



Animal and Plant
Health Inspection
Service

Animal Care
4700 River Road
Riverdale, MD 20737

May 10, 2018

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

I hope this message finds you well. I would like to provide you with an update on efforts to align HPA inspection processes and findings to ensure consistency of inspections whether conducted by the U.S. Department of Agriculture (USDA) or DQPs licensed by USDA-certified HIOs.

Soon after becoming the Deputy Administrator, members of the industry conveyed to me the need for greater clarity around the inspection process so exhibitors know exactly what to expect when they present a horse for HPA compliance inspection. For the past 16 months, we have focused on providing the industry with [clear guidance on the inspection process](#), and partnering with HIOs to [improve the consistency in inspection findings among DQPs and USDA Veterinary Medical Officers \(VMO\)](#).

As a result of these efforts, my expectation, which I first is stated in my [June 2017](#) letter, is that neither you nor I should see any differences among USDA and DQP inspections or in the thoroughness of DQP inspections when USDA is not present at an event. I also set a performance goal to eliminate any difference in DQP inspection findings when USDA is or is not present at an event. We've monitored progress in this area and, between October 1, 2017, and March 31, 2018, our VMOs attended 16 HPA events in 10 different states to observe DQP performance and inspect horses for HPA compliance. I want to share the [HIO Summary Inspection Data](#) we compiled for this period.

Although the HIO Summary Inspection Data covers a limited number of shows and we remain in the early part of the show season, it demonstrates that despite our ongoing efforts, the vast majority of HIOs that inspect padded horses did not detect any HPA noncompliance when USDA was not present at a show. From October 2017 to March 2018, there was only one HIO that inspects padded horses for HPA compliance that detected noncompliance while USDA was not present at show – S.H.O.W. Inc. At the USDA and HIO joint training in February 2018, I noted, from a statistical perspective, it is highly unlikely that exhibitors only present noncompliant horses for inspection when USDA is present at a horse show. In fact, in our experience, when USDA arrives at an HPA-covered event and exhibitors are concerned about whether their horses are HPA compliant, they simply pack up their trailers and leave the show. In short, I remain very concerned about HIOs, especially those inspecting padded horses, whose rate of noncompliance is zero when USDA is not present, or are markedly different when USDA is not present.

To mitigate these concerns, USDA will continue to:

- Focus its resources on attending events affiliated with HIOs that detected zero or very few HPA noncompliances when inspecting padded and flat shod classes when USDA was not present.

- Select additional horses for inspection when attending events with DQPs whose performance varies depending on whether USDA is present to better understand the true rate of noncompliance at these events and assess future performance.
- Refer back to the DQP any horse for which USDA detects an HPA noncompliance to provide a platform for continued learning and discussion.

To achieve our common goals of ending the practice of soring horses and promoting fair competition, it is essential that HIOs commit to fulfilling their HPA responsibilities and licensed DQPs follow a consistent and thorough inspection process. We will continue to provide you with updates as we track our performance goal of improving alignment between USDA and DQP inspection findings.

Very truly,

Bernadette Juarez
Deputy Administrator
Animal Care