

ADVANCING ANIMAL DISEASE TRACEABILITY ROAD MAP FOR MONTANA

A Three-Year Plan

Submitted by:

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I. EXECUTIVE SUMMARY

In advancing animal disease traceability, Montana has two primary goals:

- 1) Increasing the amount of traceability data that is captured and stored electronically and is therefore searchable.
- 2) Improve our ability to manage traceability data by increasing the use of electronic records and reporting, advocating for consistency and compatibility of electronic systems, and streamlining the data management process.

These goals will be accomplished by improving contact with and education of both industry and accredited veterinarians to ensure that information sharing is complete and efficient and by continuing to improve internal efficiencies aimed at the electronic capture of traceability data.

Record of official identification device distribution will be funneled into MDOL's Animal Health software USAHerds that will provide the foundation for traceability data in Montana. USAHerds provides a single uniform resource that can be accessed by Animal Health personnel 24-7 to look up traceability data. Beginning in 2022, USAHerds will provide basic tag sighting information to USDA's AHER system to improve overall traceability. MDOL will also utilize USDA APHIS VS's CoreOne software, our state's brands software programs, and other existing USDA databases (EMRS2, AINMS, Allocator, etc....) to complement our state's traceability system. MDOL utilizes a modified .75FTE for the entry of traceability data into animal health databases.

MDOL will continue to explore electronic data capture systems for official disease work, including testing, vaccination, and issuance of certificates of veterinary inspection. MDOL will provide support to industry for the adoption of these systems to facilitate reporting of captured data in a standardized format, consistent with the current USAHA XML standard. Additionally, MDOL has placed an emphasis on systems that directly integrate with our current animal health software. MDOL would also like to see better integration between USDA systems and state animal health software programs. Specifically, communication between CoreOne, EMRS2, and state systems would greatly benefit traceability efforts.

MDOL and MT USDA APHIS VS are working together on a coordinated effort to ensure that the maximum amount of data can be efficiently captured without duplication between the two offices.

Additionally, MDOL will continue to rely upon our state brand program to trace animals within Montana. This is accomplished through several avenues. Brand inspections conducted in-the-field, online, and at livestock markets are the core of the program. Brand inspections conducted at Montana livestock markets are currently entered real-time into a brand software program that reconciles buyers and sellers and allows MDOL to query brand records for animal health purposes. Brand inspectors capture animal health information, at the time of inspection. This

allows more effective traceback of animals that have moved through livestock markets in Montana and will also allow more detailed information to be captured on specific groups of animals. For example, animals that originate from the Designated Surveillance Area can be checked in individually using official individual identification versus lot check-in under a registered brand. This will benefit both official disease programs as well as state-based programs. Field inspection data are also entered into the same software program by office staff as they are received from the country.

MDOL will continue to work with USDA on enforcement of traceability requirements. This will include reviewing traceability data and sharing violations with USDA. MDOL would like to track veterinary violations by veterinarian, type of violation, and numbers of violations. This would allow targeted communication with veterinarians to improve compliance.

As all the goals in this plan are already underway, MDOL's intent is to continue to refine and improve implementation and use of current tools to ensure effective traceability.

Programmatic milestones MDOL hopes to accomplish during the lifecycle of this plan include:

- Transition to requiring all CVIs issued for Montana origin animals to be issued in an electronic format. Currently, MDOL allows veterinarians to issue up to 20 paper CVIs per year.
- Increase the capture of traceability data by ensuring that all official identification on brucellosis test charts is captured electronically.
- Support the transition of Montana livestock markets to a new platform for the issuance of electronic CVIs at markets.
- Provide an electronic option for veterinarians to generate test charts and vaccination certificates.
- Connect our state animal health software to USDA AHER to contribute Montana traceability data to the national database.
- Development of in-state applications that allow data integration between state animal health, brands, and laboratory data to allow more rapid compliance investigation and disease traces.

II. CURRENT TRACEABILITY SITUATION

2.1 Who are we? Animal disease traceability in Montana is the responsibility of MDOL and USDA APHIS VS. Within MDOL, the animal health and brands divisions both contribute to advancing traceability. This includes 4 veterinarians, 7 support staff, 2 animal health investigators/ enforcement, and approximately 13 full time brands district men.

Montana has 7 reservations, 13 privately owned livestock markets, 500+ accredited veterinarians, 14 approved official tagging sites (including all our livestock markets), and numerous active producer and industry organizations that all contribute to the

success of Montana's industry. Statewide in Montana, typically encompasses all of Montana and our 7 reservations. While formal agreements with our reservations are not in place, the historical practice has been adoption of our state traceability program by default.

The traceability information collected and processed by Montana is used internally for tracing animal movement, confirming ownership, and disease management. Upon request the state of Montana is able to distribute information to NASS, legislators, USDA, and to fulfill public information requests.

Our state traceability program is primarily guided by federal ADT regulations with refinement by specific state traceability needs that are reflective of the nature of our industry. Because Montana is a net-exporting state that is primarily cow-calf, requirements for the importation of cattle into Montana exceed federal requirements.

Montana does not currently have an ADT advisory group. This group was sunset approximately 5 years ago. The membership at the time was state and federal officials with representatives from Montana's various livestock industries. Because ADT policy has been relatively static in Montana, an ongoing need for the group was not identified. Should changes to the federal ADT requirements be implemented, Montana would consider re-establishing an ADT advisory group.

2.2 Where are we now? MDOL has an animal health computer system where import data and export data for animals required to be official individually identified is entered, making traceability a cross-cutting component to all our animal health disease programs. Additionally, MDOL has a brands market program in place that electronically records change of ownership at Montana livestock markets. This software allows for animals inspected at the market to have additional information recorded including official identification and allows MDOL to create flags for certain classes of animal by registered brand.

The state of Montana's technology infrastructure is well grounded with many planned and anticipated improvements on the horizon. Currently a large volume of traceability data, including premises, ICVI, and state-disease program data, is contained within USAHerds. Official disease work including brucellosis and tuberculosis test data and official vaccination data is entered and held in USDA APHIS VS's Core One system. Traceability data can be uploaded into USAHerds when provided to MDOL from outside sources. Data can also be exported out of USAHerds for dissemination to necessary agencies and officials. The program is available 24/7 to state animal health and brands officials.

Federal funding is an important supplement to the current successes of our state traceability program. Through the funding of a partial FTE for data entry of non-electronic traceability data and through offsetting the cost of traceability

infrastructure for Montana veterinarians, these gains made through this funding are evident as Montana continues to see improvements in our ability to trace animals.

- 2.3 Strengths and Weaknesses: The primary strengths of Montana's traceability program are our animal health software system USAHerds, the brands software program, the historical knowledge of MDOL personnel, and the import permit system for all animals entering Montana. Recently MDOL has implemented a policy that all animals leaving the state must travel on an electronic health certificate. This policy allows for greater traceability by decreasing the time and margin of error from data entry.

The primary weaknesses of Montana's traceability program are the small number of personnel in department, the limited funding sources that are available for the advancement of traceability, the inability of federal systems (CoreOne and EMRS2) to communicate with state systems, and the resistance among industry against a federal or state driven traceability system.

- 2.4 Opportunities and Threats

The opportunities created by this plan include the strengthening of our state's brucellosis program, the ability to successfully trace exposed animals when investigating programmatic diseases, and the ability to strengthen our trading partner confidence in the disease-free status of Montana origin livestock.

Threats faced by Montana include a large-scale disease outbreak, further detections of bovine tuberculosis, detections of brucellosis outside of our state surveillance area, and catastrophic events. Additionally, the misperception of the intent of a state and/or federal traceability program may result in the program being undermined by state regulations and policies. Finally, confidentiality of traceability data is of substantial concern to many livestock producers and Montana does not have these protections in state law.

Without this plan there is no other state agency tasked with the protection of our state livestock industry, no it is unlikely that these tasks will be accomplished.

- 2.5 Inventory of existing infrastructure and suitability assessment:

- Human resources – The Animal Health Division of MDOL employs four full time veterinarians and 7 office support personnel who contribute to traceability in Montana. Additionally, two area investigators, 16 district Brands personnel, and 13 livestock markets personnel all contribute to traceability in Montana.
- Connectivity resources, both in office and in the field –USAHerds, Fort Supply (brands software), MIMS PDA use in the field, and federal databases.
- Access to USDA animal disease traceability and animal health information resources – MDOL's access to data lookup has significantly improved. MDOL now has a copy of our GDB files, access to CoreOne and other USDA databases to look

up information. MDOL would like to increase the number of employees with access to USDA systems as well as increase the overall training level of all individuals with access.

- Organization of all existing paper record systems used to access animal disease traceability or animal health information – CVI's, official test charts, and vaccination certificates are stored in house and are matched up online through the Montana permitting system. MDOL has a retention schedule for all of these records with most being destroyed after 5 years. Brand inspection data is also maintained in house.
- Automated data capture capability – Currently Montana has 25 PDA's in use in the field in Montana that allows automated capture of data by accredited veterinarians and Brands personnel. Additionally, there are more RFID wand readers in the field in use independent of PDA's. Tag information is downloaded and used to generate test and vaccination certificates. Electronic data capture is primarily occurring in and around Montana's Designated Surveillance Area for brucellosis, but Montana has recently seen an increase in use at livestock markets and by veterinarians far removed from Montana's DSA. Brand inspection data for animals sold through a Montana livestock market is all entered electronically and is immediately searchable. Inspections conducted in the country are entered into the brands software program as they are received with a usual 4–6-month lag in paper-based inspections being electronically searchable.
- Interstate movement agreements – Montana currently has agreements with 5 states that allow the movement of certain classes of animals using brand information, provided the cattle meet certain requirements.
- Tagging stations – Montana currently has 14 approved tagging sites, including all 13 livestock markets.

III. VISION AND MISSION CONTEXT FOR ADVANCING TRACEABILITY

3.1 Mission Statement: The Animal Health Division is responsible for the prevention, control and eradication of animal diseases. This involves safeguarding the health and food production capacity of the State's livestock and poultry and preventing the transmission of animal diseases to man. The prevention and control of domestic animal diseases are achieved through four major areas of activity: Import/Export, Disease Control, Alternative Livestock, and Field Operations. Traceability while not a primary activity in Montana is integral in the implementation of all four of these major areas.

Cooperation with USDA/APHIS on eradication programs is conducted through the USDA APHIS VS AVIC. The programs receive laboratory support from the Diagnostic Laboratory Division. The Import/Export Section supervises the livestock and animal import permit system as provided for in Montana Statutes. The Disease Control Program functions to protect the Montana livestock industry from disease loss by providing for the diagnosis, prevention, control, and eradication of animal diseases.

The Alternative Livestock Program regulates alternative livestock ranches with elk, deer, and other cervidae for disease control and inspection for ownership, in cooperation with the Department of Fish, Wildlife & Parks. Field operations include investigation of disease occurrence, import compliance and enforcement of Montana Codes and Administrative Rules. Recognition of veterinary practitioners to perform official work gives each program a necessary pool of professional service in field operations.

IV. TRACEABILITY REQUIREMENTS

4.1 Strategic goal(s):

- 4.1.1 Enhance electronic sharing of data among Federal and State animal health officials, veterinarians, and industry; including sharing basic ADT data with the Federal Animal Health Events Repository (AHER);
- 4.1.2 Increase use of electronic ID tags for animals requiring individual identification in order to make the transmission of data more efficient;
- 4.1.3 Enhance the ability to track animals from birth to slaughter through a system that allows tracking data points to be connected; and
- 4.1.4 Elevate the discussion with States and industry to work toward a system where animal health certificates are electronically transmitted from private veterinarians to State animal health officials.

4.2 Programmatic goals(objectives):

- 4.2.1 Transition Montana to 100% electronic CVIs to facilitated rapid and electronic transfer of traceability data
- 4.2.2 Increase the number of platforms available to veterinarians for the issuance of electronic CVIs through use of the CVI platform offered by USAHerds and supporting the transition of livestock markets to the SaleTime platform.
- 4.2.3 Finalize communication of USAHerds with AHER
- 4.2.4 Increase the amount of traceability data that is entered electronically, to ensure data is searchable. This includes brucellosis vaccination and test information.
- 4.2.5 Support the purchase of hardware for capturing traceability data electronically.

4.3 Animal disease traceability performance measures:

A. **In what state was an imported animal officially identified**

If the animal in question has any form of official identification in its ear, reporting to the state of official tagging will be nearly instantaneous. Bangs tags and metal brite tags with state codes allow instant identification of the state of tagging. The AINMS which stores 840 tag data is a web-based system and is available 24/7 so lookup of the tag can occur during non-business hours. MDOL expects to report to the State/Tribe of official tagging within 8 hours 70% of the time for those animals required to be officially identified following the final publication of the federal traceability framework.

B. Where in your State was the animal officially identified?

Once it has been established that an animal was tagged in or originated from Montana, traceback within the state is the next step. This also should be accomplished within 24 hours 70% of the time for those animals required to be officially identified following the final publication of the federal traceability framework. Multiple systems exist at this level to allow verification of tag distribution and identification of the point at which the animal was first tagged (i.e. livestock market):

USDA Brucellosis Vaccination Tag: Brucellosis vaccination tags are distributed to accredited veterinarians in Montana and a spreadsheet is maintained of this tag distribution. The spreadsheet includes name of veterinarian, range of tags, and date distributed.

When an accredited veterinarian in Montana submits their vaccination certificates to MDOL, the tags that are allocated to a producer are entered into USAHERDS. USAHERDS can be queried by tag number and all activities associated with that tag can be located, including veterinarian and owner information.

Animals moved across state lines that have Bangs tags in place are traceable back to Montana. Within Montana, the animals can be traced one of several ways.

- CoreOne/USAHERDS can be queried. Results would include all official disease work that was performed in Montana using the Bangs tag number as official ID. If the vaccination certificate is not reported to MDOL/USDA, the tag would not be recorded in CoreOne/USAHERDS. The tag can be traced back to the accredited veterinarian who applied the tag. If the animal is branded, we can additionally use brand records to trace the animal.

USDA Silver Metal Tag: Silver Metal tags are distributed to accredited veterinarians in Montana for use as official identification in animals who do not already have another form of official ID. A spreadsheet is maintained of tag distribution. The spreadsheet includes name of veterinarian, range of tags, and date distributed.

When a silver metal tag is placed in an animal, the accredited veterinarian who places the tag is expected to keep record of what animal received the tag. Unless the tag is used as official identification for part of official disease work, the tag is not entered into CoreOne.

Producers that require official identification of their animals for interstate movement must pay an accredited veterinarian for their time and for the application of the tags. By allowing tags to be applied by a producer, the financial burden on the producer and the time constraint for accredited veterinarians will be alleviated. MDOL in conjunction with USDA-APHIS-VS will begin distributing tags to producers who have either a PIN or a LID. Tag distribution will be recorded in a spreadsheet, in USAHerds, and if and when it is available to MDOL, in the AINMS.

Animals moved across state lines that have USDA silver metal tags in place are traceable back to Montana. Within Montana, the animals can be traced in one of several ways.

- 1) The tag can be traced back to the accredited veterinarian who applied the tag.
- 2) CoreOne/USAHERDS can be queried. Results would include all official disease work that was performed in Montana using the silver metal tag number as official ID. If the silver metal tag has not been used in official disease work, or if the information has not been reported to MDOL/USDA, the tag would not be recorded in CoreOne.

840 RFID Tags: 840 RFID tags are allocated directly to producers who have a national premises ID. The tags are associated to the national premises ID number in the AIN Management System.

Additionally, if the tag is used as official ID for official disease work, the tag number is entered in CoreOne along with the national premises ID.

Animals moved across state lines that have an 840 tag in place are traceable back to Montana. The animals can be traced in one of several ways:

- 1) The AIN Management System can be queried to locate the premises of origin or the point of first tagging.
- 2) CoreOne/USAHERDS can be queried. Results would include all official disease work, if any that was performed in Montana using the 840 RFID tag number as official ID.

Back Tags: Back tags are applied to cattle at Montana livestock markets. If the back tag is captured on a back-tagging report, an official test chart at market or is collected at the time of slaughter, the data can be used to identify the consignor of the animal to market.

C. From what State was an imported animal shipped?

For MDOL to identify the state the animal originated from prior to import into Montana, query of the animal health computer system (USAHerds) is necessary. The import system can be queried based upon date, species, and consignee. Once a list of imports are identified that meet the criteria of the query, CVIs must be searched in an attempt to identify the movement of the animal in question. Currently CVIs are stored in a paper format in the office. With adoption of the new animal health computer system, MDOL will eventually scan all CVI's and associate them with the generated import permit to allow electronic viewing of documents. MDOL expects to report to the State/Tribe from which an animal moved within 2 business days 70% of the time for those animals required to be officially identified following the final publication of the federal traceability framework.

D. From what location in your State was an exported animal shipped?

Traceback to the birth premises, the point of first tagging within Montana, or the location from which an animal was exported from Montana should be achievable within 5 days 70% of the time for those animals required to be officially identified. This is accomplished by: CoreOne/USAHERDS can be queried to see if the animal has been involved in official disease work and reported to MDOL and USDA APHIS VS. CoreOne will provide information about the activity, date, and producer or ranch for whom the work was performed. If the animal in question has an 840 tag, the AINMS can be queried. The AINMS will provide a tag history that will include point of first tagging and any events that have been subsequently reported to the system. If the animal in question has a Bangs tag or a metal brite tag, the accredited veterinarian that the tag was initially distributed to can be identified. If the animal in question has a back tag, this information can be used to track movement of the animal from a livestock market. Market back tagging records, brand inspections and market clearance forms can be used to identify consignee and consignor of the animal at sale. If a brand is present on the animal in question, the brand and location of the brand can be used to locate the person to whom the brand is registered.

All of this traceability data can be used to locate the CVI issued for the interstate movement of the animal in question and to identify the location in Montana from which the animal was exported.

4.4 Data requirement:

- Montana issues two forms of location identifiers: federal premises identification numbers (PIN) and state location identifiers (LID). Using our state based animal health computer system USAHerds, MDOL is able to assign both formats. MDOL defers to the use of LIDs unless a requesting producer specifically requests a PIN.
- Official animal identification in Montana will include the use of 840 identification devices (RFID and visual); USDA bangs tags, and USDA metal brite tags. The most recent communication with tribes in Montana suggests that all tribes will adopt similar identification standards. Bangs tags are distributed to accredited veterinarians and then reported back to MDOL and USDA APHIS VS through certificates of vaccination. 840 RFID tags will be allocated directly to registered premises either through official disease work performed by MDOL or USDA APHIS VS, through third party PVPs performing age and source verification, or directly to the registered premises from the manufacturer. All tag data will be available in the AINMS. USDA metal bright tags are and will continue to be distributed both to accredited veterinarians for application during the completion of official disease work and directly to producers for application to animals who will enter interstate commerce. Tag distribution to accredited veterinarians is tracked by USDA APHIS VS. Tag distribution to producers is tracked through allocation to a LID in USAHerds.
- At this time, metal tag distribution to producers is primarily to Designated Surveillance Area (DSA) producers who have increased identification requirements for sexually intact animals leaving the DSA. A significant number of MT's DSA producers utilize age and source verification programs so to date the demand for metal brite tags has been low. Through a single shipping season in MT, MDOL issued 1800 metal brite tags directly to producers. The development of the distribution of metal brite tags to a subset of MT producers has allowed MDOL to develop a system that will effectively handle larger volumes of tag distribution. At

this time, taggers are allocated to producers at no cost. When tag distribution expands beyond MT's DSA, tagger information will be distributed to producers, and they will be responsible for acquiring taggers at their own expense.

- MDOL will continue to educate and foster the use of electronic formats of CVIs for interstate movement of animals. MDOL will expect that all participating entities comply with the .XML data standards developed by the USAHA working group.

4.5 Information technology plan:

The primary IT needs of MDOL for the successful completion of the traceability road-map are:

- Year 1 - The linkage of USAHerds with federal computer systems to allow communication with EMRS2, CoreOne, the AINMS, and the premises allocator;
- Year 1 - Direct sharing of traceability data between eCVI systems and state animal health programs and between different states animal health programs using the .XML data standards developed by the USAHA working group; and
- Year 2 - Further development of an electronic database of brands movement to maximize the searchability.
- Year 3 - Development of a state IT system that allows communication between state software programs (animal health, brands, and the diagnostic lab) to facilitate disease program work and traceability.

4.6 Resource requirements:

The current administration of Montana has set numerous IT goals for state agencies. To see the goals and objectives outlined in this plan brought to fruition, MDOL will need ongoing support from state IT, the governor's office, and the legislature to ensure that adequate funding is available.

4.7 Organizational needs:

- 4.7.1 Executive Support – The Department has good support from the current administration on the need for an effective system to trace animals for disease purposes. Additionally, the current administration has set numerous IT goals for gaining efficiencies in state work that will serve the advancement of traceability in Montana.
- 4.7.2 Coordination and oversight procedures – The State Veterinarian's office with oversight by the Montana Board of Livestock and input from our state's livestock industry is responsible for advancing ADT in Montana.
- 4.7.3 Policy – The Department's ADT policy meets or exceeds the ADT general standards.
- 4.7.4 Staffing - MDOL has one full-time staff veterinarian committed to advancing animal disease traceability. The staff veterinarian along with other Department staff oversee the use of MIMS PDA by accredited veterinarians in the state, including providing initial training and set-up instructions, providing technical support, and facilitating reporting of test and vaccination data by the accredited veterinarian.

- 4.7.5 Budget requirements – ADT is funded through the federal cooperative agreement and state special revenue.
- 4.7.6 Outreach -
 - 4.7.6.1 Accredited Veterinarians – The Department provides important educational opportunities for accredited veterinarians about the importance of data completeness, accurate and timely reporting, and the value of electronic records. By facilitating the learning process and technical portions of the use of electronic records, the Department is able to demonstrate the many benefits of programs such as VSPS, eCVI, Excel based test charts and vaccination certificates, GlobalVetLink and GAM while alleviating any concerns.
 - 4.7.6.2 Livestock Markets – The Department offers support of livestock markets in the form of financial support to offset the cost of implementation of appropriate software for the issuance of eCVIs, regular communication to ensure that the unique traceability issues associated with livestock markets are managed uniformly across the state, and through coordination with livestock markets on how to capitalize on all of the information gathered at the yard to advance traceability.
 - 4.7.6.3 Industry as a whole: While accredited veterinarians are fundamental to animal disease traceability, if industry does not support and understand our approach, we will meet constant resistance to implementation.

4.8 Monitoring and reporting interstate movement activity: Animal disease traceability information is captured on test charts, vaccination certificates, health certificates, MDOL import permits, brand inspections, market clearance sheets, and at the time of distribution of official identification. Historically, this data was stored in a paper-based format that was labor intensive, time consuming and only available during regular business hours. Previously, the MDOL import permit system captured information from test charts and ICVI's prior to issuance of an import permit and provided only a limited capability to query traceability data. In January of 2011 MDOL adopted a new animal health computer system (USAHerds) that allows the input and capture of a significantly larger amount of traceability data in a format that allows easy query. Test data, vaccination information, official identification, and CVI data can be entered into the system and accompanying documents can be scanned and associated with import permit information. Additionally, the new animal health computer system stores premises information for MDOL. Additionally, USAHerds is a web based system that can be queried 24/7, can generate associated documents, and that allows the export of data in formats that can be easily transmitted to other States/Tribes/Territories.

All livestock movements into Montana require a CVI issued by an accredited veterinarian within 30 days prior to entry and an import permit, unless going directly to a federally inspected slaughter plant or livestock market. On April 1st 2020, MDOL transitioned to requiring import permits for animals traveling into the state on a paper health certificate only. Many of these

animals are also additionally required to have individual identification. Consignee, consignor, origin, destination, test information, vaccination status, and ID if required is captured in the animal health computer system at the time of issuance of the import permit providing a searchable electronic database. Paper records that are submitted to the office are correlated to import permits and the supporting documents are scanned and saved in the animal health computer system.

Official disease test charts are entered into CoreOne and vaccination certificates are entered into USAHERDS and are also stored in paper format.

V. ADVANCING TRACEABILITY

5.1 Ranking of priorities for advancement:

1. Increase access of accredited veterinarians to modalities of electronic reporting of program disease work and certificates of veterinary inspection.
2. Increased utilization of electronic records to capture brands movement data.
3. Increase the number of official identification tags distributed in Montana
4. Interaction with accredited veterinarians, livestock markets, and the livestock industry.
5. Cooperation with USDA-APHIS-VS to ensure compatibility of federal databases with those used by state animal health officials.
6. Quarterly newsletter distributed to accredited veterinarians with traceability updates.
7. Increase the number of locations identified by either a PIN or a LID
8. Annual review and update to the Montana Department of Livestock traceability website.