

Idaho State Department of Agriculture Response
to
USDA 2018 Review of Idaho's Brucellosis Management Program
Conducted April 16-20, 1028

The Idaho State Department of Agriculture (ISDA) appreciates the 2018 USDA APHIS Veterinary Services review of Idaho's Brucellosis Management Program conducted April 16-20, 2108. Although we are confident our program is performing well, we value the oversight and expertise provided by the review team. We will continue to work with VS to enhance our program where necessary and feasible. Our response, in red below, addresses the Key Recommendations made in each of the five (5) objectives outlined in the review document. The Idaho Department of Fish & Game (IDF&G) has provided responses regarding Objective Four: Wildlife Surveillance & Mitigation.

Executive Summary

Key Recommendations

1. Develop a method to monitor, enforce, and report the testing of animals leaving the DSA to ensure compliance with rules and regulations, including the number tested on a herd-level basis. Reporting should occur annually, at a minimum.
 1. Idaho's Rules Governing Brucellosis (IDAPA 02.04.20) outlines all requirements associated with Idaho's Designated Surveillance Area (DSA). ISDA livestock Investigators work continually with producers, livestock markets, veterinarians and brand inspectors to monitor the movement of test eligible cattle leaving Idaho's DSA and enforce testing requirements included in the rule. The number of animals tested are reported to the ISDA from laboratories conducting those tests. The ISDA is currently reporting this data to USDA APHIS VS in the Cattle Health Cooperative Agreement quarterly reports. Herd based data is maintained as well. The recent availability of ISDA's livestock traceability database will greatly enhance our ability to monitor cattle movements outside of the DSA, report that testing requirements have been met prior to movement and initiate enforcement action when necessary.
2. Create a system that reconciles brand inspection data with animal testing data to easily demonstrate proper surveillance.
 2. In early July, 2018, the ISDA went live with a livestock traceability electronic database that incorporates electronic CVIs, brucellosis vaccination and test records, DSA movement permits and other data important in conducting a reliable brucellosis surveillance program. The Idaho State Brand Inspector is developing an electronic data base as well, with completion projected for early April 2019. The two systems have been built to provide both agency's the ability to access each other's data on a

statewide basis. Once the Brand Department software is completed and fully functional, the ISDA will have an enhanced ability to monitor and enforce DSA requirements.

3. Implement a formal notification system of ISDA for animals leaving the DSA that require a test.
 3. Since 2014, Idaho brucellosis rules have required persons transporting test eligible cattle or domestic bison from inside the DSA to a location outside the DSA, to obtain a movement permit from the ISDA at least twenty-four (24) hours in advance of the movement. That requirement remains in effect today. The requirement was enacted to provide an enhanced level of enforcement to ensure that requisite testing has been conducted prior to test eligible cattle leaving the DSA.
4. Develop written guidelines based on specific criteria for defining DSA boundaries.
 4. The ISDA reviews the current DSA boundary on a continual basis. An annual brucellosis coordination meeting is held with ISDA, IDF&G and USDA APHIS VS-Idaho staff to evaluate current data on cattle and wild elk surveillance, identify current and future risks and develop mitigation strategies to address those risks. As per Idaho's brucellosis rule, a final decision to adjust the boundary of the DSA must be made by the Director of the ISDA or her designee. This decision is made with input from the brucellosis coordination team. Developing written guidelines for adjusting the boundary will require a negotiated rulemaking process followed by approval of the guidelines in rule by the Idaho Legislature. There are a multitude of factors to be taken into consideration in determining the appropriate boundary and those factors frequently change. Designating them in rule would limit the ability of the ISDA to adjust the boundary rapidly if deemed appropriate. For example, in 2012 a small beef herd located just outside our DSA was identified as being affected with brucellosis. After discussion with the brucellosis coordination committee, it was determined that expansion of the DSA was warranted and the expansion was approved by the director. This kind of flexibility is critical to managing risk quickly and appropriately.
5. Categorize DSA herds into high-, medium-, and low-risk categories. Identify where risk occurs and which herds are on herd plans based on risk level. Continue to target high-risk herds for participation in formal herd plans.
 5. Unless a herd is identified as being affected by brucellosis, herd plans are voluntary in Idaho. That being said, the ISDA's goal is to have 100% of all producers within or utilizing our DSA to have a current herd plan on file. Our livestock investigators in eastern Idaho have been working aggressively to increase the percentage of producers that utilize the DSA to complete a herd plan. According to our records, 66% of producers that utilize Idaho's DSA currently have a herd plan on file. Herd plans are reviewed with each producer on an annual basis by area livestock investigators to determine if changes are necessary and updated as needed. The ISDA will continue to work toward our goal of having all producers utilizing the DSA have a current herd plan on file. We will also continue analyzing herd plans to determine the risk category applicable to each producer.

6. Continue State or Federal reimbursement for brucellosis testing for all test-eligible animals moving out of the DSA and support diagnostic abortion testing at IAHL.
 6. The ISDA is fully committed to continuing reimbursement for diagnostic testing at the IAHL. Adequate federal funding is a critical component of our ability to continue this valuable surveillance tool.
7. Reduce minimum testing age within the DSA to 12 months from current 18 months.
 7. Reducing the minimum testing age of test eligible cattle will require the ISDA to follow the negotiated rulemaking process and seek legislative approval. Over the past year, the state veterinarian has been engaged in conversations with the Idaho Cattle Association discussing a potential change to the minimum testing age. These discussions will continue and the negotiated rulemaking process will be initiated.
 8. Assuming we are successful in reducing the minimum test eligible age, more cattle will need to be tested and increased funding will be required to continue our successful reimbursement program to accredited veterinarians.
8. Maintain or increase elk surveillance to better enact wildlife management strategies to decrease prevalence, when necessary.
 - See IDF&G response under Objective 4.
9. Increase the length of market, feedlot, and dealer Records Retention in Idaho statutes to match 9 CFR.
 - This change will require the ISDA to initiate the negotiated rulemaking process and acquire legislative approval of the change. The ISDA intends to pursue this rule change.
10. Finalize the memorandum of understanding (MOU) between APHIS and ISDA and review it annually.
 - The ISDA is currently working with APHIS to finalize the MOU.

I. Objective One: Review the Adequacy of Idaho's Brucellosis Rules to Prevent the Spread of Brucellosis Beyond the DSA

Recommendations

1. Create a system that reconciles the brand inspection data with animal testing data to easily demonstrate that proper surveillance is being conducted. We hope the new ISDA database, which is scheduled to roll out in July 2018, will accomplish this goal.
 - o The ISDA's livestock traceability electronic database went live in early July, 2018. It was built to allow communication with the electronic brands program currently under development. Completion of the brands database is projected for April, 2019. Once complete, ISDA staff will have read access to all brand inspections written for cattle producers throughout the state. This will provide

enhanced monitoring of cattle movements out of the DSA and assist with enforcement of testing requirements.

2. Incorporate electronic brands when implemented. This will increase information for ISDA to monitor and enforce testing, as well as provide credible information for outside trading partners. Important components to consider include:
 - a. Report the number of test eligible animals leaving the DSA via brand records compared to the number of animals tested on a regular basis annually, at a minimum.
 - b. Reconcile market brand inspections with sale tallies for the two markets serving the DSA.
 - c. Include the number of herds tested and the number of animals tested within each herd.
 - d. Measure how often each individual herd within the DSA receives an individual animal test and what percentage of the herd is tested on an annual basis.
 - e. Measure how long individual herds within the DSA go without having a single movement test.
 - **As mentioned in subsection 1 above, once the Idaho Brand Inspection electronic database is functional, the ISDA will have immediate access to brand inspection data. This will allow for enhanced surveillance, monitoring and enforcement of movement rules as well as streamline reconciliation of movement data. The ISDA has and will continue to reconcile market sale tallies with brand inspections for all markets potentially receiving DSA cattle. The information outlined in c, d and e above is already measured and available at the ISDA.**
3. APHIS and the ISDA should finalize and sign an MOU to include a BMP as soon as reasonably possible, preferably by December 31, 2018, to come under full compliance with 9 CFR 78. APHIS and ISDA shall revisit this MOU annually.
 - **The ISDA is currently working with APHIS to finalize the MOU. The last communication ISDA found indicated that Idaho's edits had been forwarded to VS in mid-2012.**
4. Continue financial reimbursement for testing to veterinarians and labs to maintain no out-of-pocket expense to producers. This portion of the program is essential to compliance.
 - **The ISDA is fully committed to continuing reimbursement for diagnostic testing at the IAHL as utilizing accredited veterinarians to conduct surveillance testing is an extremely important part of our program. Adequate federal funding is a critical component of our ability to provide testing at minimal cost to the producer and allowing continued utilization of this valuable surveillance tool.**
5. Reduce minimum testing age within the DSA to 12 months from current 18 months.
 - **Reducing the minimum testing age of test eligible cattle will require the ISDA to follow the negotiated rulemaking process and seek legislative approval.**

Over the past year, the state veterinarian has been engaged in conversations with the Idaho Cattle Association discussing a potential change to the minimum testing age. These discussions will continue and the negotiated rulemaking process will be initiated.

- Assuming we are successful in reducing the minimum test eligible age, more cattle will need to be tested and increased federal funding will be required to continue our vitally important reimbursement program to accredited veterinarians.
6. Keep USDA apprised of the new ISDA database project and the ability to crosscheck brand inspection DSA visits with brucellosis test charts.
 - The ISDA database went live in early July, 2018. We are conducting significant outreach with veterinarians across the state to increase use of the electronic system. The Idaho State Brand Inspection database is projected to be completed by early April, 2019. ISDA staff will have read access to brand data immediately which will provide an increased level of monitoring and enforcement.
 7. Consider implementing the use of radio frequency ID (RFID) or other electronic OCV tags and increase their use through measurables (# of tags/year). Target herds within DSA that retain breeding heifers to work towards an all-electronic herd.
 - a. In order to support RFID use, APHIS should provide equipment to ISDA, such as RFID reader wands, for use by private veterinarians servicing the DSA (approximately 12).
 - The ISDA has, for many years, advocated the use of RFID technology to producers within the DSA as well as statewide and will continue to be a hearty proponent of RFID, particularly in the DSA. The cost of RFID tags has historically been a challenge for producers and thus, it is not realistic for the ISDA to mandate their use within the DSA without requiring their use statewide. The ISDA does not have the funding for such a mandate. We are slowly seeing producers embracing RFID technology. Providing reader wands to veterinarians servicing the DSA would be welcomed and we encourage APHIS to support their recommendation.
 8. Work towards the use of electronic capture of data at livestock markets, such as creation of test charts, complete capture of all IDs, etc. Until then, ISDA/USDA should regularly audit test records and animal movements through livestock markets.
 - a. Consider economic incentives for those transmitting electronic test records
 - The ISDA will continue to work with all livestock markets urging them to move to electronic data systems. Ultimately, because they are a free enterprise, the decision will be up to them. The ISDA would welcome conversations with APHIS on how to provide an economic incentive to markets to utilize electronic technology. However, our state budget could not fund such an activity.
 - Although the ISDA routinely audits livestock market records as required by state code, the newly implemented livestock traceability database will

dramatically enhance our ability to regularly audit market records and animal movements through the market.

9. If intra-herd prevalence increases in affected herds detected or in the DSA as a whole, then it would be prudent to switch strategies to area whole or fractional (e.g., 20 percent) herd tests.
 - As APHIS noted throughout the review, Idaho's brucellosis management program has been highly successful at finding affected herds with a very low intra-herd prevalence. We will continue to monitor our strategy and, if a change is necessary, will implement changes when warranted.
10. Idaho has enjoyed relatively few brucellosis-affected herds in the last few years, but ISDA should not become complacent, as the risk of brucellosis is steadily increasing via expanding elk populations and range.
 - The ISDA is well aware of the risk posed by expanding elk populations and has no intention of becoming complacent in regards to our brucellosis management activities. We continue to take proactive steps to mitigate the risk of transmission from wildlife to livestock.
11. Consider OCV exemption in cattle located outside the DSA that participate in raw-milk sales
 - Idaho has a mandatory statewide brucellosis vaccination requirement for cattle and domestic bison. Idaho law allows a small herd exemption for raw milk producers. The state veterinarian will initiate discussions with cattle and dairy producers to gauge interest in exempting the vaccination requirement relative to raw milk cows. Up to this point, our producers have remained adamant that Idaho continue with its mandatory vaccination requirement for all classes of breeding cattle and domestic bison.

II. Objective Two: Assess the Enforcement of Brucellosis-related Rules Identification, Livestock Markets, Dealers and Slaughter Plant(s)

Recommendations

1. Require RFID tags to be used in the DSA to assist in ease of movement and to assure accurate entry of animal ID in required documents.
 - The ISDA has, for many years, advocated the use of RFID technology to producers within the DSA as well as statewide and will continue to be a hearty proponent of RFID, particularly in the DSA. The cost of RFID tags has historically been a challenge for producers and thus, it is not realistic for the ISDA to mandate their use within the DSA without requiring their use statewide. The ISDA do not have the funding for such a mandate. We are slowly seeing producers embracing RFID technology. If the ISDA were able to provide RFID tags at no cost to producers within the DSA utilizing cooperative agreement funds, RFID use would likely increase dramatically. Providing reader wands to veterinarians servicing the DSA would be welcomed and we encourage APHIS to support their recommendation.

2. Change records retention in State rules to equal those in 9 CFR.
 - This change will require the ISDA to initiate the negotiated rulemaking process and acquire legislative approval of the change. The ISDA intends to pursue this rule change.

Livestock Markets (Auctions) Recommendations

1. Provide markets with DSA maps with an updated list of producers or towns located in the DSA.
 - Maps of Idaho's DSA along with lists of known producers utilizing the DSA have previously been provided to markets that could potentially receive DSA cattle. The ISDA will follow up with markets to ensure that those producer lists are kept current and available for markets to utilize.
2. Move brucellosis market testing back to the area provided by the market so the VS inspector may monitor equipment and supplies. Currently, testing is performed in a private veterinary clinic next door to market
 - The ISDA will work with USDA APHIS VS-Idaho staff, the IAHL brucellosis lab manager, the livestock market and accredited veterinarian to address this issue
3. Repair or replace faulty or unsafe equipment used for brucellosis testing.
 - The ISDA will work with USDA APHIS VS-Idaho staff, the IAHL brucellosis lab manager, the livestock market and accredited veterinarian to address this issue.
4. Start utilizing the RFID readers in the markets and have data dumped from the readers into databases.
 - Over 10 years ago, several livestock markets were supplied with RFID reader panels. One of the markets utilized the readers until they ceased functioning. Another market worked with a third-party RFID service provider to utilize the readers but was unsuccessful on multiple attempts. Both of those systems are non-functional and no longer have tech support. Several years ago, the ISDA provided select livestock markets with hand held readers. Unfortunately, the readers do not interface with the market management software programs so data is not readily retrievable. The ISDA will continue working with the markets to develop a solution to this issue. Until RFID usage is more widespread, markets will be hesitant to invest in electronic reader technology.
5. Supply dealers with back tags and have them submit a list of tags applied to the regulatory officials.
 - Official backtags are distributed and tracked by the USDA APHIS VS-Idaho office. The ISDA will work with VS-Idaho to address this issue.
6. If available, display a poster at the tagging area of all livestock markets that demonstrates the proper placement of back tags.

7. Maintain the working relationships with livestock markets.
8. Reconcile all animals presented at the market with previous test records as the animals are presented for sale. When possible, use electronic means to facilitate rapid collection of animal information to facilitate commerce.
 - ISDA's new livestock traceability database should assist with the implementation of this recommendation.
9. Educate all regional markets on the need to test DSA-origin test-eligible animals and inform them of producers located within the DSA.
 - The ISDA will continue working with markets on a regular basis to ensure that test-eligible cattle are tested and that producer lists are current.
10. Market veterinarians conducting brucellosis testing should be proficiency tested on a regular basis, as they are in Wyoming and Montana.
 - The ISDA will work with USDA APHIS VS-Idaho staff, the IAHL federal brucellosis lab manager, the livestock market and accredited veterinarian to address this issue.

Slaughter Plants

Recommendations

1. Continue collecting samples from all eligible animals in slaughter plants.
2. Continue the working relationship between VS/ISDA and CS Beef.

III. Objective 3: Assess Cattle Surveillance, Diagnostics/Laboratory Capability, and Producer Education in Place to Support the Program

Recommendations

1. Continue the current level of cattle surveillance and producer education for the brucellosis program.
 - The ISDA is continually seeking opportunities to enhance cattle surveillance on herds inside the DSA and, when possible, herds outside of the DSA. Our investigators work aggressively to identify new producers utilizing the DSA and educate all producers on the brucellosis program requirements.
2. Idaho should contact the National Brucellosis Surveillance Laboratory in Kentucky to compare and modify their protocols for calling samples non-negative to ensure they are in line with national labs.
 - The ISDA will work with USDA APHIS VS-Idaho staff and the IAHL federal brucellosis lab manager to address this issue.

IV. Objective 4: Wildlife Surveillance and Mitigation

Recommendations

1. Respond more quickly to public reports of elk commingling with cattle.
 - IDFG responds to reports of elk depredating on stored hay or co-mingling with cattle when contacted by landowners in as timely a manner as possible. IDFG expanded its depredation funding options and hired depredation technicians in each of the 7 administrative regions of the agency to try to meet the needs and demands of landowners. Within the DSA boundaries, the regional wildlife staff,

(biologists, managers, landowner-sportsmen coordinators, and depredation technicians) are aware of the need to be responsive and cooperative.

2. Continue the annual Brucellosis Coordination Committee meetings where stakeholders give updates, report progress, address problems and develop plans for the future.
 - IDFG will continue to work cooperatively with ISDA and USDA on the annual Brucellosis Coordination Committee meetings.
3. Request more Federal cooperative agreement funding to support IDFG wildlife mitigation strategies, including more haystack materials available to producers in and around the DSA.
 - IDFG will work with ISDA to complete a proposal for enhanced funding from USDA for wildlife mitigation strategies and brucellosis surveillance in elk and submit the proposal to USDA in 2019.
4. Continue to work closely with ISDA and DSA producers to mitigate risks from elk contact with cattle in and around the DSA.
 - All IDFG regions within and adjacent to the DSA work with landowners and producers to reduce elk-hay and elk-cattle interactions and will continue to do so.
5. Culture seropositive elk using:
 - trained field tech to harvest quality tissues and keep the link to blood samples intact; or
 - sample elk during opening week in hunting districts with highest seroprevalence; or
 - store tissue until it can be linked to positive sample.
 - IDFG has repeatedly tried to collect tissue samples from elk for brucellosis. IDFG routinely collects samples from cow elk hunters, averaging 1500 kits per year which result in 100-300 good quality samples for testing. With this system, there is virtually no option to collect samples for culture as IDFG does not have access to these carcasses as there is no mandatory check required of elk hunters and the samples are mailed to ISDA for testing. Since 1998, IDFG has collected samples for brucellosis culture from numerous elk (Rainey Creek origin animals - 1999 – 6/11 (3 biovar 1, 3 biovar 4); 2000 - 2 /8 (1 biovar 4 and 1 RB51); 2001 – 1/1 (1 (biovar 4); 2002 – 2/3 (1 biovar 1, 1 biovar 4); 2004 – 1/2 (biovar 4); (Conant Creek origin animals – 2002 – 1/1 (biovar 1). In addition, several animals captured for management or research purposes that were radio-collared and tested seropositive for brucellosis have been killed and tissues submitted for culture (n=5), all have been negative to date. Tissue samples from 25 elk harvested by hunters in the DSA were collected and submitted for culture in winter 2012-13, none were culture positive. The question is not whether IDFG has or can obtain tissue samples for culture. Another question is whether NVSL has the material or the data from these past cultures?
 - IDFG will be providing a training session for biologists to collect tissue samples for in September 2018. The idea is to try to collect blood and tissue samples from animals harvested by depredation hunters or kill permit holders and have trained IDFG personnel on site to collect these samples as soon as possible after the elk is killed. The goal is to try to collect samples from 10-15 animals in winter 2018-19.

6. Maintain or request more Federal funding to support wildlife brucellosis surveillance to keep track of potential changes in seroprevalence and assess DSA boundaries. Continue to capture 60-80 elk for radio-collaring to monitor wildlife movements.
 - IDFG will be working with ISDA to develop a proposal for enhanced funding from USDA for elk surveillance and elk captures in areas that are important to meet agency elk management goals and that would help make management decisions for brucellosis in these elk herds.
 - IDFG maintains a research and management program for elk based on the needs of the agency and public that use the resource. IDFG has plans to continue a long-term monitoring project for elk looking at movements and cause specific mortality in numerous study areas across the state, but not specifically within the DSA. If additional radio collar efforts are needed to enhance elk surveillance or management in the DSA, that effort will require USDA funding which would be part of the enhanced budget that IDFG and ISDA will submit to USDA in 2019.

V. Objective 5: Evaluate DSA Boundaries, Testing, and Movement Restrictions for Overall Effectiveness

Recommendations

1. Develop written guidelines based on specific criteria for defining the boundary of the DSA. Base the boundaries on the following:
 - a. Elk range/location, changes in observed elk seroprevalence or culture positive elk, elk-livestock interface, or other risk factors.
 - b. Establish criteria that would trigger a change in the DSA based on these risk factors.
2. Categorize DSA herds into high-, medium-, and low-risk categories. Identify where risk occurs and which herds are on herd plans based on risk level, continue to target high-risk herds for participation in formal herd plans, and include medium- and low-risk herds when possible. Defining what constitutes high-, medium-, and low-risk will be necessary to create these categories.
3. Reduce minimum testing age within the DSA to 12 months from current 18 months.
 - All of these items have been addressed in preceding sections.