The Animal Welfare Act requires that all licensed facilities have a system of identifying animals and keeping records of their acquisition and disposition.

By the end of this presentation you should be able to:
1. Describe the approved methods of identification under the AWA
2. Explain the proper way of completing APHIS Forms 7005 and 7006, including properly identifying animals on official forms
3. Describe the records required to be kept under the Animal Welfare Act and how long the records must be kept

There are specific requirements you must follow when identifying your animals. The following section will introduce you to those requirements.

All adult dogs at the facility must have official USDA identification. This includes the following dogs:
- Puppies 16 weeks old or older
- Dogs temporarily at the facility for breeding
- Personal pets used for breeding
- Intact personal pets not used for breeding, but housed with breeding dogs
- Spayed/neutered dogs housed in the kennel. Identification is not required if these animals are not housed in the kennel.
Class A licensees (breeders)
One of the following methods must be used to identify all live dogs and cats on licensed premises.

**Adult dogs and cats:**
- Official USDA tag affixed to a collar worn on the animal’s neck.
  - Acceptable collar materials include: leather or plastic, some chains may be acceptable, but must be approved by APHIS.
  - Unacceptable materials: Wire, elastic or sharp metal
- Legible tattoo – All tattoos must be approved by the Administrator
  - The procedure for approval and use of tattoos is described in Animal Care Policy 19
- Microchip – as approved by the Administrator. Animal Care Policy 13 describes the procedure for seeking approval to use microchips. (discussed below)

**Puppies and Kittens less than 16 weeks old:**
- An official tag
- A distinctive and legible tattoo or
- A plastic-type collar acceptable to the Administrator with the information from the official tag legibly placed on it
Unweaned puppies or kittens do not need to be individually identified while they are maintained as part of a litter with their dam in the same primary enclosure, as long as the dam is identified.

A cage card attached to the enclosure with the required information written on it

Unweaned puppies:
- Individual identification not needed when with dam and litter in same enclosure.

*Photo: C. Baldwin: ISU*

Weaned puppies can be identified with a cage card containing the required information (USDA + license number + individual dog number) when they are maintained as a litter. See Policy 20 for more information. You may also wish to include information such as the puppies’ date of birth and vaccination information on the cage card, for easy reference.


*Photo: A. Eaglin: USDA APHIS*
Class B Dealers shall identify all dogs on the premises as follows:

1. All live dogs held, purchased or acquired must be immediately identified with:
   - Official tag affixed to a collar worn around the animal’s neck, or
   - USDA approved tattoo, or
   - Microchip

2. If the animal is already identified by a tag or tattoo from another dealer or exhibitor:
   - The Class B dealer may continue to use the existing number or replace it with a new tag or tattoo. Both the old and the new identification numbers must be noted on purchase records. The new number is used in records of subsequent sales or transfers of the animal. (2.50 (b)(2))

3. Puppies or kittens less than 16 weeks of age must be identified by either:
   - An official tag
   - Tattoo, or
   - Plastic collar with official tag number legibly written

4. Unweaned puppies or kittens do not need to be individually identified while they are maintained as part of a litter with their dam in the same primary enclosure, as long as the dam is identified.

This section will introduce different types of official identification.

What are Microchips?
Microchips are small implantable chips that are implanted beneath a dog’s skin using a hypodermic needle. When a scanner is passed over the microchip, the microchip transmits a unique identification number. Microchips transmit data at different frequencies. This means that a scanner designed to read microchips manufactured by one company may not be able to read microchips made by another company. Universal microchip readers which can read different frequencies are available.

(Source: AVMA FAQs about microchipping of animals https://www.avma.org/KB/Resources/FAQs/Pages/Microchipping-of-animals-FAQ.aspx Updated July 30, 2013)

* Photo: Andrew Kingsbury: ISU*
Licensees who want to use microchips to identify their animals must have the use of microchips approved by USDA. Contact your Inspector for details regarding the process for obtaining approval for use of microchips. If you are applying for licensure and would like to use microchips to identify your animals, you may submit your request for approval of microchipping at the time you submit your application.

The following requirements must be met in order for the use of microchips to be approved:

- Microchips are placed in a standard anatomic location
- The microchip scanner is available to the Inspector and/or the licensee or the licensee’s designee accompanying the Inspector
- Animal identification records must indicate the microchip numbers, location in the animal and the name of the microchip manufacturer
- Any animal with a microchip that is transferred to another licensee/registrant must have an official tag or tattoo if the new owner does not have a compatible scanner

NOTE: Microchips made by different companies may be readable only with scanners designed to read that particular brand of microchip. Universal scanners that read several different brands of microchips are available.

### Official Tags

- Number assigned when license issued
- Receive number in mail with license certificate
- Licensees order tags
- List of some vendors available from USDA

Section 2.51 of the Animal Welfare Regulations contains information about official tags.

**Obtaining an Official Tag Number**

An official tag number for your facility will be assigned by USDA when the license is issued. You will receive your license number in the mail with your license.

**Sources of Tags**

Licensees are responsible for obtaining tags at their own expense from commercial tag manufacturers.

The USDA Regional Office maintains a list of some vendors known to produce acceptable tags. This information is available from your Inspector.

*Photo: M. Radel: USDA APHIS*

### Materials

- **Durable alloy:** brass, bronze or steel
- **Durable plastic**
- **Aluminum:** suitable thickness

**Materials** – Official tags must be made of a durable alloy such as brass, bronze, or steel, or durable plastic. Aluminum can be used as long as it is of a suitable thickness to be durable.
**Size and Shape** – Official tags shall be one of the following shapes:
Circular and not less than 1 1/4 in diameter
Oblong and flat, not less than 2 inches by ¾ inches and riveted to an acceptable collar.

**Information**
Each tag must have the following information embossed or stamped on it so the information is easily readable:
- The letters “USDA”
- Numbers identifying the State and dealer
- Numbers identifying the animal

Official tags must be serially numbered and used in numerical order. Each animal must have its own tag and number. The same number cannot be used on more than one animal. An official identification tag number cannot be used more than once in a 5 year period.

When plastic type collars are used to identify puppies less than 16 weeks old, these three pieces of information must be legibly written on the collar.

When cage cards are used to identify weaned litters of puppies, the card must include the required identification information: Licensee state and identification number, USDA and the individual animal number. For ease of recordkeeping, you may wish to include additional information about the puppy such as the puppy’s date of birth, the Dam’s identification information, vaccination record and the date the puppy will reach 8 weeks of age.

*Photo M. Radel: USDA APHIS*

**Lost Tags**
Licensees are responsible for keeping track of all official tags they acquire. If a tag is lost from a dog, the licensee must make a diligent effort to find the tag, reapply it to the animal and account for it in official records. If you cannot find the tag, affix a new tag on the animal. Make sure to record the new ID number on form 7005 for that animal.
### Slide 19

**Destroyed/Illegible Tags**

If tag is destroyed or becomes illegible:
- Affix a new tag on the dog
- Record the new tag number on Form 7005
- Keep old tag
  - One year after removal, or
  - Longer than one year if requested by APHIS official

### Slide 20

**Retention and Reuse**

Dogs that die or are euthanized
- keep tags for 1 year after death
- available for inspection
- dispose in a manner to prevent reuse
Do not reuse numbers for 5 years

When an animal is euthanized or dies, the official tag must be removed and kept for one year. The tag must be available for inspection upon request.

When disposing of tags after the required retention period, the tags must be disposed of in a manner that prevents their reuse for identification.

No identification number may be reused within a 5 year period.

### Slide 21

**Collars**

Acceptable:
- Leather, plastic, some chain

NOT ACCEPTABLE:
- Wire, elastic, sharp metal

Collars need to be made of a material approved in the regulations. Acceptable materials include: leather, plastic, nylon and some chain. Unacceptable materials include: wire, elastic (including rubber bands) and sharp metal.

If you have questions, ask your Inspector.

### Slide 22

**Records**

Next we will discuss the record keeping of animal identification.
Any time a dog is transported, sold, euthanized, traded or otherwise disposed of, the licensee must make a record of the event. Records also need to include offspring born to any animal under the licensee’s control.

The AWA Regulations require licensees to use APHIS Form 7005: Record of Acquisition of Dogs and Cats on Hand and APHIS Form 7006: Record of Disposition of Dogs and Cats on Hand to record information about animals on their premises.

Inspectors carry a limited supply of blank forms. You can also order forms from USDA APHIS.

Link to Animal Care Forms on the web:

If a licensee uses a computerized recordkeeping system and believes that Forms 7005 and 7006 are unsuitable for use with the system, the licensee may request a variance from the Animal Care Office to waive the requirement to use Forms 7005 and 7006. The variance request must contain a written statement explaining why the official forms are not suitable for making and keeping records and a statement describing the alternate system proposed by the licensee. APHIS will make a determination on the request and notify the licensee of the decision.

Each dealer must seek a variance if they desire to use forms other than APHIS 7005 and 7006. You cannot use an alternate form without applying for a variance from USDA, even if someone else has received a variance for the form.

If you would like to use a computerized recordkeeping system, you can check with the Animal Care office to see if the system meets requirements. License applicants may submit a request for variance with their license application. NOTE: If asked, we are aware of one system: EZ Kennels Plus. Other systems may also meet requirements. Contact the Animal Care Office if you have questions.

Proper completion of APHIS Forms 7005 and 7006 is an important part of the compliance with the AWA standards and regulations. Errors in recording data on these forms are frequently found during inspections. This section highlights some of the common errors Inspectors find when reviewing licensees’ records and discusses how to avoid making these mistakes.

Remember: Records need to be kept current. Compliance inspections are unannounced, so it is a good practice to update your records on a regular basis when dogs are added or removed from your facility.
This is APHIS Form 7005. It is used to record the acquisition of dogs at a licensed facility. In the next section we are going to highlight some of the sections of the form where Inspectors commonly see errors.

One of the main errors seen is the failure to complete the entire form. The regulations require that this form be used, so it is very important that all the information is correctly entered on the form and that all acquisitions of animals are recorded as soon as possible.

The highlighted box is the **USDA License or Registration Number**: You must enter your USDA license number here. If you are completing the form during the prelicense inspection process you will not have a license number, so you may leave this blank. Once you receive your license be sure to fill in the number.

**Block A: Tattoo or USDA Tag Number**
Make sure you record the correct number here. If using microchips, the microchip number goes in this box.

**Block D: Age or Date of Birth**
Use the animal’s date of birth instead of age, if possible. By using the actual date of birth, you will not have to update the record annually as the dog gets older.
### Acquisition Information

Name, address, USDA license number OR driver’s license number and state, vehicle license number and state. If not available, at least 2 of the following:
- SSN, phone number, directions to premises, official ID card number

#### Block I: Animal Acquired From

This block requires information about the source of an animal. Be sure to provide the complete name and address and USDA license or registration number (if the person is licensed) of the person from whom you receive the animal. If the person is not a USDA licensee you must provide the person’s driver’s license number and state, vehicle license number (License plate number) and state. If the person’s driver’s license number and vehicle license number cannot be obtained, do the following:

- Indicate why the information was not available.
- Collect at least Two of the following:
  - Social security number
  - A valid working phone number
  - Directions to the individual’s premises
  - Official identification card number

### Disposition

For animals no longer on premises.

- Box K: indicate “died” or “euthanized”

#### Blocks J and K: Disposition

These blocks are used to record information about animals that are no longer on the premises. If the animal is sold, traded, or given away, enter the date in Block J. If the animal has died or been euthanized, specify “died” or “euthanized”, and be sure to include the date in which the animal died. Boxes “D” or “E” can be used if you have space issues.

### Next we will talk about APHIS Form 7006.

This form needs to be completed every time an animal is sold, exchanged or transferred or donated. This includes situations where animals are given away/traded, sold, or transferred to a rescue. This form must be completed each time a dog (adult or puppy) is sold/transferred or given to someone else.

Again, one of the most common mistakes is not fully completing the form. Double check forms to make sure all the boxes are completed.
Block 1: Date of Disposition
This is the date the animals were transferred.

Block 3A: Seller’s (Dealer’s) License number
Block 4A: Buyer’s License number:
Be sure to include your license number and the buyer’s USDA license number. Some buyers may not have USDA licenses. In that case box 4A can be left blank.

Block 5A: Identification number of individual animals:
Make sure the official identification number for each animal is entered on the form. This includes USDA Official Tags, tattoos or microchips.

Block 5D: Age or Date of Birth
Either the age or date of birth can be entered here. Entering the date of birth will aid in demonstrating that puppies are old enough to be sold.

Block 7: Name and Address of Company or Firm
Be sure to include complete information about the company transporting the dogs. If dogs are being sent by air, include the name of the airline and the airport from which the dogs are being shipped. If being sent another way, the address of the company must be included. If available, also include the waybill number.

Block 8: Name and Business Address of Truck Driver
If the dogs are being sent by truck, you must include the name and business address of the person driving the freight truck.

Next we will go through some examples of proper Form completion.
Example 1:
Fred Adams breeds Pugs, Beagles and Puggles and sells them to brokers and other breeders. He holds a Class A USDA license. He maintains information on the animals at his facility on APHIS Form 7005.

Fred maintains information on APHIS Form 7005. Here is his most recent APHIS Form 7005
Review information:
First dog on form was acquired on 12/20/2001: Male pug with a microchip. From Pauline’s Pugs – a licensed breeder. This dog was euthanized on 4/12/10
Second dog: Male Beagle acquired 11/3/2005 from Ben’s Beagles: a licensed breeder. This dog was removed/sold on 6/6/10
Third dog: Female beagle pug cross (puggle) note that 2 dominant breeds are indicated in box F. This dog was born on the premises. It died on 8/3/10
Fourth dog: Female Beagle acquired on 6/12/10 from John Smith – he is not a USDA licensee. Note the information required: State driver’s license number and state vehicle license number

Example 2
On June 6, Mr. Adams sells 3 puggle puppies to Paul’s Puppies. Mr. Adams uses microchips to identify his dogs. He completes APHIS Form 7006 listing each dog on the form. Paul from Paul’s Puppies picks up the puppies at Mr. Smith’s facility.

See 7006 for example 1
Copy of the completed form will be used with this slide. Inspectors can use this slide to begin a discussion about completing the form.

Here is the APHIS Form 7006 Mr. Smith completed. Note that he uses microchips to identify his animals. Information about Paul is listed in box 7
Example 3

Mr. Smith trades a puggle puppy with Ms. Walker, a licensed dealer in Oregon. The puppy will be shipped on American Airlines. Mr. Smith will take the dog to the airport.

Form 7006

Here is the APHIS Form 7006 Mr. Smith completed for the puppy he is sending to Ms. Walker in Oregon. Note Box 7 which indicates the name of the airline and airport.

Record Retention Requirements

You are required to keep records for a set amount of time. Next we will discuss those retention requirements.

Recordkeeping

Dealers must keep records and forms documenting information on the acquisition, disposition, birth and death of regulated animals.

A licensee must keep records on all animals which are:

- Purchased or otherwise acquired (e.g., acquired through donation or exchange)
- Owned
- Held
- In possession or control
-Transported
- Euthanized
- Sold or otherwise disposed of
- Offspring of animals in licensee’s possession or control
- On premises for breeding purposes
- Personal pets housed at licensed facility
- Animals on the premises for breeding purposes
- Personal pets housed at the animal facility
How Long do I Keep Records?

- 1 year after animal euthanized, dies or otherwise disposed of
- Longer period if notified by the Administrator

Records required to be kept under the AWA regulations must be kept for 1 year after an animal is euthanized, dies or is otherwise disposed of. The records may be required to be kept for a longer period if the Administrator notifies the licensee that the records need to be retained pending the completion of an investigation or proceeding under the AWA. In that case, the licensee must hold the records until the Administrator authorizes their disposition.

Conclusion

This segment has reviewed policies and procedures for identifying and keeping records on dogs at licensed facilities. Specifically, this segment has discussed:

1. The approved methods of identifying dogs under the AWA.
2. The proper way of completing APHIS Forms 7005 and 7006, including properly identifying animals on official forms
3. The records required to be kept under the Animal Welfare Act and how long the records must be kept.

Questions?

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