, cats, guinea pigs, rabbits, and hamsters. This term excludes exotic animals and wild animals

**PI.** Principle Investigator

**positive physical contact.** petting, stroking, or other touching, which is beneficial to the well-being of the animal

**pound (shelter).** a facility that accepts and/or seizes animals for the purpose of caring for them, placing them through adoption, or carrying out law enforcement, whether or not the facility is operated for profit

**PPQ.** Plant Protection and Quarantine

**primary conveyance.** the main method of transportation used to convey an animal from origin to destination, such as a motor vehicle, plane, ship, or train

**primary enclosure.** any structure or device used to restrict an animal or animals to a limited amount of space, such as a room, pen, run, cage, compartment, pool, or hutch

**principal investigator.** an employee of a research facility, or other person associated with a research facility, responsible for a proposal to conduct research and for the design and implementation of research involving animals

**PRN.** pro re nata, as needed

**PVC.** program of veterinary care
**quorum.** a majority of the Committee members

**random source.** dogs and cats obtained from animal pounds or shelters, auction sales, or from any person who did not breed and raise them on his or her premises

**RBIS.** risk-based inspection system

**RD.** Regional Director

**registrant.** any research facility, carrier, intermediate handler, or exhibitor not required to be licensed under section 3 of the Act, registered pursuant to the provisions of the Act and the regulations in 9 CFR Part 2

**research facility.** any school (except an elementary or secondary school), institution, organization, or person that uses or intends to use live animals in research, tests, or experiments, and that (1) purchases or transports live animals in commerce, or (2) receives funds under a grant, award, loan, or contract from a department, agency, or instrumentality of the United States for the purpose of carrying out research, tests, or experiments: Provided, That the Administrator may exempt, by regulation, any such school, institution, organization, or person that does not use or intend to use live dogs or cats, except those schools, institutions, organizations, or persons, which use substantial numbers (as determined by the Administrator) of live animals the principal function of which schools, institutions, organizations, or persons, is biomedical research or testing, when in the judgment of the Administrator, any such exemption does not vitiate the purpose of the Act

**retail pet store.** any outlet where only the following animals are sold or offered for sale, at retail, for use as pets: Dogs, cats, rabbits, guinea pigs, hamsters, gerbils, rats, mice, gophers, chinchillas, domestic ferrets, domestic farm animals, birds, and coldblooded species. Such definition excludes: (1) Establishments or persons who deal in dogs used for hunting, security, or breeding purposes; (2) Establishments or persons exhibiting, selling, or offering to exhibit or sell any wild or exotic or other nonpet species of warmblooded animals (except birds), such as skunks, raccoons, nonhuman primates, squirrels, ocelots, foxes, coyotes, etc.; (3) Any establishment or person selling warmblooded animals (except birds, and laboratory rats and mice) for research or exhibition purposes; and (4) Any establishment wholesaling any animals (except birds, rats and mice). (5) Any establishment exhibiting pet animals in a room that is separate from or adjacent to the retail pet store, or in an outside area, or anywhere off the retail pet store premises

**SACS.** Supervisory Animal Care Specialist
sanctuary area. that area in a primary enclosure for a swim-with-the-dolphin program that is off-limits to the public and that directly abuts the buffer area

sanitize. to make physically clean and to remove and destroy, to the maximum degree that is practical, agents injurious to health SOP standard operating procedure

Secretary. the Secretary of Agriculture of the United States or his representative who shall be an employee of the Department

sheltered housing facility. a housing facility which provides the animals with shelter; protection from the elements; and protection from temperature extremes at all times. A sheltered housing facility may consist of runs or pens totally enclosed in a barn or building, or of connecting inside/outside runs or pens with the inside pens in a totally enclosed building

SPF. specific pathogen free

standards. the requirements with respect to the humane housing, exhibition, handling, care, treatment, temperature, and transportation of animals by dealers, exhibitors research facilities, carriers, intermediate handlers, and operators of auction sales as set forth in 9 CFR Part 3

state. a State of the United States, the District of Columbia, Commonwealth of Puerto Rico, the Virgin Islands, Guam, American Samoa, or any other territory or possession of the United States

study area. any building room, area, enclosure, or other containment outside of a core facility or centrally designated or managed area in which animals are housed for more than 12 hours

swim-with-the-dolphin (SWTD) program. any human-cetacean interactive program in which a member of the public enters the primary enclosure in which an SWTD designated cetacean is housed to interact with the animal. This interaction includes, but such inclusions are not limited to, wading, swimming, snorkeling, or scuba diving in the enclosure. This interaction excludes, but such exclusions are not limited to, feeding and petting pools, and the participation of any member(s) of the public audience as a minor segment of an educational presentation or performance of a show

TIN. taxpayer identification number

TRA. traveling-on-the-road site designation in ACIS
**transporting device.** an interim vehicle or device, other than man, used to transport an animal between the primary conveyance and the terminal facility or in and around the terminal facility of a carrier or intermediate handler

**transporting vehicle.** any truck, car, trailer, airplane, ship, or railroad car used for transporting animals

**USC.** United States Code

**USDA.** United States Department of Agriculture

**USDI.** United States Department of Interior

**weaned.** an animal has become accustomed to take solid food and has so done, without nursing, for a period of at least 5 days

**wild animal.** any animal which is now or historically has been found in the wild, or in the wild state, within the boundaries of the United States, its territories, or possessions. This term includes, but is not limited to, animals such as: Deer, skunk, opossum, raccoon, mink, armadillo, coyote, squirrel, fox, wolf

**wild state.** living in its original, natural, condition; not domesticated

**zoo.** any park, building, cage, enclosure, or other structure or premise in which a live animal or animals are kept for public exhibition or viewing, regardless of compensation
## Index

### A
- access
  - attempted inspection 2-16
  - refusal of inspection 2-20
- acquisition records
  - APHIS Form 7005 A-8
  - APHIS Form 7020 A-16
- computerized 5-2
- acronyms
  - Glossary-1
- admission fees 3-4, 4-58
- amended inspection report
  - correcting mistakes 3-35
- animal prize exhibitor inspection 4-4
- animal rides inspection 4-6
- animals
  - as prizes 4-4
  - circus and performing 4-67
  - in transit, traveling exhibitor 4-65
  - inspection procedure 3-5
  - petting zoo 4-31
  - photo shoot 4-36
  - races, traveling exhibitor 4-65
  - rides 4-6
- animals on hand
  - APHIS Form 7005 A-8
- annual report
  - guidance A-18
- appeals process
  - inspection 3-31
- application for license renewal A-7
- application for new license A-6
- appointment of IACUC 7-11
- attending veterinarian 6-2
  - approval for dogs and cats 6-4
  - approval for marine mammals 6-5
  - approval for nonhuman primates 6-4
  - approval for other animals 6-6
- responsibilities 6-3
- auction market inspection 4-8

### B
- barrier facility inspection 4-10
- biosafety measures
  - dogs and cats 3-5
  - elephants 3-5
  - general 2-3
  - macaques 3-5
  - other nonhuman primates 3-5
- blood sampling guidelines 4-20
- bribery reporting procedures 3-38, 3-39

### C
- cats
  - body condition assessment chart D-3
  - certification
    - random source class B dealer 4-46
  - change in class of license inspection 4-13
  - circus inspection 4-67
- citations
  - examples of 3-22
  - new NCI 2-7
  - class ‘A’ licensee 4-13
  - class ‘B’ licensee 4-13
  - class ‘C’ licensee 4-13
  - complaint
    - inspection 4-15
- compliant
  - NCI noted while off duty 3-19
- confiscation guidance
  - body condition charts D-2
  - chronic issues 8-20
  - criteria 8-4
  - guidelines and responsibilities 8-25
  - sample letters 8-30
- correction date
  - extension of 3-30
- cougars
  - body condition assessment chart D-4

### D
- dangerous animals
  - handling letter A-26
- dead animal parts inspection 4-17
- direct NCI
  - correction dates 2-10
  - examples B-2
  - guidance B-2
  - reinspection 2-10
- disposition records
  - APHIS Form 7006 A-10
  - APHIS Form 7006A A-12
  - APHIS Form 7020 A-16
  - APHIS Form 7020A A-17
  - computerized 5-2
- dogs
  - body condition assessment chart D-5
- dogs and cats
  - biosafety measures 3-5
  - records
    - computerized 5-2
    - required 5-4
- drive-through zoo inspection 4-23
Index

**E**
electronic communications 7-50
IACUC meetings 7-50

**elephants**
biosafety measures 3-5
inspector safety and etiquette 3-9
traveling exhibitor inspection 4-58

**equipment**
optional C-2
perimeter fence variance letter A-31
recommended C-1
special C-2
equipment for biosafety measures
elephants C-2
nonhuman primates C-2
euthanasia 6-12
acceptable methods of 6-13
as a means of veterinary care 6-13
unacceptable methods of 6-13
exemptions
pet store record keeping 4-31

**exercise**
traveling exhibitor 4-61

**exit interview** 2-12

**exotic animal**
in pet stores 4-30
traveling exhibitor 4-60

**extension of correction date** 3-30

**F**
facility
attempted inspection 2-16
IACUC inspection of 7-6
inspection of 3-3
inspection refusal 2-20
fees 3-4
focused inspection 3-26
FOIA (Freedom of Information Act)
complainant name 4-16
forms
APHIS Form 7002 A-2
APHIS Form 7003 A-7
APHIS Form 7003-A A-6
APHIS form 7006 A-10
APHIS Form 7006A A-12
APHIS Form 7011 A-13
APHIS Form 7011A A-14
APHIS form 7019 A-15
APHIS form 7020 A-16
APHIS form 7020A A-17
APHIS form 7023 A-18
four-part citation 6-20

**G**
gifts from licensees/registrant 3-39

**H**
harrassment or abuse 2-21
health certificate
dogs, cats, nonhuman primates 4-63
traveling exhibitor 4-63
hoof stock

**I**
IACUC
appointment of members 7-11
complaints or concerns 7-9
facility inspection 7-6, 7-17
inspection protocol review 7-28
membership 7-11
chairperson 7-12
general information 7-3
nonaffiliated member 7-13
veterinarian 7-13
protocol activity suspension 7-8
protocol review procedure 7-39
records 7-9, 7-44
records retention 7-48
surgical procedures 7-22
suspension of protocol activity 7-41
telecommunications for meetings 7-9

identification
dogs and cats A-30
pet store exemption 4-31
inactive research facility inspection 4-24
indirect noncompliance
correction date 3-29

inspection
animal prize exhibitor 4-4
animal rides 4-6
auction market 4-8
barrier facility 4-10
alternative methods 4-11
change in class of license 4-13
complaint 4-15
dead animal parts or serum blood dealer 4-17
drive-through zoo 4-23
inactive research facility 4-24
lion and tiger enclosures 4-26
pet store 4-30
petting zoo 4-31
photo shoot 4-36
prelicense 3-21
random source class B dealers 4-37
research facility operating a pound or shelter 4-47
routine 3-21
search 4-49
steps 2-3
traveling exhibitor 4-58

inspection report
airport 2-14
appeals process 3-31
correcting or amending 3-35
delivery 2-14
handwritten 2-13, 3-36
mistakes 3-33
signature 2-13

inspection reports
rescinding and amending 2-22

inspector safety and etiquette
elephants 3-9
hoof stock 3-11
non-domestic cats 3-9
### Index

- **nonhuman primates** 3-8
- **itinerary**
  - traveling petting zoo 4-34
  - traveling petting zoo guidance 4-35

### L
- **leopards**
  - body condition assessment chart D-7
- **letters**
  - handling of dangerous animals A-26
  - perimeter fence variance request A-31
- **license renewal** A-7
- **lions**
  - body condition assessment chart D-8

### M
- **macaques**
  - biosafety measures 3-5
- **marine mammal**
  - required dealer and exhibitor records 5-4
  - veterinary care 4-63
- **medications of special welfare concern** 6-15

### N
- **narratives**
  - examples 6-21
- **necropsy reports for marine mammals** 6-10
- **neuromuscular blockers** 7-33
- **new license** A-6
- **noncompliant item (NCI)**
  - correction date 3-29
  - correction time remaining 3-26
  - documenting 2-4
  - examples of citations 3-22
  - new 2-7
  - noted while off duty 3-19
  - repeat 3-26
- **non-domestic cats**
  - inspector safety and etiquette 3-9
- **nonhuman primates**
  - biosafety measures 3-5
  - inspector safety and etiquette 3-8
  - records required 5-5
- **nonregulated animals** 3-38

### O
- **official tag manufacturers** A-30
- **on the road inspection** 4-55
- **optional equipment and supplies** C-1

### P
- **pain and distress recognition** 6-16
- **painful/distressful procedures** 7-21
- **performing animals** 4-67
- **perimeter fence variance request letter** A-31
- **pet store inspection** 4-30
- **petting zoo inspection** 4-31
- **photo shoot inspection** 4-36
- **photographs** 2-15
- **pocket pets**
  - examples of 4-30
- **pound or shelter**
  - random source class B dealer 4-37
- **prelicense inspection** 2-18
  - dealers 2-19
  - exhibitors 2-19
- **prizes, animals as** 4-4
- **program of veterinary care (PVC)**
  - written instructions 6-7
  - program of veterinary care (PVC) form A-2
  - protective clothing 3-5
  - protocol review 7-28
  - antibody production 7-32
  - changes in protocols 7-41
  - consultants 7-40
  - food and water deprivation or restriction 7-32
  - neuromuscular blockers 7-33
  - notification 7-41
  - painful/distressful procedures 7-31
  - surgical procedures 7-34
  - teaching procedures 7-35
  - toxicity studies 7-35

### R
- **races, animal** 4-65
- **random source class B dealer**
  - certification 4-46
  - random source class B dealers
    - holding periods 4-38
    - inspection 4-37
    - inspection frequency 4-40
    - research facilities 4-37
  - random source definition 4-37
  - records
    - acquisition APHIS Form 7005 A-8
    - animal prize exhibitor A-4
    - animals on hand APHIS Form 7019 A-15
    - annual report 5-8
    - auction market 4-9
    - disposition APHIS Form 7006 A-10
    - disposition APHIS Form 7006A A-12
    - pet store 4-31
    - random source class B dealers 4-38
    - recommended dealer and exhibitor 5-5
    - recommended research facility 5-9
    - required dealer and exhibitor 5-4
    - required research facility 5-6
    - research facility animal 5-7
    - research facility IACUC records 5-6
    - research facility operating a pound or shelter 4-47
    - research facility personnel 5-7
    - traveling exhibitor 4-63
  - refusal of inspection 2-20
  - barrier facility 4-12
  - on search 4-53
  - regional director
    - variance requests
      - computerized records 5-2
      - perimeter fence A-31
  - regional office
    - microchip approval 5-3
    - research facility inspection 7-6
    - research facility operating a pound or shelter inspection 4-47
    - research facility protocol selection worksheet 7-57
  - risk based inspection system (RBIS) 2-16
  - routine inspection 3-21
S
safety
around dangerous animals 3-5
during inspection 2-3
equipment C-2
identify unsafe facility conditions 3-17
search inspection 4-49
begin licensing process 4-56
dealer or exhibitor 4-52
follow-up procedure 4-55
home base permanent site 4-57
on the road 4-55
post search procedures 4-53
research facility 4-52
serum blood dealer inspection 4-17
species specific typical signs of pain 7-38
state and territory identification codes A-33
surgeries and specialized surgical procedures 6-6, 6-19
surgical procedures 7-34
T
tag manufacturers A-30
teachable moments 2-5
teaching protocols 7-35
tigers
body condition assessment chart D-9
toxicity studies 7-35
tracebacks
conducting 4-39
random source B dealer 4-40
traveling exhibitor
animals that spend time underwater 4-62
baboons and chimps 4-61
camels 4-61
flying species 4-62
inspection 4-58
large cats 4-62
pygmy hippos 4-62
records 4-63
tethered hoof stock 4-62
U
unlicensed exhibitor on the road inspection 4-55
V
variance
computerized records 4-39
perimeter fence variance request letter A-31
veterinary care
required records for all regulated species 6-8
required records for dogs and cats 6-8
required records for marine mammals 6-9
required records for nonhuman primates 6-8
required records for traveling exhibitors 6-11
W
wild animals
exemption from photography 4-36
worksheets
research facility protocol selection 7-57
search for unlicensed activity A-20