

ADVANCING ANIMAL DISEASE TRACEABILITY ROAD MAP FOR MICHIGAN

A Three-Year Plan

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I. EXECUTIVE SUMMARY

The Michigan Department of Agriculture and Rural Development, Animal Industry Division (MDARD AID) supports a functional, nationally accepted system for animal disease traceability. It is important to be able to accurately trace animals back to their premises of origin and forward through to their current premises, and to do so in a quick, efficient, and cost-effective manner. This is especially the case when dealing with contagious diseases that can spread rapidly, affect multiple species of animals, or have zoonotic potential.

On account of endemic bovine tuberculosis in free ranging white-tailed deer in one region of the state, Michigan has been on the cutting edge of animal disease traceability with mandatory use of radio frequency identification (RFID) in cattle and bison since 2007 and the utilization of USAHerds as a database for tracking movement down to the level of the individual animal. Significant investments have been made to establish, upgrade, and maintain a technology infrastructure to capture and transmit RFID traceability data from veterinarians, livestock markets, and slaughter plants across Michigan and in nearby states. MDARD AID has centralized processing of interstate certificates of veterinary inspection (CVIs) to ensure a consistent response to improperly completed CVIs and to electronically file CVIs in a searchable format for rapid retrieval.

MDARD AID is committed to USDA's four overarching goals for advancing traceability. Michigan will further advance animal disease traceability over the next three years by:

- Implementing procedures for electronic data sharing with USDA's Animal Health Event Repository (AHER).
- Increasing electronic records of RFID events from tag distributors and accredited veterinarians.
- Integrating ultra-high frequency (UHF) RFID readers into existing low frequency (LF) RFID technology infrastructure.
- Exploring options for livestock market software to correlate an animal's backtag number with its RFID number.
- Creating a USAHerds database analyst position responsible for developing and enforcing data standards and procedures, providing user training, and exploring ways to increase efficiencies using USAHerds.
- Continuing outreach efforts to educate livestock markets, veterinarians, dealers, producers, and other stakeholders on animal disease traceability.
- Meeting or exceeding USDA traceability performance standards through completion of trace exercise activities.

II. CURRENT TRACEABILITY SITUATION

2.1 Who are we?

The Michigan Department of Agriculture and Rural Development, Animal Industry Division (MDARD AID) is responsible for animal traceability as authorized under Public Act 466 of 1988, the Animal Industry Act. In Michigan, there is a close working relationship between MDARD AID and the USDA APHIS VS Michigan

Area Office. The two agencies often share resources and duties for animal health programs.

Michigan has the unique challenge of endemic bovine tuberculosis in free ranging white-tailed deer living in the northeastern portion of Michigan's lower peninsula. MDARD AID, USDA APHIS VS, and partner agencies dedicate significant resources to monitoring and managing this disease, with eradication as the end-goal. Bovine tuberculosis could spread beyond the endemic area in Michigan without a robust traceability system. With that, many ADT activities described herein were implemented by MDARD AID out of necessity to contain this disease.

External partners of MDARD AID for animal disease traceability include:

- Michigan Allied Poultry Industries (MAPI)
- Michigan Beef Industry Commission (MBIC)
- Michigan Cattlemen's Association (MCA)
- Michigan Department of Attorney General
- Michigan Department of Natural Resources (MDNR)
- Michigan Department of Transportation (MDOT)
- Michigan Farm Bureau (MFB)
- Michigan Horse Council (MHC)
- Michigan Milk Producers Association (MMPA)
- Michigan Pork Producers Association (MPPA)
- Michigan Sheep Producers Association (MSPA)
- Michigan State Police (MSP)
- Michigan State University, College of Agriculture and Natural Resources (MSU CANR)
- Michigan State University, College of Veterinary Medicine (MSU CVM)
- Michigan State University, Veterinary Diagnostic Laboratory (MSU VDL)
- Michigan State University-Extension (MSU-E)
- Michigan Veterinary Medical Association (MVMA)
- National Institute for Animal Agriculture (NIAA)
- United Deer Farmers of Michigan (UDFM)
- United States Animal Health Association (USAHA)
- United States Department of Agriculture, Animal and Plant Health Inspection Services, Veterinary Services (USDA APHIS VS)
- United States Department of Agriculture, Animal and Plant Health Inspection Services, Wildlife Services (USDA APHIS WS)

2.2 **Where are we now?**

USAHerds

To enhance the traceability of livestock, especially cattle herds in certain areas of Michigan where bovine tuberculosis is present, MDARD AID began using the USAHerds database on January 4, 2010. This browser-based application incorporates an electronic identification program that enables MDARD AID and USDA APHIS VS to capture and coordinate key demographic data, relocation events, test data, and more down to the level of the individual animal. The USAHerds database is accessible to approved users 24 hours a day, 7 days a week.

Mobile Information Management (MIM)

Michigan uses MIM for gathering animal data and identification numbers. Animal records may include RFID, metal NUES tags, management ID, tattoos, breed registration numbers, as well as age, breed and sex. The data is collected in MIM during bovine tuberculosis testing conducted by MDARD AID, USDA APHIS VS, and Category II accredited veterinarians working as fee-basis contractors. The data is submitted to the MIM Repository where it is uploaded to USAHerds. Data from hand-written test charts is being entered by USDA APHIS VS staff utilizing the MIM application which is uploaded to USAHerds. MDARD AID encourages the use of MIM to decrease the risk of human error in transposing numbers, to reduce the numbers of hours needed by State and Federal staff to hand enter the data into the system, and to submit the data to both State and Federal databases.

Identification Requirements

Since March 1, 2007, Michigan has required the application of radio frequency identification (RFID) ear tags in cattle and bison prior to leaving any premises in Michigan. In addition, all privately owned cervids, sheep, and goats must have official identification prior to leaving any premises in Michigan. Since 2011, cattle and bison in the MAZ, as well as all privately owned cervids, are also required to have a secondary ear tag with a visible and unique identification number.

Distribution of Official Identification

MDARD AID distributes RFID tags to privately owned cervid herds, plastic NUES tags to county fairs for identification of swine, and metal NUES tags to Category II accredited veterinarians for brucellosis vaccinates and occasionally for cattle outside the MAZ being tested for bovine tuberculosis. MDARD AID tracks the initial distribution of tags in USAHerds and the receiver is required to maintain records of where the tags are applied.

MDARD AID also offers tagging agreements to Michigan livestock markets allowing them to distribute RFID tags in exchange for tag distribution records in an electronic format compatible with USAHerds.

Permitted Movement

All cattle and bison in the MAZ, as well as those from herds that are not Wildlife Risk Mitigated in Cheboygan, Otsego, and Presque Isle counties, must have a movement permit issued by MDARD AID to leave the premises, with one exception. A movement permit is not required when the destination is the Northern Michigan Livestock (NML) market, where MDARD AID operates a real-time traceability system to verify herd status and test dates, and to capture each animal's seller and buyer information. The Michigan State Police, Commercial Vehicle Enforcement Division assists MDARD AID with enforcement via random traffic stops of livestock haulers around the zonal boundary to ensure they have a movement permit. MAZ cattle sold through any Michigan livestock market must be issued a new movement permit to their final destination.

Livestock Markets

All major cattle markets in Michigan have voluntarily allowed MDARD AID to install low frequency RFID panel readers, except for one which prefers to read

RFID tags via a handheld wand. MDARD AID receives traceability data (market premises ID, date/time stamp, and RFID number) from these facilities at least weekly for uploading into USAHerds. At least quarterly, MDARD AID field inspectors document the number of cattle sold at each sale to calculate the read rate of RFID panel readers at each market. Read rates averaging below 95% for the quarter are investigated to determine and fix the cause(s).

Markets routinely receiving cattle from the MAZ are staffed by MDARD AID field inspectors during each sale to ensure compliance with identification, testing, and permitting requirements.

Slaughter Plants

The only major slaughter plant for cattle in Michigan has a low frequency RFID panel reader provided by MDARD AID and traceability data (plant premises ID, date/time stamp, and RFID number) is transmitted from this facility after each operating day for uploading into USAHerds. Additionally, MDARD AID receives traceability data from low frequency RFID panel readers in major slaughter plants which routinely receive Michigan cattle: two plants in Wisconsin, one in Illinois, and two in Pennsylvania.

Most custom slaughter facilities in Michigan also voluntarily participate in one of three ways: the facility scans RFID tags with a handheld wand provided by MDARD AID, the facility retains RFID tags for MDARD AID to collect on a regular basis, or the facility mails RFID tags to MDARD AID. Regardless of the method, these RFID tag numbers are uploaded into USAHerds to indicate that each animal has been slaughtered.

Interstate Certificates of Veterinary Inspection (CVIs)

Michigan reviews all interstate CVIs, both imports and exports, for accuracy and compliance with state and federal requirements. If requirements are not met, an informational letter is sent to the issuing veterinarian (or for imports, to their state animal health official) and all ADT violations are forwarded to the Area Veterinarian in Charge. All CVIs are converted to an electronic document, filed in a searchable format in an electronic document management system, and retained according to state retention policies. In fiscal year 2019, MDARD AID staff processed approximately 27,000 interstate CVIs, of which 44% were issued and submitted electronically.

2.3 Strengths and Weaknesses

The strengths of MDARD AID's animal disease traceability program include an Administration that supports the program, mandatory RFID requirements, and use of technology to track animal movements. The current Governor and the MDARD Director support traceability and other activities to eradicate bovine tuberculosis in Michigan. Use of RFID in bison and cattle has been mandatory since March 2007. In January 2010, MDARD AID implemented the USAHerds database to track animal identification and movement of cattle in the bovine tuberculosis program. Since then, use of USAHerds has expanded to other livestock programs, including privately owned cervids, as well as domestic species, such as the large-scale dog breeding program. MDARD AID established a technology infrastructure across

Michigan and in three other states to track cattle using RFID from the farm to the livestock market and to slaughter. Education and outreach efforts over the last several years have resulted in over 40% of CVIs being issued electronically in Michigan. MDARD AID continues to encourage the use of technology, such as MIM and electronic CVIs, to decrease data entry errors and to increase the availability of traceability data using electronic systems.

Weaknesses within Michigan’s animal disease traceability program include staffing changes, DTMB’s security requirements which restrict third party connections to the state network, the inability for all livestock markets to link RFID to backtag numbers for maximum traceability, and finally, Michigan’s Licensing Livestock Dealers Act permits markets, buying stations and collection points to record backtag numbers in place of official ID. MDARD is working to address these challenges by identifying gaps in staff needs and working toward filling staff positions. MDARD is also working to move USAHerds to a vendor supported cloud-based environment which will allow third parties to automatically transmit data and improve our ability to update the USAHerds database. Several markets in Michigan have the technology to link RFID to backtags, however only one market is currently utilizing this technology. We will work with these markets to implement use of this technology for enhanced traceability. MDARD will pursue updating of the Michigan Licensing Livestock Dealers Act.

III. VISION AND MISSION CONTEXT FOR ADVANCING TRACEABILITY

3.1 Vision Statement

Public health, animal health and well-being, and animal industries are safeguarded through collaborative efforts and implementation of effective programs.

3.2 Mission Statement

“Protect, Regulate, and Promote Animal Health”

IV. TRACEABILITY REQUIREMENTS

4.1 Strategic Goal

Michigan is determined to enhance the existing statewide infrastructure for advancing animal disease traceability compatible with state and federal standards.

4.2 Programmatic Goals (Objectives)

MDARD AID supports the four overarching goals set forth by USDA for advancing animal disease traceability:

- Advance the electronic sharing of data among federal and state animal health officials, veterinarians and industry; including sharing basic animal disease traceability data with the federal animal health events repository (AHER).
- Use electronic ID tags for animals requiring individual identification in order to make the transmission of data more efficient.

- Enhance the ability to track animals from birth to slaughter through a system that allows tracking data points to be connected.
- 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.

To achieve this, MDARD AID has the following specific goals:

FY 2020

1. Meet traceability performance standards by documenting and recording Trace Performance Measures and National Priority Traces in EMRS2.
2. Fill a technical staff position to provide quality control and data management assistance for USAHerds functionality.
3. Program managers will work with technical staff and USAHerds advisory group to develop training and procedure manuals.
4. Increase electronic records of RFID tag data points in Michigan by enforcing all tag distributors to either enter RFID distribution data directly into AIMS or record data electronically and send records to MDARD on a regular basis for uploading into USAHerds.
5. Increase the availability of electronic records for cattle and bison by entering official ID numbers from brucellosis vaccination records into USAHerds.
6. Develop and test a plan to integrate UHF RFID readers into Michigan's existing LF RFID infrastructure at auction markets and slaughter facilities.
7. Enhance cattle traceability at select auction markets by correlating the RFID number with the backtag number.
8. Encourage the use of handheld RFID readers by accredited veterinarians working with Michigan cattle and bison via an equipment cost-share opportunity and user training to improve accuracy and timeliness of animal traceability data. During this FY, we plan to communicate to accredited Type II veterinarians through mailings, individual visits by MDARD staff for clinics needing assistance, and displays at the Michigan Veterinary Conference.
9. Monitor efforts for electronic data sharing with USDA's Animal Health Event Repository (AHER) and be prepared to implement when able.

FY 2021

1. Meet traceability performance standards by documenting and recording Trace Performance Measures and National Priority Traces in EMRS2.
2. Develop and implement a plan to improve the quality of data in USAHerds.
3. Pending results of UHF integration testing, begin purchasing and installing UHF RFID readers at Michigan auction markets and slaughter facilities with existing LF RFID infrastructure, provided sufficient funding is available.
4. Explore livestock market software options for correlating the RFID number with the backtag number at markets without this ability.
5. Test USAHerds for direct transmission of data from third parties. Once successful, develop a plan to use USAHerds for the storage and retrieval of interstate CVIs.

FY 2022

1. Meet traceability performance standards by documenting and recording Trace Performance Measures and National Priority Traces in EMRS2.
2. Implement the plan to use USAHerds for the storage and retrieval of interstate CVIs.
3. Complete purchases and installation of UHF RFID readers at remaining Michigan auction markets and slaughter plants with existing LF RFID infrastructure, provided sufficient funding is available.

4.3 Animal Disease Traceability Performance Measures

MDARD AID has a proven track record and will continue completing USDA's four traceability performance measures (TPMs) to indicate measurable improvement in Michigan's tracing capabilities. The TPMs used by USDA are:

1. Time to report to the State/Tribe official of the tagging/identifying of an animal in question that has moved interstate.
2. Time for the State/Tribe from first officially tagging/identifying an animal in question that has moved interstate to provide a record of the official tag distribution.
3. Time to report to the State/Tribe from which an animal in question has moved interstate.
4. Time for the State/Tribe from which an animal in question has moved interstate to provide the location and contact information from which the animal was moved interstate.

4.4 Data Requirements

MDARD AID uses USAHerds as the main traceability system. It is linked to the federal allocator for issuance of national premises identification numbers (PINs). MDARD AID exclusively uses national PINs for distribution records of official RFID tags, however state location identifiers are occasionally used for other purposes. USAHerds has 24/7 accessibility to approved users within MDARD AID and the USDA APHIS VS Michigan office.

Currently, MDARD AID has no agreements with another State or Tribe to accept animal identification for covered livestock other than official ID recognized in the Code of Federal Regulations and the general standards document. However, commuter herd agreements are in place with Indiana for interstate movement of swine within a production system.

Official metal NUES tags are requested by Category II accredited veterinarians only on rare occasions, and MDARD AID expects to have a surplus of metal NUES tags once they are no longer considered official ID. NUES tag distribution to accredited veterinarians is entered into USAHerds and the accredited veterinarian is required to retain a record of distribution to the end-user.

Official RFID tags are not distributed by MDARD AID; producers and tag distributors may purchase official RFID tags from the vendor of their choice. The largest tag distributor in Michigan uses AIMS to record distribution information. Michigan livestock markets may enter into an agreement with MDARD AID to

distribute RFID tags and, instead of using AIMS, may record and submit distribution information on a spreadsheet formatted for MDARD AID to upload to USAHerds. Spreadsheets are due to MDARD AID within 7 days of tag distribution, and spreadsheets are uploaded to USAHerds at least once per week. A handful of small retailers are known to distribute official RFID tags in northern Michigan and efforts are underway to have them use AIMS or enter into an agreement with MDARD AID if they wish to continue distributing official tags.

Interstate CVIs are shared with receiving states at least weekly, and interstate CVIs in violation of federal regulations are forwarded to the USDA APHIS VS AVIC at least quarterly. MDARD AID currently stores interstate CVIs in HPE Content Manager, an electronic document management system. Although HPE Content Manager is only accessible to approved users within MDARD AID, information is shared upon request with other state and federal animal health officials.

4.5 Information Technology Plan

Information technology (IT) support is crucial to enhancing and maintaining the State-wide infrastructure for our animal traceability program. MDARD AID has identified the need for a lead USAHerds staff person within AID. MDARD is also working to move USAHerds to a vendor supported cloud-based environment which will allow third parties to automatically transmit data and improve our ability to update the USAHerds database.

Michigan is currently accepting electronic CVIs from private and public vendors, including the free States' eCVI which is supported by MDARD AID (the Michigan form is referred to as the MI eCVI in our promotional material). MDARD AID will continue encouraging use of electronic CVIs and will increase the attractiveness by offering Bluetooth-enabled handheld RFID readers to Category II accredited veterinarians through a cost-share initiative. Moving our USAHerds to the vendor supported cloud server will enhance data transmission of electronic CVIs.

As new opportunities for advancement of Michigan's IT portion of the animal traceability program are identified, they will be fully explored and implemented when and where possible.

4.6 Resource Requirements

Key impediments to having a successful animal traceability program are limited financial and human resources. As Michigan moves forward with its animal traceability program there will be a need for resources, and we will address these needs in the cooperative agreement.

4.7 Organizational Needs

Division organizational transformations are not needed to implement the ADT road map at this time.

4.7.1 Executive Support

Michigan's current Governor and the MDARD Director fully support a robust animal disease traceability system to protect the livestock industries in our state and our nation.

4.7.2 Coordination and Oversight Procedures

MDARD AID has one veterinarian program manager to oversee import/export activities, RFID tag distribution and sighting data, regulation of concentration points and dealers, and technology initiatives to enhance traceability. Coordination occurs with the import/export coordinator, IT unit, and field staff. In addition, there is considerable overlap of traceability activities with the bovine tuberculosis program.

4.7.3 Policy

Michigan's Animal Industry Act, specifically Sec. 9 (3)(b), prohibits the disclosure of animal premises data under the Freedom of Information Act unless it is necessary to protect the public or animal health as determined by the director.

Michigan's Licensing Livestock Dealers Act, specifically MCL 287.128 (3)(a), requires the official identification of each animal to be recorded by licensed livestock auctions, buying stations, and collection points. However, it allows a backtag number to be recorded in place of the official ear tag or official breed registry tattoo, which does not align with current traceability goals. MDARD will pursue updating of the Michigan Licensing Livestock Dealers Act.

4.7.4 Staffing

Animal disease traceability information gathering overlaps with other disease programs within MDARD AID. Due to Michigan's split-state status for bovine tuberculosis, full-time staff are readily justified to ensure a strong traceability system. Personnel needed to implement the plan include one ADT program manager, one import/export coordinator, MDARD AID's tech team, and the majority of MDARD AID's field staff. Most office staff, from our disease program managers to the supply procurement specialist, support traceability in some capacity. Contract fee-basis veterinarians also play a crucial role in meeting Michigan's traceability objectives.

4.7.5 Budget Requirements

All animal health programs, including animal disease traceability, are funded by Michigan General Fund. Licensing fees cover a small portion of costs associated with regulating collection points and dealers. Traceability resource needs which exceed the current budget allowances will be addressed in the federal cooperative agreement.

4.7.6 Outreach

4.7.6.1 Accredited Veterinarians

In conjunction with USDA APHIS VS Michigan office, MDARD AID will continue to develop outreach activities, like the Michigan Accredited Veterinarian Handbook, to provide updated traceability information to accredited veterinarians. MDARD AID is providing information to veterinarians in the Animal Health Update quarterly e-newsletter, at veterinary association meetings, via our website, through teaching efforts at Michigan State University's College of Veterinary Medicine, and during accreditation training where individuals practice issuing an electronic CVI

and can sign up for the MI eCVI on site. Teaching efforts in Michigan extend to the licensed veterinary technician programs where students are introduced to the importance of traceability, learn about official ID and accurate CVI completion, and become familiar with electronic CVI options.

4.7.6.2 Livestock Markets

Livestock markets played a key role in implementing mandatory electronic identification in cattle and they will continue to be key players for further enhancements of Michigan's animal traceability program. MDARD AID collaborates with individual livestock market operators to create a workable traceability system without impacting the speed of commerce. Additionally, livestock markets allow MDARD AID to stock brochures and other handout materials explaining identification and movement requirements of covered livestock species, as well as licensing and recordkeeping requirements of dealers and haulers.

All major livestock markets have an agreement with MDARD AID allowing them to accept cattle without RFID for consignment so long as RFID is applied prior to the sale and an electronic record is submitted within 7 days containing each RFID number with the corresponding national PIN of the animal's origin. To help mitigate the spread of bovine tuberculosis, MDARD AID has field inspectors at markets in northern and mid-Michigan during every cattle sale to educate and enforce RFID and movement document requirements, and markets in southern Michigan are generally visited at least once a month. MDARD AID field staff audits cattle records at least quarterly, and all market records are audited annually.

4.7.6.3 Industry as a Whole

MDARD AID routinely communicates with the livestock and poultry industries. Our communications representative works closely with industry leaders, USDA APHIS VS, and Michigan State University to ensure consistent messaging on traceability and other topics. MDARD AID is frequently represented at industry meetings, conventions, and exhibitions to interact with producers and other stakeholders. Livestock and poultry industries also participate in MDARD AID emergency exercises where they see the benefits of traceability in real-life scenarios.

4.8 Monitoring and Reporting Interstate Movement Activity

Interstate CVIs for import and export are reviewed by MDARD AID's import/export coordinator for completion of data and satisfaction of movement requirements. Issuing veterinarians (or the origin state office, for import CVIs) receive a letter of education for all deficiencies, and all ADT violations are reported to the AVIC for further investigation.

MDARD AID uses HPE Content Manager to capture and sort information from interstate CVIs, including origin name, city, and state; destination name, city and state; issuing veterinarian; issue date; certificate number; species; number of animals; and movement purpose (swine only). Additionally, MDARD AID

monitors and reports movement of swine from commuter herds, as well as NPIP poultry flocks submitting VS 9-3 forms.

Animal disease traceability statistics stipulated by the ADT cooperative agreement will be reported quarterly, as required.

V. TRACEABILITY IMPLEMENTATION

5.1 Ranking of Priorities for Advancement

Specific programmatic goals to advance animal disease traceability in Michigan are outlined in section 4.2 for each year. Prioritization will be determined cooperatively between MDARD AID and the AVIC.