



# National Milk Testing Strategy: Frequently Asked Questions

On December 6, 2024, the U.S. Department of Agriculture (USDA) announced the start of the National Milk Testing Strategy (NMTS). This initiative builds on measures USDA has taken since the beginning of the outbreak of highly pathogenic avian influenza (HPAI H5N1) in dairy cattle. It was developed with significant input from State, veterinary, and public health stakeholders.

The 5-stage strategy includes:

- **Stage 1 - National Plant Silo Monitoring:** Conducting nationwide testing of milk silos at dairy processing facilities to identify where the disease is present, monitor trends, and help States identify potentially affected herds.
- **Stage 2 - Determining State Status:** Working with States to stand up bulk milk sampling programs to identify herds that are affected with H5 or demonstrate an unaffected status.
- **Stage 3 - Detecting and Responding to the Virus in Affected States:** Identifying specific cases and implementing rapid response measures, including enhanced biosecurity, movement controls, and contact tracing, in States with H5 detections.
- **Stage 4 - Demonstrating H5 Absence in Unaffected States:** Continuing and progressively reducing sampling of bulk milk as the State demonstrates continual unaffected status.
- **Stage 5 - Demonstrating H5 Freedom in U.S. Dairy Cattle:** Conducting periodic sampling and testing to illustrate long-term absence from the national herd.

The NMTS is an important additional step to help States and farmers contain and eliminate H5 in their livestock and from the U.S. dairy population overall. This document answers frequently asked questions about the strategy.

## How long does USDA plan to conduct this sampling program?

We will consider ending the NMTS when all States reach Stage 5 and can demonstrate freedom from H5 in the U.S. dairy herd.

## What does the December 6, 2024 Federal Order mean for farmers, producers, and States?

In April 2024, USDA issued a Federal Order mandating testing of lactating dairy cattle prior to interstate movement. That Federal Order is still in force. The December 6, 2024 Federal Order expands on that testing requirement by mandating that any entity that sends or holds milk for pasteurization (such as a dairy farm, bulk milk transporter, bulk milk transfer station, or dairy processing facility) provide raw (unpasteurized) milk samples for influenza A testing to USDA's Animal and Plant Health Inspection Service (APHIS), upon request. APHIS will leverage existing milk



sampling infrastructure as much as possible to minimize the burden of sample collection for producers, processors, and regulatory officials.

Additionally, this order mandates that laboratories and State veterinarians report positive results, including from raw milk, to USDA. It also requires herd owners with positive herds to provide epidemiological information about their herd to USDA.

## What does the NMTS require of producers and farmers?

Producers must provide raw milk samples for testing, upon request. Producers with positive test results will be required to cooperate with State and Federal officials as well as complete an epidemiologic study to determine how their farm may have become affected. Any herd that is connected to a positive herd through the epidemiological study must also submit to testing and follow movement restrictions implemented under the authority of State animal health officials to reduce virus spread.

## What information will be made public under the NMTS? Will USDA protect producer and farmer privacy?

USDA has been testing milk under Federal Order since April 2024. We will continue to protect producers' personally identifiable information and protected business information according to applicable statutes and regulations as we expand testing under the December 6, 2024 Federal Order. We will only share State-level or aggregated data.

## What happens when a raw milk sample tests positive for H5?

Raw milk samples that test positive for H5 will trigger additional State investigation. The goal is to quickly identify cases and implement rapid response measures and surveillance to

eliminate the virus from affected herds. A State will not be considered affected based only on test results for raw milk samples collected from processing plant silos. Additional testing at the herd level will determine herd status as well as State status under the NMTS.

**What happens when a State is declared as having active infections?**

A State in which at least one dairy herd has been confirmed positive for H5 based on herd testing will be assigned to Stage 3. States in Stage 3 will be required to conduct additional surveillance, identify cases, and implement rapid response measures, including enhanced biosecurity, to eliminate the virus from affected herds.

**What happens when a State demonstrates the virus' absence? Will testing continue to ensure that State remains virus free?**

Once a State progresses to Stage 4, ongoing testing will continue to demonstrate virus absence or elimination. USDA will use statistical sampling and a phased approach to reduce sampling frequency over time. A State may use the results from ongoing nationwide testing of milk silos at dairy processing facilities (Stage 1) to meet Stage 4 surveillance requirements if sampling is representative of dairy herds within that State.

**What do the different stages mean? Are they linear?**

Each stage represents a different type of sampling or surveillance based on the State's status. Stages within the NMTS may occur concurrently throughout the country based on each State's situation. Each State may not need to proceed through all the Stages in a linear fashion depending on the testing results. Sampling schemes in each stage are flexible based on each State's resources and industry.

**How does the NMTS expand upon current testing measures? Is it legally enforceable?**

The NMTS creates a framework for increasing testing in every State to ensure that we can confidently detect the virus when it is present. If the virus is present, we will begin testing at the farm level to determine which premises are affected so that additional response measures can be put in place. Ongoing testing will demonstrate when that dairy, and eventually the State, becomes free of the virus.

USDA has authority under Section 8308 of the amended Animal Health Protection Act (AHPA) to carry out operations and measures to detect, control, or eradicate any pest or disease of livestock. Section 8315 authorizes the Secretary of Agriculture to issue orders as necessary to carry out the AHPA. Data collected over the past 7 months indicates that virus can be transmitted on equipment, people, or other items that move from farm to farm, including between dairies and poultry facilities. Expanded disease surveillance provides more data to detect disease, understand virus prevalence, and inform focused response efforts as part of a broader strategy for containing and ultimately eliminating the virus. (See 7 U.S.C. §§ 8301, 8305, 8308, 8310, 8315.)

**Who will collect samples and do the testing for the NMTS?**

USDA will work cooperatively with State animal and public health officials, providing resources and financial support, to collect samples through existing dairy regulatory sampling infrastructure. The National Animal Health Laboratory Network and the National Veterinary Services Laboratories will conduct testing. USDA and State animal health officials will work cooperatively to respond to detections of H5 influenza in dairy herds.

**What is a "statistically significant percentage of dairies" under the NMTS?**

Sample size is based on the number of dairies in the State. In some States, this could be 75 percent or more of the State's dairies.

**What prompted USDA to change its position on testing now? Why the seemingly sudden shift?**

USDA has been communicating with stakeholders since H5 was first detected in dairy cows in late March 2024. We committed to work quickly and in concert with our Federal and State partners to better understand, mitigate the risk of spread, and contain the virus. As our understanding of this new disease in dairy cows and its impact on U.S. dairy and poultry industries has expanded, we've used lessons learned to adapt the response. After successful application of bulk milk tank testing as a screening tool in several States and an assessment of necessary resources, USDA and stakeholders are now prepared to successfully implement this expanded surveillance strategy.

**Does this shift in strategy reflect USDA concerns about food safety or its current or previous assessment that the virus can be contained and eliminated?**

No. Significant research by USDA and the Food and Drug Administration has reaffirmed the safety of our food supply, including meat and milk. Additional information on food safety studies is available on the APHIS website: News and Science Updates.

**If a farm tests positive for H5, what if anything would happen on the human side? Would USDA inform the Centers for Disease Control and Prevention (CDC) or State public health officials? Would cooperation be required in anyway?**

Yes. USDA and CDC – working with their State partners – have a coordinated process to ensure that public health officials are notified if a farm tests positive. This will ensure that individuals on farms can access personal protective equipment, recommendations on its use, and testing and treatment if they feel unwell or have been exposed. The NMTS will not change how USDA and our Federal partners address public health.