

SOP for Remote Pre-License Inspections

USDA APHIS Animal Care – October 21, 2020

Purpose: To outline the procedures for completing pre-license inspections remotely.

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Conducting Remote Pre-License Inspections:

The following provides the steps for conducting a remote pre-license inspection.

- I. The inspector will determine the color of the county (per the USDA COVID-19 maps) in which the applicant resides.
 - a. If the county is **green**, the inspector will schedule a face-to-face pre-license inspection in accordance with established guidelines – updated to reflect the need to decrease the time spent on-site by conducting the enhanced pre-license training and PowerPoint presentations remotely.
 - i. The inspector must check with the applicant to determine the best way to present the PowerPoint presentations prior to the pre-license inspection.
 - ii. Approved options for delivering the PowerPoint presentations to the applicant include:
 - Via Skype, Microsoft Teams, Zoom, Facetime
 - Via Email
 - Providing a thumb drive loaded with all the presentations (ensure the applicant has the equipment required to access the presentations)
 - For those without access to the above technology options:
 - Presentations can be printed and mailed to the applicant
 - Once received the presentations should be discussed via telephone
 - b. If the county is **grey or purple**, the inspector will follow the remote guidance as follows:
 - i. The inspector will:
 - Contact the applicant
 - Determine the applicant’s abilities to conduct a virtual inspection via live video streaming
 - Determine the best way to deliver the pre-license presentation slides and training material
 - Ask the applicant the following questions:

- Have there been any changes to the business (Program of Veterinary Care – PVC, animal inventory, facilities, etc)?
- Have there been any incidents at the facility?
- Is there anything to report regarding USDA regulated activity conducted to this point?
- Schedule a call to deliver the pre-license presentations
- Deliver the enhanced pre-license training material and presentations virtually via telephone, Microsoft Teams, Skype, Zoom, Facetime or another live streaming platform suitable to both parties. The presentations applicable to the business being conducted should be presented. Once the presentations have been presented, the inspector and the applicant should schedule a time for the pre-license inspection.
 - The inspector should notify the applicant that the remote inspection may take additional time due to the potential difficulty with technology.
 - The inspector may offer to do a test run with the chosen platform prior to performing the inspection to work out any technical issues.
- If the county remains grey or purple, the inspector should conduct the pre-license inspection remotely and follow the guidance outlined below for the inspection process and completion of the inspection report.

Remote Pre-License Assessment Process:

I. Pre-License Phone Call

- Call the applicant to schedule a pre-license inspection
- Schedule the virtual presentation of training materials and PowerPoint slides
- Contact a Supervisory Animal Care Specialist (SACS) if the facility may be a problematic or a difficult Failure to Renew (FTR) facility
- Inquire as to the applicant's access to:
 - Live video streaming applications (ie Microsoft Teams, Skype, Zoom, Facetime)
 - Internet capability
 - And a handheld video device to use during the inspection process
- Follow the pre-license protocol
- Inform the applicant of the following:
 - The call to present the training materials and presentations may take one to two hours
 - All required documents should be readily available for inspection (provide a list of the documents required by the applicant) and that all animal areas and support facilities will need to be viewed on the remote pre-license inspection
 - Passing a pre-license inspection is required to conduct USDA regulated activities
 - Two people may be needed during the inspection, depending on the facility – one to hold the handheld video device and one to handle animals for inspection

II. Conduct a Remote Inspection of Records, Animals, and the Facility

(Refer to Appendix 1 for checklist)

Note: DO NOT fill out the checklist; it is for guidance only.

a. 1st Remote Pre-License Inspection:

- Perform a complete and thorough inspection based on the pre-license guidance and the checklist (Appendix 1)
- The applicant will need to show the inspector:
 - All animals, animal enclosures (indoor and outdoor), and shelters
 - Food, food preparation areas and food/bedding storage areas
 - Medical and vaccination supplies and storage areas
 - Food and water receptacles
 - All sides of the buildings and areas housing animals to include the floors and ceilings
 - Any other items/areas relating to the husbandry of the animals at the facility

b. 2nd Remote Pre-License Inspection:

- Can be scheduled at the time of the 1st pre-license inspection or when the applicant is ready, the applicant may contact the inspector
- Use the same process as the 1st pre-license inspection

c. 3rd Remote Pre-License Inspection:

- Ensure the applicant understands there are three pre-license inspections allowed to demonstrate compliance with the Animal Welfare Act Regulations and Standards in a 90-day period
- To be conducted in-person unless not possible due to COVID

III. Inspection Results

a. Compliant Facility:

- Verify accuracy of the application with the applicant
- Conduct an exit briefing with the applicant and deliver the inspection report via the applicant's preferred method – email or certified mail
- Include the following statement on the inspection report
 - No non-compliant items identified during this inspection.*
 - An exit briefing was conducted with the applicant.*
 - This (1st/2nd/3rd) pre-license inspection is for a Class ("A"/"B"/"C") license.*

Conducting regulated activities without a valid USDA license is a violation of the Animal Welfare Act.

- Include any additional notes as needed, such as: identification explained, paperwork explained, electronic records discussed, etc

b. Non-compliant facility:

If the 1st or 2nd pre-license inspection results in one or more non-compliant items:

- Inform the applicant that the final exit briefing will be conducted within two business days
- Prepare an inspection report citing all non-compliances
- Complete and distribute the inspection report to all inspectors involved prior to conducting the exit briefing with the applicant
- Conduct an exit briefing with the applicant and ensure the applicant understands that there are 90 days to achieve full compliance and complete the pre-license process
- Remind the applicant that it is the responsibility of the applicant to contact the inspector to schedule the next pre-license inspection
- Include the following statements (or something similar) on the inspection report:

An exit briefing was conducted with the applicant.

Conducting regulated activities without a valid USDA license is a violation of the Animal Welfare Act.

All items must be in compliance within (2/1) more inspection(s) or by (date – 90 days counted from 1st pre-license inspection) or the applicant will forfeit the application fee and must wait 6 months to reapply.

If 3rd pre-license inspection results in one or more non-compliant items:

- Prepare the inspection report citing all non-compliant items, plus use 2.3(b) to indicate failure to come into compliance on the third pre-license inspection.
- Include the following statements (or something similar):

An exit briefing was conducted with the applicant.

Conducting regulated activities without a valid USDA license is a violation of the Animal Welfare Act.

The applicant will forfeit the application fee and must wait 6 months from (insert date of failed 3rd pre-license inspection) to reapply.

Reminders About Conducting Pre-License Inspections:

- All pre-license inspections must be completed using this protocol.
- All pre-license inspections must be thorough and complete.
- There are no focused pre-license inspections.
- Teachable moments cannot be issued during a pre-license inspection.
- All remote pre-license inspection reports should be delivered via email or certified mail. (Discuss any extenuating circumstances with a SACS).
- Training materials and PowerPoint presentations should be completed prior to conducting an inspection of the facility, and whenever deemed appropriate during the pre-license process to help clarify any issues found during the inspection.
- Discuss optimal hours with the applicant and record the days/times in the comments section of the Animal Care database.

Contacting Applicants

I. Calling an Applicant

Below is a script that will help provide assistance when contacting an applicant

“Hello, this is _____. I’m calling to set up a pre-license inspection. Do you have a few minutes to speak with me?”

If Yes:

“We are currently conducting virtual pre-license inspections. I’d like to discuss scheduling the inspection. It is important that we get a pre-license inspection scheduled soon because you are able to conduct regulated activities without a license.”

If No:

“When, in the near future, would you be available for a call? (Note: Do your best to schedule a specific day and time for the next call.) It is important that we get a pre-license inspection scheduled soon because you are not able to conduct regulated activities without a license.”

II. Contacting an Applicant without Access to the Internet and/or phone

a. Applicant Representative with a phone

“Hello, this is _____.” Back to the original script

b. No Answer – Voicemail

“Hello, this is _____.” Leave information for the applicant to return your call.

Any question or concerns should be directed to a SACS.

**** This SOP will be reviewed every 3 months, and sunset when conditions no longer require the use of virtual inspections.***

Appendix 1 Remote Pre-License Inspection Process Checklist

Licensee/Facility Name: Click here to enter text.				Date of Remote Inspection: Click here to enter a date.																
CID: Click here to enter text.				Inspector: Click here to enter text.																
Click here to enter text.				SACS: Click here to enter text.																
Standards & Regulations				DOGS		CATS		GUINEA PIGS		HAMSTERS		RABBITS		PRIMATES		MARINE MAMMALS		ALL OTHER SPECIES		
FACILITIES	GENERAL	Structure & Condition		3.1	<input type="checkbox"/>	3.1	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.50	<input type="checkbox"/>	3.75	<input type="checkbox"/>	3.101	<input type="checkbox"/>	3.125	<input type="checkbox"/>	
		Condition & Site		3.1	<input type="checkbox"/>	3.1	<input type="checkbox"/>							3.75	<input type="checkbox"/>	3.101	<input type="checkbox"/>			
		Surfaces & Cleaning		3.1	<input type="checkbox"/>	3.1	<input type="checkbox"/>								3.75	<input type="checkbox"/>	3.101	<input type="checkbox"/>		
		Utilities/Washroom/Storage		3.1	<input type="checkbox"/>	3.1	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.50	<input type="checkbox"/>	3.75	<input type="checkbox"/>	3.101	<input type="checkbox"/>	3.125	<input type="checkbox"/>	
		Drainage & Waste Disposal		3.1	<input type="checkbox"/>	3.1	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.50	<input type="checkbox"/>	3.75	<input type="checkbox"/>	3.101	<input type="checkbox"/>	3.125	<input type="checkbox"/>	
	INDOOR	Temperature/Ventilation/Lighting		3.2	<input type="checkbox"/>	3.2	<input type="checkbox"/>	3.26	<input type="checkbox"/>	3.26	<input type="checkbox"/>	3.51	<input type="checkbox"/>	3.76	<input type="checkbox"/>	3.102	<input type="checkbox"/>	3.126	<input type="checkbox"/>	
		Interior Surfaces		3.2	<input type="checkbox"/>	3.2	<input type="checkbox"/>	3.26	<input type="checkbox"/>	3.26	<input type="checkbox"/>	3.51	<input type="checkbox"/>			3.101	<input type="checkbox"/>			
		Drainage														3.101	<input type="checkbox"/>	3.126	<input type="checkbox"/>	
	SHELTERED	Temperature/Ventilation/Lighting		3.3	<input type="checkbox"/>	3.3	<input type="checkbox"/>							3.77	<input type="checkbox"/>					
		Shelter from elements		3.3	<input type="checkbox"/>	3.3	<input type="checkbox"/>								3.77	<input type="checkbox"/>				
		Surfaces		3.3	<input type="checkbox"/>	3.3	<input type="checkbox"/>													
		Capacity/Perimeter fence/Barrier													3.77	<input type="checkbox"/>				
	OUTDOOR	Restrictions or Acclimation		3.4	<input type="checkbox"/>	3.4	<input type="checkbox"/>	3.27	<input type="checkbox"/>	3.27	<input type="checkbox"/>			3.78	<input type="checkbox"/>	3.103	<input type="checkbox"/>			
		Shelter from elements		3.4	<input type="checkbox"/>	3.4	<input type="checkbox"/>	3.27	<input type="checkbox"/>			3.52	<input type="checkbox"/>	3.78	<input type="checkbox"/>	3.103	<input type="checkbox"/>	3.127	<input type="checkbox"/>	
		Drainage						3.27	<input type="checkbox"/>			3.52	<input type="checkbox"/>					3.127	<input type="checkbox"/>	
		Construction		3.4	<input type="checkbox"/>	3.4	<input type="checkbox"/>	3.27	<input type="checkbox"/>					3.78	<input type="checkbox"/>	3.101	<input type="checkbox"/>			
		Capacity/Perimeter fence/Barrier												3.78	<input type="checkbox"/>	3.101	<input type="checkbox"/>	3.125	<input type="checkbox"/>	
	MO-BILE	Temperature/Ventilation/Lighting		3.5	<input type="checkbox"/>	3.5	<input type="checkbox"/>							3.79	<input type="checkbox"/>					
Public Barrier												3.79	<input type="checkbox"/>							
PRIMARY ENCLOSURE	General Requirements		3.6	<input type="checkbox"/>	3.6	<input type="checkbox"/>	3.28	<input type="checkbox"/>	3.28	<input type="checkbox"/>	3.53	<input type="checkbox"/>	3.80	<input type="checkbox"/>	3.104	<input type="checkbox"/>	3.125	<input type="checkbox"/>		
	Space & Additional Requirements		3.6	<input type="checkbox"/>	3.6	<input type="checkbox"/>	3.28	<input type="checkbox"/>	3.28	<input type="checkbox"/>	3.53	<input type="checkbox"/>	3.80	<input type="checkbox"/>	3.104	<input type="checkbox"/>	3.128	<input type="checkbox"/>		
	Protection from Predators		3.6	<input type="checkbox"/>	3.6	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.25	<input type="checkbox"/>	3.52	<input type="checkbox"/>	3.80	<input type="checkbox"/>	3.101	<input type="checkbox"/>	3.125	<input type="checkbox"/>		
ANIMAL HEALTH & HUSBANDRY	Exercise & Socialization		3.8	<input type="checkbox"/>																
	Environment Enhancement												3.81	<input type="checkbox"/>						
	Feeding		3.9	<input type="checkbox"/>	3.9	<input type="checkbox"/>	3.29	<input type="checkbox"/>	3.29	<input type="checkbox"/>	3.54	<input type="checkbox"/>	3.82	<input type="checkbox"/>	3.105	<input type="checkbox"/>	3.129	<input type="checkbox"/>		
	Watering		3.10	<input type="checkbox"/>	3.10	<input type="checkbox"/>	3.30	<input type="checkbox"/>	3.30	<input type="checkbox"/>	3.55	<input type="checkbox"/>	3.83	<input type="checkbox"/>	3.106	<input type="checkbox"/>	3.130	<input type="checkbox"/>		
	Cleaning & Sanitization		3.11	<input type="checkbox"/>	3.11	<input type="checkbox"/>	3.31	<input type="checkbox"/>	3.31	<input type="checkbox"/>	3.56	<input type="checkbox"/>	3.84	<input type="checkbox"/>	3.107	<input type="checkbox"/>	3.131	<input type="checkbox"/>		
	Housekeeping & Pest Control		3.11	<input type="checkbox"/>	3.11	<input type="checkbox"/>	3.31	<input type="checkbox"/>	3.31	<input type="checkbox"/>	3.56	<input type="checkbox"/>	3.84	<input type="checkbox"/>	3.107	<input type="checkbox"/>	3.131	<input type="checkbox"/>		
	Employees		3.12	<input type="checkbox"/>	3.12	<input type="checkbox"/>	3.32	<input type="checkbox"/>	3.32	<input type="checkbox"/>	3.57	<input type="checkbox"/>	3.85	<input type="checkbox"/>	3.108	<input type="checkbox"/>	3.132	<input type="checkbox"/>		
	Social Grouping & Separation		3.7	<input type="checkbox"/>	3.7	<input type="checkbox"/>	3.33	<input type="checkbox"/>	3.33	<input type="checkbox"/>	3.58	<input type="checkbox"/>			3.109	<input type="checkbox"/>	3.133	<input type="checkbox"/>		
TRANSPORTATION	Primary Enclosure		3.14	<input type="checkbox"/>	3.14	<input type="checkbox"/>	3.36	<input type="checkbox"/>	3.36	<input type="checkbox"/>	3.61	<input type="checkbox"/>	3.87	<input type="checkbox"/>	3.113	<input type="checkbox"/>	3.137	<input type="checkbox"/>		
	Primary Conveyance		3.15	<input type="checkbox"/>	3.15	<input type="checkbox"/>	3.37	<input type="checkbox"/>	3.37	<input type="checkbox"/>	3.62	<input type="checkbox"/>	3.88	<input type="checkbox"/>	3.114	<input type="checkbox"/>	3.138	<input type="checkbox"/>		
	Food & Water		3.16	<input type="checkbox"/>	3.16	<input type="checkbox"/>	3.38	<input type="checkbox"/>	3.38	<input type="checkbox"/>	3.63	<input type="checkbox"/>	3.89	<input type="checkbox"/>	3.115	<input type="checkbox"/>	3.139	<input type="checkbox"/>		
	Care in Transit		3.17	<input type="checkbox"/>	3.17	<input type="checkbox"/>	3.39	<input type="checkbox"/>	3.39	<input type="checkbox"/>	3.64	<input type="checkbox"/>	3.90	<input type="checkbox"/>	3.116	<input type="checkbox"/>	3.140	<input type="checkbox"/>		
	Handling during Transportation		3.19	<input type="checkbox"/>	3.19	<input type="checkbox"/>	3.41	<input type="checkbox"/>	3.41	<input type="checkbox"/>	3.66	<input type="checkbox"/>	3.92	<input type="checkbox"/>	3.118	<input type="checkbox"/>	3.142	<input type="checkbox"/>		
ALL OTHER ITEMS- ALL SPECIES	Identification		2.50	<input type="checkbox"/>																
	Records & Holding Period		2.75-2.78	<input type="checkbox"/>			2.101	<input type="checkbox"/>	2.132	<input type="checkbox"/>	2.133	<input type="checkbox"/>								
	Handling		2.131	<input type="checkbox"/>																
	Veterinary Care		2.40	<input type="checkbox"/>																
	Other		Click here to enter text.																	